

PUBLIC DISCLOSURE

April 13, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The Park Avenue Bank
Valdosta, Georgia**

RSSD ID Number: 104038

**FEDERAL RESERVE BANK OF ATLANTA
1000 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30309-4470**

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

	<u>PAGE</u>
Institution's CRA Rating	1
Overall Rating	1
Performance Tests Ratings Table	1
Summary of Major Factors Supporting Rating	1
Institution	1
Description of Institution	2
Scope of Examination	3
Conclusions with Respect to Performance Tests	3
Lending Tests	3
Investment Tests	5
Service Tests	5
Compliance with Antidiscrimination Laws	6
State of Georgia	6
Overview	6
State Rating	6
Scope of Examination	6
Description of Operations in Georgia	6
Conclusions with Respect to Performance Tests	7
Metropolitan Area Reviewed Using Full-Scope Procedures	7
Description of Institution's Operations: Valdosta, Georgia Assessment Area	7
Conclusions with Respect to Performance Tests	9
Nonmetropolitan Area Reviewed Using Full-Scope Procedures	15
Description of Institution's Operations: Southwest, Georgia Assessment Area	15
Conclusions with Respect to Performance Tests	17
Metropolitan Area Reviewed Using Limited-Scope Procedures	23
Athens Assessment Area	23
Atlanta Assessment Area	23
Gainesville Assessment Area	24
Nonmetropolitan Area Reviewed Using Limited-Scope Procedures	24
Baxley/Hazlehurst Assessment Area	24
Cook Assessment Area	24
Statesboro Assessment Area	25
State of Florida	25
Overview	25
State Rating	25
Scope of Examination	25
Description of Operations in Florida (Ocala)	26
Conclusions with Respect to Performance Tests	27

TABLE OF CONTENTS (Continued)

	<u>PAGE</u>
Appendix A – Scope of Examination	32
Appendix B – Demographic and HMDA/Small Business Lending Tables	33
Appendix C – Aggregate Lending Tables	47
Appendix D – Definitions and General Information	57
Appendix E – Glossary	59

TABLES

	<u>PAGE</u>
Ratings	1
Composition of the Loan Portfolio	2
Analysis of Lending in the Assessment Areas	4
Community Development Investments – Institution	5
Community Development Services – Institution	6
Valdosta Assessment Area:	
Unemployment Rates	8
Assessment Area Demographics	10
Loan Distribution	11
Geographic Distribution of Branches	14
Community Development Services	15
Southwest Georgia Assessment Area:	
Unemployment Rates	16
Assessment Area Demographics	18
Loan Distribution	19
Geographic Distribution of Branches	22
Community Development Services	23
Ocala Assessment Area:	
Unemployment Rates	26
Assessment Area Demographics	27
Loan Distribution	28
Community Development Loans	30

INSTITUTION'S CRA RATING

Overall Rating: This institution is rated **Satisfactory**.

Performance Tests Ratings Table

The following table indicates the performance level of The Park Avenue Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>Park Avenue Bank</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

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

Summary of Major Factors Supporting Rating

The major factors supporting this rating are as follows:

- a high percentage of the bank's loans were made inside the assessment areas;
- the geographic distribution of loans reflects good penetration throughout the assessment areas;
- the distribution of borrowers, given the product lines offered by the bank, reflects adequate penetration among retail customers of different income levels and business customers of different sizes;
- the bank made an adequate level of community development loans;
- the bank has a good level of qualified community development investments and grants;
- the bank's branch network is accessible to essentially all portions of the bank's assessment areas, given the bank's business focus; and
- the bank provides a relatively high level of community development services.

INSTITUTION

Description of Institution

The Park Avenue Bank, a large community bank headquartered in Valdosta, Georgia, is a wholly owned subsidiary of PAB Bankshares, Inc., a bank holding company also located in Valdosta. The bank operates 18 branches and 26 ATMs (17 full-service and 9 cash-only) in Georgia and Florida. The bank closed one branch and one ATM in Georgia and one branch and one ATM in Florida during the review period. As of December 31, 2008, the bank had assets totaling \$1.3 billion.

The Park Avenue Bank offers a wide range of traditional financial services and credit products in each of its bank locations, but its expertise is in commercial and residential real estate development lending.

The table on the next page shows the composition of the loan portfolio according to the Consolidated Reports of Condition and Income.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2008		12/31/2007		12/31/2006	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	315,509	33.5%	352,317	38.5%	294,292	36.0%
Secured by One- to Four- Family Dwellings	196,306	20.8%	174,158	19.0%	142,501	17.4%
Other Real Estate:						
Farmland	43,502	4.6%	38,359	4.2%	40,800	5.0%
Multifamily	22,685	2.4%	14,894	1.6%	18,819	2.3%
Nonfarm nonresidential	253,960	26.9%	233,378	25.5%	236,643	28.9%
Commercial and Industrial	87,530	9.3%	78,730	8.6%	66,376	8.1%
Loans to Individuals	18,376	1.9%	19,257	2.1%	16,381	2.0%
Agricultural Loans	5,145	0.5%	3,502	0.4%	2,475	0.3%
Total	\$943,013	100.00%	\$914,595	100.00%	\$818,287	100.00%

* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

The data in the table indicates that total loans increased during the review period. Based on loan dollars, construction and development loans ranked first, followed by nonfarm nonresidential loans secured by real estate and loans secured by one- to four-family dwellings. The most significant growth occurred in the bank's loans secured by one- to four-family dwellings.

For purposes of the CRA, The Park Avenue Bank has delineated eight assessment areas in Georgia, which are listed below.

- Athens assessment area, which consists of Clarke and Oconee Counties and is part of the Athens-Clarke County MSA
- Atlanta assessment area, which consists of Henry, Dekalb, and Gwinnett Counties and is part of the Atlanta-Sandy Springs-Marietta MSA
- Baxley/Hazlehurst assessment area, which consists of Appling and Jeff Davis Counties and is not part of an MSA
- Cook assessment area, which consists of only Cook County and is not part of an MSA
- Gainesville assessment area, which consists of Hall County in the Gainesville MSA
- Southwest Georgia assessment area, which consists of Decatur and Grady Counties and is not part of an MSA
- Statesboro assessment area, which consists of Bulloch County and is not part of an MSA
- Valdosta assessment area, which consists of Lowndes, Brooks, Echols and Lanier Counties in the Valdosta MSA

The bank has designated one assessment area in Florida:

- Ocala assessment area, which consists of Marion County in the Ocala MSA

The Park Avenue Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a "Satisfactory" rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated March 12, 2007, under the large bank examination procedures.

Scope of Examination

The Park Avenue Bank's CRA performance evaluation was based on CRA activities in its assessment areas using large bank examination procedures. The examination review period covered HMDA-reportable and small business loans originated from January 1, 2007 through December 31, 2008. Small business loans by number and dollar volume exceeded the number and dollar volume of HMDA loans during the review period.

Therefore, small business loans were given the greater weight in determining the lending test rating. The examination review period covered qualified community development loans, investments, contributions and donations, and CRA service activities from March 12, 2007 through April 13, 2009. Additionally, information from two community contacts was obtained during the examination. Because a substantial amount of lending occurred in the Southwest Georgia and Valdosta assessment areas in Georgia, these two assessment areas were reviewed using full-scope examination procedures. The Valdosta assessment was weighted more heavily than the Southwest Georgia assessment area because small business and HMDA volume was much larger in Valdosta. The Florida state rating was based solely on the bank's performance in the Ocala assessment area. Additionally, because only one of the bank's branches is in Florida, greater weight was placed on the bank's performance in Georgia for the lending test. The Athens, Atlanta, Baxley/Hazlehurst, Cook, Gainesville, and Statesboro Georgia assessment areas were reviewed using limited-scope examination procedures. The bank had one branch in Jacksonville, Florida that was closed before this examination. Only three loans were made there before the branch closing. Consequently, this former assessment area was not reviewed as part of this examination.

Conclusions with Respect to Performance Tests

Lending Test

The Park Avenue Bank's lending test is rated low satisfactory based on the performance in the Valdosta and Southwest Georgia assessment areas and the Ocala Florida assessment area. The bank's lending in the limited-scope assessment areas was generally consistent with the overall performance of the full scope assessment areas. However, this did not affect the bank's overall CRA performance rating.

Lending Activity

Considering the bank's market share of deposits in its assessment areas, information gathered from community contacts, demographic information, and performance context factors, lending levels reflect adequate responsiveness to assessment area credit needs. The Park Avenue Bank originated 1,171 small business loans totaling \$147.3 million in its assessment areas during the review period. The bank also originated 1,009 HMDA loans totaling \$114.0 million in its assessment areas during the review period. Of the 1,009 HMDA loans, 470 (46.6 percent) were home refinance loans, 305 (30.2 percent) were home purchase loans, and 218 (21.6 percent) were home improvement loans. The bank made 16 multifamily housing loans.

Assessment Area Concentration

A majority of the bank's lending occurred inside its assessment areas. The table on the next page shows the number and dollar volume of loans located inside and outside of the bank's assessment areas by product type.

Lending Inside and Outside the Assessment Area

Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	218	89.7	\$6,298	62.5	25	10.3	\$3,781	37.5
Home Purchase - Conventional	275	72.6	\$39,951	61.4	104	27.4	\$25,154	38.6
Home Purchase - FHA	24	54.5	\$2,646	53.8	20	45.5	\$2,275	46.2
Home Purchase - VA	6	33.3	\$1,208	49.8	12	66.7	\$1,216	50.2
Multi-Family Housing	16	80.0	\$6,372	65.6	4	20.0	\$3,347	34.4
Refinancing	470	82.5	\$57,483	63.7	100	17.5	\$32,734	36.3
Total HMDA related	1,009	79.2	\$113,958	62.5	265	20.8	\$68,507	37.5
Small Business	1,171	80.5	\$147,311	70.2	283	19.5	\$62,624	29.8
Total Small Bus. related	1,171	80.5	\$147,311	70.2	283	19.5	\$62,624	29.8
TOTAL LOANS	2,180	79.9	\$261,269	66.6	548	20.1	\$131,131	33.4

Note: Affiliate loans not included

As indicated by the table above, 79.9 percent of the bank’s loans were made to customers and businesses inside the bank’s assessment areas. Also, 66.6 percent of the dollars associated with these loans were inside the bank’s assessment areas. This level of lending inside the assessment areas indicates that the bank is serving the credit needs of its assessment areas.

Geographic and Borrower Distribution

The geographic distribution of loans reflects good penetration throughout the assessment areas. This conclusion was based upon the bank’s performance in each assessment area considering performance context information and in comparison to available demographic and aggregate lending data.

The distribution of borrowers reflects adequate penetration among customers of different income levels and among businesses of different sizes. This conclusion was based upon the bank’s performance in each assessment area considering performance context information and in comparison to available demographic and aggregate lending data.

The analysis of HMDA and small business lending in each assessment area is discussed in greater detail later in the report.

Responsiveness to Credit Needs

Considering the good geographic distribution of loans, the adequate distribution of loans by borrower income and business revenue, and the adequate level of community development lending, the bank exhibits an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.

Community Development Lending

The Park Avenue Bank made an adequate level of community development loans. Bank-wide, community development dollars totaled \$2.5 million. The bank made affordable housing related community development loans totaling \$50,000 in the Valdosta assessment area, \$480,000 in the Southwest Georgia assessment area, \$486,732.80 in the Ocala assessment area and \$1.5 million in the limited scope assessment areas.

Investment Test

The bank’s investment test performance is rated high satisfactory. Although rarely in a leadership position, the bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors. Bank-wide investments totaled \$5.6 million, and donations to various organizations totaled \$12,740, including investments and grants in the limited-scope assessment areas. The level of performance in the Valdosta assessment area was adequate; however, performance in the Southwest Georgia assessment area was significant and performance in the Ocala assessment area was excellent. The distribution of the bank’s qualified investments is listed in the following table.

PARK AVENUE BANK COMMUNITY DEVELOPMENT INVESTMENTS		
DESCRIPTION	ASSESSMENT AREA	AMOUNT
Stateside Georgia Tax Credit Funds I & II, LLC	Atlanta	\$843,782
Federal National Mortgage Association LMI Pool	Atlanta & Ocala	\$789,318
Jefferson Davis County Georgia Municipal Bond	Baxley/Hazlehurst	\$705,003
Federal National Mortgage Association LMI Pools	Ocala	\$565,353
CRA Qualified Investment Fund	Ocala	\$572,830
Neighborhood Lending Partners of West Florida, Inc. Capital Contribution	Ocala	\$2,500
South GA Governmental Services Authority Revenue Bond (Grady County School District)	Southwest Georgia	\$1,580,000
Georgia low-income housing tax credit (LIHTC) investments	Southwest Georgia	\$536,725
Donations: United Way, Haven House, Friendship House, LAMP, Habitat for Humanity, Salvation Army, Red Cross Flood Relief, and Children’s Miracle Network	Bank wide	\$12,740
Total		\$5,608,251

The bank made occasional use of innovative and/or complex investments to support community development initiatives. New investments of \$1.3 million and outstanding investments of \$4.3 million from prior periods were considered complex or innovative. The bank exhibited adequate responsiveness to credit and community development needs.

Service Test

The bank’s performance under the service test is rated high satisfactory. Given the bank’s business focus, branch delivery systems, as well as alternative delivery systems including ATMs, telephone and online banking, are accessible to essentially all portions of the bank’s assessment areas. The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems in low- or moderate-income census tracts or to low- or moderate-income individuals. During the review period, the bank relocated one branch site and closed two branches; one in the Atlanta, Georgia assessment area and one in the former Jacksonville, Florida assessment area. Banking services, including business hours, do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.

The bank provides a relatively high level of community development services, mostly through its bank officers and employees serving in various capacities on boards and committees of numerous community development organizations. Bank staff contributed approximately 278 hours of community development services to community organizations and assisted 205 low- and moderate-income families. This includes services provided in the limited-scope assessment areas. The level of performance in the Valdosta and Southwest Georgia assessment areas was good, and the level of performance in the Ocala assessment area was adequate. The table on the next page shows the community development services that are available to all customers in all assessment areas. Please refer to the specific assessment areas for examples of the types of community development services participated in by the bank.

PARK AVENUE BANK COMMUNITY DEVELOPMENT SERVICES	
PRODUCT	DESCRIPTION
Payroll Card Accounts	Provides direct deposit and debit card access to low- and moderate-income individuals.
Skip-A-Payment	Allows customers to skip a loan payment with NO fee. Designed for customers who have been laid off or have had employment hours cut.
Remote Deposit Capture	Assist small businesses with managing payroll and making direct deposits. 78 businesses participate.
FHLBB Affordable Housing Lending Programs	Offers FHA, VA and USDA Guaranteed loan programs. 105 affordable housing loans made.

Compliance with Antidiscrimination Laws

No evidence of prohibited discrimination or the use of other illegal credit practices was noted during the examination. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations.

STATE - GEORGIA

Overview

The Park Avenue Bank’s performance in Georgia was evaluated using full-scope examination procedures. The assessment areas include the Valdosta assessment area, which is made up of four counties in the Valdosta MSA, and two non-MSA counties that make up the Southwest Georgia assessment area., The bank operates four banking offices and seven ATMs in the Valdosta assessment area, and 4 branches and five ATMs in the Southwest Georgia assessment area. Of the bank’s total lending, these assessment areas contained 52.9 percent of the HMDA loans and 37.2 percent of the small business loans by dollar volume, and 57.6 percent of the HMDA loans and 51.5 percent of the small business loans by number originated during the review period.

