



PUBLIC DISCLOSURE

July 8, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

RBC- Georgia
Charter Number: 23416

8081 Arco Corporate Drive
Raleigh, NC 27617

Office of the Comptroller of the Currency

International Banking Supervision
340 Madison Avenue, 9th floor
New York, New York 10173

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, and should not 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.

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General Information and Overall CRA Rating

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 (LMI) neighborhoods, consistent with the 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 **RBC Bank-Georgia (RBCG)** issued by the OCC, the institution's supervisory agency, for the evaluation period starting January 1, 2012 through June 30, 2013. 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 table indicates the performance level of **RBC Bank-Georgia (RBCG)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	RBC- GA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The bank’s geographic distribution of loans reflects good penetration throughout the assessment area (AA).
- The bank’s record of lending to borrowers of different incomes was good.
- The bank’s level of qualified investments was good in relationship to the bank’s financial resources and community development opportunities. The qualified investments exhibit an adequate level of responsiveness to community needs.
- The bank’s level of community development services exhibit an adequate level of responsiveness to community needs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives 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 Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., 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 MA/assessment area.

Median Family Income (MFI): The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state 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 secured by either nonfarm or nonresidential real estate or are classified as commercial and industrial 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.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

RBC Bank- Georgia ("RBCG" or "the bank") is a bank headquartered in Atlanta, Georgia, with operations located in Raleigh, NC. RBCG is a \$2.9 billion financial institution restructured in 2012, from a limited purpose credit card operation, to provide cross-border support to Royal Bank of Canada (RBC) Canadian clients who have banking needs in the United States (U.S.) RBCG delivers retail products and services to its clients through an integrated online banking platform and a centralized contact center. RBCG is a wholly owned subsidiary of RBC. RBC is an \$868 billion (Canadian dollars) financial services company headquartered in Montreal, Quebec.

RBC and its subsidiaries operate under the master brand RBC. RBC is one of Canada's largest banks as measured by assets and market capitalization and one of the largest in the world based on market capitalization. RBC subsidiaries include RBCG, RBC Capital Markets and RBC Wealth Management U.S. RBC has offices in Canada, the United States and 49 other countries.

As of March 31, 2013, RBCG had assets totaling \$2.9 billion, deposits totaling \$2.6 billion and Tier One capital totaling \$212 million. RBCG's net loan and leases totaled \$449 million, representing 15.31% of total assets. RBCG's other assets included investments, which totaled \$2.4 billion. RBCG's loan portfolio is comprised primarily of purchased home mortgage (1-4 family) loans, which represented 84.88% of the portfolio. Consumer and non-farm loans comprise the remainder of RBCG's loan portfolio, representing 14.52% and .61% of the loan portfolio respectively.

RBCG is currently operating under a 3-year non-compete clause with PNC Financial Group Inc. (PNC). In the first quarter of 2012, RBC Bank (USA), formerly a state bank and RBCG's holding company, completed the sale of its non-cross border business, along with all of RBCG's non-cross border credit card assets to PNC. The purchase included control of RBC Bank (USA)'s branch and distribution network. In connection with the transaction, RBCG acquired the cross-border business of RBC Bank (USA), in order to restructure into a more full service bank. RBCG now offers the basic suite of retail services, including loan and deposit products', however, it no longer has access to the former RBC Bank (USA) branch network. The clause restricts RBCG from establishing additional physical locations in the service area for conducting branch banking business. Therefore, the bank does not operate a branch network in the U.S. As a result, RBCG implemented its new model to deliver banking services, with the use of a customer call center and small regional sales force to open deposit accounts and process loans applications, and an online banking platform to facilitate banking transactions.

