PUBLIC DISCLOSURE

July 16, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Peoples Bank and Trust Company

RSSD ID Number: 237936

310 Broad Street Selma, Alabama 36702

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.

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INSTITUTION

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INSTITUTION'S CRA RATING

This institution is rated **Outstanding**.

The following table indicates the performance level of The Peoples Bank and Trust Company with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	The Peoples Bank and Trust Company PERFORMANCE TESTS						
	Lending Test*	Investment Test	Service Test				
Outstanding	X		X				
High Satisfactory		X					
Low Satisfactory							
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.

Based on a review of the bank's lending record, qualified investments, and services, The Peoples Bank and Trust Company meets the standards for an outstanding level of performance in its assessment areas.

- Lending Test The bank's lending levels reflect EXCELLENT responsiveness to assessment area credit needs. A SUBSTANTIAL MAJORITY of the bank's lending is inside its assessment areas. The distribution of borrowers reflects EXCELLENT penetration among borrowers of different income levels and businesses of various revenue sizes. The geographic distribution reflects EXCELLENT penetration throughout the assessment areas. Considering the level of opportunity and competition in the bank's assessment areas, the bank makes an overall ADEQUATE level of community development loans.
- *Investment Test* Given the level of competition in the bank's full scope assessment areas and the level of opportunities within the market, the bank has a **SIGNIFICANT** level of qualified community development investments and grants. Investments outstanding as of the examination date totaled \$1.7 million and contributions totaled \$265,809.

INSTITUTION (Continued)

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Service Test – The bank's systems for delivering retail banking services are READILY ACCESSIBLE to
all portions of the bank's assessment areas. The bank is a LEADER in proving community development
services.

INSTITUTION (Continued)

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DESCRIPTION OF INSTITUTION

The Peoples Bank and Trust Company is headquartered in Selma, Alabama. The bank is a wholly owned subsidiary of The Peoples BancTrust Company, a one-bank holding company also located in Selma. The bank owns two subsidiaries: Loan Express and Peoples Agency. The bank operates 22 branches and 34 ATMs (21 full-service and 13 cash-only) in central Alabama. During the review period, the bank opened two branches and closed two branches. As of March 31, 2007, the bank had assets totaling \$917.9 million.

The bank's assessment areas have expanded since the previous examination with the opening of new branch locations. For purposes of the CRA, the bank now has six designated assessment areas in Alabama:

- Auburn-Opelika Assessment Area, which consists of Lee County and makes up the Auburn-Opelika, Alabama MSA
- Birmingham Assessment Area, which consists of Shelby and Bibb counties and is part of the Birmingham-Hoover, Alabama MSA
- Greenville Assessment Area, which consists of Butler County and is not part of an MSA
- Montgomery Assessment Area, which consists of Autauga and Elmore counties and is part of the Montgomery, Alabama MSA
- Selma Assessment Area, which consists of Dallas County and is not part of an MSA
- Tuscaloosa Assessment Area, which consists of Tuscaloosa County and makes up the Tuscaloosa, Alabama MSA

The Peoples Bank and Trust Company provides traditional retail and commercial bank products, and trust services. Loan products offered by the bank include adjustable rate residential mortgage loans, residential construction and commercial construction loans, home equity lines of credit, various types of commercial loans including SBA loans, and consumer loans. The bank's primary focus is on small business lending and other commercial purpose loans. The bank operates in a competitive banking market due to the presence of regional, national, and various community banks in its markets.

INSTITUTION (Continued)

The composition of the loan portfolio according to the Consolidated Reports of Condition and Income is presented in the following table:

COMPOSITION OF LOAN PORTFOLIO										
	3/31/2	2007	12/31/	2006	12/31/	2005				
Loan Type	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent				
Construction and Development	143,548	24.4%	145,693	24.7%	102,005	20.7%				
Secured by One- to Four- Family Dwellings	98,731	16.8%	95,742	16.2%	92,168	18.7%				
Other Real Estate:										
Farmland	11,187	1.9%	9,453	1.6%	618	0.1%				
Multifamily	16,576	2.8%	16,077	2.7%	4,930	1.0%				
Nonfarm nonresidential	175,746	29.8%	172,856	29.3%	163,118	33.2%				
Commercial and Industrial	91,211	15.5%	96,305	16.3%	79,903	16.2%				
Loans to Individuals	46,779	7.9%	48,520	8.2%	46,213	9.4%				
Agricultural Loans	5,280	0.9%	4,771	0.8%	3,031	0.6%				
Total	\$589,058	100.00%	\$589,417	100.00%	\$491,986	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 indicated by the table, the bank's loan portfolio as of March 31, 2007, consisted primarily of commercial real estate loans followed by construction and development loans. This is consistent with the bank's focus on financing businesses and business activities. Based on the data provided in the table, the bank has shown loan growth over the period, but the loan mix has remained relatively stable.

The bank actively participates in SBA loan programs such as the 504 program, 75 percent guaranty program, and 85 percent guaranty program. During the review period, the bank originated 10 SBA loans totaling \$3.2 million.

The Peoples Bank and Trust Company generally complies with the requirements of the CRA. No known impediments exist that would restrain the bank from meeting the credit needs of its assessment areas. The bank received a satisfactory CRA rating at its previous evaluation by the Federal Reserve Bank of Atlanta dated October 20, 2003, using the large bank CRA examination procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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SCOPE OF EXAMINATION

The Peoples Bank and Trust Company was evaluated using the CRA Large Institutions Examination Procedures. The examination review period covered HMDA loans and small business loans originated from January 1, 2005 through December 31, 2006. The review period also covered qualified community development loans, investments including contributions and donations, and CRA service activities from November 1, 2003 through March 31, 2007. The Selma and Montgomery Assessment Areas were evaluated using full-scope examination procedures because a substantial amount of lending occurred in these two areas. Furthermore, of the Selma and Montgomery Assessment Areas, greater weight was placed on the Montgomery Assessment Area because of the greater lending volume in that assessment area. The Auburn-Opelika, Greenville, Birmingham, and Tuscaloosa Assessment Areas were evaluated using limited-scope examination procedures. The information presented here under the scope of examination pertains throughout the evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's rating under the lending test is **OUTSTANDING**.

The rating is based on the performance of the bank's lending in the Montgomery Assessment Area and Selma Assessment Area where the greatest percentage of the bank's lending occurred during the review period.

LENDING TEST

Given the bank's market share of deposits in its assessment areas, information gathered from community contacts, and demographic information, lending levels reflect **EXCELLENT** responsiveness to assessment area credit needs. The Peoples Bank and Trust Company originated 879 HMDA loans totaling \$51.9 million within the assessment areas during the review period. Of the 879 HMDA loans, 396 (71.6 percent) were home purchase loans, 146 (82.5 percent) were home refinance loans, 335 (82.1 percent) were home improvement loans. Two multifamily loans were originated. In addition, the bank originated 691 small business loans totaling \$75.4 million in its assessment areas during the review period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (Continued)

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Assessment Area Concentration

A **HIGH PERCENTAGE** of the bank's lending occurred inside its assessment area. The table below shows, by product type, the number and percentage of loans reviewed that were located inside and outside of the bank's assessment areas.

Lending Inside and Outside the Assessment Area

Loan Type		Inside				Outside			
23 1, pc	#	%	\$(000s)	%	#	%	\$(000s)	%	
Home Improvement	335	82.1	\$3,298	76.3	73	17.9	\$1,025	23.7	
Home Purchase -	396	71.6	\$19,647	67.9	157	28.4	\$9,306	32.1	
Multi-Family Housing	2	40.0	\$16,452	95.4	3	60.0	\$788	4.6	
Refinancing	146	82.5	\$12,523	61.7	31	17.5	\$7,777	38.3	
Total HMDA related	879	76.9	\$51,920	73.3	264	23.1	\$18,896	26.7	
Small Business	691	76.1	\$75,422	60.4	217	23.9	\$49,488	39.6	
Small Farm	39	83.0	\$3,201	79.5	8	17.0	\$823	20.5	
TOTAL LOANS	1,609	76.7	\$130,543	65.4	489	23.3	\$69,207	34.6	

Note: Affiliate loans not included

As indicated in the table, 76.9 percent of the HMDA-reportable loans and 76.1 percent of the small business loans are within the bank's assessment areas. This indicates the bank's willingness to originate loans that meet the credit needs of its assessment areas.

Geographic Distribution of Loans

The dispersion of loans reflects **EXCELLENT** penetration throughout the assessment areas. This conclusion was based upon the bank's performance in the Montgomery Assessment Area and Selma Assessment Area, considering performance context information and in comparison to available demographic and aggregate lending data. The analysis of HMDA and small business lending within each assessment area is discussed in greater detail later in the report.

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Borrower Distribution

The distribution of loans reflects **EXCELLENT** penetration among borrowers of different income levels and among businesses of different sizes. This conclusion was based upon the bank's performance in the Montgomery Assessment Area and Selma Assessment Area considering performance context information and in comparison to available demographic and aggregate lending data. The analysis of HMDA and small business lending within each assessment area is discussed in greater detail later in the report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (Continued)

Community Development Lending

The bank made an **ADEQUATE** level of community development loans based on the level of the bank's performance in the Montgomery Assessment Area. The community development lending performance in the Selma Assessment Area was not as favorable because of the lack of viable opportunities. The bank originated 10 community development loans totaling \$4.2 million throughout its combined assessment areas and funded \$1.3 million in loans under a \$2.2 million commitment to an affordable housing multifamily loan consortium. Also, the bank originated two community development loans totaling \$3.2 million located outside of the bank's assessment areas, however, these loans were within proximity of the assessment areas.

INVESTMENT TEST

The bank's rating under the investment test is **HIGH SATISFACTORY**.

Competition and the lack of available direct investments have hampered the bank's ability to engage in a greater level of qualified investments in the immediate Montgomery and Selma assessment areas. Given the level of competition in these full scope assessment areas and the opportunities within the market, The Peoples Bank and Trust Company has a **SIGNIFICANT** level of community development investments and grants. Qualified investments for the entire bank totaled \$2.0 million, which includes investments totaling \$1.7 million and grants and donations totaling \$265,809. These investments included a CRA qualified fund with low- and moderate-income (LMI) mortgage backed securities, which includes mortgages located in four of the counties within the bank's assessment areas and two affordable housing tax credits. The investment test rating was enhanced based on the amount of CRA qualified investments that benefited a broader statewide area that includes the bank's assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS (Continued)

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SERVICE TEST

The bank's rating under the service test is **OUTSTANDING**.

In the Montgomery and Selma Assessment Areas, the bank's systems for delivering retail banking services are **READILY ACCESSIBLE** to all portions of the bank's assessment areas. In the Montgomery Assessment Area, the bank has a branch located in one of the two moderate-income tracts in the assessment area. Also, in the Selma Assessment Area, 50 percent of the bank's branches are located in low-income tracts and one branch is located in a distressed middle-income tract. In both full scope assessment areas, the bank is a **LEADER** in providing community development services.

METROPOLITAN AREA: Montgomery Assessment Area

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DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MONTGOMERY ASSESSMENT AREA

The Peoples Bank and Trust Company's performance in this assessment area was evaluated using full scope examination procedures. The Montgomery Assessment Area includes Autauga County and Elmore County, which are part of the Montgomery, Alabama MSA. Based on population, the Montgomery MSA is the second largest metropolitan area in Alabama. Principal cities and towns located in Autauga and Elmore counties include: Autaugaville, Billingsley, Millbrook, Prattville, Blue Ridge, Coosada, Deatsville, Eclectic, Elmore, Wetumpka, and part of Tallassee. In the Montgomery Assessment Area, the bank currently operates six branches with ATMs, which is 27.3 percent of the bank's total branch network. Additionally, the bank has four cash dispersing ATMs located in the assessment area.

Of the bank's total HMDA lending (inside the combined assessment areas), the Montgomery Assessment Area contained 24.9 percent by number volume and 16.1 percent by dollar volume. Of the bank's total small business lending (inside the combined assessment areas), the Montgomery Assessment Area contained 21 percent by number volume and 22.7 percent by dollar volume.

Demographic and Lending Data

The tables on pages 12 and 13 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 indicates that the population of the Montgomery Assessment Area was 109,545 persons, which represented 31.6 percent of the Montgomery MSA's population of 346,528, and 2.5 percent of the state of Alabama's population of 4,447,100 persons.

