

PUBLIC DISCLOSURE

April 17, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Neighborhood Community Bank
Newnan, Georgia**

RSSD ID Number: 2906311

**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

	PAGE
INSTITUTION'S CRA RATING	2
DESCRIPTION OF INSTITUTION	3
DESCRIPTION OF ASSESSMENT AREA	5
CONCLUSIONS WITH RESPECT TO PREFORMANCE CRITERIA	12
Scope of Examination	12
Loan-to-Deposit Ratio Analysis	17
Assessment Area Concentration	17
Lending to Borrowers of Different Incomes and Businesses of Different Sizes	18
Geographic Distribution of Loans	19
Complaints	21
Compliance With Antidiscrimination Laws	21
APPENDIX A: AGGREGATE LENDING TABLES	22
APPENDIX B: GENERAL INFORMATION AND DEFINITIONS	25

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING

This institution is rated **Satisfactory**.

The bank's average LTD ratio for the past sixteen quarters ended December 31, 2005, was **MORE THAN REASONABLE** given the institution's length of time in operation, size, financial condition, and competition within its assessment area. A **MAJORITY** of the bank's loans were extended to businesses inside the assessment area. The bank's lending reflects a **REASONABLE** penetration among individuals of different incomes, including low- and moderate-income levels, and businesses of different revenue sizes. The geographic distribution of the bank's HMDA loans and commercial loans within its assessment area was analyzed using both 1990 and 2000 demographic data. The geographic distribution of loans reflects **EXCELLENT** dispersion throughout the assessment area. The bank has received no CRA related complaints since the previous examination. In addition, the bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations.

DESCRIPTION OF INSTITUTION

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Neighborhood Community Bank is a small community bank headquartered in Newnan, Georgia. The bank operates three banking offices with ATM services in Coweta and Fayette Counties, which are part of the Atlanta MSA. According to the Consolidated Reports of Condition and Income (Call Report), between January 1, 2002 and December 31, 2005, the bank's total assets increased by 116.5 percent, from \$85.9 million to \$186.1 million. During this same time period, total loans outstanding increased by 119.7 percent, from \$70.6 million to \$155.1 million; and total deposits increased by 123.7 percent, from \$75.5 million to \$168.9 million.

Neighborhood Community Bank is a full service community bank that offers a wide variety of credit products to meet community credit needs. However, the bank's primary focus is to operate as a commercial bank catering to small and medium sized businesses in Coweta and Fayette County, Georgia. The bank also offers traditional consumer loan products including home improvement loans, automobile loans, personal and overdraft protection lines of credit, and home equity lines of credit.

The composition of the loan portfolio, as of the dates listed below, is displayed in the following table:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2005		12/31/2004		12/31/2003	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	66,127	42.6%	41,639	33.8%	20,680	21.1%
Secured by One- to Four- Family Dwellings	14,945	9.6%	14,207	11.5%	12,872	13.2%
Other Real Estate:						
Farmland	0	0.0%	0	0.0%	148	0.2%
Multifamily	2,457	1.6%	2,218	1.8%	2,134	2.2%
Nonfarm nonresidential	47,777	30.8%	44,257	35.9%	42,022	42.9%
Commercial and Industrial	20,934	13.5%	18,160	14.7%	16,964	17.3%
Loans to Individuals	2,835	1.8%	2,806	2.3%	3,025	3.1%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
Total	\$155,075	100.00%	\$123,287	100.00%	\$97,845	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.

As illustrated by the table above, commercial and industrial and non-residential real estate loans made up 44.3 percent of the loan portfolio as of December 31, 2005. These types of loans were sampled as a part of the CRA analysis. These loans will be referred to as "commercial loans" throughout the analysis.

DESCRIPTION OF INSTITUTION (Continued)

Neighborhood Community Bank generally complies with the requirements of the CRA. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas. There were no significant local economic factors that affected the ability of the bank to comply with the regulation.

The bank received a satisfactory CRA rating at its previous evaluation, conducted by the Federal Reserve Bank of Atlanta, dated April 8, 2002.

DESCRIPTION OF ASSESSMENT AREA: Neighborhood Community Bank
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DESCRIPTION OF ASSESSMENT AREA: COWETA AND FAYETTE COUNTIES

Overview

Neighborhood Community Bank operates three banking offices, each with ATM services throughout Coweta and Fayette Counties. Two offices are located in middle-income census tracts and one office is located in an upper-income census tract. Two offices were opened since the previous performance evaluation. As of June 30, 2005, the bank had deposits of \$143.3 million and a deposit market share of 5.4 percent in the Coweta and Fayette County assessment area.

