

PUBLIC DISCLOSURE

January 14, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Citizens Trust Bank
75 Piedmont Avenue
Atlanta, Georgia 30303**

RSSD ID Number: 680130

**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’S CRA RATING

INSTITUTION’S CRA RATING: This institution is rated Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

The following table indicates the performance level of Citizens Trust Bank with respect to the lending and community development tests.

PERFORMANCE LEVELS	<u>Citizens Trust Bank</u>	
	PERFORMANCE TESTS	
	Lending Test	Community Development Test
Outstanding	X	X
Satisfactory		
Needs to Improve		
Substantial Noncompliance		

**Note: The lending test and the community development test are weighted equally when arriving at an overall rating.

Major factors supporting the institution’s rating include:

- The bank’s loan-to-deposit ratio was reasonable.
- A majority of loans were originated inside its assessment areas.
- The geographic distribution of loans reflects excellent dispersion throughout the assessment areas.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- The level of community development loans, investments, and services reflects excellent responsiveness to community development needs in its assessment area, considering the institution’s capacity and the need and availability of such opportunities for community development in the institution’s assessment areas.

INSTITUTION

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, as well as the economic and demographic characteristics of its defined assessment area. Citizens Trust Bank's CRA performance evaluation was based on CRA activities within its assessment areas using the Interagency Intermediate Small Institution Examination Procedures. At the time of this evaluation, intermediate small banks are banks with assets of at least \$296 million as of December 31 of both of the prior two calendar years, and less than \$1.186 billion as of December 31 of either of the prior two calendar years. Under these procedures, effective as of September 1, 2005, institutions meeting the threshold size are evaluated using two separately rated tests: a lending test, and a community development test that includes an evaluation of community development loans, investments, and services in light of community needs within its assessment areas and the capacity of the bank.

Full scope reviews were conducted on two of the bank's four assessment areas – Atlanta, Georgia and Birmingham, Alabama. The Columbus, Georgia-Alabama and Tuscaloosa, Alabama, assessment areas were reviewed using limited-scope procedures. When determining the overall rating, the greatest weight was placed on the bank's performance in the Atlanta assessment area, and subsequently the state of Georgia, because a higher percentage of the bank's deposits, banking offices, and loans are in this assessment area. The lending test included an analysis of Home Mortgage Disclosure Act (HMDA) loans, a sample of commercial loans, and a sample of consumer loans originated from January 1, 2010, through December 31, 2011. For the purposes of CRA, HMDA loans are those loans defined in Regulation C. The HMDA loan categories are home purchase, home refinance, home improvement, and multi-family loans. Consumer loans for this examination are defined as loans to one or more individuals for household, family, or other personal expenditures, including motor vehicle loans and other secured and unsecured loans.

For the community development test, the examination covered community development loans, qualified investments, and community development services from January 25, 2011, to January 14, 2013. The CRA defines a community development activity as having a primary purpose of providing any of the following: affordable housing or community services for low- or moderate-income persons, economic development through the financing of small businesses, revitalizing or stabilizing low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies that benefit the assessment area or a larger statewide or regional area that includes the assessment area.

As part of this evaluation, information from two community contacts was considered. The community contacts are individuals who are familiar with the economic and demographic characteristics as well as community development opportunities in the bank's full scope assessment areas. Information obtained from these contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the applicable section of the evaluation for each assessment area.

DESCRIPTION OF INSTITUTION

Citizens Trust Bank is a community bank headquartered in Atlanta, Georgia. The bank is a wholly owned subsidiary of Citizens Bancshares Corporation, also headquartered in Atlanta, Georgia. Citizens Trust Bank maintains a website at www.ctbconnect.com. The bank offers various business and consumer banking products, including money market accounts, checking accounts, savings accounts, and certificates of deposit. The bank also offers online banking with a bill payment option. The bank's primary market is Atlanta, but also has a location in each of the following areas: Columbus, Georgia; Birmingham, Alabama; and Tuscaloosa, Alabama. For purposes of the CRA, Citizens Trust Bank has defined four assessment areas, which are listed below.

Georgia

- Atlanta assessment area – includes Fulton, DeKalb, Gwinnett, Henry, Fayette, Rockdale, and Clayton Counties, and is part of the Atlanta-Sandy Springs-Marietta, Georgia MSA
- Columbus assessment area – includes Muscogee County, Georgia and Russell County, Alabama and is part of the Columbus, Georgia-Alabama (multi-state) MSA

Alabama

- Birmingham assessment area – includes Jefferson and Shelby Counties and is part of the Birmingham-Hoover, Alabama MSA
- Tuscaloosa assessment area – includes Greene and Hale Counties and is part of the Tuscaloosa, Alabama MSA

The bank did not open or close any branches since the previous examination. Citizens Trust Bank currently operates 11 full-service branch offices and 19 ATMs (12 branch-based and 7 stand-alone) in Georgia and Alabama; 8 of the 11 full-service branch offices are located in the Atlanta assessment area, while one branch is located in each of the bank's other three assessment areas: Columbus, Birmingham, and Tuscaloosa.

On September 16, 2010, the bank received certification as a Community Development Financial Institution (CDFI) from the CDFI Fund. A certified CDFI is a specialized financial institution that works in market niches that are underserved by traditional financial institutions. CDFIs provide a unique range of financial products and services in economically distressed target markets, such as mortgage financing for low-income and first-time homebuyers and not-for-profit developers; flexible underwriting and risk capital for needed community facilities; and technical assistance, commercial loans, and investments to small start-up or expanding businesses in low-income areas.

In addition, the bank applied for funds through the Bank Enterprise Award Program (BEA Program) in 2010, 2011 and 2012, which is reviewed and approved by the CDFI Fund. The BEA Program provides formula-based grants to applicants for increasing qualified activities from a baseline period to an assessment period and awards are based on activities within three categories: CDFI related activities; distressed community financing activities; and service activities. The BEA Program also supports financial institutions around the country that are dedicated to financing and supporting community and economic development activities. Furthermore, the BEA Program also complements the community development activities of insured depository institutions by providing financial incentives to expand investments in CDFIs and to increase lending, investment, and service activities within economically distressed communities. Providing monetary awards for increasing community development activities leverages the CDFI Fund's dollars and puts more capital to work in distressed communities throughout the nation. The CDFI Fund website reflects that the bank was awarded funds in 2010, 2011 and 2012, ranging from \$415,000 to \$600,000, through the BEA Program; these funds were used for affordable housing projects and small business development in distressed communities in Georgia and Alabama.

The bank's decision to apply for the CDFI certification and the BEA Program demonstrates a concerted effort and dedication to respond to community development and credit needs of low- and moderate-income geographies and individuals, and small businesses in the bank's assessment areas.

Loan Portfolio

According to the September 30, 2012, Consolidated Reports of Condition and Income (Call Report), the bank's total assets decreased 1.1 percent since the previous CRA evaluation from \$396.5 million as of September 30, 2010, to \$392.3 million as of September 30, 2012. Additionally, total loans decreased 2.8 percent from \$198.8 million as of September 30, 2010, to \$193.2 million on September 30, 2012. During this same time period, total deposits decreased 1.8 percent from \$344.3 million to \$338.1 million.

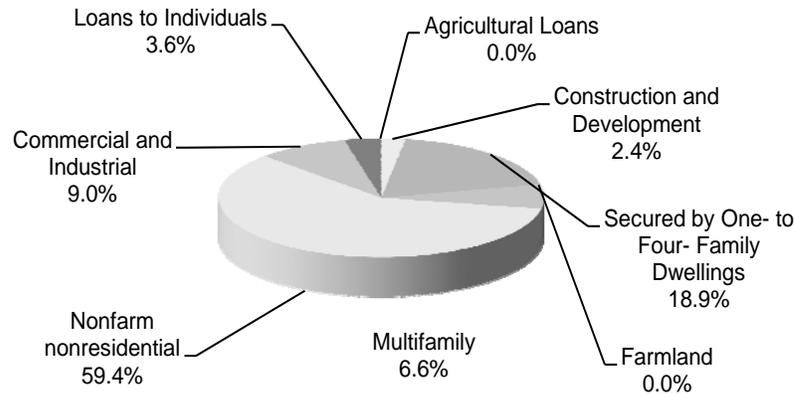
The following table and graphs show the composition of the loan portfolio according to the Consolidated Reports of Condition and Income.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2012		12/31/2011		12/31/2010	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	4,513	2.4%	5,377	2.8%	13,248	6.8%
Secured by One- to Four- Family Dwellings	35,419	18.9%	37,538	19.4%	39,536	20.3%
Other Real Estate: Farmland	0	0.0%	0	0.0%	0	0.0%
Multifamily	12,437	6.6%	8,878	4.6%	6,408	3.3%
Nonfarm nonresidential	111,104	59.4%	118,095	61.2%	110,614	56.9%
Commercial and Industrial	16,876	9.0%	16,098	8.3%	16,986	8.7%
Loans to Individuals	6,807	3.6%	7,061	3.7%	7,538	3.9%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
Total	\$187,156	100.00%	\$193,047	100.00%	\$194,330	100.00%

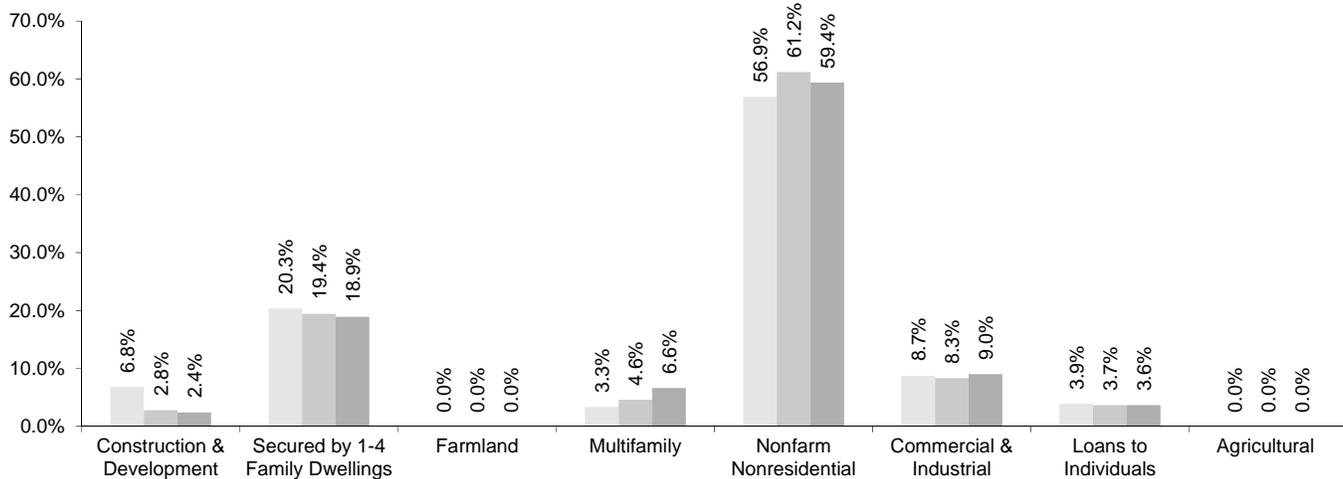
* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included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

As illustrated in the chart and tables below, the bank's loan portfolio consisted primarily of nonfarm nonresidential loans (59.4 percent), followed by real estate loans secured by one-to-four family dwellings (18.9 percent). Given that total loans have declined, the largest decline is reflected in construction and development loans, which is a result of weakened economic conditions, particularly in the areas of real estate and construction in the bank's assessment areas.

**Loan Portfolio
as of
9/30/2012**



Loan Portfolio Trend



Credit Products

Citizens Trust Bank offers various consumer and business credit products to meet the credit needs of its assessment areas. The credit products include residential mortgage loans, construction loans, consumer purpose secured and unsecured loans, consumer lines of credit, home equity lines of credit, credit cards, construction and development loans, commercial real estate loans, commercial lines of credit, and business loans.

Based on discussions with bank staff and community leaders in the Eutaw, Alabama, area on December 14, 2010, regarding credit needs for low- and moderate-income residents, management decided to reinstate the Community Relief Fund loan product in 2011. The purpose of the loan is to offer a product to borrowers in immediate need of funds in the Eutaw, Alabama, area as an alternative to pay-day lending options. Community Relief Fund loans are included in the consumer loan sample for the review period. In addition, Citizens Trust Bank¹ is recognized as the lender of choice and partners with U.S. Housing and Urban Development (HUD), DeKalb County, and the DeKalb Realtors Association with the funding of One DeKalb Lives program, which is designed to encourage home ownership and reduce the high volume of foreclosures in Decatur, Lithonia, Stone Mountain and Ellenwood (all in the state of Georgia). The comprehensive affordable housing program, featuring the Good Neighbor Next Door initiative, offers a 50 percent mortgage discount to teachers and first responders like police officers, firefighters, and emergency medical technicians. By design, the program promotes homeownership and ensures the acquisition of as many FHA foreclosures as possible in some of DeKalb County's most attractive neighborhoods.

In addition, the bank decided to start offering the Choice Debit Card product, which is a cash-only debit card account that offers options including online banking, bill payments, ATM services, and money transfers. The purpose of the product is to help unbanked or underbanked households establish credible banking relationships and to offer an alternative option to high check cashing fees; this corresponds to the FDIC's initiative to expand economic inclusion², a term used to describe a variety of public and private efforts aimed at bringing underserved consumers into the financial mainstream.

Based on products, programs and the services noted above in the credit products section, the bank demonstrates a strong commitment to meet the needs of low- and moderate-income individuals, geographies, and small businesses in its assessment areas.

Citizens Trust Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received an "Outstanding" rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated January 24, 2011, under the Intermediate Small Institution Examination Procedures.