State Rating: Satisfactory

The Lending Test is rated: **Low Satisfactory**

The Investment Test is rated: **High Satisfactory**

The Service Test is rated: **High Satisfactory**

Scope of Examination

The Park Avenue Bank’s performance in Georgia was evaluated by reviewing the Valdosta assessment area and the Southwest Georgia assessment area using full-scope examination procedures. Other metropolitan and nonmetropolitan areas were reviewed using limited-scope examination procedures; however, through the use of available facts and data, including performance and demographic information, conclusions regarding the performance of those areas begin on page 23.

Description of Institution’s Operations in Georgia

The Park Avenue Bank operates 17 banking offices and 25 ATMs in Georgia, representing 94.4 percent of the bank’s branch network. The bank’s assessment areas in Georgia consist of the Atlanta, Athens, Baxley/Hazlehurst, Cook, Gainesville, Southwest Georgia, Statesboro, and Valdosta assessment areas.

Competition

The Georgia assessment areas are highly competitive banking markets due to the presence of multi-regional and national banks in the markets. According to the June 30, 2008 FDIC/OTS Summary of Deposits Report, there were several regional and national financial institutions with a significant branch presence in the assessment areas. The Park Avenue Bank ranked 10th out of 116 financial institutions in deposit market share

at 2.6 percent. The number of branches operated by a single financial institution in the assessment areas ranged from one branch to 77 branches.

Competition does impact the bank significantly; however, the bank has been effective in serving the credit needs of its assessment areas.

Community Contact

As a part of the CRA examination, information was obtained from community development groups regarding local economic conditions and community credit needs. Refer to each full-scope assessment area for community contact information specific to that area.

Conclusions with Respect to Performance Tests

Lending Test

The lending test rating for Georgia is low satisfactory. The Park Avenue Bank's performance with regard to the geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The bank exhibits an adequate record of serving the credit needs of low-income areas and individuals and very small businesses. The bank makes an adequate level of community development loans in the assessment areas. The bank makes use of innovative and flexible lending practices in serving assessment area credit needs.

Investment Test

The investment test rating for Georgia is high satisfactory. However, as a result of significant competition, investment opportunities are limited in the bank's full-scope assessment areas. The Park Avenue Bank has a good level of qualified CD investments and grants, particularly those not routinely provided by private investors, but is rarely in a leadership position. The bank makes use of innovative and complex investments to support CD initiatives. The bank has exhibited good responsiveness to credit and community development needs through its investment activities. Please refer to the Investment Test section of the overall institution on page 5 of this evaluation for greater detail.

Service Test

The service test rating for Georgia is high satisfactory. Delivery systems, including ATMs and branch office locations, are accessible to essentially all portions of the assessment areas. Services do not vary in a way that inconveniences portions of the assessment areas, particularly LMI geographies or LMI individuals. In addition, the bank provides a relatively high level of community development services that benefit residents of the assessment areas. Please refer to the Service Test section of the overall institution on page 6 and the specific assessment areas for examples of the types of community development services participated in by the bank.

METROPOLITAN AREA REVIEWED USING FULL-SCOPE PROCEDURES

Description of Institution's Operations: Valdosta Assessment Area

The Park Avenue Bank's performance in the Valdosta assessment area was evaluated using full-scope examination procedures. The assessment area includes Brooks, Echols, Lanier and Lowndes Counties, Georgia, which comprise the Valdosta MSA. The Park Avenue Bank operates four banking offices and seven ATMs in the Valdosta assessment area, representing 22.2 percent of the bank's total branch network. Of the bank's total lending, this assessment area contained 42.8 percent of the HMDA loans and 28.0 percent of the small business loans by dollar volume, and 41.0 percent of the HMDA loans, and 37.1 percent of the small business loans by number originated during the review period.

Demographic and Lending Data

The tables on pages 10 and 11 provide demographic and lending data that was used in analyzing the bank's CRA performance. Certain components of the data in the tables are discussed in this evaluation as they apply to particular parts of the analysis.

Population Information

The 2000 census data indicates that the population of the Valdosta assessment area was 119,560 persons, which represents 1.6 percent of the state of Georgia's population of 8,186,453 persons. The Valdosta assessment area's estimated population, as of July 1, 2007 increased by 8.9 percent to 130,170 persons.

Income Characteristics

According to the 2000 census, there were 29,705 families in the assessment area. Of these families, 22.7 percent were low-income, 17.8 were moderate-income, 20.1 were middle-income, and 39.4 were upper-income. Of total families, 4,454 (15.0 percent) had incomes below the poverty level. According to HUD, the estimated median family incomes for the Valdosta MSA for 2007 and 2008 were \$46,500 and \$45,600, respectively.

Housing Characteristics

The 2000 census indicates that there were 48,162 housing units in the assessment area, 27,532 of which (57.2 percent) were owner-occupied. The median housing value in the assessment area was \$73,250, which is 27.2 percent lower than the median housing value for the state of Georgia at \$100,600. The median age of housing in the assessment area is 22 years compared to the state of Georgia at 20 years.

Employment Statistics

The Valdosta assessment area is primarily dependent on the government, retail trade and manufacturing sectors. According to the city of Valdosta, the largest employers in Valdosta for 2007 were Moody Air Force Base, Valdosta State University, and South Georgia Medical Center. The following table shows the unemployment rates for Brooks, Echols, Lanier, and Lowndes counties, the Valdosta MSA and the state of Georgia for 2006 - 2008.

UNEMPLOYMENT RATES (Not Seasonally Adjusted)			
	2006 (annual)	2007 (annual)	2008 (annual)
Brooks County	4.0 %	4.1 %	5.5 %
Echols County	3.1 %	2.8 %	4.0 %
Lanier County	3.7%	3.6%	5.8%
Lowndes County	3.8%	3.8%	5.5%
Valdosta MSA	3.8%	3.8%	5.4%
State of Georgia	4.6%	4.4%	6.1%

Business Size Characteristics

The table on page 10 provides key demographic business data by revenue size and census tract in the assessment area. Based on 2007 Dunn & Bradstreet data, 90.2 percent of the businesses had gross annual revenues of \$1 million or less in the assessment area. For purposes of this report, businesses with \$1 million or less in gross annual revenues are considered to be small businesses.

Competition

The Valdosta MSA is a competitive banking market, with a significant presence of regional and multi-regional banks in this market. According to the June 30, 2008 FDIC/OTS Summary of Deposits Report, 19 financial institutions operated 44 branch offices in the assessment area. Park Avenue Bank operated four (9.0 percent)

of the 44 branches, with a deposit market share of 16.2 percent, which ranked 2nd in the assessment area. The top financial institution in the area was First State B&T Company of Valdosta with a 17.2 deposit market share.

Community Contact

Information was obtained from a community contact in the Valdosta assessment area regarding local economic conditions and the economic development opportunities available to local financial institutions. The contact stated that within the next few months, the City of Valdosta Urban Redevelopment and Enterprise Zones will offer many incentives requiring funding from local financial institutions.

Conclusions with Respect to Performance Tests

The tables on the following pages and in Appendix B and C to this report provide information that was used in analyzing the bank's CRA performance in the assessment area. Certain components of the data in the table are discussed in the evaluation as they apply to particular parts of the analysis.

The following tables show demographic and lending data in the Valdosta assessment area for the entire review period.

Assessment Area Demographics

Assessment Area: GA Valdosta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	8.6	2,684	9.0	1,114	41.5	6,730	22.7
Moderate-income	9	25.7	5,389	18.1	1,268	23.5	5,298	17.8
Middle-income	16	45.7	14,920	50.2	1,753	11.7	5,984	20.1
Upper-income	7	20.0	6,712	22.6	319	4.8	11,693	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35	100.0	29,705	100.0	4,454	15.0	29,705	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,653	1,689	6.1	36.3	2,235	48.0	729	15.7
Moderate-income	10,138	4,481	16.3	44.2	4,191	41.3	1,466	14.5
Middle-income	23,263	14,403	52.3	61.9	6,317	27.2	2,543	10.9
Upper-income	10,108	6,959	25.3	68.8	2,391	23.7	758	7.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	48,162	27,532	100.0	57.2	15,134	31.4	5,496	11.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	535	11.5	469	11.1	55	15.8	11	10.1
Moderate-income	1,086	23.3	974	23.1	76	21.8	36	33.0
Middle-income	1,807	38.7	1,644	39.0	125	35.9	38	34.9
Upper-income	1,242	26.6	1,126	26.7	92	26.4	24	22.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,670	100.0	4,213	100.0	348	100.0	109	100.0
	Percentage of Total Businesses:			90.2		7.5		2.3

Based on 2000 Census Information.

Loan Distribution Table

Assessment Area: GA Valdosta

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	10	7.5%	643	3.3%	4	3.0%	283	1.4%
Moderate	9	6.8%	1,164	5.9%	10	7.5%	514	2.6%
Middle	61	45.9%	7,118	36.2%	10	7.5%	1,172	6.0%
Upper	53	39.8%	10,730	54.6%	68	51.1%	12,341	62.8%
Unknown	0	0.0%	0	0.0%	41	30.8%	5,345	27.2%
Total	133	100.0%	19,655	100.0%	133	100.0%	19,655	100.0%
Refinance								
Low	15	8.1%	774	3.3%	9	4.9%	324	1.4%
Moderate	29	15.7%	3,442	14.8%	14	7.6%	1,210	5.2%
Middle	80	43.2%	8,757	37.6%	25	13.5%	1,899	8.2%
Upper	61	33.0%	10,311	44.3%	94	50.8%	13,219	56.8%
Unknown	0	0.0%	0	0.0%	43	23.2%	6,632	28.5%
Total	185	100.0%	23,284	100.0%	185	100.0%	23,284	100.0%
Home Improvement								
Low	8	8.7%	212	7.7%	12	13.0%	349	12.6%
Moderate	15	16.3%	541	19.5%	17	18.5%	328	11.8%
Middle	43	46.7%	1,188	42.9%	27	29.3%	753	27.2%
Upper	26	28.3%	830	30.0%	34	37.0%	1,269	45.8%
Unknown	0	0.0%	0	0.0%	2	2.2%	72	2.6%
Total	92	100.0%	2,771	100.0%	92	100.0%	2,771	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	50.0%	95	3.1%	0	0.0%	0	0.0%
Middle	2	50.0%	2,991	96.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	3,086	100.0%
Total	4	100.0%	3,086	100.0%	4	100.0%	3,086	100.0%
HMDA Totals								
Low	33	8.0%	1,629	3.3%	25	6.0%	956	2.0%
Moderate	55	13.3%	5,242	10.7%	41	9.9%	2,052	4.2%
Middle	186	44.9%	20,054	41.1%	62	15.0%	3,824	7.8%
Upper	140	33.8%	21,871	44.8%	196	47.3%	26,829	55.0%
Unknown	0	0.0%	0	0.0%	90	21.7%	15,135	31.0%
Total	414	100.0%	48,796	100.0%	414	100.0%	48,796	100.0%
SMALL BUSINESS								
	#	%	\$(000s)				%	
By Tract Income								
Low	29	6.7%	3,200				7.8%	
Moderate	107	24.7%	7,613				18.5%	
Middle	156	35.9%	12,677				30.8%	
Upper	142	32.7%	17,718				43.0%	
Unknown	0	0.0%	0				0.0%	
Total	434	100.0%	41,208				100.0%	
By Revenue								
\$1 Million or Less	158	36.4%	14,153				34.3%	
Over \$1 Million	110	25.3%	18,018				43.7%	
Not Known	166	38.2%	9,037				21.9%	
Total	434	100.0%	41,208				100.0%	
By Loan Size								
\$100,000 or less	339	78.1%	11,537				28.0%	
\$100,001 - \$250,000	50	11.5%	8,381				20.3%	
\$250,001 - \$1 Million	45	10.4%	21,290				51.7%	
Total	434	100.0%	41,208				100.0%	

Originations and Purchases

Lending Test

Overview

The Park Avenue Bank's number of small business loans exceeded the number of HMDA loans; however, the level of HMDA lending exceeded the level of small business lending by dollar amount in the Valdosta assessment area during the review period. The appropriate weight was given to HMDA lending and small business lending in this assessment area when determining the bank's overall lending test rating.

Lending Activity

The bank's lending levels during the review period reflect adequate responsiveness to assessment area credit needs. The Park Avenue Bank originated 414 HMDA loans totaling \$48.8 million in the Valdosta assessment area. Of the 414 HMDA loans, 133 (32.1 percent) were home purchase loans, 185 (44.7 percent) were home refinance loans, and 92 (22.2 percent) were home improvement loans. 2007 market share data reports indicate the bank ranked 8th out of 231 reporters with a market share of 3.7 percent, by number, in the origination and purchase of HMDA loans. The largest market share of HMDA loan originations by a single entity was Countrywide Home Loans at 5.0 percent.

Additionally, the bank originated 434 small business loans totaling \$41.2 million. According to 2007 market share data reports, the bank ranked 8th out of 44 reporters with a market share of 5.2 percent, by number, in the origination and purchase of small business loans. The largest market share of small business loans by a single reporting entity was American Express Bank, FSB at 20.2 percent.

Geographic Distribution of Loans

The geographic distribution of loans reflects good penetration throughout the assessment area. There are three low-income census tracts, nine moderate-income tracts, 16 middle-income tracts, and seven upper-income tracts in the Valdosta assessment area. For this analysis, the geographic distribution of HMDA and small business lending was compared with available demographic information. Performance context issues were also considered, as well as the performance of other banks.

The bank's HMDA lending in low-income tracts at 8.0 percent was greater than the percentage of owner-occupied units in these tracts at 6.1 percent. However, the HMDA lending in moderate-income tracts at 13.3 percent was less than the percentage of owner-occupied units in these tracts at 16.3 percent. By product, 7.5 percent of purchase loans, 8.1 percent of refinance loans and 8.7 percent of home improvement loans were originated in low-income tracts. Also, 6.8 percent of purchase loans, 15.7 percent of refinance loans, and 16.3 percent of home improvement loans were originated in moderate-income tracts.

According to the 2007 aggregate comparison loan distribution table for the Valdosta assessment area, located in Appendix C, the bank had a greater percentage of HMDA lending in low-income tracts at 8.0 percent compared to aggregate performance of 3.7 percent. In addition, the bank's HMDA lending in moderate-income tracts at 12.6 percent was greater than aggregate performance at 9.6 percent. Aggregate lending data for 2008 was not available.

The percentage of small business loans originated in low-income tracts at 6.7 percent was lower than the percentage of small businesses in low-income tracts at 11.1 percent. However, the bank's small business lending in moderate-income tracts at 24.7 percent was slightly higher than the percentage of small businesses located in these tracts at 23.1 percent.

For 2007, the aggregate performance comparison loan distribution table for the Valdosta assessment area in Appendix C indicates the bank made 7.3 percent small business loans in low-income tracts, which was comparable to aggregate performance at 7.9 percent. Small business lending in moderate-income tracts at

25.0 percent was greater than aggregate performance at 21.4 percent. Aggregate lending data for 2008 is not available.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The bank's lending performance reflects adequate penetration among borrowers of different income levels and businesses of different sizes. This conclusion was based on the bank's reasonable lending penetration compared to aggregate and the high percentage of small business loans made in amounts of \$100,000 and less. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared with available demographic information. Performance context issues were also considered, including the performance of other banks.