Currently, only existing RBC customers may open a new banking relationship with RBCG. A condition of the non-compete clause is that RBCG may not actively market mortgage and deposit products to new clients within their assessment area. This impedes the bank's ability to originate loans or provide deposit services to new customers in the AA. However, the clause does not impede the bank from soliciting existing RBC customers, or purchasing home mortgages in the AA. There are no financial factors that impeded the bank's ability to meet the credit needs of its AA. This is the first CRA examination of the restructured institution and operation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, with the exception of Community Development loans, is January 1, 2012 through June 30, 2013. For Community Development loans and the Qualified Investment and Community Development Service Tests, the evaluation period is January 1, 2012 through July 8, 2013. Conclusions regarding the bank's lending performance are based on Home Mortgage Disclosure Act (HMDA) reportable loan data for loans purchased January 1, 2012 through June 30, 2013. RBCG's market share could not be determined as the most recent market share reports available are for 2011. The 2011 market share reports are based on 2000 census data and the evaluation period and the demographic data in the Performance Evaluation (PE) is based on the 2010 census data. The bank did not originate or purchase any home improvement or multi-family loans during the evaluation period. The lending tables for home improvement and multi-family lending are not included.

RBCG did not originate any small business, farm or multi-family loans during the evaluation period. The Lending Tables for small business, farm and multi-family loans are not included.

Data Integrity

Prior to this evaluation, the accuracy of the HMDA (residential mortgage) data was tested. This testing evidenced that the HMDA data was accurate and could be relied upon for the purposes of this evaluation. Examiners utilized the HMDA data from January 1, 2012 through June 30, 2013 to evaluate the bank's performance.

Loans, investments and services submitted by management for community development consideration were also reviewed to ensure they met the regulatory definition for community development.

Selection of Area(s) for Full-Scope Review

RBCG has designated only one delineated assessment area, the entire Atlanta-Sandy Springs- Marietta, GA MSA (Metropolitan Statistical Area). This AA received a full-scope review.

Ratings

RBCG's overall rating is based on the one delineated full-scope area in Georgia.

Other

One community contact was completed with a community development corporation organization in RBCG's AA. The contact identified banking alternatives for the high percentage of unbanked individuals as needs of the AA. The AA has a high volume of predatory lenders

such as check cashers and payday lenders. The contact stated that opportunities exist for bank involvement to partner with local community development organizations.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Atlanta-Sandy Springs- Marietta, GA MSA (Metropolitan Statistical Area) is good.

Lending Activity

Refer to Tables 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

RBCG's lending reflects a good responsiveness to credit needs in the Atlanta-Sandy Springs-Marietta: GA MSA AA. During the evaluation period, the bank purchased 172 home mortgage loans totaling \$28 million. The bank did not originate or purchase any home improvement or multi-family loans during the evaluation period.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans reflects a good penetration throughout the AA. The geographic distribution of home mortgage loans was good. There were no unexplained conspicuous gaps in the bank's lending pattern throughout its AA.

In evaluating the geographic distribution of home mortgage loans, we considered the limited number of owner occupied- units located in low-income geographies and the strong competition from competing financial institutions.

Home Mortgage Loans

Refer to Tables 2 and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan purchases.

Home Purchase Loans

RBCG geographic distribution of home purchase loans in the AA reflects adequate penetration throughout its AA. The percentage of home purchase loans among low-income geographies was poor compared to the percentage of owner-occupied housing units in low-income census tracts. The percentage of home purchase loans among moderate-income geographies was excellent compared to the percentage of owner-occupied housing units in moderate-income census tracts.

Home Refinance Loans

RBCG geographic distribution of home refinance loans in the AA reflects excellent penetration throughout its AA. The percentage of home purchase loans among low-income geographies was excellent compared to the percentage of owner-occupied housing units in low-income census tracts. The percentage of home refinance loans among moderate-income geographies was excellent compared to the percentage of owner-occupied housing units in moderate-income census tracts.

Lending Gap Analysis

We evaluated the lending distribution in this AA to determine if any unexplained conspicuous gaps existed. We used lending reports and maps to compare the geographies where loans were made to the geographies in the AA. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of RBCG's loans were made outside the AA. Overall, 88.62 percent of the home mortgage loans were originated outside of the bank's AA. The remainder was purchases within the AA. This analysis was performed on the entire bank rather than by AA.