¹ Citizens Trust Bank. News Releases. Available at <http://ctbconnect.com/pdf/CitizensTrustBank-%20Lender%20of%20Choice%20-%20Get%20Home%20Now-AffordableHomeLoanProgram.pdf>.

² FDIC. *Economic Inclusion*. Available at <http://www.economicinclusion.gov/>.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The lending test includes an analysis of HMDA loans and samples of commercial and consumer loans originated from January 1, 2010 through December 31, 2011. Performance context information, such as competition, economic climate, and business strategy, was also considered in the evaluation of the bank's lending performance.

Based on the following considerations, the bank's CRA performance rating is outstanding: the loan-to-deposit ratio is reasonable; a majority of loans were originated inside the assessment area; the geographic distribution of loans reflects excellent dispersion throughout the assessment areas; and the distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different revenue sizes.

The following sections detail the bank's performance with regard to each performance criterion.

Loan-to-Deposit Ratio

The bank's net average Loan-to-Deposit (LTD) ratio for the 11 quarters ending September 30, 2012, was 56.3 percent, which is considered reasonable given the bank's size, financial condition, and assessment area credit needs. The bank's average LTD ratio ranged from a low of 52.1 percent as of March 31, 2012 to a high of 60 percent as of September 30, 2010. The bank's average LTD ratio was compared with the average LTD ratios of five other financial institutions of similar asset size with branch offices in the bank's assessment areas. The average LTD ratios for these institutions ranged from 59.8 percent to 99.2 percent.

Assessment Area Concentration

The bank originated a majority of its HMDA, commercial and consumer loans in its assessment areas. As indicated in the table below, 79.6 percent of the total number of loans and 67.2 percent of the total loan dollars were extended to borrowers and businesses inside the bank's assessment areas. This level of lending indicates the bank's willingness to make credit available within the communities where it does business. 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 Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Loan Data	82	82	\$897	85.4	18	18	\$154	14.6
Total Consumer related	82	82	\$897	85.4	18	18	\$154	14.6
Home Improvement	2	100	\$88	100	0	0	\$0	0
Home Purchase - Conventional	22	81.5	\$794	51.7	5	18.5	\$742	48.3
Refinancing	13	81.3	\$469	35.7	3	18.8	\$843	64.3
Total HMDA	37	82.2	\$1,351	46	8	17.8	\$1,585	54
Total Commercial	53	74.6	\$23,696	68.5	18	25.4	\$10,903	31.5
TOTAL LOANS	172	79.6	\$25,944	67.2	44	20.4	\$12,642	32.8

Note: Affiliate loans not included

Distribution of Lending by Geography

For this analysis, the geographic distribution of HMDA, commercial, and consumer loans was compared with available demographic information. The geographic distribution of the loans reviewed reflects excellent dispersion throughout the assessment areas. Performance context issues including the economic climate, business strategies, competition and information from the community contacts were also taken into consideration. The analyses of HMDA, commercial, and consumer lending within each assessment area are discussed in detail later in this report.

Lending to Individuals of Different Income Levels and Businesses of Different Sizes

For this analysis, the distribution of lending across individuals of different income levels and businesses across revenue sizes was compared with available demographic information. The distribution of lending to borrowers reflects reasonable penetration among individuals of different income levels and to businesses of different sizes. The analyses of HMDA, commercial, and consumer lending within each assessment area are discussed in detail later in this report.

COMMUNITY DEVELOPMENT TEST

Citizens Trust Bank’s rating for the community development test is outstanding. The bank demonstrated excellent responsiveness to its assessment areas’ needs through community development loans, investments, and services, considering the bank’s capacity and the need and availability of opportunities in the bank’s assessment areas. In evaluating the bank’s community development performance, consideration was given also to the level of competition in the assessment areas. The bank has greater capacity and opportunity for community development activities in the Atlanta assessment area as compared to the bank’s other three assessment areas. The following table reflects the bank’s total community development activities in all assessment areas for the review period of January 25, 2011 to January 14, 2013.

CITIZENS TRUST BANK - COMMUNITY DEVELOPMENT ACTIVITIES				
Assessment Area	(#) of Loans/Dollar Amount	Investments		Service Hours
		Prior Period	Current Period	
Atlanta	(9) \$9,681,320	0	\$42,470	1,021
Birmingham	(6) \$7,984,458	\$0	\$0	82
Columbus	\$0	\$0	\$0	51
Tuscaloosa	(1) \$323,000	\$76,048	\$0	28
Other Distressed and Designated Federal Disaster Areas	\$0	\$1,255,953	\$0	
Total	(16) \$17,988,778	\$1,332,001	\$42,470	1,182

As reflected in the table above, the bank originated 16 community development loans totaling approximately \$18 million during the review period. The bank made community development investments, grants and donations totaling approximately \$1.4 million, which included a majority that were prior period investments. Bank representatives have used their financial expertise to provide a total of 1,182 community service hours to benefit low- and moderate-income individuals, geographies, and small businesses in its assessment areas. The bank’s community development activities are discussed in more detail in the individual assessment area conclusions.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

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

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

STATE - GEORGIA

CRA RATING FOR GEORGIA: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

SCOPE OF EXAMINATION

Citizens Trust Bank operates in two assessment areas in the state of Georgia; the Atlanta assessment area and the Columbus assessment area. The bank's performance in the state of Georgia was based on a full-scope review of the Atlanta assessment area; a limited-scope review was conducted for the Columbus assessment area, and did not affect the overall rating.

The lending test analysis included a review of HMDA loans and samples of consumer loans and commercial loans originated between January 1, 2010 and December 31, 2011. Community development activities in the state of Georgia from January 25, 2011 to January 14, 2013 were considered for the community development test.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

Overview

Citizens Trust Bank operates 9 of its 11 branch offices (81.8 percent) and 17 of its 19 ATMs (89.5 percent) in Georgia, which includes 8 branch offices and 16 ATMs in the Atlanta assessment area, and one branch office and one ATM in the Columbus assessment area.

Of the bank's total lending inside its four assessment areas, 100 percent of the HMDA loans, 82.9 percent of the consumer loans, and 78.3 percent of the commercial loans, by number, were originated in the Georgia assessment areas.

Population Information

According to the 2000 census data, the population of the combined assessment areas was 2,823,598 persons. According to 2011 census estimates, the state of Georgia grew from 8,186,453 to 9,815,210 (19.9 percent) between 2000 and 2011. Based on the 2000 census, there were 698,764 families in the two assessment areas combined. Of the total number of families, 20.7 percent were low-income, 17.6 percent were moderate-income, 21.1 percent were middle-income, and 40.6 percent were upper-income families; 8.2 percent of families had incomes below the poverty level.

Demographic Data by Census Tracts

The Georgia assessment areas consist of 508 census tracts. Of the 508 census tracts, 78 (15.4 percent) are low-income, 131 (25.8 percent) are moderate-income, 150 (29.5 percent) are middle-income, and 147 (28.9 percent) are upper-income; two census tracts reflect unknown income levels in the Columbus assessment area.

Housing Characteristics

Based on 2000 census data, the total housing units in the Georgia assessment areas was 1,105,993; 58.0 percent were owner-occupied, 36.2 percent were rental units, and 5.8 percent were vacant units. The median housing value in the state of Georgia was \$100,600. Further details on housing characteristics are included in the Atlanta assessment area section of the evaluation.

Competition

The Atlanta assessment area is the most competitive market in which the bank operates. Although the bank has its largest presence in the Atlanta assessment area, the June 30, 2012 FDIC Deposit Market Share Report reflects that the bank ranks 28th out of 79 financial institutions with a deposit market share of 0.29 percent. In the Columbus assessment area, the bank ranks 12th out of 14 financial institutions with a 0.28 percent market share.

Community Contacts

As part of the CRA examination, information was obtained from a local housing organization in the Atlanta assessment area regarding local economic conditions and community needs. Further information specific to that area is contained in the Atlanta assessment area portion of the evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

The lending test for the state of Georgia is outstanding. The geographic distribution of HMDA, consumer, and commercial loans reflects excellent dispersion throughout the assessment areas. The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. The analyses of the bank's lending for each of these loan types within each assessment area are discussed in detail later in this report.

COMMUNITY DEVELOPMENT TEST

The community development test for the state of Georgia is outstanding. The bank's community development performance demonstrates excellent responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, given the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

Citizens Trust Bank originated nine community development loans totaling \$9.7 million in the state of Georgia during the review period, all in the Atlanta assessment area. Details relating to these loans can be found in the Atlanta assessment area section of this report.

Additionally, the bank made qualified investments, grants and donations totaling \$42,470, which supported four organizations in the state of Georgia during the review period, all in its Atlanta assessment area. The organizations provided services to small businesses or had a primary focus to provide services targeted to low- and moderate-income geographies, or individuals and families.

Bank employees also used their financial expertise to provide services that benefit low- and moderate-income individuals and small businesses in the Atlanta assessment area. Community development services were provided at 30 events to 27 different organizations and included approximately 1,072 hours.

**METROPOLITAN AREA – Atlanta, Georgia
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ATLANTA ASSESSMENT AREA

Overview

The Atlanta assessment area has not changed since the previous examination and consists of Clayton, DeKalb, Fayette, Fulton, Gwinnett, Henry, and Rockdale Counties. Out of the bank’s total lending inside its four assessment areas, the Atlanta assessment area represents the majority of HMDA loans (82.2 percent), consumer loans (82.0 percent), and commercial loans (75.9 percent), by number, originated during the review period. The bank operates 8 branches and 16 ATMs (including six stand-alone ATMs) in the Atlanta assessment area, which represents a majority of the bank’s branching network. Based on the demographic data by census tracts table below, the Atlanta assessment area consists of 440 census tracts; 68 (15.5 percent) low-income tracts, 112 (25.5 percent) moderate-income tracts, 129 (29.3 percent) middle-income tracts, and 131 upper-income tracts (29.8 percent).

Population Information

The 2000 census indicates that the population of the assessment area was 2,587,551 persons, representing 31.6 percent of the state of Georgia’s population of 8,186,453. The Atlanta metro area has grown significantly since the 2000 census, with 2011 population estimates of the Atlanta assessment area at 3,136,874; representing growth of 21.3 percent. The Atlanta Metro area is the largest in the Southeast and one of the fastest growing regions in the country. Between 2000 and 2010, metro Atlanta (the 10 counties surrounding the city of Atlanta) was the third fastest growing region in the country, behind Dallas and Houston.³ Between 2010 and 2011, the region ranked 7th nationally in total population added.⁴

Income Characteristics

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development’s (HUD) estimated 2010 and 2011 median family income for the relevant area. The following table sets forth the estimated median family income for 2010 and 2011 for the Atlanta-Sandy Springs-Marietta, GA MSA. It also provides a breakdown of the estimated annual income based on income-level.

**Borrower Income Levels
Atlanta-Sandy Springs-Marietta, GA MSA**

HUD Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2010	\$71,800	0	- \$35,899	\$35,900	- \$57,439	\$57,440	- \$86,159	\$86,160	- & above
2011	\$68,300	0	- \$34,149	\$34,150	- \$54,639	\$54,640	- \$81,959	\$81,960	- & above

³ Atlanta Regional Commission. “Regional Snapshot, State of the Atlanta Region: 2011” November/December, 2011. (Accessed on May 30, 2012). Available from: <http://www.atlantaregional.com/info-center/state-of-the-region-update>

⁴ U.S. Census data provided by the Atlanta Regional Commission. (Accessed on November 5, 2012). Available <http://www.atlantaregional.com/info-center/arc-newsletters/regional-snapshots>

As reflected in the table above, the HUD estimated median family income for the Atlanta, GA MSA in 2010 was \$71,800 and \$68,300 for 2011. According to the 2000 census data, there were 637,439 families in the Atlanta assessment area. Of those families, 20.5 percent were low-income, 17.6 percent were moderate-income, 21.1 percent were middle-income, and 40.8 percent were upper-income. Of the total families, 7.7 percent had incomes below the poverty level.

Demographic Data by Census Tracts

The following table provides demographic characteristics of the bank's assessment area based on the 2000 census. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

Combined Demographics Report

Assessment Area: GA Atlanta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	68	15.5	46,542	7.3	16,065	34.5	130,598	20.5
Moderate-income	112	25.5	141,240	22.2	17,486	12.4	112,083	17.6
Middle-income	129	29.3	220,169	34.5	10,381	4.7	134,574	21.1
Upper-income	131	29.8	229,488	36.0	5,282	2.3	260,184	40.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	440	100.0	637,439	100.0	49,214	7.7	637,439	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	85,339	22,270	3.8	26.1	53,372	62.5	9,697	11.4
Moderate-income	233,962	99,218	16.8	42.4	121,023	51.7	13,721	5.9
Middle-income	333,059	217,172	36.8	65.2	102,776	30.9	13,111	3.9
Upper-income	354,620	251,162	42.6	70.8	85,097	24.0	18,361	5.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	1,006,980	589,822	100.0	58.6	362,268	36.0	54,890	5.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	14,167	5.6	12,438	5.4	998	8.0	731	8.3
Moderate-income	43,635	17.3	39,585	17.1	2,301	18.4	1,749	19.7
Middle-income	85,848	34.0	79,560	34.4	3,342	26.7	2,946	33.3
Upper-income	108,689	43.1	99,392	43.0	5,864	46.9	3,433	38.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	252,339	100.0	230,975	100.0	12,505	100.0	8,859	100.0
Percentage of Total Businesses:				91.5		5.0		3.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	22	2.6	21	2.5	1	5.6	0	0.0
Moderate-income	104	12.2	99	12.0	5	27.8	0	0.0
Middle-income	312	36.7	302	36.5	8	44.4	2	50.0
Upper-income	411	48.4	405	49.0	4	22.2	2	50.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	849	100.0	827	100.0	18	100.0	4	100.0
Percentage of Total Farms:				97.4		2.1		.5

Based on 2011 D&B information according to 2000 Census Boundaries.