Based on demographic and loan data from the review period, the bank extended 6.0 percent of HMDA loans to low-income borrowers, which is less than the percentage of low-income borrowers in the assessment area at 22.7 percent. The bank's level of lending to low-income families may have been affected by the percentage of families with incomes below the poverty level at 15.0 percent. Typically, low-income families are most affected by poverty level criteria. The bank's percentage of HMDA loans to moderate-income borrowers at 9.9 percent was also less than the percentage of moderate-income families in the assessment area at 17.8 percent. By product, 3.0 percent of home purchase loans, 4.9 percent of refinance loans, and 13.0 percent of home improvement loans were originated to low-income borrowers. Also, 7.5 percent of home purchase loans, 7.6 percent of refinance loans and 18.5 percent of home improvement loans were originated to moderate income borrowers.

According to the 2007 aggregate comparison loan distribution table for the Valdosta assessment area, located in Appendix C, 6.3 percent of HMDA lending was made to low-income borrowers, which exceeds aggregate performance of 4.3 percent. However, HMDA lending to moderate-income borrowers at 10.1 percent was lower than aggregate performance of 13.6 percent. Aggregate lending data for 2008 was not available.

Of the 434 small business loans, revenue information was not reported for 166 businesses. Of the 268 businesses with reported revenue, 59.0 percent were originated to businesses with gross annual revenues of \$1 million or less, which is less than the percentage of small businesses in the Valdosta assessment area at 90.2 percent. However, the data indicates that 78.1 percent of the small business loans were made in amounts of \$100,000 or less, indicating a willingness to make loans to small businesses.

For 2007, the aggregate comparison loan distribution table for the Valdosta assessment area in Appendix C indicates the bank's lending to small businesses at 37.3 percent was comparable to aggregate performance at 39.1 percent. Aggregate lending data for 2008 was not available.

Community Development Lending

The Park Avenue Bank makes few community development loans in the Valdosta assessment area. One community development loan was extended during the review period in the Valdosta assessment area for \$50,000 to rehabilitate a 16 unit affordable housing apartment complex located in a moderate income tract. Bank management continues to seek community development lending opportunities in this assessment area.

Product Innovation

The Park Avenue Bank makes use of flexible lending practices in serving the credit needs of the Valdosta assessment area. The bank offers several flexible mortgage loan programs through the secondary market for first time and low-income homebuyers, with higher loan-to-value ratios, lower minimum credit scores, and higher debt-to-income ratios allowed. Sixteen secondary market mortgage loans totaling \$2.5 million were originated during the review period.

Investment Test

Park Avenue Bank’s level of qualified community development investments and grants is considered adequate considering that the availability of investment opportunities was significantly limited in the Valdosta assessment area as well as significant market competition for those investments. Qualified investments for the review period totaled \$6,200, which consisted solely of grants and donations to community development organizations which solely benefited low- and moderate-income individuals. The bank makes rare use of innovative and complex investments to support CD initiatives in this assessment area. The Park Avenue Bank exhibited adequate responsiveness to credit and community development needs through its investment activities in the Valdosta assessment area.

Service Test

Performance under the service test for the Valdosta assessment area is good based on the business lending focus of the bank, the proximity of branch locations to area business districts, and the level of community development services.

Retail Services:

Accessibility of Delivery Systems

The Park Avenue Bank has four branch offices, including its headquarters in the Valdosta assessment area. Three branch offices are located in the city of Valdosta and one branch is located in the city of Lake Park. Delivery systems are reasonably accessible to essentially all portions of the bank’s assessment area, particularly businesses. The branches are located on major roads with heavy traffic flow in proximity to retail shops, restaurants, hotels, and small businesses. The distribution of the bank’s branches was compared to the distribution of families and businesses by tract income level as of the 2000 census and is displayed in the following table:

DISTRIBUTION OF BRANCHES AND ATMS VALDOSTA ASSESSMENT AREA						
TRACT INCOME LEVEL	NUMBER OF BRANCHES	PERCENTAGE OF BRANCHES	NUMBER OF ATMS	PERCENTAGE OF ATMS	PERCENTAGE OF TOTAL FAMILIES	PERCENTAGE OF BUSINESSES
Low-Income	0	0.0 %	1	14.3 %	9.0 %	11.5 %
Moderate-Income	2	50.0 %	2	28.6 %	18.1 %	23.3 %
Middle-Income	1	25.0 %	2	28.6 %	50.2 %	38.7 %
Upper-Income	1	25.0 %	2	28.6 %	22.6 %	26.6 %
<i>Total</i>	<i>4</i>	<i>100 %</i>	<i>7</i>	<i>100 %</i>	<i>100 %</i>	<i>100 %</i>

Alternative Delivery Systems

The Park Avenue Bank offers alternative systems for delivering retail banking services to its customers, which include the following: ATMs, direct deposit, remote deposit capture, payroll card accounts, 24-hour telephone banking, and PC banking.

Changes in Branch Locations

The bank has not opened or closed any branches in the Valdosta assessment area since the previous examination. Thus, the bank’s record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.

Reasonableness of Business Hours and Services in Meeting the Assessment Area Needs

Availability of banking services and hours of operations do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. The level of branch services and hours offered by Park Avenue Bank is consistent throughout the assessment area.

Community Development Services

The Park Avenue Bank provides a relatively high level of community development services throughout the Valdosta assessment area. Bank staff contributed approximately 104 hours of community development services to community organizations. This included providing financial expertise and technical assistance to organizations that support affordable housing initiatives and small business development. The bank's community development services for the Valdosta assessment area are included in the following table.

PARK AVENUE BANK VALDOSTA COMMUNITY DEVELOPMENT SERVICES	
ORGANIZATION	ACTIVITY/SERVICE
Homeownership Initiative	A bank representative provides guidance in the home-ownership process for low- and moderate-income members of the community.
The Haven House	Bank representatives provide financial expertise with various fund raising events to assist low-income women and children in crisis.
Valdosta BlockClub	Bank representatives provide financial assistance to this group to sponsor Federal Home Loan Bank affordable housing program grant applications.
Genesis Christian School	A bank representative provides financial education classes.
Coastal Plains Headstart	A bank representative provides money management training to assist low-income families.
Ace Electric Company	A bank representative provides an income budgeting seminar for laborers employed by a local utility company.
Community Home Investment Program (C.H.I.P.)	A bank serves on the board of this organization that provides affordable housing assistance to low- and moderate-income families in Lowndes County Georgia.

NONMETROPOLITAN AREA REVIEWED USING FULL-SCOPE PROCEDURES

Description of Institution's Operations in Southwest Georgia

The Park Avenue Bank's performance in the Southwest Georgia assessment area was evaluated using full-scope examination procedures. The assessment area includes Decatur and Grady Counties, and is not part of an MSA. The Park Avenue Bank operates four banking offices and five ATMs in the Southwest Georgia assessment area, representing 22.2 percent of the bank's total branch network. Of the bank's total lending, this assessment area contained 10.1 percent of the HMDA loans and 9.2 percent of the small business loans by dollar volume, and 16.6 percent of the HMDA loans and 14.4 percent of the small business loans by number originated during the review period.

Demographic and Lending Data

The tables on pages 18 and 19 provide demographic and lending data that were used in analyzing the bank's CRA performance. Certain components of the data in the tables are discussed in this evaluation as they apply to particular parts of the analysis.

Population Information

The 2000 census data indicates that the population of the Southwest Georgia assessment area was 51,899 persons, which represents 0.6 percent of the state of Georgia's population of 8,186,453 persons. The Southwest Georgia assessment area's estimated population as of July 1, 2007 increased by 3.3 percent to 53,586 persons.

Income Characteristics

According to the 2000 census, there were 14,180 families in the assessment area. Of these families, 26.4 percent were low-income, 17.6 were moderate-income, 19.9 were middle-income, and 36.0 were upper-income. Of total families, 2,558 (18.0 percent) had incomes below the poverty level. According to HUD, the estimated median family income for Georgia non-MSA areas for 2007 and 2008 was \$43,000 and \$44,600 respectively.

Housing Characteristics

The 2000 census indicates that there were 21,959 housing units in the assessment area, 13,974 of which (63.6 percent) were owner-occupied. The median housing value in the assessment area was \$62,640, which is 37.7 percent lower than the median housing value for the state of Georgia at \$100,600. The median age of housing in the assessment area is 24 years compared to the state of Georgia at 20 years.

Employment Statistics

The Southwest Georgia assessment area is primarily dependent on government, retail trade and manufacturing. The largest employers in the assessment area for 2007 were Bainbridge-Decatur County Hospital Authority, Elberta Crate and Box Company, and Englehard Corporation. The following table shows the unemployment rates for Decatur and Grady Counties and the state of Georgia for 2006 - 2008.

UNEMPLOYMENT RATES (Not Seasonally Adjusted)			
	2006 (annual)	2007 (annual)	2008 (annual)
Decatur County	5.6 %	5.9 %	7.9 %
Grady County	3.9%	3.9%	5.9%
State of Georgia	4.6%	4.4%	6.1%

Business Size Characteristics

The table on page 18 provides key demographic business data by revenue size and census tract in the assessment area. Based on 2007 Dunn & Bradstreet data, 90.7 percent of the businesses had gross annual revenues of \$1 million or less in the assessment area. For purposes of this report, businesses with \$1 million or less in gross annual revenues are considered to be small businesses.

Competition

The Southwest Georgia assessment area is a competitive banking market, with a presence of regional and multi-regional banks in this market. According to the June 30, 2008 FDIC/OTS Summary of Deposits Report, 10 financial institutions operated 18 branch offices in the assessment area. Park Avenue Bank operated 4 (22.2 percent) of the 18 branches, with a deposit market share of 20.7 percent, and ranked 1st in the assessment area.

Community Contact

Information was obtained from a community contact in the Southwest Georgia assessment area regarding local economic conditions and the opportunities available to local financial institutions through economic development. The contact mentioned that while the economy was suffering due to high unemployment, with cut backs in the manufacturing area, two new companies have recently moved into the area. The contact also

indicated that opportunities are available for financial institutions to participate in affordable housing initiatives. In addition, Grady County has experienced some growth in small businesses that will probably need some financial assistance.

Conclusions With Respect To Performance Tests

The tables on the following pages and in Appendix B and C to this report provide information that was used in analyzing the bank's CRA performance in the assessment area. Certain components of the data in the table are discussed in the evaluation as they apply to particular parts of the analysis.

The following tables show demographic and lending data in the Southwest Georgia assessment area for the entire review period.

Assessment Area Demographics

Assessment Area: GA Southwest

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,749	26.4
Moderate-income	4	30.8	4,912	34.6	1,228	25.0	2,502	17.6
Middle-income	9	69.2	9,268	65.4	1,330	14.4	2,825	19.9
Upper-income	0	0.0	0	0.0	0	0.0	5,104	36.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	13	100.0	14,180	100.0	2,558	18.0	14,180	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	7,689	4,511	32.3	58.7	2,154	28.0	1,024	13.3
Middle-income	14,270	9,463	67.7	66.3	3,049	21.4	1,758	12.3
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	21,959	13,974	100.0	63.6	5,203	23.7	2,782	12.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	688	39.2	607	38.1	57	50.0	24	49.0
Middle-income	1,067	60.8	985	61.9	57	50.0	25	51.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,755	100.0	1,592	100.0	114	100.0	49	100.0
Percentage of Total Businesses:				90.7		6.5		2.8

Based on 2000 Census Information.

Loan Distribution Table
Assessment Area: GA Southwest

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	4.8%	8	0.4%
Moderate	8	38.1%	629	32.3%	6	28.6%	290	14.9%
Middle	13	61.9%	1,320	67.7%	3	14.3%	443	22.7%
Upper	0	0.0%	0	0.0%	9	42.9%	968	49.7%
Unknown	0	0.0%	0	0.0%	2	9.5%	240	12.3%
Total	21	100.0%	1,949	100.0%	21	100.0%	1,949	100.0%
Refinance								
Low	0	0.0%	0	0.0%	4	4.5%	85	1.1%
Moderate	28	31.8%	1,266	16.9%	9	10.2%	327	4.4%
Middle	60	68.2%	6,231	83.1%	15	17.0%	642	8.6%
Upper	0	0.0%	0	0.0%	48	54.5%	5,018	66.9%
Unknown	0	0.0%	0	0.0%	12	13.6%	1,425	19.0%
Total	88	100.0%	7,497	100.0%	88	100.0%	7,497	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	10	17.5%	134	10.5%
Moderate	19	33.3%	344	26.9%	12	21.1%	104	8.1%
Middle	38	66.7%	934	73.1%	16	28.1%	291	22.8%
Upper	0	0.0%	0	0.0%	19	33.3%	749	58.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	57	100.0%	1,278	100.0%	57	100.0%	1,278	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	818	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	818	100.0%
Total	2	100.0%	818	100.0%	2	100.0%	818	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	15	8.9%	227	2.0%
Moderate	55	32.7%	2,239	19.4%	27	16.1%	721	6.2%
Middle	113	67.3%	9,303	80.6%	34	20.2%	1,376	11.9%
Upper	0	0.0%	0	0.0%	76	45.2%	6,735	58.4%
Unknown	0	0.0%	0	0.0%	16	9.5%	2,483	21.5%
Total	168	100.0%	11,542	100.0%	168	100.0%	11,542	100.0%
SMALL BUSINESS								
	#	%		%	\$(000s)		%	
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0.0%	
Moderate	78	46.2%	5,852	43.0%	5,852	43.0%	43.0%	
Middle	91	53.8%	7,760	57.0%	7,760	57.0%	57.0%	
Upper	0	0.0%	0	0.0%	0	0.0%	0.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0.0%	
Total	169	100.0%	13,612	100.0%	13,612	100.0%	100.0%	
By Revenue								
\$1 Million or Less	92	54.4%	6,703	49.2%	6,703	49.2%	49.2%	
Over \$1 Million	24	14.2%	2,737	20.1%	2,737	20.1%	20.1%	
Not Known	53	31.4%	4,172	30.6%	4,172	30.6%	30.6%	
Total	169	100.0%	13,612	100.0%	13,612	100.0%	100.0%	
By Loan Size								
\$100,000 or less	131	77.5%	4,182	30.7%	4,182	30.7%	30.7%	
\$100,001 - \$250,000	26	15.4%	4,333	31.8%	4,333	31.8%	31.8%	
\$250,001 - \$1 Million	12	7.1%	5,097	37.4%	5,097	37.4%	37.4%	
Total	169	100.0%	13,612	100.0%	13,612	100.0%	100.0%	

Originations and Purchases

Lending Test

The Park Avenue Bank's dollar volume of small business lending exceeded the dollar volume of HMDA lending in the Southwest Georgia assessment area during the review period. Therefore, greater weight was given to small business lending than HMDA lending in this assessment area when determining the bank's overall lending test rating.

Lending Activity

The bank's lending levels during the review period reflect good responsiveness to assessment area credit needs. The Park Avenue Bank originated 168 HMDA loans totaling \$11.5 million in the Southwest Georgia assessment area. Of the 168 HMDA loans, 21 (12.5 percent) were home purchase loans, 88 (52.4 percent) were home refinance loans, and 57 (33.9 percent) were home improvement loans. 2007 market share data reports indicate the bank ranked 2nd out of 144 reporters with a market share of 6.3 percent, by number, in the origination and purchase of HMDA loans. The largest market share of HMDA loan originations by a single entity was Capital City Bank at 9.0 percent.