Income Characteristics

At the time of the 2000 census, there were 29,997 families in the assessment area. Of these families, 16.7 percent were low-income, 17.4 were moderate-income, 23.5 were middle-income, and 42.4 were upper-income. Of total families, 2,320 (7.7 percent) had incomes below the poverty level. According to HUD, the estimated median family income for the Montgomery MSA for 2005 was \$52,850 and \$55,900 for 2006.

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Housing Characteristics

The 2000 census indicates that there were 43,395 housing units in the assessment area, of which 31,442 (72.5 percent) were owner-occupied. The median housing value in the assessment area at \$85,957 was slightly greater than the median housing value for the Montgomery MSA at \$83,913, and 12 percent greater than the median housing value for the state of Alabama at \$76,700. The median age of housing in the assessment area is 20 years, which is a general indicator that homes may require repairs.

Employment Statistics

2005 REIS data indicates that the largest employment sectors in Autauga and Elmore counties are state and local government, retail trade, and manufacturing. According to www.prattvillechamber.com, some of the largest employers in Autauga County include Autauga County Board of Education (937 employees), International Paper Company (624 employees), and Wal-Mart (600 employees). According to Elmore County Economic Development Authority, some of the largest employers in Elmore County include Russell Corporation (730 employees), GKN Aerospace (725 employees), and Neptune Technologies (530 employees).

The following table shows unemployment rates for the assessment area, MSA, and for the state of Alabama.

UNEMPLOYMENT RATES									
(Not Seasonally Adjusted)									
2005 (annual) 2006 (annual) 2007 (Apr)									
Autauga County	3.3 %	3.0 %	2.1 %						
Elmore County	3.3 %	3.0 %	2.2 %						
Montgomery MSA	3.8 %	3.5 %	2.7 %						
State of Alabama	3.9 %	3.6 %	2.7 %						

Business Size Characteristics

The table on page 12 provides key demographic business data by revenue size and census tracts in the assessment area. Based on the 2000 census, 90.4 percent of the businesses in the assessment area had gross annual revenues of \$1 million or less. For purposes of this report, businesses with \$1 million or less in gross annual revenues are considered small businesses.

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Competition

The Peoples Bank and Trust Company has moderate competition in Autauga and Elmore counties with the presence of some regional, national, and community banks. According to the June 30, 2006 FDIC/OTS Summary of Deposits Report, 14 financial institutions operated 37 branch offices in the assessment area. The Peoples Bank and Trust Company ranked first in the assessment area with a deposit market share of 16.8 percent (\$176.6 million) and 6 of the 37 offices. Colonial Bank National Association and First Community Bank of Central Alabama, ranked second and third in deposit market share at 16.7 percent and 15.1 percent, respectively.

Community Contact

As part of the CRA examination, information was obtained from two community contacts regarding local economic conditions and the opportunities available to local financial institutions to participate in community and economic development initiatives.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The following tables show selected demographic information and The Peoples Bank and Trust Company's lending performance for the Montgomery Assessment Area.

Assessment Area Demographics

Assessment Area: AL Montgomery

Income Categories	1			amilies lact	•			of Family Income		
	#	%		#	%	#	%	#	%	
Low-income	0	0.0		0	0.0	0	0.0	5,004	16.7	
Moderate-income	2	8.3		1,289	4.3	265	20.6	5,205	17.4	
Middle-income	19	79.2		23,684	79.0	1,932	8.2	7,055	23.5	
Upper-income	3	12.5		5,024	16.7	123	2.4	12,733	42.4	
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0	
Total Assessment Area	24	100.0		29,997	100.0	2,320	7.7	29,997	100.0	
	Housing Units by				Housi	ng Types by T	ract			
	Tract		Owner-	Occupie	d	Rental		Vacant		
			#	%	%	#	%	#	%	
Low-income	0		0		0.0	0	0.0	0	0.0	
Moderate-income	2,142		1,425	4.5	66.5	386	18.0	331	15.5	
Middle-income	33,905	2	4,751	78.7	73.0	5,936	17.5	3,218	9.5	
Upper-income	7,348		5,266	16.7	71.7	976	13.3	1,106	15.1	
Unknown-income	0		0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	43,395	3	1,442	100.0	72.5	7,298	16.8	4,655	10.7	
	Total Busine Tract	sses by			Busines	Businesses by Tract & Revenue Size				
			L	ess Than \$1 Millio				Revenue l Reporte		
	#	%		#	%	#	%	#	%	
Low-income	0	0.0		0	0.0	0	0.0	0	0.0	
Moderate-income	208	6.5		189	6.5	8	4.4	11	8.6	
Middle-income	2,326	72.2		2,095	72.0	143	78.6	88	68.8	
Upper-income	687	21.3		627	21.5	31	17.0	29	22.7	
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0	
Total Assessment Area	3,221	100.0		2,911	100.0	182	100.0	128	100.0	
	Percentage of	Total B	usiness	ses:	90.4	_	5.7		4.0	

Based on 2000 Census Information.

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Loan Distribution Table

Assessment Area: AL Montgomery

		Assessi	nent Area:	AL Montgo				
		ъ т		HM	IDA I	D D		
Income Categories	#	By Trac %	t Income	%	#	By Borrov %	ver Income	%
	#	70	\$(000s)		Purchase	70	\$(000s)	70
Low	0	0.0%	0	0.0%	10	12.7%	206	5.4%
Moderate	7	8.9%	185	4.9%	17	21.5%	577	15.2%
Middle	64	81.0%	2,716	71.7%	20	25.3%	816	21.5%
Upper	8	10.1%	886	23.4%	32	40.5%	2,188	57.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	79		3,787	100.0%	79	1	3,787	100.0%
Totat	/9	100.0%	3,/0/		nance	100.0%	3,/6/	100.0%
Low	0	0.0%	0	0.0%	1 8	16.7%	222	6.0%
Moderate	1	2.1%	35	0.9%	15	31.3%	796	21.4%
Middle	44	91.7%	3,379	90.7%	12	25.0%	1,099	29.5%
	3	6.3%	3,379	8.4%	10	20.8%	Ī -	33.2%
Upper Unknown	0		0		3		1,236	
Unknown Total	48	0.0%		0.0%	48	6.3%	373	10.0%
Total	40	100.0%	3,726	100.0%		100.0%	3,726	100.0%
Low	0	0.0%	0	0.0%	provement l 21	33.7%	188	22.20/
Moderate	2	2.2%	9	1.1%	31 28	30.4%	214	22.3% 25.4%
Middle	86	93.5%	775	91.9%	17	18.5%	254	
								30.1%
Upper	4 0	4.3%	59	7.0%	15	16.3%	184	21.8%
Unknown		0.0%	0	0.0%	92	1.1%	3	0.4%
Total	92	100.0%	843	100.0%	Family	100.0%	843	100.0%
Low	0	0.0%	0	0.0%	l 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%
	0		0		0		0	
Upper		0.0%	-	0.0%		0.0%	_	0.0%
Unknown <i>Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	- 0	0.0%	U	0.0%	A Totals	0.0%	U	0.0%
Low	0	0.0%	0	0.0%	1 10tais 1 49	22.4%	616	7.4%
Moderate	10	4.6%	229	2.7%	60	27.4%	1,587	19.0%
Middle	194	88.6%	6,870	82.2%	49	27.4%		26.0%
	15	6.8%	-	15.0%	57	26.0%	2,169	43.2%
Upper Unknown	0	0.0%	1,257 0	0.0%	4	1.8%	3,608	45.2%
Total	219	100.0%	8,356	100.0%	219	100.0%	376 8,356	100.0%
Totat	219	100.0%	0,550		BUSINESS	100.0%	6,330	100.076
		#	Q	%		00s)	•	%
					t Income			
Low		0	0.0	0%	•	0	0.	0%
Moderate		10	6.9	9%	1,0	024	6.	0%
Middle	1	20	82.	.8%	13,	,066	76	.4%
Upper		15	10.	.3%	3,0	015	17	.6%
Unknown		0				0	0.	0%
Total	1	45	100	.0%	17,	105	100	0.0%
				By Re	evenue			
\$1 Million or Less		96	66	2%	12,	049	70	.4%
Over \$1 Million	48		33.	.1%	4,9	926	28	.8%
Not Known		1		7%	1	30	0.	8%
Total	1	45	100	.0%	17,	105	100	0.0%
				By Lo	an Size			
\$100,000 or less	1	05		.4%	4,	170	24	.4%
\$100,001 - \$250,000		21	14.	.5%	3,	709	21	.7%
\$250,001 - \$1 Million		19		.1%	9,2	226	53	.9%
Total	1	45	100	.0%	17,	105	100	0.0%

Originations and Purchases

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LENDING TEST

The bank's lending performance is **EXCELLENT** in the Montgomery Assessment Area. Lending levels reflect **EXCELLENT** responsiveness to assessment area credit needs. The geographic distribution of loans reflects **GOOD** penetration throughout the assessment area. The distribution of borrowers reflects **EXCELLENT** penetration among customers of different income levels and businesses of different revenue sizes. The bank makes an **ADEQUATE** level of community development loans.

Lending Activity

Lending levels during the review period reflect **EXCELLENT** responsiveness to assessment area credit needs. Within the Montgomery Assessment Area, The Peoples Bank and Trust Company originated 219 HMDA loans totaling \$8.4 million. Of the 219 HMDA loans, 79 (36.1 percent) were home purchase loans, 48 (21.9 percent) were home refinance loans, and 92 (42 percent) were home improvement loans. According to 2005 market share data reports, the bank ranked 21st out of 251 reporters in the assessment area, with a market share of 2 percent of the number of HMDA loan originations.

Additionally, the bank originated 145 small business loans totaling \$17.1 million within the assessment area. According to 2005 market share data reports, the bank ranked 12th out of 34 reporters in the assessment area with a market share of 2.7 percent of the number of small business loan originations.

Geographic Distribution of Loans

The Peoples Bank and Trust Company's lending performance reflects **GOOD** penetration throughout the assessment area. For this analysis, the geographic distribution of HMDA lending and small business lending was compared with available demographic information. Performance context issues were also considered, including the performance of other banks.

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The Montgomery Assessment Area contains 24 census tracts of which 2 (8.3 percent) are moderate-income tracts, 19 (79.2 percent) are middle-income tracts, and 3 (12.5 percent) are upper-income tracts. There are no low-income census tracts in the assessment area. The bank made 4.6 percent of its HMDA loans in moderate-income tracts where 4.5 percent of owner-occupied housing units were located. The 2005 aggregate comparison loan distribution table for the Montgomery Assessment Area in Appendix B indicates that the bank's HMDA lending in moderate-income tracts at 3.9 percent was greater than aggregate performance at 2.8 percent.

Of the 145 small business loans originated in the assessment area during the review period, 6.9 percent were originated in moderate-income census tracts, which was comparable to the percentage of small businesses in these tracts at 6.5 percent. The 2005 aggregate comparison loan distribution tables in Appendix B indicates the bank's small business lending in moderate-income tracts at 7 percent, which was greater than aggregate performance at 6.2 percent.

Distribution by Borrower Profile

The Peoples Bank and Trust Company's lending performance reflects **EXCELLENT** 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, including the performance of other banks.

The bank's percentage of HMDA lending to low-income borrowers at 22.4 percent far exceeds the percentage of low-income families in the assessment area at 16.7 percent. Similarly, HMDA lending to moderate-income borrowers at 27.4 percent far exceeded the percentage of moderate-income families at 17.4 percent. The 2005 aggregate comparison loan distribution table for the Montgomery Assessment Area in Appendix B indicates the bank's HMDA lending to low-income borrowers at 24.8 percent was significantly greater than aggregate performance at a mere 5.9 percent. Similarly, the bank's HMDA lending to moderate-income borrowers at 22.5 percent was greater than aggregate performance at 17.4 percent.

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Of the 145 small business loans originated in the assessment area, 66.2 percent were originated to businesses with revenues of \$1 million or less, which is less than the percentage of businesses in Autauga and Elmore counties that are considered small businesses at 90.4 percent. However, the data indicates that a high percentage (72.4 percent) of the small business loans was made in amounts of \$100,000 or less, which typically represents loan amounts requested by small businesses. The 2005 aggregate comparison loan distribution table for the Montgomery Assessment Area in Appendix B indicates the bank's lending to small businesses at 59.2 percent was greater than aggregate performance at 47.9 percent.

