



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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## Public Disclosure

December 31, 2000

### Community Reinvestment Act Performance Evaluation

Wachovia Bank, N. A.  
Charter Number: 1559

100 North Main Street  
Winston-Salem, North Carolina 27150

Office of the Comptroller of the Currency  
Large Bank Supervision  
250 E Street, S.W.  
Washington, D.C. 20219

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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## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the U.S. Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

**Community Development (CD)** - Affordable 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.

**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.

**Footprint** - The geographic area, comprised of MSAs and/or other geographies, in which the bank operates branches.

**Full-Scope Review** - Performance under the lending, investment, and service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

**Geography** - A census tract or a block numbering area delineated by the U.S. Census Bureau 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multi-family (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**Limited-Scope 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, branch distribution).

**Low-Income** - Income levels that are less than 50 percent of the median family income.

**Median Family Income (MFI)** - The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Statistical Area (MSA)** - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80 percent and less than 120 percent of the MFI.

**Moderate-Income** - Income levels that are at least 50 percent and less than 80 percent of the MFI.

**Small Businesses** - Businesses with revenues of \$1 million or less.

**Small Farms** - Farms with revenues of \$1 million or less.

**Small Loans to Businesses** - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Loans to Farms** - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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**Tier 1 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** - Income levels that are 120 percent or more of the MFI.

## 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 evaluation, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of the **Wachovia Bank, N. A. (WBNA)** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **December 31, 2000**. The agency evaluates performance in assessment areas (AAs), as delineated by the institution, rather than individual branches. This AA evaluation may include visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated "**Outstanding.**" The following table indicates the performance level of **WBNA** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wachovia Bank, N. A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the investment and Service Tests when arriving at an overall rating.

## Summary of Performance

This CRA Public Evaluation affirms that WBNA is meeting the credit and community development (CD) needs of its communities including low- and moderate-income geographies. The "Outstanding" performance rating under the CRA is a result of the bank's ongoing commitment and activities to foster CD initiatives within its geographic footprint. (Refer to Definitions and Common Abbreviations for an explanation of the word "footprint").

The major factors that support the overall "Outstanding" CRA rating include:

- Good overall lending performance with particularly strong performance in the Charlotte-Gastonia-Rock Hill, Norfolk-Virginia Beach-Newport News, Richmond-Petersburg and Atlanta MSAs.
- Good overall farm lending performance.
- CD lending performance that enhanced the bank's overall Lending Test rating. The reported volume of CD loans totaled over \$2.0 billion during the three year evaluation period.
- An excellent volume of investments that aid in addressing affordable housing and economic development needs within the communities in which it operates. There is also a good responsiveness to community needs through investments promoting CD.
- Taking a leadership role in providing CD services. This is evident in all MSAs receiving a full-scope review.
- An overall good distribution of branch offices, particularly in low- and moderate-income geographies. The exception is in the Charlotte MSA where the branch distribution is excellent.
- Well-established programs that promote compliance with the substantive provisions of the anti-discrimination laws and regulations.

## Summary of Multi-state Metropolitan Area and State Ratings

<b>RATINGS: WACHOVIA BANK, N. A.</b>				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multi-state Rating
Wachovia Bank, N. A. (WBNA)	Outstanding	Outstanding	High Satisfactory	Outstanding
Multi-state Metropolitan Area or State:				
Augusta-Aiken, GA-SC	Outstanding	Outstanding	High Satisfactory	Outstanding
Charlotte-Gastonia-Rock Hill, NC-SC	Outstanding	Outstanding	Outstanding	Outstanding
State of Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Georgia	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of North Carolina	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of South Carolina	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Virginia	Outstanding	Outstanding	High Satisfactory	Outstanding

(\*) The Lending Test is weighted more heavily than the investment and Service Tests in the overall rating.

## **Description of Institution**

WBNA, headquartered in Winston-Salem, North Carolina, is among the largest interstate banking financial institutions in the U. S. The bank operates 667 branches in 61 markets, within its geographic footprint of the five southeastern states of Florida, Georgia, North Carolina, South Carolina and Virginia. Total assets exceed \$67 billion. Wachovia Mortgage Company (WMC) operated as a subsidiary of WBNA until June 2000 when it was dissolved and became the Mortgage Financial Services Division of WBNA.

WBNA is a subsidiary of Wachovia Corporation (WAC), an interstate financial holding company with dual headquarters in Atlanta, Georgia, and Winston-Salem, North Carolina. With total assets in excess of \$75 billion, the Corporation offers personal, corporate, trust and institutional financial services.

The WBNA states that its business strategy is to build long-term sustainable banking relationships. Its primary focus is business enterprises, including large, small and non-profit businesses. WBNA primary markets include areas where those relationships can produce significant impact for both the bank and the market place. For WBNA and its affiliates, the product offerings include a wide variety of credit and deposit services; insurance, investment and trust products; wealth management and information services. At the request of the bank, CD lending, investments, and services of affiliated companies were reviewed and considered in this evaluation.

WBNA did not face any legal, financial or other factors impeding its ability to help meet the credit needs within its geographic footprint. Its capital base is relatively strong. At June 30, 2000, Tier 1 Capital exceeded \$5 billion. The modest volume of foreign deposits did not impact the evaluation of the bank's performance. Net loans represented 75% of total assets. The loan portfolio distribution reflected: 41% commercial loans, 38% real estate loans and 21% consumer loans.

Since the last CRA evaluation, dated June 30, 1997, WAC acquired and/or merged with several financial-related companies, certain activities of which are considered in this evaluation. In March 1988, Central Fidelity National Bank merged with WBNA as a result of WAC's purchase of Central Fidelity Banks, Inc, in December 1997. In 1999, Interstate/Johnson Lane Corporation merged with Wachovia Capital Markets, Inc., and was subsequently renamed Wachovia Securities, Inc. This merger resulted from the WAC merger with Interstate/Johnson Lane, Inc. in April 1999. Bank of Canton, in Cherokee County, GA, merged with WBNA in May 2000, a result of WAC's February 2000 merger with B C Bankshares, Inc. The National Bank of Commerce merged with WBNA in October 2000; this occurred subsequent to the WAC acquisition of Commerce National Corporation in June 2000. While other mergers and acquisitions occurred during the evaluation period, the products and/or services provided by those

resulting companies were not considered during this CRA evaluation due to the relatively short period of time since their acquisition.

CD and qualified investment activities conducted by the WBNA affiliated companies were included in this evaluation. Wachovia Community Development Corporation (WCDC) originates CD loans, purchases low-income housing tax credits and provides extensive technical assistance to non-profit, for-profit, and community based affordable housing developers. WCDC's small but very experienced team of CD lenders uses innovative methods to solve complex loan and equity financing challenges. WBNA and WCDC, combined, are among the top East Coast CD lenders. When compared to other large reporting banking financial institutions, they rank among the top five CD lenders for each year during our evaluation period. Wachovia Foundation, Inc. provides grants and contributions to various community organizations. These activities supplement the bank's overall CRA activities. CD investments made by Wachovia Capital Markets, a division of Wachovia Securities Inc., were also considered in this evaluation.

WMC originated a large percentage of home purchase and home refinance loans during the evaluation period. The Company maintained specialized lenders in markets with the greatest lending opportunities. In line with the WBNA strategic direction, WMC generated high quality loans through internal delivery channels. WMC did not purchase home mortgage loans and did not acquire loans through mortgage brokers. To a large extent, these strategic decisions impacted the volume of home mortgage loans originated, particularly in markets where it competes with other financial and mortgage institutions that do engage in such practices.

WBNA maintains a staff of lenders specializing in farm credit. Farm loans are originated throughout the five state geographic footprint, but predominately within the rural areas in those states. Within the time period of this evaluation, WBNA originated 2,194 farm loans totaling over \$201 million.

The last CRA evaluation, dated June 30, 1997, rated the bank's performance under the CRA " Outstanding." At that time, banks were evaluated under 12 assessment factors. Effective July 1, 1997, the regulation was revised. For this evaluation, the bank's performance was evaluated under the revised regulation.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The time period for this evaluation is January 1, 1998, through December 31, 2000. Any CRA-related activities within that time period were considered in arriving at the overall CRA rating. With the exception of 1998 small business and small farm loan data, we evaluated home mortgage, small business and CD loans under the Lending Test. Small farm loan data was not evaluated under the geographic or borrower distribution analysis due to the relatively small number of loans. However, a summary of farm lending activity is provided within each Multi-state metropolitan and State Rating sections of this Public Evaluation. The bank's CD investments were evaluated under the Investment Test, and the bank's retail delivery systems and CD services were evaluated under the Service Test.

### **Data Integrity**

A data integrity review was performed prior to and during the evaluation to determine the accuracy and reliability of data presented. Various procedures were performed to evaluate the data collection, reporting and verification functions for WBNA CRA related information. We reviewed a sample of 1998, 1999 and 2000 home mortgage data for both WBNA and WMC. A sample of CRA data (small loans to businesses and farms) was reviewed for year 2000 only, as the previous two years of detailed loan data was not available. A sample of CD loans and investment and service activities occurring during 1998, 1999, and 2000 was also tested.

The WBNA-reported small loans to businesses and farms were generally accurate. We noted several minor errors in home mortgage data but the level of errors is not considered significant. We found that 1998 CD loan data was not always accurate with regards to loan location and CD purpose. Supporting documentation for 1998 CD services and CD grants was not always complete. However, subsequent years' data was better supported. Investment data in error was easily corrected. Overall, the data was usable for this evaluation.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, a sample of AAs within that state was selected for full-scope review. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected. Every Multi-state Metropolitan Area in which the bank has branches in more than one state received a full-scope review.

## **Ratings**

The bank's overall rating is a blend of the two Multi-state Metropolitan Area ratings and five State ratings. The State ratings are based primarily on the respective areas receiving full-scope reviews. The State ratings in North Carolina, Georgia and Virginia were heavily weighted in arriving at the bank's overall rating. Combined, these three states contain a significant majority or 77% of the bank's overall deposits.

## **Fair Lending Review**

We conducted a review of the WBNA fair lending risk processes, primarily those of the former WMC. The examination focused on statistically valid regression modeling of the WMC conventional home purchase lending activity. This area was targeted due to a relatively high disparity ratio of denials for black applicants as compared to white applicants. We reviewed and modeled 15 months of lending data for the period ended March 31, 2001.

Our results indicate adequate policies, procedures, and training programs are fully implemented. Self-evaluation processes are comprehensive and include the use of statistically valid modeling using regression analysis. No violations of the substantive provisions of the anti-discrimination laws and regulations were identified.

WMC uses the Federal National Mortgage Association (FNMA) automated Desktop Underwriter to process all home loan applications. We found the bank's use of the underwriting tool to be consistent among applicants. We also found that loan files reviewed during the examination contained appropriate documentation to support underwriting decisions.

## **Information Applicable to All Geographic Areas**

The following activities apply in all Multi-state Metropolitan Areas and states in which the bank operates. Positive consideration was given bank-wide for these CRA-related activities.

### **Lending Test**

Under the Lending Test, more weight is placed on business lending performance, as it is the bank's primary focus. Home mortgage loans and small loans to farms follow in the weighting process. CD lending has either a positive or neutral impact on lending performance. Small loans to farms and multi-family home loans are analyzed only for lending activity as few of each type of loan were originated during the evaluation period.

The reader should note that the borrower distribution analysis of loans to low- and moderate-income borrowers considers the affordability of housing and the percentage of individuals within the MSA/AA living below the poverty level. It should also be noted that WBNA does not purchase home mortgage loans, community development loans, or small loans to businesses and farms.

**Lending Gap Analysis** - A lending gap analysis did not reveal any unexplained conspicuous gaps among low- and moderate-income geographies within the respective AAs receiving full-scope reviews.

**Product Innovation and Flexibility** - The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. Through WCDC, innovative lending practices are more evident. The WCDC offers lending solutions for affordable housing and economic development projects that may not otherwise succeed without the expertise and resources available to and through the WCDC.

WBNA is a leading U.S. Small Business Administration (SBA) lender and holds Preferred Lender and Certified Lender status in North and South Carolina. For fiscal year ending 2000, WBNA was recognized as the number one SBA lender in North Carolina and in South Carolina.

WBNA was also recognized as number two and four lender in Virginia and Georgia, respectively. WBNA originates loans under the SBA's 7a General Business Loan Program and the 504 Certified Development Company Program. In 1999 and 2000, WBNA originated 729 small loans using various SBA programs. Of those, 450 were originated within the full-scope AAs reviewed, of which two percent were originated in low-income geographies and 14% were originated in moderate-income geographies.

The WBNA Neighborhood Revitalization Program offers numerous flexible-lending home loan products. The bank also uses the Federal Home Loan Bank and FNMA's affordable and first-time homebuyers assistance programs. Among these lending products and programs, flexibility is allowed in the amount of down payment, source of

funds for closing costs, and waiver of certain industry standards such as private mortgage insurance and full appraisals. In conjunction with various state agencies, the bank offers flexible loan products to those with incomes not exceeding certain levels set by those agencies and/or based on location of property.

**Community Development Lending** - WBNA, including the WCDC, is among the largest CD lenders on the East Coast. Its volume of loans compares favorably to other larger financial institutions in the Eastern region. Through WCDC, the bank serves as an important channel to other debt and equity providers to advance CD initiatives throughout its market place.

## **Service Test**

**Alternative Delivery Systems** - In addition to traditional delivery systems, WBNA developed an alternative delivery system known as Wachovia-At-Work. This worksite banking program provides access in the workplace and includes the option for employees to perform personal banking on computers at their work-site through the PC banking website provided by the bank. The vast majority of employees are low- and moderate-income individuals. This creates banking opportunities for companies with large populations of low- and moderate-income employees.

Wachovia has also developed a product that aids small businesses in their access to credit; the product is known as the Business Banking Card. Small businesses using this product can access their credit line through an automated teller machine (ATM) using this card. Small businesses can also deposit cash at ATMs and make limited purchases directly from their business checking account.

**Community Development Services** - WBNA officers provided CD Services that have had a national impact. A bank officer co-chaired a committee that was part of the National Community Reinvestment Coalition. This committee developed the SBA Community Express (pilot) program. The program resulted in a SBA product that was targeted to small businesses in low- and moderate-income geographies.

WBNA developed a program known as Personal Credit Strategies and Solutions. This company-wide program is a credit intervention program targeting individuals whose debt loads are high; while working to develop solutions to resolve credit issues before significant problems develop. Approximately 1/3 of the individuals who use this program are of low- or moderate-income.

## **Augusta-Aiken, GA-SC Multi-state Metropolitan Area**

**CRA rating for the Augusta-Aiken, GA-SC Multi-state Metropolitan Area<sup>1</sup>:**

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Satisfactory

High

The major factors that support these ratings include:

- A good loan volume, good geographic and borrower distributions of small loans to businesses and CD lending performance that enhanced the overall Lending Test rating.
- An excellent level of qualified investments and good responsiveness to identified CD needs.
- Good accessibility to delivery systems and leadership in providing CD services.

### **Description of Institution's Operations in Augusta-Aiken Multi-state Metropolitan Area**

Augusta-Aiken Multi-state (Augusta-Aiken) MSA is a relatively small market for the bank. It holds almost one percent of the bank's overall deposits and one percent of overall bank reported loans. Of overall bank-reported loans, one percent of small loans to businesses, one percent of home mortgage, one percent of CD and one-half percent of small loans to farms are in this MSA. WBNA's primary focus in the Augusta-Aiken MSA is lending to businesses with mortgage lending supplemented by WMC.

Reportable loans consist of 41% small loans to businesses, 57% home mortgage, one percent CD and close to one-half percent small loans to farms. Refer to the market profile for the "Augusta-Aiken MSA" in Appendix C for detailed demographics and other performance context information.

### **LENDING TEST**

The bank's overall performance under the Lending Test in the Augusta-Aiken MSA is rated "Outstanding."

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<sup>1</sup> This rating reflects performance within the Multi-state Metropolitan Area. The statewide evaluations do not reflect performance in the parts of those states contained within the Multi-state Metropolitan Area.

Home mortgage lending performance is somewhat weaker than for small business lending. The weaker performance relates, in part, to the bank's strategy of focusing on lending to business enterprises, including large, small and non-profit businesses. Other factors affecting performance relate to the bank's strategic decision not to purchase home mortgage loans from other originators, acquire loans through mortgage brokers or offer "high cost" mortgage lending products. WBNA originates home mortgage loans through its internal delivery channels.

### **Lending Activity**

Overall lending volume in the Augusta-Aiken MSA is good. Performance is based on a good level of small loans to business and farms, an excellent level of CD loans and an adequate level of home mortgage loans. Refer to Table 1 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Reportable loans consist of 41% small loans to businesses, 29% home purchase, 24% home refinance, four percent home improvement, one percent CD loans, close to one-half percent small loans to farm and less than one percent multi-family home loans. Overall deposit market rank is four and deposit market share is 10%.

Home mortgage lending volume is adequate. Home purchase loan market rank of 26, home improvement market rank of 17 and home refinance market rank of 23 are below or well below deposit market rank. Multi-family home loan market rank of four matches the deposit market rank.

Lending volumes of small loans to businesses and farms are good. Loan market rank for both is six and is near to the bank's deposit market rank.

CD loan volume is excellent. CD loans represent 14% of Tier 1 Capital allocated to this MSA. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of CD loans.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good in the Augusta-Aiken MSA. There is an adequate home mortgage distribution and an excellent distribution of small loans to businesses.

Refer to Tables 2, 3, 4 and 5 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage and small business loan originations.

### ***Home Mortgage Loans***

The geographic distribution of home purchase loans is poor. The percentage of loans is well below the percentage of owner-occupied units in both low- and moderate-income geographies. Market share in low-income geographies substantially meets overall market share. In moderate-income geographies, market share is below the overall market share.

The geographic distribution of home improvement loans is good. In moderate-income geographies, the percentage of loans exceeds the percentage of owner-occupied units. Market share exceeds overall market share in moderate-income geographies. The bank did not make any home improvement loans in low-income geographies.

The geographic distribution of home refinance loans is good. The percentage of loans is well below the percentage of owner-occupied units in low-income geographies. Market share in low-income geographies is below overall market share. In moderate-income geographies, the bank's percentage of loans exceeds the percentage of owner-occupied units. Market share in moderate-income geographies exceeds overall market share.

***Small Loans to Businesses***

The geographic distribution of small loans to businesses is excellent. The percentages of loans in low- and moderate-income geographies exceed the percentages of businesses in those respective geographies. Market share in each of those income levels of geographies exceeds overall market share.

***Lending Gap Analysis*** - Refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

***Inside/Outside Ratio*** - The ratios were not developed for this MSA. Refer to the States of Georgia and South Carolina sections for more information.

**Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of loans in the Augusta-Aiken MSA is adequate. There is a good borrower distribution of home mortgage loans and an adequate borrower distribution of small loans to small businesses.

Refer to Tables 7, 8, 9 and 10 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations.

***Home Mortgage Loans***

The borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families, while its market share to low-income families exceeds overall market share. The percentage of loans to moderate-income borrowers exceeds the percentage of

moderate-income families. Market share performance substantially meets overall market share.

The borrower distribution of home improvement loans is excellent. The percentage of loans to low-income borrowers is near to the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers. Market share to both income levels of borrowers exceeds overall market share.

The borrower distribution of home refinance loans is poor. The percentage of loans to low-income borrowers is well below the percentage of low-income families. Market share performance is similar and is significantly below overall market share. The percentage of loans to moderate-income borrowers is well below the percentage of moderate-income families. However, market share exceeds overall market share.

#### ***Small Loans to Businesses***

The borrower distribution of small loans to small businesses is adequate. The percentage of loans is below the percentage of small businesses. Market share is near to overall market share.

#### **Community Development Lending**

CD lending in the Augusta-Aiken MSA is excellent and has a positive impact on the bank's lending performance. Refer to Table 1 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

CD loan volume is excellent. CD lending is responsive to needs in the MSA as 60% of dollars supported affordable housing needs. About 410 affordable housing units were created and/or retained from these loans. The remaining dollars are divided between supporting the revitalization and/or stabilization of low- and moderate-income areas and CD services for low- and moderate-income individuals.

#### **Product Innovation and Flexibility**

The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. For details, refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation. Specific to Augusta, GA, the bank offers loan products through or in conjunction with the Augusta Housing Authority - Self-Sufficiency Program, the Augusta Neighborhood Improvement Corporation and the Augusta-Richmond County-Georgia Homeownership Assistance Program. In Aiken, SC, the bank offers a loan product with the New Labor Housing and Economic Development Corporation. In each state, the bank works with the respective state housing authorities to offer low-interest rate home loan products. The bank also originated five SBA guaranteed loans.

#### **INVESTMENT TEST**

The bank's performance under the Investment Test in the Augusta-Aiken MSA is rated " Outstanding." Refer to Table 12 in the " Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume of qualified investments is excellent in the Augusta-Aiken MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is four percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments supports this conclusion as well.

Current period activity includes investments totaling \$925 thousand provided in support of affordable housing programs. Total qualified investments for the Multi-state MSA also includes \$754 thousand representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a Small Business Investment Corporation (SBIC) pursuing economic development objectives throughout the WBNA geographic footprint. The remaining activity included ten grants and contributions to six organizations providing community services to low- and moderate-income residents.

Qualified investments demonstrate a good degree of responsiveness to identified CD needs considering there is a moderate level of investment opportunities available in the Augusta-Aiken MSA. Affordable housing and small business credit related investments are especially responsive to the needs of the MSA. The bank's tax credit investments also exhibited complex features. Tax credit related projects are complex because of the number of parties involved in a project, extensive paperwork requirements, complex tax-related issues, timing of fund distributions and the level of expertise required to successfully finance a project.

## **SERVICE TEST**

The bank's performance under the Service Test in the Augusta-Aiken MSA is rated " High Satisfactory."

Refer to Table 13 in the " Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Positive consideration was given to bank-wide activities discussed under " Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

## **Retail Banking Services**

In the Augusta-Aiken MSA, delivery systems are accessible to geographies and individuals of different income levels. The percentage of branches in low-income geographies is significantly lower than the percentage of individuals living in those geographies. The percentage of branches in moderate-income geographies exceeds the percentage of individuals residing in those geographies. Hours

and services do not vary in a way that inconveniences individuals living in the MSA.

Branch openings and closings in the Augusta-Aiken MSA have not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies. WBNA did not open or close any branches in low- or moderate-income geographies during the evaluation period.

**Community Development Services**

Community development service performance is excellent in the Augusta-Aiken MSA. WBNA is a leader in providing CD services. Numerous workshops and seminars relating to small business technical assistance and homebuyer education were provided. Bank officers serve in leadership positions as board members for organizations that provide affordable housing and technical assistance. In addition, one bank officer served as chairman for a local citywide community service organization.

## **Charlotte-Gastonia-Rock Hill, NC-SC Multi-state Metropolitan Area**

**CRA rating for the Charlotte-Gastonia-Rock Hill, NC-SC Multi-state  
Metropolitan Area<sup>2</sup>: Outstanding**

**The Lending Test is rated:**

Outstanding

**The Investment Test is rated:**

Outstanding

**The Service Test is rated:**

Outstanding

The major factors that support these ratings include:

- An excellent volume of small loans to businesses, good overall geographic and borrower distributions and CD lending performance that enhanced the overall Lending Test rating.
- An excellent level of qualified investments and good responsiveness to identified CD needs.
- Delivery systems that are readily accessible within the community. Leadership in providing CD services also supports the rating.