Housing Characteristics

According to the 2000 census, there were 1,006,980 housing units in the area; 58.6 percent were owner-occupied units, 36.0 percent were rental units, and 5.5 percent were vacant units. The median housing value in the assessment area was \$137,729, which is 36.9 percent higher than the median housing value for the state of Georgia at \$100,600. The median age of housing in the assessment area was 20 years, which is the same as the median age of housing for the state of Georgia. The affordability ratio for the Atlanta assessment area is 37.5 compared to the state of Georgia at 42.2. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means the housing is considered more affordable while a lower ratio, like the 37.5 for the Atlanta assessment area, means housing is considered less affordable. Therefore, housing in the assessment area is considered less affordable than the state of Georgia.

Employment Statistics

According to the 2011 Regional Economic Information Systems (REIS) data, employment in the Atlanta-Sandy Springs-Marietta MSA was concentrated in the following areas: retail trade; administrative and waste management services; state and local government; professional, scientific and technical services; and health care and social assistance sectors.

The Atlanta MSA is the 8th largest metro area in the country, with more than 3 million jobs. Metro Atlanta consistently ranks in the top five regions with the most FORTUNE 500 headquarters, and is currently home to 10 Fortune 500 companies.⁵ Delta Airlines, AT&T, Emory University, Cox Enterprises, UPS, and WellStar Health Systems are the largest private employers in the region. Other major companies, including Coca Cola and Home Depot, are headquartered in Atlanta. All together, the 20 largest employers in the region employ over 200,000 people.⁶ The Atlanta economy is highly diverse with sectors including retail and wholesale trade; health care; accommodation and food services; services (administrative, professional and technical); finance; construction, transportation and warehousing; information; and local government. Within the assessment area, Fulton, Gwinnett, and DeKalb Counties are the largest employment centers.⁷

The recession had a significant impact on metro Atlanta. From 2008 through 2010, the region lost 194,000 jobs, and job loss continued into 2011.⁸ In fact, the Atlanta region lost more jobs in the 12-month period from August 2010 to August 2011 than any other metro area in the country.⁹ Most of the job losses in the region have been in finance and construction. State and local government budget cuts have also led to a decline in government sector employment.¹⁰ Since 2010, jobs have been added in transportation, administrative services, health care, educational services, and finance and insurance.¹¹

The following table shows the unemployment rates according to the Bureau of Labor Statistics (BLS) for the counties in the Atlanta assessment area, the Atlanta-Sandy Springs–Marietta, GA MSA, and the state of Georgia for 2009, 2010, and 2011.

⁵ Metro Atlanta Chamber. “Metro Atlanta Economic Briefing, Year-End 2011” (accessed on May 30, 2012); available from: <http://metroatlantachamber.com/content/IntPage.aspx?Id=168&SID=6>.

⁶ Metro Atlanta Chamber. “Metro Atlanta Overview” (accessed on May 30, 2012). Available from: <http://metroatlantachamber.com/content/IntPage.aspx?Id=169&SID=6>

⁷ Georgia Department of Labor. (accessed on November 5, 2012); available at: <http://explorer.dol.state.ga.us/mis/profiles.htm>

⁸ U.S. Department of Housing and Urban Development. “Spotlight on the Housing Market in Atlanta-Sandy Springs-Marietta, GA, November 2011” (accessed on May 29, 2012); .available from <http://portal.hud.gov/hudportal/documents/huddoc?id=HUD445AtlScorecard.pdf>.

⁹ Atlanta Regional Commission and Piece by Piece. “A Region Responds, the Neighborhood Stabilization Program” (accessed on May 31, 2012); available from http://atlantaregionalhousing.org/pbp/docs/NSPReport_PBP_ARC.pdf

¹⁰ U.S. Department of Housing and Urban Development. “Spotlight on the Housing Market in Atlanta-Sandy Springs-Marietta, GA, November 2011” (accessed on May 29, 2012); .available from <http://portal.hud.gov/hudportal/documents/huddoc?id=HUD445AtlScorecard.pdf>.

¹¹ Bureau of Economic Analysis, Regional Economic Information Services. April 2012.

Unemployment Rates
Assessment Area: GA Atlanta

Area	Years - Annualized		
	2009	2010	2011
Clayton Co.	11.7	12.5	12.2
Dekalb Co.	9.9	10.6	10.1
Fayette Co.	8.3	8.3	8.1
Fulton Co.	10.0	11.0	10.5
Gwinnett Co.	8.9	9.0	8.5
Henry Co.	9.6	9.9	9.7
Rockdale Co.	11.0	11.2	10.8
Atlanta MSA	9.8	10.2	9.6
Georgia	9.8	10.2	9.8

Not Seasonally Adjusted

The table above reflects that the unemployment rate for the Atlanta-Sandy Springs-Marietta, GA MSA continued to increase from 9.8 percent in 2009 to 10.2 percent in 2010, with slight improvement in 2011 to 9.6 percent. The dramatic increase in the unemployment rate illustrates the difficult economic climate faced in the Atlanta assessment area. The Atlanta assessment area continued to be deeply impacted in 2010 by the nationwide recession that occurred from December 2007 to June 2009. This high unemployment rate typically hinders the ability of potential borrowers to obtain credit. The recession's effects, including the significant job losses, were substantial hindrances to lending in the Atlanta assessment area during the review period.

Competition

The assessment area is highly competitive due to the presence of many banks in the Atlanta assessment area. According to the June 30, 2012 FDIC Deposit Market Share Report, there are 76 financial institutions operating 807 offices in the Atlanta assessment area. With \$241.3 million in deposits, Citizens Trust Bank ranks 26th in the area with a deposit market share of 0.26 percent. The number of offices operated by a single financial institution in the assessment area ranged from one to 137 offices. The institutions with the largest market share in the assessment area include SunTrust Bank at 31.6 percent and 128 offices; Bank of America at 19.1 percent and 101 offices; Wells Fargo Bank at 19.0 percent and 137 offices; and Branch Banking and Trust Company at 5.9 percent and 50 offices. As reflected by the market share percentages and number of branch offices of the other institutions listed, there is strong competition from these large national and regional banks.

Community Contacts

As part of the CRA examination, information was obtained from a local housing organization operating in the Atlanta assessment area. The contact stated that Atlanta was ranked number one in the country for the number of foreclosures in May 2012 and that the need in the metro area for foreclosure prevention and neighborhood stabilization was very high. These foreclosures have disproportionately impacted minority communities and related property values. The community contact noted that there is opportunity in the area for affordable housing given the large number of foreclosures evident in the Atlanta MSA. The continued recession has made the demand for affordable housing much greater than the supply. The contact also stated that there is a need for mortgage lending in general, both for purchase and refinance loans. While the large regional banks and national banks are offering government insured loans such as FHA loans, the underwriting criteria has become too strict.

General Economic and Business Characteristics

According to bank management and the community contact, economic conditions in the assessment area during the review period were still somewhat depressed. Real estate conditions were still in a steep decline with home sales decreasing sharply and foreclosures increasing greatly. Based on information obtained from the community contact, affordable housing demand is higher than the current supply due to the depressed economic conditions. This sentiment was also noted by bank management, which led the bank to continue its FHA lending program. The Atlanta metro area was severely impacted by the housing market downturn. The region has experienced many of the challenges seen across the country, including significant price depreciation, declining sales, and increasing foreclosures. Home prices in metro Atlanta fell by 6 percent in 2010 and 9 percent in 2011, making Atlanta one of the regions with the greatest price depreciation in the country.¹² Housing price decline varies throughout the assessment area, with the sharpest declines occurring in Barrow, Douglas, and Gwinnett Counties.¹³

Most counties in the assessment area have seen a slight improvement in repeat home sales in 2011 over 2010, but overall, home sales remained just a fraction of the peak levels seen in the mid-2000s.¹⁴ Distressed sales represent approximately 40 percent of all existing home sales in the Atlanta market, which has contributed to the depressed sales prices.¹⁵ New home construction has slowed dramatically throughout the assessment area, but activity did appear to be picking up in 2011 in several counties, particularly in Fulton and Forsyth Counties.¹⁶ There is a large inventory of new homes throughout the assessment area, particularly in Fulton, Gwinnett, Forsyth, and Cobb Counties. At the end of 2011, the larger counties in the assessment area had between a 9 and 18 month supply of new homes available, indicating that new residential construction will be limited in the foreseeable future.¹⁷

According to The Beige Book dated November 11, 2011 for the Federal Reserve Bank of Atlanta, several brokers noted that potential buyers continued to face challenges securing financing, while others said that deals were falling through because of changes to appraised values or negative inspection results. Contacts continued to report declining home inventories; however, despite fewer available homes, foreclosures and elevated levels of bank-owned properties continued to put downward pressure on home prices. District brokers anticipate sales growth to be flat over the next several months. In addition, district homebuilders indicated that new home sales and construction activity were flat to slightly down from the previous month and were slightly below weak levels from a year ago.¹⁸

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

For this analysis, HMDA, consumer, and commercial loans originated from January 1, 2010 to December 31, 2011 were reviewed. The bank's strategy during the review period was to meet the credit needs of low- and moderate-income individuals and small businesses in the Atlanta assessment area. Given the economic issues

¹² Atlanta Business Journal. "CoreLogic: Atlanta home prices dropped 9% in '11" February 2, 2012. (Accessed on May 29, 2012); Available from: <http://www.bizjournals.com/atlanta/news/2012/02/02/corelogic-atlanta-home-prices-dropped.html>.

¹³ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic

¹⁴ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic

¹⁵ U.S. Department of Housing and Urban Development. "Spotlight on the Housing Market in Atlanta-Sandy Springs-Marietta, GA, November 2011" (accessed on May 29, 2012); available from <http://portal.hud.gov/hudportal/documents/huddoc?id=HUD445AtlScorecard.pdf>.

¹⁶ Federal Reserve Bank of Atlanta calculations of data from U.S. Census Bureau (BOC): Building Permits-Form C404

¹⁷ Federal Reserve Bank of Atlanta calculations of data provided by MetroStudy.

¹⁸ Federal Reserve, *Beige Book: November 2011*. Available from:

<http://www.federalreserve.gov/monetarypolicy/beigebook/beigebook201111.htm?atlanta>

noted previously including job losses resulting in high unemployment rates, declines in housing values and home sales, and increased number of foreclosures, the bank's volume for HMDA loans in the Atlanta assessment is low. The focus of the bank in 2011 was to target small businesses and individuals and households who reside in or commute to the area. The bank made efforts to reach out to small businesses; however, loan demand was low due high unemployment rates and the lack of robust sales growth.

Geographic Distribution of Loans

The geographic distribution of HMDA, consumer, and commercial loans reflects excellent dispersion throughout the assessment area. For this analysis, the geographic distribution of HMDA, consumer and commercial lending was compared with available demographic information; the distribution of HMDA lending was also compared to aggregate lending data. Performance context issues including the economic climate, business strategies, and information from the community contact were also taken into consideration.

Residential Real Estate (HMDA) Lending

The following table shows the geographic distribution of HMDA loans for 2010 and 2011 in the Atlanta assessment area and also includes a comparison of the bank's HMDA lending to the aggregate HMDA lenders within the assessment area. The HMDA aggregate lenders' data are the combined total of lending activity reported by all lenders subject to HMDA data reporting in the assessment area.

Geographic Distribution of HMDA Loans
Assessment Area: GA Atlanta

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2010			2011								
		Count		Dollar			Bank	Agg	Dollar		Bank	Agg	Count		Dollar			
		#	%	\$ (000s)	\$ %	#			%	%			\$ (000s)	\$ %	%	#	%	%
HOME PURCHASE	Low	4	20.0%	\$133	19.0%	3.8%	0	0.0%	3.7%	\$0	0.0%	3.0%	4	22.2%	3.3%	\$133	22.2%	2.4%
	Moderate	10	50.0%	\$295	42.2%	16.8%	1	50.0%	13.5%	\$29	29.0%	9.5%	9	50.0%	11.8%	\$266	44.4%	8.4%
	Middle	5	25.0%	\$222	31.8%	36.8%	1	50.0%	39.2%	\$71	71.0%	30.0%	4	22.2%	37.7%	\$151	25.2%	27.8%
	Upper	1	5.0%	\$49	7.0%	42.6%	0	0.0%	43.6%	\$0	0.0%	57.5%	1	5.6%	47.2%	\$49	8.2%	61.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	20	100.0%	\$699	100.0%	100.0%	2	100.0%	100.0%	\$100	100.0%	100.0%	18	100.0%	100.0%	\$599	100.0%	100.0%
REFINANCE	Low	2	15.4%	\$65	13.9%	3.8%	1	16.7%	2.0%	\$30	12.5%	1.6%	1	14.3%	1.7%	\$35	15.3%	1.4%
	Moderate	5	38.5%	\$210	44.8%	16.8%	2	33.3%	8.2%	\$147	61.3%	5.9%	3	42.9%	7.9%	\$63	27.5%	5.5%
	Middle	4	30.8%	\$155	33.0%	36.8%	1	16.7%	27.5%	\$24	10.0%	21.0%	3	42.9%	28.5%	\$131	57.2%	21.1%
	Upper	2	15.4%	\$39	8.3%	42.6%	2	33.3%	62.4%	\$39	16.3%	71.6%	0	0.0%	61.8%	\$0	0.0%	72.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	13	100.0%	\$469	100.0%	100.0%	6	100.0%	100.0%	\$240	100.0%	100.0%	7	100.0%	100.0%	\$229	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	1.9%	\$0	0.0%	0.6%	0	0.0%	2.6%	\$0	0.0%	1.7%
	Moderate	1	50.0%	\$68	77.3%	16.8%	1	50.0%	11.5%	\$68	77.3%	5.1%	0	0.0%	13.0%	\$0	0.0%	6.2%
	Middle	1	50.0%	\$20	22.7%	36.8%	1	50.0%	29.2%	\$20	22.7%	15.8%	0	0.0%	33.4%	\$0	0.0%	19.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	57.4%	\$0	0.0%	78.4%	0	0.0%	51.0%	\$0	0.0%	73.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$88	100.0%	100.0%	2	100.0%	100.0%	\$88	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	13.9%	0	0.0%	15.2%	\$0	0.0%	15.9%	0	0.0%	14.4%	\$0	0.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	30.0%	0	0.0%	27.8%	\$0	0.0%	35.1%	0	0.0%	34.4%	\$0	0.0%	17.6%
	Middle	0	0.0%	\$0	0.0%	26.5%	0	0.0%	21.5%	\$0	0.0%	22.4%	0	0.0%	23.3%	\$0	0.0%	25.7%
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	35.4%	\$0	0.0%	26.6%	0	0.0%	27.8%	\$0	0.0%	51.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	17.1%	\$198	15.8%	3.8%	1	10.0%	2.7%	\$30	7.0%	2.6%	5	20.0%	2.5%	\$168	20.3%	2.0%
	Moderate	16	45.7%	\$573	45.6%	16.8%	4	40.0%	10.6%	\$244	57.0%	8.2%	12	48.0%	9.7%	\$329	39.7%	7.1%
	Middle	10	28.6%	\$397	31.6%	36.8%	3	30.0%	32.6%	\$115	26.9%	24.3%	7	28.0%	32.6%	\$282	34.1%	23.8%
	Upper	3	8.6%	\$88	7.0%	42.6%	2	20.0%	54.1%	\$39	9.1%	64.8%	1	4.0%	55.2%	\$49	5.9%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	35	100.0%	\$1,256	100.0%	100.0%	10	100.0%	100.0%	\$428	100.0%	100.0%	25	100.0%	100.0%	\$828	100.0%	100.0%