METROPOLITAN AREA: Montgomery Assessment Area (Continued)

Community Development Lending

In the Montgomery Assessment Area, the bank made an **ADEQUATE** level of community development loans. Two community development loans, totaling \$458,000, were extended in the assessment area during the review period. One loan was to a redevelopment authority that is building a retail grocery store in a moderate-income area, and one loan is to a county water authority to make upgrades to their operations that operate in a rural and moderate-income area of Autauga County.

INVESTMENT TEST

The bank's level of qualified investments and grants in the Montgomery Assessment Area is **POOR**. The bank made grants and contributions totaling \$23,405 directly to community-based organizations in the assessment area. Competition and the lack of available direct investments have hampered the bank's ability to engage in a greater level of qualified investments in the immediate Montgomery Assessment Area. Please refer to the discussion about qualified investments for the entire bank's assessment areas on page 7 of this report.

SERVICE TEST

The bank's accessibility of delivery systems in the Montgomery Assessment Area is **EXCELLENT**. Of the six branches located in the assessment area, one full-service branch with an ATM and drive through services is located in one of the two moderate-income census tracts in the assessment area. The bank offers a free (no monthly maintenance charge) personal checking account for individuals and various banking services for small business owners. In the Montgomery Assessment Area, the bank currently has 1,371 free personal checking accounts representing \$782,000 in deposits.

RSSD ID Number: 237936

Accessibility of Delivery Systems

Delivery systems, including ATMs and branch locations are **READILY ACCESSIBLE** to all portions of the bank's assessment area. 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:

IBERIABANK – DISTRIBUTION OF BRANCHES AND ATMS MONTGOMERY ASSESSMENT AREA										
TRACT INCOME LEVEL	NUMBER OF BRANCHES OF BRANCHES OF ATMS PERCENTAGE OF TOTAL FAMILIES BUSIN									
Low-Income	NA	NA	NA	NA	NA	NA				
Moderate-Income	1	16.7 %	1	16.7 %	4.3 %	6.5 %				
Middle-Income	4	66.6 %	4	66.6 %	79.0 %	72.2 %				
Upper-Income	1	16.7 %	1	16.7 %	16.7 %	21.3 %				
Total	6	100.0 %	6	100.0 %	100.0 %	100.0 %				

Alternative Delivery Systems

- ATMs
- Visa Debit Card
- Peoples Online Banking (free to personal checking account holders, includes free bill payment services)
- Direct Deposit
- Peoples Accessline (24-hour automatic telephone access to account information)
- Remote Deposit Capture (scan checks at business location and electronically send images to bank for deposit)

Changes in Branch Locations

The bank did not open or close any branch offices in the Montgomery Assessment Area during the review period.

RSSD ID Number: 237936

Community Development Services

The bank is a **LEADER** in providing community development services in the Montgomery Assessment Area. Officers and employees have used their financial expertise and technical assistance to provide financial services that benefit residents in the assessment area. The following table shows the community development services provided by representatives of the bank in this assessment area.

COMMUNITY DEVELOPMENT SERVICES							
MONTGOMERY ASSESSMENT AREA							
ORGANIZATION	POSITION/SERVICE						
Prattville YMCA	A bank employee provides financial expertise by serving on the board of management of this organization that provides community services to LMI individuals. His role in the organization is to award scholarships to LMI individuals.						
Prattville Housing Authority	A bank employee provides financial expertise by serving as a board of director for this organization that promotes affordable housing development.						
Tallapoosa County Career Technical Education Advisory Committee	A bank employee provides financial expertise by serving on the advisory committee of this organization. The employee regularly provides training to local high school students, including those students from LMI families, on how to open and maintain a checking account.						
Tallassee High School	A bank employee provides financial expertise by serving as a regular consultant for junior achievement applied business economics. In the past 14 years he has made 32 visits to the school.						
Montgomery Area Food Bank	A bank employee provides financial expertise by serving on the board of directors, secretary, and on the finance committee of this organization that provides food for LMI individuals.						
Junior Achievement of East Alabama – West GeorgiaThe Greater Tallassee Area Chamber of Commerce	A bank employee provides financial expertise by serving on the board of directors of this organization that teaches students business skills, banking, and economics. A bank employee provides financial expertise by serving as the president of this organization that promotes economic development and job creation.						
Mildred Weedon Blount Educational and Charitable FoundationJunior Achievement of East Alabama – West Georgia	A bank employee provides financial expertise by serving on the board of trustees of this organization that provides scholarships for students, which are based on financial needs. A bank employee provides financial expertise by serving on the board of directors of this organization that teaches students business skills, banking, and economics.						
Mildred Weedon Blount Educational and Charitable Foundation	A bank employee provides financial expertise by serving on the board of trustees of this organization that provides scholarships for students, which are based on financial needs.						

NONMETROPOLITAN STATEWIDE AREA: Selma Assessment Area

RSSD ID Number: 237936

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SELMA, ALABAMA

The Peoples Bank and Trust Company's performance in this assessment area was evaluated using full scope examination procedures. The bank and parent company are headquartered in Selma. Selma is a city located on the banks of the Alabama River in Dallas County, Alabama. Dallas County is not part of an MSA. Valley Grande and Selmont are also communities located in Dallas County. In the Selma Assessment Area, the bank currently operates four full-service branches with ATMs, which is 18.2 percent of the bank's total branch network. Additionally, the bank has seven cash dispersing ATMs located in Selma.

Of the bank's total HMDA lending (inside the combined assessment areas), the Selma Assessment Area contained 21.2 percent by number volume and 12.3 percent by dollar volume. Of the bank's total small business lending (inside the combined assessment areas), the Selma Assessment Area contained 17.8 percent by number volume and 17.7 percent by dollar volume.

Demographic and Lending Data

The tables on pages 22 and 23 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 indicates that the population of the Selma Assessment Area was 46,365 persons, which represented 1 percent of the state of Alabama's population of 4,447,100 persons.

Distressed Middle-Income Nonmetropolitan Geographies

All five of the middle-income census tracts in Dallas County have been designated as "distressed" as defined by the federal banking agencies for 2005 and 2006 based on the three distress triggers: poverty, unemployment, and population loss.

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Income Characteristics

At the time of the 2000 census, there were 12,622 families in the assessment area. Of these families, 34.8 percent were low-income, 14.5 percent were moderate-income, 16.5 percent were middle-income, and 34.2 percent were upper-income. Of total families, a high percentage (27.2 percent) had incomes below the poverty level. The HUD estimated family incomes for the state nonmetropolitan areas in 2005 and 2006, which includes the bank's assessment area, are \$42,800 and \$45,200 respectively.

Housing Characteristics

The 2000 census indicates that there were 20,450 housing units in the assessment area, of which 11,720 (57.3 percent) were owner-occupied. The median housing value in the assessment area at \$57,143 is 25.5 percent less than the median housing value for the state of Alabama at \$76,700. The median age of housing in the assessment area is 29 years, which means homes are likely in need of repairs and updating, which increases the demand for home improvement loans.

Employment Statistics

2005 REIS data indicates that the largest employment sectors in Dallas County are manufacturing, state and local government, retail trade, and health care and social assistance. The following table shows unemployment rates for the assessment area and for the state of Alabama.

UNEMPLOYMENT RATES (Not Seasonally Adjusted)							
	2005 (annual)	2006 (annual)	2007 (Apr)				
Dallas County	7.5 %	7.4 %	5.3 %				
State of Alabama	3.9 %	3.6 %	2.7 %				

Business Size Characteristics

The table on page 22 provides key demographic business data by revenue size and census tract in the assessment area. Based on the 2000 census, 88.2 percent of the businesses in the assessment area had gross annual revenues of \$1 million or less. For purposes of this report, businesses with \$1 million or less in gross annual revenues are considered small businesses.

RSSD ID Number: 237936

Competition

The Peoples Bank and Trust Company has a dominant presence in Selma. According to the June 30, 2006 FDIC/OTS Summary of Deposits Report, 4 financial institutions operated 10 branch offices in the assessment area. The Peoples Bank and Trust Company ranked first in the assessment area with a deposit market share of 44.1 percent (\$240.7 million) and 4 of the 10 offices. The other three banks in the assessment area were Regions Bank with a 26 percent deposit market share, Wachovia Bank with a 17.5 percent deposit market share, and AmSouth Bank with a 12.5 percent deposit market share.

Community Contact

As part of the CRA examination, information was obtained from two community contacts regarding local economic conditions and the opportunities available to local financial institutions to participate in community and economic development initiatives.

RSSD ID Number: 237936

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The following tables show selected demographic information and The Peoples Bank and Trust Company's lending performance for the Selma Assessment Area.

Assessment Area Demographics

Assessment Area: AL Selma

Income Categories	Tract Distribut			amilies act Inco		Families < P Level as ⁹ Families by	% of i	Families by Family Income		
	#	%		#	%	#	%	#	%	
Low-income	2	15.4		1,819	14.4	752	41.3	4,387	34.8	
Moderate-income	5	38.5		4,207	33.3	1,560	37.1	1,831	14.5	
Middle-income	5	38.5		5,542	43.9	1,039	18.7	2,085	16.5	
Upper-income	1	7.7		1,054	8.4	87	8.3	4,319	34.2	
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0	
Total Assessment Area	13	100.0		12,622	100.0	3,438	27.2	12,622	100.0	
	Housing Units by				Housi	ng Types by T	ract			
	Tract		Owner-	Occupie	d	Rental		Vacant		
			#	%	%	#	%	#	%	
Low-income	3,269		1,095	9.3	33.5	1,690	51.7	484	14.8	
Moderate-income	7,319		3,838	32.7	52.4	2,180	29.8	1,301	17.8	
Middle-income	8,231		5,636	48.1	68.5	1,924	23.4	671	8.2	
Upper-income	1,631		1,151	9.8	70.6	327	20.0	153	9.4	
Unknown-income	0		0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	20,450	1	1,720	100.0	57.3 6,121 29.9			2,609 12.8		
	Total Busine Tract	•			Busines	ses by Tract &	Revenu	e Size		
			L	ess Than \$1 Millio				Revenue Not Reported		
	#	%		#	%	#	%	#	%	
Low-income	301	22.9		263	22.7	28	27.5	10	18.9	
Moderate-income	418	31.8		378	32.6	24	23.5	16	30.2	
Middle-income	498	37.9		429	37.0	43	42.2	26	49.1	
Upper-income	98	7.5		90	7.8	7	6.9	1	1.9	
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0	
Total Assessment Area	1,315	100.0		1,160	100.0	102	100.0	53	100.0	
	Percentage of	Total B	usiness	ses:	88.2		7.8		4.0	

Based on 2000 Census Information.