DEMOGRAPHIC DATA

1990 Demographic Data by Census Tract

The following table provides key demographic information from the 1990 census that was used in analyzing the bank's CRA performance. Certain components of the data in the table are discussed in the evaluation as they apply to particular parts of the analysis.

DESCRIPTION OF ASSESSMENT AREA: Neighborhood Community Bank (Continued)

Assessment Area Demographics

Assessment Area: Neighborhood Community 2002 (1990 Census)

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	5,276	15.9
Moderate-income	3	16.7	5,269	15.8	759	14.4	5,366	16.1
Middle-income	7	38.9	12,230	36.7	654	5.3	7,515	22.6
Upper-income	8	44.4	15,780	47.4	291	1.8	15,122	45.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	18	100.0	33,279	100.0	1,704	5.1	33,279	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	7,287	4,503	14.1	61.8	2,281	31.3	503	6.9
Middle-income	16,045	11,621	36.4	72.4	3,194	19.9	1,230	7.7
Upper-income	19,509	15,800	49.5	81.0	2,585	13.3	1,124	5.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	42,841	31,924	100.0	74.5	8,060	18.8	2,857	6.7
	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	789	10.6	721	10.8	39	7.5	29	11.1
Middle-income	2,680	35.9	2,407	36.0	167	32.2	106	40.5
Upper-income	3,991	53.5	3,551	53.2	313	60.3	127	48.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,460	100.0	6,679	100.0	519	100.0	262	100.0
	Percentage of Total Businesses:			89.5		7.0		3.5

Based on 1990 Census Information.

DESCRIPTION OF ASSESSMENT AREA: Neighborhood Community Bank (Continued)
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1990 Housing Characteristics

1990 census data indicates that the median value of housing units in the assessment area was \$97,768, which is 38.3 percent higher than the median housing value for the state at \$70,707. The median age of housing in the assessment area is 10 years compared to the state of Georgia at 18 years.

1990 Poverty Level

As indicated in the table on page 6, there are no low income tracts in the assessment area. Of the families residing in moderate-income tracts, 14.4 percent had incomes below the poverty level. This level of poverty could affect the bank's ability to originate mortgage loans in moderate-tracts without special financing or affordable housing programs. Of total families, 5.1 percent have incomes below the poverty level. The HUD estimated median family income for the Atlanta MSA, which includes Coweta and Fayette Counties, in 2002 was \$71,200, which is significantly higher than the state of Georgia at \$42,200.

2000 Demographic Data by Census Tract

The following tables provide key demographic information from the 2000 census that is used in analyzing the bank's CRA performance. As a result of the Office of Management and Budget's (OMB) revision to census tract delineations in June 2003, tables are provided for both 2003 and 2004 & 2005 assessment area demographics. Certain components of the data in the table are discussed in the evaluation as they apply to particular parts of the analysis.

DESCRIPTION OF ASSESSMENT AREA: Neighborhood Community Bank (Continued)

Assessment Area Demographics

Assessment Area : Neighborhood Community 2003 (2000 Census)

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	6,921	13.6
Moderate-income	1	3.4	1,812	3.6	217	12.0	7,707	15.2
Middle-income	12	41.4	25,006	49.3	1,362	5.4	12,141	23.9
Upper-income	16	55.2	23,955	47.2	460	1.9	24,004	47.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	29	100.0	50,773	100.0	2,039	4.0	50,773	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	2,676	1,648	3.2	61.6	888	33.2	140	5.2
Middle-income	33,489	24,807	47.9	74.1	7,065	21.1	1,617	4.8
Upper-income	29,743	25,363	48.9	85.3	3,195	10.7	1,185	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	65,908	51,818	100.0	78.6	11,148	16.9	2,942	4.5
	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	227	3.0	212	3.2	7	1.4	8	3.0
Middle-income	3,446	46.3	3,086	46.3	233	45.0	127	48.3
Upper-income	3,770	50.7	3,364	50.5	278	53.7	128	48.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,443	100.0	6,662	100.0	518	100.0	263	100.0
	Percentage of Total Businesses:			89.5		7.0		3.5

Based on 2000 Census Information.

DESCRIPTION OF ASSESSMENT AREA: Neighborhood Community Bank (Continued)

Assessment Area Demographics

Assessment Area: Neighborhood Community 2004 & 2005 (2000 Census)

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	6,775	13.3
Moderate-income	1	3.4	1,812	3.6	217	12.0	7,523	14.8
Middle-income	11	37.9	20,403	40.2	1,286	6.3	12,002	23.6
Upper-income	17	58.6	28,558	56.2	536	1.9	24,473	48.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	29	100.0	50,773	100.0	2,039	4.0	50,773	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	2,676	1,648	3.2	61.6	888	33.2	140	5.2
Middle-income	28,026	19,801	38.2	70.7	6,764	24.1	1,461	5.2
Upper-income	35,206	30,369	58.6	86.3	3,496	9.9	1,341	3.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	65,908	51,818	100.0	78.6	11,148	16.9	2,942	4.5
	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	227	3.0	212	3.2	7	1.4	8	3.0
Middle-income	2,940	39.5	2,608	39.1	219	42.3	113	43.0
Upper-income	4,276	57.4	3,842	57.7	292	56.4	142	54.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,443	100.0	6,662	100.0	518	100.0	263	100.0
Percentage of Total Businesses:			89.5		7.0		3.5	

Based on 2000 Census Information.