### **Description of Institution's Operations in Charlotte-Gastonia-Rock Hill Multi-state Metropolitan Area**

The Charlotte-Gastonia-Rock Hill Multi-state MSA (Charlotte MSA) holds almost five percent of overall bank deposits and eight percent of overall reported loans. Of overall bank reported loans, eight percent of CD loans, six percent of home mortgage loans, five percent small loans to businesses and one percent small loans to farms are in this MSA. WBNA's primary focus in the Charlotte MSA is lending to businesses with mortgage lending supplemented by WMC.

Reportable loans consist of 61% home mortgage, 37% small loans to businesses, almost two-percent CD and less than one-half percent small loans to farms. Notwithstanding the above distribution, more weight is placed on business lending performance, as it is the bank's primary focus. Refer to the market profile for the "Charlotte MSA" in Appendix C for detailed demographics and other performance context information.

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<sup>2</sup> This rating reflects performance within the Multi-state Metropolitan Area. The statewide evaluations do not reflect performance in the parts of those states contained within the Multi-state Metropolitan Area.

## **LENDING TEST**

The bank's overall performance under the Lending Test in the Charlotte MSA is rated "Outstanding."

Home mortgage lending performance is somewhat weaker than for small business lending. The weaker performance relates, in part, to the bank's strategy of focusing on lending to business enterprises, including large, small and non-profit businesses. Other factors affecting performance relate to the bank's strategic decision not to purchase home mortgage loans from other originators, acquire loans through mortgage brokers or offer "high cost" mortgage lending products. WBNA originates home mortgage loans through its internal delivery channels.

### **Lending Activity**

Overall lending volume in the Charlotte MSA is good. There is a good volume of small loans to farms, excellent volumes of small loans to businesses and CD loans and an adequate volume of home mortgage loans. Refer to Table 1 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Reportable loans consist of 37% small loans to businesses, 37% home purchase, 21% home refinance, less than three percent home improvement, less than two percent CD, less than one-half percent each of multi-family home loans and small loans to farms. Deposit market rank is four and deposit market share is four percent.

Home mortgage lending volume is adequate. Home purchase loan market rank of 21, home improvement market rank of 20 and home refinance market rank of 23 are all below the deposit market rank. Market rank of multi-family home loans is seven and is near to deposit market rank.

Lending volume of small loans to businesses is excellent. Loan market rank of six is near to deposit market rank, and loan market share of five percent exceeds deposit market share. Lending volume of small loans to farms is good as loan market rank is near to deposit market rank.

CD loan volume is excellent. CD loans represent 63% of Tier 1 Capital allocated to this MSA. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of CD loans.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good in the Charlotte MSA. There are good distributions of home mortgage loans and small loans to businesses.

Refer to Tables 2, 3, 4 and 5 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to

evaluate the geographic distribution of the bank's home mortgage and small business loan originations.

***Home Mortgage Loans***

The geographic distribution of home purchase loans is adequate. The percentages of loans are below and well below the percentages of owner-occupied units in low- and moderate-income geographies, respectively. In low-income areas, market share is well below overall market share. However, the bank's market share in moderate-income geographies exceeds its overall market share.

The geographic distribution of home improvement loans is excellent. In low-income geographies, the bank's percentage of loans exceeds the percentage of owner-occupied units therein. In moderate-income geographies, the percentage of loans is near to the percentage of owner-occupied units. The bank's market share in low-income geographies exceeds, and in moderate-income geographies is below, its overall market share.

The geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies is near to the percentage of owner-occupied units therein. Market share in low-income geographies is below overall market share. In moderate-income geographies, the percentage of loans is well below the percentage of owner-occupied units. Market share performance is similar and well below overall market share.

***Small Loans to Businesses***

The geographic distribution of small loans to businesses is good. The percentage of loans in low-income geographies is below the percentage of businesses therein. The percentage of loans in moderate-income geographies is near to the percentage of businesses. However, market share in each income level of geography exceeds overall market share.

***Lending Gap Analysis*** - Refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

***Inside/Outside Ratio*** - These ratios were not developed for this MSA. Refer to the States of North Carolina and South Carolina sections for more information.

**Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of loans in the Charlotte MSA is good. There are good distributions of home mortgage loans and small loans to businesses.

Refer to Tables 7, 8, 9 and 10 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations.

***Home Mortgage Loans***

The borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers is well below the percentage of low-income families, while market share to low-income families exceeds overall market share. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Market share is similar and exceeds overall market share.

The borrower distribution of home improvement loans is excellent. The percentages of loans to low-income and to moderate-income borrowers exceed the percentages of low- and moderate-income families, respectively. Market share to low-income borrowers exceeds overall market share. Market share to moderate-income borrowers is well below overall market share.

The borrower distribution of refinance loans is adequate. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families. However, its market share exceeds overall market share. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families. Market share substantially meets overall market share.

***Small Loans to Businesses***

The borrower distribution of small loans to small businesses is good.

The percentage of loans is near to the percentage of small businesses. Market share substantially meets overall market share.

**Community Development Lending**

CD lending in the Charlotte MSA is excellent and has a positive impact on the bank's overall lending performance. Refer to Table 1 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

CD loan volume is excellent. CD lending is very responsive to needs in the community as 61% of dollars support affordable housing needs.

Over 1,670 affordable housing units were created and/or retained.

Thirty-two percent of loans support the creation and/or retention of jobs for low- and moderate-income individuals by small businesses.

The remaining investments support the revitalization and/or stabilization of low- and moderate-income areas and community services to low- and moderate-income individuals.

## **Product Innovation and Flexibility**

The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. For details, refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation. Specific to the Charlotte MSA, the bank originated 31 SBA guaranteed loans of which 13% are in low-and moderate-income geographies. In conjunction with the North Carolina Housing Finance Agency and the South Carolina State Housing and Finance Development Authority, the bank offers FHA and conventional home mortgage loan products. The bank offers loan products in conjunction with the City of Charlotte - Police Officers Program, Churchill Downs Apartment conversions, and the Rock Hill Joint Venture for Affordable Housing Corporation.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Charlotte MSA is rated "Outstanding." Refer to Table 12 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume of qualified investments is excellent in the Charlotte MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is four percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments as well as unfunded commitments supports this conclusion.

Current period activity includes investments totaling \$2.5 million provided in support of affordable housing programs. Total qualified investments also include \$4.7 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout the WBNA footprint. The remaining activity included 51 grants and contributions to 34 organizations providing community services to low- and moderate-income MSA residents.

Qualified investments demonstrate a good degree of responsiveness to identified CD needs considering there is a high level of investment opportunities available in the Charlotte MSA. Investments pertaining to affordable housing and small business credit are especially responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

## **SERVICE TEST**

The bank's performance under the Service Test in the Charlotte MSA is rated " Outstanding."

Refer to Table 13 in the " Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Positive consideration was given to bank-wide activities discussed under " Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

### **Retail Banking Services**

In the Charlotte MSA, service delivery systems are readily accessible to geographies and individuals of different income levels. The percentages of branches in low- and moderate-income geographies exceed the percentages of individuals residing in those geographies. Hours and services do not vary in a way that inconveniences individuals throughout the MSA.

The record of branch openings and closings has not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies. WBNA did not open or close any branches in low- or moderate-income geographies in the MSA during the evaluation period.

### **Community Development Services**

Community development service performance is excellent in the Charlotte MSA. WBNA is a leader in providing CD services. Bank officers were instrumental in obtaining funding for an organization known as UJAMMA, Inc. The organization's purpose is to provide housing education and counseling services to families in Charlotte, but particularly low- and moderate-income families. In addition, bank officers were also instrumental in obtaining computers and related software to enhance the home ownership educational process.

A large number of workshops and seminars relating to homebuyer education and small business technical assistance were provided. These events were responsive to identified needs within the MSA.

## State of Florida

**CRA Rating for Florida:** Outstanding

**The Lending Test is rated:**

Outstanding

**The Investment Test is rated:**

Outstanding

**The Service Test is rated:**

Satisfactory

High

The major factors that support these ratings include:

- A good overall lending volume, good geographic distribution, good borrower distribution and CD lending performance that enhanced the overall Lending Test rating.
- An excellent level of qualified investments and excellent responsiveness to identified CD needs.
- Delivery systems that are accessible within its communities with improved accessibility noted in low-income geographies. Leadership qualities in providing CD services also support the rating.

### Description of Institution's Operations in Florida

WBNA is among the smaller banks operating in the State of Florida based on deposits originated in the state. Its deposit market rank is 25 and deposit market share is one-half percent. WBNA ranks far behind the number one and two banking financial institutions of Bank of America, N.A. with a deposit market share of 22% and First Union National Bank with a deposit market share of 15%. WBNA's primary focus in Florida is lending to businesses with mortgage lending supplemented by WMC.

The bank began its operations in Florida when it purchased several smaller community banks that focused on business lending. In August 1998, the bank acquired two banks specializing in small business lending. These banks had branches in West Palm Beach, Fort Lauderdale, Fort Pierce-Port St. Lucie MSA and Melbourne. In July 1998, the bank opened corporate service offices in Tampa and Jacksonville. Retail branch offices were opened in Tampa in May and July 2000. In February and October 1999, the bank opened a corporate service office in Orlando and Pensacola. The bank acquired retail branches in Orlando in October 2000 when it merged with Commerce National Bank.

Florida holds the smallest portion of overall WBNA deposits and loans. It holds three percent of the bank's overall deposits and three percent of the bank's overall reported loans. Of overall bank-reported loans, seven percent of small loans to businesses, four percent of CD loans, two percent of home mortgage loans and less than one-half percent of small loans to farms are in the state.

There are several defined AAs in the State of Florida. They consist of the metropolitan areas of Fort Lauderdale, Fort Pierce-Port St. Lucie, Jacksonville, Melbourne-Titusville-Palm Bay, Orlando, Pensacola, Tampa-St. Petersburg-Clearwater and West Palm Beach-Boca Raton. Within the defined AAs, WBNA operates 41 branch offices and 42 ATMs. In Florida, reportable loans consists of 71% small loans to businesses, 28% home mortgage, less than one percent CD loans and almost no small loans to farms. Given the urban characteristics of the AAs, there are far fewer opportunities to originate farm loans. Three small loans to farms were originated within the evaluation period.

### **Scope of Evaluation in Florida**

The State rating is based primarily on the bank's performance in the AA receiving a full-scope review, the West Palm Beach-Boca Raton (West Palm Beach) MSA. It was selected for full-scope review as it is the largest MSA for the bank in Florida and accounts for 51% of state deposits. West Palm Beach holds the largest volume of loans with 37% of reported loans originated within the state. It is also among the areas in which the bank has been operating the longest period of time.

Limited scope reviews were performed of the Fort Lauderdale, Fort Pierce-Port St. Lucie, Jacksonville, Melbourne-Titusville-Palm Bay, Orlando, Pensacola and Tampa-St. Petersburg-Clearwater MSAs. However, one should note that deposits are not taken in the Jacksonville and Pensacola branch offices.

The reader should note that consideration was given for the relatively short period of time the bank has operated in the various AAs in Florida. During the evaluation period, the bank did not have the technical support to provide affordable lending products in Florida to the extent it does in other states in which it operates. With this in mind, the expectations of the bank's home mortgage lending performance is not as high as in a market where the bank does have a staff of affordable housing lenders. Refer to the market profiles for the "State of Florida" in Appendix C for detailed demographics and other performance context information for the MSA that received a full-scope review.

### **LENDING TEST**

The bank's overall performance under the Lending Test in the State of Florida is rated "Outstanding." Based upon a full-scope review, the bank's performance in the West Palm Beach MSA is good. Stronger performance in two MSAs receiving limited scope reviews enhanced the overall Lending Test rating.

Home mortgage lending performance is somewhat weaker than for small business lending. The weaker performance relates, in part, to the bank's strategy of focusing on lending to business enterprises, including large, small and non-profit businesses. Other factors affecting performance relate to the bank's strategic decision not to

purchase home mortgage loans from other originators, acquire loans through mortgage brokers or offer "high cost" mortgage lending products. WBNA originates home mortgage loans through its internal delivery channels.

## **Conclusions for Area Receiving Full-Scope Review**

### **Lending Activity**

Overall lending volume in Florida is good. There is a good volume of lending in the West Palm Beach MSA. Refer to Table 1 in the "State of Florida" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Reportable loans in the West Palm Beach MSA consist of 70% small loans to businesses, 17% home purchase, 10% home refinance, one percent home improvement, less than one percent CD and multi-family home loans and less than one percent small loans to farms. Deposit market rank is 12 and deposit market share is three percent.

Home mortgage lending volume is poor in the West Palm Beach MSA. Home purchase loan market rank of 82, home improvement market rank of 39 and home refinance market rank of 88 are well below the deposit market rank. However, consideration is given to the extent of bank operations, its primary business focus and the relatively short period of time it has operated in the West Palm Beach MSA.

Lending volume of small loans to businesses is excellent in the West Palm Beach MSA. Loan market rank is nine and exceeds the deposit market rank.

Lending volume of small loans to farms is poor with only one loan originated in the West Palm Beach MSA during the evaluation period. However, one should consider the bank's primary business focus and the fact that there are far fewer opportunities to make farm loans in the MSA.

CD loan volume is excellent in the West Palm Beach MSA. The volume of CD loans represents seven percent of Tier 1 Capital allocated to this MSA. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of CD loans.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good in Florida. There is an adequate geographic distribution of loans in the West Palm Beach MSA. Stronger geographic distributions of loans were noted in three MSAs receiving limited scope reviews.

Refer to Tables 2, 3, 4 and 5 in the "Multi-state Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage and small business loan originations.

**Home Mortgage Loans**

The geographic distribution of home purchase loans is poor in the West Palm Beach MSA. The percentages of loans are significantly below the percentages of owner-occupied units in low- and moderate-income geographies, respectively. Market share in low-income geographies is significantly below the overall market share. In moderate-income geographies, market share is below overall market share.

The geographic distribution of home improvement loans is adequate in the West Palm Beach MSA. The percentage of loans in low-income geographies exceeds the percentage of owner-occupied units therein. In moderate-income geographies, the percentage of loans is significantly below the percentage of owner-occupied units. Market share in low-income geographies exceeds and in moderate-income geographies is significantly below the overall market share.

The geographic distribution of home refinance loans is adequate in the West Palm Beach MSA. The percentage of loans in low-income geographies is near to and in moderate-income geographies is significantly below the percentage of owner-occupied units in the respective income level of geography. Market share in low-income geographies is significantly below overall market share. In moderate-income geographies, market share is below overall market share.

**Small Loans to Businesses**

The geographic distribution of small loans to businesses is good in the West Palm Beach MSA. The percentage of loans in low-income geographies exceeds, and in moderate-income geographies is near to, the percentage of businesses in those respective geographies. Market share in each of those income levels exceeds overall market share.

**Lending Gap Analysis** - Refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

**Inside/Outside Ratio** - There was a good volume of reported loans within its defined MSAs/AA in the State of Florida. Good volume contributes positively to the bank's overall lending performance. Sixty-six percent of home mortgage and ninety-three percent of small loans to businesses were originated within the AAs during the evaluation period. This analysis considered the volume of loans originated by the bank, and did not consider loan volume of affiliated companies.

**Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of loans is good in Florida. In the West Palm Beach AA, the borrower distribution of loans is adequate. Stronger distributions of loans are noted in three AAs receiving limited scope reviews.

Wachovia Bank, N.A.

Charter Number: 1559

Refer to Tables 7, 8, 9 and 10 in the "State of Florida" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations.

***Home Mortgage Loans***

The borrower distribution of home purchase loans is poor in the West Palm Beach MSA. The percentage of loans to low-income borrower is significantly below and to moderate-income borrowers is well below the percentages of low- and moderate-income families, respectively.

Market share to low-income families is significantly below overall market share. Market share to moderate-income families substantially meets overall market share.

The borrower distribution of home improvement and refinance loans is poor in the West Palm Beach MSA. For both loan products, the percentages of loans to low-income borrowers is significantly below and to moderate-income borrowers are well below the percentages of low- and moderate-income families, respectively. Market share to both income levels is significantly below the respective overall market share for both loan products.

***Small Loans to Businesses***

The borrower distribution of small loans to small businesses is good in the West Palm Beach MSA. The percentage of loans is near to the percentage of small businesses. Market share exceeds overall market share.

**Community Development Lending**

CD lending in Florida is excellent. In the West Palm Beach MSA, CD lending performance is excellent and contributes positively to the bank's overall Lending Test rating. Refer to Table 1 in the "State of Florida" section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

Loan volume is excellent and responsive to CD needs in the West Palm Beach MSA. Ninety-three percent of dollars support the revitalization and/or stabilization of low- and moderate-income areas. The number of jobs created and/or retained for low- and moderate-income individuals was not readily available. Seven percent of dollars supports the creation and/or retention of affordable housing.

**Product Innovation and Flexibility**

The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. For details, refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation. Specific to the West Palm Beach MSA, the bank partnered with the Palm Beach County and City of Hollywood to offer affordable home loan products. The bank also originated 173 guaranteed SBA loans of which 22% are in low- and moderate-income geographies.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Lending Test in the Fort Lauderdale and Melbourne-Titusville-Palm Bay MSAs is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in Florida. Performance in these MSAs enhanced the Lending Test rating. Lending performance in the Fort Pierce-Port St. Lucie, Jacksonville, Orlando, Pensacola and Tampa-St. Petersburg-Clearwater MSAs is weaker than the bank's overall lending performance in the state. Weaker performance in the Fort Pierce-Port St. Lucie MSA is due to a less favorable overall geographic distribution of loans. In the Jacksonville, Orlando, Pensacola and Tampa-St. Petersburg-Clearwater MSAs, weaker performance is due to a less favorable overall borrower distribution of loans. The overall Lending Test rating was not impacted by weaker performance because these MSAs combined represent a small percentage of the bank's deposits in the state. Refer to the Tables 1 through 11 in the "State of Florida" section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Florida is rated "Outstanding." Based upon a full-scope review, the bank's performance is excellent in the West Palm Beach MSA. Refer to Table 12 in the "State of Florida" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **Conclusions for Area Receiving Full-Scope Review**

The volume of qualified investments is excellent in the West Palm Beach MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is nine percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments.

Current period activity in the West Palm Beach MSA includes investments totaling \$6.1 million provided in support of affordable housing programs. Total qualified investments also include \$1.4 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout WBNA geographic footprint.

Qualified investments demonstrate an excellent degree of responsiveness to identified CD needs considering there is a moderately high level of investment opportunities available in West Palm Beach MSA. Investments pertaining to affordable housing and small business credit are especially responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Investment Test in the Fort Lauderdale, Fort Pierce-Port St. Lucie, Melbourne-Titusville-Palm Bay, Orlando and Tampa-St. Petersburg-Clearwater Bay MSAs is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in Florida. In the Jacksonville and Pensacola MSAs, the bank's performance is weaker than the bank's overall performance in the state. Weaker performance resulted from lower volumes of qualified investments in the two MSAs.

Weaker performance in these MSAs did not impact the bank's overall performance under the Investment Test in Florida due to the bank's comparatively limited presence in the two MSAs.

## **SERVICE TEST**

The bank's performance under the Service Test in Florida is rated "High Satisfactory." Based upon a full-scope review, the bank's performance in the West Palm Beach MSA is good.

Refer to Table 13 in the "State of Florida" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Positive consideration was given to bank-wide activities discussed under "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

## **Conclusions for Area Receiving Full-Scope Review**

### **Retail Banking Services**

In the West Palm Beach MSA, WBNA's service delivery systems are accessible to geographies and individuals of different income levels.

The percentage of branches in low-income geographies exceeds the percentage of individuals residing in those geographies. The percentage of branches in moderate-income geographies is significantly lower than the percentage of individuals residing in those geographies. Hours and services do not vary in a way that inconveniences individuals throughout the MSA.

WBNA's record of opening and closing branches has somewhat improved the accessibility of delivery systems particularly in low-income geographies. WBNA purchased one branch in a low-income geography during the evaluation period.

### **Community Development Services**

Community development service performance is excellent in the West Palm Beach MSA. WBNA is a leader in providing CD Services. Bank officers displayed leadership in obtaining affordable housing credit and revitalization for various areas within the MSA. A WBNA officer works with various community groups to provide technical assistance and creative financing for minority-owned small businesses in the

MSA. WBNA held homebuyer education workshops as well as basic banking education seminars.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, performance in the Fort Lauderdale, Fort Pierce-Port St. Lucie and the Pensacola MSAs is stronger than the bank's overall "High Satisfactory" performance under the Service Test in Florida. Stronger performance is due primarily to better branch distributions. Stronger performance in the aforementioned MSAs did not affect the rating, as they comprise only about 25% of total deposits within the state. Performance in the remainder of the MSAs receiving limited-scope reviews, excluding the Orlando MSA, is not inconsistent with the bank's overall performance under the Service Test in Florida. Performance in the Orlando MSA is weaker than the bank's overall performance under the Service Test in Florida. Weaker performance is primarily due to a less favorable branch distribution. Weaker performance did not affect the overall rating due to the MSA's minimal volume of deposits in the state.

## State of Georgia

CRA Rating for Georgia<sup>3</sup>: Outstanding

The Lending Test is rated:

Outstanding

The Investment Test is rated:

Satisfactory

High

The Service Test is rated:

Satisfactory

High

The major factors that support these ratings include:

- An overall excellent lending volume, good overall geographic and borrower distributions and CD lending performance that enhanced the overall Lending Test rating.
- A good level of qualified investments and good responsiveness to identified CD needs.
- Good access to delivery systems. Leadership characteristics in providing CD services also support the rating.

### Description of Institution's Operations in Georgia

WBNA is among the largest banks operating in Georgia based on bank deposits originated in the state. Its deposit market rank is three and deposit market share is 10%. Major competitors and their market shares include Bank of America, N. A. 12%, SunTrust Bank 12%, and First Union National Bank nine percent. WBNA's primary focus in Georgia is lending to businesses with mortgage lending supplemented by WMC.

Georgia holds almost 25% of the bank's overall deposits and 21% of the bank's overall reported loans, respectively. Of overall bank reported loans, 28% of CD loans, 21% of home mortgage loans, 21% of small loans to businesses and seven percent small loans to farms are in the state.

There are many defined AAs in the State of Georgia. They consist of one major metropolitan area (Atlanta) and three other smaller metropolitan areas, (Athens, Macon and Savannah). The bank also defined non-metropolitan statistical (Non-MSA) AAs located in north and central Georgia. These are Bulloch, Gordon, Hall, Lumpkin, Sumter and Whitfield Counties. Within the defined AAs, it operates 126 branch offices and 292 ATMs.

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<sup>3</sup> For institutions with branches in two or more states in a Multi-state Metropolitan Area, this statewide evaluation does not reflect performance in the parts of this state contained within the Multi-state Metropolitan Area. Refer to the Multi-state Metropolitan Area rating and discussion for the rating and evaluation of the institution's performance in that area.

In Georgia, reportable loans consist of 56% home mortgage loans, 42% small loans to businesses, almost two percent CD and less than one percent small loans to farms. WBNA originated 105 small loans to farms during the evaluation period. Of those, 18% were made in low- and moderate-income geographies in primarily rural areas across Georgia.

### **Scope of Evaluation in Georgia**

The State rating is based primarily on the bank's performance in the Atlanta MSA, the AA receiving a full-scope review. It was selected for a full-scope review as it is the largest MSA/AA and accounts for 82% of total deposits in Georgia. Atlanta also holds the largest volume of loans with 79% of reported loans originated within the state. Limited scope reviews were performed of the Athens, Macon and Savannah MSAs and the GA Non-MSA AAs. GA Non-MSA AAs were analyzed on a combined basis for purposes of this evaluation. In the evaluation of the bank's performance, consideration is given to the extent of competition for deposits and loans. As of June 30, 2000, there were approximately 102 deposit-taking financial institutions in the Atlanta MSA. In 1999, there were over 750 home mortgage and 250 small business lenders vying for loans in the area. Refer to the market profiles for the "State of Georgia" in Appendix C for detailed demographics and other performance context information for the MSA receiving a full-scope review.