The business strategy of the bank contributed to the low volume of home mortgage lending within the AA. Their strategy is to service RBC clients that reside throughout the United States. The non-compete clause also contributed to the bank's limited ability to originate home mortgage loans within the AA.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by borrower income level reflects good penetration among borrowers of different income levels. The distribution of home mortgage loans by borrower income level reflects good penetration.

In evaluating the borrower distribution of home mortgage loans, we considered the inflated level of unemployment. The AA unemployment rate is moderately high at 8.2 percent, which is near to the Georgia state average of 8.3 percent. Another mitigating factor is 9.61% of household living below the poverty level in the AA.

Home Mortgage Loans

Refer to Tables 8 and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan purchases.

Home Purchase Loans

Lending to moderate-income borrowers was excellent and exceeded the percentage of moderate-income families.

The distribution of home purchase loans to borrowers of different incomes was good compared to area demographics. Lending to low-income borrowers was poor. The percentage of loans to low-income borrowers was lower than the percentage of low-income families in the AA. The distribution of home purchase loans to moderate-income borrowers was excellent. The distribution of loans to moderate-income borrowers exceeded the percentage of moderate-income families.

Home Refinance Loans

The distribution of home refinance loans to borrowers of different incomes was excellent compared to the area demographics. Lending to low-income borrowers was excellent and exceeded the percentage of low-income families. Lending to moderate-income borrowers was excellent and exceeded the percentage of moderate-income families.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including any multifamily loans that also qualify as community development loans.

RBCG's community development lending was limited to one loan and considered to have a neutral impact on the lending test relative to the bank's performance in the AA. The loan was a \$100 thousand line of credit to an affordable housing community organization. The level of community development lending represents 0.472% of Tier-1 Capital.

Product Innovation and Flexibility

RBCG has not used any innovative or flexible loan products during the evaluation period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Atlanta- Marietta- Sandy Springs, GA MSA is rated High Satisfactory. Based on a full-scope review, the bank's performance was good.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

RBCG has a significant level of qualified investments. Moreover, the bank's qualified investments showed good responsiveness to community development needs. Refer to the Market Profile section for details on needs and opportunities. Qualified investments in the Atlanta-Sandy Springs- Marietta, GA AA totaled approximately \$12.2 million and represented approximately 5.76 percent of the bank's March 31, 2013 Tier One Capital. The bank's qualified investments are primarily comprised of affordable housing mortgage backed securities. The bank also made \$63 thousand in donations, which were qualified investments by definition.

Mortgage Back Securities- The bank purchased three affordable housing mortgage pools from three large financial institutions. The three pools are invested in 122 mortgage loans to low- and moderate- income borrowers within the Atlanta-Sandy Springs- Marietta AA. Prior period investments totaled \$2.01 million and current period investments totaled \$10.06 million. The prior period investments had a continuing impact on the community development needs in the AA.

The remaining qualified investments consisted of \$63 thousand in financial contributions to four community organizations involved in community development initiatives. The organizations provided affordable housing or services to low- and moderate-income individuals.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service test is rated "Low Satisfactory" Based on full-scope reviews, the bank's performance in the Atlanta- Sandy Springs- Marietta MSA is adequate in relationship to the bank's resources and community development opportunities.

Retail Banking Services

The bank does not have a retail banking service presence due to their business strategy as

referenced in the Description of Institution. Due to the mitigating factors described in the Description of Institution, more weight was placed on community development services. The retail banking service tables are not included.

Community Development Services

RBCG provided an adequate level of community development services in relationship to the bank's resources and local community development opportunities. The majority of RBCG's employees reside in the operations center in North Carolina, whereas a limited number of employees are located in their AA. Refer to the demographic profile section of the PE for additional information on the available community development opportunities in this AA.