Additionally, the bank originated 169 small business loans totaling \$13.6 million. According to 2007 market share data reports, the bank ranked 6th out of 28 reporters with a market share of 8.3 percent, by number, in the origination and purchase of small business loans. The largest market share of small business loans by a single reporting entity was American Express Bank, FSB at 16.2 percent.

Geographic Distribution of Loans

The geographic distribution of loans reflects adequate penetration throughout the assessment area. The Southwest Georgia assessment area contains no low- or upper-income census tracts. There are four moderate-income tracts and nine middle-income tracts. In 2007, four of nine middle-income tracts were designated as distressed tracts; and in 2008 all of the middle income tracts in the assessment area were designated as distressed tracts because of poverty levels. For this analysis, the geographic distribution of HMDA and small business lending was compared with the demographic information available.

The bank's HMDA lending in moderate-income tracts at 32.7 percent was comparable to the percentage of owner-occupied units in these tracts at 32.3 percent. In addition, HMDA lending in distressed middle-income tracts at 67.3 percent was comparable to the percentage of owner-occupied units in these tracts at 67.7 percent. By product, 38.1 percent of purchase loans, 31.8 percent of refinance loans, and 33.3 percent of home improvement loans were originated in moderate-income tracts.

For 2007, the aggregate comparison loan distribution table for the Southwest Georgia assessment area in Appendix C indicates the bank had a greater percentage of HMDA lending in moderate-income tracts at 30.0 percent compared to aggregate performance of 27.1 percent. However, the bank's HMDA lending in middle-income tracts at 70.0 percent was slightly less than aggregate performance at 72.7 percent. Aggregate lending data for 2008 was not available.

The percentage of small business loans originated in moderate-income tracts at 46.2 percent was greater than the percentage of small businesses in moderate-income tracts at 38.1 percent. However, the bank's small business lending in distressed middle-income tracts at 53.8 percent was less than the percentage of small businesses located in these tracts at 61.9 percent.

For 2007, the aggregate performance comparison loan distribution table for the Southwest Georgia assessment area in Appendix C indicates the bank made 44.0 percent small business loans in moderate-income tracts, which was greater than aggregate performance at 32.4 percent. However, the bank's small business lending in distressed middle-income tracts at 56.0 percent was less than aggregate performance at 64.1 percent. Aggregate lending data for 2008 was not available.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The bank's lending performance reflects good penetration among borrowers of different income levels and businesses of different sizes. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared with available demographic information. Performance context issues were also considered, including the performance of other banks.

Based on demographic and loan data from the review period, the bank extended 8.9 percent of HMDA loans to low-income borrowers, which is less than the percentage of low-income families in the assessment area at 26.4 percent. The bank's level of lending to low-income families may have been affected by the percentage of families with incomes below the poverty level at 18.0 percent. Typically, low-income families are most affected by poverty level criteria. The bank's percentage of HMDA loans to moderate-income borrowers at 16.1 percent was slightly less than the percentage of moderate-income families in the assessment area at 17.6 percent. By product, 4.8 percent of home purchase loans and 4.5 percent of refinance loans were originated to low-income borrowers. The percentage of home improvement loans made to low-income borrowers was 17.5 percent. 10.2 percent of refinance loans and 21.1 percent of home improvement loans were originated to moderate income borrowers. The percentage of home purchase loans made to moderate-income borrowers at 28.6 percent was significantly higher than the percentage of moderate-income families in the assessment area.

According to the 2007 aggregate comparison loan distribution table for the Southwest Georgia assessment area, located in Appendix C, the bank made 10.0 percent of its HMDA lending to low-income borrowers, which significantly exceeds aggregate performance at 5.4 percent. However, HMDA lending to moderate-income borrowers at 8.9 percent was lower than aggregate performance at 16.4 percent. Aggregate lending data for 2008 was not available.

Of the 169 small business loans, revenue information was not reported for 53 businesses. Of the 116 businesses with reported revenue, 79.3 percent were originated to businesses with gross annual revenues of \$1 million or less, which is less than the percentage of small businesses in the Southwest Georgia assessment area at 90.7 percent. However, the data indicates that 77.5 percent of the small business loans were made in amounts of \$100,000 or less, indicating a willingness to make loans to small businesses.

For 2007, the aggregate comparison loan distribution table for the Southwest Georgia assessment area in Appendix C indicates the bank's lending to small businesses at 57.0 percent was significantly greater than aggregate performance at 40.2 percent. Aggregate lending data for 2008 is not available.

Community Development Lending

The Park Avenue Bank's community development lending is considered adequate. The bank made one community development loan in the Southwest Georgia assessment area. This \$480,000 loan was extended to redevelop an industrial site as part of an effort to revitalize a moderate-income area. Bank management continues to seek community development lending opportunities in this assessment area.

Investment Test

The Park Avenue Bank made a significant level of qualified community development investments and grants. Qualified investments for the review period totaled \$2.1 million. Of the \$2.1 million in investments, all but one charitable donation were prior period investments. The investments consisted of low-income housing tax credits, one municipal county school district bond and a donation to an organization which provides financial education to low-income children. Please refer to the Investment Test section of the overall institution on page 5 of this evaluation for greater detail. The bank makes significant use of innovative and complex investments to support CD initiatives in this assessment area. The Park Avenue Bank exhibited good responsiveness to credit and community development needs through its investment activities in the Southwest Georgia assessment area.

Service Test

Performance under the service test for the Southwest Georgia assessment area is good based on the business lending focus of the bank, the proximity of branch locations to area business districts, and the level of community development services.

Retail Services:

Accessibility of Delivery Systems

The Park Avenue Bank has four branch offices in the Southwest Georgia assessment area. Three branch offices are located in the city of Bainbridge and one branch is located in the city of Cairo. Delivery systems are reasonably accessible to essentially all portions of the bank’s assessment area, particularly businesses. The branches are located on major roads. The distribution of the bank’s branches was compared to the distribution of families and businesses by tract income level as of the 2000 census and is displayed in the following table:

DISTRIBUTION OF BRANCHES AND ATMS SOUTHWEST GEORGIA ASSESSMENT AREA						
TRACT INCOME LEVEL	NUMBER OF BRANCHES	PERCENTAGE OF BRANCHES	NUMBER OF ATMS	PERCENTAGE OF ATMS	PERCENTAGE OF TOTAL FAMILIES	PERCENTAGE OF BUSINESSES
Low-Income	0	0.0 %	0	0.0 %	0.0 %	0.0 %
Moderate-Income	3	75.0 %	2	40.0 %	34.6 %	39.2 %
Middle-Income	1	25.0 %	3	60.0 %	65.4 %	60.8 %
Upper-Income	0	0.0 %	0	0.0 %	0.0 %	0.0 %
<i>Total</i>	<i>4</i>	<i>100 %</i>	<i>5</i>	<i>100 %</i>	<i>100 %</i>	<i>100 %</i>

One branch is located in a distressed middle-income census tract.

Alternative Delivery Systems

The Park Avenue Bank offers alternative systems for delivering retail banking services to its customers, which include the following: ATMs, direct deposit, remote deposit capture, payroll card accounts, 24-hour telephone banking, and PC banking.

Changes in Branch Locations

The bank has not opened or closed any branches in the Southwest Georgia assessment area since the previous examination. The bank’s record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.

Reasonableness of Business Hours and Services in Meeting the Assessment Area Needs

Availability of banking services and hours of operations do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. The level of branch services and hours offered by The Park Avenue Bank is consistent throughout the assessment area.

Community Development Services

The Park Avenue Bank provides an adequate level of community development services throughout the Southwest Georgia assessment area. Bank staff contributed approximately 68 hours of community development services to community organizations. This included providing financial expertise and technical

assistance to organizations that support affordable housing initiatives and small business development. The bank’s community development services for the Southwest Georgia assessment area are included in the following table. Please refer to the community development services participated in by the bank on page 6.

PARK AVENUE BANK	
SOUTHWEST GEORGIA COMMUNITY DEVELOPMENT SERVICES	
ORGANIZATION	ACTIVITY/SERVICE
United Way of Decatur County	A bank representative is a board member and treasurer for this charity, which provides assistance to low- and moderate-income families in the county.
Learning Is For Everyone (LIFE)	A bank representative is a board member for this group which provides adult education to low-income families.
Family Collection Collaborative	Bank representatives provided free tax preparation for low-income families.
Financial Freedom Strategic Planning	A bank representative provides education to low-income families on financial management.
Friendship House	Bank representatives provide financial education to low-income middle and high school students on managing checking accounts.

METROPOLITAN AREAS REVIEWED USING LIMITED-SCOPE PROCEDURES

The following Georgia assessment areas were reviewed using limited-scope examination procedures; however, through the use of available facts and data, including performance and demographic information, conclusions regarding performance, which did not impact the overall rating for the state are provided. Please refer to the tables in Appendices B and C for information regarding these areas.

Athens Assessment Area

Description of Institution’s Operations

The bank has a very small presence in this assessment area. There is one full service branch with an ATM. The bank ranks 17th out of 19 banks in deposit market share with 0.4 percent market share. The bank has heavy competition from regional banks and larger local community banks.

Conclusions with Respect to Performance Tests

The bank’s lending, investments and service performance were lower than the overall performance. However this was because of a high level of competition among banks for such opportunities, the bank’s small presence in this assessment area, and the availability of such opportunities.

Assessment Area	Lending Test	Investment Test	Service Test
Athens	Inconsistent	Inconsistent	Inconsistent

Atlanta Assessment Area

Description of Institution’s Operations

The bank has a small presence in this assessment area. There are two full service branch offices with four ATMs; one office being located in a moderate-income tract. The bank ranks 106th out of 167 banks in deposit market share with 0.1 percent market share. The bank has heavy competition from regional banks and larger local community banks.

Conclusions with Respect to Performance Tests

The bank's lending distribution was consistent with the bank's overall performance. The bank's investment performance was higher than the overall performance consisting of \$843,782 in low-income housing tax credits. The bank's service performance was consistent with the bank's overall performance.

Assessment Area	Lending Test	Investment Test	Service Test
Atlanta	Consistent	Inconsistent	Consistent

Gainesville Assessment Area

Description of Institution's Operations

The bank has a very small presence in this assessment area. There is one full service branch with an ATM. The bank ranks 14th out of 18 banks in deposit market share with 1.0 percent market share. The bank has heavy competition from regional banks and larger local community banks.

Conclusions with Respect to Performance Tests

The bank's lending distribution was higher than overall performance. The bank's investment and service performance were consistent with the overall performance.

Assessment Area	Lending Test	Investment Test	Service Test
Gainesville	Inconsistent	Consistent	Consistent

NONMETROPOLITAN AREAS REVIEWED USING LIMITED-SCOPE PROCEDURES

Baxley/Hazlehurst Assessment Area

Description of Institution's Operations

The bank has a significant presence in this assessment area. There are two full service branch offices with ATMs, both located in distressed middle-income tracts. The bank ranks 1st out of 8 banks in deposit market share with 20.9 percent market share. The bank has competition from some regional banks and larger local community banks.

Conclusions with Respect to Performance Tests

The bank's lending distribution was higher than bank's overall performance. The bank's investment performance was also higher than the overall performance consisting of a \$705,003 municipal bond purchase. The bank's service performance was consistent with the bank's overall performance.

Assessment Area	Lending Test	Investment Test	Service Test
Baxley/Hazlehurst	Inconsistent	Inconsistent	Consistent

Cook Assessment Area

Description of Institution's Operations

The bank has a significant presence in this assessment area. There is one full service branch with an ATM, located in a distressed middle-income tract. The bank ranks 2nd out of 5 banks in deposit market share with 26.2 percent market share. The bank has competition from one regional bank and one larger local community bank.

Conclusions with Respect to Performance Tests

The bank's lending distribution was consistent with the bank's overall performance. The bank's investment and service performance were lower than the overall performance. However this was because of limited availability of such opportunities.

Assessment Area	Lending Test	Investment Test	Service Test
Cook County	Consistent	Inconsistent	Inconsistent

Statesboro Assessment Area

Description of Institution's Operations

The bank has a small presence in this assessment area. There are two full service branch offices with three ATMs; one office being located in a distressed middle-income tract. The bank ranks 6th out of 9 banks in deposit market share with 4.6 percent market share. The bank has competition from regional banks and larger local community banks.

Conclusions with Respect to Performance Tests

The bank's lending distribution was higher than the bank's overall performance. This was due to the bank making 65 affordable housing loans in the assessment area, totaling \$7.9 million. The bank's investment performance was lower than the overall performance. However, the bank's service performance was consistent with the bank's overall performance.

Assessment Area	Lending Test	Investment Test	Service Test
Statesboro	Inconsistent	Inconsistent	Consistent

STATE - FLORIDA

Overview

The Park Avenue Bank's performance in Florida was evaluated using full-scope examination procedures. The assessment area includes Marion County, which comprises the Ocala MSA. The Park Avenue Bank operates one banking office and two ATMs in the Ocala assessment area, representing 5.6 percent of the bank's total branch network. Of the bank's total lending, this assessment area contained 1.4 percent of the HMDA loans and 2.4 percent of the small business loans by dollar volume, and 0.8 percent of the HMDA loans and 1.3 percent of the small business loans by number originated during the review period.

State Rating: Satisfactory

The Lending Test is rated: **Low Satisfactory**

The Investment Test is rated: **Outstanding**

The Service Test is rated: **Low Satisfactory**

Scope of Examination

The Park Avenue Bank's performance in Florida was evaluated by reviewing the Ocala assessment area using full-scope examination procedures. The bank's only branch office in Florida is located in Ocala, Florida. As a result, because they would have been duplicative, separate evaluations for the State of Florida and the Ocala assessment area were not performed.

Description of Institution’s Operations in Florida (Ocala)

Demographic and Lending Data

The tables on pages 27 and 28 provide demographic and lending data that were used in analyzing the bank’s CRA performance. Certain components of the data in the tables are discussed in this evaluation as they apply to particular parts of the analysis.

Population Information

The 2000 census data indicates that the population of the Ocala assessment area was 258,916 persons, which represents 0.8 percent of the state of Florida’s population of 15,982,378 persons. The Ocala assessment area’s estimated population, as of July 1, 2007, increased by 25.3 percent to 324,857 persons.

Income Characteristics

According to the 2000 census, there were 74,927 families in the assessment area. Of these families, 17.1 percent were low-income, 19.9 percent were moderate-income, 23.5 percent were middle-income, and 39.5 percent were upper-income. Of total families, 6,929 (9.2 percent) had incomes below the poverty level. According to HUD, the estimated median family income for the Ocala MSA for 2007 and 2008 was \$42,700 and \$48,800 respectively.

Housing Characteristics

The 2000 census indicates that there were 122,663 housing units in the assessment area, 85,17 (69.4 percent) of which were owner-occupied. The median housing value in the assessment area was \$70,126, which is 24.8 percent lower than the median housing value for the state of Florida at \$93,200. The median age of housing in the assessment area is 17 years compared to the state of Florida at 20 years.

Employment Statistics

The Ocala assessment area is primarily dependent on government, retail trade, construction and health care and social assistance. The largest employers in the assessment area in 2007 were Monroe Regional Medical Center, Emergency One, Inc., and ClosetMaid. The following table shows the unemployment rates for Marion County and the state of Florida for 2006 – 2008.

UNEMPLOYMENT RATES (Not Seasonally Adjusted)			
	2006 (annual)	2007 (annual)	2008 (annual)
Marion County	3.6 %	4.6 %	7.6 %
State of Florida	3.4%	4.0%	6.0%

Business Size Characteristics

The table on page 27 provides key demographic business data by revenue size and census tracts in the assessment area. Based on 2007 Dunn & Bradstreet data, 91.9 percent of the businesses had gross annual revenues of \$1 million or less in the assessment area. For purposes of this report, businesses with \$1 million or less in gross annual revenues are considered to be small businesses.