### **LENDING TEST**

The bank's overall performance under the Lending Test in the State of Georgia is rated "Outstanding." Based upon a full-scope review, the bank's performance in the Atlanta MSA is excellent.

### **Conclusions for Area Receiving Full-Scope Review**

#### **Lending Activity**

The overall volume of lending in Georgia is excellent. There is an excellent volume of lending in the Atlanta MSA. Refer to Table 1 in the "State of Georgia" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Reportable loans in the Atlanta MSA consist of 43% small loans to businesses, 29% home purchase, 22% home refinance, three percent home improvement, two percent CD and less than one percent each of multi-family home and small loans to farms. Deposit market rank is three and deposit market share is 15%.

Home mortgage lending volume is good in the Atlanta MSA. Home purchase loan market rank of 24, home improvement market rank of 12 and home refinance market rank of 27 are below deposit market rank.

Although the loan market ranks are below deposit market ranks, the large number of home mortgage lenders in the Atlanta MSA is

considered in our evaluation. Multi-family home loan market rank matched the deposit market rank.

Lending volume of small loans to businesses is excellent in the Atlanta MSA. Loan market rank matches deposit market rank. Lending volume of small loans to farms is good. Loan market rank almost meets deposit market rank.

CD loan volume is excellent. The volume of CD loans represents 45% of Tier 1 Capital allocated to the Atlanta MSA. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of CD lending.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good in Georgia. A good geographic distribution of loans is noted in the Atlanta MSA.

Refer to Tables 2, 3, 4 and 5 in the "State of Georgia" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage and small business loan originations.

#### ***Home Mortgage Loans***

The geographic distribution of home purchase loans is good in the Atlanta MSA. The percentage of loans in low-income geographies is below the percentage of owner-occupied units therein. In moderate-income geographies, the percentage of loans is near to the percentage of owner-occupied units. Market share in low-income geographies is below the overall market share. In moderate-income geographies, market share exceeds overall market share.

The geographic distribution of home improvement loans is excellent in the Atlanta MSA. The percentages of loans in low- and moderate-income geographies exceed the percentages of owner-occupied units in their respective geographies. Market shares in low- and moderate-income geographies exceed the overall market share.

The geographic distribution of home refinance loans is good in the Atlanta MSA. The percentages of loans in both low- and moderate-income geographies are near to the percentages of owner-occupied units in their respective geographies. Market share in low-income geographies substantially meets the overall market share. In moderate-income geographies, market share exceeds overall market share.

#### ***Small Loans to Businesses***

The geographic distribution of small loans to businesses is good in the Atlanta MSA. The percentages of loans in low- and moderate-income geographies are near to the percentages of businesses in those respective geographies. However, market share in each of those income levels of geographies exceed the overall market share.

**Lending Gap Analysis** - Refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

**Inside/Outside Ratio** - There is an excellent volume of reported loans within the defined AAs in the State of Georgia. Excellent volume contributes positively to the bank's overall lending performance.

Eighty-nine percent of home mortgage and ninety-five percent of small loans to businesses were originated within the AAs during the evaluation period. The analysis considered the volume of loans originated by the bank, and did not consider loan volume of affiliated companies.

### **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of loans is good in Georgia. A good borrower distribution of loans was noted in the Atlanta MSA.

Refer to Tables 7, 8, 9 and 10 in the "State of Georgia" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations.

#### **Home Mortgage Loans**

The borrower distributions of home purchase and home refinance loans are similar and deemed good in the Atlanta MSA. For each loan product, the percentage of loans to low-income borrowers is significantly below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families.

The borrower distribution of home improvement loans is excellent in the Atlanta MSA. The percentage of loans to low- and to moderate-income borrowers exceeds the percentage of low- and moderate-income families, respectively.

In the Atlanta MSA, market shares to both low- and moderate-income borrowers exceed their respective overall market share for all home mortgage loan products.

#### **Small Loans to Businesses**

The borrower distribution of small loans to small businesses is good in the Atlanta MSA. The percentage of loans is near to the percentage of small businesses. Market share is below overall market share.

### **Community Development Lending**

CD lending in Georgia is excellent and had a positive impact on the bank's overall lending performance. In the Atlanta MSA, CD lending performance is excellent. Refer to Table 1 in the "State of Georgia" section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

Loan volume is excellent and responsive to CD needs in the Atlanta MSA. Fifty-six percent of dollars support affordable housing needs.

Over 5,230 affordable housing units were created and/or retained from these loans. Thirty-eight percent of dollars support CD services. The remaining six percent of dollars support the creation and/or retention of 1,833 jobs for low- and moderate-income individuals.

### **Product Innovation and Flexibility**

The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. For details, refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation. In Georgia, the bank offers Federal Housing Administration (FHA) and conventional loan products in conjunction with the Georgia Department of Community Affairs. Specific to the Atlanta MSA, the bank offers loan products in conjunction with the Atlanta Empowerment Zone, Fulton County Down Payment Assistance Program and Urban Residential Finance Authority. The bank also originated 99 guaranteed SBA loans of which 14% are in low- and moderate-income geographies.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Lending Test in the Savannah MSA is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in Georgia. In the Athens and Macon MSAs and GA Non-MSA AAs, the bank's performance is weaker than the bank's overall performance in Georgia. In the Athens MSA and GA Non-MSA AAs, weaker performance is due to less favorable geographic and borrower distributions of loans. In the Macon MSA, weaker performance is due to a lower loan volume and a less favorable overall borrower distribution of loans. The overall Lending Test rating is not impacted because these weaker AAs combined hold a small percentage of the bank's deposits in the state. Refer to the Tables 1 through 11 in the "State of Georgia" section of Appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in Georgia is rated "High Satisfactory." Based upon a full-scope review, the bank's performance is good in the Atlanta MSA. Refer to Table 12 in the "State of Georgia" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Conclusions for Area Receiving Full-Scope Review**

The volume of qualified investments is good in the Atlanta MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is two percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments supports this conclusion as well.

Current period activity in the Atlanta MSA includes investments totaling \$4.4 million provided in support of affordable housing programs. Total qualified investments also include \$15.3 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout WBNA geographic footprint. The remaining activity included 83 grants and contributions to 64 organizations providing community services to low- and moderate-income MSA residents.

Qualified investments demonstrate a good degree of responsiveness to identified CD needs considering there is a high level of investment opportunities available in the Atlanta MSA. Investments pertaining to affordable housing and small business credit are especially responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Investment Test in the Athens, Macon and Savannah MSAs and GA Non-MSA AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Investment Test in Georgia.

### **SERVICE TEST**

The bank's performance under the Service Test in Georgia is rated "High Satisfactory." Based upon a full-scope review, the bank's performance in the Atlanta MSA is good.

Refer to Table 13 in the "State of Georgia" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Positive consideration was given to bank-wide activities discussed under "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

## **Conclusions for Area Receiving Full-Scope Review**

### **Retail Banking Services**

In the Atlanta MSA, WBNA's service delivery systems are accessible to geographies and individuals of different income levels. The percentage of branches in low-income geographies is lower than the percentage of low-income individuals residing in those geographies.

The percentage of branches in moderate-income geographies exceeds the percentage of individuals residing in those geographies. Hours and services do not vary in a way that inconveniences individuals throughout the MSA.

WBNA's record of opening and closing branches in the Atlanta MSA has generally not adversely affected the delivery systems in low- and moderate-income geographies. During the evaluation period, WBNA closed a net of four branches in moderate-income geographies. However, three of the branches closed were limited-service facilities while two of the openings were full service offices. In addition, WBNA expended significant resources to upgrade the service levels of existing branches that were in close proximity to one of the branches that was closed.

### **Community Development Services**

Community development service performance is excellent in the Atlanta MSA. WBNA is a leader in providing CD Services. Bank officers were instrumental in the Capital campaign for the Latin American Association's new building. The Association provides various services predominantly to low- and moderate-income individuals. In addition, WBNA provided significant leadership in working with COPA to provide financing to develop the area around the Centennial Olympic Park for which there is a 20% affordable housing set-aside.

WBNA held a large number of seminars and workshops regarding credit education and technical assistance for both consumers and small businesses.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Service Test is stronger in the Macon MSA and weaker in the Savannah MSA than the bank's overall "High Satisfactory" performance under the Service Test in Georgia. Stronger performance is due to a better branch distribution. Weaker performance is due to a less favorable branch distribution. The Macon MSA and Savannah MSA performance had minimal impact on the overall Service Test rating as these MSAs represent a small 8% of total deposits in the state. Performance in the Athens MSA and GA Non-MSA AAs is not inconsistent with the bank's overall performance under the Service Test in Georgia.

## State of North Carolina

### CRA Rating for North Carolina<sup>4</sup>:

Outstanding

**The Lending Test is rated:**

Outstanding

**The Investment Test is rated:**

Satisfactory

High

**The Service Test is rated:**

Satisfactory

High

The major factors that support these ratings include:

- A good lending volume and good geographic and borrower distributions of loans. CD lending performance enhanced the overall Lending Test rating.
- Good to excellent levels of qualified investments and good responsiveness to CD needs.
- Good access to delivery systems and leadership qualities noted in providing CD services.

### Description of Institution's Operations in North Carolina

WBNA is among the largest banks operating in North Carolina based on bank deposits originated in the state. Its deposit rank is three and deposit market share is 12%. Major competitors with their market shares are Bank of America, N.A., 25%, Branch Banking and Trust Company (BB&T), 15% and First Union National Bank, 12%. WBNA's primary focus in North Carolina is lending to businesses with mortgage lending supplemented by WMC.

North Carolina holds almost 30% of the bank's overall deposits and 33% of overall reported loans. Of overall bank-reported loans, 68% of small loans to farms, 31% of home mortgage loans, 28% of CD loans and 27% of small loans to businesses are in the state.

There are many defined AAs in the State of North Carolina. They consist of the two major metropolitan areas of Greensboro--Winston-Salem--High Point (Greensboro--Winston-Salem), Raleigh-Durham-Chapel Hill (Raleigh-Durham) and eight other metropolitan areas, those being Asheville, Fayetteville, Goldsboro, Greenville, Hickory-Morganton-Lenoir, Jacksonville, Rocky Mount and Wilmington. AAs also include Non-MSAs located across the state. These include the counties of Beaufort, Bladen, Carteret, Cherokee, Craven, Dare, Graham, Greene, Haywood, Henderson, Hertford, Iredell, Jackson, Lee, Lenoir, Macon,

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<sup>4</sup> For institutions with branches in two or more states in a Multi-state Metropolitan Area, this statewide evaluation does not reflect performance in the parts of this state contained within the Multi-state Metropolitan Area. Refer to the Multi-state Metropolitan Area rating and discussion for the rating and evaluation of the institution's performance in that area.

Martin, Moore, Pamlico, Pasquotank, Robeson, Rockingham, Scotland, Stanly, Watauga (starting in 1999), Wilkes and Wilson. Cherokee, Graham and Macon counties were eliminated as AAs in 2000. Within its defined AAs, it operates 156 branch offices and 377 ATMs.

In North Carolina, reportable loans consist of 59% home mortgage, 38% small loans to businesses, two percent small loans to farms and one percent CD. Farm lending is strong when compared to other states in which the bank operates. Of the 1,115 small loans to farms originated in the state, 20% were made in low- and moderate-income geographies in primarily rural areas across North Carolina.

### **Scope of Evaluation in North Carolina**

The State rating is based primarily on the bank's performance in the Greensboro--Winston-Salem and Raleigh-Durham MSAs, the two largest AAs in terms of bank deposits in the state. Greensboro--Winston-Salem holds 45% and Raleigh-Durham holds 18% of bank deposits in North Carolina. Greensboro--Winston-Salem holds the third largest number of loans with 21% of reported loans originated within the state. Raleigh-Durham holds the largest volume with 22% of reported loans. Non-MSA AAs combined hold the largest share with 32% of reported loans. Limited scope reviews were performed of the Asheville, Fayetteville, Goldsboro, Greenville, Hickory-Morganton-Lenoir, Jacksonville, Rocky Mount and Wilmington MSAs and NC Non-MSA AAs. Non-MSA AAs were analyzed on a combined basis for purposes of this evaluation. Refer to the market profiles for the "State of North Carolina" in Appendix C for detailed demographics and other performance context information for MSAs that received full-scope reviews.

### **LENDING TEST**

The bank's overall performance under the Lending Test in the State of North Carolina is rated "Outstanding." Based upon full-scope reviews, the bank's performance in the Greensboro--Winston-Salem and Raleigh-Durham MSAs is excellent.

Home mortgage lending performance is somewhat weaker than for small business lending. The weaker performance relates, in part, to the bank's strategy of focusing on lending to business enterprises, including large, small and non-profit businesses. Other factors affecting performance relate to the bank's strategic decision not to purchase home mortgage loans from other originators, acquire loans through mortgage brokers or offer "high cost" mortgage lending products. WBNA originates home mortgage loans through its internal delivery channels.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Lending Activity**

The overall volume of lending in North Carolina is adequate. Adequate volumes of lending were noted in the Greensboro--Winston-Salem and Raleigh-Durham MSAs. Refer to Table 1 in the "State of North Carolina" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

#### Greensboro--Winston-Salem MSA

Reportable loans consist of 37% home purchase loans, 34% small loans to businesses, 26% home refinance loans, two percent home improvement loans, almost one percent CD loans and a very small portion of small loans to farms and multi-family home loans. Overall deposit market rank is two and deposit market share is 28%.

Home mortgage lending volume is adequate. Home purchase loan market rank of eight, home improvement market rank of 15 and home refinance market rank of 13 are below the deposit market rank. Multi-family home loan market rank of four is near to overall deposit market rank.

Lending volume of small loans to businesses is good. Loan market rank is five and near to the deposit market rank. Lending volume of small loans to farms is adequate. Loan market rank of 12 is below deposit market rank.

CD loan volume is excellent. The volume of CD loans represent 15% of Tier 1 Capital allocated to this MSA. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of CD loans.

#### Raleigh-Durham MSA

Reportable loans consist of 40% small loans to businesses, 34% home purchase, 21% home refinance, two percent CD, two percent home improvement and less than one percent each of small loans to farms and multi-family loans. Deposit market rank is one and market share is 19%.

Home mortgage lending volume is adequate. Home purchase loan market rank of 16, home improvement market rank of 17, home refinance market rank of 16 and multi-family home market rank of seven are below the deposit market rank.

Lending volume of small loans to businesses is adequate. Loan market rank of seven is below deposit market rank. Lending volume of small loans to farms is adequate. Loan market rank of seven is below deposit market rank.

CD loan volume is excellent. CD loans represent 75% of Tier 1 Capital allocated to this MSA.

## **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good in North Carolina. In both the Greensboro--Winston-Salem and Raleigh-Durham MSAs, the geographic distributions of loans are good.

Refer to Tables 2, 3, 4 and 5 in the "State of North Carolina" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage and small business loan originations.

### ***Home Mortgage Loans***

#### *Greensboro--Winston-Salem MSA*

The geographic distribution of home purchase loans is poor. The percentage of loans is well below the percentage of owner-occupied units in low-income and is significantly below the percentage of owner-occupied units in moderate-income geographies. Market share in low-income geographies exceeds overall market share. In moderate-income geographies, market share is well below overall market share.

The geographic distribution of home improvement loans is excellent. The percentages of loans in low- and moderate-income geographies exceed the percentages of owner-occupied units in each income level of geography. Market share in low-income geographies exceeds overall market share. In moderate-income geographies, market share is well below overall market share.

The geographic distribution of home refinance loans is poor. The percentages of loans in low- and moderate-income geographies are well below the percentage of owner-occupied units in each income level, respectively. Market share in each income level of geography is well below overall market share.

#### *Raleigh-Durham MSA*

The geographic distribution of home purchase loans is poor. The percentages of loans are significantly below the percentages of owner-occupied units in both low-income and moderate-income geographies, respectively. Market share in low-income geographies is significantly below and in moderate-income geographies is well below the overall market share.

The geographic distribution of home improvement loans is good. The percentage of loans in low-income geographies exceeds the percentage of owner-occupied units, therein. In moderate-income geographies, the percentage of loans is near to the percentage of owner-occupied units. Market shares in low-income and moderate-income geographies exceed the overall market share.

The geographic distribution of home refinance loans is poor. The percentages of loans in low- and moderate-income geographies are well below the percentage of owner-occupied units in each income level, respectively. Market share in each income level of geography is significantly below the overall market share.

### ***Small Loans to Businesses***

#### *Greensboro--Winston-Salem MSA*

The geographic distribution of small loans to businesses is good.

The percentage of loans in low-income geographies is below the percentage of businesses, therein. The percentage of loans in moderate-income geographies is near to the percentage of businesses.

However, market share exceeds overall market share in each income level of geography.

#### *Raleigh-Durham MSA*

The geographic distribution of small loans to businesses is good.

The percentage of loans in low-income geographies exceeds the percentage of businesses. In moderate-income geographies, the percentage of loans is below the percentage of businesses. Market share in low-income geographies exceeds overall market share while in moderate-income geographies, market share substantially meets overall market share.

***Lending Gap Analysis*** - Refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

***Inside/Outside Ratio*** - There is an excellent volume of reported loans within its defined AAs in the State of North Carolina. Excellent volume contributes positively to the bank's overall lending performance. Ninety percent of home mortgage and 96% of small loans to businesses were originated within the AAs during the evaluation period. This analysis considered loans originated by the bank, and did not consider loan volume of affiliated companies.

### ***Distribution of Loans by Income Level of the Borrower***

The overall borrower distribution of loans is good in North Carolina.

Good performance is noted in both the Greensboro--Winston-Salem and Raleigh-Durham MSAs.

Refer to Tables 7, 8, 9 and 10 in the "State of North Carolina" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations.

### ***Home Mortgage Loans***

#### *Greensboro--Winston-Salem MSA*

The borrower distribution of home purchase loans is adequate. The bank's percentage of loans to low-income borrowers is significantly below the percentage of low-income families. Market share to low-income borrowers is well below overall market share. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Market share exceeds overall market share.

The borrower distribution of home improvement loans is excellent.

The percentages of loans to low- and to moderate-income borrowers

exceed the percentages of low- and moderate-income families, respectively. Market share to low-income families substantially meets overall market share. Market share to moderate-income families exceeds overall market share.

The borrower distribution of refinance loans is poor. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families. Market share to low-income borrowers is well below overall market share. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families. Market share is below overall market share.

#### Raleigh-Durham MSA

The borrower distribution of home purchase loans is adequate. Lending performance is similar to that in the Greensboro--Winston-Salem MSA. However, market share to low-income borrowers differs. Market share to low-income families is below overall market share. Market share to moderate-income borrowers exceeds overall market share.

The borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers exceeds the percentage of low-income families. Market share to low-income borrowers exceeds the overall market share. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families. Market share is significantly below overall market share.

The borrower distribution of refinance loans is poor. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families. Market share is better and is below overall market share. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families. However, market share exceeds overall market share.

#### **Small Loans to Businesses**

In the Greensboro--Winston-Salem and Raleigh-Durham MSAs, the borrower distributions of small loans to small businesses are similar and deemed good. The percentage of loans is near to the percentage of small businesses. Market share exceeds overall market share in each MSA.

#### **Community Development Lending**

CD lending performance in North Carolina is excellent and has a positive impact on overall lending performance. CD lending in both the Greensboro--Winston-Salem and Raleigh-Durham MSAs is excellent.

Refer to Table 1 in the "State of North Carolina" section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

#### Greensboro--Winston-Salem MSA

Loan volume is excellent and responsive to CD needs in the MSA. Sixty-three percent of dollars support the revitalization and/or

stabilization of low- and moderate-income areas. The number of jobs created from those investments is not readily available. Twenty-nine percent of loans support CD services provided to low- and moderate-income people. Eight percent of loans support the creation and/or retention of affordable housing units.

Raleigh-Durham MSA

Loan volume is excellent and responsive to CD needs in the MSA. Seventy-five percent of dollars support affordable housing needs. Over 1,900 affordable housing units were created and/or retained from these loans. Twenty percent of dollars support CD services. The remaining five percent supports economic development and the revitalization and/or stabilization of low- and moderate-income areas.

**Product Innovation and Flexibility**

The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. For details, refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation. Specific to the Greensboro--Winston-Salem MSA, the bank offers loan products in conjunction with the Greensboro Affordable Home Loan Initiative, Housing Opportunities, Inc., Project Homestead, Inc. and Winston-Salem Housing Partnership. WBNA originated 31 guaranteed SBA loans, of which 13% are in low- and moderate-income geographies. Specific to the Raleigh-Durham MSA, the bank offers loan products in conjunction with Duke Trinity Heights, Johnston County Initiative and Granville Regional CD Corporation, to name a few. Also, of the 25 guaranteed SBA loans originated, 12% are in low- and moderate-income geographies.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Lending Test in the Asheville, Goldsboro, Jacksonville and Wilmington MSAs and NC Non-MSA AAs is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in North Carolina. In the Fayetteville, Greenville, Hickory-Morganton-Lenoir and Rocky Mount MSAs, performance is weaker than the bank's overall performance in the state. Weaker performance in the Fayetteville and Greenville MSAs is due to a less favorable borrower distribution of loans. In the Hickory-Morganton-Lenoir and Rocky Mount MSAs, weaker performance is due to less favorable geographic and borrower distributions of loans. The overall Lending Test rating is not impacted because these weaker MSAs combined represent a small percentage of the bank's deposits in the state. Refer to the Tables 1 through 11 in the "State of North Carolina" section of Appendix D for the facts and data that support these conclusions.

**INVESTMENT TEST**

The bank's performance under the Investment Test in North Carolina is rated "High Satisfactory." Based upon full-scope reviews, the bank's performance is good in the Greensboro--Winston-Salem MSA and excellent in the Raleigh-Durham MSA. Refer to Table 12 in the "State of North Carolina" section of Appendix D for the facts and data that support these conclusions.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### Greensboro--Winston-Salem MSA

The volume of qualified investments is good in the MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is two percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments as well as unfunded commitments supports this conclusion as well.

Current period activity includes investments totaling \$3.4 million and \$2.0 million in support of affordable housing and community services targeted at low- and moderate-income individuals, respectively. Qualified investments also include \$8.1 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout the WBNA geographic footprint. The remaining activity included 94 grants and contributions to 70 organizations providing community services to low- and moderate-income MSA residents.

Qualified investments demonstrate a good degree of responsiveness to identified CD needs considering there is a high level of investment opportunities available in the MSA. Investments pertaining to affordable housing and small business credit are especially responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

#### Raleigh-Durham MSA

The volume of qualified investments is excellent in the MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is three percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments as well as unfunded commitments supports this conclusion as well.

Current period activity includes investments totaling \$2.5 million provided in support of affordable housing programs. Qualified investments also include \$5.9 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout the WBNA geographic footprint. The remaining activity included 69 grants and contributions to 58 organizations providing community services to low- and moderate-income MSA residents.