Originations & Purchases

Although lending levels are low, there was a positive trend in the volume of lending from 2010 to 2011. The bank's HMDA lending in low-income tracts at 17.1 percent was significantly higher than the percentage of owner-occupied units in these tracts at 3.8 percent. The bank's HMDA lending in moderate-income tracts at 45.7 percent was also significantly higher than the percentage of owner-occupied units in these tracts at 16.8 percent. When compared to the 2010 and 2011 aggregate data, the bank's HMDA lending in low-income tracts at 10 percent and 20 percent, respectively, was significantly higher than the aggregate performance at 2.7 percent and 2.5 percent, respectively. Additionally, the bank's lending in moderate-income tracts at 40 percent and 48 percent also outperformed the aggregate at 10.6 percent and 9.7 percent, respectively.

It should be noted that several of the loans were 1-4 family homes that were purchased and used as rental houses in conjunction with the housing choice voucher program through the Atlanta Housing Authority. Further details about the program are noted in the borrower distribution section for HMDA.

Considering performance context issues such as economic conditions, the level of competition, and in comparison to the aggregate lenders, the geographic distribution of HMDA lending reflects excellent dispersion throughout the Atlanta assessment area.

Consumer Lending

The following table shows the geographic distribution of consumer loans sampled in the assessment area. Selected demographic information about the census tracts is included as a basis for comparison.

Geographic Distribution of Consumer Loans

Assessment Area: GA Atlanta

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Count		Dollar		Demographics
	#	%	\$ (000s)	\$ %	Households %
Low	10	16.4%	\$71	11.1%	8.0%
Moderate	12	19.7%	\$104	16.2%	23.1%
Middle	23	37.7%	\$219	34.3%	33.6%
Upper	16	26.2%	\$245	38.5%	35.3%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>61</i>	<i>100.0%</i>	<i>\$638</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Of the consumer loans sampled, 16.4 percent were originated in low-income tracts, which is substantially greater than the percentage of households in low-income census tracts at 8.0 percent. Furthermore, 19.7 percent of the consumer loans sampled were made in moderate-income tracts, which is less than the percentage of households in moderate-income tracts in the assessment area at 23.1 percent. Overall, the level of consumer lending in low- and moderate-income tracts shows the bank's willingness to serve the credit needs in low- and moderate-income geographies in the Atlanta assessment area. Considering the economic conditions, bank's strategy, and the bank's level of lending, the bank's consumer lending reflects excellent geographic distribution in the Atlanta assessment area.

Commercial Lending

The following table shows the geographic distribution of commercial loans within its Atlanta assessment area.

Geographic Distribution of Commercial Loans

Assessment Area: GA Atlanta

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Count		Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	6	18.8%	\$8,212	64.1%	5.4%
Moderate	8	25.0%	\$2,233	17.4%	17.1%
Middle	7	21.9%	\$1,058	8.3%	34.4%
Upper	11	34.4%	\$1,315	10.3%	43.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>32</i>	<i>100.0%</i>	<i>\$12,818</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2011 D&B information according to 2000 Census Boundaries.

Of the 32 loans sampled in the Atlanta assessment area, 18.8 percent were extended to businesses in low-income tracts, which is significantly higher than the percentage of small businesses located in these tracts at 5.4 percent. In addition, 25 percent of the loans were extended to businesses in moderate-income tracts, which is slightly higher than the percentage of small businesses located in these tracts at 17.1 percent. Considering the economic conditions, bank's strategy, and the bank's level of lending, the bank's commercial lending reflects excellent geographic distribution in the Atlanta assessment area.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The bank's lending performance to borrowers of different income levels and businesses of different sizes reflects reasonable penetration among income levels and business sizes. For this analysis, the distribution of HMDA and consumer lending across borrower income levels, and commercial lending across business revenue sizes was compared with available demographic information; the distribution of HMDA lending was also compared to aggregate lending data. Performance context issues were also considered, including competition and economic climate.

Residential Real Estate (HMDA) Lending

The following table shows the distribution of the bank's 2010 and 2011 HMDA-reportable loans by the income level of the borrowers.

Borrower Distribution of HMDA Loans

Assessment Area: GA Atlanta

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2010					2011						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
						#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	3	15.0%	\$152	21.7%	20.5%	1	50.0%	18.2%	\$71	71.0%	9.2%	2	11.1%	14.5%	\$81	13.5%	6.8%
	Moderate	3	15.0%	\$131	18.7%	17.6%	0	0.0%	26.4%	\$0	0.0%	19.2%	3	16.7%	21.5%	\$131	21.9%	14.4%
	Middle	1	5.0%	\$42	6.0%	21.1%	0	0.0%	18.3%	\$0	0.0%	17.8%	1	5.6%	17.0%	\$42	7.0%	15.2%
	Upper	1	5.0%	\$29	4.1%	40.8%	1	50.0%	27.9%	\$29	29.0%	45.6%	0	0.0%	32.4%	\$0	0.0%	50.8%
	Unknown	12	60.0%	\$345	49.4%	0.0%	0	0.0%	9.2%	\$0	0.0%	8.2%	12	66.7%	14.5%	\$345	57.6%	12.8%
	Total	20	100.0%	\$699	100.0%	100.0%	2	100.0%	100.0%	\$100	100.0%	100.0%	18	100.0%	100.0%	\$599	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	4.4%	\$0	0.0%	2.2%	0	0.0%	4.1%	\$0	0.0%	2.0%
	Moderate	1	7.7%	\$15	3.2%	17.6%	1	16.7%	11.8%	\$15	6.3%	7.4%	0	0.0%	8.9%	\$0	0.0%	5.4%
	Middle	1	7.7%	\$32	6.8%	21.1%	1	16.7%	17.6%	\$32	13.3%	14.0%	0	0.0%	13.9%	\$0	0.0%	10.4%
	Upper	1	7.7%	\$24	5.1%	40.8%	1	16.7%	47.3%	\$24	10.0%	60.1%	0	0.0%	48.6%	\$0	0.0%	62.0%
	Unknown	10	76.9%	\$398	84.9%	0.0%	3	50.0%	19.0%	\$169	70.4%	16.3%	7	100.0%	24.6%	\$229	100.0%	20.1%
	Total	13	100.0%	\$469	100.0%	100.0%	6	100.0%	100.0%	\$240	100.0%	100.0%	7	100.0%	100.0%	\$229	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	10.0%	\$0	0.0%	2.6%	0	0.0%	10.8%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	17.1%	\$0	0.0%	8.6%	0	0.0%	17.9%	\$0	0.0%	7.0%
	Middle	1	50.0%	\$20	22.7%	21.1%	1	50.0%	19.3%	\$20	22.7%	12.7%	0	0.0%	17.1%	\$0	0.0%	11.9%
	Upper	1	50.0%	\$68	77.3%	40.8%	1	50.0%	48.8%	\$68	77.3%	68.6%	0	0.0%	46.1%	\$0	0.0%	66.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.8%	\$0	0.0%	7.5%	0	0.0%	8.1%	\$0	0.0%	11.4%
	Total	2	100.0%	\$88	100.0%	100.0%	2	100.0%	100.0%	\$88	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	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%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	8.6%	\$152	12.1%	20.5%	1	10.0%	10.4%	\$71	16.6%	4.7%	2	8.0%	8.8%	\$81	9.8%	3.8%
	Moderate	4	11.4%	\$146	11.6%	17.6%	1	10.0%	18.2%	\$15	3.5%	11.6%	3	12.0%	14.6%	\$131	15.8%	8.6%
	Middle	3	8.6%	\$94	7.5%	21.1%	2	20.0%	17.9%	\$52	12.1%	14.9%	1	4.0%	15.3%	\$42	5.1%	11.8%
	Upper	3	8.6%	\$121	9.6%	40.8%	3	30.0%	38.9%	\$121	28.3%	52.7%	0	0.0%	41.4%	\$0	0.0%	55.1%
	Unknown	22	62.9%	\$743	59.2%	0.0%	3	30.0%	14.6%	\$169	39.5%	16.1%	19	76.0%	19.9%	\$574	69.3%	20.7%
	Total	35	100.0%	\$1,256	100.0%	100.0%	10	100.0%	100.0%	\$428	100.0%	100.0%	25	100.0%	100.0%	\$828	100.0%	100.0%

Originations & Purchases

Of the bank's total HMDA lending, 8.6 percent were originated to low-income borrowers, which is significantly less than the percentage of low-income families in the assessment area at 20.5 percent. In addition, the bank's HMDA lending to moderate-income borrowers at 11.4 percent was also less than the percentage of moderate-income families in the assessment area at 17.6 percent. When comparing the bank's performance to the 2010 and 2011 aggregate data, the bank's HMDA lending to low-income borrowers at 10.0 percent and 8.0 percent, respectively, is slightly below the 2010 and 2011 aggregate performance, at 10.4 percent and 8.8 percent, respectively. In addition, the bank's HMDA lending to moderate-income borrowers at 10.0 percent and 12.0 percent, respectively, is less than the 2010 and 2011 aggregate performance at 18.2 percent and 14.6 percent, respectively.

The high level of unemployment in 2010 and 2011, the significant level of competition from other financial institutions, ongoing weakness in home sales and construction, and the increased percentage of foreclosures which continued to put downward pressure on home prices in the Atlanta area, may have impacted the bank's ability to lend to low-income and moderate-income borrowers in the Atlanta assessment area. Considering the economic conditions, the bank's strategy and level of lending, HMDA lending reflects reasonable penetration to borrowers of different income levels in the Atlanta assessment area.

In addition, 22 of the 35 loans, or 62.9 percent, were to businesses for investment purposes; the bank is not required to collect income information on HMDA loans originated to businesses. A majority of the 22 loans were 1-4 family homes that were purchased and used as rental houses in conjunction with the housing choice voucher program. The housing choice voucher program is the federal government's major program for assisting very low-income families, the elderly, and the disabled, to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments. Housing choice vouchers are administered locally by public housing agencies (PHAs).

The public housing agency that administered the vouchers for the loans mentioned above is the Atlanta Housing Authority (AHA). The AHA is organized under the Georgia law to develop, acquire, lease and operate affordable housing for low-income families. AHA is the largest housing agency in Georgia and one of the largest in the United States serving approximately 50,000 people. The Atlanta Housing Authority FY 2011 Report states that through AHA's Housing Choice Tenant-Based Voucher Program, AHA utilizes real estate business practices and strategic policies to enable families to choose quality affordable housing opportunities in more economically diverse neighborhoods that offer better amenities and opportunities throughout the City of Atlanta.

Consumer Lending

The following table shows the distribution of the bank's 2010 and 2011 consumer loans by the income level of the borrowers. It should be noted that consumer loans are compared to "households" by household income as a proxy for performance, as opposed to "families" by family income, as is the comparator for HMDA loans. For the purposes of the CRA, "household" is defined as "all persons occupying a housing unit." By comparison, "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."

Borrower Distribution of Consumer Loans

Assessment Area: GA Atlanta

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Bank				Demographics Households by Household Incomes
	Count		Dollar		
#	%	\$ (000s)	\$ %	%	
Low	21	34.4%	\$207	32.5%	8.0%
Moderate	13	21.3%	\$102	15.9%	23.1%
Middle	9	14.8%	\$61	9.5%	33.6%
Upper	13	21.3%	\$227	35.5%	35.3%
Unknown	5	8.2%	\$42	6.6%	0.0%
<i>Total</i>	<i>61</i>	<i>100.0%</i>	<i>\$638</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Of the 61 consumer loans sampled in the Atlanta assessment area, 34.4 percent were extended to low-income borrowers, which is significantly higher than the percentage of low-income households at 8.0 percent. Consumer lending to moderate-income borrowers at 21.3 percent is slightly below the percentage of moderate-income households in the assessment area at 23.1 percent. Based on the bank's lending levels as compared to the demographics, Citizens Trust Bank exhibits an excellent distribution of consumer loans to borrowers of different income levels.