RSSD ID Number: 237936

Loan Distribution Table

NONMETROPOLITAN STATEWIDE AREA: Selma Assessment Area (Continued)

		Ass	sessment Ar	ea: AL Selr	na				
	HMDA								
Income Categories		•	t Income	0.4	,,		ver Income	0.4	
	#	%	\$(000s)	%	# % \$(000s) %				
r	,	1.00/	1 27		Purchase	14.50/	176	5.69/	
Low	1	1.8%	27	0.9%	8	14.5%	176	5.6%	
Moderate	12	21.8%	826	26.4%	16	29.1%	500	16.0%	
Middle	30	54.5%	1,422	45.5%	9	16.4%	426	13.6%	
Upper	12	21.8%	848	27.2%	18	32.7%	1,690	54.1%	
Unknown	0	0.0%	0	0.0%	4	7.3%	331	10.6%	
Total	55	100.0%	3,123	100.0%	55	100.0%	3,123	100.0%	
T	,	2 10/	Refin		i i i		52	1 2.00/	
Low	1	3.1%	14	0.5%	1 9		53	2.0%	
Moderate	5	15.6%	801	30.1%		28.1%	382	14.4%	
Middle	21	65.6%	1,371	51.5%	7	21.9%	381	14.3%	
Upper	5	15.6%	476	17.9%	12	37.5%	1,171	44.0%	
Unknown	0	0.0%	0	0.0%	3	9.4%	675	25.4%	
Total	32	100.0%	2,662	100.0%	32	100.0%	2,662	100.0%	
		1	1		provement		1	1 10.00	
Low	12	12.1%	62	10.0%	24	24.2%	66	10.6%	
Moderate	28	28.3%	97	15.6%	24	24.2%	91	14.7%	
Middle	45	45.5%	415	66.8%	15	15.2%	65	10.5%	
Upper	14	14.1%	47	7.6%	32	32.3%	392	63.1%	
Unknown	0	0.0%	0	0.0%	4	4.0%	7	1.1%	
Total	99 100.0%		621	100.0%	99	100.0%	621	100.0%	
		1			Family			1	
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%	
		1			Totals				
Low	14	7.5%	103	1.6%	33	17.7%	295	4.6%	
Moderate	45	24.2%	1,724	26.9%	49	26.3%	973	15.2%	
Middle	96	51.6%	3,208	50.1%	31	16.7%	872	13.6%	
Upper	31	16.7%	1,371	21.4%	62	33.3%	3,253	50.8%	
Unknown	0	0.0%	0	0.0%	11	5.9%	1,013	15.8%	
Total	186	100.0%	6,406	100.0%	186	100.0%	6,406	100.0%	
		#			BUSINESS	00c)		%	
		π	% \$(000s) By Tract Income				/0		
Low		30	24.4% 4,907			907	7 36.8%		
Moderate		30	24.4%		2,973		22.3%		
Middle		49	39.8%		3,645		27.4%		
Upper		14	39.8% 11.4%		1,794		13.5%		
Unknown		0		0.0%		0		0.0%	
Total	123		100.0%		13,319		100.0%		
	123 100.0% 13,319 100.0% By Revenue							, 0	
\$1 Million or Less		88		71.5%		8,365		62.8%	
Over \$1 Million	34		27.6%		4,949		37.2%		
Not Known	1		0.8%		5		0.0%		
Total	123		100.0%		13,319		100.0%		
	By Loan Size								
\$100,000 or less		87	70	.7%	3,173		23.8%		
\$100,001 - \$250,000		24		.5%	3,832		28.8%		
\$250,001 - \$1 Million		12		8%	6,314		47.4%		
Total		23				319	100.0%		
t	123		100.0%		13,317		100.0%		

Originations and Purchases

RSSD ID Number: <u>237936</u>

NONMETROPOLITAN STATEWIDE AREA: Selma Assessment Area (Continued)

LENDING TEST

The bank's lending performance is **EXCELLENT** in the Selma Assessment Area. Lending levels reflect **EXCELLENT** responsiveness to assessment area credit needs. The geographic distribution of loans reflects **EXCELLENT** penetration throughout the assessment area. The distribution of borrowers reflects **EXCELLENT** penetration among customers of different income levels and businesses of different revenue sizes. The bank makes an **ADEQUATE** level of community development loans.

Lending Activity

Lending levels during the review period reflect **EXCELLENT** responsiveness to assessment area credit needs. The bank far exceeded the assessment area's demographic levels and peer performance when lending to low-and moderate-income borrowers.

Within the Selma Assessment Area, The Peoples Bank and Trust Company originated 186 HMDA loans totaling \$6.4 million. Of the 186 HMDA loans, 55 (29.6 percent) were home purchase loans, 32 (17.2 percent) were home refinance loans, and 99 (53.2 percent) were home improvement loans. According to 2005 market share data reports, the bank ranked first out of 150 reporters in the assessment area, with a market share of 11.8 percent of the number of HMDA loan originations.

Additionally, the bank originated 123 small business loans totaling \$13.3 million within the assessment area. According to 2005 market share data reports, the bank ranked 8th out of 26 reporters in the assessment area with a market share of 6.2 percent of the number of small business loan originations.

Geographic Distribution of Loans

The Peoples Bank and Trust Company's lending performance reflects **EXCELLENT** penetration throughout the assessment area. For this analysis, the geographic distribution of HMDA lending and small business lending was compared with available demographic information. Performance context issues were also considered, including the performance of other banks. In addition, all five of the middle-income census tracts in Dallas County have been designated as "distressed" as defined by the federal banking agencies; as such, the bank's lending performance in these middle-income tracts was also considered in this analysis.

RSSD ID Number: 237936

The Selma Assessment Area contains 13 census tracts of which 2 (15.4 percent) are low-income census tracts, 5 (38.5 percent) are moderate-income tracts, 5 (38.5 percent) are middle-income tracts, and 1 (7.7 percent) is an upper-income tract. The bank made 7.5 percent of its HMDA loans in low-income tracts where 9.3 percent of owner-occupied housing units are located. In moderate-income tracts, the bank made 24.2 percent of its HMDA loans where 32.7 percent of owner-occupied housing units are located. Furthermore, in the distressed middle-income tracts, the bank originated 51.6 percent of its HMDA loans where 48.1 percent of owner-occupied housing units are located. In upper-income tracts, the bank originated 16.7 percent of its HMDA loans where 9.8 percent of owner-occupied housing units are located.

The 2005 aggregate comparison loan distribution table for the Selma Assessment Area in Appendix B indicates that the bank's HMDA lending in low-income tracts at 8.3 percent was greater than the aggregate performance at 4.5 percent. Similarly, the bank's HMDA lending in moderate-income tracts at 21.1 percent was greater than the aggregate performance at 19.5 percent.

As stated earlier in the report, the median age of housing in the assessment area is 29 years; therefore, homes are likely in need of repairs. The bank has responded favorably to the credit needs of the assessment area by making a high level of home improvement loans. 53.2 percent of total HMDA loans originated in the assessment area were home improvement loans. Specifically, the bank originated 12.1 percent of its home improvement loans in low-income tracts, 28.3 percent in moderate-income tracts, and 45.5 percent in distressed middle-income tracts.

Of the 123 small business loans originated in the assessment area during the review period, 24.4 percent were originated in low-income census tracts, which is greater than the percentage of small businesses in these tracts at 22.7 percent. However, in moderate-income tracts, the bank also originated 24.4 percent small business loans, which is less than the percentage of small businesses in these tracts at 32.6 percent. Also, data indicates that the bank originated 39.8 percent of its small business loans in distressed middle-income tracts, which is greater than the percentage of small businesses in these tracts at 37.0 percent. The 2005 aggregate comparison loan distribution tables in Appendix B indicates the bank's small business lending in low-income tracts at 30.0 percent far exceeded the aggregate performance at 12.5 percent. Conversely, small business lending in moderate-income tracts at 20.0 percent was less than aggregate performance at 30.4 percent.

RSSD ID Number: 237936

Distribution by Borrower Profile

The Peoples Bank and Trust Company's lending performance reflects **EXCELLENT** 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, including the performance of other banks.

The bank's percentage of HMDA lending to low-income borrowers at 17.7 percent was less than low-income families in the assessment area at 34.8 percent; however, lending to low-income families may have been affected by the percentage of families with incomes less than the poverty level, at 27.2 percent. Typically, low-income families are most affected by poverty level criteria. HMDA lending to moderate-income borrowers at 26.3 percent was significantly greater than the percentage of moderate-income families at 14.5 percent. The 2005 aggregate comparison loan distribution table for the Selma Assessment Area in Appendix B indicates the bank's HMDA lending to low-income borrowers at 20.2 percent was significantly greater than aggregate performance at a mere 7.8 percent. Similarly, the bank's HMDA lending to moderate-income borrowers at 26.6 percent was greater than aggregate performance at 17.1 percent.

Of the 123 small business loans originated in the assessment area, 71.5 percent were originated to businesses with revenues of \$1 million or less, which is less that the percentage of businesses in Dallas County that are considered small businesses at 88.2 percent. However, the data indicates that a high percentage (70.7 percent) of the small business loans was made in amounts of \$100,000 or less, which typically represents loan amounts requested by small businesses. The 2005 aggregate comparison loan distribution table for the Selma Assessment Area in Appendix B indicates the bank's lending to small businesses at 76.0 percent was greater than aggregate performance at 51.7 percent.

Community Development Lending

In the Selma Assessment Area, the bank makes an **ADEQUATE** level of community development loans based on the available opportunities. Two community development loans, totaling \$414,451, were extended in the assessment area during the review period. One of the loans was to the communications district in Dallas County and one loan was to a community housing development organization to refurbish an affordable housing apartment building.

RSSD ID Number: 237936

INVESTMENT TEST

The bank's level of qualified investments and grants in the Selma Assessment Area is **ADEQUATE**. CRA qualified investments for the assessment area totaled \$523,871, which includes prior period investments of \$427,717 and current period grants and donations totaling \$96,154. The initial investment was for construction of a 56-unit affording housing complex in Selma. Competition and the lack of available direct investments have hampered the bank's ability to engage in a greater level of qualified investments in the immediate Selma Assessment Area. Please refer to the discussion about qualified investments for the entire bank's assessment area on page 7.

SERVICE TEST

The bank's accessibility of delivery systems in the Selma Assessment Area is **EXCELLENT**. Of the four branches located in the assessment area, the bank's main office and one other branch are located in low-income census tracts. In addition, the bank has one branch located in a distressed middle-income tract. The bank offers a free (no monthly maintenance charge) personal checking account for individuals and various banking services for small business owners. In the Selma Assessment Area, the bank currently has 1,345 free checking accounts representing \$782,000 in deposits.

Accessibility of Delivery Systems

Delivery systems, including ATMs and branch locations are **READILY ACCESSIBLE** to all portions of the bank's assessment area. 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:

IBERIABANK – DISTRIBUTION OF BRANCHES AND ATMS SELMA ASSESSMENT AREA									
TRACT INCOME LEVEL NUMBER OF BRANCHES PERCENTAGE OF ATMS NUMBER OF ATMS PERCENTAGE OF TOTAL FAMILIES PERCENTAGE OF TOTAL FAMILIES									
Low-Income	2	50.0 %	2	50.0 %	34.8 %	22.9 %			
Moderate-Income	0	0.0 %	0	0.0 %	14.5 %	31.8 %			
Middle-Income	1	25.0 %	1	25.0 %	16.5 %	37.9 %			
Upper-Income	1	25.0 %	1	25.0 %	34.2 %	7.5 %			
Total	4	100.0 %	4	100.0 %	100.0 %	100.0 %			

RSSD ID Number: 237936

Alternative Delivery Systems

Other types of delivery channels to get retail-banking services to the community in the assessment area include:

- ATMs
- Visa Debit Card
- Peoples Online Banking (free to personal checking account holders, includes free bill payment services)
- Direct Deposit
- Peoples Accessline (24-hour automatic telephone access to account information)
- Remote Deposit Capture (scan checks at business location and electronically send images to bank for deposit)

Changes in Branch Locations

Since the previous examination, the bank opened one branch located in Valley Grande, a distressed middle-income tract (9961.00), and closed one branch located in Plantersville in the same distressed middle-income distressed tract. The bank's record of opening or closing branches has **NOT ADVERSELY AFFECTED** the accessibility of its delivery systems, including LMI geographies and individuals.

Community Development Services

The bank is a **LEADER** in providing community development services in the Selma Assessment Area. Officers and employees have used their financial expertise and technical assistance to provide financial services that benefit residents in the assessment area. The following table shows the community development services provided by representatives of the bank in this assessment area.

RSSD ID Number: 237936

COMMUNITY DEVELOPMENT SERVICES							
SELMA ASSESSMENT AREA							
ORGANIZATION	POSITION/SERVICE						
Habitat for Humanity	A bank employee provides financial expertise by serving as the president of the board of directors of this organization that provides affordable housing for LMI individuals. Another employee serves as the secretary of this organization.						
Dallas County District Court System	A bank employee provides financial expertise by serving as a mediator in the court system for individuals unable to afford attorneys.						
Selma Quarterback Club	A bank employee provides financial expertise as a scholarship administrator for this organization that awards scholarships to students in need of financial assistance.						
Riverfront Market Authority	A bank employee provides financial expertise as the treasurer of this organization that promotes tourism and redevelopment of an area which is located in a low-income census tract.						
Selma Public Schools	A bank employee provides financial expertise by regularly providing bank tours and lectures to LMI students on banking and saving money.						
Selma Community Housing Development Organization	A bank employee provides financial expertise by serving as chairman of this organization that provides affordable housing.						
Downtown Selma Association	A bank employee provides financial expertise by serving on the executive board of this downtown business economic development organization.						
Selma/Dallas County Historic Commission	A bank employee provides financial expertise by serving as the chairman of this organization that promotes economic development.						
Alabama Multifamily Loan Consortium	A bank employee provides financial expertise by serving on the loan committee of this organization that provides affordable housing.						
Sabra Sanctuary	A bank employee provides financial expertise by serving as a board member of this organization that provides shelter for battered families and teaches basic banking skills (credit counseling and checking account maintenance) to victims so they can achieve self-sufficiency.						