DESCRIPTION OF ASSESSMENT AREA: Neighborhood Community Bank (Continued)

2000 Housing Characteristics (2000 census and 2004 OMB changes)

2000 census data indicates that the median value of housing units in the assessment area was \$146,119, which is 45.2 percent higher than the median housing value for the state at \$100,600. The median age of housing in the assessment area is 14 years compared to the state of Georgia at 20 years. The OMB changes did not affect the 2000 census data in this regard.

2000 Poverty Level (2000 census and 2004 OMB changes)

As indicated in the tables on page 8 and 9, there are no low income tracts in the assessment area. 12.0 percent of the families residing in moderate-income tracts have incomes below the poverty level. This level of poverty could affect the bank's ability to originate mortgage loans in moderate-tracts without special financing or affordable housing programs. Of total families, 4.0 percent have incomes below the poverty level. The HUD estimated median family income for the Atlanta MSA, which includes Coweta and Fayette Counties, in 2003, 2004, and 2005 was \$68,800, \$67,900, and \$69,300; which is significantly higher than the state of Georgia at \$44,300, \$43,300 and \$44,150, respectively. The OMB changes did not affect the 2000 census data in this regard.

Other Information

Employment Statistics

The assessment area's economy is primarily dependent on retail trade, construction and manufacturing. According to the Bureau of Labor Statistics, the following table shows the unemployment rates for Coweta and Fayette Counties and the state of Georgia from 2003 to 2005. The unemployment rate for Coweta and Fayette Counties are consistently below the unemployment rates for the state of Georgia.

Unemployment Rates			
	2003	2004	2005
Coweta County	4.3%	3.8%	4.6%
Fayette County	3.5%	3.4%	4.3%
State of Georgia	4.8%	4.8%	5.3%

DESCRIPTION OF ASSESSMENT AREA: Neighborhood Community Bank (Continued)
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Competition

The assessment area has a competitive banking market. There are 11 other financial institutions operating 46 offices in Coweta and Fayette Counties. Many of these banks are statewide or multi-regional. According to the June 30, 2005 FDIC Market Share Report, Neighborhood Community Bank had a deposit market share of 5.4 percent. However, local competition has not adversely affected the bank's ability to serve the credit needs of its assessment area.

Community Contacts

As part of the CRA examination, information was obtained from two community contacts regarding local economic conditions and community credit needs. Both contacts were helpful and knowledgeable of the economic conditions in Coweta and Fayette Counties. Both contacts generally had positive comments regarding the degree of involvement of the financial institutions in the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

SCOPE OF EXAMINATION

Neighborhood Community Bank's CRA performance review was based on CRA activities within its assessment area using the small bank examination procedures. The evaluation included an analysis of HMDA loans, and commercial loans originated from January 1, 2002, through December 31, 2005. Because the loan analysis includes loans that were originated before and after MSA and census tract changes made by the Office of Management and Budget (OMB) became effective in 2004, loans extended in 2003 were analyzed separately from loans extended in 2004 and 2005.

For all loans originated in 2002, 1990 census demographic data were used to define the bank's assessment area. The assessment area using this data is defined as 18 census tracts, three of which were moderate-income tracts, seven were middle-income tracts, and eight were upper-income tracts. The bank's assessment area does not include any low-income census tracts.

For all loans originated in 2003, 2000 census demographic data were used to define the bank's assessment area. The assessment area using this data is defined as 29 census tracts, one of which was a moderate-income tract, 12 were middle-income tracts, and 16 were upper-income tracts. The bank's assessment area does not include any low-income census tracts.

For all loans originated in 2004 and 2005, 2000 census demographic data reflecting OMB changes were used to define the bank's assessment area. The assessment area using this data is defined as 29 census tracts, one of which is a moderate-income tract, 11 are middle-income tracts, and 17 are upper-income tracts. The bank's assessment area does not include any low-income census tracts.