Commercial Lending

The following table shows, by loan size, the number and dollar volume of commercial loans sampled during the review period.

Commercial Loans by Business Revenue & Loan Size

Assessment Area: GA Atlanta

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010, 2011				
		Bank				Total Businesses
		Count		\$ (000s)		
#	%	\$	%	%		
BUSINESS REVENUE	\$1million or Less	23	71.9%	\$4,143	32.3%	91.5%
	Over \$1 Million	9	28.1%	\$8,674	67.7%	5.0%
	<i>Total Rev. available</i>	32	100.0%	\$12,818	100.0%	96.5%
	Rev. Not Known	0	0.0%	\$0	0.0%	3.5%
	<i>Total</i>	32	100.0%	\$12,818	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	16	50.0%	\$418	3.3%	
	\$100,001 - \$250,000	8	25.0%	\$1,361	10.6%	
	\$250,001 - \$1 Million	4	12.5%	\$2,487	19.4%	
	Over \$1 Million	4	12.5%	\$8,552	66.7%	
	<i>Total</i>	32	100.0%	\$12,818	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	13	56.5%	\$323	7.8%	
	\$100,001 - \$250,000	6	26.1%	\$968	23.4%	
	\$250,001 - \$1 Million	3	13.0%	\$1,487	35.9%	
	<i>Total</i>	22	95.6%	\$2,777	67.1%	

Originations & Purchases
Based on 2011 D&B

Of the 32 commercial loans sampled, 23, or 71.9 percent, were originated to businesses with gross annual revenues of \$1 million or less, which is less than the percentage of total businesses that have gross annual revenues of \$1 million or less, at 91.5 percent. However, of the 32 commercial loans, 24 loans (75.0 percent) were in loan amounts of \$250,000 or less; and 19 of those loans were made to businesses with reported revenue of \$1 million or less. This level of lending to small businesses in small dollar amounts shows the bank’s willingness to make credit available to small businesses in the Atlanta assessment area.

Given the bank’s overall commercial lending performance and the economic conditions present during the review period, the bank’s distribution of loans to businesses of different sizes is considered reasonable.

COMMUNITY DEVELOPMENT TEST

Citizens Trust Bank’s community development performance demonstrates excellent responsiveness to the community development needs of the assessment area through community development loans, qualified investments and donations, and community development services, considering the institution’s capacity and the need and availability of such opportunities for community development in the Atlanta assessment area. Community development activities for the period January 25, 2011 to January 14, 2013 were considered in this analysis.

Citizens Trust Bank originated nine community development loans in the Atlanta assessment area totaling approximately \$9.7 million, which are listed in the table below.

Citizens Trust Bank Community Development Loans - Atlanta Assessment Area		
Purpose	# of Loans	\$ Amount
Community Services	2	\$3,300,000
Affordable Housing	2	\$781,000
Revitalization and Stabilization	5	\$5,600,320
Total	9	\$9,681,320

Through the community contact, the needs of the Atlanta assessment area were identified as revitalization of certain areas of the city along with affordable housing for the area, which were addressed by the bank’s community development lending. Citizens Trust Bank is also a participant in SBA lending programs, specifically offering the SBA 7(a) and 504 loan products. Citizens Trust Bank has addressed specific needs of the community through its community development lending and innovative lending programs.

Additionally, the bank made qualified investments, grants and donations totaling \$42,470, which supported four organizations in the Atlanta assessment area. The organizations provided services to small businesses or had a primary focus to provide services targeted to low- and moderate-income areas, or individuals and families.

Bank employees used their financial expertise to provide services that benefit low- and moderate-income residents and small businesses in the Atlanta assessment area. Community development services were provided at 26 events to 23 organizations and included approximately 1,021 hours. The majority of the services were to provide technical assistance on financial matters to small businesses, and homebuyer counseling. Regarding technical assistance to small businesses, the events included three small business mixers hosted at the bank’s main office, presentations made by employees at three different sessions of the DeKalb Small Business Capacity Building Series, and participation by two employees as mentors for two small business owners in the Governor’s Mentor Protégé Program.

**METROPOLITAN AREA – Columbus, Georgia
 LIMITED-SCOPE REVIEW**

Overview

The Columbus assessment area included Muscogee County, Georgia and Russell County, Alabama, and is a portion of the Columbus, GA-AL MSA. The Columbus assessment area was not reviewed as a multistate MSA because the bank does not have branches in both states in the MSA. The Columbus assessment area was reviewed using limited-scope examination procedures and did not impact the state of Georgia analysis. Through these procedures, conclusions regarding the institution’s CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed the bank’s CRA performance in this assessment area is not consistent with the area that received a full-scope review. Please refer to the tables in Appendix B for additional information regarding this area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE COLUMBUS ASSESSMENT AREA

The bank operates one branch office and one branch-based ATM in the Columbus assessment area. According to the 2012 FDIC’s Deposit Market Share report, the bank ranks 12th out of 14 banks that operate in the area with a market share of 0.28 percent. The Columbus assessment area is composed of 68 total census tracts; 10 (14.7 percent) are low-income tracts and 19 (27.9 percent) are moderate-income tracts.

CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS IN COLUMBUS, GA

Due to the bank’s small presence in the Columbus assessment area, lending levels were considerably lower than the bank’s full-scope assessment area. Although the bank’s lending performance was lower in this assessment area than the bank’s overall performance, aggregate lending was also low when compared to the demographics. Regarding community development activities, the bank did not originate any community development loans or investments; however, bank employees used their financial expertise to provide community development services to four organizations totaling approximately 51 hours of services. Overall, the bank’s community development performance was lower in this assessment area than the bank’s overall performance. The following table compares conclusions regarding the bank’s performance in the Columbus assessment area to the bank’s overall performance.

Performance in the Limited-scope Review Metropolitan Assessment Areas		
Assessment Area	Lending Test	Community Development
Columbus, Georgia	Not Consistent - Below	Not Consistent - Below

STATE – ALABAMA

CRA RATING FOR ALABAMA: Satisfactory.

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

The Community Development Test is rated: **Outstanding.**

SCOPE OF EXAMINATION

The bank's performance in Alabama was evaluated by reviewing the Birmingham assessment area using full-scope examination procedures, and the Tuscaloosa assessment area using limited-scope examination procedures. The lending test included a review of HMDA loans and a sample of commercial and consumer loans, originated from January 1, 2010 to December 31, 2011. Community development activities from January 25, 2011 to January 14, 2013 were considered for the community development test.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

Overview

Citizens Trust Bank operates two branches and two branch-based ATMs in the state of Alabama – one branch and one ATM in each of its assessment areas. This represents 18.1 percent of the bank's branching network. The bank's assessment areas have not changed since the previous examination and are as follows:

- Birmingham assessment area – which consists of Jefferson and Shelby Counties and is part of the Birmingham-Hoover, Alabama MSA
- Tuscaloosa assessment area – which consists of Greene and Hale Counties and is part of the Tuscaloosa, Alabama MSA

Of the bank's total lending, 18.9 percent of the commercial loans and 17.1 percent of the consumer loans, by number, were originated in the Alabama assessment areas during the review period. The bank did not originate any HMDA loans in Alabama.

Population Information

Based on 2000 census data, the two Alabama assessment areas have a combined population of 832,499, representing 18.7 percent of the state's total population of 4,447,100. There were 225,445 families in the two assessment areas combined. Of the total number of families, 21.0 percent were low-income, 16.3 percent were moderate-income, 19.6 percent were middle-income, and 43.0 percent were upper-income families. Furthermore, 10.8 percent of families had incomes below the poverty level in these assessment areas.

Demographic Data by Census Tracts

The Alabama assessment areas consist of 188 census tracts; 16 (8.5 percent) are low-income, 53 (28.2 percent) are moderate-income, 59 (31.4 percent) are middle-income, and 60 (31.9 percent) are upper-income.

Housing Characteristics

Based on the 2000 census, the total number of housing units in the Alabama assessment areas is 360,337; 63.1 percent are owner-occupied, 28.0 percent are rental units, and 8.9 percent are vacant units. The median housing value for the state of Alabama is \$76,700. More detailed information on housing characteristics can be found in the Birmingham assessment area section of the evaluation.

Competition

Based on the 2012 FDIC's Deposit Market Share Report, Citizens Trust Bank ranks 31st out of 38 financial institutions operating in the Birmingham assessment area, and 5th out of 5 banks in the Tuscaloosa assessment area; the bank operates only one branch in each of the two assessment areas and has a limited presence in each assessment area.

Community Contacts

As part of the CRA examination, information was obtained from a community development organization in the Birmingham assessment area regarding local economic conditions and community needs. Refer to the full-scope examination analysis of the Birmingham assessment area for more information specific to that area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The lending test for the state of Alabama is satisfactory. The geographic distribution of consumer and commercial loans both reflect reasonable dispersion throughout the assessment areas; no HMDA loans were originated in Alabama. The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. The analyses of the bank's lending within each assessment area are discussed in detail later in this report.

COMMUNITY DEVELOPMENT TEST

The community development test for the state of Alabama is outstanding. The bank's community development performance demonstrates excellent responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

Citizens Trust Bank originated seven community development loans totaling \$8.3 million in the state of Alabama during the review period. Of the seven loans, three had a purpose of stabilizing or revitalizing particular low- or moderate-income areas because the activity is consistent with a bona fide government revitalization or stabilization plan; two provided economic development by financing small businesses; one was for affordable housing construction of a multifamily rental property serving low- and moderate-income persons; and one was for health services targeted to low- or moderate-income persons.

The bank did not have any current period qualified investments, grants and donations; however, there were two prior period investments totaling \$1.3 million. The two investments were in locations outside of the bank's assessment areas but within the state of Alabama and benefited geographies located within a broader statewide or regional area that includes the institution's assessment area.

Bank employees used their financial expertise to provide services that benefit low- and moderate-income residents and small businesses in the Alabama assessment areas. Community development services were provided to 8 organizations and included approximately 110 hours.

**METROPOLITAN AREA – Birmingham, Alabama
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BIRMINGHAM ASSESSMENT AREA

Overview

Citizens Trust Bank has designated a portion of the Birmingham-Hoover, Alabama MSA as its Birmingham assessment area. The Birmingham assessment area is composed of Jefferson and Shelby Counties, which remains the same from the previous examination. The bank operates one branch and one ATM (branch-based) in the Birmingham assessment area. The bank has not opened or closed any branches in the Birmingham assessment area since the previous examination. Based on 2000 census data, the Birmingham assessment area contains a total of 179 census tracts; 16 (8.9 percent) are low-income tracts, 46 (25.7 percent) are moderate-income tracts; 57 are middle-income tracts (31.8 percent), and 60 are upper-income tracts (33.5 percent).

Population Information

The 2000 census indicates that the population of the Birmingham assessment area was 805,340 persons, which represents 18.1 percent of the state of Alabama’s population of 4,447,100 persons. The assessment area population has grown since 2000 with estimates from July 1, 2011 of 856,867, representing growth of 6.4 percent.

The assessment area experienced faster growth between 2000 and 2010 than elsewhere in the state, but the growth was uneven. New suburban jurisdictions that did not even exist several decades ago grew the fastest, while the city of Birmingham experienced a population loss of approximately 12.7 percent between 2000 and 2010.¹⁹

Income Characteristics

Income in the assessment area rose in the last decade, but there is significant variation in median family income among the two counties. Data from the 2010 American Community Survey indicates that estimated median family income in Jefferson County was \$51,458 and \$81,406 in Shelby County. Median family income in Birmingham was only \$38,460, indicating that the urban center of the region is also the lowest income and where many of the community development opportunities exist. Overall, the estimated median family income in the state of Alabama, at \$51,989, was higher than Jefferson County but significantly lower than Shelby County.

The following table sets forth the estimated median family income for 2010 and 2011 for the Birmingham-Hoover, Alabama MSA. It also provides a breakdown of the estimated annual income based on income-level. The HUD estimated median family income for the Birmingham-Hoover, Alabama MSA in 2010 and 2011 was \$60,700 and \$62,000, respectively. According to the 2000 census data, there were 218,106 families in the assessment area. Of those families, 20.4 percent were low-income, 16.2 percent were moderate-income, 19.7 percent were middle-income, and 43.6 percent were upper-income. Of the total families, 10.3 percent had incomes below the poverty level.