Competition

The Ocala assessment area is a competitive banking market, with a significant presence of regional and multi-regional banks in this market. According to the June 30, 2008 FDIC/OTS Summary of Deposits Report, 23 financial institutions operated 96 branch offices in the assessment area. Park Avenue Bank operated one (1.0 percent) of the 96 branches, with a deposit market share of 3.4 percent, which ranked 7th in the assessment area. Wachovia Bank, SunTrust Bank, and Regions Bank were the top three with deposit market share of 16.7 percent, 16.6 percent, and 13.3 percent, respectively.

Conclusions With Respect To Performance Tests

The tables on the following pages and in Appendix B and C to this report provide information that was used in analyzing the bank's CRA performance in the assessment area. Certain components of the data in the table are discussed in the evaluation as they apply to particular parts of the analysis.

The tables on the next two pages show demographic and lending data in the Ocala assessment area for the entire review period.

Assessment Area Demographics

Assessment Area: FL Ocala

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.2	472	0.6	180	38.1	12,846	17.1
Moderate-income	3	6.5	3,066	4.1	860	28.0	14,887	19.9
Middle-income	32	69.6	57,715	77.0	5,242	9.1	17,583	23.5
Upper-income	10	21.7	13,674	18.2	647	4.7	29,611	39.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	46	100.0	74,927	100.0	6,929	9.2	74,927	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	888	306	0.4	34.5	446	50.2	136	15.3
Moderate-income	5,332	2,387	2.8	44.8	2,382	44.7	563	10.6
Middle-income	95,237	67,402	79.1	70.8	14,449	15.2	13,386	14.1
Upper-income	21,206	15,076	17.7	71.1	4,307	20.3	1,823	8.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	122,663	85,171	100.0	69.4	21,584	17.6	15,908	13.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	114	0.9	103	0.9	8	1.0	3	1.3
Moderate-income	586	4.7	508	4.5	66	8.6	12	5.2
Middle-income	8,955	72.3	8,287	72.8	515	67.2	153	65.7
Upper-income	2,726	22.0	2,484	21.8	177	23.1	65	27.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	12,381	100.0	11,382	100.0	766	100.0	233	100.0
	Percentage of Total Businesses:			91.9		6.2		1.9

Based on 2000 Census Information.

Loan Distribution Table

Assessment Area: FL Ocala

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	100.0%	1,110	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	50.0%	436	39.3%
Unknown	0	0.0%	0	0.0%	2	50.0%	674	60.7%
Total	4	100.0%	1,110	100.0%	4	100.0%	1,110	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	25.0%	52	9.8%
Middle	4	100.0%	532	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	50.0%	170	32.0%
Unknown	0	0.0%	0	0.0%	1	25.0%	310	58.3%
Total	4	100.0%	532	100.0%	4	100.0%	532	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	12.5%	52	3.2%
Middle	8	100.0%	1,642	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	4	50.0%	606	36.9%
Unknown	0	0.0%	0	0.0%	3	37.5%	984	59.9%
Total	8	100.0%	1,642	100.0%	8	100.0%	1,642	100.0%
SMALL BUSINESS								
	#	%	\$(000s)	%				
By Tract Income								
Low	0	0.0%	0	0.0%				
Moderate	1	6.7%	45	1.3%				
Middle	10	66.7%	2,175	60.9%				
Upper	4	26.7%	1,353	37.9%				
Unknown	0	0.0%	0	0.0%				
Total	15	100.0%	3,573	100.0%				
By Revenue								
\$1 Million or Less	10	66.7%	2,227	62.3%				
Over \$1 Million	5	33.3%	1,346	37.7%				
Not Known	0	0.0%	0	0.0%				
Total	15	100.0%	3,573	100.0%				
By Loan Size								
\$100,000 or less	4	26.7%	248	6.9%				
\$100,001 - \$250,000	6	40.0%	1,050	29.4%				
\$250,001 - \$1 Million	5	33.3%	2,275	63.7%				
Total	15	100.0%	3,573	100.0%				

Originations and Purchases

Lending Test

The Park Avenue Bank's number and dollar volume of small business lending exceeded HMDA lending by both the number and the dollar volume in the Ocala assessment area for the review period. Therefore, greater weight was given to small business lending than HMDA lending in determining the overall bank's lending test rating.

Lending Activity

The bank's lending levels during the review period reflect adequate responsiveness to assessment area credit needs considering its small branch presence. The Park Avenue Bank originated 8 HMDA loans totaling \$1.6 million in the Ocala assessment area. Of the eight HMDA loans, four were home purchase loans and four were home refinance loans. Market share data reports from 2007 indicate the bank ranked 98th out of 475 reporters with a market share of less than 1.0 percent, by number, in the origination and purchase of HMDA loans. The largest market share of HMDA loan originations by a single entity was Countrywide Home Loans at 10.2 percent.

Additionally, the bank originated 15 small business loans totaling \$3.6 million. According to 2007 market share data reports, the bank ranked 26th out of 67 reporters with a market share of less than 1.0 percent, by number, in the origination and purchase of small business loans. The largest market share of small business loans by a single reporting entity was American Express Bank, FSB at 20.2 percent.

Geographic Distribution of Loans

The geographic distribution of loans reflects adequate penetration throughout the assessment area. This assessment area is made up of one low-income census tract, three moderate-income tracts, 32 middle-income tracts, and ten upper-income tracts in the Ocala assessment area. For this analysis, the geographic distribution of HMDA and small business lending was compared with available demographic information. Performance context issues were also considered.

The bank made no HMDA loans in low- and moderate-income tracts. However, the percentages of owner-occupied units in these tracts are 0.4 percent and 2.8 percent, respectively.

For 2007, the aggregate comparison loan distribution table for the Ocala assessment area in Appendix C indicates the bank had no HMDA lending in low- and moderate-income tracts. However, the aggregate performance of HMDA lending in these tracts is only 0.1 percent in low-income tracts and 1.8 percent in moderate-income tracts. Aggregate lending data for 2008 was not available.

The bank made no small business loans in low-income tracts. The percentage of small businesses in low-income tracts is 0.9 percent. However, the bank's small business lending in moderate-income tracts at 6.7 percent was higher than the percentage of small businesses located in these tracts at 4.5 percent.

For 2007, the aggregate performance comparison loan distribution table for the Ocala assessment area in Appendix C indicates the bank made no small business loans in low-income tracts. However, the aggregate performance was only 0.4 percent. Small business lending in moderate-income tracts at 16.7 percent was significantly greater than aggregate performance at 4.1 percent. Aggregate lending data for 2008 was not available.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The bank's lending performance reflects adequate penetration among customers of different income levels and businesses of different sizes. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared with available demographic information. Performance context issues were also considered.

Based on demographic and loan data from the review period, the bank extended no HMDA loans to low-income borrowers. The percentage of low-income families is 17.1 percent. The bank's percentage of HMDA loans to moderate-income borrowers of 12.5 percent was also less than the percentage of moderate-income families in the assessment area of 19.9 percent.

For 2007, the aggregate comparison loan distribution table for the Ocala assessment area in Appendix C indicates the bank had no HMDA lending to low- or moderate-income borrowers. The aggregate performance of HMDA lending is 2.3 percent to low-income borrowers and 10.9 percent to moderate-income borrowers. Aggregate lending data for 2008 was not available.

Of the 15 small business loans, 66.7 percent were originated to businesses with gross annual revenues of \$1 million or less, which is less than the percentage of small businesses in the Ocala assessment area at 91.9 percent. However, the data indicates that 66.7 percent of the small business loans were made in amounts of \$250,000 or less, indicating a willingness to make loans to small businesses.

For 2007, the aggregate comparison loan distribution table for the Ocala assessment area in Appendix C indicates the bank's lending to small businesses at 83.3 percent was significantly greater than aggregate performance at 37.3 percent. Aggregate lending data for 2008 was not available.

Community Development Lending

The Park Avenue Bank makes a relatively high level of community development loans in the Ocala assessment area. The bank made seven loans which provided affordable housing for 704 low-income families.

PARK AVENUE BANK		
OCALA COMMUNITY DEVELOPMENT LOANS		
AFFORDABLE HOUSING PROJECT	UNITS	AMOUNT
St. Lukes Life Center, Ltd.	150	\$190,248
Groves at Victoria Park	122	\$10,000
Pueblo Bonito III	30	\$150,000
Parkside Gardens Apartments	144	\$111,951
The Landings of St. Andrew	196	\$10,000
Tyer Temple Lofts	32	\$12,080
Laurel Gardens	30	\$2,454
Total	704	\$486,733

Product Innovation

The Park Avenue Bank makes use of flexible lending practices in serving the credit needs of the Ocala assessment area. The bank offers several flexible mortgage loan programs through the secondary market for first time and low-income homebuyers, with higher loan-to-value ratios, lower minimum credit scores, and higher debt-to-income ratios allowed. Three secondary market mortgage loans totaling \$366,603 were originated during the review period.

Investment Test

The Park Avenue Bank made an excellent level of qualified community development investments and grants. Qualified investments for the review period totaled \$1.9 million, all of which were prior period investments. The investments consisted of mortgage-backed securities with underlying mortgages relating to LMI individuals or geographies in the assessment area. Please refer to the Investment Test section of the overall institution on page 5 of this evaluation for greater detail. The bank makes extensive use of innovative and complex investments to support CD initiatives in this assessment area. The Park Avenue Bank exhibited

excellent responsiveness to credit and community development needs through its investment activities in the Ocala assessment area.

Service Test

Performance under the service test for the Ocala assessment area is adequate based on the business lending focus of the bank, the proximity of branch locations to area business districts, and the level of community development services.

Accessibility of Delivery Systems

The Park Avenue Bank has one branch office and two ATMs in the Ocala assessment area. Delivery systems are readily accessible to essentially all portions of the bank's assessment area, particularly businesses.

Alternative Delivery Systems

Park Avenue Bank offers alternative systems for delivering retail banking services to its customers, which includes the following: ATMs, direct deposit, remote deposit capture, payroll card accounts, 24-hour telephone banking, and PC banking.

Changes in Branch Locations

Since the previous examination, the bank has not opened or closed any branches in the Ocala assessment area. Thus, the bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.

Reasonableness of Business Hours and Services in Meeting the Assessment Area Needs

Availability of banking services and hours of operations do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. The level of branch services and hours offered by The Park Avenue Bank is consistent throughout the assessment area.

Community Development Services

The Park Avenue Bank provides an adequate level of community development services throughout the Ocala assessment area. Please refer to the bank wide community development services participated in by the bank on page 6.

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
January 1, 2007 through December 31, 2008 - HMDA and small business lending			
March 12, 2007 through April 13, 2009 - Community development lending, investment, and service activity			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Park Avenue Bank, Valdosta, Georgia		HMDA Loans, Small Business Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
Not Applicable	Not Applicable	Not Applicable	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Valdosta, Georgia	Full-scope	Main Office, Valdosta Adel, Georgia	None
Southwest, Georgia	Full-scope		None
Ocala, Florida	Full-scope		None
Atlanta, Georgia	Limited-scope		None
Athens, Georgia	Limited-scope		None
Baxley/Hazlehurst, Georgia	Limited-scope		None
Cook County, Georgia	Limited-scope		None
Gainesville, Georgia	Limited-scope		None
Statesboro, Georgia	Limited-scope		None
Jacksonville, Florida	Limited-scope		None

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES

Assessment Area Demographics

Assessment Area: GA Athens

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	14.3	2,070	7.6	866	41.8	5,933	21.8
Moderate-income	9	25.7	5,824	21.4	1,204	20.7	4,498	16.5
Middle-income	5	14.3	4,215	15.5	401	9.5	5,137	18.9
Upper-income	16	45.7	15,097	55.5	827	5.5	11,638	42.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35	100.0	27,206	100.0	3,298	12.1	27,206	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	6,557	955	4.0	14.6	5,138	78.4	464	7.1
Moderate-income	13,228	4,373	18.2	33.1	8,008	60.5	847	6.4
Middle-income	6,366	3,940	16.4	61.9	2,118	33.3	308	4.8
Upper-income	25,503	14,708	61.3	57.7	9,517	37.3	1,278	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	51,654	23,976	100.0	46.4	24,781	48.0	2,897	5.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1,069	20.3	957	20.1	89	23.1	23	20.7
Moderate-income	890	16.9	796	16.7	76	19.7	18	16.2
Middle-income	636	12.1	565	11.8	60	15.5	11	9.9
Upper-income	2,672	50.7	2,452	51.4	161	41.7	59	53.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,267	100.0	4,770	100.0	386	100.0	111	100.0
	Percentage of Total Businesses:			90.6		7.3		2.1

Based on 2000 Census Information.

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Loan Distribution Table

Assessment Area: GA Athens

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	90	48.4%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	96	51.6%	2	100.0%	186	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	186	100.0%	2	100.0%	186	100.0%
	Refinance							
Low	1	100.0%	170	100.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	170	100.0%
Total	1	100.0%	170	100.0%	1	100.0%	170	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	1	33.3%	170	47.8%	0	0.0%	0	0.0%
Moderate	1	33.3%	90	25.3%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	33.3%	96	27.0%	2	66.7%	186	52.2%
Unknown	0	0.0%	0	0.0%	1	33.3%	170	47.8%
Total	3	100.0%	356	100.0%	3	100.0%	356	100.0%
	SMALL BUSINESS							
	#	%	\$(000s)	%				
	By Tract Income							
Low	5	25.0%	1,745	41.9%				
Moderate	2	10.0%	222	5.3%				
Middle	1	5.0%	50	1.2%				
Upper	12	60.0%	2,147	51.6%				
Unknown	0	0.0%	0	0.0%				
Total	20	100.0%	4,164	100.0%				
	By Revenue							
\$1 Million or Less	8	40.0%	1,631	39.2%				
Over \$1 Million	4	20.0%	1,493	35.9%				
Not Known	8	40.0%	1,040	25.0%				
Total	20	100.0%	4,164	100.0%				
	By Loan Size							
\$100,000 or less	10	50.0%	482	11.6%				
\$100,001 - \$250,000	5	25.0%	782	18.8%				
\$250,001 - \$1 Million	5	25.0%	2,900	69.6%				
Total	20	100.0%	4,164	100.0%				

Originations and Purchases

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Assessment Area Demographics

Assessment Area: GA Atlanta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	3.0	5,677	1.6	1,776	31.3	59,135	17.1
Moderate-income	49	24.4	65,910	19.1	8,023	12.2	63,400	18.4
Middle-income	85	42.3	161,931	46.9	7,326	4.5	80,397	23.3
Upper-income	61	30.3	111,717	32.4	2,336	2.1	142,303	41.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	201	100.0	345,235	100.0	19,461	5.6	345,235	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	8,545	2,781	0.8	32.5	5,118	59.9	646	7.6
Moderate-income	109,981	43,688	13.3	39.7	60,482	55.0	5,811	5.3
Middle-income	240,419	159,102	48.6	66.2	72,326	30.1	8,991	3.7
Upper-income	155,134	122,087	37.3	78.7	27,445	17.7	5,602	3.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	514,079	327,658	100.0	63.7	165,371	32.2	21,050	4.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	921	1.3	800	1.3	90	1.6	31	1.9
Moderate-income	12,557	18.2	10,965	17.8	1,280	22.4	312	18.9
Middle-income	30,918	44.9	27,979	45.5	2,255	39.4	684	41.5
Upper-income	24,487	35.5	21,763	35.4	2,102	36.7	622	37.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	68,883	100.0	61,507	100.0	5,727	100.0	1,649	100.0
	Percentage of Total Businesses:			89.3		8.3		2.4

Based on 2000 Census Information.