The bank's assessment area was reviewed using full scope examination procedures. As indicated earlier in this report, Neighborhood Community Bank focuses primarily on commercial loans, and more small business loans than HMDA loans were made during the entire review period (92 commercial versus 72 HMDA). Because of this, slightly greater weight was given to commercial loans to determine the bank's performance under the CRA. In addition, because of the low number of loans made during 2002, when the bank was relatively new, greater weight was given to the bank's performance during the time period beginning January 1, 2003.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

The tables on the following pages, and additional tables in Appendix A of this report, show Neighborhood Community Bank's lending performance in the Coweta and Fayette County assessment area. Certain components of the data are discussed on the following pages as they apply to particular parts of the analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Loan Distribution Table

Assessment Area: Neighborhood Community 2002

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	28.6%	143	7.4%
Moderate	4	57.1%	586	30.4%	1	14.3%	93	4.8%
Middle	3	42.9%	1,341	69.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	4	57.1%	1,691	87.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	1,927	100.0%	7	100.0%	1,927	100.0%
Refinance								
Low	0	0.0%	0	0.0%	3	23.1%	205	11.9%
Moderate	4	30.8%	392	22.7%	1	7.7%	24	1.4%
Middle	9	69.2%	1,333	77.3%	3	23.1%	322	18.7%
Upper	0	0.0%	0	0.0%	6	46.2%	1,174	68.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	1,725	100.0%	13	100.0%	1,725	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	3	100.0%
Middle	1	100.0%	3	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%	0	0.0%	0	0.0%
Total	1	100.0%	3	100.0%	1	100.0%	3	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%	5	23.8%	348	9.5%
Moderate	8	38.1%	978	26.8%	3	14.3%	120	3.3%
Middle	13	61.9%	2,677	73.2%	3	14.3%	322	8.8%
Upper	0	0.0%	0	0.0%	10	47.6%	2,865	78.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	3,655	100.0%	21	100.0%	3,655	100.0%
COMMERCIAL								
By Tract Income								
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%	1,568	100.0%	2	100.0%	1,568	100.0%
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	2	100.0%	1,568	100.0%	2	100.0%	1,568	100.0%
By Revenue								
\$1 Million or Less	2	100.0%	1,568	100.0%	2	100.0%	1,568	100.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	1,568	100.0%	2	100.0%	1,568	100.0%
By Loan Size								
\$100,000 or less	1	50.0%	68	4.3%	1	50.0%	68	4.3%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	1,568	100.0%	2	100.0%	1,568	100.0%

Originations and Purchases

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Loan Distribution Table

Assessment Area: Neighborhood Community 2003

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	16.7%	75	10.7%
Moderate	4	66.7%	485	69.4%	0	0.0%	0	0.0%
Middle	1	16.7%	64	9.2%	1	16.7%	150	21.5%
Upper	1	16.7%	150	21.5%	4	66.7%	474	67.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	699	100.0%	6	100.0%	699	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	14.3%	15	2.4%
Moderate	2	28.6%	157	25.5%	1	14.3%	78	12.7%
Middle	5	71.4%	458	74.5%	2	28.6%	157	25.5%
Upper	0	0.0%	0	0.0%	3	42.9%	365	59.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	615	100.0%	7	100.0%	615	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	2	100.0%	15	100.0%	1	50.0%	10	66.7%
Upper	0	0.0%	0	0.0%	1	50.0%	5	33.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	15	100.0%	2	100.0%	15	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%	663	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	25	3.8%
Unknown	0	0.0%	0	0.0%	1	50.0%	638	96.2%
Total	2	100.0%	663	100.0%	2	100.0%	663	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	11.8%	90	4.5%
Moderate	6	35.3%	642	32.2%	1	5.9%	78	3.9%
Middle	10	58.8%	1,200	60.2%	4	23.5%	317	15.9%
Upper	1	5.9%	150	7.5%	9	52.9%	869	43.6%
Unknown	0	0.0%	0	0.0%	1	5.9%	638	32.0%
Total	17	100.0%	1,992	100.0%	17	100.0%	1,992	100.0%
COMMERCIAL								
	#	%	\$(000s)		%			
By Tract Income								
Low	0	0.0%	0		0.0%			
Moderate	1	9.1%	71		1.5%			
Middle	8	72.7%	4,336		92.2%			
Upper	2	18.2%	296		6.3%			
Unknown	0	0.0%	0		0.0%			
Total	11	100.0%	4,703		100.0%			
By Revenue								
\$1 Million or Less	8	72.7%	1,507		32.0%			
Over \$1 Million	3	27.3%	3,196		68.0%			
Not Known	0	0.0%	0		0.0%			
Total	11	100.0%	4,703		100.0%			
By Loan Size								
\$100,000 or less	3	27.3%	102		2.2%			
\$100,001 - \$250,000	2	18.2%	349		7.4%			
\$250,001 - \$1 Million	4	36.4%	1,664		35.4%			
Total	11	100.0%	4,703		100.0%			