¹⁹ U.S. Census Bureau. Accessed through PolicyMap (accessed on October 23, 2012); available from <http://www.policymap.com>

Borrower Income Levels
Birmingham-Hoover, AL MSA

HUD Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2010	\$61,700	0	- \$30,849	\$30,850	- \$49,359	\$49,360	- \$74,039	\$74,040	- & above
2011	\$62,000	0	- \$30,999	\$31,000	- \$49,599	\$49,600	- \$74,399	\$74,400	- & above

Poverty and financial instability are concerns throughout the assessment area. The percentage of people living in poverty increased between 2000 and 2009 in the assessment area. More than 15 percent of the people living in Jefferson County were living in poverty between 2005 and 2009. Alabama is considered one of the poorer states in the country, and statewide, 16.8 percent of the population was living in poverty between 2005 and 2009. Food stamp usage, another indicator of financial distress, has also been rising. In 2009, 15.4 percent of the population in Jefferson County was receiving food stamps; Shelby County had the lowest percentage of people receiving food stamps at 5.6 percent.²⁰

Demographic Data by Census Tracts

The table on the following page provides demographic characteristics of the bank's assessment area based on the 2000 census. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

²⁰ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from <http://www.policymap.com>

Combined Demographics Report

Assessment Area: AL Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	8.9	12,468	5.7	5,203	41.7	44,593	20.4
Moderate-income	46	25.7	46,037	21.1	9,514	20.7	35,442	16.2
Middle-income	57	31.8	70,970	32.5	5,533	7.8	42,965	19.7
Upper-income	60	33.5	88,631	40.6	2,281	2.6	95,106	43.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	179	100.0	218,106	100.0	22,531	10.3	218,106	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	25,276	6,654	3.0	26.3	14,136	55.9	4,486	17.7
Moderate-income	80,182	41,564	19.0	51.8	29,582	36.9	9,036	11.3
Middle-income	112,941	74,576	34.0	66.0	29,248	25.9	9,117	8.1
Upper-income	129,065	96,408	44.0	74.7	25,728	19.9	6,929	5.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	347,464	219,202	100.0	63.1	98,694	28.4	29,568	8.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	5,583	9.9	4,709	9.2	666	18.1	208	10.4
Moderate-income	7,454	13.2	6,676	13.1	488	13.3	290	14.5
Middle-income	16,268	28.7	14,742	28.9	915	24.9	611	30.6
Upper-income	27,324	48.3	24,824	48.7	1,611	43.8	889	44.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	56,629	100.0	50,951	100.0	3,680	100.0	1,998	100.0
Percentage of Total Businesses:				90.0		6.5		3.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	4	1.4	4	1.4	0	0.0	0	0.0
Moderate-income	11	3.7	11	3.9	0	0.0	0	0.0
Middle-income	123	41.8	118	41.8	4	36.4	1	100.0
Upper-income	156	53.1	149	52.8	7	63.6	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	294	100.0	282	100.0	11	100.0	1	100.0
Percentage of Total Farms:				95.9		3.7		.3

Based on 2011 D&B information according to 2000 Census Boundaries.

Housing Characteristics

Based on 2000 census data, the assessment area had 347,464 total housing units; 63.1 percent were owner-occupied, 28.4 percent were rental units, and 8.5 percent were vacant. The median value of housing units in the assessment area was \$96,147, which was significantly higher than the state of Alabama’s median housing value of \$76,700. The median age of housing in the area was 29 years, which is higher than the state of Alabama at 25 years. The affordability ratio, which as previously noted is the median household income divided by the median housing value, for the assessment area is 41.3 compared to the state affordability ratio of 44.5. This means that housing in the Birmingham area is less affordable than for the entire state.

Home sales in Birmingham, while still significantly below the peak sales in 2006, have increased by almost 50 percent since August 2010 according to the Alabama Center for Real Estate at the University of Alabama. Median home prices have also declined from the peak, but have been increasing since 2009. In August 2012, the median home price in the area was \$155,000.²¹ The housing market in the assessment area mirrors the trends at the state level, where home sales and median prices have also dropped significantly since peak levels, but have shown signs of stabilizing in the last two years. For the state, the median sales price was \$127,383 in August 2012.²²

New home construction in the assessment area slowed significantly with single-family building permits down 77 percent from 6,870 in 2005 to 1,555 in 2010. Since 2010, new residential activity has been increasing but building permits remain well below the peak at 1,784 in 2011.²³ Most of the new construction is occurring in a handful of subdivisions in Jefferson County (outside the city of Birmingham) and in Shelby County.

Employment Statistics

According to 2011 Regional Economic Information Systems (REIS) data, employment in the Birmingham assessment area was concentrated in the following sectors: retail trade; state and local government; health care and social assistance; and finance and insurance. The following table shows the unemployment rate percentages from the Bureau of Labor Statistics (BLS) for the counties in the bank’s assessment area, the Birmingham-Hoover, AL MSA, and the State of Alabama for 2009, 2010, and 2011.

Unemployment Rates
Assessment Area: AL Birmingham

Area	Years - Annualized		
	2009	2010	2011
Jefferson Co.	9.7	9.4	8.7
Shelby Co.	7.0	6.9	6.3
Birmingham MSA	9.2	8.9	8.3
Alabama	9.9	9.5	9.0

Not Seasonally Adjusted

Birmingham was historically an industrial city, dominated by the steel industry. However, the economy in the Birmingham MSA has become much more diverse. The manufacturing sector now accounts for just 7.3 percent of total employment and has been replaced by the service sector as the dominant source of jobs. Auto suppliers

²¹ Alabama Center for Real Estate, University of Alabama. August, 2012. (Accessed October 23, 2012); available at: http://acre.cba.ua.edu/store/store_files/Birmingham_Report-1767.pdf.

²² Alabama Center for Real Estate, University of Alabama. August, 2012. (Accessed October 23, 2012); available at: http://acre.cba.ua.edu/store/store_files/Birmingham_Report-1767.pdf.

²³ U.S. Census Bureau Residential Construction Branch. Accessed through PolicyMap. (accessed on September 4, 2012); available from <http://www.policymap.com>

are among the strongest employers within the region's manufacturing sector. Government agencies also provide stable employment in the region and despite changes in the financial services landscape, Birmingham remains one of the financial centers in the Southeast.²⁴ The University of Alabama at Birmingham is the largest employer in the region with almost 19,000 employees. Other employers include Regions Bank, AT&T, St. Vincent's Health System, Honda Manufacturing of Alabama, Baptist Health System, Inc., the City of Birmingham, and the Birmingham and Jefferson County Boards of Education.²⁵

Like the Atlanta assessment area, the unemployment data shows the impact that the nationwide recession has had on the Birmingham assessment area. Although the unemployment rate is trending down in the assessment area, in the Birmingham-Hoover, AL MSA, and in the state of Alabama, the continuing slow economic recovery and job loss in the area will hinder the ability of potential borrowers to obtain credit, which highlights the difficulty banks face in the area during the slow economic recovery.

Competition

The Birmingham assessment area is a highly competitive market based on the number of banks and offices in the area according to the June 30, 2012 FDIC Deposit Market Share report. There are 38 financial institutions operating 277 offices in the assessment area. Citizens Trust Bank ranks 31st in the area with a market share of 0.20 percent. The banks with the highest market share in the area are Regions Bank, Compass Bank, and Wells Fargo Bank with 37.1 percent, 18.8 percent, and 12.9 percent of the deposit market share, respectively.

Community Contacts

As part of the CRA examination, information was obtained from a local economic development organization regarding the current economic conditions and credit needs in the Birmingham assessment area, specifically in regard to small businesses. The contact stated that although Birmingham has been hurt by the recession, things are starting to improve. Unemployment is trending downward as the service sector makes rebounds, mainly in the area of new restaurant openings. Additionally, the automobile supplier sector is also starting to make a very good recovery. The contact mentioned that mortgage delinquencies and home foreclosures are still a big problem. Opportunities to aid small businesses and the revitalization of the metro Birmingham area still exist.

General Economic and Business Characteristics

According to bank management and the community contact, while economic conditions in the assessment area are starting to experience modest improvement, mortgage delinquencies and foreclosures are still challenges throughout the region because of the effects of the nationwide recession. The community contact stated that Birmingham is starting to recover as a result of improvement in the service sector (more restaurants opening) and improvement in the auto supplier sector.

According to the 2012 Small Business Profile for the state of Alabama prepared by the Small Business Administration Office of Advocacy²⁶, most of Alabama's small businesses are very small as 80.9 percent of all businesses have no employees, and most employers have fewer than 20 employees. The employment situation from 2007-2010 was weak, and small businesses in Alabama had a net job loss.

²⁴ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Birmingham-Hoover 2012; (accessed October 29, 2012); available at: http://cber.cba.ua.edu/pdf/EconomicOutlook_Metro2012/Birmingham-Hoover.pdf

²⁵ US Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Birmingham-Hoover, Alabama, April 2011" (accessed October 29, 2012); available at http://www.huduser.org/portal/publications/PDF/BirminghamAL_Comp.pdf.

²⁶ Small Business Administration Office of Advocacy. 2012 Small Business Profile for Alabama. Available at: <http://www.sba.gov/sites/default/files/al12.pdf>.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BIRMINGHAM

LENDING TEST

Overview

For this analysis, HMDA, consumer, and commercial loans originated from January 1, 2010 to December 31, 2011 were reviewed. The bank's main focus in this assessment area is commercial lending; no HMDA loans were originated during the review period. The focus of the bank in 2011 was to target small businesses and individuals and households who reside in or commute to the area. The bank has a limited presence in the assessment with only one branch, and also faces a highly competitive market.

Geographic Distribution of Loans

Based on the following analysis, the overall geographic distribution of the bank's consumer and commercial loans reflects reasonable dispersion throughout the Birmingham assessment area. For this analysis, the geographic distribution of consumer and commercial lending was compared with available demographic information. Performance context issues considered include the economic climate, business strategy, competition, and information obtained from the community contact.

Residential Real Estate (HMDA) Lending

The table on the following page shows the geographic distribution of HMDA lending in the Birmingham assessment area (Jefferson and Shelby Counties) as reported by the aggregate lenders. Citizens Trust Bank did not originate any HMDA loans during the review period.

Geographic Distribution of HMDA Loans
Assessment Area: AL Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2010			2011								
		Count		Dollar			Count		Dollar		Count		Dollar		Dollar			
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	0.7%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	5.3%	\$0	0.0%	2.7%	0	0.0%	5.0%	\$0	0.0%	2.4%
	Middle	0	0.0%	\$0	0.0%	34.0%	0	0.0%	35.7%	\$0	0.0%	29.0%	0	0.0%	34.0%	\$0	0.0%	26.4%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	58.1%	\$0	0.0%	67.8%	0	0.0%	60.3%	\$0	0.0%	70.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	4.1%	\$0	0.0%	1.9%	0	0.0%	4.1%	\$0	0.0%	1.8%
	Middle	0	0.0%	\$0	0.0%	34.0%	0	0.0%	27.2%	\$0	0.0%	21.5%	0	0.0%	27.7%	\$0	0.0%	21.4%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	68.1%	\$0	0.0%	76.2%	0	0.0%	67.6%	\$0	0.0%	76.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	2.9%	\$0	0.0%	1.2%	0	0.0%	1.5%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	14.3%	\$0	0.0%	6.6%	0	0.0%	12.3%	\$0	0.0%	4.0%
	Middle	0	0.0%	\$0	0.0%	34.0%	0	0.0%	39.0%	\$0	0.0%	28.2%	0	0.0%	34.1%	\$0	0.0%	23.1%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	43.7%	\$0	0.0%	64.0%	0	0.0%	52.1%	\$0	0.0%	72.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	15.2%	0	0.0%	2.6%	\$0	0.0%	0.0%	0	0.0%	14.0%	\$0	0.0%	3.9%
	Moderate	0	0.0%	\$0	0.0%	22.7%	0	0.0%	23.7%	\$0	0.0%	22.1%	0	0.0%	31.6%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	29.9%	0	0.0%	42.1%	\$0	0.0%	36.4%	0	0.0%	36.8%	\$0	0.0%	50.5%
	Upper	0	0.0%	\$0	0.0%	32.3%	0	0.0%	31.6%	\$0	0.0%	41.5%	0	0.0%	17.5%	\$0	0.0%	36.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	0.7%	\$0	0.0%	0.4%	0	0.0%	0.7%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	4.8%	\$0	0.0%	3.1%	0	0.0%	4.8%	\$0	0.0%	2.3%
	Middle	0	0.0%	\$0	0.0%	34.0%	0	0.0%	30.6%	\$0	0.0%	24.7%	0	0.0%	30.5%	\$0	0.0%	24.3%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	63.8%	\$0	0.0%	71.8%	0	0.0%	64.0%	\$0	0.0%	72.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Although HMDA lending in low- and moderate-income tracts in the assessment area was limited as evidenced by the aggregate data, some lending opportunity was available; 3.0 percent and 19.0 percent of the owner-occupied housing units are located in low- and moderate-income tracts, respectively.

Several performance context factors exist that may help explain the bank's HMDA lending performance, such as weak general economic conditions in the assessment area, the bank's limited presence, focus on commercial lending, and competition. Based on a review of demographic information and the aggregate lenders' performance, the bank's geographic distribution of HMDA lending in the Birmingham assessment area is considered poor.

Consumer Lending

The following table shows the geographic distribution of the bank’s consumer loans; selected demographic information about the census tracts is included as a basis for comparison.

Geographic Distribution of Consumer Loans

Assessment Area: AL Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Bank				Demographics
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	6.5%
Moderate	3	75.0%	\$35	97.1%	22.4%
Middle	0	0.0%	\$0	0.0%	32.7%
Upper	1	25.0%	\$1	2.9%	38.4%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$37</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Although consumer lending volume is low, 75.0 percent of the consumer loans sampled were originated in moderate-income tracts, which is greater than the percentage of households in low-income census tracts in the area at 22.4 percent. This level of consumer lending in moderate-income tracts shows the bank’s willingness to serve the credit needs in the moderate-income tracts in the Birmingham assessment area. Based on performance context factors noted previously, the bank’s consumer lending reflects reasonable geographic distribution in the Birmingham assessment area.

Commercial Lending

The following table shows the geographic distribution of commercial loans as a percentage of the total number of loans by type within its Birmingham assessment area.

Geographic Distribution of Commercial Loans

Assessment Area: AL Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	2	20.0%	\$165	7.3%	9.2%
Moderate	4	40.0%	\$619	27.3%	13.1%
Middle	1	10.0%	\$11	0.5%	28.9%
Upper	3	30.0%	\$1,471	64.9%	48.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$2,266</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Although commercial lending volume is low, 20.0 percent of commercial loans sampled were in low-income tracts, which is significantly higher than the percentage of small businesses located in low-income tracts at 9.2 percent. Of the loans sampled, 40.0 percent were originated in moderate-income tracts and was also significantly higher than the percentage of small business located in these tracts at 13.1 percent. The bank's commercial lending performance in both low- and moderate-income tracts was much higher than comparable demographic performance. Based on these factors, the bank's commercial lending reflects reasonable dispersion among different census tract income levels in the Birmingham assessment area.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

Based on the following analysis, the overall distribution of the bank's HMDA, consumer, and commercial loans by borrower income and business revenue reflects reasonable dispersion in the bank's assessment area. Performance context issues, such as the bank's small market presence in the competitive banking environment of Birmingham, were also taken into consideration.