METROPOLITAN AND NONMETROPOLITAN STATEWIDE AREAS - LIMITED SCOPE

RSSD ID Number: 237936

The following assessment areas were not reviewed using full 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, are provided. Please refer to the tables in Appendices B and C for information regarding these areas. The table below compares the bank's performance in the individual assessment areas to the full scope area's performance.

Assessment Area	Lending Test	Investment Test	Service Test	
Auburn-Opelika MSA	Consistent	Not Consistent (-)	Not Consistent (–)	
Birmingham MSA	Consistent	Not Consistent (+)	Consistent	
Greenville NonMSA	Consistent	Consistent	Consistent	
Tuscaloosa MSA	Not Consistent (-)	Consistent	Consistent	

APPENDIX A – SCOPE OF EXAMINATION

RSSD ID Number: 237936

TIME PERIOD REVIEWED

The examination review period covered HMDA loans and small business loans originated from January 1, 2005 through December 31, 2006. The review period covered qualified community development loans, investments including contributions and donations, and CRA service activities from November 1, 2003 through March 31, 2007.

FINANCIAL INSTITUTION	PRODUCTS REVIEWED	
The Peoples Bank and Trust Compar	HMDA Loans Small Business Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
Not Applicable	Not Applicable	

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Auburn-Opelika (MSA #12220)	Limited Scope	None	None
Birmingham (MSA #13820)	Limited Scope	None	None
Greenville, Alabama	Limited Scope	None	None
Montgomery (MSA #33860)	Full Scope	Prattville Main Millbrook	None
Selma, Alabama	Full Scope	Selma Main	None
Tuscaloosa (MSA #46220)	Limited Scope	None	None

APPENDIX B

RSSD ID Number: 237936

2005 Aggregate Comparison Loan Distribution Table

Assessment Area: AL Auburn HMDA By Tract Income By Borrower Income **Income Categories** Bank Aggregate Bank Aggregate % \$(000s % \$(000s) % \$(000s % \$(000s) Home Purchase 0.0% 0 0.0% 2.9% 2.4% 15 16.9% 10.3% 6.0% 3.7% Low Moderate 27 30.3% 21.7% 10.4% 11.6% 23 25.8% 21.0% 16.9% 12.7% Middle 58 65.2% 64.4% 63.6% 58.7% 16 18.0% 21.7% 24.3% 23.6% 4.5% 13.9% 23.1% 27.4% 28 31.5% 45.3% 39.3% 49.5% Upper 4 Unknown 0 0.0% 0.0% 0.0% 0.0% 7.9% 1.7% 13.5% 10.4% Total 89 100.0% 100.0% 100.0% 100.0% 89 100.0% 100.0% 100.0% 100.0% Refinance Low 1 12.5% 17.0% 2.5% 1.8% 0.0% 0.0% 5.2% 2.5% Moderate 1 12.5% 1.1% 8.5% 9.2% 3 37.5% 15.6% 15.4% 11.4% 2 37.9% 23.0% 19.9% Middle 5 62.5% 61.0%66.7% 60.9% 25.0% 12.5% 20.9% 22.3% 2 25.0% 18.4% 49.4% Upper 1 28.1% 38.4% Unknown 0 0.0% 0.0% 0.0% 0.0% 12.5% 28.1% 18.0% 16.8% Total 8 100.0% 100.0% 100.0% 100.0% 8 100.0% 100.0% 100.0% 100.0% Home Improvement 0.0% 0 0.0% 0.0% 0.9% 0.2% 0.0% 14.0% 5.4% Low Moderate 0 0.0% 0.0% 10.1% 14.7% 0.0% 0.0% 21.2% 0 11.6% 54.5% 66.7% 54.5% Middle 2 66.7% 71.3% 64.9% 2 28.1% 23.8% 33.3% 45.5% 55.3% 17.6% 20.2% 1 33.3% 45.5% 35.2% Upper 1 Unknown 0 0.0% 0.0% 0.0% 0.0% 0 0.0% 0.0% 1.5% 3.8% 100.0% 100.0% 100.0% 100.0% 100.0% 100.0% Total 100.0% 100.0% Multi-Family Low 0 0.0% 0.0% 33.3% 66.1% 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% 0.0% 55.6% 0.0% 0.0% 0.0% Middle 0 0.0% 28.4% 0 0.0% 0.0% 0.0% 11.1% 5.5% 0 0.0% 0.0% 0.0% 0.0% Upper 0 Unknown 0 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 100.0% 100.0% 0.0% 100.0% 0.0% 0.0% 0.0% 100.0% 100.0% Total 0 100.0% 0 **HMDA** otals Low 1 1.0% 2.7% 2.8% 4.8% 15 15.0% 8.6% 6.1% 3.2% Moderate 28 28.0% 18.3% 9.7% 10.3% 26 26.0% 20.1% 16.6% 11.7% Middle 65.0% 20.0% 24.4% 65 65.0%63.8%58.2% 20 24.0% 21.4% Upper 6 6.0%15.1% 22.5% 26.6% 31 31.0% 41.0% 38.7% 47.5% Unknown 0.0% 0.0% 0.0% 0.0% 8.0% 5.9% 14.7% 16.2% 0 Total 100 100.0% 100.0% 100.0% 100.0% 100 100.0% 100.0% 100.0% 100.0% SMALL BUSINESS By Tract Income Bank Aggregate % \$(000s) % % \$(000s) 9.8% 18.4% Low 6 6.8% 6.5% 5 9.9% Moderate 8.2% 3.5% 10.6% Middle 38 62.3% 49.0% 63.8% 60.7% 12 19.7% 29.1% 19.1% 18.2% Upper Unknown 0 0.0% 0.0% 0.0% 0.0% Tract Unknown 0 0.0% 0.0% 3.5% 0.8% Total 61 100.0% 100.0% 100.0% 100.0% By Revenue \$1 Million or Less 82.0% 50 64.5% 48.3% 56.2% By Loan Size 77.0% 92.0% \$100,000 or less 47 32.9% 33.8%

Originations and Purchases

\$100,001-\$250,000

\$250,001-\$1 Million

9

5

61

28.2%

38.9%

100.0%

4.2%

3.8%

100.0%

17.8%

48.4%

100.0%

14.8%

8.2%

100.0%

APPENDIX B (Continued)

RSSD ID Number: 237936

2005 Aggregate Comparison Loan Distribution Table Assessment Area: AL Birmingham

			Assessment	711 ca. 711						1	
	By Tract Income			me	HMDA II			By Borrower Income			
Income Categories	Bank		Aggre		regate		Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
		i			Home P	Purchase					
Low	0	0.0%	0.0%	0.0%	0.0%	2	8.7%	8.5%	4.1%	2.3%	
Moderate	6	26.1%	18.6%	3.4%	1.9%	4	17.4%	7.2%	16.0%	10.9%	
Middle	11	47.8%	35.6%	24.2%	19.2%	6	26.1%	29.1%	22.7%	18.9%	
Upper	6	26.1%	45.8%	72.3%	78.8%	11	47.8%	55.2%	40.4%	52.6%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.9%	15.3%	
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%	3	25.0%	11.3%	4.0%	1.9%	
Moderate	6	50.0%	48.2%	5.2%	3.0%	2	16.7%	19.2%	11.9%	7.8%	
Middle	1	8.3%	10.4%	20.4%	16.6%	2	16.7%	14.2%	20.4%	15.9%	
Upper	5	41.7%	41.5%	74.4%	80.5%	5	41.7%	55.3%	44.6%	56.3%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	19.0%	18.1%	
Total	12	100.0%	100.0%	100.0%	100.0%	12	100.0%	100.0%	100.0%	100.0%	
		100.070	100.070	1001070		provement	100.070	100.070	100.070	100.070	
Low	0	0.0%	0.0%	0.0%	0.0%	5	25.0%	5.2%	13.5%	4.7%	
Moderate	8	40.0%	12.5%	11.1%	9.5%	8	40.0%	36.2%	22.3%	15.2%	
Middle	9	45.0%	36.5%	33.1%	21.7%	5	25.0%	53.9%	23.8%	20.2%	
Upper	2	10.0%	49.1%	55.7%	68.8%	2	10.0%	4.8%	37.7%	54.1%	
Unknown	0	0.0%	0.0%	0.2%	0.0%	0	0.0%	0.0%	2.6%	5.8%	
Total	20	1		100.0%	100.0%	20	100.0%	100.0%	100.0%	100.0%	
Total	20 100.0% 100.0% 100.0% 100.0% 20 100.0% 100.0% 100.0% Multi-Family							100.070			
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%	11.1%	0.1%	0	0.0%	0.0%	0.0%	0.0%	
Middle	0	0.0%	0.0%	22.2%	2.6%	0	0.0%	0.0%	0.0%	0.0%	
	0	0.0%	0.0%	66.7%	97.3%	0	0.0%	0.0%	0.0%	0.0%	
Upper											
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%	O Totals	0.0%	0.0%	100.0%	100.0%	
T	0	0.0%	0.0%	0.0%	1 1	II.	18.2%	9.1%	4.4%	2.1%	
Low					0.0%	10					
Moderate	20	36.4%	26.8%	4.3%	2.3%	14	25.5%	12.8%	14.8%	9.6%	
Middle	21	38.2%	28.3%	23.2%	18.0%	13	23.6%	26.5%	22.0%	17.5%	
Upper	13	23.6%	44.8%	72.5%	79.7%	18	32.7%	51.6%	41.7%	52.9%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.2%	17.8%	
Total	55	100.0%	100.0%	100.0%	100.0%	55	100.0%	100.0%	100.0%	100.0%	
						BUSINESS					
			By Tract Incom		t Income	come Aggre			ogato		
		#	%		% \$(000s)		%		% \$(000s)		
Low		0	0.0%		0.0%		0.0%		0.0%		
Moderate		21	36.2%		22.7%		4.0%		3.8%		
Middle		24			34.9%				14.6%		
							16.8%				
Upper		13	22.4%		42.4%		74.8%		80.2%		
Unknown						0.0%		0.0%		0.0%	
Tract Unknown				1%	0.0%		4.4%		1.4%		
Total		58 100.0% 100.0% 100.0%				0.0%	100.0%				
			1			evenue	•	ı			
\$1 Million or Less	4	16	79.3	3% 68.4%			42.7%		50.7%		
			1			an Size	-				
\$100,000 or less		37	63.8	8%	22.	.7%	91.3%		31.1%		
\$100,001-\$250,000		12	20.	7%	25.	.8%	4.	3%	16.7%		
\$250,001-\$1 Million		9	15.:	5%	51.	.5%	4.	4.5%		52.1%	
Total		8	100.	0%	100	0.0%	100	0.0%	100.0%		