Qualified investments demonstrate a good degree of responsiveness to identified CD needs considering there is a high level of investment opportunities available in the MSA. Investments pertaining to affordable housing and small business credit are especially responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Investment Test in the Asheville, Fayetteville, Goldsboro and Wilmington MSAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Investment Test in North Carolina. In the Greenville, Hickory-Morganton-Lenoir, Jacksonville and Rocky Mount MSAs and the NC Non-MSA AAs, the bank's performance is stronger than the bank's overall performance in the state. Stronger performance resulted from higher volumes of qualified investments in the respective MSAs/AAs. Stronger performance did not impact the bank's overall performance under the Investment Test in North Carolina as the MSAs/AA's account for only six percent of the bank's total deposits in the state.

### **SERVICE TEST**

The bank's performance under the Service Test in North Carolina is rated "High Satisfactory." Based upon full-scope reviews, the bank's performance in the Greensboro--Winston-Salem MSA is excellent and in the Raleigh-Durham MSA is good.

Refer to Table 13 in the "State of North Carolina" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Positive consideration was given to bank-wide activities discussed under "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

#### Greensboro--Winston-Salem MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels. The percentages of branches in low- and moderate-income geographies exceed the percentages of individuals residing in those geographies, respectively. Hours and services do not vary in a way that inconveniences individuals throughout the MSA.

WBNA's record of opening and closing branches has not adversely affected the accessibility of service delivery systems throughout the Greensboro--Winston-Salem MSA. While one office was closed in a moderate-income geography, it opened a new office approximately one mile from the closed office.

#### Raleigh-Durham MSA

Service delivery systems are accessible to geographies and individuals of different income levels. The percentage of branches in low-income geographies exceeds the percentage of low-income individuals residing in those geographies. The percentage of branches in moderate-income geographies is lower than the percentage of individuals residing in like geographies. Hours and services do not vary in a way that inconveniences individuals throughout the MSA.

WBNA's record of opening and closing offices has not affected the accessibility of service delivery systems. During the evaluation period, WBNA both opened and closed one office in a low-income geography.

### **Community Development Services**

#### Greensboro--Winston-Salem MSA

Community development service performance is excellent in the MSA. WBNA is a leader in providing CD services. One bank officer was instrumental in leading the fund raising campaign to bring the Local Initiatives Support Coalition to Greensboro. The organization provides technical assistance as well as funding to various CDCs within the Greensboro area. Another bank officer was instrumental in establishing other organizations that provide technical assistance and credit education to consumers, small businesses as well as other CDCs. WBNA held numerous seminars on consumer and small business credit, which met an identified need in the community. In addition, various WBNA officers provided significant leadership in providing CD Services in the community.

#### Raleigh-Durham MSA

Community development service performance is excellent in the MSA. WBNA is a leader in providing CD services. Strong leadership was provided in this MSA as one bank officer served as fund raising chairman for the North Carolina Community Development Initiative. The organization acts as an umbrella organization for CDCs

throughout the State of North Carolina primarily through the provision of grants. Numerous seminars and workshops were held to meet the need for credit counseling and technical assistance for small businesses.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Service Test in the Asheville, Goldsboro, Jacksonville and Rocky Mount MSAs is stronger than the bank's overall "High Satisfactory" performance under the Service Test in North Carolina. The primary reason for stronger performance is due to a more favorable branch distribution in the respective MSAs. The performance in the aforementioned MSAs had a relatively minimal affect on the bank's overall Service Test performance, as on a combined basis, they represent about 10% of the total deposits of the state. In the remainder of the limited-scope AAs, excluding the Fayetteville MSA, performance is not inconsistent with the bank's overall performance in the state. Performance under the Service Test in the Fayetteville MSA is weaker than the bank's overall performance in the state primarily due to a less favorable branch distribution. Weaker performance did not impact the overall rating due to the minimal amount of deposits in the MSA.

## State of South Carolina

### CRA Rating for South Carolina<sup>5</sup>:

	<u>Outst</u>
<u>anding</u>	
<b>The Lending Test is rated:</b>	
<u>Outstanding</u>	
<b>The Investment Test is rated:</b>	
<u>Outstanding</u>	
<b>The Service Test is rated:</b>	<u>High</u>
<u>Satisfactory</u>	

The major factors that support these ratings include:

- A good overall lending volume, a good geographic distribution of small loans to businesses and CD lending performance that enhanced the overall Lending Test rating.
- An excellent level of qualified investments and adequate responsiveness to identified CD needs.
- Good access to delivery systems and leadership in providing CD services.

### Description of Institution's Operations in South Carolina

WBNA is the largest bank in the State of South Carolina based on deposits originated in the state. Its deposit market rank is one and deposit market share is 16%. Bank of America N. A. and Branch Banking and Trust Company (BB&T) of South Carolina follow with deposit market shares of 13% and 11%, respectively. WBNA's primary business focus in South Carolina is lending to businesses with mortgage lending supplemented by WMC.

South Carolina holds almost 15% of the bank's overall deposits and 19% of overall reported loans. Of overall bank-reported loans, 21% home mortgage, 19% CD, 16% small loans to businesses and 14% small loans to farms are in the state.

There are several defined AAs in the State of South Carolina. They consist of the metropolitan areas of Greenville-Spartanburg-Anderson, Charleston-North Charleston, Columbia, Myrtle Beach and Sumter. AAs also include Non-MSAs located across the state. These include the counties of Abbeville, Bamberg, Beaufort, Calhoun, Chesterfield, Colleton, Darlington, Dillon, Fairfield, Georgetown, Greenwood, Kershaw, Lancaster, Laurens, Marion, Marlboro, Newberry, Oconee,

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<sup>5</sup> For institutions with branches in two or more states in a Multi-state Metropolitan Area, this statewide evaluation does not reflect performance in the parts of this state contained within the Multi-state Metropolitan Area. Refer to the Multi-state Metropolitan Area rating and discussion for the rating and evaluation of the institution's performance in that area.

Orangeburg and Union. Within its defined AAs, the bank operates 105 branch offices and 269 ATMs.

In South Carolina, reportable loans consist of 62% home mortgage, 36% small loans to businesses, one percent CD and almost one percent small loans to farms. Farm lending volume is moderate. Of the 249 small loans to farms originated, 13% were made in low- and moderate-income geographies in primarily rural areas across South Carolina.

### **Scope of Evaluation in South Carolina**

The State rating is based primarily on the bank's performance in the Greenville-Spartanburg-Anderson (Greenville-Spartanburg) MSA, the AA selected for a full-scope review. It is the largest AA in South Carolina and accounts for 26% of state deposits. Greenville-Spartanburg also holds the largest volume of loans with 27% of reported loans originated within the state. Limited scope reviews were performed of the Charleston-North Charleston, Columbia, Florence, Myrtle Beach and Sumter MSAs and SC Non-MSA AAs. SC Non-MSA AAs were analyzed on a combined basis for purposes of this evaluation. Refer to the market profiles for the "State of South Carolina" in Appendix C for detailed demographics and other performance context information for MSA that received full-scope reviews.

### **LENDING TEST**

The bank's overall performance under the Lending Test in the State of South Carolina is rated "Outstanding." Based upon a full-scope review, the bank's performance in the Greenville-Spartanburg MSA is excellent.

Home mortgage lending performance is somewhat weaker than for small business lending. The weaker performance relates, in part, to the bank's strategy of focusing on lending to business enterprises, including large, small and non-profit businesses. Other factors affecting performance relate to the bank's strategic decision not to purchase home mortgage loans from other originators, acquire loans through mortgage brokers or offer "high cost" mortgage lending products. WBNA originates home mortgage loans through its internal delivery channels.

### **Conclusions for Area Receiving Full-Scope Review**

#### **Lending Activity**

Overall lending volume in South Carolina is good. There is a good volume of lending in the Greenville-Spartanburg MSA. Refer to Table 1 in the "State of South Carolina" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Reportable loans in the Greenville-Spartanburg MSA consist of 37% home purchase, 34% small loans to businesses, 26% home refinance, two percent home improvement, almost one percent CD and less than one percent each multi-family home and small loans to farm. Deposit market rank is two and deposit market share is 13%.

Home mortgage lending volume is adequate in the Greenville-Spartanburg MSA. Home improvement and multi-family home loan market ranks of seven and six are near to the deposit market rank. Home purchase loan market rank of 11 and home refinance market rank of 14 are below the deposit market rank.

Lending volume of small loans to businesses is good in the Greenville-Spartanburg MSA. Loan market rank of five is near to the deposit market rank. Lending volume of small loans to farms is good. Its loan market rank of six is near to the deposit market rank.

CD loan volume is excellent in the Greenville-Spartanburg MSA. The volume of CD loans represent 30% of Tier 1 Capital allocated to this MSA. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of CD loans.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good in South Carolina. A good geographic distribution is noted in the Greenville-Spartanburg MSA.

Refer to Tables 2, 3, 4 and 5 in the "State of South Carolina" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage and small business loan originations.

#### ***Home Mortgage Loans***

The geographic distribution of home purchase loans is poor in the Greenville-Spartanburg MSA. The percentages of loans are significantly below and well below the percentages of owner-occupied units in low-income and moderate-income geographies, respectively. Market share in low-income geographies is well below overall market share. In moderate-income geographies, market share exceeds overall market share.

The geographic distribution of home improvement loans is excellent in the Greenville-Spartanburg MSA. The percentages of loans in low- and moderate-income geographies exceed the percentages of owner-occupied units in those geographies, respectively. Market share in low-income geographies is significantly below overall market share. In moderate-income geographies, market share exceeds overall market share.

The geographic distribution of home refinance loans is adequate in the Greenville-Spartanburg MSA. The percentage of loans in low-income geographies is below the percentage of owner-occupied units therein. In moderate-income geographies, the percentage of loans is

significantly below the percentage of owner-occupied units. Market share in low-income geographies exceeds overall market share. In moderate-income geographies, market share is significantly below overall market share.

***Small Loans to Businesses***

The geographic distribution of small loans to businesses is good in the Greenville-Spartanburg MSA. The percentage of loans in low-income geographies exceeds the percentage of businesses in low-income geographies. In moderate-income geographies, the percentage of loans is below the percentage of businesses. Market share in low-income geographies exceeds overall market share. In moderate-income geographies, market share substantially meets overall market share.

***Lending Gap Analysis*** - Refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

***Inside/Outside Ratio*** - There is an excellent volume of reported loans within the defined AAs in the State of South Carolina. Excellent volume contributes positively to the bank's overall lending performance. Ninety-eight percent of home mortgage and ninety-nine percent of small business loans were originated within the AAs during the evaluation period. This analysis considered the volume of loans originated by the bank, and did not consider loan volume of affiliated companies.

**Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of loans is adequate in South Carolina. An adequate borrower distribution is noted in the Greenville-Spartanburg MSA.

Refer to Tables 7, 8, 9 and 10 in the "State of South Carolina" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations.

***Home Mortgage Loans***

The borrower distribution of home purchase loans is good in the Greenville-Spartanburg MSA. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families, while market share to low-income families exceeds overall market share. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Market share to moderate-income borrowers exceeds overall market share.

The borrower distribution of home improvement loans is excellent in the Greenville-Spartanburg MSA. The percentages of loans to both low- and moderate-income borrowers exceed the percentages of low- and moderate-income families, respectively. Market share to both income levels exceeds the overall market share.

The borrower distribution of refinance loans is adequate in the Greenville-Spartanburg MSA. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families. Market share to low-income borrowers is below the overall market share. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families. Market share substantially meets overall market share.

#### ***Small Loans to Businesses***

The borrower distribution of small loans to small businesses is adequate in the Greenville-Spartanburg MSA. The percentage of loans is below the percentage of small businesses. Market share is below overall market share.

#### **Community Development Lending**

CD lending in South Carolina is excellent and has a positive impact on overall lending performance. In the Greenville-Spartanburg MSA, CD lending performance is excellent. Refer to Table 1 in the "State of South Carolina" section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

Loan volume is excellent and responsive to CD needs in the Greenville-Spartanburg MSA. Over 41% of dollars support affordable housing needs. Over 550 affordable housing units were created and/or retained from these loans. Forty-eight percent of dollars support CD services targeted to low- and moderate-income individuals. The remaining 10% of investment dollars resulted in the retention of almost 1,500 jobs for low- and moderate-income individuals.

#### **Product Innovation and Flexibility**

The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. For details, refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation. Specific to the Greenville-Spartanburg MSA, the bank offers loan products in conjunction with the City of Greenville - Greenville Housing Futures, Greenville Urban League, and the Spartanburg County Homeownership Program. The bank also originated 16 guaranteed SBA loans, of which 12% is in low- and moderate-income geographies.

#### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Lending Test in the Charleston-North Charleston, Columbia, Florence and Sumter MSAs is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in South Carolina. The bank's performance in the Myrtle Beach MSA and SC Non-MSA AAs is weaker than the bank's overall performance in the state. Weaker performance is due to less favorable geographic and borrower distributions of loans. The overall Lending Test rating is not impacted by weaker performance because the combined MSA/AAs represent

a small percentage of the bank's deposits in the state. Refer to the Tables 1 through 11 in the "State of South Carolina" section of Appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in South Carolina is rated "Outstanding." Based upon a full-scope review, the bank's performance is excellent in the Greenville-Spartanburg MSA. Refer to Table 12 in the "State of South Carolina" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Conclusions for Area Receiving Full-Scope Review**

The volume of qualified investments is excellent in the Greenville-Spartanburg MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is five and one-half percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments supports this conclusion as well.

Current period activity in the Greenville-Spartanburg MSA includes investments totaling \$6.8 million provided in support of affordable housing programs. Total qualified investments for the MSA also includes \$3.4 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout WBNA geographic footprint.

Qualified investments demonstrate an adequate degree of responsiveness to identified CD needs considering there is a high level of investment opportunities available in the Greenville-Spartanburg MSA. Investments pertaining to affordable housing are responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

### **Conclusions for Areas Receiving Limited-Scope Review**

Based upon limited-scope reviews, the bank's performance under the Investment Test in the Charleston-North Charleston, Columbia, Florence, Myrtle Beach and Sumter MSAs and the SC Non-MSA AAs is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in South Carolina.

### **SERVICE TEST**

The bank's performance under the Service Test in South Carolina is rated "High Satisfactory." Based upon a full-scope review, the bank's performance in the Greenville-Spartanburg MSA is good.

Refer to Table 13 in the "State of South Carolina" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Positive consideration was given to bank-wide activities discussed under "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

## **Conclusions for Area Receiving Full-Scope Review**

### **Retail Banking Services**

In the Greenville-Spartanburg MSA, service delivery systems are accessible to geographies and individuals of different income levels.

The percentage of branches in low-income geographies exceeds the percentage of individuals residing in those geographies. The percentage of branches in moderate-income geographies is significantly lower than the percentage of moderate-income individuals living in those geographies. Hours and services do not vary in a way that inconveniences individuals throughout the MSA.

WBNA's record of opening and closing branches has generally not adversely affected the accessibility of service delivery systems.

One office was closed in a moderate-income geography during the evaluation period.

### **Community Development Services**

Community development service performance is excellent in the Greenville-Spartanburg MSA. WBNA is a leader in providing CD Services. During the evaluation period, bank officers provided numerous workshops and seminars regarding homebuyer education, basic credit education and small business technical assistance. They also provided technical assistance in obtaining affordable housing credit.

All of the aforementioned services met an identified need within the MSA.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Service Test in the Charleston-North Charleston and Myrtle Beach MSAs along with the SC Non-MSA AAs is stronger than the bank's overall "High Satisfactory" performance under the Service Test in South Carolina. The primary reason for stronger performance was better branch distributions. Performance in the aforementioned MSAs/AA was not sufficient to impact the Service Test rating as they make up about 20% of the deposits of the state. The remainder of the AAs receiving limited-scope reviews had performance that is not inconsistent with the bank's overall performance under the Service Test in South Carolina.

## State of Virginia

**CRA Rating for Virginia:** Outstanding

**The Lending Test is rated:**

Outstanding

**The Investment Test is rated:**

Outstanding

**The Service Test is rated:**

Satisfactory

High

The major factors that support these ratings include:

- Good lending volumes, good geographic and borrower distributions and CD lending performance that enhanced the overall Lending Test rating.
- An excellent level of qualified investments and good responsiveness to identified CD needs.
- Good access to delivery systems. Leadership in providing CD services also support the rating.

### Description of Institution's Operations in Virginia

WBNA is among the largest banking financial institutions in Virginia based on bank deposits originated in the state. Its deposit market rank is four and deposit market share is nine percent. Competitors and their market shares are SunTrust Bank 14%, First Union National Bank 11% and Bank of America, N. A. 10%. WBNA's primary focus in Virginia is lending to businesses with mortgage lending supplemented by WMC.

Virginia holds almost 21% of the bank's overall deposits and 21% of overall reported loans. Of overall bank reported loans, 25% small business, 18% home mortgage, 13% CD and nine percent small loans to farm are in the state.

There are many defined AAs in the State of Virginia. They consist of the major metropolitan areas of Norfolk-Virginia Beach-Newport News and Richmond-Petersburg. Other metropolitan areas are Charlottesville, Danville, Johnson City-Kingsport-Bristol, Lynchburg, Roanoke, and Washington D.C. AAs also include Non-MSAs located across the state. These include the counties and cities of Amelia, Appomattox, Franklin, Halifax, Louisa, Madison, Mecklenburg, Montgomery, Nelson, Orange, Prince Edward, Smyth, Harrisonburg, Radford, South Boston, Waynesboro City and Winchester City. Defined AAs in 1998 and 1999 also included the counties of Accomack, Augusta, Charlotte, Frederick, Henry, Lunenburg, Nottoway, Page, Pulaski, Rockbridge, Rockingham, Shenandoah, Southampton, Buena Vista, Franklin City, Lexington, Martinsville and Staunton City. Within its defined AAs, WBNA operates 195 branch offices and 265 ATMs.

In Virginia, reportable loans consist of 50% small loans to businesses, 49% home mortgage, almost one percent CD and less than

one percent small loans to farms. Farm lending is moderate. Of the 220 small loans to farms originated, nine percent were made in low- and moderate-income geographies in primarily rural areas across Virginia.

### **Scope of Evaluation in Virginia**

The State rating is based primarily on the bank's performance in the Norfolk-Virginia Beach-Newport News (Norfolk) and Richmond-Petersburg (Richmond) MSAs, the two selected for full-scope reviews and those holding the largest volume of deposits in the state. The Norfolk MSA accounts for 19% and the Richmond MSA accounts for 29% of state deposits, respectively. Norfolk holds the largest volume of loans with 23% of reported loans originated within the state. Richmond holds the second largest volume of loans with almost 21%. AAs receiving limited scope reviews were the Charlottesville, Danville, Johnson City-Kingsport-Bristol, Lynchburg, Roanoke and Washington, D.C. MSAs and VA Non-MSA AAs. VA Non-MSA AAs were analyzed on a combined basis for purposes of this evaluation. Refer to the market profiles for the "State of Virginia" in Appendix C for detailed demographics and other performance context information for MSAs that received full-scope reviews.

### **LENDING TEST**

The bank's overall performance under the Lending Test in the State of Virginia is rated "Outstanding." Based upon full-scope reviews, the bank's performance in the Norfolk and Richmond MSAs is excellent.

Home mortgage lending performance is somewhat weaker than for small business lending. The weaker performance relates, in part, to the bank's strategy of focusing on lending to business enterprises, including large, small and non-profit businesses. Other factors affecting performance relate to the bank's strategic decision not to purchase home mortgage loans from other originators, acquire loans through mortgage brokers or offer "high cost" mortgage lending products. WBNA originates home mortgage loans through its internal delivery channels.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### **Lending Activity**

The overall volume of lending in Virginia is good. Good lending volumes were noted in both the Norfolk and Richmond MSAs. Refer to Table 1 in the "State of Virginia" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

#### Norfolk MSA

Reportable loans consist of 54% small loans to businesses, 22% home refinance, 16% home purchase, six percent home improvement, one percent CD and less than one percent each of small loans to farms and

multi-family home loans. Deposit market rank is four and deposit market share is 14%.

Home mortgage lending volume is adequate. Home purchase loan market rank of 45, home improvement market rank of 15 and home refinance market rank of 25 are below or well below the deposit market rank.

Multi-family home loan market rank of six is near to the deposit market rank. Consideration is given to the fact that almost 500 lenders were vying for home mortgage loans in the Norfolk area during the evaluation period.

Lending volume of small loans to businesses is excellent. Loan market rank is four and meets the deposit market rank. Small farm lending volume is excellent. Loan market rank of two exceeds the deposit market rank.

CD loan volume is excellent. The volume of CD loans represent 32% of Tier 1 Capital allocated to this MSA. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of CD loans.

#### Richmond MSA

Reportable loans consist of 51% small loans to businesses, 24% home refinance, 15% home purchase, eight percent home improvement, less than two percent CD and less than one percent each multi-family home loans and small loans to farms. Deposit market rank is two and deposit market share is 15%.

Home mortgage lending volume is adequate. Home purchase loan market rank of 35, home improvement market rank of 10 and home refinance market rank of 14 are below or well below the deposit market rank.

Lending volume of small loans to businesses is good. Loan market rank of four is near to the deposit market rank. Lending volume of small loans to farms is excellent. Loan market rank of two meets the deposit market rank.

CD loan volume is excellent. CD loans represents 52% of Tier 1 Capital allocated to the MSA.

#### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good in Virginia.

Good geographic distributions were noted in the Norfolk and Richmond MSAs.

Refer to Tables 2, 3, 4 and 5 in the "State of Virginia" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage and small business loan originations.

## ***Home Mortgage Loans***

### *Norfolk MSA*

The geographic distribution of home purchase loans is adequate. The percentage of loans in low-income geographies is below the percentage of owner-occupied units in low-income geographies. In moderate-income geographies, the percentage of loans is significantly below the percentage of owner-occupied units. Market share in low-income geographies is below the overall market share. In moderate-income geographies, market share is significantly below overall market share.

The geographic distribution of home improvement loans is excellent. The percentages of loans in low- and moderate-income geographies exceed the percentages of owner-occupied units in those respective income levels of geographies. Market shares in low-income and moderate-income geographies exceed the overall market share.

The geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies is below the percentage of owner-occupied units therein. The percentage of loans in moderate-income geographies is well below the percentage of owner-occupied units in moderate-income geographies. Market share in low- and moderate-income geographies is below the overall market share.

### *Richmond MSA*

The geographic distribution of home purchase loans is poor. The percentage of loans in low-income geographies is significantly below and in moderate-income geographies is well below the percentages of owner-occupied units in each income level of geography, respectively. Market share in low-income geographies is significantly below the overall market share. In moderate-income geographies, market share substantially meets overall market share.

The geographic distribution of home improvement loans is excellent. The percentage of loans in low-income geographies is near to the percentage of owner-occupied units therein. In moderate-income geographies, the percentage of loans exceeds the percentage of owner-occupied units. Market share in low-income geographies is significantly below and in moderate-income geographies exceeds the overall market share.

The geographic distribution of home refinance loans is adequate. The percentage of loans in low-income geographies is well below the percentage of owner-occupied units therein. In moderate-income geographies, the percentage of loans exceeds the percentage of owner-occupied units. Market share in low-income geographies is well below the overall market share. In moderate-income geographies, market share exceeds overall market share.

## ***Small Loans to Businesses***

Norfolk MSA

The geographic distribution of small loans to businesses is good.

The percentages of loans in low- and moderate-income geographies are near to the percentages of businesses in each income level of geography, respectively. Market share in low- and moderate-income geographies exceeds the overall market share.

Richmond MSA

The geographic distribution of small loans to businesses is good.

The percentage of loans in low-income geographies is below the percentage of businesses therein. Market share in low-income geographies substantially meets overall market share. In moderate-income geographies, the percentage of loans is near to the percentage of businesses therein. Market share in moderate-income geographies exceeds the overall market share.