Residential Real Estate (HMDA) Lending

The following table shows the distribution of the bank's HMDA-reportable loans by the income level of the borrowers.

Borrower Distribution of HMDA Loans
Assessment Area: AL Birmingham

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2010					2011						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	10.8%	\$0	0.0%	5.6%	0	0.0%	9.1%	\$0	0.0%	4.5%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	26.2%	\$0	0.0%	19.5%	0	0.0%	21.5%	\$0	0.0%	15.2%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	21.9%	\$0	0.0%	20.8%	0	0.0%	20.2%	\$0	0.0%	18.7%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	29.8%	\$0	0.0%	43.2%	0	0.0%	31.6%	\$0	0.0%	45.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.2%	\$0	0.0%	10.9%	0	0.0%	17.6%	\$0	0.0%	15.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	4.5%	\$0	0.0%	2.3%	0	0.0%	4.5%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	13.2%	\$0	0.0%	8.6%	0	0.0%	11.8%	\$0	0.0%	7.4%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	20.0%	\$0	0.0%	16.4%	0	0.0%	17.7%	\$0	0.0%	14.0%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	45.9%	\$0	0.0%	57.7%	0	0.0%	43.9%	\$0	0.0%	56.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.3%	\$0	0.0%	15.0%	0	0.0%	22.1%	\$0	0.0%	20.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	15.0%	\$0	0.0%	5.7%	0	0.0%	11.4%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	23.2%	\$0	0.0%	16.6%	0	0.0%	20.1%	\$0	0.0%	12.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	22.2%	\$0	0.0%	19.3%	0	0.0%	22.8%	\$0	0.0%	21.6%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	33.8%	\$0	0.0%	51.5%	0	0.0%	38.5%	\$0	0.0%	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.8%	\$0	0.0%	6.9%	0	0.0%	7.1%	\$0	0.0%	7.7%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	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%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	7.1%	\$0	0.0%	3.3%	0	0.0%	6.6%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	18.2%	\$0	0.0%	12.0%	0	0.0%	16.1%	\$0	0.0%	10.3%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	20.8%	\$0	0.0%	17.2%	0	0.0%	18.9%	\$0	0.0%	15.5%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	39.7%	\$0	0.0%	50.4%	0	0.0%	38.6%	\$0	0.0%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.3%	\$0	0.0%	17.2%	0	0.0%	19.9%	\$0	0.0%	20.7%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

Citizens Trust Bank did not originate any HMDA loans in the Birmingham assessment area during the review period. While factors exist that may challenge HMDA loan originations to low- and moderate-income borrowers in this assessment area, aggregate lenders were able to lend to this segment of the market, particularly to moderate-income borrowers; therefore, opportunities do exist. Based on a review of demographic and peer data, the bank's distribution of HMDA lending by borrower income is considered poor.

Consumer Lending

The following table shows the distribution of the bank's consumer loans by the income level of the borrowers.

Borrower Distribution of Consumer Loans

Assessment Area: AL Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Bank				Demographics Households by Household Incomes
	Count		Dollar		
#	%	\$ (000s)	\$ %	%	
Low	3	75.0%	\$28	77.8%	23.4%
Moderate	1	25.0%	\$8	22.2%	15.0%
Middle	0	0.0%	\$0	0.0%	17.9%
Upper	0	0.0%	\$0	0.0%	43.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$37</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Although lending volume was low, all the consumer loans sampled in the Birmingham assessment area were originated to low- and moderate-income borrowers. Based on its consumer lending performance in comparison to demographic information, the bank exhibits a reasonable distribution of loans to borrowers of different income levels.

Commercial Lending

The following table shows, by loan size, the number and dollar volume of commercial loans sampled during the review period.

Commercial Loans by Business Revenue & Loan Size

Assessment Area: AL Birmingham

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010, 2011				
		Bank				Total Businesses
		Count		\$ (000s)		
#	%	\$	%	%		
BUSINESS REVENUE	\$1million or Less	7	70.0%	\$1,205	53.2%	90.0%
	Over \$1 Million	3	30.0%	\$1,061	46.8%	6.5%
	<i>Total Rev. available</i>	10	100.0%	\$2,266	100.0%	96.5%
	Rev. Not Known	0	0.0%	\$0	0.0%	3.5%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$2,266</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	6	60.0%	\$186	8.2%	
	\$100,001 - \$250,000	1	10.0%	\$122	5.4%	
	\$250,001 - \$1 Million	3	30.0%	\$1,958	86.4%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$2,266</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	5	71.4%	\$86	7.2%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,001 - \$1 Million	2	28.6%	\$1,119	92.8%	
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$1,205</i>	<i>100.0%</i>	

Originations & Purchases

Of the 10 loans sampled, 70.0 percent were extended to businesses with gross annual revenues of \$1 million or less, which is below the percentage of businesses in the assessment area with revenues of \$1 million or less, at 90.0 percent. In addition, 71.4 percent of the loans to businesses with revenues of \$1 million or less were in loan amounts of \$100,000 or less. This shows the bank’s willingness to lend small dollar amounts to small businesses. Based on the bank’s performance in comparison to the demographics, the distribution of small business loans to businesses of different sizes is considered reasonable in the Birmingham assessment area.

COMMUNITY DEVELOPMENT TEST

Overview

Citizens Trust Bank’s community development performance demonstrates excellent responsiveness to the community development needs of the Birmingham assessment area through community development loans, qualified investments and donations, and community development services, given the institution’s capacity and the need and availability of such opportunities for community development in the assessment area. Community development activities from January 25, 2011 to January 14, 2013 were considered in this analysis.

Citizens Trust Bank originated six community development loans in the Birmingham assessment area totaling approximately \$8 million, which are listed in the table below.

Citizens Trust Bank Community Development Loans - Birmingham Assessment Area		
Purpose	# of Loans	\$ Amount
Revitalization and Stabilization	3	\$4,236,513
Affordable Housing	1	\$3,333,945
Economic Development	2	\$414,000
Total	6	\$7,984,458

Bank employees used their financial expertise to provide services that benefit low- and moderate-income residents and small businesses in the Birmingham assessment area. Community development services were provided to 4 organizations and included approximately 82 hours. The majority of services were to provide technical assistance on financial matters to government entities or non-profit organizations.

**METROPOLITAN AREA – Tuscaloosa, Alabama
LIMITED-SCOPE REVIEW**

The Tuscaloosa assessment area is a portion of the Tuscaloosa, Alabama MSA and is composed of Greene and Hale counties. The Tuscaloosa assessment area was reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the bank’s CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed the bank’s CRA performance in this assessment area is consistent with the areas that received a full-scope review. Please refer to the tables in Appendix C for additional information regarding the area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TUSCALOOSA ASSESSMENT AREA

The bank has a limited presence in the Tuscaloosa assessment area with one branch and one branch-based ATM. According to the June 30, 2012 FDIC Summary of Deposits Report, the bank ranks 5th in deposit market share out of five banks that operate in the area, with its competition coming from four local financial institutions. The Tuscaloosa assessment area consists of nine census tracts; seven (77.8 percent) are moderate-income tracts and two (22.2 percent) are middle-income tracts. There are no low-income tracts in the assessment area. The Census Bureau website provides QuickFacts for Greene County, Alabama²⁷, which reflects that the percentage of persons below poverty level from 2007 to 2011 was 31.7 percent compared to the state of Alabama at 17.6 percent. In addition, Greene County has been designated as a "persistent poverty" county by the United States Department of Agriculture’s (USDA) Economic Research Service (ERS). As mentioned previously, the bank decided to reinstate the Community Relief Fund loan product in 2011 to help meet the credit needs of low- and moderate-income individual in the assessment area.

CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS IN TUSCALOOSA, AL

The bank did not originate any HMDA loans or commercial loans in this assessment area during the review period. However, the bank originated consumer loans, which were all Community Relief Loans. The limited lending in this assessment area can be explained by the bank’s small presence in the assessment area, local competition, and availability of opportunities in the area. The bank’s lending performance in the area is consistent with the bank’s overall performance.

The bank originated \$323,000 in community development loans and \$76,048 in a prior period community development investment to a minority-owned Community Development Financial Institution in the assessment area. Bank employees also provided financial expertise to four different organizations that targeted low- and moderate-income individuals and small businesses in the assessment area. The following table compares conclusions regarding the bank’s performance in the Tuscaloosa assessment area to the bank’s overall performance in Alabama.

Performance in the Limited-scope Review Metropolitan Assessment Areas		
Assessment Area	Lending Test	Community Development Test
Tuscaloosa	Consistent	Consistent

²⁷ <http://quickfacts.census.gov/qfd/states/01/01063>

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
January 1, 2010 to December 31, 2011 – Lending Test			
January 25, 2011 to January 14, 2013 – Community Development Test			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Citizens Trust Bank – Atlanta, Georgia		HMDA Loans Commercial Loans Consumer Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Atlanta, Georgia	Full-Scope Review	Westside Branch	NA
Birmingham, Alabama	Full-Scope Review	Birmingham Branch	NA
Columbus, Georgia	Limited-Scope Review	NA	NA
Tuscaloosa, Alabama	Limited-Scope Review	NA	NA

**APPENDIX B – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Columbus, GA-AL)**

Combined Demographics Report

Assessment Area: GA-AL Columbus

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	14.7	4,891	8.0	2,468	50.5	13,981	22.8
Moderate-income	19	27.9	15,353	25.0	3,017	19.7	11,080	18.1
Middle-income	21	30.9	23,695	38.6	2,357	9.9	12,570	20.5
Upper-income	16	23.5	17,386	28.4	528	3.0	23,694	38.6
Unknown-income	2	2.9	0	0.0	0	0.0	0	0.0
Total Assessment Area	68	100.0	61,325	100.0	8,370	13.6	61,325	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	9,985	1,573	3.0	15.8	6,724	67.3	1,688	16.9
Moderate-income	27,339	10,720	20.7	39.2	12,710	46.5	3,909	14.3
Middle-income	35,964	22,023	42.6	61.2	11,382	31.6	2,559	7.1
Upper-income	25,435	17,379	33.6	68.3	6,835	26.9	1,221	4.8
Unknown-income	290	5	0.0	1.7	209	72.1	76	26.2
Total Assessment Area	99,013	51,700	100.0	52.2	37,860	38.2	9,453	9.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,164	9.2	1,022	8.9	87	12.8	55	11.6
Moderate-income	2,333	18.4	2,137	18.5	120	17.6	76	16.1
Middle-income	4,225	33.3	3,878	33.6	199	29.2	148	31.3
Upper-income	4,526	35.7	4,135	35.9	220	32.3	171	36.2
Unknown-income	438	3.5	360	3.1	55	8.1	23	4.9
Total Assessment Area	12,686	100.0	11,532	100.0	681	100.0	473	100.0
Percentage of Total Businesses:				90.9		5.4		3.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	2.7	3	2.8	0	0.0	0	0.0
Moderate-income	38	34.2	37	33.9	1	50.0	0	0.0
Middle-income	30	27.0	29	26.6	1	50.0	0	0.0
Upper-income	39	35.1	39	35.8	0	0.0	0	0.0
Unknown-income	1	0.9	1	0.9	0	0.0	0	0.0
Total Assessment Area	111	100.0	109	100.0	2	100.0	0	.0
Percentage of Total Farms:				98.2		1.8		.0

Based on 2011 D&B information according to 2000 Census Boundaries.

**APPENDIX B – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Columbus, GA-AL) – Continued**

Geographic Distribution of HMDA Loans

Assessment Area: GA-AL Columbus

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2010					2011						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	1.2%	\$0	0.0%	0.7%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	20.7%	0	0.0%	11.2%	\$0	0.0%	7.6%	0	0.0%	10.2%	\$0	0.0%	7.1%
	Middle	2	100.0%	\$95	100.0%	42.6%	0	0.0%	50.1%	\$0	0.0%	46.7%	2	100.0%	49.3%	\$95	100.0%	46.1%
	Upper	0	0.0%	\$0	0.0%	33.6%	0	0.0%	37.1%	\$0	0.0%	44.5%	0	0.0%	39.4%	\$0	0.0%	45.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.6%	0	0.0%	0.5%	\$0	0.0%	0.7%
	Total	2	100.0%	\$95	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$95	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	1.5%	\$0	0.0%	0.8%	0	0.0%	1.0%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	20.7%	0	0.0%	8.9%	\$0	0.0%	6.1%	0	0.0%	9.1%	\$0	0.0%	5.9%
	Middle	0	0.0%	\$0	0.0%	42.6%	0	0.0%	32.9%	\$0	0.0%	26.3%	0	0.0%	32.7%	\$0	0.0%	26.2%
	Upper	0	0.0%	\$0	0.0%	33.6%	0	0.0%	56.6%	\$0	0.0%	66.6%	0	0.0%	57.1%	\$0	0.0%	66.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	3.3%	\$0	0.0%	1.8%	0	0.0%	5.0%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	20.7%	0	0.0%	15.8%	\$0	0.0%	7.2%	0	0.0%	21.8%	\$0	0.0%	18.7%
	Middle	0	0.0%	\$0	0.0%	42.6%	0	0.0%	43.4%	\$0	0.0%	34.2%	0	0.0%	43.6%	\$0	0.0%	35.8%
	Upper	0	0.0%	\$0	0.0%	33.6%	0	0.0%	37.5%	\$0	0.0%	56.7%	0	0.0%	29.6%	\$0	0.0%	42.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	25.4%	0	0.0%	15.8%	\$0	0.0%	17.7%	0	0.0%	4.8%	\$0	0.0%	9.5%
	Moderate	0	0.0%	\$0	0.0%	26.0%	0	0.0%	15.8%	\$0	0.0%	6.1%	0	0.0%	23.8%	\$0	0.0%	29.2%
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	36.8%	\$0	0.0%	35.8%	0	0.0%	28.6%	\$0	0.0%	14.8%
	Upper	0	0.0%	\$0	0.0%	24.4%	0	0.0%	31.6%	\$0	0.0%	40.3%	0	0.0%	38.1%	\$0	0.0%	46.1%
	Unknown	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.8%	\$0	0.0%	0.5%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	1.5%	\$0	0.0%	2.1%	0	0.0%	1.0%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	20.7%	0	0.0%	10.2%	\$0	0.0%	6.7%	0	0.0%	10.2%	\$0	0.0%	8.7%
	Middle	2	100.0%	\$95	100.0%	42.6%	0	0.0%	40.8%	\$0	0.0%	35.8%	2	100.0%	41.1%	\$95	100.0%	34.3%
	Upper	0	0.0%	\$0	0.0%	33.6%	0	0.0%	47.2%	\$0	0.0%	55.1%	0	0.0%	47.4%	\$0	0.0%	55.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.6%
	Total	2	100.0%	\$95	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$95	100.0%	100.0%