Originations and Purchases

RSSD ID Number: 237936

2005 Aggregate Comparison Loan Distribution Table Assessment Area: AL Greenville

			1100000011101		L Greenvi	IDA				
1		B	y Tract Inco	me	n.v.	IDA İ	By F	Borrower Inc	come	
Income Categories		Bank	, 11400 11100	Aggı	egate		Bank			regate
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
L		ر م م م		ر م م	1 .	urchase	1	1	ر م	1
Low	0	0.0%	0.0%	0.0%	0.0%	4	11.4%	3.2%	6.2%	3.3%
Moderate	13	37.1%	30.7%	38.5%	30.9%	7	20.0%	21.6%	21.2%	19.1%
Middle	22	62.9%	69.3%	61.5%	69.1%	12	34.3%	45.0%	21.6%	20.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	12	34.3%	30.1%	27.8%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	23.1%	13.0%
Total	35	100.0%	100.0%	100.0%	100.0%	35 nance	100.0%	100.0%	100.0%	100.0%
Low	0	0.0%	0.0%	0.0%	0.0%		15.4%	4.2%	7.7%	2.8%
Moderate	6	46.2%	53.2%	32.9%		2 2	15.4%	9.1%	13.2%	10.0%
	7				31.1%					
Middle		53.8%	46.8%	67.1%	68.9%	2	15.4%	5.2%	21.8%	20.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	6	46.2%	75.5%	44.0%	51.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	6.0%	13.2%	14.9%
Total	13	100.0%	100.0%	100.0%	100.0%	13 provement	100.0%	100.0%	100.0%	100.0%
Low	0	0.0%	0.0%	0.0%	0.0%	11	23.9%	35.6%	24.4%	13.8%
Moderate	13	28.3%	16.7%	42.2%	41.4%	15	32.6%	20.9%	17.8%	27.0%
Middle	33	71.7%	83.3%	57.8%	58.6%	13	28.3%	25.3%	31.1%	24.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	7	15.2%	18.2%	26.7%	34.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	46	100.0%	100.0%	100.0%	100.0%	46	100.0%	100.0%	100.0%	100.0%
Total	40	100.0%	100.0%	100.0%	Multi-		100.0%	100.0%	100.076	100.0%
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%
Total	- 0	0.070	0.070	0.070		Totals	0.070	0.070	0.070	0.070
Low	0	0.0%	0.0%	0.0%	0.0%	17	18.1%	8.3%	8.3%	3.5%
Moderate	32	34.0%	35.2%	36.4%	31.4%	24	25.5%	17.9%	17.6%	15.0%
Middle	62	66.0%	64.8%	63.6%	68.6%	27	28.7%	30.5%	22.5%	20.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	25	26.6%	41.6%	34.6%	47.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.1%	1.7%	17.0%	13.4%
Total	94	100.0%	100.0%	100.0%	100.0%	94	100.0%	100.0%	100.0%	100.0%
					SMALL B			,-		
						t Income				
			Ba	nk	•			Aggr		
		#	9/		-	000s)		%		(000s)
Low		0	0.0)%		0%		0%
Moderate	2	23	46.0	0%	55.	7%	28	.9%		.8%
Middle	2	27	54.0	0%	44.	3%	66	.1%	62	.3%
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)%	4.	9%	0.	9%
Total	5	0	100.	0%	100.	.0%	100	0.0%	100	0.0%
					By Re	venue	-			
\$1 Million or Less	4	1	82.0	0%	67.	1%	52	.6%	66	.9%
					By Loa	an Size				
\$100,000 or less	4	1 1	82.0	0%	36.	0%	93	.8%	34	.5%
\$100,001-\$250,000		6	12.0	0%	28.	9%	4.	6%	25	.4%
\$250,001-\$1 Million		3	6.0			1%		6%	40.2%	
Total		0	100.		100.			0.0%		0.0%

RSSD ID Number: 237936

2005 Aggregate Comparison Loan Distribution Table

APPENDIX B (Continued)

Assessment Area: AL Montgomery HMDA By Tract Income By Borrower Income **Income Categories** Bank Bank Aggregate Aggregate % \$(000s) % \$(000s) % \$(000s) |% \$(000s) Home Purchase 0 0.0% 0.0% 0.0% 0.0%14.9% 4.9% 3.2% 5.6% Low Moderate 3 6.4% 1.7% 2.5% 2.0% 13 27.7% 16.1% 18.2% 13.4% Middle 38 80.9% 67.5% 71.1% 64.3% 7 14.9% 15.2% 22.7% 21.0% Upper 12.8% 30.8% 26.4% 33.6% 20 42.6% 63.8% 39.0% 51.6% 6 Unknown 0 0.0% 0.0% 0.0% 0.0% 0 0.0% 0.0% 14.5% 10.7% Total 47 100.0% 100.0% 100.0% 100.0% 47 100.0% 100.0% 100.0% 100.0% Refinance Low 0 0.0% 0.0% 0.0% 0.0% 10.0% 1.9% 5.7% 3.2% Moderate 3.3% 1.3% 3.1% 23.3% 13.4% 15.4% 11.2% 1 2.6% Middle 26 86.7% 86.9% 74.1% 67.8% 10 33.3% 32.2% 21.4% 18.3% Upper 10.0% 11.8% 22.8% 29.6% 7 23.3% 38.5% 38.2% 49.5% 3 Unknown 0 0.0% 0.0%0.0% 0.0% 3 10.0% 14.1% 19.4% 17.8% 100.0% 100.0% 100.0% 100.0% 100.0% 100.0% 100.0% 30 100.0% 30 Total Home Impr vement Low 0 0.0%0.0%0.0% 0.0% 22 42.3% 22.0% 11.3% 5.5% Moderate 0.5% 9 10.9% 24.3% 1 1.9% 4.6% 5.9% 17.3% 14.7% Middle 96.2% 97.8% 78.3% 12 23.1% 45.7% 26.3% 21.5% 50 66.2%Upper 1.9% 1.7% 17.1% 27.9% 8 15.4% 20.8% 36.6% 53.1% 1 0.0% 0.0% 0 0.0% 0.0% 1.9% 0.7% 1.5% 5.2% Unknown 100.0% 100.0% 100.0% Total 52 100.0% 100.0% 100.0% 100.0% 52 100.0% Multi-Family 0.0% 0 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% Low 0 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% Moderate 0.0% 0 0.0% 0 Middle 0 0.0% 0.0% 100.0% 100.0% 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% 100.0% 100.0% Total 0.0% 0.0% 100.0% 100.0% 0.0% 0.0% 100.0% 100.0% 0 **HMDA Totals** 0.0% 5.9% Low 0 0.0% 0.0% 0.0% 32 24.8% 4.8% 3.2% Moderate 5 3.9% 1.5% 2.8% 2.3% 29 22.5% 14.5% 17.4% 12.7% Middle 114 88.4% 78.4% 72.5% 65.7% 29 22.5% 25.1% 22.4% 20.0% Upper 10 7.8% 20.1% 24.7% 32.0% 35 27.1% 49.2% 38.6% 50.8% Unknown 0 0.0% 0.0% 0.0% 0.0% 4 3.1% 6.4% 15.7% 13.3% 129 100.0% 100.0% 100.0% 100.0% Total 100.0% 129 100.0% 100.0% 100.0% SMALL BUSINESS By Tract Income Bank Aggregate % \$(000s) % \$(000s) % 0 0.0% 0.0% 0.0% 0.0% Low Moderate 5 7.0% 7.1% 6.2% 8.0% Middle 60 84.5% 75.4% 67.4% 63.4% Upper 6 8.5% 17.5% 24.1% 27.1% Unknown 0 0.0% 0.0% 0.0% 0.0% 0.0% Tract Unknown 0 0.0% 2.3% 1.5% 100.0% 100.0% Total 71 100.0% 100.0% By Revenue \$1 Million or Less 59.2% 66.7% 47.9% 58.6% By Loan Size \$100,000 or less 51 71.8% 24.6% 93.9% 39.1% \$100,001-\$250,000 10 14.1% 23.5% 3.6% 19.2% \$250,001-\$1 Million 10 14.1% 52.0% 2.5% 41.7% 71 100.0% 100 0% 100.0% 100.0%

RSSD ID Number: 237936

2005 Aggregate Comparison Loan Distribution Table

Assessment Area: AL Selma HMDA By Tract Income By Borrower Income **Income Categories** Bank Bank Aggregate Aggregate % \$(000s) % \$(000s) % \$(000s) |% \$(000s) Home Purchase 2.9% 1.3% 0.7% 0.3% 17.1% 7.3% 6.3% 4.2% Low 1 6 Moderate 9 25.7% 32.3% 17.5% 14.0% 11 31.4% 18.0% 17.9% 14.6% Middle 16 45.7% 34.1% 58.4% 60.6% 4 11.4% 10.5% 22.2% 23.6% Upper 9 25.7% 32.3% 23.3% 25.1% 12 34.3% 58.4% 25.1% 38.5% Unknown 0 0.0% 0.0% 0.0% 0.0% 5.7% 5.8% 28.4% 19.1% Total 35 100.0% 100.0% 100.0% 100.0% 35 100.0% 100.0% 100.0% 100.0% Refinance Low 1 4.5% 0.8% 7.5% 4.4% 4.5% 2.9% 6.8% 4.1% 20.6% Moderate 3 13.6% 15.9% 18.0% 31.8% 18.9% 14.3% 11.2% 7 Middle 15 68.2% 63.4% 56.1% 61.7% 4 18.2% 13.7% 22.6% 22.1% Upper 13.6% 20.0% 15.8% 15.9% 8 36.4% 53.4% 39.0% 46.5% 3 Unknown 0 0.0% 0.0%0.0% 0.0% 9.1% 11.1% 17.3% 16.1% 22 100.0% 100.0% 100.0% 100.0% 100.0% 100.0% 100.0% 100.0% Total Home Impre 7 Low 13.5% 16.3% 12.5% 6.4% 15 28.8% 15.0% 20.8% 10.8% Moderate 21.2% 7.8% 11 25.0% 13.5% 11 21.2% 14.6% 26.0% 18.7% Middle 51.9% 69.0% 52.1% 7 13.5% 7.8% 19.8% 13.7% 27 65.3% Upper 7 13.5% 6.8% 10.4% 14.9% 18 34.6% 61.9% 31.3% 54.5% 0.0% 0 0.0% 0.0% 0.0% 1.9% 0.7% 2.2% Unknown 2.1% 52 100.0% 100.0% 100.0% Total 100.0% 100.0% 100.0% 100.0% 52 100.0% Multi-Family 0.0% 0 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% Low 0 0.0% 50.0% 57.9% 0.0% 0.0% 0.0% Moderate 0.0% 0 0.0% 0 Middle 0 0.0% 0.0% 50.0% 42.1% 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% 100.0% 100.0% 0.0% 0.0% 100.0% 100.0% 0 **HMDA Totals** 20.2% Low 9 8.3% 2.1% 4.5% 2.4% 22 6.0% 7.8% 4.4% Moderate 23 21.1% 23.6% 19.5% 15.8% 29 26.6% 18.1% 17.1% 13.2% Middle 58 53.2% 49.1% 56.9% 61.2% 15 13.8% 11.7% 22.1% 22.5% Upper 19 17.4% 25.2% 19.1% 20.6% 38 34.9% 56.5% 31.3% 42.5% Unknown 0 0.0% 0.0% 0.0% 0.0% 5 4.6% 7.7% 21.7% 17.4% 109 100.0% 100.0% 100.0% 100.0% 100.0% Total 100.0% 109 100.0% 100.0% SMALL BUSINESS By Tract Income Bank Aggregate % \$(000s) % \$(000s) % 15 30.0% 52.0% 12.5% 7.0% Low Moderate 10 20.0% 13.7% 30.4% 22.4% Middle 17 34.0% 22.5% 45.6% 55.4% Upper 8 16.0% 11.7% 9.4% 13.8% Unknown 0 0.0% 0.0% 0.0% 0.0% Tract Unknown 0 0.0% 0.0% 2.0% 1.5% 100.0% 100.0% Total 50 100.0% 100.0% By Revenue \$1 Million or Less 38 76.0% 64.2% 51.7% 58.2% By Loan Size \$100,000 or less 35 70.0% 24.5% 93.3% 41.6% \$100,001-\$250,000 10 20.0% 27.5% 3.9% 17.8% \$250,001-\$1 Million 10.0% 48.0% 2.9% 40.5% 50 100.0% 100.0% 100 0% 100.0%