Originations and Purchases

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Loan Distribution Table

Assessment Area: Neighborhood Community 2004 & 2005

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	9.1%	44	2.0%
Moderate	2	18.2%	298	13.5%	0	0.0%	0	0.0%
Middle	5	45.5%	798	36.1%	0	0.0%	0	0.0%
Upper	4	36.4%	1,112	50.4%	5	45.5%	1,302	59.0%
Unknown	0	0.0%	0	0.0%	5	45.5%	862	39.0%
Total	11	100.0%	2,208	100.0%	11	100.0%	2,208	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	5.0%	272	8.8%	1	5.0%	66	2.1%
Middle	15	75.0%	2,271	73.3%	2	10.0%	542	17.5%
Upper	4	20.0%	557	18.0%	3	15.0%	555	17.9%
Unknown	0	0.0%	0	0.0%	14	70.0%	1,937	62.5%
Total	20	100.0%	3,100	100.0%	20	100.0%	3,100	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	33.3%	10	30.3%
Moderate	1	33.3%	9	27.3%	0	0.0%	0	0.0%
Middle	1	33.3%	10	30.3%	1	33.3%	9	27.3%
Upper	1	33.3%	14	42.4%	1	33.3%	14	42.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	33	100.0%	3	100.0%	33	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%	2	5.9%	54	1.0%
Moderate	4	11.8%	579	10.8%	1	2.9%	66	1.2%
Middle	21	61.8%	3,079	57.6%	3	8.8%	551	10.3%
Upper	9	26.5%	1,683	31.5%	9	26.5%	1,871	35.0%
Unknown	0	0.0%	0	0.0%	19	55.9%	2,799	52.4%
Total	34	100.0%	5,341	100.0%	34	100.0%	5,341	100.0%
COMMERCIAL								
	#	%		\$(000s)	%			
By Tract Income								
Low	0	0.0%		0	0.0%			
Moderate	2	2.5%		380	2.2%			
Middle	50	63.3%		11,379	64.7%			
Upper	27	34.2%		5,829	33.1%			
Unknown	0	0.0%		0	0.0%			
Total	79	100.0%		17,588	100.0%			
By Revenue								
\$1 Million or Less	60	75.9%		10,003	56.9%			
Over \$1 Million	18	22.8%		7,160	40.7%			
Not Known	1	1.3%		425	2.4%			
Total	79	100.0%		17,588	100.0%			
By Loan Size								
\$100,000 or less	52	65.8%		2,495	14.2%			
\$100,001 - \$250,000	7	8.9%		1,238	7.0%			
\$250,001 - \$1 Million	18	22.8%		9,374	53.3%			
Total	79	100.0%		17,587	100.0%			

Originations and Purchases

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Loan-to-Deposit Ratio Analysis

Neighborhood Community Bank's average loan-to-deposit (LTD) ratio for the sixteen-quarter period ended December 31, 2005, was 92.8 percent and is considered **MORE THAN REASONABLE** given the institution's size, financial condition, and assessment area credit needs. The LTD ratio ranged from a high of 102.4 percent as of June 30, 2005, to a low of 87.2 percent as of June 30, 2003. Neighborhood Community Bank's average LTD ratio was compared with the LTD ratio of one financial institution of similar asset size with branch offices in the bank's assessment areas. The LTD ratio for this bank was 98.3 percent.

Assessment Area Concentration

An analysis of the bank's record of lending inside its assessment area was conducted. The review consisted of an analysis of 101 HMDA loans and a sample of 107 commercial loans originated by the bank from January 1, 2002 through December 31, 2005. The following table shows the levels of lending inside and outside the assessment area for each loan type:

Lending Inside and Outside the Assessment Area

Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	6	85.7	\$51	50.5	1	14.3	\$50	49.5
Home Purchase	24	61.5	\$4,834	69.9	15	38.5	\$2,082	30.1
Multi-Family Housing	2	50.0	\$663	37.4	2	50.0	\$1,112	62.6
Refinancing	40	78.4	\$5,440	82.0	11	21.6	\$1,198	18.0
Total HMDA related	72	71.3	\$10,988	71.2	29	28.7	\$4,442	28.8
Total Commercial	92	86.0	\$23,859	81.2	15	14.0	\$5,527	18.8
TOTAL LOANS	164	78.8	\$34,847	77.8	44	21.2	\$9,969	22.2

A **MAJORITY** of Neighborhood Community Bank's HMDA and commercial loans are **IN** the bank's assessment area. As illustrated in the table above, 78.8 percent of the bank's HMDA and commercial loans and 77.8 percent of the loan dollars associated with these loans were originated in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

For this analysis, the distribution of HMDA lending across borrower income levels and commercial lending across business revenue sizes was compared with available demographic information. Performance context issues were also considered, as well as the performance of other banks.