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Loan Distribution Table

Assessment Area: GA Atlanta

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	4.3%	35	1.2%
Middle	22	95.7%	2,768	96.9%	2	8.7%	350	12.2%
Upper	1	4.3%	90	3.1%	3	13.0%	145	5.1%
Unknown	0	0.0%	0	0.0%	17	73.9%	2,328	81.5%
Total	23	100.0%	2,858	100.0%	23	100.0%	2,858	100.0%
Refinance								
Low	0	0.0%	0	0.0%	3	10.0%	354	6.2%
Moderate	5	16.7%	917	16.1%	0	0.0%	0	0.0%
Middle	17	56.7%	3,334	58.6%	2	6.7%	393	6.9%
Upper	8	26.7%	1,437	25.3%	10	33.3%	1,407	24.7%
Unknown	0	0.0%	0	0.0%	15	50.0%	3,534	62.1%
Total	30	100.0%	5,688	100.0%	30	100.0%	5,688	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	3	5.7%	354	4.1%
Moderate	5	9.4%	917	10.7%	1	1.9%	35	0.4%
Middle	39	73.6%	6,102	71.4%	4	7.5%	743	8.7%
Upper	9	17.0%	1,527	17.9%	13	24.5%	1,552	18.2%
Unknown	0	0.0%	0	0.0%	32	60.4%	5,862	68.6%
Total	53	100.0%	8,546	100.0%	53	100.0%	8,546	100.0%
SMALL BUSINESS								
	#	%	\$(000s)	%				
By Tract Income								
Low	1	0.6%	200	0.5%				
Moderate	54	30.5%	8,746	22.8%				
Middle	77	43.5%	17,677	46.1%				
Upper	45	25.4%	11,697	30.5%				
Unknown	0	0.0%	0	0.0%				
Total	177	100.0%	38,320	100.0%				
By Revenue								
\$1 Million or Less	79	44.6%	14,579	38.0%				
Over \$1 Million	46	26.0%	14,933	39.0%				
Not Known	52	29.4%	8,808	23.0%				
Total	177	100.0%	38,320	100.0%				
By Loan Size								
\$100,000 or less	91	51.4%	4,076	10.6%				
\$100,001 - \$250,000	36	20.3%	6,355	16.6%				
\$250,001 - \$1 Million	50	28.2%	27,889	72.8%				
Total	177	100.0%	38,320	100.0%				

Originations and Purchases

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Assessment Area Demographics

Assessment Area: GA Baxley/Hazlehurst

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,155	25.0
Moderate-income	1	12.5	1,522	17.7	334	21.9	1,680	19.5
Middle-income	7	87.5	7,085	82.3	1,018	14.4	1,765	20.5
Upper-income	0	0.0	0	0.0	0	0.0	3,007	34.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8	100.0	8,607	100.0	1,352	15.7	8,607	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,419	1,506	16.8	62.3	533	22.0	380	15.7
Middle-income	11,016	7,451	83.2	67.6	1,944	17.6	1,621	14.7
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	13,435	8,957	100.0	66.7	2,477	18.4	2,001	14.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	201	17.9	186	18.5	12	14.5	3	8.1
Middle-income	924	82.1	819	81.5	71	85.5	34	91.9
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,125	100.0	1,005	100.0	83	100.0	37	100.0
	Percentage of Total Businesses:			89.3		7.4		3.3

Based on 2000 Census Information.

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Loan Distribution Table

Assessment Area: GA Baxley/Hazlehurst

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	1	2.9%	62	1.9%
Moderate	7	20.6%	504	15.8%	10	29.4%	651	20.4%
Middle	27	79.4%	2,682	84.2%	6	17.6%	469	14.7%
Upper	0	0.0%	0	0.0%	16	47.1%	1,853	58.2%
Unknown	0	0.0%	0	0.0%	1	2.9%	151	4.7%
Total	34	100.0%	3,186	100.0%	34	100.0%	3,186	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	4	9.1%	152	3.8%
Moderate	9	20.5%	605	15.3%	5	11.4%	211	5.3%
Middle	35	79.5%	3,346	84.7%	7	15.9%	478	12.1%
Upper	0	0.0%	0	0.0%	28	63.6%	3,110	78.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	3,951	100.0%	44	100.0%	3,951	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	8	17.8%	92	7.7%
Moderate	12	26.7%	266	22.2%	13	28.9%	294	24.5%
Middle	33	73.3%	932	77.8%	10	22.2%	207	17.3%
Upper	0	0.0%	0	0.0%	13	28.9%	557	46.5%
Unknown	0	0.0%	0	0.0%	1	2.2%	48	4.0%
Total	45	100.0%	1,198	100.0%	45	100.0%	1,198	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	13	10.6%	306	3.7%
Moderate	28	22.8%	1,375	16.5%	28	22.8%	1,156	13.9%
Middle	95	77.2%	6,960	83.5%	23	18.7%	1,154	13.8%
Upper	0	0.0%	0	0.0%	57	46.3%	5,520	66.2%
Unknown	0	0.0%	0	0.0%	2	1.6%	199	2.4%
Total	123	100.0%	8,335	100.0%	123	100.0%	8,335	100.0%
	SMALL BUSINESS							
	#	%	\$(000s)		%			
	By Tract Income							
Low	0	0.0%	0		0.0%			
Moderate	18	31.6%	1,410		33.6%			
Middle	39	68.4%	2,791		66.4%			
Upper	0	0.0%	0		0.0%			
Unknown	0	0.0%	0		0.0%			
Total	57	100.0%	4,201		100.0%			
	By Revenue							
\$1 Million or Less	19	33.3%	1,829		43.5%			
Over \$1 Million	10	17.5%	996		23.7%			
Not Known	28	49.1%	1,376		32.8%			
Total	57	100.0%	4,201		100.0%			
	By Loan Size							
\$100,000 or less	45	78.9%	1,718		40.9%			
\$100,001 - \$250,000	11	19.3%	2,083		49.6%			
\$250,001 - \$1 Million	1	1.8%	400		9.5%			
Total	57	100.0%	4,201		100.0%			

Originations and Purchases

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Assessment Area Demographics

Assessment Area: GA Cook

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,119	25.9
Moderate-income	1	25.0	1,107	25.7	223	20.1	889	20.6
Middle-income	3	75.0	3,208	74.3	490	15.3	1,002	23.2
Upper-income	0	0.0	0	0.0	0	0.0	1,305	30.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4	100.0	4,315	100.0	713	16.5	4,315	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,641	1,014	23.0	61.8	457	27.8	170	10.4
Middle-income	4,917	3,394	77.0	69.0	1,017	20.7	506	10.3
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	6,558	4,408	100.0	67.2	1,474	22.5	676	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	136	26.5	113	25.3	14	35.9	9	31.0
Middle-income	378	73.5	333	74.7	25	64.1	20	69.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	514	100.0	446	100.0	39	100.0	29	100.0
		Percentage of Total Businesses:		86.8		7.6		5.6

Based on 2000 Census Information.

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Loan Distribution Table

Assessment Area: GA Cook

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	23.5%	382	10.6%	1	5.9%	56	1.5%
Middle	13	76.5%	3,235	89.4%	4	23.5%	227	6.3%
Upper	0	0.0%	0	0.0%	9	52.9%	968	26.8%
Unknown	0	0.0%	0	0.0%	3	17.6%	2,366	65.4%
Total	17	100.0%	3,617	100.0%	17	100.0%	3,617	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	2	8.0%	19	1.1%
Moderate	3	12.0%	62	3.4%	7	28.0%	110	6.1%
Middle	22	88.0%	1,736	96.6%	3	12.0%	83	4.6%
Upper	0	0.0%	0	0.0%	13	52.0%	1,586	88.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	1,798	100.0%	25	100.0%	1,798	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	2	12.5%	17	3.2%
Moderate	5	31.3%	344	65.6%	5	31.3%	36	6.9%
Middle	11	68.8%	180	34.4%	4	25.0%	322	61.5%
Upper	0	0.0%	0	0.0%	5	31.3%	149	28.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	524	100.0%	16	100.0%	524	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	4	6.9%	36	0.6%
Moderate	12	20.7%	788	13.3%	13	22.4%	202	3.4%
Middle	46	79.3%	5,151	86.7%	11	19.0%	632	10.6%
Upper	0	0.0%	0	0.0%	27	46.6%	2,703	45.5%
Unknown	0	0.0%	0	0.0%	3	5.2%	2,366	39.8%
Total	58	100.0%	5,939	100.0%	58	100.0%	5,939	100.0%
	SMALL BUSINESS							
	#	%			\$(000s)			%
	By Tract Income							
Low	0	0.0%			0			0.0%
Moderate	16	37.2%			809			14.6%
Middle	27	62.8%			4,743			85.4%
Upper	0	0.0%			0			0.0%
Unknown	0	0.0%			0			0.0%
Total	43	100.0%			5,552			100.0%
	By Revenue							
\$1 Million or Less	13	30.2%			1,376			24.8%
Over \$1 Million	8	18.6%			1,757			31.6%
Not Known	22	51.2%			2,419			43.6%
Total	43	100.0%			5,552			100.0%
	By Loan Size							
\$100,000 or less	30	69.8%			1,084			19.5%
\$100,001 - \$250,000	6	14.0%			996			17.9%
\$250,001 - \$1 Million	7	16.3%			3,472			62.5%
Total	43	100.0%			5,552			100.0%

Originations and Purchases

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Assessment Area Demographics

Assessment Area: GA Gainesville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	6,740	18.6
Moderate-income	3	13.6	3,635	10.0	818	22.5	6,803	18.8
Middle-income	16	72.7	27,662	76.3	2,089	7.6	8,811	24.3
Upper-income	3	13.6	4,948	13.7	163	3.3	13,891	38.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	22	100.0	36,245	100.0	3,070	8.5	36,245	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,631	1,745	5.2	31.0	3,569	63.4	317	5.6
Middle-income	38,781	26,595	79.0	68.6	9,391	24.2	2,795	7.2
Upper-income	6,634	5,341	15.9	80.5	740	11.2	553	8.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	51,046	33,681	100.0	66.0	13,700	26.8	3,665	7.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,531	24.9	1,306	23.8	183	33.8	42	35.6
Middle-income	3,823	62.1	3,445	62.7	310	57.2	68	57.6
Upper-income	802	13.0	745	13.6	49	9.0	8	6.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,156	100.0	5,496	100.0	542	100.0	118	100.0
	Percentage of Total Businesses:			89.3		8.8		1.9

Based on 2000 Census Information.

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Loan Distribution Table

Assessment Area: GA Gainesville

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	9.1%	680	19.1%	2	18.2%	207	5.8%
Middle	6	54.5%	1,279	36.0%	1	9.1%	239	6.7%
Upper	4	36.4%	1,592	44.8%	3	27.3%	1,682	47.4%
Unknown	0	0.0%	0	0.0%	5	45.5%	1,423	40.1%
Total	11	100.0%	3,551	100.0%	11	100.0%	3,551	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	11.8%	343	6.8%	1	5.9%	39	0.8%
Middle	14	82.4%	4,436	88.2%	1	5.9%	304	6.0%
Upper	1	5.9%	250	5.0%	9	52.9%	3,203	63.7%
Unknown	0	0.0%	0	0.0%	6	35.3%	1,483	29.5%
Total	17	100.0%	5,029	100.0%	17	100.0%	5,029	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	10.7%	1,023	11.9%	3	10.7%	246	2.9%
Middle	20	71.4%	5,715	66.6%	2	7.1%	543	6.3%
Upper	5	17.9%	1,842	21.5%	12	42.9%	4,885	56.9%
Unknown	0	0.0%	0	0.0%	11	39.3%	2,906	33.9%
Total	28	100.0%	8,580	100.0%	28	100.0%	8,580	100.0%
	SMALL BUSINESS							
	#	%	\$(000s)		#		%	
	By Tract Income							
Low	0	0.0%	0		0		0.0%	
Moderate	38	31.7%	8,312		8,312		30.2%	
Middle	76	63.3%	17,916		17,916		65.2%	
Upper	6	5.0%	1,270		1,270		4.6%	
Unknown	0	0.0%	0		0		0.0%	
Total	120	100.0%	27,498		27,498		100.0%	
	By Revenue							
\$1 Million or Less	63	52.5%	15,007		15,007		54.6%	
Over \$1 Million	25	20.8%	5,866		5,866		21.3%	
Not Known	32	26.7%	6,625		6,625		24.1%	
Total	120	100.0%	27,498		27,498		100.0%	
	By Loan Size							
\$100,000 or less	53	44.2%	2,228		2,228		8.1%	
\$100,001 - \$250,000	31	25.8%	5,434		5,434		19.8%	
\$250,001 - \$1 Million	36	30.0%	19,836		19,836		72.1%	
Total	120	100.0%	27,498		27,498		100.0%	

Originations and Purchases

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Assessment Area Demographics

Assessment Area: GA Statesboro

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,164	17.4
Moderate-income	0	0.0	0	0.0	0	0.0	1,913	15.4
Middle-income	7	70.0	8,043	64.6	1,188	14.8	2,396	19.3
Upper-income	3	30.0	4,398	35.4	298	6.8	5,968	48.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	10	100.0	12,441	100.0	1,486	11.9	12,441	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	15,623	7,409	61.5	47.4	6,814	43.6	1,400	9.0
Upper-income	7,119	4,644	38.5	65.2	1,876	26.4	599	8.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	22,742	12,053	100.0	53.0	8,690	38.2	1,999	8.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,248	57.7	1,141	58.1	77	54.2	30	52.6
Upper-income	914	42.3	822	41.9	65	45.8	27	47.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,162	100.0	1,963	100.0	142	100.0	57	100.0
	Percentage of Total Businesses:			90.8		6.6		2.6

Based on 2000 Census Information.