Bank personnel served as Board members and home ownership counselors and provided technical assistance to two affordable housing community development organizations. These efforts had a positive impact on the bank's overall Service test rating.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes Community Development Loans): (01/01/2012 to 06/30/2013) Investment and Service Tests and Community Development Loans: (01/01/2012 to 07/08/2013)	
Financial Institution	Products Reviewed	
RBC Bank- GA	Residential Mortgage Loans Community Development Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NONE		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Atlanta- Sandy Springs- Marietta GA MSA #12060	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

Atlanta- Sandy Springs- Marietta, GA MSA #12060

Demographic Information for Full Scope Area: Atlanta- Sandy Springs- Marietta, GA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	946	9.83	25.05	34.78	29.81	0.53
Population by Geography	5,268,860	6.22	24.34	39.10	30.22	0.11
Owner-Occupied Housing by Geography	1,271,887	2.82	19.27	41.63	36.28	0.00
Business by Geography	719,883	4.95	22.06	36.41	36.51	0.07
Farms by Geography	11,940	3.14	21.41	44.30	31.15	0.00
Family Distribution by Income Level	1,277,286	22.01	17.22	19.60	41.17	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	501,096	10.73	34.50	38.92	15.85	0.00
Median Family Income Federal Financial Institutions Council (FFIEC) 2012 MFI Families Below Poverty Level		67,829 \$69,300 9.61%	Median Housing Value Unemployment Rate (2013 Bureau of Labor Statistics)		210,153 8.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2012 FFIEC MFI.

The Atlanta-Sandy Springs-Marietta MSA AA is comprised of all the counties within the entire MSA. RBCG does not operate branch offices within the AA due to its business strategy. The AA is located in the northwestern area of Georgia.

The largest employers in the AA are Delta Airlines, Wal-Mart Stores, Inc., Emory University/Emory Healthcare and DeKalb County Government and Schools.

Based on information from a community contact, the contact identified banking alternatives for the high percentage of unbanked individuals as needs of the AA. The AA has a high volume of predatory lenders such as check cashers and payday lenders. The contact stated that opportunities exist for bank involvement to partner with local community development organizations. There is a moderate level of opportunities available in the AA. Opportunities exist for affordable housing and alternative banking services for unbanked individuals.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community Development loans to statewide or region entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As ___12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding, tracked, and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												
Geography: ATLANTA-SANDY SPRINGS-MARIETTA, GA MSA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Atlanta-Sandy Springs-Marietta AA	100.00	172	28,079	0	0	0	0	1	100	173	28,179	0.00

* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to July 08, 2013.

*** Deposit Data as of July 24, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: ATLANTA-SANDY SPRINGS-MARIETTA, GA MSA												Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Atlanta-Sandy Springs-Marietta AA	66	100.00	2.82	1.52	19.27	19.70	41.63	25.76	36.28	53.03	0.00	0.00	0.00	0.00	0.00	

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: ATLANTA-SANDY SPRINGS-MARIETTA, GA MSA Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta-Sandy Springs-Marietta AA	106	100.00	2.82	3.77	19.27	26.42	41.63	29.25	36.28	40.57	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: ATLANTA-SANDY SPRINGS-MARIETTA, GA MSA Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013															
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta-Sandy Springs-Marietta AA	66	100.00	22.01	4.69	17.22	26.56	19.60	14.06	41.17	54.69	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: ATLANTA-SANDY SPRINGS-MARIETTA, GA MSA Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families ²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta-Sandy Springs-Marietta AA	106	100.00	22.01	26.67	17.22	50.48	19.60	6.67	41.17	16.19	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ATLANTA- SANDY SPRINGS-MARIETTA, GA MSA				Evaluation Period: JANUARY 1, 2012 TO JULY 8, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Atlanta-Sandy Springs-Marietta AA	2	2,091	9	10,121	11	12,212	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.