RSSD ID Number: 237936

2005 Aggregate Comparison Loan Distribution Table Assessment Area: AL Tuscaloosa

			TISSESSITION	t mca. n	L Tuscalo					
		D,	y Tract Inco	mo	HM	DA I	R _v I	Borrower In	oomo	
Income Categories		Bank	y 11act flicol		regate		Bank	oorrower in		egate
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
		ı			Home P	urchase	1		1	ı
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.1%	2.9%
Moderate	1	16.7%	6.5%	11.5%	8.3%	0	0.0%	0.0%	17.5%	14.0%
Middle	3	50.0%	54.1%	54.0%	49.7%	1	16.7%	13.8%	22.1%	19.9%
Upper	2	33.3%	39.4%	34.5%	41.9%	5	83.3%	86.2%	41.1%	51.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.1%	11.7%
Total	6	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%
		1	1			nance	1		l	1
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.2%	2.6%
Moderate	0	0.0%	0.0%	14.6%	8.9%	0	0.0%	0.0%	15.1%	10.2%
Middle	1	33.3%	18.7%	52.7%	49.7%	0	0.0%	0.0%	20.7%	17.4%
Upper	2	66.7%	81.3%	32.6%	41.4%	3	100.0%	100.0%	40.5%	52.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.5%	16.9%
Total	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
		ı			1 1	provement	I.		İ	1
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.5%	6.8%
Moderate	1	33.3%	3.8%	23.7%	19.8%	1	33.3%	3.8%	19.8%	13.1%
Middle	2	66.7%	96.2%	48.5%	49.9%	0	0.0%	0.0%	21.9%	15.2%
Upper	0	0.0%	0.0%	27.8%	30.3%	2	66.7%	96.2%	43.7%	55.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	9.3%
Total	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
		1			Multi-		1			
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%	42.9%	36.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	42.9%	44.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	14.3%	19.1%	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%
		ı				Totals	1		1	
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	2.7%
Moderate	2	16.7%	3.1%	13.1%	9.5%	1	8.3%	0.1%	16.6%	12.2%
Middle	6	50.0%	36.5%	53.3%	49.6%	1	8.3%	6.4%	21.6%	18.3%
Upper	4	33.3%	60.4%	33.5%	40.9%	10	83.3%	93.5%	40.9%	50.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.1%	16.1%
Total	12	100.0%	100.0%	100.0%	100.0%	12	100.0%	100.0%	100.0%	100.0%
					SMALL B	USINESS				
					By Trac	t Income	_			
		,,	Ba		1 0/0/		,		egate	.000
		#	9/			000s)		%		000s)
Low		0	0.0)%		9%		2%
Moderate		6	23.			9%		.2%		.4%
Middle		4	53.8			7%		.2%		.5%
Upper		6	23.			4%		.9%		.1%
Unknown		0	0.0	1%)%	0.	0%	0.0	0%
Tract Unknown		0	0.0	1%	0.0)%	3.	8%	0.3	8%
Total	2	6	100.	0%	100.	.0%	100	0.0%	100	.0%
					By Re	venue				
\$1 Million or Less	1	8	69.2	2%	76.	0%	47	.2%	57.	.7%
					By Loa	an Size	_			
\$100,000 or less	1	4	53.8	8%	13.	1%	88	.1%	29.	.1%
\$100,001-\$250,000		8	30.8					9%		2%
\$250,001-\$1 Million		4	15.4		35.9% 51.0%		5.0%		48.7%	
Total		6	100.		100			0.0%		0.0%
1 Oral		·	100.	U/U	100.	0/0	100	.0/0	100	.0/0

APPENDIX C

RSSD ID Number: 237936

Assessment Area Demographics

Assessment Area: AL Auburn

Income Categories	Tract Distribut		Families I ion Tract Inco			Families < P Level as ⁹ Families by	% of	Families Family Inc	
	#	%		#	%	#	%	#	%
Low-income	3	14.3		1,003	3.6	400	39.9	6,248	22.6
Moderate-income	4	19.0		3,396	12.3	843	24.8	4,470	16.2
Middle-income	10	47.6		18,168	65.8	1,657	9.1	5,998	21.7
Upper-income	4	19.0		5,046	18.3	173	3.4	10,897	39.5
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0
Total Assessment Area	21	100.0		27,613	100.0	3,073	11.1	27,613	100.0
	Housing Units by				Housi	ng Types by T	ract		
	Tract	Owner-Occupied			d	Rental		Vacant	
			#	%	%	#	%	#	%
Low-income	4,045		472	1.7	11.7	3,108	76.8	465	11.5
Moderate-income	8,059		4,330	15.3	53.7	2,715	33.7	1,014	12.6
Middle-income	30,486	1	8,020	63.5	59.1	9,710	31.9	2,756	9.0
Upper-income	7,739		5,554	19.6	71.8	1,793	23.2	392	5.1
Unknown-income	0		0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	50,329	2	8,376	100.0	56.4	17,326	34.4	4,627	9.2
	Total Busine Tract				Businesses by Tract & Revenu			e Size	
			L	ess Than \$1 Millio	-	Over \$1 Million		Revenue l Reporte	
	#	%		#	%	#	%	#	%
Low-income	327	8.9		278	8.6	26	9.3	23	15.4
Moderate-income	365	10.0		326	10.1	29	10.4	10	6.7
Middle-income	2,428	66.2		2,156	66.5	184	65.9	88	59.1
Upper-income	548	14.9		480	14.8	40	14.3	28	18.8
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0
Total Assessment Area	3,668	100.0		3,240	100.0	279	100.0	149	100.0
	Percentage of	Total B	usiness	ses:	88.3		7.6		4.1

RSSD ID Number: 237936

Loan Distribution Table

Assessment Area: AL Auburn

	1	ASSC	SSIIICHT ATC	a: AL Aubi	IDA			
Income Categories		Ry Trac	t Income	III.	IDA I	By Rorroy	ver Income	
Income categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		,,,	\$(0000)		Purchase	, ,	Φ(0003)	, ,
Low	0	0.0%	0	0.0%	34	20.4%	874	13.7%
Moderate	72	43.1%	2,301	36.1%	40	24.0%	1,342	21.1%
Middle	88	52.7%	3,474	54.5%	34	20.4%	1,458	22.9%
Upper	7	4.2%	597	9.4%	51	30.5%	2,622	41.1%
Unknown	0	0.0%	0	0.0%	8	4.8%	76	1.2%
Total	167	100.0%	6,372	100.0%	167	100.0%	6,372	100.0%
		•			nance	•		
Low	1	8.3%	120	10.9%	1	8.3%	8	0.7%
Moderate	2	16.7%	44	4.0%	3	25.0%	110	10.0%
Middle	8	66.7%	786	71.6%	3	25.0%	304	27.7%
Upper	1	8.3%	148	13.5%	4	33.3%	477	43.4%
Unknown	0	0.0%	0	0.0%	1	8.3%	199	18.1%
Total	12	100.0%	1,098	100.0%	12	100.0%	1,098	100.0%
		•		Home Im	provement		•	
Low	0	0.0%	0	0.0%	1	16.7%	4	4.6%
Moderate	1	16.7%	50	57.5%	1	16.7%	22	25.3%
Middle	4	66.7%	32	36.8%	2	33.3%	6	6.9%
Upper	1	16.7%	5	5.7%	2	33.3%	55	63.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	87	100.0%	6	100.0%	87	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	1	50.0%	693	4.2%	0	0.0%	0	0.0%
Upper	1	50.0%	15,759	95.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	16,452	100.0%
Total	2	100.0%	16,452	100.0%	2	100.0%	16,452	100.0%
		_		HMDA	Totals	_	_	_
Low	1	0.5%	120	0.5%	36	19.3%	886	3.7%
Moderate	75	40.1%	2,395	10.0%	44	23.5%	1,474	6.1%
Middle	101	54.0%	4,985	20.8%	39	20.9%	1,768	7.4%
Upper	10	5.3%	16,509	68.8%	57	30.5%	3,154	13.1%
Unknown	0	0.0%	0	0.0%	11	5.9%	16,727	69.7%
Total	187	100.0%	24,009	100.0%	187	100.0%	24,009	100.0%
			_		BUSINESS		_	
		#	9,	% D T		00s)	,	%
Low		12		•	t Income	400	I 12	50/
Moderate		12		9% .9%		488 06		.5%
Middle		18 94		.3%		865		8% .8%
		9 4 27		.9%				
Upper Unknown		0		.9% 0%		425 0		.9% 0%
Total		51		1.0%		484		0.0%
Total		31	100		evenue	404	100	.070
\$1 Million or Less	1 ,	18	78	.1%	•	484	56	7%
Over \$1 Million		118 31		.5%		550	56.7% 40.8%	
Not Known		2		3%	· · · · · · · · · · · · · · · · · · ·	50		.070 4%
Total		51		1.0%		484		0.0%
			100		an Size	.01	100	.0/0
\$100,000 or less	1	08	71	.5%		975	21	.5%
\$100,001 - \$250,000		23		2%		357		.6%
\$250,001 - \$1 Million		20		2%		152		
Total		51		.0%		484	54.9% 100.0%	
	1	~ .	100	.0/0	10,		100	.0/0

RSSD ID Number: 237936

Assessment Area Demographics

Assessment Area: AL Birmingham

Income Categories	Tract Distribut		Families to Tract Incom			Families < P Level as ⁹ Families by	% of	Families Family Inc	•
	#	%		#	%	#	%	#	%
Low-income	0	0.0		0	0.0	0	0.0	6,144	13.2
Moderate-income	3	8.6		5,176	11.2	870	16.8	6,027	13.0
Middle-income	9	25.7		12,305	26.5	1,179	9.6	8,689	18.7
Upper-income	23	65.7		28,912	62.3	675	2.3	25,533	55.0
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0
Total Assessment Area	35	100.0		46,393	100.0	2,724	5.9	46,393	100.0
	Housing Units by				Housi	ng Types by T	ract		
	Tract	Owner-Occupied			d Rental			Vacant	
			#	%	%	#	%	#	%
Low-income	0		0	0.0	0.0	0	0.0	0	0.0
Moderate-income	7,992		5,468	10.9	68.4	1,717	21.5	807	10.1
Middle-income	18,759	1	3,192	26.3	70.3	3,134	16.7	2,433	13.0
Upper-income	40,896	3	1,511	62.8	77.1	7,030	17.2	2,355	5.8
Unknown-income	0		0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	67,647	5	0,171	100.0	74.2	11,881	17.6	5,595	8.3
	Total Busine Tract				Businesses by Tract & Revenu			e Size	
			L	ess Than \$1 Millio	-	Over \$1 Million		Revenue Reporte	
	#	%		#	%	#	%	#	%
Low-income	0	0.0		0	0.0	0	0.0	0	0.0
Moderate-income	445	6.5		392	6.6	30	4.1	23	9.1
Middle-income	1,533	22.3		1,344	22.8	125	17.0	64	25.4
Upper-income	4,907	71.3		4,163	70.6	579	78.9	165	65.5
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0
Total Assessment Area	6,885	100.0		5,899	100.0	734	100.0	252	100.0
	Percentage of	Total B	usiness	ses:	85.7		10.7		3.7

RSSD ID Number: 237936

Loan Distribution Table

Assessment Area: AL Birmingham

		Assess	ment Area:						
Incomo Cotoconico		Dy Troo	et Income	HM	IDA I	Dr. Donner	ver Income		
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	
	77	70	\$(0003)		urchase	/0	\$(0003)	/0	
Low	0	0.0%	0	0.0%	4	11.4%	276	7.9%	
Moderate	12	34.3%	889	25.6%	7	20.0%	255	7.3%	
Middle	15	42.9%	1,022	29.4%	9	25.7%	995	28.6%	
Upper	8	22.9%	1,562	45.0%	15	42.9%	1,947	56.1%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	35	100.0%	3,473	100.0%	35	100.0%	3,473	100.0%	
			2,1,2		nance		-,.,-		
Low	0	0.0%	0	0.0%	3	15.8%	125	7.2%	
Moderate	9	47.4%	781	44.9%	2	10.5%	213	12.2%	
Middle	5	26.3%	499	28.7%	5	26.3%	358	20.6%	
Upper	5	26.3%	460	26.4%	9	47.4%	1,044	60.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	19	100.0%	1,740	100.0%	19	100.0%	1,740	100.0%	
		•	•		provement	•		•	
Low	0	0.0%	0	0.0%	13	30.2%	36	7.8%	
Moderate	18	41.9%	108	23.5%	14	32.6%	120	26.1%	
Middle	19	44.2%	131	28.5%	12	27.9%	252	54.9%	
Upper	5	11.6%	215	46.8%	4	9.3%	51	11.1%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	43	100.0%	459	100.0%	43	100.0%	459	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%	20	20.6%	437	7.7%	
Moderate	39	40.2%	1,778	31.3%	23	23.7%	588	10.4%	
Middle	39	40.2%	1,652	29.1%	26	26.8%	1,605	28.3%	
Upper	18	18.6%	2,237	39.4%	28	28.9%	3,042	53.6%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	97	100.0%	5,672	100.0%	97	100.0%	5,672	100.0%	
		,,			BUSINESS			.,	
		#		% D T		00s)	•	%	
Low		0	1 0	By Irac 0%	t Income	0	I 0.	00/	
Moderate								0%	
Middle		46 48		.3% .0%		559 073		.3% .1%	
Upper		23		.7%				.6%	
Unknown		0		. 776 0%		452 0			
Total		17		1.0%		084	0.0% 100.0%		
Total		17	100		evenue	004	100	.070	
\$1 Million or Less		93	I 79	.5%	•	370	50	.4%	
Over \$1 Million		93 23		.7%		704		.5%	
Not Known	1	23		9%					
Total	1 117			.0%	10 14,084		0.1% 100.0%		
	117		100		an Size		100.070		
\$100,000 or less		83	70	.9%	•	397	24	.1%	
\$100,001 - \$250,000		19		2%		114		.1%	
\$250,001 - \$1 Million		15		.8%			53.8%		
Total		17		.0%	7,573 14,084		53.8% 100.0%		