Analysis Based on 1990 Census Data (2002 Loans)

Based on demographic and loan data from the review period, low-income families represented 15.9 percent of total families and received 23.8 percent of Neighborhood Community Bank's HMDA loans, which was significantly higher than the demographic percentage. The bank's percentage of HMDA loans to moderate-income borrowers at 14.3 percent was slightly lower than the percentage of moderate-income families in the assessment area at 16.1 percent. The 2002 peer group loan distribution report for the Coweta and Fayette County assessment area in Appendix A shows that Neighborhood Community Bank's HMDA lending to low-income borrowers at 23.8 percent was significantly higher than the aggregate performance at 7.1 percent. However, the bank's HMDA lending to moderate-income borrowers at 14.3 percent was somewhat lower than aggregate performance at 18.0 percent.

Of the two loans to businesses with reported gross revenues originated by Neighborhood Community Bank in the Coweta and Fayette County assessment area, both were originated to businesses with annual gross revenues of \$1 million or less. Neighborhood Community Bank's percentage of lending at 100 percent is higher than the percentage of businesses with annual gross revenues of \$1 million or less in the assessment area at 89.5 percent.

Analysis Based on 2000 Census Data (2003 Loans)

Based on demographic and loan data from the review period, low-income families represented 13.6 percent of total families and received 11.8 percent of Neighborhood Community Bank's HMDA loans, which was lower than the demographic percentage. The bank's percentage of HMDA loans to moderate-income borrowers at 5.9 percent was significantly lower than the percentage of moderate-income families in the assessment area at 15.2 percent. The 2003 peer group loan distribution report for the Coweta and Fayette County assessment area in Appendix A shows that Neighborhood Community Bank's HMDA lending to low-income borrowers at 11.8 percent was significantly higher than the aggregate performance at 6.1 percent. However, the bank's HMDA lending to moderate-income borrowers at 5.9 percent was significantly lower than aggregate performance at 17.2 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Of the 11 loans to businesses with reported gross revenues originated by Neighborhood Community Bank in the Coweta and Fayette County assessment area, 72.7 percent were originated to businesses with annual gross revenues of \$1 million or less. Neighborhood Community Bank's percentage of lending is somewhat lower than the percentage of businesses with annual gross revenues of \$1 million or less in the assessment area at 89.5 percent.

Analysis Based on 2000 Census Data (2004 & 2005)

Based on demographic and loan data from the review period, low-income families represented 13.3 percent of total families and received 5.9 percent of Neighborhood Community Bank's HMDA loans, which was significantly lower than this percentage. A possible reason for part of this lending disparity is that 4.0 percent of families in the Coweta and Fayette County assessment area have incomes below the poverty level. Typically, families with incomes below the poverty level have difficulty qualifying for HMDA loans without flexible or innovative loan underwriting standards. The bank's percentage of HMDA loans to moderate-income borrowers at 2.9 percent was significantly lower than the percentage of moderate-income families in the assessment area at 14.8 percent.

Of the 79 loans to businesses with reported gross revenues originated by Neighborhood Community Bank in the Coweta and Fayette County assessment area, 75.9 percent were originated to businesses with annual gross revenues of \$1 million or less. Neighborhood Community Bank's percentage of lending at 75.9 percent is somewhat lower than the percentage of businesses with annual gross revenues of \$1 million or less in the assessment area at 89.5 percent.

Based on these factors, Neighborhood Community Bank's record of lending to borrowers of different incomes and businesses of different sizes is considered **REASONABLE**.

Geographic Distribution of Loans

For this analysis the geographic distribution of the bank's HMDA lending and small business lending was compared with the demographic information available. Performance context issues were also considered, as well as the performance of other banks. There are no low-income tracts in the bank's assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Analysis Based on 1990 Census Data (2002 Loans)

As indicated in the demographic tables, there are no low-income tracts in the assessment area. Neighborhood Community Bank's level of HMDA lending in the Coweta and Fayette County assessment area in moderate-income tracts at 38.1 percent is significantly higher than the percentage of owner-occupied units in these tracts at 14.1 percent. The 2002 peer group loan distribution report for the Coweta and Fayette County assessment area in Appendix A shows that Neighborhood Community Bank's HMDA lending in moderate-income tracts at 38.1 percent was significantly higher than the aggregate performance at 11.5 percent.

Neighborhood Community Bank made no commercial loan in moderate-income tracts in the Coweta and Fayette County assessment area. The percentage of small businesses located in these tracts is 10.6 percent. It should be noted that the bank was recently opened in 2002, and there were only two commercial loans from 2002 in the sample.