**Lending Gap Analysis** - Refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

**Inside/Outside Ratio** - There is an excellent volume of reported loans within its defined AAs in the State of Virginia. Excellent volume contributes positively to the bank's overall lending performance.

Eighty-four percent of home mortgage and ninety-seven percent of small loans to businesses were originated within the AAs during the evaluation period. This analysis considered the volume of loans originated by the bank, and did not consider loan volume of affiliated companies.

**Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of loans is good in Virginia. There is a good borrower distribution in the Norfolk MSA and an excellent borrower distribution in the Richmond MSA.

Refer to Tables 7, 8, 9 and 10 in the "State of Virginia" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations.

**Home Mortgage Loans**

Norfolk MSA

The borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers is significantly below the percentage of low-income families, while market share to low-income borrowers exceeds overall market share. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Market share to moderate-income borrowers exceeds overall market share.

The borrower distribution of home improvement loans is excellent.

The percentage of loans to low-income borrowers is near to the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income

families. Market share to low- and to moderate-income borrowers exceeds the overall market share.

The borrower distribution of refinance loans is good. The percentage of loans to low-income borrowers is well below the percentage of low-income families. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families. Market share to low- and moderate-income borrowers exceeds the overall market share.

#### Richmond MSA

The borrower distribution of home purchase loans is good. The percentage of loans to low-income borrowers is below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Market share to both income levels of borrowers exceeds the overall market share.

The borrower distribution of home improvement loans is excellent. The percentages of loans to low- and to moderate-income borrowers exceed the percentages of low- and moderate-income families, respectively. Market share to low- and to moderate-income borrowers exceeds the overall market share.

The borrower distribution of refinance loans is excellent. The percentage of loans to low-income borrowers is below the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Market share to each income level of borrower exceeds overall market share.

#### **Small Loans to Businesses**

The borrower distribution of small loans to small businesses is good in the Norfolk MSA and excellent in the Richmond MSA. The percentage of loans is near to and meets the percentage of small businesses in the Norfolk and Richmond MSAs, respectively. Market share exceeds its overall market share in each MSA, respectively.

#### **Community Development Lending**

CD lending in Virginia is excellent and has a positive impact on the bank's overall lending performance. CD lending is excellent in the Norfolk and Richmond MSAs. Refer to Table 1 in the "State of Virginia" section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.

#### Norfolk MSA

Loan volume is excellent and responsive to CD needs in the MSA. Fifty-five percent of dollars support affordable housing needs. About 1,970 affordable housing units were created and/or retained from these loans. Twenty-five percent of dollars support CD services. The remaining 20% of investment dollars support the creation and/or retention of jobs for low- and moderate-income individuals.

Richmond MSA

Loan volume is excellent and responsive to CD needs in the MSA. Forty-two percent of dollars support economic development including the creation and/or retention of jobs for low- and moderate-income people. The number of jobs is not readily available. Twenty-four percent of dollars support CD services and 20% support affordable housing needs. Over 650 affordable housing units were created and/or retained from those loans. The remaining 14% of loans support the revitalization and/or stabilization of low- and moderate-income geographies.

**Product Innovation and Flexibility**

The wide variety of flexible lending programs and occasional innovative lending practices contributes positively to the bank's overall lending performance. For details, refer to "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation. In Virginia, the bank established a partnership with the Virginia Housing Development Authority to offer FHA, Veteran's Administration (VA), and other flexible home loan products. Specific to the Norfolk MSA, the bank offers loan products in conjunction with the Old Huntersville Development Corporation, Portsmouth Community Development Group, Portsmouth Redevelopment and Housing Authority and the Village of Newport News. The bank also originated 28 guaranteed SBA loans, 14% of which are in moderate-income geographies. Specific to the Richmond MSA, the bank offers loan products in conjunction with Housing Opportunities Made Equal, Inc. The bank also originated 42 guaranteed SBA loans, 17% of which are in low-and moderate-income geographies.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Lending Test in the Charlottesville, Roanoke and Washington, D.C. MSAs and VA Non-MSA AAs is not inconsistent with the bank's overall "Outstanding" performance under the Lending Test in Virginia. The bank's lending performance in the Danville, Johnson City-Kingsport-Bristol and Lynchburg MSAs is weaker than the bank's overall performance in the state. In the Danville MSA, weaker performance is due to less favorable geographic and borrower distributions of loans.

In the Johnson City-Kingsport-Bristol MSA, weaker performance is due to a lower lending volume and a less favorable overall borrower distribution of loans. The overall Lending Test rating is not impacted because these weaker MSAs combined hold a small percentage of the bank's deposits in the state. Refer to the Tables 1 through 11 in the "State of Virginia" section of Appendix D for the facts and data that support these conclusions.

**INVESTMENT TEST**

The bank's performance under the Investment Test in Virginia is rated "Outstanding." Based upon full-scope reviews, the bank's performance is excellent in the Norfolk and Richmond MSAs. Refer to

Table 12 in the "State of Virginia" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Conclusions for Areas Receiving Full-Scope Reviews**

#### Norfolk MSA

The volume of qualified investments is excellent in the MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is almost seven percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments as well as unfunded commitments supports this conclusion as well.

Current period activity includes investments totaling \$8.5 million provided in support of affordable housing programs. Total qualified investments also include \$3.3 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout WBNA's footprint. The remaining activity included 51 grants and contributions to 37 organizations providing community services to low- and moderate-income MSA residents.

Qualified investments demonstrate a good degree of responsiveness to identified CD needs considering there is a high level of investment opportunities available in the MSA. Investments pertaining to affordable housing and small business credit are especially responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

#### Richmond MSA

The volume of qualified investments is excellent in the MSA. The volume of total investments as a percentage of Tier 1 Capital allocated to this MSA is five percent. The volume, as a percentage of Tier 1 Capital, helps to gauge the extent of qualified investments. The continuing impact of prior period investments as well as unfunded commitments supports this conclusion as well.

Current period activity includes investments totaling \$10.8 million provided in support of affordable housing programs. Total qualified investments also include \$3.7 million representing an allocation of a group of investments that benefit all of the bank's AAs. These allocated qualified investments primarily support a SBIC pursuing economic development objectives throughout WBNA's footprint.

Qualified investments demonstrate a good responsiveness to identified CD needs considering there is a high level of investment opportunities available in the MSA. Investments pertaining to affordable housing and small business credit are especially responsive to CD needs. The bank's tax credit investments also exhibited complex features for reasons mentioned previously in the Augusta-Aiken MSA Investment Test narrative.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Investment Test in the Charlottesville, Danville, Johnson City-Kingsport-Bristol, Lynchburg, Roanoke, and Washington D.C. MSAs and the VA Non-MSA AAs is not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in Virginia.

## **SERVICE TEST**

The bank's performance under the Service Test in Virginia is rated "High Satisfactory." Based upon full-scope reviews, the bank's performance in the Norfolk and Richmond MSAs is good.

Refer to Table 13 in the "State of Virginia" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Positive consideration was given to bank-wide activities discussed under "Information Applicable to All Geographic Areas" found earlier in this Public Evaluation.

## **Conclusions for Areas Receiving Full-Scope Reviews**

### **Retail Banking Services**

#### Norfolk MSA

Service delivery systems are accessible to geographies and individuals of different income levels. The percentage of branches in low-income geographies is lower than the percentage of individuals residing in those geographies. The percentage of branches in moderate-income geographies is near the percentage of moderate-income individuals living in like geographies. WBNA's hours and services do not vary in a way that inconveniences individuals throughout the MSA.

WBNA's record of opening and closing branches improved the accessibility of delivery systems particularly in low- and moderate-income geographies. Due to significant merger activity during the evaluation period, WBNA opened a significant number of branches in low- and moderate-income geographies.

#### Richmond MSA

Service delivery systems are accessible to geographies and individuals of different income levels. The percentage of branches in low-income geographies is lower than the percentage of individuals living in those geographies. The percentage of branches in moderate-income geographies is near the percentage of moderate-income individuals residing in like geographies. WBNA's hours and services do not vary in a way that inconveniences individuals throughout the MSA.

WBNA's record of opening and closing branches improved the accessibility of delivery systems particularly in low- and moderate-income geographies. Due to significant merger activity during the evaluation period, WBNA opened a considerable number of branches in low- and moderate-income geographies.

### **Community Development Services**

Community development service performance is excellent in both the Norfolk and Richmond MSAs. WBNA is a leader in providing CD services in both MSAs. In the Norfolk MSA, WBNA provided many seminars regarding credit education and technical assistance for both consumers and small businesses. One bank officer serves as President and Chairman of the Executive Committee of the Greater Norfolk Corporation. The organization's efforts include downtown and neighborhood revitalization, transportation issues, education, and economic development. In the Richmond MSA, WBNA provided many seminars and workshops involving credit education and technical assistance to small businesses and consumers. In addition, a WBNA officer is a member of the Advisory Committee of the Virginia Community Development Fund, a CD financial institution in Richmond. The officer was instrumental in providing technical assistance in developing a sound loan policy for the organization.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based upon limited-scope reviews, the bank's performance under the Service Test in the Charlottesville and Washington, D.C. MSAs and the VA Non-MSA AAs is stronger than the bank's overall "High Satisfactory" performance under the Service Test in Virginia. The primary reason for the stronger performance is better branch distributions. Performance in the aforementioned AAs did not affect the bank's overall performance under the Service Test in Virginia as these areas represent only about one-third of the deposits in the state. In the remainder of the limited-scope MSAs, performance under the Service Test is not inconsistent with the bank's overall performance under the Service Test in Virginia.

## Appendix A: Scope of Evaluation

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 non-metropolitan areas that received comprehensive review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

Time Period Reviewed	<b>Lending Test: 01/01/98 through 12/31/00</b> <b>Investment Test: 01/01/98 through 12/31/00</b> <b>Service Test: 01/01/98 through 12/31/00</b>	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Wachovia Bank, N. A. (WBNA) Winston-Salem, North Carolina		Home purchase, home improvement, home refinance, multi-family home, small business, small farm and CD loans; CD related investments and services; retail banking services.
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Wachovia Capital Markets, Inc. (WCM)	Holding Company Subsidiary	CD related equity investments.
Wachovia Community Development Corporation (WCDC)	Holding Company Subsidiary	CD loans and equity investments.
Wachovia Foundation, Inc. (WFI)	Holding Company Subsidiary	CD related grants and contributions.
Wachovia Mortgage Company (WMC)	Subsidiary of Wachovia Bank, N.A.	Home purchase, home improvement, home refinance, and multi-family home loans.
<b>List of AAs and Type of Review</b>		
<b>MSA/AA and MSA Number(#)</b>	<b>Type of Review</b>	<b>Other Information</b>
Augusta-Aiken, GA-SC Multi-state MSA #0600	Full-Scope	Counties of Columbia and Richmond, GA; and Aiken and Edgefield, SC
Charlotte-Gastonia-Rock Hill, NC-SC Multi-state MSA #1520	Full-Scope	Counties of Cabarrus, Gaston, Mecklenburg, Rowan and Union, NC; and York, SC
<b>State of Florida</b>		
Fort Lauderdale MSA #2680	Limited-Scope	
Fort Pierce-Port St. Lucie MSA #2710	Limited-Scope	County of Martin
Jacksonville MSA #3600	Limited-Scope	County of Duval
Melbourne-Titusville-Palm Bay MSA #4900	Limited-Scope	
Orlando MSA #5960	Limited-Scope	County of Orange
Pensacola MSA #6080	Limited-Scope	County of Escambia
Tampa-St. Petersburg-Clearwater MSA #8280	Limited-Scope	County of Hillsborough
West Palm Beach-Boca Raton MSA #8960	Full-Scope	

MSA/AA and MSA Number(#)	Type of Review	Other Information
<b>State of Georgia</b>		
Athens MSA #0500	Limited-Scope	County of Clarke
Atlanta MSA #0520	Full-Scope	Counties of Bartow, Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Newton, Rockdale and Walton
Macon MSA #4680	Limited-Scope	
Savannah MSA #7520	Limited-Scope	
GA Non-MSA AA	Limited-Scope	Counties of Bulloch, Gordon, Hall, Lumpkin, Sumter and Whitfield
<b>State of North Carolina</b>		
Asheville MSA #0480	Limited-Scope	
Fayetteville MSA #2560	Limited-Scope	
Goldensboro MSA #2980	Limited-Scope	
Greensboro--Winston-Salem--High Point MSA #3120	Full-Scope	Counties of Alamance, Davidson, Forsyth, Guilford and Randolph
Greenville MSA #3150	Limited-Scope	
Hickory-Morganton-Lenoir MSA #3290	Limited-Scope	Counties of Burke and Catawba
Jacksonville MSA #3605	Limited-Scope	
Raleigh-Durham-Chapel Hill MSA #6640	Full-Scope	Counties of Durham, Johnston, Orange and Wake
Rocky Mount MSA #6895	Limited-Scope	
Wilmington MSA #9200	Limited-Scope	County of New Hanover
NC Non-MSA AA	Limited-Scope	Counties of Beaufort, Bladen, Carteret, Cherokee, Craven, Dare, Graham, Greene, Haywood, Henderson, Hertford, Iredell, Jackson, Lee, Lenoir, Macon, Martin, Moore, Pamlico, Pasquotank, Robeson, Rockingham, Scotland, Stanly, Watauga, Wilkes and Wilson
<b>State of South Carolina</b>		
Charleston-North Charleston MSA #1440	Limited-Scope	
Columbia MSA #1760	Limited-Scope	
Florence MSA #2655	Limited-Scope	
Greenville-Spartanburg MSA #3160	Full-Scope	
Myrtle Beach MSA #5330	Limited-Scope	
Sumter MSA #8140	Limited-Scope	
SC Non-MSA AA	Limited-Scope	Counties of Abbeville, Bamberg, Beaufort, Calhoun, Chesterfield, Colleton, Darlington, Dillon, Fairfield, Georgetown, Greenwood, Kershaw, Lancaster, Laurens, Marion, Marlboro, Newberry, Oconee, Orangeburg and Union
<b>State of Virginia</b>		
Charlottesville MSA #1540	Limited-Scope	
Danville MSA #1950	Limited-Scope	
Johnson City-Kingsport-Bristol MSA #3660	Limited-Scope	County of Washington
Lynchburg MSA #4640	Limited-Scope	
Norfolk-Virginia Beach-Newport News MSA #5720	Full-Scope	Counties of Gloucester, Isle of Wight, James City and York. Cities of Chesapeake, Hampton, Newport News, Norfolk, Poquoson, Portsmouth, Suffolk, Virginia Beach and Williamsburg

Wachovia Bank, N.A.

Charter Number: 1559

<b>MSA/AA and MSA Number(#)</b>	<b>Type of Review</b>	<b>Other Information</b>
Richmond-Petersburg MSA #6760	Full-Scope	Counties of Chesterfield, Goochland, Hanover, Henrico, and Powhatan. Cities of Colonial Heights, Hopewell, Petersburg and Richmond
Roanoke MSA #6800	Limited-Scope	
Washington, DC MSA #8840	Limited-Scope	Counties of Arlington, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford and Warren. Cities of Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas and Manassas Park
VA Non-MSA AA	Limited-Scope	Counties of Amelia, Appomattox, Franklin, Halifax, Louisa, Madison, Mecklenburg, Montgomery, Nelson, Orange, Prince Edward, and Smyth. Cities of Harrisonburg, Radford, South Boston, Waynesboro and Winchester

## Appendix B: Component Test/Composite Ratings Chart

This table identifies the points used for each component test rating and how they relate to the resulting composite rating. This process, as outlined in the *Comptroller's Handbook - CRA Examination Procedures*, is applied when a bank has branches in two or more states and in Multi-state MSAs.

Component Test Ratings	Lending	Investment	Service
Outstanding	12 points	6 points	6 points
High Satisfactory	9 points	4 points	4 points
Low Satisfactory	6 points	3 points	3 points
Needs to Improve	3 points	1 point	1 point
Substantial Noncompliance	0 points	0 points	0 points
<b>Composite Rating</b>	The composite rating results from the sum of the numerical values of the component test ratings for the Lending, Investment and Service Tests.		
Outstanding Record of Meeting Community Credit Needs	20 or more points		
Satisfactory Record of Meeting Community Credit Needs	11-19 points		
Needs to Improve Record of Meeting Community Credit Needs	5-10 points		
Substantial Noncompliance Record of Meeting Community Credit Needs	0-4 points		

## **Appendix C: Market Profiles for Full-Scope Areas**

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**Augusta-Aiken MSA**

Demographic Information for Full-Scope Area: Augusta-Aiken MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	84	9.52	14.29	46.43	28.57	1.19
Population by Geography	395,065	6.72	13.83	51.28	28.17	0.00
Owner-Occupied Housing by Geography	94,470	4.43	11.94	51.43	32.20	0.00
Businesses by Geography	13,684	8.20	18.94	37.37	35.49	0.00
Farms by Geography	391	1.50	21.00	43.00	34.50	0.00
Family Distribution by Income Level	105,275	21.31	16.73	21.47	40.49	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	40,048	12.57	19.76	52.95	14.72	0.00
Median Family Income		Median Housing Value				= \$ 63,670
HUD Adjusted Median Family Income for 2000	= \$ 33,051	Unemployment Rate				= 3.56%
Households Below the Poverty Level	= 15.26%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Augusta-Aiken MSA AA includes a portion of the Augusta-Aiken Multi-state MSA and includes the counties of Columbia and Richmond in Georgia and Aiken and Edgefield in South Carolina. Within the defined AA, the bank operates nine branch offices and 22 ATMs. The Augusta-Aiken MSA represents less than one percent of the total bank deposits.

WBNA is among the largest banks operating in the Augusta-Aiken Multi-state MSA based on bank deposits originated therein. Its deposit market rank is four and deposit market share is almost 10%. Major competitors and their deposit market shares include Regions Bank 16%, Bank of America, N.A. 15% and First Union National Bank 14%. They service the MSA with 51 branch offices combined. Mortgage loan competitors include Augusta Mortgage and Professional Lending.

The Augusta-Aiken MSA reflected a vibrant economy. The Bureau of Labor Statistics reported the December 2000 unemployment rate low at 3%. Employment was concentrated in the areas of wholesale and retail trade, services, government and manufacturing.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials. One organization was also contacted during this evaluation. Identified credit and credit-related needs include: affordable owner-occupied and rental housing, small business credit education, small business technical assistance programs,

and the revitalization of certain areas in the city of Augusta. These sources revealed a moderate level of opportunities for financial institutions to aid in meeting the credit needs of the community. Examples of ways financial institutions can aid in meeting these needs are by offering affordable housing lending products, providing banking services in areas servicing the low-income population and by working with:

- Local groups in providing comprehensive homebuyers counseling programs.
- Established community-based organizations to implement needed projects in the area.
- A local minority business center to assist small businesses in the loan application process.
- Established organizations in their efforts to revitalize portions of Augusta.

**Charlotte MSA**

Demographic Information for Full-Scope Area: Charlotte MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	250	6.00	23.20	50.80	18.80	1.20
Population by Geography	1,111,774	3.12	17.63	56.79	22.46	0.00
Owner-Occupied Housing by Geography	279,769	0.89	14.11	59.32	25.68	0.00
Businesses by Geography	55,430	6.15	20.33	49.11	24.18	0.23
Farms by Geography	1,450	1.38	12.00	66.21	20.34	0.07
Family Distribution by Income Level	304,501	18.58	18.09	24.41	38.92	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	111,639	6.00	26.40	57.55	10.04	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$36,307 = \$ 57,100 = 10.19%	Median Housing Value Unemployment Rate (July 2000)				= \$ 77,367 = 3.3%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Charlotte MSA AA includes a portion of the Charlotte-Gastonia-Rock Hill Multi-state MSA and includes the counties of Cabarrus, Gaston, Mecklenburg, Rowan and Union in North Carolina and York in South Carolina. Within the defined AA, it operates 35 branch offices and 77 ATMs. The Charlotte MSA represents five percent of total bank deposits.

WBNA is among the top four banking financial institutions operating in the Charlotte MSA based on bank deposits originated therein. Its deposit market rank is four and deposit market share is four percent. Major competitors and their market shares include Bank of America, N.A. 57%, First Union National Bank 18%, and Branch Banking and Trust Company (BB&T) 5%. The three banks service the MSA with 172 branch offices combined. Mortgage loan competitors include Wells Fargo Mortgage Company and Myers Park Mortgage Company.

The Charlotte MSA reflected a thriving economy. The Bureau of Labor Statistics reported the July 2000 unemployment rate was low at 3%. Employment was concentrated in the areas of services, wholesale and retail trade and manufacturing.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials. We also used information from the Charlotte 2000 Consolidated Plan. Identified credit and credit-related needs include: affordable owner-

occupied and rental housing, small business credit education and technical assistance programs, more flexibility in lending programs for immigrants with little or no credit history, small business credit and consumer credit for low- and moderate-income residents.

These sources revealed a high level of opportunities for financial institutions to aid in meeting the credit needs of the community.

Examples of ways financial institutions can aid in meeting these needs are working with:

- Various non-profit organizations to aid in meeting the small business credit and education needs.
- Non-profit organizations to offer credit to low- and moderate-income individuals with little or no credit history.
- A local consortium to provide affordable home loan financing.
- Non-profit organizations to educate consumers regarding credit.

**STATE OF FLORIDA**

**West Palm Beach MSA**

Demographic Information for Full-Scope Area: West Palm Beach MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	211	4.74	21.33	41.23	30.81	1.90
Population by Geography	863,518	3.05	21.73	46.83	28.15	.24
Owner-Occupied Housing by Geography	262,894	.94	20.87	46.30	31.90	0.00
Businesses by Geography	53,528	2.56	19.13	43.21	34.08	1.02
Farms by Geography	1,927	3.01	11.65	50.70	28.54	0.10
Family Distribution by Income Level	244,633	18.84	19.04	22.60	39.52	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	92,666	5.05	32.60	46.64	15.72	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$38,539 = \$ 56,600 = 8.64%	Median Housing Value Unemployment Rate (July 2000)				= \$135,973 = 5.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The West Palm Beach MSA AA has 12 branches, 15 ATMs and consists of the entire West Palm Beach-Boca Raton MSA. The MSA has one county, Palm Beach. There is also a workplace ATM and an ATM located at a local college. The West Palm Beach MSA represents one and one-half percent of total bank deposits.

WBNA holds the number 12 deposit market rank with three percent of the total market deposits. The banks ranked one through eleven hold a total deposit market share of 79% serviced by 308 branch offices

During the evaluation period, the West Palm Beach MSA reflected a thriving economy. The Bureau of Labor Statistics reported the July 2000 unemployment rate at 5%. Employment was concentrated in the areas of service and wholesale and retail trade.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials. Information from the revised August 1999 Comprehensive Plan was also reviewed. Identified credit and credit-related needs include: job training for the unemployed, permanent housing for the immigrant population, single family housing, home rehabilitation, construction and permanent lending, small business lending including micro loans, business credit, down payment assistance, and affordable rental and owner-occupied housing. These sources revealed a moderately high level of opportunities

for financial institutions to aid in meeting the credit needs of the community. Examples of these opportunities include becoming involved in business lending and working with:

- Consortiums and CDCs to provide financing for CD projects.
- A local non-profit organization to provide education and training for homeowners.
- Various local municipalities in providing affordable mortgage loans, micro business loans and technical assistance to prospective micro loan business borrowers.