RSSD ID Number: 237936

Assessment Area Demographics

Assessment Area: AL Greenville

Income Categories	Tract Distribut		Families I ion Tract Inco			Families < P Level as % Families by	% of	Families by Family Income	
	#	%		#	%	#	%	#	%
Low-income	0	0.0		0	0.0	0	0.0	1,705	28.9
Moderate-income	4	44.4		2,645	44.9	707	26.7	1,101	18.7
Middle-income	5	55.6		3,249	55.1	495	15.2	1,202	20.4
Upper-income	0	0.0		0	0.0	0	0.0	1,886	32.0
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0
Total Assessment Area	9	100.0		5,894	100.0	1,202	20.4	5,894	100.0
	Housing Units by				Housi	ng Types by Ti	ract		
	Tract	Owner-Occupied			d Rental			Vacant	
			#	%	%	#	%	#	%
Low-income	0		0	0.0	0.0	0	0.0	0	0.0
Moderate-income	4,541		2,754	43.0	60.6	982	21.6	805	17.7
Middle-income	5,416		3,644	57.0	67.3	1,018	18.8	754	13.9
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	9,957		6,398	100.0	64.3	2,000	20.1	1,559	15.7
	Total Busine Tract				Businesses by Tract & Revenu			e Size	
			L	ess Than \$1 Millio	-	Over \$1 Million		Revenue Reporte	
	#	%		#	%	#	%	#	%
Low-income	0	0.0		0	0.0	0	0.0	0	0.0
Moderate-income	209	34.6		178	33.6	17	43.6	14	40.0
Middle-income	395	65.4		352	66.4	22	56.4	21	60.0
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	604	100.0		530	100.0	39	100.0	35	100.0
	Percentage of	Total B	usiness	ses:	87.7		6.5	<u> </u>	5.8

RSSD ID Number: 237936

APPENDIX C (Continued)

Loan Distribution Table

Assessment Area: AL Greenville

		Asses	sment Area						
Incomo Cotogonico		Dy Tuo	t Income	HM	IDA I	Dy Donnor	ver Income		
Income Categories	#	%	\$(000s)	%	#	% %	\$(000s)	%	
	#	/0	\$(0008)		urchase	/0	\$(0008)	/0	
Low	0	0.0%	0	0.0%	6	12.5%	90	4.5%	
Moderate	17	35.4%	634	31.6%	8	16.7%	359	17.9%	
Middle	31	64.6%	1,374	68.4%	15	31.3%	790	39.3%	
Upper	0	0.0%	0	0.0%	19	39.6%	769	38.3%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	48	100.0%	2,008	100.0%	48	100.0%	2,008	100.0%	
Total	70	100.070	2,008		nance	100.078	2,000	100.070	
Low	0	0.0%	0	0.0%	4	14.3%	73	4.5%	
Moderate	10	35.7%	605	37.6%	6	21.4%	235	14.6%	
Middle	18	64.3%	1,002	62.4%	6	21.4%	187	11.6%	
Upper	0	0.0%	0	0.0%	10	35.7%	1,025	63.8%	
Unknown	0	0.0%	0	0.0%	2	7.1%	87	5.4%	
Total	28	100.0%	1,607	100.0%	28	100.0%	1,607	100.0%	
Total	20	100.070	1,007		provement	100.070	1,007	100.070	
Low	0	0.0%	0	0.0%	15	16.5%	238	22.6%	
Moderate	34	37.4%	420	39.9%	32	35.2%	152	14.4%	
Middle	57	62.6%	632	60.1%	18	19.8%	127	12.1%	
Upper	0	0.0%	0	0.0%	26	28.6%	535	50.9%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	91	100.0%	1,052	100.0%	91	100.0%	1,052	100.0%	
Total	71	100.070	1,032		Family	100.070	1,032	100.070	
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%	
					Totals		-		
Low	0	0.0%	0	0.0%	25	15.0%	401	8.6%	
Moderate	61	36.5%	1,659	35.5%	46	27.5%	746	16.0%	
Middle	106	63.5%	3,008	64.5%	39	23.4%	1,104	23.7%	
Upper	0	0.0%	0	0.0%	55	32.9%	2,329	49.9%	
Unknown	0	0.0%	0	0.0%	2	1.2%	87	1.9%	
Total	167	100.0%	4,667	100.0%	167	100.0%	4,667	100.0%	
				SMALL I	BUSINESS			•	
		#	Q	%		00s)	•	2%	
				•	t Income		1		
Low		0		0%		0		0%	
Moderate		39		.9%		590		.0%	
Middle		52		.1%		298		.0%	
Upper		0	0.0	0%	·	0	0.	0%	
Unknown		0		0%		0	0.	0%	
Total	91		100	0.0%		388	100	0.0%	
©1 Million on I		60	I		evenue		l	00/	
\$1 Million or Less	69			.8%		377		.8%	
Over \$1 Million	22			.2%		011		.2%	
Not Known	0			0%		0		0%	
Total	-	91	100	0.0% Pv I o	5,8 an Size	388	100	0.0%	
\$100,000 or less		77	0.4			700	1.5	Ω0/2	
\$100,000 of fess \$100,001 - \$250,000		77 10		.6%		700		.9%	
\$250,001 - \$230,000 \$250,001 - \$1 Million		4		.0%		559		.2%	
Total		91		4% 0.0%		529	26.0%		
Originations and Burchases		71	100	.070	3,0	388	100.0%		

RSSD ID Number: 237936

Assessment Area Demographics

Assessment Area: AL Tuscaloosa

Income Categories	Tract Distribut		Families to Tract Incom			Families < P Level as ⁹ Families by	% of	of Family Inco	
	#	%		#	%	#	%	#	%
Low-income	1	2.2		139	0.3	68	48.9	8,393	19.9
Moderate-income	12	26.7		10,189	24.2	2,184	21.4	7,046	16.7
Middle-income	21	46.7		21,682	51.5	2,075	9.6	8,434	20.0
Upper-income	11	24.4		10,097	24.0	413	4.1	18,234	43.3
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0
Total Assessment Area	45	100.0		42,107	100.0	4,740	11.3	42,107	100.0
	Housing Units by			Housi	ng Types by T	ract			
	Tract	Owner-Occupied		i	Rental		Vacant		
			#	%	%	#	%	#	%
Low-income	666		26	0.1	3.9	601	90.2	39	5.9
Moderate-income	20,478		7,795	19.0	38.1	10,454	51.0	2,229	10.9
Middle-income	35,167	2	2,156	54.1	63.0	9,588	27.3	3,423	9.7
Upper-income	15,118	1	0,981	26.8	72.6	2,916	19.3	1,221	8.1
Unknown-income	0		0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	71,429	4	0,958	100.0	57.3	23,559	33.0	6,912	9.7
	Total Busine Tract	-			Businesses by Tract & Revenu			e Size	
			L	ess Than \$1 Millio		Over \$1 Million		Revenue Reporte	
	#	%		#	%	#	%	#	%
Low-income	118	2.0		95	1.9	19	3.7	4	2.1
Moderate-income	2,123	36.6		1,853	36.3	210	40.9	60	31.9
Middle-income	2,261	39.0		1,994	39.1	179	34.9	88	46.8
Upper-income	1,297	22.4		1,156	22.7	105	20.5	36	19.1
Unknown-income	0	0.0		0	0.0	0	0.0	0	0.0
Total Assessment Area	5,799	100.0		5,098	100.0	513	100.0	188	100.0
	Percentage of	Total B	usiness	ses:	87.9		8.8	_	3.2

RSSD ID Number: 237936

Loan Distribution Table

Assessment Area: AL Tuscaloosa

	1	Assess	silient Area	: AL Tuscal	IDA			
Income Categories		Ry Trac	t Income	HIV	IDA I	Ry Rorroy	ver Income	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		70	Φ(0000)		urchase	,,	Φ(0005)	,,,
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	25.0%	126	14.3%	1	8.3%	11	1.2%
Middle	6	50.0%	436	49.3%	2	16.7%	118	13.3%
Upper	3	25.0%	322	36.4%	9	75.0%	755	85.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	884	100.0%	12	100.0%	884	100.0%
		•			nance			
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	14.3%	125	7.4%	0	0.0%	0	0.0%
Middle	3	42.9%	424	25.1%	0	0.0%	0	0.0%
Upper	3	42.9%	1,141	67.5%	6	85.7%	1,565	92.6%
Unknown	0	0.0%	0	0.0%	1	14.3%	125	7.4%
Total	7	100.0%	1,690	100.0%	7	100.0%	1,690	100.0%
			•	Home Im	provement		•	•
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	1	0.4%	1	25.0%	1	0.4%
Middle	3	75.0%	235	99.6%	1	25.0%	210	89.0%
Upper	0	0.0%	0	0.0%	2	50.0%	25	10.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	236	100.0%	4	100.0%	236	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%	0	0.0%	0	0.0%
Moderate	5	21.7%	252	9.0%	2	8.7%	12	0.4%
Middle	12	52.2%	1,095	39.0%	3	13.0%	328	11.7%
Upper	6	26.1%	1,463	52.1%	17	73.9%	2,345	83.5%
Unknown	0	0.0%	0	0.0%	1	4.3%	125	4.4%
Total	23	100.0%	2,810	100.0%	23	100.0%	2,810	100.0%
					BUSINESS			
		#		% Ry Trac	t Income	00s)	•	2%
Low		1	1.	6%	•	51	2	3%
Moderate		20		.3%		154		.6%
Middle		31		4%		359		.3%
Upper		12		.8%		378		.7%
Unknown		0		0%		0		0%
Total	(54	100	.0%	6,5	42	100	0.0%
					evenue			
\$1 Million or Less		50	78.	.1%	•	254	80	.3%
Over \$1 Million		14		.9%		288		.7%
Not Known		0	0.0	0%		0	0.	0%
Total		54	100	.0%	6,5	342	100	0.0%
				By Lo	an Size			
\$100,000 or less		45	70.	.3%	1,9	998	30	.5%
\$100,001 - \$250,000		14	21.	.9%	2,2	253	34	.4%
\$250,001 - \$1 Million		5	7.	8%	2,2	291	35.0%	
Total	(54	100	.0%	6,542		100.0%	

APPENDIX D - GENERAL INFORMATION

RSSD ID Number: 237936

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 The Peoples Bank and Trust Company prepared by the <u>Federal Reserve Bank of Atlanta</u>, the institution's supervisory agency, as of July 16, 2007. 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 Appendix A to 12 CFR Part 228.

ABBREVIATIONS

ATMs	
CRA	
FDIC	Federal Deposit Insurance Corporation
FHA	Federal Housing Administration
HMDA	
HUD	Department of Housing and Urban Development
LTD	Loan-to-Deposit Ratio
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS	Regional Economic Information Systems
SBA	Small Business Administration
USDA	United States Department of Agriculture

ROUNDING CONVENTION

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

APPENDIX E - GLOSSARY

RSSD ID Number: 237936

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 multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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.

Distressed Nonmetropolitan Middle-Income Geography: Geographies located in counties that meet one or more triggers that generally reflect the "distress criteria" used by the Community Development Financial Institutions (CDFI) Fund. The distress triggers are: (1) an unemployment rate of at least 1.5 times the national average; (2) a poverty rate of 20 percent or more; (3) a population loss of 10 percent or more between the previous and most recent decennial census, or a net migration loss of 5 percent or more over the five-year period preceding the most recent census.

APPENDIX E – GLOSSARY (Continued)

RSSD ID Number: 237936

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).

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 multifamily (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 a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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.

APPENDIX E – GLOSSARY (Continued)

RSSD ID Number: 237936

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or 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.