Analysis Based on 2000 Census Data (2003 Loans)

Neighborhood Community Bank's level of HMDA lending in the Coweta and Fayette County assessment area in moderate-income tracts at 35.3 percent is significantly higher than the percentage of owner-occupied units in these tracts at 3.2 percent. The 2003 peer group loan distribution report for the Coweta and Fayette County assessment area in Appendix A shows that Neighborhood Community Bank's HMDA lending in moderate-income tracts at 35.3 percent was significantly higher than the aggregate performance at 2.6 percent.

Neighborhood Community Bank's commercial lending in moderate-income tracts in the Coweta and Fayette County assessment area at 9.1 percent is significantly higher than the percentage of small businesses located in these tracts at 3.0 percent.

Analysis Based on 2000 Census Data (2004 & 2005 Loans)

Neighborhood Community Bank's level of HMDA lending in the Coweta and Fayette County assessment area in moderate-income tracts at 11.8 percent is significantly higher than the percentage of owner-occupied units in these tracts at 3.2 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Neighborhood Community Bank's commercial lending in moderate-income tracts in the Coweta and Fayette County assessment area at 2.5 percent is comparable to the percentage of small businesses located in these tracts at 3.0 percent.

Based on these factors, Neighborhood Community Bank's geographic distribution of loans reflects **EXCELLENT** dispersion throughout the assessment area.

Responsiveness to Complaints

The bank has not received any CRA-related complaints since the previous examination.

Compliance With Antidiscrimination Laws

Neighborhood Community Bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations. No evidence of discrimination or the use of illegal credit practices was noted during the review of bank policies and procedures. No practices have the intent or the effect of discouraging applicants for credit.

APPENDIX A: AGGREGATE LENDING TABLES

Aggregate Comparison Loan Distribution Table

Assessment Area: Neighborhood Community 2002

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate %	Aggregate %	Aggregate %	#	Bank %	Aggregate %	Aggregate %	Aggregate %
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	28.6%	7.4%	8.1%	5.1%
Moderate	4	57.1%	30.4%	12.5%	9.8%	1	14.3%	4.8%	21.8%	17.5%
Middle	3	42.9%	69.6%	42.8%	39.3%	0	0.0%	0.0%	24.9%	23.8%
Upper	0	0.0%	0.0%	44.7%	50.9%	4	57.1%	87.8%	28.9%	35.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.3%	17.9%
Total	7	100.0%	100.0%	100.0%	100.0%	7	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	3	23.1%	11.9%	6.4%	3.7%
Moderate	4	30.8%	22.7%	10.9%	8.8%	1	7.7%	1.4%	15.9%	11.7%
Middle	9	69.2%	77.3%	40.8%	36.7%	3	23.1%	18.7%	23.4%	20.6%
Upper	0	0.0%	0.0%	48.3%	54.5%	6	46.2%	68.1%	31.9%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	22.3%	23.3%
Total	13	100.0%	100.0%	100.0%	100.0%	13	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%	12.6%	8.6%
Moderate	0	0.0%	0.0%	14.3%	10.5%	1	100.0%	100.0%	18.9%	13.7%
Middle	1	100.0%	100.0%	43.2%	40.8%	0	0.0%	0.0%	31.4%	29.8%
Upper	0	0.0%	0.0%	42.6%	48.7%	0	0.0%	0.0%	34.0%	43.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.1%	4.7%
Total	1	100.0%	100.0%	100.0%	100.0%	1	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%	20.0%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	60.0%	96.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.0%	3.4%	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%	0.0%	0.0%	5	23.8%	9.5%	7.1%	4.2%
Moderate	8	38.1%	26.8%	11.5%	9.1%	3	14.3%	3.3%	18.0%	13.6%
Middle	13	61.9%	73.2%	41.5%	38.0%	3	14.3%	8.8%	24.1%	21.6%
Upper	0	0.0%	0.0%	46.9%	52.9%	10	47.6%	78.4%	30.9%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	19.8%	21.8%
Total	21	100.0%	100.0%	100.0%	100.0%	21	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

APPENDIX A: AGGREGATE LENDING TABLES (Continued)