**STATE OF GEORGIA**

**Atlanta MSA**

Demographic Information for Full-Scope Area: Atlanta MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	457	13.35	19.69	37.86	28.01	1.09
Population by Geography	2,694,454	6.76	17.00	44.33	31.91	0.00
Owner-Occupied Housing by Geography	624,375	3.12	13.26	44.68	38.94	0.00
Businesses by Geography	144,364	4.64	13.74	42.75	38.87	0.00
Farms by Geography	2,617	2.10	11.00	49.37	37.53	0.00
Family Distribution by Income Level	710,219	18.65	17.67	23.43	40.25	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	257,950	13.06	26.19	44.86	15.89	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$ 44,200 = \$ 63,100 = 9.63%	Median Housing Value Unemployment Rate (July 2000)				= \$ 100,278 = 3.1%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Atlanta MSA AA has 99 branch offices, 203 ATMs and consists of a portion of the Atlanta MSA. The AA includes the counties of: Bartow, Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Newton, Rockdale, and Walton. The Atlanta MSA AA represents 20% of total bank deposits.

WBNA holds the number three deposit market rank with 15% of the total market deposits. Two larger multi-state banks holding the first and second largest deposit market shares had a combined share of 34% serviced by 331 offices. Banks holding the numbers three through six in market share have a combined market share of 24% serviced by 200 offices.

The Atlanta MSA had a thriving diverse economy. The Bureau of Labor Statistics report the July 2000 unemployment rate at 3%. Employment concentrations within the area included retail and wholesale trade, services and government.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials. We also reviewed the City of Atlanta's 2000-2004 Consolidated Plan. Credit and credit-related needs identified include: affordable owner-occupied and rental housing, credit education, revolving loan funding for home improvement credit, small business credit and consumer credit for low- and moderate-income residents. From

these sources, we identified a high level of opportunities for participation by local institutions. Examples of these opportunities include participating with a local non-profit entity in a small business loan fund, participating with a local non-profit entity in educational support for small businesses and opportunities include working with:

- A local non-profit agency through financial, educational and technical support in helping residents obtain affordable housing.
- A local CDC to provide small housing rehabilitation loans to residents.
- Local CD organizations to provide affordable housing credit.
- A local university to provide credit to small business involved in trade activities.
- Local government to provide affordable housing credit in conjunction with down payment assistance and second mortgage subsidy programs.

**STATE OF NORTH CAROLINA**

**Greensboro--Winston-Salem MSA**

Demographic Information for Full-Scope Area: Greensboro--Winston-Salem MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	241	4.15	19.50	54.36	21.58	0.41
Population by Geography	954,734	3.23	15.06	60.07	21.64	0.00
Owner-Occupied Housing by Geography	251,024	1.03	10.92	62.97	25.08	0.00
Businesses by Geography	42890	2.28	21.74	54.24	21.67	0.00
Farms by Geography	1,171	0.34	10.67	67.55	21.43	0.00
Family Distribution by Income Level	266,554	18.50	18.34	24.62	38.54	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	98,203	5.98	21.67	61.18	11.17	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$ 34,869 = \$ 51,000 = 10.93%	Median Housing Value Unemployment Rate (July 2000)				= \$ 73,478 = 5.4%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Greensboro--Winston-Salem MSA AA has 38 branch offices, 102 ATMs and consists of a portion of the Greensboro--Winston-Salem-High Point MSA. The AA includes the following counties: Alamance, Davidson, Forsyth, Guilford and Randolph. The Greensboro--Winston-Salem MSA represents 14% of total bank deposits.

WBNA holds the number two market rank with a 28% deposit market share. The bank holding the number one deposit market share is a large multi-state bank with a 29% deposit market share serviced by 43 offices. The banks with the numbers three through five market shares had a combined market share of 19.8% serviced by 111 offices.

The Greensboro--Winston-Salem MSA has a thriving diverse economy. The Bureau of Labor Statistics reported a July 2000 unemployment rate of 5%. Employment concentrations within the area consist of services, wholesale and retail trade, and government.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials. The following credit and credit-related needs were identified: credit counseling, affordable mortgage credit with flexible underwriting standards, affordable

housing rehabilitation credit, and small business credit including start-up financing. From these contacts we determined that a high level of opportunities exist for participation by local financial institutions. Examples of opportunities include working with a government agency in providing financing for affordable apartments and condominiums, and working with the local municipality in financing affordable housing and providing micro-business loans. Other opportunities include working with local community organizations in providing credit education, construction and permanent financing for affordable homes, and working with a local agency in providing housing credit for first-time home buyers.

### Raleigh-Durham MSA

Demographic Information for Full-Scope Area: Raleigh-Durham MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	181	8.84	20.99	39.23	27.07	3.87
Population by Geography	780,372	6.17	19.31	44.47	29.40	0.65
Owner-Occupied Housing by Geography	181,323	1.37	17.47	47.06	34.10	0.00
Businesses by Geography	41,047	3.27	16.58	47.72	31.31	1.12
Farms by Geography	1,389	0.43	25.77	52.41	21.17	0.22
Family Distribution by Income Level	201,720	18.68	17.43	24.42	39.47	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	72,843	9.18	31.42	45.13	14.27	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$ 39,723 = \$ 62,800 = 11.12%	Median Housing Value Unemployment Rate (August 2000)				= \$ 92,088 = 1.6%

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Raleigh-Durham MSA AA has 31 branch offices, 120 ATMs and consists of the following counties within the Raleigh-Durham-Chapel Hill MSA: Durham, Johnston, Orange and Wake. The Raleigh-Durham MSA represents six percent of total bank deposits.

WBNA holds the number one deposit market rank with 19% deposit market share. Large multi-state banks with the number two through eight market shares had a combined market share of almost 71% serviced by 247 offices.

The Raleigh-Durham MSA reflected a thriving economy. The Bureau of Labor Statistics reported the August 2000 unemployment rate as very low at 1.6% and had remained near that level for the previous five months. Employment was concentrated in the areas of government, services and wholesale and retail trade.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials.

The Raleigh 2000-2005 Consolidated Plan was also reviewed. Identified credit and credit-related needs include: affordable housing loans, credit education, housing improvement and small business loans. Through these sources of information we found that there was a moderately high level of opportunities for participation by local financial institutions. Examples of opportunities include providing funding to a local revolving fund which provides developers with credit to rehabilitate multi-family housing, and working with:

- A local municipality to provide financing for affordable rental housing and affordable multi-family housing.
- A local municipality to provide interim and gap financing to nonprofit organizations for development of affordable housing.
- A local municipality to provide financing for first time homebuyers.
- Non profit organizations to provide first time homebuyers counseling and credit education for renters.
- A local non-profit economic development organization in the development of affordable housing projects.

**STATE OF SOUTH CAROLINA**

**Greenville-Spartanburg MSA**

Demographic Information for Full-Scope Area: Greenville-Spartanburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	207	4.83	18.36	57.49	18.36	0.96
Population by Geography	830,563	2.05	15.72	60.28	21.93	0.02
Owner-Occupied Housing by Geography	218,820	0.82	13.32	63.63	22.23	0.00
Businesses by Geography	33,478	5.78	15.14	54.40	24.12	0.56
Farms by Geography	773	1.42	11.90	68.95	17.59	0.13
Family Distribution by Income Level	230,147	19.47	17.94	23.79	38.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	86,102	3.57	23.04	61.92	11.47	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$ 32,471 = \$ 48,700 = 12.97%	Median Housing Value Unemployment Rate (August 2000)				= \$ 59,815 = 3.2%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Greenville-Spartanburg MSA AA has 30 branch offices, 57 ATMs and consists of all counties in the Greenville-Spartanburg-Anderson MSA: Anderson, Cherokee, Greenville, Pickens, and Spartanburg. The Greenville-Spartanburg MSA represents four percent of total bank deposits.

WBNA holds the number two market rank in the AA with 13% of the total market deposits. The bank holding the number one market share had 14% of the total deposits serviced by 34 offices. Financial institutions with the third through sixth market ranks had a total deposit market share of almost 37% serviced by 112 offices.

The Greenville-Spartanburg MSA reflected a thriving economy. The Bureau of Labor Statistics reported the August 2000 the unemployment rate was low at 3%. Employment concentrations within the area included wholesale and retail trade, manufacturing, and services.

We used information from various community leaders obtained by the various federal bank regulators as well as our own contacts, to aid us in assessing community credit needs. We also used information from the Consolidated Plans from the various municipalities within the MSA. Identified credit and credit-related needs within the

community included home mortgage loan down payment assistance, home improvement loans and consumer credit education and technical assistance to small businesses. There is a moderate to high level of opportunities for participation by local financial institutions. Examples of opportunities include:

- Working with a local non-profit organization to provide financing for housing projects.
- Creating economic opportunity in Community Development Block Grant (CDBG) rehabilitation neighborhoods with the support from the banking community.
- Providing credit counseling and budget management to tenants through existing programs and services.
- Developing an in-school education program that would teach middle and high school students the importance of personal finance.
- Providing credit counseling and budget management to tenants through existing programs and services.
- Providing home rehabilitation loan assistance.
- Working with private developers to increase low- and moderate-income housing projects.
- Providing second mortgages, down payment assistance, and closing costs for low-income and first time homebuyers.
- Intensify marketing and support of homeownership through the banking community, media, and community-based agencies.
- Working with local lenders to increase the marketing of loan products to the minority and low-income communities by recommending a quarterly report detailing the available programs.

**STATE OF VIRGINIA****Norfolk MSA**

Demographic Information for Full-Scope Area: Norfolk MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	334	9.28	20.36	40.12	23.05	7.19
Population by Geography	1,421,160	6.39	17.47	48.59	25.72	1.83
Owner-Occupied Housing by Geography	297,886	2.76	11.16	52.28	33.80	0.00
Businesses by Geography	45,318	3.87	15.85	49.31	30.53	0.44
Farms by Geography	1,116	0.94	8.23	56.26	34.48	0.09
Family Distribution by Income Level	368,585	18.62	18.92	24.01	38.45	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	138,361	12.15	25.86	48.67	13.32	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$ 35,627 = \$ 49,300 = 11.24%	Median Housing Value Unemployment Rate				= \$ 88,673 = 2.73%

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Norfolk MSA AA has 52 offices, 78 ATMs and consists of the following Virginia counties/cities in the Norfolk-Virginia Beach-Newport News MSA: Gloucester, Isle of Wight, James City, York, Chesapeake, Hampton, Newport News, Norfolk, Poquoson, Portsmouth, Suffolk, Virginia Beach and Williamsburg. The Norfolk MSA represents four percent of total bank deposits.

WBNA holds the number four deposit market rank with 14% of the total deposit market. The top three financial institutions are all multi-state banks with a combined market share of 45% serviced by 124 offices.

The Norfolk MSA reflected a thriving diversified economy. The Bureau of Labor Statistics reported the September 2000 unemployment rate at 3%. Employment was concentrated in the areas of services, wholesale and retail trade, and government.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials. We also used information from the Consolidated Plans from the various municipalities within the MSA. The most pressing identified credit needs included affordable housing loans, housing rehabilitation loans, small business loans and

consumer credit education. We determined there is a moderate level of opportunities for participation by local financial institutions. Opportunities include providing support to local nonprofit CD housing organizations by providing low interest rate mortgage loans, homebuyers' seminars to consumers and financial support to the nonprofit organizations and include working with:

- Local municipalities in financing the purchase of affordable housing.
- Local nonprofit organizations in financing the acquisition or rehabilitation of affordable housing.
- Local nonprofit organizations to provide credit education for first time homebuyers.

**Richmond MSA**

Demographic Information for Full-Scope Area: Richmond, VA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	236	8.90	21.19	41.10	21.61	7.20
Population by Geography	800,559	7.28	20.48	43.79	28.30	0.15
Owner-Occupied Housing by Geography	198,950	3.79	15.00	47.19	34.02	0.00
Businesses by Geography	33,020	6.56	19.14	45.23	27.55	1.52
Farms by Geography	725	2.07	9.79	52.41	35.59	0.14
Family Distribution by Income Level	212,571	19.17	17.95	24.41	38.47	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	78,911	14.55	30.81	41.23	13.41	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$ 41,494 = \$ 59,500 = 9.91%	Median Housing Value Unemployment Rate (July 2000)				= \$ 82,840 = 2.1%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Richmond MSA AA has 42 branch offices, 61 ATMs and consists of the following Virginia counties/cities in the Richmond-Petersburg MSA: Chesterfield, Goochland, Hanover, Henrico, Powhatan, Colonial Heights, Hopewell, Petersburg and Richmond. The Richmond MSA represents six percent of total bank deposits.

WBNA holds a number two deposit market rank with 15% of the total deposit market. A larger multi-state bank holds the number one market share with 21% of the deposit market serviced by 51 offices. The institutions with the numbers three through five

market ranks have a total deposit market share of 38% serviced by 83 offices.

The Richmond MSA reflected a thriving diversified economy. The Bureau of Labor Statistics reported a low July 2000 unemployment rate of 2%. Employment was concentrated in the areas of services, wholesale and retail trade, and government.

Community credit needs were identified by reviewing a variety of contacts conducted by the various federal financial regulatory agencies with community-based organizations and public officials.

We also used information from the City of Richmond Consolidated Plan. The most pressing credit and credit-related needs in the community include: affordable owner-occupied and rental housing, credit education, small and start-up business credit and consumer credit for low- and moderate-income residents. Through these information sources we found that there is a high level of opportunities for participation by local financial institutions. They include:

- Working with a local non-profit organization to aid in providing credit to small businesses.
- Participating in a loan pool for small businesses sponsored by a local municipality.
- Providing affordable housing loans for low- and moderate-income residents.
- Partnering with a local CDFI in providing credit for the construction of affordable housing as well as credit for the purchase of affordable housing.
- Working with a local CDC to provide financing and technical assistance for the funding of low- and moderate-income multi-family rental properties.
- Working with local government to aid in providing Capital to start-up small businesses.

## Appendix D: Tables of Performance Data

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#### Tables of Performance Data

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## **Content of Standardized Tables**

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A separate set of tables is provided for each state. All Multi-state Metropolitan Areas are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Evaluation). For purposes of reviewing the Lending Test tables, the following are applicable: Purchased loans are treated as originations and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/AA.

The following is a listing and brief description of the tables included in each set:

**Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/AA.

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated 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 description for Table 2.

**Table 4. Geographic Distribution of Refinance Loans** - See description for Table 2.

**Table 5. 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 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.

**Table 6. 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 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.

**Table 7. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/AA. The table also presents market share information based on the most recent aggregate market data available.

**Table 8. Borrower Distribution of Home Improvement Loans** - See description for Table 7.

**Table 9. Borrower Distribution of Refinance Loans** - See description for Table 7.

**Table 10. 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 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 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 11. 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 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 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the call reports as an off-balance-sheet item.

**Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

**Table 1. Lending Volume**

LENDING VOLUME		Multi-state Metropolitan Areas						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope Review:												
Augusta-Aiken, GA-SC MSA	100.00	651	73,533	464	42,188	5	390	17	6,607	1,137	122,718	100.00
Charlotte-Gastonia-Rock Hill, NC-SC MSA	100.00	3,335	614,938	2,017	217,922	11	1,020	100	148,748	5,463	982,628	100.00

(\*) Rated area refers to either the state or Multi-state MSA rating area.

(\*\*) The evaluation period for Community Development Loans is January 1, 1998 to December 31, 2000.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or Multi-state MSA rating area.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Multi-state Metropolitan Areas						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	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	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Augusta-Aiken, GA-SC MSA	330	100.0	4.43	0.91	11.94	6.06	51.43	31.82	32.20	61.21	1.00	0.9	0.88	0.82	1.12
Charlotte-Gastonia-Rock Hill, NC-SC MSA	2,034	100.00	0.89	0.54	14.11	9.29	59.32	47.99	25.68	42.18	1.48	0.76	1.94	1.35	1.58

(\*) Home purchase loans originated in the MSA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Multi-state Metropolitan Areas				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full-Scope Review:																
Augusta-Aiken, GA-SC MSA	44	100.00	4.43	0.00	11.94	34.09	51.43	43.18	32.20	22.73	1.50	0.00	5.23	0.77	1.40	
Charlotte-Gastonia-Rock Hill, NC-SC MSA	145	100.00	0.89	3.45	14.11	13.79	59.32	55.17	25.68	25.59	1.26	2.86	0.95	1.25	1.39	

(\*) Home improvement loans originated in the MSA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Multi-state Metropolitan Areas				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full-Scope Review:																
Augusta-Aiken, GA-SC MSA	274	100.00	4.43	1.46	11.94	12.77	51.43	39.05	32.20	46.72	1.25	1.06	2.11	1.15	1.19	
Charlotte-Gastonia-Rock Hill, NC-SC MSA	1,145	100.00	0.89	0.87	14.11	6.64	59.32	48.30	25.68	44.19	0.96	0.81	0.55	0.84	1.35	

(\*) Home mortgage refinance loans originated in the MSA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												Multi-state Metropolitan Areas					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***										
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full-Scope Review:																					
Augusta-Aiken, GA-SC	464	100.00	8.20	10.13	18.94	19.40	37.37	31.68	35.49	38.79	4.00	5.39	5.28	3.86	3.57						
Charlotte-Gastonia-Rock Hill, NC-SC MSA	2,017	100.00	6.15	5.16	20.33	17.80	49.11	44.27	24.18	32.62	5.34	5.71	7.01	4.85	5.50						

(\*) Small loans to businesses originated in the MSA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS												Multi-state Metropolitan Areas					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***										
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full-Scope Review:																					
Augusta-Aiken, GA-SC MSA	5	100.00	1.50	0.00	21.00	80.00	43.00	20.00	34.50	0.00	4.08	0.00	8.82	1.89	0.00						
Charlotte-Gastonia-Rock Hill, NC-SC MSA	11	100.00	1.38	0.00	12.00	0.00	66.21	63.66	20.34	36.34	3.38	0.00	0.00	2.72	14.29						

(\*) Small loans to farms originated in the MSA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Multi-state Metropolitan Areas					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Augusta-Aiken, GA-SC MSA	330	100.00	21.31	9.40	16.73	18.48	21.47	18.48	40.49	53.64	1.00	1.2	0.9	0.8	1.7	
Charlotte-Gastonia-Rock Hill, NC-SC MSA	2,034	100.00	18.58	9.54	18.09	24.48	24.41	21.44	38.92	44.54	1.48	2.32	1.89	1.33	1.99	

(\*) Home purchase loans originated in the MSA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by the bank in both MSAs.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Multi-state Metropolitan Areas					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Augusta-Aiken, GA-SC MSA	44	100.00	21.31	15.91	16.73	22.73	21.47	27.27	40.49	34.09	1.50	1.69	2.0	1.34	1.40	
Charlotte-Gastonia-Rock Hill, NC-SC MSA	145	100.00	18.58	20.69	18.09	20.69	24.41	20.00	38.92	38.62	1.26	1.37	0.71	1.11	1.92	

(\*) Home improvement loans originated in the MSA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated by the bank in both MSAs.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Multi-state Metropolitan Areas		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000											
MSA/AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Augusta-Aiken, GA-SC MSA	274	100.00	21.31	5.11	173	11.31	21.47	18.61	40.49	64.60	1.25	0.46	1.51	1.45	2.39
Charlotte-Gastonia-Rock Hill, NC-SC MSA	1,145	100.00	18.58	7.60	18.09	15.98	24.41	23.41	38.92	52.40	0.96	1.05	0.94	0.97	1.82

(\*) Home mortgage refinance loans originated in the MSA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.37% and 0.61% of loans originated by the bank in the Augusta-Aiken and Charlotte-Gastonia-Rock Hill MSAs, respectively.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Multi-state Metropolitan Areas		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
MSA/AA:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Augusta-Aiken, GA-SC MSA	464	100.00	70.87	64.66	79.09	10.99	9.91	4.00	3.80
Charlotte-Gastonia-Rock Hill, NC-SC MSA	2,017	100.00	68.00	57.71	75.46	12.05	12.49	5.34	5.27

(\*) Small loans to businesses originated in the MSA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.42% and 10.50% of small loans to businesses originated by the bank in the Augusta-Aiken and Charlotte-Gastonia-Rock Hill MSAs, respectively.

Wachovia Bank, N.A.

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

Charter Number: 1559

**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Multi-state Metropolitan Areas			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Farms**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Augusta-Aiken, GA-SC MSA	5	100.00	94.63	20.00	80.00	20.00	0.00	4.08	1.22
Charlotte-Gastonia-Rock Hill, NC-SC MSA	11	100.00	94.76	18.18	63.64	27.27	9.09	3.38	1.21

(\*) Small loans to farms originated in the MSA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 20.00% and 75.0% of small loans to farms originated by the bank in the Augusta-Aiken and Charlotte-Gastonia-Rock Hill MSAs, respectively.

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Multi-state Metropolitan Areas			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope Review:									
Augusta-Aiken, GA-SC MSA	9	356	20	1,792	29	2,148	100.00	0	0
Charlotte-Gastonia-Rock Hill, NC-SC MSA	7	1,367	69	8,557	73	9,924	100.00	2	311

(\*) Prior Period Investments" means investments made in previous evaluation periods that are outstanding as of the evaluation date.

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

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Multi-state Metropolitan Areas																	
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000																	
MSA/AA:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	% Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope Review:																	
Augusta-Aiken, GA-SC MSA	100.0	9	100.0	0.0	22.22	33.33	44.45	1	1	0	0	0	0	6.72	13.83	51.28	28.17
Charlotte-Gastonia-Rock Hill, NC-SC MSA	100.00	35	100.00	8.57	25.71	31.43	34.29	2	2	0	0	-2	+2	3.12	17.63	56.79	22.46

**Table 1. Lending Volume**

LENDING VOLUME		State: FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MSA/AA:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope Review:												
West Palm Beach-Boca Raton MSA	35.96	326	105,083	786	94,406	1	22	3	6,281	1,116	205,792	51.30
Limited-Scope Review:												
Fort Lauderdale MSA	24.77	211	32,859	556	46,510	0	0	6	9,602	773	88,971	22.82
Fort Pierce-Port St. Lucie MSA	3.00	39	5,834	54	5,394	0	0	0	0	93	11,228	4.03
Jacksonville MSA	1.87	26	21,333	31	2,599	0	0	3	29,815	60	32,414	0.00
Melbourne-Titusville-Palm Bay MSA	26.06	173	24,647	633	38,280	0	0	3	1,289	809	64,216	21.78
Orlando MSA	4.80	53	18,572	92	10,897	2	344	2	21,687	149	57,575	0.00
Pensacola MSA	1.03	4	785	2	520	0	0	26	5,845	32	7,150	0.00
Tampa-St. Petersburg-Clearwater MSA	2.51	31	37,376	45	7,688	0	0	3	25,386	79	70,450	0.07

(\*) Rated area refers to either the state or Multi-state MSA rating area.