Originations & Purchases

**APPENDIX B – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Columbus, GA-AL) – Continued**

Geographic Distribution of Consumer Loans

Assessment Area: GA-AL Columbus

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Bank				Demographics
	Count		Dollar		Households
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	9.3%
Moderate	1	14.3%	\$18	9.9%	26.2%
Middle	3	42.9%	\$27	14.6%	37.3%
Upper	3	42.9%	\$138	75.5%	27.0%
Unknown	0	0.0%	\$0	0.0%	0.2%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$183</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Commercial Loans

Assessment Area: GA-AL Columbus

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Bank				Small
	Count		Dollar		Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	8.9%
Moderate	7	63.6%	\$7,000	81.3%	18.5%
Middle	1	9.1%	\$55	0.6%	33.6%
Upper	3	27.3%	\$1,558	18.1%	35.9%
Unknown	0	0.0%	\$0	0.0%	3.1%
Tr Unknown	0	0.0%	\$0	0.0%	3.1%
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$8,612</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

**APPENDIX B – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Columbus, GA-AL) – Continued**

Borrower Distribution of HMDA Loans

Assessment Area: GA-AL Columbus

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2010				2011							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	7.8%	\$0	0.0%	3.6%	0	0.0%	5.0%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	18.8%	\$0	0.0%	12.6%	0	0.0%	15.2%	\$0	0.0%	10.1%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	25.6%	\$0	0.0%	24.8%	0	0.0%	24.9%	\$0	0.0%	23.0%
	Upper	2	100.0%	\$95	100.0%	38.6%	0	0.0%	34.8%	\$0	0.0%	46.7%	2	100.0%	40.3%	\$95	100.0%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.9%	\$0	0.0%	12.3%	0	0.0%	14.6%	\$0	0.0%	12.5%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	4.1%	\$0	0.0%	2.0%	0	0.0%	3.0%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	11.0%	\$0	0.0%	7.2%	0	0.0%	8.1%	\$0	0.0%	5.1%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	17.9%	\$0	0.0%	14.3%	0	0.0%	14.7%	\$0	0.0%	11.0%
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	39.4%	\$0	0.0%	48.6%	0	0.0%	38.0%	\$0	0.0%	46.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	27.6%	\$0	0.0%	27.9%	0	0.0%	36.2%	\$0	0.0%	36.2%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	8.9%	\$0	0.0%	3.2%	0	0.0%	11.8%	\$0	0.0%	7.4%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	21.4%	\$0	0.0%	17.2%	0	0.0%	17.1%	\$0	0.0%	11.1%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	30.3%	\$0	0.0%	21.3%	0	0.0%	25.7%	\$0	0.0%	20.2%
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	38.5%	\$0	0.0%	54.3%	0	0.0%	43.9%	\$0	0.0%	56.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	4.1%	0	0.0%	1.4%	\$0	0.0%	4.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	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%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	5.9%	\$0	0.0%	2.5%	0	0.0%	4.3%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	14.8%	\$0	0.0%	9.0%	0	0.0%	11.9%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	21.7%	\$0	0.0%	17.6%	0	0.0%	20.0%	\$0	0.0%	15.5%
	Upper	2	100.0%	\$95	100.0%	38.6%	0	0.0%	37.3%	\$0	0.0%	43.9%	2	100.0%	39.2%	\$95	100.0%	44.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.3%	\$0	0.0%	26.9%	0	0.0%	24.6%	\$0	0.0%	31.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

**APPENDIX B – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Columbus, GA-AL) – Continued**

Borrower Distribution of Consumer Loans

Assessment Area: GA-AL Columbus

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Bank				Demographics Households by Household Incomes %
	Count		Dollar		
#	%	\$ (000s)	\$ %		
Low	0	0.0%	\$0	0.0%	25.2%
Moderate	4	57.1%	\$45	24.5%	16.3%
Middle	1	14.3%	\$10	5.2%	18.3%
Upper	2	28.6%	\$129	70.3%	40.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$183</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Commercial Loans by Business Revenue & Loan Size

Assessment Area: GA-AL Columbus

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2010, 2011				
		Bank				Total Businesses %
		Count		\$ (000s)		
		#	%	\$	%	
BUSINESS REVENUE	\$1million or Less	2	18.2%	\$109	1.3%	90.9%
	Over \$1 Million	9	81.8%	\$8,504	98.7%	5.4%
	<i>Total Rev. available</i>	11	100.0%	\$8,612	100.0%	96.3%
	Rev. Not Known	0	0.0%	\$0	0.0%	3.7%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$8,612</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	4	36.4%	\$127	1.5%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,001 - \$1 Million	5	45.5%	\$3,284	38.1%	
	Over \$1 Million	2	18.2%	\$5,201	60.4%	
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$8,612</i>	<i>100.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	\$109	100.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$109</i>	<i>100.0%</i>	

Originations & Purchases

**APPENDIX C – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Tuscaloosa, AL)**

Combined Demographics Report

Assessment Area: AL Tuscaloosa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,772	37.8
Moderate-income	7	77.8	5,799	79.0	1,636	28.2	1,398	19.0
Middle-income	2	22.2	1,540	21.0	198	12.9	1,278	17.4
Upper-income	0	0.0	0	0.0	0	0.0	1,891	25.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	9	100.0	7,339	100.0	1,834	25.0	7,339	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	10,557	6,425	79.1	60.9	1,904	18.0	2,228	21.1
Middle-income	2,316	1,693	20.9	73.1	324	14.0	299	12.9
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	12,873	8,118	100.0	63.1	2,228	17.3	2,527	19.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	882	79.2	791	78.8	25	78.1	66	85.7
Middle-income	231	20.8	213	21.2	7	21.9	11	14.3
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,113	100.0	1,004	100.0	32	100.0	77	100.0
Percentage of Total Businesses:			90.2		2.9		6.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	111	89.5	109	89.3	1	100.0	1	100.0
Middle-income	13	10.5	13	10.7	0	0.0	0	0.0
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	124	100.0	122	100.0	1	100.0	1	100.0
Percentage of Total Farms:			98.4		.8		.8	

Based on 2011 D&B information according to 2000 Census Boundaries.

**APPENDIX C – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Tuscaloosa, AL) – Continued**

**Geographic Distribution of HMDA Loans
Assessment Area: AL Tuscaloosa**

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2010			2011								
		Count		Dollar			Bank #	Agg %	Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%			\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	79.1%	0	0.0%	47.1%	\$0	0.0%	38.9%	0	0.0%	52.2%	\$0	0.0%	44.7%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	52.4%	\$0	0.0%	60.9%	0	0.0%	47.2%	\$0	0.0%	54.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	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%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	79.1%	0	0.0%	64.8%	\$0	0.0%	60.0%	0	0.0%	62.0%	\$0	0.0%	56.1%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	35.2%	\$0	0.0%	40.0%	0	0.0%	37.7%	\$0	0.0%	43.4%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.4%	\$0	0.0%	0.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	79.1%	0	0.0%	78.8%	\$0	0.0%	73.4%	0	0.0%	95.7%	\$0	0.0%	90.3%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	21.2%	\$0	0.0%	26.6%	0	0.0%	4.3%	\$0	0.0%	9.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	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%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	91.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	8.2%	0	0.0%	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%	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%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	79.1%	0	0.0%	58.9%	\$0	0.0%	51.7%	0	0.0%	68.1%	\$0	0.0%	53.5%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	40.9%	\$0	0.0%	48.2%	0	0.0%	31.6%	\$0	0.0%	46.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	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%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

**APPENDIX C – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Tuscaloosa, AL) – Continued**

Geographic Distribution of Consumer Loans

Assessment Area: AL Tuscaloosa

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Count		Dollar		Demographics
	#	%	\$ (000s)	\$ %	Households %
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	10	100.0%	\$40	100.0%	80.2%
Middle	0	0.0%	\$0	0.0%	19.8%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$40</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Geographic Distribution of Commercial Loans

Assessment Area: AL Tuscaloosa

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Count		Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	78.8%
Middle	0	0.0%	\$0	0.0%	21.2%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

**APPENDIX C – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Tuscaloosa, AL) – Continued**

Borrower Distribution of HMDA Loans

Assessment Area: AL Tuscaloosa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2010, 2011					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2010					2011						
		Count		Dollar			Bank		Agg			Bank		Agg				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	37.8%	0	0.0%	19.4%	\$0	0.0%	10.8%	0	0.0%	11.2%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	27.2%	\$0	0.0%	22.4%	0	0.0%	21.9%	\$0	0.0%	15.8%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	20.9%	\$0	0.0%	24.0%	0	0.0%	25.3%	\$0	0.0%	28.0%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	28.2%	\$0	0.0%	39.5%	0	0.0%	26.4%	\$0	0.0%	34.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	3.2%	0	0.0%	15.2%	\$0	0.0%	17.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	37.8%	0	0.0%	12.8%	\$0	0.0%	4.6%	0	0.0%	9.9%	\$0	0.0%	3.8%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	17.4%	\$0	0.0%	12.0%	0	0.0%	13.0%	\$0	0.0%	9.2%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	21.1%	\$0	0.0%	18.6%	0	0.0%	24.6%	\$0	0.0%	24.5%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	38.2%	\$0	0.0%	49.8%	0	0.0%	34.9%	\$0	0.0%	39.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.5%	\$0	0.0%	15.0%	0	0.0%	17.6%	\$0	0.0%	22.6%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	37.8%	0	0.0%	33.3%	\$0	0.0%	20.3%	0	0.0%	13.4%	\$0	0.0%	7.6%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	24.2%	\$0	0.0%	20.0%	0	0.0%	30.5%	\$0	0.0%	21.6%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	24.2%	\$0	0.0%	33.9%	0	0.0%	28.7%	\$0	0.0%	28.7%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	18.2%	\$0	0.0%	25.7%	0	0.0%	27.4%	\$0	0.0%	42.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	37.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	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%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	37.8%	0	0.0%	16.6%	\$0	0.0%	7.3%	0	0.0%	11.2%	\$0	0.0%	3.8%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	21.5%	\$0	0.0%	16.3%	0	0.0%	20.1%	\$0	0.0%	12.2%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	21.2%	\$0	0.0%	20.9%	0	0.0%	25.9%	\$0	0.0%	26.0%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	33.1%	\$0	0.0%	45.4%	0	0.0%	30.5%	\$0	0.0%	38.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.6%	\$0	0.0%	10.1%	0	0.0%	12.3%	\$0	0.0%	19.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

**APPENDIX C – DEMOGRAPHIC, GEOGRAPHIC, AND BORROWER DISTRIBUTION TABLES
(Tuscaloosa, AL) – Continued**

Borrower Distribution of Consumer Loans

Assessment Area: AL Tuscaloosa

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2010, 2011				
	Bank				Demographics Households by Household Incomes %
	Count		Dollar		
#	%	\$ (000s)	\$ %		
Low	6	60.0%	\$9	21.8%	38.3%
Moderate	0	0.0%	\$0	0.0%	15.7%
Middle	2	20.0%	\$9	22.0%	16.4%
Upper	2	20.0%	\$22	56.2%	29.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$40</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Commercial Loans by Business Revenue & Loan Size

Assessment Area: AL Tuscaloosa

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2010, 2011				
		Bank				Total Businesses %
		Count		\$ (000s)		
#	%	\$	%			
BUSINESS REVENUE	\$1million or Less	0	0.0%	\$0	0.0%	90.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.9%
	<i>Total Rev. available</i>	0	0.0%	\$0	0.0%	93.1%
	Rev. Not Known	0	0.0%	\$0	0.0%	6.9%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	

Originations & Purchases

APPENDIX D – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM -	Automated Teller Machine
CDC -	Community Development Corporation
CDFI -	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
FFIEC -	Federal Financial Institutions Examination Council
HMDA -	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LMI -	Low- and Moderate-Income
LTD -	Loan-to-Deposit
LTV	Loan-to-Value Ratio
MD -	Metropolitan Division
MSA -	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS -	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention

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

APPENDIX D – DEFINITIONS AND GENERAL INFORMATION (Continued)

General Information

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

This document is an evaluation of the CRA performance of **Citizens Trust Bank** prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **January 14, 2013**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX E- GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

Effective January 19, 2010, the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation revised the definition of community development to include loans, investments, and services by financial institutions that-

- I. Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
- II. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
- III. Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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.

APPENDIX E – GLOSSARY (Continued)

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 multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of 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. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

APPENDIX E – GLOSSARY (Continued)

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.

Multi-family: Refers to a residential structure that contains five or more units.

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

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

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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