Aggregate Comparison Loan Distribution Table

Assessment Area: Neighborhood Community 2003

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%	1	16.7%	10.7%	8.3%	5.5%
Moderate	4	66.7%	69.4%	2.9%	2.3%	0	0.0%	0.0%	21.9%	17.4%
Middle	1	16.7%	9.2%	51.4%	45.2%	1	16.7%	21.5%	22.9%	21.5%
Upper	1	16.7%	21.5%	45.7%	52.5%	4	66.7%	67.8%	30.1%	37.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.7%	17.7%
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%	1	14.3%	2.4%	5.1%	3.0%
Moderate	2	28.6%	25.5%	2.4%	1.8%	1	14.3%	12.7%	15.0%	11.1%
Middle	5	71.4%	74.5%	46.4%	41.0%	2	28.6%	25.5%	21.3%	18.9%
Upper	0	0.0%	0.0%	51.2%	57.2%	3	42.9%	59.3%	33.7%	41.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	24.8%	25.1%
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%	9.2%	4.3%
Moderate	0	0.0%	0.0%	3.7%	2.4%	0	0.0%	0.0%	24.1%	16.0%
Middle	2	100.0%	100.0%	50.4%	36.8%	1	50.0%	66.7%	26.8%	21.7%
Upper	0	0.0%	0.0%	45.9%	60.9%	1	50.0%	33.3%	35.7%	49.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	8.9%
Total	2	100.0%	100.0%	100.0%	100.0%	2	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%	75.0%	96.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	3.4%	1	50.0%	3.8%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	96.2%	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	11.8%	4.5%	6.1%	3.7%
Moderate	6	35.3%	32.2%	2.6%	2.0%	1	5.9%	3.9%	17.2%	12.9%
Middle	10	58.8%	60.2%	47.9%	42.4%	4	23.5%	15.9%	21.8%	19.7%
Upper	1	5.9%	7.5%	49.5%	55.7%	9	52.9%	43.6%	32.7%	40.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.9%	32.0%	22.2%	23.1%
Total	17	100.0%	100.0%	100.0%	100.0%	17	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

APPENDIX A: AGGREGATE LENDING TABLES (Continued)

Aggregate Comparison Loan Distribution Table

Assessment Area: Neighborhood Community 2004

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate %	Aggregate %	Aggregate %	#	Bank %	Aggregate %	Aggregate %	Aggregate %
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.9%	4.4%
Moderate	1	16.7%	5.4%	2.8%	2.0%	0	0.0%	0.0%	21.4%	15.8%
Middle	2	33.3%	23.3%	41.3%	35.3%	0	0.0%	0.0%	23.5%	21.8%
Upper	3	50.0%	71.3%	55.9%	62.6%	3	50.0%	55.5%	33.7%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	44.5%	14.5%	14.5%
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%	6.6%	3.8%
Moderate	1	7.7%	13.7%	3.2%	2.2%	1	7.7%	3.3%	17.4%	12.8%
Middle	10	76.9%	68.3%	40.1%	34.5%	0	0.0%	0.0%	23.2%	21.4%
Upper	2	15.4%	17.9%	56.7%	63.4%	3	23.1%	28.0%	33.8%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	69.2%	68.6%	19.1%	18.4%
Total	13	100.0%	100.0%	100.0%	100.0%	13	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	8.1%	4.5%
Moderate	0	0.0%	0.0%	5.5%	3.5%	0	0.0%	0.0%	24.1%	19.9%
Middle	1	100.0%	100.0%	37.3%	28.1%	0	0.0%	0.0%	28.1%	23.9%
Upper	0	0.0%	0.0%	57.2%	68.4%	0	0.0%	0.0%	32.8%	41.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.9%	10.0%
Total	1	100.0%	100.0%	100.0%	100.0%	1	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%	33.3%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	0.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	99.5%	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	5.0%	0.3%	6.8%	4.1%
Moderate	2	10.0%	11.1%	3.1%	2.1%	1	5.0%	2.3%	19.6%	14.4%
Middle	13	65.0%	54.7%	40.6%	34.7%	0	0.0%	0.0%	23.5%	21.6%
Upper	5	25.0%	34.2%	56.3%	63.2%	6	30.0%	36.3%	33.7%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	60.0%	61.0%	16.4%	16.6%
Total	20	100.0%	100.0%	100.0%	100.0%	20	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

APPENDIX B: GENERAL INFORMATION AND DEFINITIONS

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 Community Reinvestment Act (CRA) performance of Neighborhood Community Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of April 17, 2006. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in 12 CFR Part 228.

Income Definitions

Throughout this evaluation, the following definitions are used for the various income levels. These levels are defined in the CRA.

Low-Income - An individual income, or median family income for geographies, that is less than 50 percent of the area median income.

Moderate-Income - An individual income, or median family income for geographies, that is at least 50 percent but less than 80 percent of the area median income.

Middle-Income - An individual income, or median family income for geographies, that is at least 80 percent but less than 120 percent of the area median income.

Upper-Income - An individual income, or median family income for geographies, that is 120 percent or more of the area median income.

APPENDIX B: GENERAL INFORMATION AND DEFINITIONS (Continued)
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Other Definitions

ATM -	Automated Teller Machine
FDIC -	Federal Deposit Insurance Corporation
HMDA -	Home Mortgage Disclosure Act
HUD -	Department of Housing and Urban Development
LTD -	Loan-to-Deposit Ratio
MSA -	Metropolitan Statistical Area

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.