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Loan Distribution Table

Assessment Area: GA Statesboro

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	1	1.7%	36	0.5%
Moderate	0	0.0%	0	0.0%	3	5.0%	167	2.2%
Middle	41	68.3%	5,592	72.7%	9	15.0%	1,615	21.0%
Upper	19	31.7%	2,101	27.3%	33	55.0%	4,048	52.6%
Unknown	0	0.0%	0	0.0%	14	23.3%	1,827	23.7%
Total	60	100.0%	7,693	100.0%	60	100.0%	7,693	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	2	2.6%	32	0.3%
Moderate	0	0.0%	0	0.0%	4	5.3%	264	2.8%
Middle	57	75.0%	7,025	73.7%	12	15.8%	921	9.7%
Upper	19	25.0%	2,509	26.3%	49	64.5%	7,230	75.8%
Unknown	0	0.0%	0	0.0%	9	11.8%	1,087	11.4%
Total	76	100.0%	9,534	100.0%	76	100.0%	9,534	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	50.0%	282	53.5%	2	25.0%	13	2.5%
Upper	4	50.0%	245	46.5%	6	75.0%	514	97.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	527	100.0%	8	100.0%	527	100.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	10	100.0%	2,468	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	10	100.0%	2,468	100.0%
Total	10	100.0%	2,468	100.0%	10	100.0%	2,468	100.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	3	1.9%	68	0.3%
Moderate	0	0.0%	0	0.0%	7	4.5%	431	2.1%
Middle	112	72.7%	15,367	76.0%	23	14.9%	2,549	12.6%
Upper	42	27.3%	4,855	24.0%	88	57.1%	11,792	58.3%
Unknown	0	0.0%	0	0.0%	33	21.4%	5,382	26.6%
Total	154	100.0%	20,222	100.0%	154	100.0%	20,222	100.0%
	SMALL BUSINESS							
	#	%	\$(000s)	%				
	By Tract Income							
Low	0	0.0%	0	0.0%				
Moderate	0	0.0%	0	0.0%				
Middle	89	66.9%	5,834	68.1%				
Upper	44	33.1%	2,729	31.9%				
Unknown	0	0.0%	0	0.0%				
Total	133	100.0%	8,563	100.0%				
	By Revenue							
\$1 Million or Less	54	40.6%	4,013	46.9%				
Over \$1 Million	13	9.8%	1,209	14.1%				
Not Known	66	49.6%	3,341	39.0%				
Total	133	100.0%	8,563	100.0%				
	By Loan Size							
\$100,000 or less	112	84.2%	3,346	39.1%				
\$100,001 - \$250,000	15	11.3%	2,522	29.5%				
\$250,001 - \$1 Million	6	4.5%	2,695	31.5%				
Total	133	100.0%	8,563	100.0%				

Originations and Purchases

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Assessment Area Demographics

Assessment Area: FL Jacksonville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	732	9.1
Moderate-income	0	0.0	0	0.0	0	0.0	899	11.2
Middle-income	1	33.3	1,278	15.9	16	1.3	1,588	19.7
Upper-income	2	66.7	6,771	84.1	180	2.7	4,830	60.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3	100.0	8,049	100.0	196	2.4	8,049	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	1,800	1,557	19.4	86.5	210	11.7	33	1.8
Upper-income	11,781	6,487	80.6	55.1	4,264	36.2	1,030	8.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	13,581	8,044	100.0	59.2	4,474	32.9	1,063	7.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	226	16.4	207	17.2	16	10.5	3	13.0
Upper-income	1,152	83.6	996	82.8	136	89.5	20	87.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,378	100.0	1,203	100.0	152	100.0	23	100.0
	Percentage of Total Businesses:			87.3		11.0		1.7

Based on 2000 Census Information.

APPENDIX B – DEMOGRAPHIC AND HMDA/SMALL BUSINESS LENDING TABLES (Continued)

Loan Distribution Table
Assessment Area: FL Jacksonville

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	SMALL BUSINESS							
	#	%		\$(000s)	%			
	By Tract Income							
Low	0	0.0%		0	0.0%			
Moderate	0	0.0%		0	0.0%			
Middle	0	0.0%		0	0.0%			
Upper	3	100.0%		620	100.0%			
Unknown	0	0.0%		0	0.0%			
Total	3	100.0%		620	100.0%			
	By Revenue							
\$1 Million or Less	0	0.0%		0	0.0%			
Over \$1 Million	2	66.7%		470	75.8%			
Not Known	1	33.3%		150	24.2%			
Total	3	100.0%		620	100.0%			
	By Loan Size							
\$100,000 or less	0	0.0%		0	0.0%			
\$100,001 - \$250,000	3	100.0%		620	100.0%			
\$250,001 - \$1 Million	0	0.0%		0	0.0%			
Total	3	100.0%		620	100.0%			

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Valdosta

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Home Purchase										
Low	9	10.6%	4.3%	3.1%	1.7%	4	4.7%	2.2%	2.8%	1.3%
Moderate	7	8.2%	8.4%	6.8%	4.8%	5	5.9%	1.9%	14.4%	10.2%
Middle	37	43.5%	35.8%	54.0%	50.5%	6	7.1%	6.2%	24.9%	22.7%
Upper	32	37.6%	51.5%	36.1%	43.0%	45	52.9%	65.9%	45.6%	53.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	29.4%	23.8%	12.2%	12.4%
Total	85	100.0%	100.0%	100.0%	100.0%	85	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	5	5.6%	2.7%	4.1%	2.0%	3	3.3%	0.2%	5.5%	2.1%
Moderate	11	12.2%	12.5%	11.1%	8.4%	6	6.7%	2.8%	12.6%	7.6%
Middle	43	47.8%	38.3%	52.9%	50.3%	11	12.2%	6.3%	18.1%	14.3%
Upper	31	34.4%	46.5%	31.9%	39.3%	50	55.6%	66.6%	49.7%	57.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	22.2%	24.2%	14.2%	18.5%
Total	90	100.0%	100.0%	100.0%	100.0%	90	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	5	8.2%	7.2%	5.3%	2.8%	8	13.1%	15.0%	9.6%	3.9%
Moderate	11	18.0%	17.3%	19.7%	13.6%	13	21.3%	8.0%	14.9%	8.0%
Middle	27	44.3%	37.9%	49.9%	47.9%	17	27.9%	36.8%	23.5%	18.1%
Upper	18	29.5%	37.6%	25.2%	35.7%	21	34.4%	34.8%	44.8%	60.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.3%	5.4%	7.2%	9.6%
Total	61	100.0%	100.0%	100.0%	100.0%	61	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	2.4%	35.7%	61.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	97.6%	54.8%	37.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.5%	1.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	19	8.0%	3.4%	3.7%	1.7%	15	6.3%	1.7%	4.3%	1.5%
Moderate	30	12.6%	10.3%	9.6%	11.9%	24	10.1%	2.4%	13.6%	8.1%
Middle	108	45.4%	41.4%	53.3%	49.1%	34	14.3%	7.2%	21.8%	17.2%
Upper	81	34.0%	45.0%	33.4%	37.4%	116	48.7%	60.2%	47.0%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	49	20.6%	28.5%	13.3%	23.1%
Total	238	100.0%	100.0%	100.0%	100.0%	238	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	16	7.3%	7.0%	7.9%	10.5%					
Moderate	55	25.0%	17.7%	21.4%	22.4%					
Middle	79	35.9%	27.0%	36.5%	28.2%					
Upper	70	31.8%	48.2%	30.7%	37.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.4%	1.2%					
Total	220	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	82	37.3%	32.5%	39.1%	54.3%					
By Loan Size										
\$100,000 or less	173	78.6%	28.8%	92.9%	31.6%					
\$100,001-\$250,000	26	11.8%	21.0%	4.0%	20.7%					
\$250,001-\$1 Million	21	9.5%	50.2%	3.1%	47.8%					
Total	220	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Southwest

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	1.4%	4.3%	1.9%
Moderate	3	30.0%	24.2%	27.8%	24.0%	2	20.0%	9.6%	17.7%	11.3%
Middle	7	70.0%	75.8%	72.0%	75.8%	2	20.0%	21.8%	21.0%	18.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	50.0%	67.1%	43.4%	54.8%
Unknown	0	0.0%	0.0%	0.2%	0.2%	0	0.0%	0.0%	13.6%	14.0%
Total	10	100.0%	100.0%	100.0%	100.0%	10	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.6%	1.9%
Moderate	15	32.6%	18.7%	26.7%	24.0%	1	2.2%	1.4%	13.6%	7.9%
Middle	31	67.4%	81.3%	73.2%	76.0%	10	21.7%	10.6%	20.1%	15.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	26	56.5%	69.4%	46.8%	57.8%
Unknown	0	0.0%	0.0%	0.1%	0.1%	9	19.6%	18.6%	14.9%	16.7%
Total	46	100.0%	100.0%	100.0%	100.0%	46	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	8	25.0%	15.8%	13.2%	5.4%
Moderate	9	28.1%	16.8%	26.4%	20.2%	5	15.6%	5.8%	28.5%	18.5%
Middle	23	71.9%	83.2%	73.6%	79.8%	7	21.9%	7.5%	21.5%	22.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	12	37.5%	70.9%	36.8%	53.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	32	100.0%	100.0%	100.0%	100.0%	32	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	62.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	50.0%	37.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	9	10.0%	1.8%	5.4%	2.0%
Moderate	27	30.0%	16.6%	27.1%	24.5%	8	8.9%	2.4%	16.4%	9.4%
Middle	63	70.0%	83.4%	72.7%	75.4%	19	21.1%	9.9%	20.5%	16.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	43	47.8%	60.5%	44.5%	55.7%
Unknown	0	0.0%	0.0%	0.1%	0.1%	11	12.2%	25.4%	13.3%	16.4%
Total	90	100.0%	100.0%	100.0%	100.0%	90	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	44	44.0%	37.8%	32.4%	40.0%					
Middle	56	56.0%	62.2%	64.1%	58.0%					
Upper	0	0.0%	0.0%	0.0%	0.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.5%	1.9%					
Total	100	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	57	57.0%	49.5%	40.2%	48.7%					
By Loan Size										
\$100,000 or less	76	76.0%	29.3%	95.5%	47.2%					
\$100,001-\$250,000	15	15.0%	30.0%	3.1%	24.1%					
\$250,001-\$1 Million	9	9.0%	40.7%	1.4%	28.6%					
Total	100	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: FL Ocala

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.1%	0.1%	0	0.0%	0.0%	1.6%	0.8%
Moderate	0	0.0%	0.0%	1.6%	1.0%	0	0.0%	0.0%	8.9%	5.4%
Middle	2	100.0%	100.0%	83.5%	80.5%	0	0.0%	0.0%	17.3%	13.4%
Upper	0	0.0%	0.0%	14.8%	18.5%	2	100.0%	100.0%	53.5%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.7%	16.8%
Total	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.2%	0.1%	0	0.0%	0.0%	2.6%	1.3%
Moderate	0	0.0%	0.0%	1.9%	1.3%	0	0.0%	0.0%	12.0%	7.5%
Middle	1	100.0%	100.0%	81.1%	78.0%	0	0.0%	0.0%	20.2%	15.6%
Upper	0	0.0%	0.0%	16.9%	20.6%	1	100.0%	100.0%	47.7%	55.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.5%	19.8%
Total	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	2.9%
Moderate	0	0.0%	0.0%	1.9%	1.0%	0	0.0%	0.0%	15.5%	10.4%
Middle	0	0.0%	0.0%	79.7%	77.3%	0	0.0%	0.0%	23.3%	20.8%
Upper	0	0.0%	0.0%	18.4%	21.6%	0	0.0%	0.0%	54.0%	62.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.5%	3.3%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.8%	11.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	64.7%	29.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	23.5%	59.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.1%	0.1%	0	0.0%	0.0%	2.3%	1.1%
Moderate	0	0.0%	0.0%	1.8%	1.3%	0	0.0%	0.0%	10.9%	6.6%
Middle	3	100.0%	100.0%	82.0%	78.3%	0	0.0%	0.0%	19.1%	14.6%
Upper	0	0.0%	0.0%	16.1%	20.3%	3	100.0%	100.0%	50.4%	58.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.2%	19.2%
Total	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)					
Low	0	0.0%	0.0%	0.4%	0.5%					
Moderate	1	16.7%	5.4%	4.1%	6.6%					
Middle	5	83.3%	94.6%	71.7%	63.0%					
Upper	0	0.0%	0.0%	21.3%	28.3%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.6%	1.6%					
Total	6	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	5	83.3%	94.6%	37.3%	33.9%					
By Loan Size										
\$100,000 or less	2	33.3%	11.8%	96.9%	49.1%					
\$100,001-\$250,000	4	66.7%	88.2%	1.7%	15.7%					
\$250,001-\$1 Million	0	0.0%	0.0%	1.4%	35.2%					
Total	6	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Athens

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	5.1%	4.8%	0	0.0%	0.0%	3.7%	2.2%
Moderate	0	0.0%	0.0%	20.0%	14.7%	0	0.0%	0.0%	13.0%	9.4%
Middle	0	0.0%	0.0%	16.1%	14.4%	0	0.0%	0.0%	17.3%	13.7%
Upper	1	100.0%	100.0%	58.8%	66.1%	1	100.0%	100.0%	53.5%	61.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.5%	13.2%
Total	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	4.1%	3.8%	0	0.0%	0.0%	3.1%	1.6%
Moderate	0	0.0%	0.0%	15.3%	12.5%	0	0.0%	0.0%	10.3%	6.3%
Middle	0	0.0%	0.0%	18.3%	13.9%	0	0.0%	0.0%	17.9%	12.8%
Upper	0	0.0%	0.0%	62.2%	69.7%	0	0.0%	0.0%	54.0%	61.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.6%	17.9%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	5.0%	4.1%	0	0.0%	0.0%	6.0%	2.1%
Moderate	0	0.0%	0.0%	19.2%	15.6%	0	0.0%	0.0%	13.5%	6.0%
Middle	0	0.0%	0.0%	17.3%	12.9%	0	0.0%	0.0%	19.8%	17.1%
Upper	0	0.0%	0.0%	58.5%	67.4%	0	0.0%	0.0%	55.3%	63.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.3%	11.5%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	8.6%	12.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.7%	54.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	1.7%	2.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	69.0%	31.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	4.7%	4.7%	0	0.0%	0.0%	3.5%	1.9%
Moderate	0	0.0%	0.0%	18.1%	15.5%	0	0.0%	0.0%	11.9%	7.6%
Middle	0	0.0%	0.0%	16.9%	13.6%	0	0.0%	0.0%	17.5%	12.8%
Upper	1	100.0%	100.0%	60.3%	66.1%	1	100.0%	100.0%	53.4%	58.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.7%	18.9%
Total	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)					
Low	3	21.4%	37.4%	14.1%	17.1%					
Moderate	1	7.1%	1.0%	14.4%	15.7%					
Middle	1	7.1%	1.5%	12.9%	13.5%					
Upper	9	64.3%	60.0%	56.1%	53.1%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.5%	0.5%					
Total	14	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	3	21.4%	24.7%	38.0%	48.3%					
By Loan Size										
\$100,000 or less	6	42.9%	9.5%	92.9%	28.3%					
\$100,001-\$250,000	4	28.6%	17.8%	3.3%	16.3%					
\$250,001-\$1 Million	4	28.6%	72.6%	3.8%	55.5%					
Total	14	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Atlanta