(\*\*) The evaluation period for Community Development Loans is January 1, 1998 to December 31, 2000.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or Multi-state MSA rating area.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			State: FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full-Scope Review:																
West Palm Beach-Boca Raton MSA	188	40.08	0.93	0.00	20.87	7.45	46.30	28.19	31.90	63.30	0.20	0.00	0.17	0.13	0.30	
Limited-Scope Review:																
Fort Lauderdale MSA	108	23.03	1.11	0.93	14.39	11.11	58.85	47.22	25.64	40.74	0.06	0.00	0.12	0.06	0.05	
Fort Pierce-Port St. Lucie MSA	19	4.05	N/A	N/A	4.63	0.00	57.76	36.84	37.61	63.16	0.05	N/A	0.00	0.05	0.06	
Jacksonville MSA	19	4.05	4.20	0.00	15.85	0.00	51.99	52.63	27.96	47.37	0.03	0.00	0.00	0.03	0.04	
Melbourne-Titusville-Palm Bay MSA	67	14.29	0.49	0.00	18.78	17.91	60.28	62.69	20.45	19.40	0.17	0.00	0.29	0.16	0.14	
Orlando MSA	43	9.17	0.96	0.00	12.30	13.95	59.82	41.86	26.92	44.19	0.04	0.00	0.12	0.02	0.06	
Pensacola MSA	2	0.43	4.12	0.00	10.13	0.00	57.65	0.00	28.10	100.00	0.00	0.00	0.00	0.00	0.00	
Tampa-St. Petersburg-Clearwater MSA	23	4.90	1.48	0.00	13.78	0.00	42.95	8.70	41.79	91.30	0.02	0.00	0.00	0.01	0.03	

(\*) Home purchase loans originated in the MSA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT				STATE: FLORIDA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Improvement 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-Scope Review:															
West Palm Beach-Boca Raton MSA	16	20.51	0.93	6.25	20.87	0.00	46.30	43.75	31.90	50.00	0.19	2.78	0.00	0.16	0.25
Limited-Scope Review:															
Fort Lauderdale MSA	28	35.90	1.11	0.00	14.39	25.00	58.85	57.14	25.64	17.86	0.23	0.00	0.60	0.18	0.10
Fort Pierce-Port St. Lucie MSA	0	0.00	N/A	N/A	4.63	0.00	57.76	0.00	37.61	0.00	0.00	N/A	0.00	0.00	0.00
Jacksonville MSA	0	0.00	4.20	0.00	15.85	0.00	51.99	0.00	27.96	0.00	0.00	0.00	0.00	0.00	0.00
Melbourne-Titusville-Palm Bay MSA	31	39.75	0.49	0.00	18.78	16.13	60.28	58.06	20.45	25.81	0.96	0.00	1.60	0.78	1.10
Orlando MSA	1	1.28	0.96	0.00	12.30	0.00	59.82	0.00	26.92	100.00	0.00	0.00	0.00	0.00	0.00
Pensacola MSA	0	0.00	4.12	0.00	10.13	0.00	57.65	0.00	28.10	0.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater MSA	2	2.56	1.48	0.00	13.78	0.00	42.95	50.00	41.79	50.00	0.00	0.00	0.00	0.00	0.00

(\*) Home improvement loans originated in the MSA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: FLORIDA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	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-Scope Review:															
West Palm Beach-Boca Raton MSA	117	40.77	0.93	0.85	20.87	6.84	46.30	35.90	31.90	56.41	0.20	0.00	0.14	0.17	0.27
Limited-Scope Review:															
Fort Lauderdale MSA	60	20.91	1.11	1.67	14.39	10.00	58.85	55.00	25.64	33.33	0.08	0.00	0.05	0.06	0.12
Fort Pierce-Port St. Lucie MSA	20	6.97	N/A	N/A	4.63	0.00	57.76	30.00	37.61	70.00	0.34	N/A	0.00	0.18	0.58
Jacksonville MSA	5	1.74	4.20	0.00	15.85	0.00	51.99	20.00	27.96	80.00	0.01	0.00	0.00	0.01	0.00
Melbourne-Titusville-Palm Bay MSA	71	24.74	0.49	0.00	18.78	12.68	60.28	59.15	20.45	28.17	0.44	0.00	0.18	0.42	0.68
Orlando MSA	7	2.44	0.96	0.00	12.30	28.57	59.82	42.86	26.92	28.57	0.00	0.00	0.00	0.00	0.00
Pensacola MSA	2	0.70	4.12	0.00	10.13	0.00	57.65	50.00	28.10	50.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater MSA	5	1.74	1.48	0.00	13.78	0.00	42.95	0.00	41.79	100.00	0.01	0.00	0.00	0.00	0.02

(\*) Home mortgage refinance loans originated in the MSA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES			STATE: FLORIDA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans						
Full-Scope Review:																
West Palm Beach-Boca Raton MSA	786	35.74	2.56	3.44	19.13	16.79	43.21	42.75	34.08	36.51	2.64	3.33	3.70	2.59	2.34	
Limited-Scope Review:																
Fort Lauderdale MSA	556	25.28	5.95	6.83	17.28	29.68	50.71	41.01	26.05	22.48	1.22	1.98	2.98	0.97	0.80	
Fort Pierce-Port St. Lucie MSA	54	2.46	N/A	N/A	23.07	7.41	51.68	55.55	25.25	37.04	1.33	N/A	0.23	2.15	1.04	
Jacksonville MSA	31	1.41	7.51	3.23	25.59	22.58	43.73	41.93	23.17	32.26	0.20	0.00	0.14	0.22	0.23	
Melbourne-Titusville-Palm Bay MSA	633	28.79	1.13	0.47	31.60	24.65	49.79	56.87	17.13	17.85	6.53	5.00	6.81	6.77	5.74	
Orlando MSA	92	4.18	4.97	3.26	15.68	19.57	57.65	48.91	21.64	28.26	0.12	0.00	0.20	0.16	0.03	
Pensacola MSA	2	0.09	13.81	0.00	13.57	50.00	49.25	0.00	19.88	50.00	0.00	0.00	0.00	0.00	0.00	
Tampa-St. Petersburg-Clearwater MSA	45	2.05	2.18	0.00	20.63	20.00	37.42	28.89	39.49	51.11	0.14	0.00	0.18	0.10	0.18	

(\*) Small loans to businesses originated in the MSA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS			STATE: FLORIDA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
Full-Scope Review:																
West Palm Beach-Boca Raton MSA	1	33.33	3.01	0.00	17.65	0.00	50.70	0.00	28.54	100.00	0.00	0.00	0.00	0.00	0.00	
Limited-Scope Review:																
Fort Lauderdale MSA	0	0.00	3.68	0.00	17.57	0.00	52.04	0.00	26.64	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Pierce-Port St. Lucie MSA	0	0.00	N/A	N/A	9.90	0.00	64.50	0.00	25.60	0.00	0.00	N/A	0.00	0.00	0.00	
Jacksonville MSA	0	0.00	1.95	0.00	16.23	0.00	51.95	0.00	29.87	0.00	0.00	0.00	0.00	0.00	0.00	
Melbourne-Titusville-Palm Bay MSA	0	0.00	1.04	0.00	21.20	0.00	63.36	0.00	14.29	0.00	0.00	0.00	0.00	0.00	0.00	
Orlando MSA	2	66.67	1.40	0.00	19.67	0.00	55.14	50.00	23.79	50.00	0.00	0.00	0.00	0.00	0.00	
Pensacola MSA	0	0.00	3.80	0.00	10.13	0.00	61.18	0.00	24.89	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa-St. Petersburg-Clearwater MSA	0	0.00	1.14	0.00	16.95	0.00	46.87	0.00	35.04	0.00	0.00	0.00	0.00	0.00	0.00	

(\*) Small loans to farms originated in the MSA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

BORROWER DISTRIBUTION: HOME PURCHASE				STATE: FLORIDA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
West Palm Beach-Boca Raton MSA	188	40.08	18.84	2.13	19.04	13.30	22.60	13.83	39.52	70.74	0.20	0.06	0.18	0.16	0.37
Limited-Scope Review:															
Fort Lauderdale MSA	108	23.03	19.63	12.96	18.27	16.67	22.52	15.74	39.58	54.63	0.06	0.12	0.08	0.04	0.08
Fort Pierce-Port St. Lucie MSA	19	4.05	14.59	5.26	17.11	21.05	22.18	26.32	46.12	47.37	0.05	0.37	0.00	0.00	0.06
Jacksonville MSA	19	4.05	20.65	5.26	18.39	31.58	23.60	21.05	37.36	42.11	0.03	0.00	0.04	0.05	0.04
Melbourne-Titusville-Palm Bay MSA	67	14.29	17.64	20.90	19.92	19.40	24.16	16.42	38.28	43.28	0.17	0.28	0.12	0.18	0.25
Orlando MSA	43	9.17	18.01	0.00	18.95	27.91	23.62	9.30	39.42	58.14	0.04	0.00	0.11	0.00	0.04
Pensacola MSA	2	0.43	21.27	0.00	18.09	0.00	21.69	0.00	38.95	100.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater MSA	23	4.90	17.91	0.00	16.83	4.35	21.74	21.74	43.52	73.91	0.02	0.00	0.02	0.00	0.04

(\*) Home purchase loans originated in the MSA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.43% of loans originated by the bank in Florida.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

BORROWER DISTRIBUTION: HOME IMPROVEMENT				STATE: FLORIDA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
West Palm Beach-Boca Raton MSA	16	20.51	18.84	0.00	19.04	12.50	22.60	31.25	39.52	43.75	0.19	0.00	0.00	0.16	0.32
Limited-Scope Review:															
Fort Lauderdale MSA	28	35.90	19.63	28.57	18.27	25.00	22.52	10.71	39.58	35.72	0.22	0.79	0.43	0.11	0.14
Fort Pierce-Port St. Lucie MSA	0	0.00	14.59	0.00	17.11	0.00	22.18	0.00	46.12	0.00	0.00	0.00	0.00	0.00	0.00
Jacksonville MSA	0	0.00	20.65	0.00	18.39	0.00	23.60	0.00	37.36	0.00	0.00	0.00	0.00	0.00	0.00
Melbourne-Titusville-Palm Bay MSA	31	39.75	17.64	19.35	19.92	25.81	24.16	29.03	38.28	25.81	0.94	1.31	1.59	0.79	0.77
Orlando MSA	1	1.28	18.01	0.00	18.95	0.00	23.62	0.00	39.42	100.00	0.00	0.00	0.00	0.00	0.00
Pensacola MSA	0	0.00	21.27	0.00	18.09	0.00	21.69	0.00	38.95	0.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater MSA	2	2.56	17.91	0.00	16.83	0.00	21.74	0.00	43.52	100.00	0.00	0.00	0.00	0.00	0.00

(\*) Home improvement loans originated in the MSA as a percentage of all home improvement loans originated in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census information.  
 (\*\*\*) As a percentage of loans with borrower income information available. No information was available for 2.56% of loans originated by the bank in Florida.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: FLORIDA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
West Palm Beach-Boca Raton MSA	117	40.77	18.84	2.56	19.04	6.84	22.60	11.97	39.52	78.63	0.20	0.00	0.09	0.16	0.50
Limited-Scope Review:															
Fort Lauderdale MSA	60	20.90	19.63	8.33	18.27	31.67	22.52	16.67	39.58	41.67	0.08	0.00	0.13	0.09	0.11
Fort Pierce-Port St. Lucie MSA	20	6.97	14.59	5.00	17.11	5.00	22.18	10.00	46.12	80.00	0.34	0.00	0.00	0.53	0.61
Jacksonville MSA	5	1.74	20.65	0.00	18.39	0.00	23.60	20.00	37.36	80.00	0.01	0.00	0.00	0.04	0.00
Melbourne-Titusville-Palm Bay MSA	71	24.74	17.64	15.49	19.92	30.99	24.16	19.72	38.28	33.80	0.44	0.48	0.88	0.51	0.56
Orlando MSA	7	2.44	18.01	0.00	18.95	0.00	23.62	28.57	39.42	71.43	0.00	0.00	0.00	0.00	0.00
Pensacola MSA	2	0.70	21.27	0.00	18.09	0.00	21.69	0.00	38.95	100.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater MSA	5	1.74	17.91	0.00	16.83	20.00	21.74	20.00	43.52	60.00	0.01	0.00	0.03	0.03	0.00

(\*) Home mortgage refinance loans originated in the MSA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.35% of loans originated by the bank in Florida.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES					STATE: FLORIDA		EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000		
MSA/AA:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
West Palm Beach-Boca Raton MSA	786	35.74	75.45	65.14	72.77	15.01	12.21	2.64	2.88
Limited-Scope Review:									
Fort Lauderdale MSA	556	25.28	74.80	62.23	80.94	11.87	7.19	1.22	1.36
Fort Pierce-Port St. Lucie MSA	54	2.46	75.60	77.78	79.63	7.41	12.96	1.33	1.53
Jacksonville MSA	31	1.41	67.19	16.13	83.87	12.90	3.23	0.20	0.05
Melbourne-Titusville-Palm Bay MSA	633	28.79	77.97	79.15	86.26	9.48	4.27	6.53	8.96
Orlando MSA	92	4.18	68.81	23.91	75.00	9.78	15.22	0.12	0.11
Pensacola MSA	2	0.09	69.65	50.00	50.00	0.00	50.00	0.03	0.00
Tampa-St. Petersburg-Clearwater MSA	45	2.05	68.89	17.78	71.11	8.89	20.00	0.14	0.03

(\*) Small loans to businesses originated in the MSA as a percentage of all small loans to businesses originated in the rated area.  
 (\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.  
 (\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.48% of small loans to businesses originated by the bank in Florida.  
 (\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms**

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		STATE: FLORIDA DECEMBER 31, 2000			EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Farms**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
West Palm Beach-Boca Raton MSA	1	33.33	90.04	0.00	100.00	0.00	0.00	0.00	0.00
Limited-Scope Review:									
Fort Lauderdale MSA	0	0.00	95.64	0.00	0.00	0.00	0.00	0.00	0.00
Fort Pierce-Port St. Lucie MSA	0	0.00	86.35	0.00	0.00	0.00	0.00	0.00	0.00
Jacksonville MSA	0	0.00	90.42	0.00	0.00	0.00	0.00	0.00	0.00
Melbourne-Titusville-Palm Bay MSA	0	0.00	96.31	0.00	0.00	0.00	0.00	0.00	0.00
Orlando MSA	2	66.67	89.55	0.00	50.00	0.00	50.00	0.00	0.00
Pensacola MSA	0	0.00	91.98	0.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater MSA	0	0.00	88.83	0.00	0.00	0.00	0.00	0.00	0.00

(\*) Small loans to farms originated in the MSA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 33.33% of small loans to farms originated by the bank in Florida.

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: FLORIDA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
MSA/AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope Review:									
West Palm Beach-Boca Raton MSA	2	8	19	7,545	21	7,553	35.88	0	0
Limited-Scope Review:									
Fort Lauderdale MSA	1	1	14	3,267	15	3,268	15.52	0	0
Fort Pierce-Port St. Lucie MSA	1	0	10	551	11	551	2.62	0	0
Jacksonville MSA	1	0	7	148	8	148	0.70	0	0
Melbourne-Titusville-Palm Bay MSA	1	1	14	2,784	15	2,785	13.23	0	0
Orlando MSA	1	0	13	6,276	14	6,276	29.81	0	0
Pensacola MSA	1	0	8	58	9	58	0.28	0	0
Tampa-St. Petersburg-Clearwater MSA	1	0	12	414	13	414	1.97	0	0

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the evaluation date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	% Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope Review:																	
West Palm Beach-Boca Raton MSA	51.30	12	27.91	8.33	0.00	50.00	41.67	2	14	+1	0	+6	+5	3.05	21.73	46.83	28.15
Limited-Scope Review:																	
Fort Lauderdale MSA	22.82	7	16.28	14.29	14.29	42.86	28.57	2	9	+1	+1	+3	+2	3.25	18.55	54.95	23.17
Fort Pierce-Port St. Lucie MSA	4.03	3	6.98	0.00	33.33	66.67	0.00	0	3	0	+1	+2	0	N/A	7.44	57.30	35.26
Jacksonville MSA	0.00	1	2.32	0.00	0.00	100.00	0.00	0	0	0	0	0	0	6.34	19.74	49.88	23.25
Melbourne-Titusville-Palm Bay MSA	21.78	11	25.58	0.00	18.18	63.64	18.18	4	15	0	+2	+7	+2	1.07	22.08	59.38	17.45
Orlando MSA	0.00	5	11.63	0.00	0.00	60.00	40.00	0	4	0	0	+2	+2	2.80	15.53	59.12	21.18
Pensacola MSA	0.00	1	2.33	100.00	0.00	0.00	0.00	0	0	0	0	0	0	5.34	12.08	57.19	25.08
Tampa-St. Petersburg-Clearwater MSA	0.07	3	6.98	0.00	0.00	0.00	100.00	0	2	0	0	0	+2	3.37	17.56	42.89	35.82

**Table 1. Lending Volume**

LENDING VOLUME		State: GEORGIA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MSA/AA:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope Review:												
Atlanta MSA	79.14	8,724	1,635,492	6,895	666,660	26	1,823	321	449,574	15,966	2,753,549	81.91
Limited-Scope Review:												
Athens MSA	0.94	114	18,049	68	8,643	0	0	8	9,529	190	36,221	0.52
Macon MSA	3.02	274	38,873	328	38,892	5	612	3	11,058	610	89,435	2.78
Savannah MSA	7.80	1,044	148,329	514	46,815	6	432	10	13,034	1,574	60,281	5.72
GA Non-MSA AA	9.10	1,152	102,462	630	51,207	27	2,348	26	22,685	1,835	178,702	9.08

(\*) Rated area refers to either the state or Multi-state MSA rating area.

(\*\*) The evaluation period for Community Development Loans is January 1, 1998 to December 31, 2000.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or Multi-state MSA rating area.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			State: GEORGIA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full-Scope Review:																
Atlanta MSA	4,602	79.11	3.12	1.80	13.26	10.67	44.68	37.66	38.94	49.87	1.06	0.91	1.34	0.84	1.26	
Limited-Scope Review:																
Athens MSA	86	1.48	4.44	3.49	15.23	3.49	30.04	26.74	50.29	66.28	1.59	3.77	0.74	1.98	1.50	
Macon MSA	156	2.68	6.49	1.28	13.37	4.49	46.92	19.23	33.22	75.00	0.65	0.56	0.64	0.31	1.01	
Savannah MSA	532	9.14	3.93	1.88	18.23	7.33	39.41	31.77	38.43	59.02	3.54	1.72	3.04	3.26	3.90	
GA Non-MSA AA	441	7.58	N/A	N/A	0.99	1.59	52.87	38.32	46.14	60.09	1.89	N/A	0.00	1.59	2.13	

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT				STATE: GEORGIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Improvement 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-Scope Review:															
Atlanta MSA	557	66.71	3.12	5.03	13.26	19.93	44.68	42.91	38.94	32.13	2.29	5.02	2.97	2.12	1.96
Limited-Scope Review:															
Athens MSA	1	0.12	4.44	0.00	15.23	0.00	30.04	0.00	50.29	100.00	0.00	0.00	0.00	0.00	0.00
Macon MSA	14	1.68	6.49	7.14	13.37	14.29	46.92	50.00	33.22	28.57	1.61	3.70	4.76	1.51	0.60
Savannah MSA	57	6.83	3.93	7.02	18.23	31.58	39.41	31.58	38.43	29.82	6.15	3.85	11.54	5.33	4.73
GA Non-MSA AA	206	24.67	N/A	N/A	0.99	0.00	52.87	54.85	46.14	45.15	11.83	N/A	0.00	12.65	11.00

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: GEORGIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	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-Scope Review:															
Atlanta MSA	3,534	76.70	3.12	2.04	13.26	10.73	44.68	35.96	38.94	51.27	1.00	0.90	1.09	0.88	1.11
Limited-Scope Review:															
Athens MSA	22	0.48	4.44	0.00	15.23	18.18	30.04	4.55	50.29	77.27	0.20	0.00	0.45	0.00	0.27
Macon MSA	102	2.21	6.49	1.96	13.37	4.90	46.92	36.28	33.22	56.86	0.51	0.28	0.00	0.47	0.73
Savannah MSA	447	9.70	3.93	2.01	18.23	6.71	39.41	25.06	38.43	66.22	3.43	1.67	1.83	2.54	4.93
GA Non-MSA AA	503	10.91	N/A	N/A	0.99	0.20	52.87	40.56	46.14	59.24	2.07	N/A	0.00	1.99	2.17

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		STATE: GEORGIA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Atlanta MSA	6,895	81.74	4.64	3.97	13.74	12.11	42.75	38.56	38.87	45.25	7.16	12.34	8.81	5.91	7.85	
Limited-Scope Review:																
Athens MSA	68	0.81	22.26	13.24	12.88	5.88	24.53	30.88	40.33	50.00	2.01	1.89	0.60	2.94	1.94	
Macon MSA	328	3.89	17.34	14.94	14.27	9.15	41.51	35.06	26.88	40.85	4.94	6.03	3.19	4.15	5.89	
Savannah MSA	514	6.09	7.99	3.70	15.88	13.04	42.89	41.44	32.87	40.66	7.21	4.64	9.11	6.87	7.29	
GA Non-MSA AA	630	7.47	N/A	N/A	3.12	0.00	58.44	54.29	38.45	45.40	5.57	N/A	0.00	5.37	6.03	

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS			STATE: GEORGIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
Full-Scope Review:																
Atlanta MSA	26	40.62	2.10	0.00	11.00	42.31	49.37	38.46	37.53	19.23	4.21	0.00	19.15	0.00	2.83	
Limited-Scope Review:																
Athens MSA	0	0.00	3.66	0.00	13.41	0.00	36.59	0.00	46.34	0.00	0.00	0.00	0.00	0.00	0.00	
Macon MSA	5	7.81	7.14	20.00	14.29	0.00	48.35	0.00	30.22	80.00	1.89	25.00	0.00	0.00	0.00	
Savannah MSA	6	9.38	0.67	0.00	11.41	0.00	42.95	66.67	44.30	33.33	30.00	0.00	0.00	33.33	25.00	
GA Non-MSA AA	27	42.19	N/A	N/A	2.53	3.70	67.31	77.78	30.16	18.52	4.39	N/A	0.00	4.22	5.13	

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

BORROWER DISTRIBUTION: HOME PURCHASE		STATE: GEORGIA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Borrower Income****				
MSA/AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***						
Full-Scope Review:																
Atlanta MSA	4,602	79.12	18.65	7.39	17.67	20.17	23.43	18.88	40.25	53.52	1.06	1.37	1.10	0.87	1.96	
Limited-Scope Review:																
Athens MSA	86	1.48	25.25	2.33	17.12	17.44	18.32	24.42	39.31	55.81	1.59	0.82	1.42	1.52	2.49	
Macon MSA	156	2.68	22.89	4.49	15.69	17.31	21.03	23.07	40.39	55.13	0.65	0.00	0.79	0.59	1.51	
Savannah MSA	532	9.13	22.65	9.02	16.28	17.29	21.02	17.11	40.05	56.39	3.54	4.74	3.99	3.22	5.20	
GA Non-MSA AA	441	7.59	16.16	3.85	14.23	18.14	20.72	23.81	48.90	54.20	1.89	2.65	3.15	1.82	2.46	

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated by the bank in Georgia.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

BORROWER DISTRIBUTION: HOME IMPROVEMENT				STATE: GEORGIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000								
MSA/AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Atlanta MSA	557	66.55	18.65	21.54	17.67	23.70	23.43	21.18	40.25	33.86	2.29	4.16	2.77	2.10	2.21	
Limited-Scope Review:																
Athens MSA	1	0.12	25.25	100.00	17.12	0.00	18.32	0.00	39.31	0.00	0.00	0.00	0.00	0.00	0.00	
Macon MSA	14	1.68	22.89	35.72	15.69	0.00	21.03	7.14	40.39	57.14	1.61	7.41	0.00	0.00	1.67	
Savannah MSA	57	6.86	22.65	8.77	16.28	24.56	21.02	24.56	40.05	42.11	6.15	3.77	4.41	5.77	8.98	
GA Non-MSA AA	206	24.79	16.16	5.34	14.22	20.87	20.72	29.61	48.90	44.18	11.83	13.64	18.10	13.15	9.67	

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census information.  
 (\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.36% of loans originated by the bank in Georgia.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: GEORGIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000								
MSA/AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Atlanta MSA	3,534	76.68	18.65	8.86	17.67	18.25	23.43	22.96	40.25	50.31	1.00	1.46	1.33	1.18	1.64	
Limited-Scope Review:																
Athens MSA	22	0.48	25.25	4.55	17.12	9.09	18.32	4.54	39.31	81.82	0.20	1.08	0.00	0.00	0.33	
Macon MSA	102	2.21	22.89	4.90	15.69	15.69	21.03	20.59	40.39	57.84	0.51	0.26	1.00	0.58	0.82	
Savannah MSA	447	9.72	22.65	4.70	16.28	11.19	21.02	18.34	40.05	65.32	3.43	2.02	3.91	4.18	6.02	
GA Non-MSA AA	503	10.92	16.16	1.79	14.22	11.73	20.72	19.88	48.90	66.00	2.07	0.96	2.10	2.52	3.12	

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.71% of loans originated by the bank in Georgia.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES STATE: GEORGIA EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Atlanta MSA	6,895	81.74	68.72	56.75	78.12	11.18	10.70	7.16	6.71
Limited-Scope Review:									
Athens MSA	68	0.81	68.53	44.12	70.59	10.29	19.12	2.01	1.07
Macon MSA	328	3.89	70.10	53.96	71.65	14.94	13.41	4.94	3.72
Savannah MSA	514	6.09	66.77	67.51	81.32	8.37	10.31	7.21	7.33
GA Non-MSA AA	630	7.47	70.85	54.44	81.11	11.11	7.78	5.57	4.42

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 13.80% of small loans to businesses originated by the bank in Georgia.

