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**Comptroller of the Currency  
Administrator of National Banks**

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Jacksonville Duty Station  
8382 Baymeadows Road, Suite #1  
Jacksonville, FL 32256

**PUBLIC DISCLOSURE**

**January 30, 1997**

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

**Thomasville National Bank  
Charter Number 22883**

**301 North Broad Street  
Thomasville, Georgia 31729**

**Office of the Comptroller of the Currency**

**Southeastern District  
Marquis One Tower, Suite 600  
245 Peachtree Center Avenue, N.E.  
Atlanta, Georgia 30303**

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

## GENERAL INFORMATION

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

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Thomasville National Bank** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of January 30, 1997. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

**INSTITUTION'S CRA RATING:** This institution is rated **SATISFACTORY.**

The following factors provide support for Thomasville National Bank's rating:

- ▶ The loan-to-deposit ratio is competitive with that of other institutions and reflects the bank's capacity to make loans.
- ▶ A substantial majority of loan originations are within the bank's assessment area. The distribution of these loans within the bank's assessment area is reasonable.
- ▶ The bank's lending patterns demonstrate a reasonable amount of loan activity to borrowers from different income categories, including low- and moderate- income borrowers.

*The following table indicates the performance level of Thomasville National Bank with respect to each of the five performance criteria. The bank's level of performance under each of the criteria is indicated by the inclusion of an "X" in the appropriate column.*

SMALL INSTITUTION ASSESSMENT CRITERIA	<u>Thomasville National Bank.</u> PERFORMANCE LEVELS		
	Exceeds Standards for Satisfactory Performance	Meets Standards for Satisfactory Performance	Does not meet Standards for Satisfactory Performance
Loan to Deposit Ratio	X		
Lending in Assessment Area	X		
Lending to Borrowers of Different Incomes and to businesses of Different sizes		X	
Geographic Distribution of Loans		X	
Response to Complaints	No complaints have been received to date.		

## **DESCRIPTION OF INSTITUTION**

Thomasville National Bank is a \$44 million institution that opened for business on October 2, 1995. The bank is 100% owned by Thomasville Bancshares Incorporated. The main office is in Thomasville, Georgia. The mission of Thomasville National Bank is to operate a sound and profitable company while serving the banking needs of the Thomasville/Thomas County community. The composition of the bank's loan portfolio is as follows: commercial/commercial real estate loans (56%), residential real estate loans (31%) and consumer instalment loans (13%).

Thomasville National Bank offers a full range of banking products and services to meet the needs of its customers. While the bank currently has only one banking office, it is centrally located within Thomas County. The bank's location does not arbitrarily exclude any areas of the county from applying for credit. Thomasville National Bank faces strong competition from the presence of 3 state banks headquartered outside Thomas County, 3 branch offices of regional institutions, and 1 savings and loan.

## **DESCRIPTION OF THE THOMAS COUNTY ASSESSMENT AREA**

Thomasville National Bank's assessment area consists of Thomas County, Georgia, which includes the city of Thomasville, the town of Boston, as well as other small rural communities. The 1990 U.S. Census has segmented Thomas County into 11 Block Numbering Areas (BNAs). Of these 11 areas, 4 are designated as moderate- income and none are designated as low- income. The 1990 U.S. Census family median income is \$26,691. The 1996 NonMetropolitan portion of the median family income for the county is \$32,500.

As of the 1990 census, the population of Thomas County is 38,986. Major employers in Thomas County include The Archbold Hospital, The Southeastern Hospital, Flowers Industries and Bakery, and Davis Water and Waste. At less than 4%, unemployment in the area is low.

We performed one community contact during this examination. The individual contacted was a local civic leader. This individual stated that examples of credit needs in the assessment area are affordable housing and loans to foster inner city youth programs. Additionally, information from a community contact made by the Federal Deposit Insurance Corporation was used in analyzing the assessment area's credit needs.

## **DISCUSSION OF INSTITUTION'S PERFORMANCE CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

Since the bank opened, the loan-to-deposit ratio increased from 65% on December 31, 1995 to 87% on December 31, 1996 and during this time it averaged 82%. Having obtained such a competitive level of loan activity in such a relatively short time demonstrates both the bank's willingness and ability to lend. The bank's loan-to-deposit ratio exceeds the average of 78% attained by similar institutions in Thomas County.

A substantial majority of Thomasville National Bank's loans are within its assessment area. As of this review, 88% of all loans originated since the bank opened have been within Thomas County. Our sample of 20 residential loans supports this level of in-area lending, all of which were within the bank's assessment area. Additionally, the bank is involved in funding projects for the Youth Build of Thomasville that funds house building for low income borrowers.

The 11 BNAs within Thomas County all reflect a satisfactory amount of lending activity with no areas containing a disproportionately low level of loans. We took a sample of 12 small dollar consumer loans to determine the distribution of loans to borrowers from different income categories. Five, or 41% of the loans, were to borrowers falling in the low- income category. The remaining loans were to borrowers designated either as moderate income or high income. These income designations are based on the NonMetropolitan portion of the 1996 Median Family Income of \$32,500. This distribution of loans reflects a reasonable penetration among individuals from different income levels. The bank also makes loans of various sizes to both large and small businesses.

To date, the bank has received no complaints concerning their performance under the CRA. A review of fair lending practices and policies did not reveal any evidence of disparate treatment. Adequate policies and procedures are in place to ensure compliance with fair lending laws and regulations.