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	1.4%	1.3%	0	0.0%	0.0%	5.4%	3.3%
Moderate	0	0.0%	0.0%	12.0%	9.6%	0	0.0%	0.0%	22.3%	17.2%
Middle	10	100.0%	100.0%	49.8%	44.9%	0	0.0%	0.0%	24.0%	21.8%
Upper	0	0.0%	0.0%	36.8%	44.2%	2	20.0%	5.7%	33.6%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	80.0%	94.3%	14.8%	14.2%
Total	10	100.0%	100.0%	100.0%	100.0%	10	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	1.1%	1.0%	1	10.0%	2.4%	5.2%	3.2%
Moderate	1	10.0%	14.0%	12.3%	10.0%	0	0.0%	0.0%	19.4%	14.9%
Middle	6	60.0%	65.0%	51.2%	46.6%	1	10.0%	10.7%	25.6%	22.8%
Upper	3	30.0%	21.0%	35.4%	42.4%	4	40.0%	26.3%	35.3%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	40.0%	60.6%	14.6%	15.1%
Total	10	100.0%	100.0%	100.0%	100.0%	10	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	1.2%	1.3%	0	0.0%	0.0%	6.6%	3.5%
Moderate	0	0.0%	0.0%	12.8%	12.4%	0	0.0%	0.0%	21.3%	15.2%
Middle	0	0.0%	0.0%	51.0%	43.8%	0	0.0%	0.0%	27.9%	23.0%
Upper	0	0.0%	0.0%	35.0%	42.4%	0	0.0%	0.0%	42.4%	55.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.8%	3.2%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	3.2%	0.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	23.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	44.4%	55.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	19.0%	20.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	1.3%	1.2%	1	5.0%	1.5%	5.3%	3.2%
Moderate	1	5.0%	8.9%	12.2%	10.2%	0	0.0%	0.0%	21.0%	15.8%
Middle	16	80.0%	77.8%	50.4%	45.8%	1	5.0%	6.8%	24.8%	21.7%
Upper	3	15.0%	13.3%	36.1%	42.9%	6	30.0%	18.8%	34.6%	42.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	60.0%	72.9%	14.3%	16.5%
Total	20	100.0%	100.0%	100.0%	100.0%	20	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	1	1.1%	1.1%	1.1%	1.3%					
Moderate	27	31.0%	19.9%	14.1%	16.7%					
Middle	38	43.7%	44.8%	43.1%	42.0%					
Upper	21	24.1%	34.2%	40.5%	39.3%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.2%	0.7%					
Total	87	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	42	48.3%	41.8%	38.5%	43.6%					
By Loan Size										
\$100,000 or less	47	54.0%	11.9%	96.4%	41.6%					
\$100,001-\$250,000	19	21.8%	18.0%	1.6%	12.6%					
\$250,001-\$1 Million	21	24.1%	70.0%	2.0%	45.9%					
Total	87	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Baxley/Hazlehurst

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	2.9%
Moderate	3	15.0%	11.8%	22.6%	22.0%	5	25.0%	19.9%	15.1%	11.9%
Middle	17	85.0%	88.2%	77.4%	78.0%	3	15.0%	13.8%	28.0%	23.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	11	55.0%	57.6%	43.5%	52.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.0%	8.7%	8.6%	9.0%
Total	20	100.0%	100.0%	100.0%	100.0%	20	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.0%	2.8%	4.5%	2.4%
Moderate	6	30.0%	22.8%	17.2%	14.2%	3	15.0%	5.9%	11.0%	7.5%
Middle	14	70.0%	77.2%	82.8%	85.8%	3	15.0%	9.4%	22.3%	18.3%
Upper	0	0.0%	0.0%	0.0%	0.0%	13	65.0%	81.8%	52.5%	62.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.8%	9.3%
Total	20	100.0%	100.0%	100.0%	100.0%	20	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	2	8.3%	7.7%	7.9%	4.9%
Moderate	5	20.8%	21.6%	25.4%	23.8%	8	33.3%	27.4%	28.6%	16.8%
Middle	19	79.2%	78.4%	73.0%	76.0%	6	25.0%	12.0%	23.8%	12.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	8	33.3%	52.9%	38.1%	42.6%
Unknown	0	0.0%	0.0%	1.6%	0.2%	0	0.0%	0.0%	1.6%	23.0%
Total	24	100.0%	100.0%	100.0%	100.0%	24	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	3	4.7%	2.5%	4.9%	2.7%
Moderate	14	21.9%	17.3%	19.8%	17.1%	16	25.0%	17.2%	14.2%	9.3%
Middle	50	78.1%	82.7%	80.0%	82.9%	12	18.8%	12.1%	24.2%	19.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	32	50.0%	64.0%	48.1%	58.5%
Unknown	0	0.0%	0.0%	0.2%	0.0%	1	1.6%	4.2%	8.5%	10.0%
Total	64	100.0%	100.0%	100.0%	100.0%	64	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	9	29.0%	49.6%	13.1%	14.6%					
Middle	22	71.0%	50.4%	83.8%	83.5%					
Upper	0	0.0%	0.0%	0.0%	0.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.1%	1.9%					
Total	31	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	11	35.5%	45.3%	35.2%	67.9%					
By Loan Size										
\$100,000 or less	25	80.6%	49.0%	97.2%	49.4%					
\$100,001-\$250,000	6	19.4%	51.0%	1.7%	18.3%					
\$250,001-\$1 Million	0	0.0%	0.0%	1.1%	32.3%					
Total	31	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Cook

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.6%	2.4%
Moderate	0	0.0%	0.0%	24.9%	27.0%	1	9.1%	5.7%	16.0%	11.7%
Middle	11	100.0%	100.0%	74.7%	71.7%	2	18.2%	8.3%	26.2%	21.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	7	63.6%	74.7%	42.6%	52.9%
Unknown	0	0.0%	0.0%	0.4%	1.2%	1	9.1%	11.3%	10.5%	11.7%
Total	11	100.0%	100.0%	100.0%	100.0%	11	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.4%	3.0%
Moderate	0	0.0%	0.0%	27.8%	31.5%	3	30.0%	3.4%	13.6%	6.0%
Middle	10	100.0%	100.0%	72.2%	68.5%	1	10.0%	4.2%	22.3%	20.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	6	60.0%	92.4%	43.6%	60.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.1%	10.6%
Total	10	100.0%	100.0%	100.0%	100.0%	10	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	1	8.3%	0.4%	14.0%	3.0%
Moderate	4	33.3%	64.9%	27.9%	31.2%	3	25.0%	6.6%	27.9%	9.2%
Middle	8	66.7%	35.1%	72.1%	68.8%	3	25.0%	60.0%	16.3%	19.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	41.7%	32.9%	41.9%	68.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	12	100.0%	100.0%	100.0%	100.0%	12	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	49.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	50.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.0%	0.1%	6.8%	2.7%
Moderate	4	12.1%	13.2%	26.8%	29.8%	7	21.2%	5.1%	15.4%	8.4%
Middle	29	87.9%	86.8%	73.0%	69.7%	6	18.2%	17.4%	23.3%	20.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	18	54.5%	72.4%	43.0%	57.0%
Unknown	0	0.0%	0.0%	0.2%	0.5%	1	3.0%	5.0%	11.6%	11.3%
Total	33	100.0%	100.0%	100.0%	100.0%	33	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Moderate	8	33.3%	11.8%	24.5%	18.2%					
Middle	16	66.7%	88.2%	69.0%	73.6%					
Upper	0	0.0%	0.0%	0.0%	0.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	6.4%	8.2%					
Total	24	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	6	25.0%	12.8%	33.5%	34.9%					
By Loan Size										
\$100,000 or less	19	79.2%	22.5%	95.9%	34.7%					
\$100,001-\$250,000	2	8.3%	9.7%	1.8%	11.0%					
\$250,001-\$1 Million	3	12.5%	67.7%	2.3%	54.3%					
Total	24	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Gainesville

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	2.4%
Moderate	1	16.7%	36.5%	5.4%	3.6%	1	16.7%	5.4%	18.9%	12.4%
Middle	4	66.7%	50.1%	74.7%	73.9%	0	0.0%	0.0%	19.7%	15.3%
Upper	1	16.7%	13.4%	19.8%	22.5%	2	33.3%	40.8%	44.6%	57.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	53.8%	12.6%	12.8%
Total	6	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.4%	2.4%
Moderate	1	14.3%	6.6%	4.5%	3.1%	1	14.3%	1.8%	15.8%	9.9%
Middle	6	85.7%	93.4%	76.0%	76.1%	1	14.3%	13.9%	21.1%	15.3%
Upper	0	0.0%	0.0%	19.5%	20.8%	5	71.4%	84.3%	44.6%	56.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.2%	15.8%
Total	7	100.0%	100.0%	100.0%	100.0%	7	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.5%	4.1%
Moderate	0	0.0%	0.0%	6.1%	3.2%	0	0.0%	0.0%	18.0%	7.9%
Middle	0	0.0%	0.0%	74.3%	80.1%	0	0.0%	0.0%	20.3%	12.8%
Upper	0	0.0%	0.0%	19.6%	16.7%	0	0.0%	0.0%	46.5%	62.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	13.1%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.8%	6.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	81.3%	93.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.0%	2.5%
Moderate	2	15.4%	20.3%	5.1%	3.4%	2	15.4%	3.5%	17.4%	11.0%
Middle	10	76.9%	73.5%	75.3%	75.2%	1	7.7%	7.5%	20.3%	15.1%
Upper	1	7.7%	6.2%	19.6%	21.4%	7	53.8%	64.2%	44.6%	56.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	23.1%	24.8%	12.7%	14.9%
Total	13	100.0%	100.0%	100.0%	100.0%	13	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Moderate	21	35.6%	41.0%	16.8%	24.1%					
Middle	34	57.6%	51.6%	65.8%	65.6%					
Upper	4	6.8%	7.3%	15.3%	9.3%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.1%	1.0%					
Total	59	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	37	62.7%	53.9%	39.3%	52.2%					
By Loan Size										
\$100,000 or less	24	40.7%	8.7%	91.8%	25.6%					
\$100,001-\$250,000	18	30.5%	24.1%	3.7%	15.8%					
\$250,001-\$1 Million	17	28.8%	67.1%	4.6%	58.6%					
Total	59	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: GA Statesboro

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.9%	0.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.3%	6.0%
Middle	14	60.9%	67.4%	68.7%	64.9%	3	13.0%	12.7%	19.3%	17.7%
Upper	9	39.1%	32.6%	31.3%	35.1%	13	56.5%	50.2%	53.0%	58.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	30.4%	37.1%	17.6%	16.9%
Total	23	100.0%	100.0%	100.0%	100.0%	23	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	2	7.7%	1.0%	2.2%	0.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.4%	5.1%
Middle	20	76.9%	82.1%	63.8%	60.5%	6	23.1%	12.4%	19.4%	15.6%
Upper	6	23.1%	17.9%	36.2%	39.5%	15	57.7%	76.0%	59.7%	66.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	11.5%	10.5%	10.3%	11.9%
Total	26	100.0%	100.0%	100.0%	100.0%	26	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.0%	3.2%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.4%	6.1%
Middle	2	66.7%	33.3%	64.1%	65.5%	1	33.3%	5.6%	21.1%	12.6%
Upper	1	33.3%	66.7%	35.9%	34.5%	2	66.7%	94.4%	59.4%	75.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.1%	2.5%
Total	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	83.3%	87.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	12.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	2	3.7%	0.5%	2.3%	0.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.4%	5.6%
Middle	38	70.4%	76.6%	66.3%	63.0%	10	18.5%	11.0%	19.4%	16.5%
Upper	16	29.6%	23.4%	33.7%	37.0%	30	55.6%	57.7%	56.1%	62.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	22.2%	30.8%	13.8%	14.6%
Total	54	100.0%	100.0%	100.0%	100.0%	54	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Moderate	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Middle	43	65.2%	78.3%	62.1%	63.2%	62.1%	63.2%	62.1%	63.2%	
Upper	23	34.8%	21.7%	36.0%	36.3%	36.0%	36.3%	36.0%	36.3%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Tract Unknown	0	0.0%	0.0%	1.9%	0.5%	1.9%	0.5%	1.9%	0.5%	
Total	66	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
By Revenue										
\$1 Million or Less	33	50.0%	60.7%	58.0%	75.3%	58.0%	75.3%	58.0%	75.3%	
By Loan Size										
\$100,000 or less	51	77.3%	29.4%	91.3%	33.0%	91.3%	33.0%	91.3%	33.0%	
\$100,001-\$250,000	10	15.2%	32.4%	4.9%	19.3%	4.9%	19.3%	4.9%	19.3%	
\$250,001-\$1 Million	5	7.6%	38.1%	3.8%	47.7%	3.8%	47.7%	3.8%	47.7%	
Total	66	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	

Originations and Purchases

APPENDIX C – AGGREGATE LENDING TABLES (Continued)

2007 Aggregate Comparison Loan Distribution Table

Assessment Area: FL Jacksonville

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Aggregate %	Aggregate % \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.3%	0.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.0%	7.1%
Middle	0	0.0%	0.0%	6.6%	6.6%	0	0.0%	0.0%	17.8%	12.3%
Upper	0	0.0%	0.0%	93.4%	93.4%	0	0.0%	0.0%	56.1%	67.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.8%	12.6%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.2%	0.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.7%	5.4%
Middle	0	0.0%	0.0%	19.7%	17.0%	0	0.0%	0.0%	20.3%	15.1%
Upper	0	0.0%	0.0%	80.3%	83.0%	0	0.0%	0.0%	58.6%	66.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.1%	12.5%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.0%	1.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.3%	2.7%
Middle	0	0.0%	0.0%	24.0%	25.8%	0	0.0%	0.0%	26.0%	19.1%
Upper	0	0.0%	0.0%	76.0%	74.2%	0	0.0%	0.0%	64.6%	73.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	3.6%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.2%	0.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.3%	6.2%
Middle	0	0.0%	0.0%	13.3%	12.1%	0	0.0%	0.0%	19.3%	13.8%
Upper	0	0.0%	0.0%	86.7%	87.9%	0	0.0%	0.0%	57.6%	67.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.6%	12.4%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank %	Aggregate % \$(000s)	Aggregate %	Aggregate % \$(000s)		Bank %	Aggregate % \$(000s)	Aggregate %	Aggregate % \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	14.0%	11.8%		0.0%	0.0%	14.0%	11.8%
Upper	1	100.0%	100.0%	86.0%	88.2%		0.0%	0.0%	86.0%	88.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Total	1	100.0%	100.0%	100.0%	100.0%		0.0%	0.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	0	0.0%	0.0%	35.8%	45.2%		0.0%	0.0%	35.8%	45.2%
By Loan Size										
\$100,000 or less	0	0.0%	0.0%	96.9%	49.9%		0.0%	0.0%	96.9%	49.9%
\$100,001-\$250,000	1	100.0%	100.0%	1.6%	14.2%		0.0%	0.0%	1.6%	14.2%
\$250,001-\$1 Million	0	0.0%	0.0%	1.6%	35.9%		0.0%	0.0%	1.6%	35.9%
Total	1	100.0%	100.0%	100.0%	100.0%		0.0%	0.0%	100.0%	100.0%

Originations and Purchases

APPENDIX D – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM -	Automated Teller Machine
CDC -	Community Development Corporation
CDFI -	Community Development Financial Institution
CRA -	Community Reinvestment Act (Regulation BB)
FFIEC -	Federal Financial Institutions Examination Council
HMDA -	Home Mortgage Disclosure Act (Regulation C)
LMI -	Low- and Moderate-Income
LTD -	Loan-to-Deposit
MD -	Metropolitan Division
MSA -	Metropolitan Statistical Area
REIS -	Regional Economic Information System

Performance Definitions Regarding Lending

Excellent -	This rating is assigned to an institution with lending performance that substantially exceeds the characteristics of demographic data and aggregate performance.
Good -	This rating is assigned to an institution with lending performance that exceeds the characteristics of demographic data and aggregate performance.
Adequate -	This rating is assigned to an institution with lending performance that is comparable to the characteristics of demographic data and aggregate performance.
Poor -	This rating is assigned to an institution with lending performance that is significantly below the characteristics of demographic data and aggregate performance.

Rounding Convention

Because the percentages presented in tables were rounded to the nearest tenth in most cases, some columns may not total exactly 100 percent.

APPENDIX D – DEFINITIONS AND GENERAL INFORMATION (Continued)

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **Park Avenue Bank** prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **April 13, 2009**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX E - GLOSSARY

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 metropolitan area/assessment area.

Census tract: 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: All Agencies have adopted the following language. Affordable housing (including multi-family 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.

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 nonrelatives 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).

APPENDIX E – GLOSSARY (Continued)

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, 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 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

APPENDIX E – GLOSSARY (Continued)

Multi-family: 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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.