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms**

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		STATE: GEORGIA DECEMBER 31, 2000			EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Farms**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Atlanta MSA	26	40.62	92.89	15.38	84.62	3.85	11.54	4.21	0.39
Limited-Scope Review:									
Athens MSA	0	0.00	90.24	0.00	0.00	0.00	0.00	0.00	0.00
Macon MSA	5	7.81	94.51	60.00	60.00	20.00	20.00	1.89	2.13
Savannah MSA	6	9.38	92.62	33.33	66.67	33.33	0.00	30.00	25.00
GA Non-MSA AA	27	42.19	89.88	44.44	70.37	22.22	7.41	4.39	2.35

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 56.25% of small loans to farms originated by the bank in Georgia.

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: GEORGIA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
MSA/AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope Review:									
Atlanta MSA	6	2,872	90	22,665	94	25,537	82.80	2	1,032
Limited-Scope Review:									
Athens MSA	4	19	5	142	9	161	0.52	0	0
Macon MSA	4	92	18	906	22	998	3.24	0	0
Savannah MSA	6	303	16	1,545	22	1,848	5.99	0	0
GA Non-MSA AA	4	241	34	2,055	38	2,296	7.44	0	0

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the evaluation date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: GEORGIA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	% Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope Review:																	
Atlanta MSA	81.91	99	78.57	3.03	17.17	32.32	47.47	13	19	0	-4	+3	+7	6.76	17.00	44.33	31.91
Limited-Scope Review:																	
Athens MSA	0.52	2	1.59	50.00	0.00	50.00	0.00	0	0	0	0	0	0	13.03	20.34	25.52	41.11
Macon MSA	2.78	4	3.18	25.00	25.00	25.00	25.00	2	0	0	0	-1	-1	11.95	17.03	44.55	26.47
Savannah MSA	5.72	9	7.14	0.00	11.11	33.33	55.56	1	0	0	0	0	-1	8.59	22.65	39.50	29.26
GA Non-MSA AA	9.08	12	9.52	N/A	0.00	66.67	33.33	2	1	0	0	-2	+1	N/A	3.29	54.98	41.73

**Table 1. Lending Volume**

LENDING VOLUME		State: NORTH CAROLINA						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope Review:												
Greensboro--Winston-Salem--High Point MSA	21.37	3,988	588,779	2,082	235,901	13	878	47	107,044	6,130	932,602	45.56
Raleigh-Durham-Chapel Hill MSA	21.63	3,557	716,540	2,483	238,646	31	2,308	152	210,794	6,223	1,168,288	18.47
Limited-Scope Review:												
Asheville MSA	5.31	1,014	132,147	497	52,327	3	25	8	20,204	1,522	204,703	5.65
Fayetteville MSA	1.35	148	29,482	206	21,574	4	253	30	4,667	388	55,976	1.09
Goldsboro MSA	1.81	211	27,408	261	24,071	32	3,060	14	9,660	518	64,199	1.53
Greenville MSA	5.31	721	118,233	534	59,406	70	7,932	26	19,262	1,522	204,833	2.23
Hickory-Morganton-Lenoir MSA	2.72	528	72,775	235	38,742	3	176	13	10,471	779	122,164	1.90
Jacksonville MSA	1.96	219	43,659	310	21,720	17	1,011	17	11,457	563	77,847	0.87
Rocky Mount MSA	2.62	441	61,793	250	33,994	55	8,273	4	9,885	750	113,945	1.06
Wilmington MSA	4.35	756	143,361	463	46,484	3	81	26	14,934	1,248	204,860	3.36
NC Non-MSA AA	31.58	5,099	610,659	3,525	293,572	409	40,035	26	65,917	9,059	1,010,183	18.30

(\*) Rated area refers to either the state or Multi-state MSA rating area.

(\*\*) The evaluation period for Community Development Loans is January 1, 1998 to December 31, 2000.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or Multi-state MSA rating area.

**Table 2. Geographic Distribution of Home Purchase Loans**

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE			STATE: NORTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	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	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Greensboro--Winston-Salem--High Point MSA	2,261	25.46	1.03	0.53	10.92	6.14	62.97	49.97	25.08	43.34	2.61	3.13	1.64	2.29	3.38	
Raleigh-Durham-Chapel Hill MSA	2,099	23.62	1.37	0.33	17.47	5.86	47.06	46.56	34.10	47.23	1.89	0.81	1.18	1.60	2.64	
Limited-Scope Review:																
Asheville MSA	567	6.37	0.37	0.53	12.19	8.48	71.05	65.90	16.37	25.08	3.22	3.33	3.24	2.82	4.88	
Fayetteville MSA	46	0.52	0.85	0.00	10.19	2.17	69.03	47.82	19.93	50.00	0.22	0.00	0.23	0.17	0.35	
Goldsboro MSA	71	0.80	0.10	0.00	5.77	5.63	77.10	69.01	17.03	25.35	1.04	0.00	2.30	1.03	0.80	
Greenville MSA	477	5.37	4.03	2.09	17.85	5.03	45.05	40.46	33.07	52.41	4.14	2.63	1.31	3.94	5.33	
Hickory-Morganton-Lenoir MSA	326	3.67	N/A	N/A	3.81	2.45	86.28	69.01	9.91	28.52	1.68	N/A	3.06	1.37	3.60	
Jacksonville MSA	83	0.93	N/A	N/A	3.55	1.20	79.85	77.10	16.60	21.68	0.88	N/A	0.00	0.87	1.03	
Rocky Mount MSA	310	3.49	0.10	0.00	11.43	2.90	69.54	50.32	18.93	46.77	3.83	0.00	1.61	3.08	6.54	
Wilmington MSA	356	4.01	4.23	2.80	12.53	5.33	43.73	37.35	39.51	54.49	2.47	4.13	1.47	1.79	3.34	
NC Non-MSA AA	2,288	25.76	0.72	0.09	9.30	4.59	63.27	46.07	26.71	49.26	3.04	0.68	1.77	2.60	3.95	

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT			STATE: NORTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full-Scope Review:																
Greensboro--Winston-Salem--High Point MSA	127	15.84	1.03	2.36	10.92	13.38	62.97	60.62	25.08	23.62	1.56	2.50	0.99	1.76	1.15	
Raleigh-Durham-Chapel Hill MSA	106	13.22	1.37	2.83	17.47	14.15	47.06	40.56	34.10	42.45	1.46	2.56	1.57	0.88	2.47	
Limited-Scope Review:																
Asheville MSA	35	4.36	0.37	0.00	12.19	14.28	71.05	71.42	16.37	14.28	4.61	0.00	6.06	3.83	7.69	
Fayetteville MSA	11	1.37	0.85	0.00	10.19	9.09	69.03	63.63	19.93	27.27	0.44	0.00	0.00	0.20	1.49	
Goldsboro MSA	14	1.75	0.10	0.00	5.77	7.14	77.10	85.71	17.03	7.14	3.62	0.00	0.00	4.24	0.00	
Greenville MSA	21	2.62	4.03	4.76	17.85	28.57	45.05	23.80	33.07	42.85	3.21	0.00	7.69	3.17	1.61	
Hickory-Morganton-Lenoir MSA	16	2.00	N/A	N/A	3.81	0.00	86.28	93.75	9.91	6.25	1.43	N/A	0.00	1.62	0.00	
Jacksonville MSA	24	2.99	N/A	N/A	3.55	0.00	79.85	75.00	16.60	25.00	1.59	N/A	0.00	1.21	3.06	
Rocky Mount MSA	6	0.75	0.10	0.00	11.43	16.66	69.54	66.66	18.93	16.66	0.36	0.00	0.00	0.51	0.00	
Wilmington MSA	32	3.99	4.23	12.50	12.53	25.00	43.73	40.62	39.51	21.87	5.45	11.11	11.54	4.41	4.21	
NC Non-MSA AA	410	51.12	0.72	1.22	9.30	12.68	63.27	64.15	26.71	21.95	5.94	13.64	5.43	7.11	3.56	

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: NORTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	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-Scope Review:															
Greensboro--Winston-Salem--High Point MSA	1,586	23.02	1.03	0.56	10.92	6.11	62.97	46.59	25.08	46.72	1.65	0.87	0.88	1.47	2.48
Raleigh-Durham-Chapel Hill MSA	1,332	19.32	1.37	0.52	17.47	5.33	47.06	38.99	34.10	55.14	1.48	0.71	0.53	1.12	2.46
Limited-Scope Review:															
Asheville MSA	409	5.94	0.37	0.24	12.19	9.04	71.05	61.85	16.37	28.85	2.21	1.89	2.03	1.95	3.52
Fayetteville MSA	83	1.20	0.85	0.00	10.19	7.22	69.03	46.98	19.93	45.78	0.29	0.00	0.00	0.15	0.89
Goldsboro MSA	121	1.76	0.10	0.00	5.77	2.47	77.10	66.11	17.03	31.40	1.02	0.00	0.00	0.73	3.07
Greenville MSA	201	2.92	4.03	2.48	17.85	8.45	45.05	31.84	33.07	57.21	2.97	2.41	3.66	2.10	3.76
Hickory-Morganton-Lenoir MSA	183	2.66	N/A	N/A	3.81	1.09	86.28	81.42	9.91	17.48	0.88	N/A	0.00	0.83	1.66
Jacksonville MSA	110	1.60	N/A	N/A	3.55	1.81	79.85	76.36	16.60	21.81	1.34	N/A	1.72	1.20	1.92
Rocky Mount MSA	119	1.73	0.10	0.00	11.43	2.52	69.54	55.46	18.93	42.01	1.12	0.00	0.40	0.92	2.17
Wilmington MSA	364	5.28	4.23	3.29	12.53	4.67	43.73	38.18	39.51	53.84	2.11	0.44	1.37	1.74	2.94
NC Non-MSA AA	2,384	34.60	0.72	0.08	9.30	5.66	63.27	57.76	26.71	36.49	3.14	0.68	2.57	3.36	2.98

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		STATE: NORTH CAROLINA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Greensboro--Winston-Salem--High Point MSA	2,082	19.24	2.38	1.87	21.74	18.11	54.24	51.20	21.67	28.67	6.54	9.84	7.74	6.05	7.02	
Raleigh-Durham-Chapel Hill MSA	2,483	22.72	3.27	3.95	16.58	12.24	47.72	42.61	31.31	40.07	6.90	14.93	6.17	5.70	8.44	
Limited-Scope Review:																
Asheville MSA	497	4.57	1.17	0.80	28.37	35.81	56.47	51.11	13.99	11.67	8.62	16.67	11.56	7.70	6.51	
Fayetteville MSA	206	1.90	10.98	12.14	19.54	10.19	50.44	52.19	19.05	24.27	4.16	8.25	2.91	4.31	3.40	
Goldsboro MSA	261	2.42	6.24	3.83	16.18	12.26	53.65	57.09	23.93	26.82	8.37	12.07	8.02	7.59	10.03	
Greenville MSA	534	4.93	11.25	2.43	19.47	24.53	32.06	24.53	36.96	48.31	12.97	6.67	20.11	8.95	14.23	
Hickory-Morganton-Lenoir MSA	235	2.16	N/A	N/A	11.09	7.66	77.60	75.32	11.31	16.17	2.70	N/A	2.87	2.66	2.79	
Jacksonville MSA	310	2.87	N/A	N/A	9.93	11.29	74.66	59.03	15.41	29.68	9.25	N/A	9.64	7.47	16.14	
Rocky Mount MSA	250	2.30	1.61	0.80	11.80	8.00	53.10	60.00	33.49	30.80	5.82	5.88	6.55	5.40	6.63	
Wilmington MSA	463	4.28	11.53	12.31	16.76	10.15	41.57	30.89	30.10	46.65	5.83	6.59	5.88	4.43	7.13	
NC Non-MSA AA	3,525	32.60	1.42	0.48	13.05	11.72	58.07	57.93	27.46	29.79	8.11	5.32	9.00	8.27	7.92	

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS			STATE: NORTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
Full-Scope Review:																
Greensboro--Winston-Salem--High Point MSA	13	2.03	0.34	0.00	10.67	23.08	67.55	69.23	21.43	7.69	2.04	0.00	5.56	1.86	0.00	
Raleigh-Durham-Chapel Hill MSA	31	4.84	0.43	0.00	25.77	32.26	52.41	41.94	21.17	25.81	5.71	0.00	3.23	5.26	25.00	
Limited-Scope Review:																
Asheville MSA	3	0.47	0.42	0.00	13.39	33.33	74.48	66.67	11.72	0.00	12.00	0.00	16.67	13.33	0.00	
Fayetteville MSA	4	0.62	5.24	0.00	13.61	0.00	62.30	100.00	18.85	0.00	8.33	0.00	0.00	11.11	0.00	
Goldsboro MSA	32	5.00	0.33	0.00	3.33	0.00	87.33	78.13	9.00	21.87	8.91	0.00	0.00	8.18	16.00	
Greenville MSA	70	10.94	0.34	0.00	10.67	34.29	67.55	52.86	21.43	12.86	30.19	0.00	40.00	28.43	25.93	
Hickory-Morganton-Lenoir MSA	3	0.47	N/A	N/A	1.86	0.00	91.16	100.00	6.98	0.00	6.25	N/A	0.00	6.25	0.00	
Jacksonville MSA	17	2.65	N/A	N/A	4.61	0.00	89.47	94.12	5.92	5.88	19.61	N/A	0.00	19.61	100.00	
Rocky Mount MSA	55	8.59	0.31	0.00	7.36	0.00	78.83	94.55	13.50	5.45	15.64	0.00	0.00	16.59	7.14	
Wilmington MSA	3	0.47	5.52	33.33	7.36	0.00	47.24	0.00	39.88	66.67	11.76	0.00	0.00	0.00	20.00	
NC Non-MSA AA	409	63.90	0.36	0.00	13.30	20.54	66.51	67.97	19.83	11.49	16.68	0.00	15.20	17.68	14.37	

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

BORROWER DISTRIBUTION: HOME PURCHASE		STATE: NORTH CAROLINA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Greensboro--Winston-Salem--High Point MSA	2,261	25.46	18.50	6.10	18.34	24.50	24.62	20.26	38.54	49.14	2.61	1.64	3.24	2.19	3.99	
Raleigh-Durham-Chapel Hill MSA	2,099	23.62	18.68	6.24	17.43	24.63	24.42	20.96	39.47	48.12	1.89	1.66	2.26	1.62	2.91	
Limited-Scope Review:																
Asheville MSA	567	6.38	19.39	3.35	18.06	16.04	24.77	25.75	37.75	54.85	3.22	0.92	2.61	3.58	5.37	
Fayetteville MSA	46	0.52	18.48	0.00	19.67	8.70	22.38	13.04	39.45	78.26	0.22	0.00	0.09	0.07	0.58	
Goldsboro MSA	71	0.80	19.63	5.63	17.63	19.72	23.59	16.90	39.13	57.75	1.04	1.20	1.55	0.74	1.35	
Greenville MSA	477	5.37	24.29	5.45	16.18	25.16	19.25	24.11	40.26	45.28	4.14	1.15	5.47	4.31	6.15	
Hickory-Morganton-Lenoir MSA	326	3.67	16.23	5.21	18.07	16.87	27.55	19.94	38.13	57.98	1.68	0.93	1.64	1.28	3.01	
Jacksonville MSA	83	0.93	14.86	0.00	20.66	8.44	26.41	13.25	38.05	78.31	0.88	0.00	0.52	0.86	1.55	
Rocky Mount MSA	310	3.49	21.28	2.58	17.72	15.16	20.76	26.45	40.22	55.81	3.83	1.06	3.13	3.78	7.19	
Wilmington MSA	356	4.00	19.63	3.93	15.81	21.07	21.78	17.42	42.76	57.30	2.47	1.61	4.29	1.90	3.33	
NC Non-MSA AA	2,288	25.76	19.72	3.50	16.83	12.98	21.98	19.71	41.45	63.81	3.04	1.32	2.33	3.12	4.78	

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.02% of loans originated by the bank in North Carolina.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

BORROWER DISTRIBUTION: HOME IMPROVEMENT			STATE: NORTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Borrower Income****				
MSA/AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***						
Full-Scope Review:																
Greensboro--Winston-Salem--High Point MSA	127	15.64	18.50	21.26	18.34	23.62	24.62	25.20	38.54	28.35	1.56	1.63	2.15	1.60	1.01	
Raleigh-Durham-Chapel Hill MSA	106	13.27	18.68	25.47	17.43	12.26	24.42	16.04	39.47	46.23	1.46	3.38	0.56	1.08	1.90	
Limited-Scope Review:																
Asheville MSA	35	4.38	19.39	14.29	18.06	25.71	24.77	31.43	37.75	28.57	4.61	3.70	5.41	4.35	4.90	
Fayetteville MSA	11	1.38	18.48	0.00	19.67	0.00	22.38	36.36	39.45	63.64	0.44	0.00	0.00	0.55	0.59	
Goldsboro MSA	14	1.75	19.63	21.43	17.63	28.57	23.59	21.43	39.13	28.57	3.62	7.69	3.70	5.13	1.96	
Greenville MSA	21	2.63	24.29	9.52	16.18	19.05	19.25	19.05	40.26	52.38	3.21	0.00	4.55	2.13	4.69	
Hickory-Morganton-Lenoir MSA	16	2.00	16.23	0.00	18.07	31.25	27.55	12.50	38.13	56.25	1.43	0.00	1.02	0.62	3.18	
Jacksonville MSA	24	3.00	14.86	12.50	20.66	8.33	26.41	16.67	38.05	62.50	1.59	8.33	0.00	1.64	1.52	
Rocky Mount MSA	6	0.75	21.28	0.00	17.72	0.00	20.76	50.00	40.22	50.00	0.36	0.00	0.00	0.00	1.08	
Wilmington MSA	32	4.01	19.63	28.13	15.81	9.38	21.78	28.12	42.76	34.37	5.45	9.09	5.00	5.88	5.04	
NC Non-MSA AA	410	51.19	19.46	14.15	16.67	22.68	21.93	19.27	41.94	43.66	5.94	4.94	7.02	4.62	7.02	

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census information.  
 (\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.38% of loans originated by the bank in North Carolina.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: NORTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Greensboro--Winston-Salem--High Point MSA	1,586	23.02	18.50	5.68	18.34	14.00	24.62	18.85	38.54	60.84	1.65	1.09	1.42	1.66	3.37
Raleigh-Durham-Chapel Hill MSA	1,332	19.25	18.68	6.08	17.43	13.29	24.42	20.27	39.47	59.31	1.48	1.18	1.56	1.55	2.74
Limited-Scope Review:															
Asheville MSA	409	5.96	19.39	3.91	18.06	14.18	24.77	26.16	37.75	55.50	2.21	0.84	2.30	2.51	3.54
Fayetteville MSA	83	1.20	18.48	0.00	19.67	7.23	22.38	15.66	39.45	75.90	0.29	0.00	0.15	0.20	0.84
Goldsboro MSA	121	1.77	19.63	4.96	17.63	19.01	23.59	19.01	39.13	57.02	1.02	0.64	1.02	1.42	1.70
Greenville MSA	201	2.91	24.29	4.48	16.18	9.95	19.25	20.90	40.26	63.68	2.97	2.40	3.66	3.76	4.19
Hickory-Morganton-Lenoir MSA	183	2.67	16.23	5.46	18.07	14.21	27.55	19.13	38.13	61.20	0.88	0.49	0.40	0.50	2.28
Jacksonville MSA	110	1.58	14.86	0.91	20.66	6.36	26.41	16.36	38.05	74.55	1.34	1.61	1.10	2.13	1.92
Rocky Mount MSA	119	1.68	21.28	3.36	17.72	10.93	20.76	21.85	40.22	60.50	1.12	0.45	0.82	0.96	2.29
Wilmington MSA	364	5.30	19.63	7.42	15.81	12.91	21.78	18.41	42.76	60.99	2.11	1.88	2.93	1.91	3.18
NC Non-MSA AA	2,384	34.65	19.46	3.73	16.67	11.41	21.92	22.57	41.93	61.79	3.14	2.66	3.38	3.60	4.78

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.69% of loans originated by the bank in North Carolina.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES STATE: NORTH CAROLINA EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Greensboro--Winston-Salem--High Point MSA	2,082	19.20	70.58	61.53	76.71	11.00	12.30	6.54	6.79
Raleigh-Durham-Chapel Hill MSA	2,483	22.89	69.61	61.66	78.49	10.59	10.91	6.90	7.15
Limited-Scope Review:									
Asheville MSA	497	4.56	72.70	67.61	78.27	10.66	11.67	8.62	9.71
Fayetteville MSA	206	1.89	72.51	62.62	72.33	16.99	10.68	4.16	3.98
Goldsboro MSA	261	2.41	72.64	69.35	81.23	9.96	8.81	8.37	7.85
Greenville MSA	534	4.92	69.13	64.79	75.84	10.11	14.04	12.97	12.56
Hickory-Morganton-Lenoir MSA	235	2.15	68.60	55.32	66.38	12.34	21.28	2.70	1.84
Jacksonville MSA	310	2.86	73.34	79.03	84.52	10.32	5.16	9.25	10.25
Rocky Mount MSA	250	2.30	68.98	52.00	68.40	18.40	13.20	5.82	5.36
Wilmington MSA	463	4.28	72.23	68.47	76.46	11.88	11.66	5.83	6.40
NC Non-MSA AA	3,525	32.53	74.10	69.96	80.20	11.94	7.86	8.11	8.23

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 9.64% of small loans to businesses originated by the bank in North Carolina.

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms**

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS STATE: NORTH CAROLINA EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Farms**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Greensboro--Winston-Salem--High Point MSA	13	2.03	95.22	23.08	69.23	30.77	0.00	2.04	0.00
Raleigh-Durham-Chapel Hill MSA	31	4.84	94.02	48.39	74.19	19.35	6.45	5.71	3.27
Limited-Scope Review:									
Asheville MSA	3	0.47	92.05	0.00	100.00	0.00	0.00	12.00	0.00
Fayetteville MSA	4	0.62	91.67	50.00	75.00	25.00	0.00	8.33	4.88
Goldsboro MSA	32	5.00	89.67	84.38	68.75	18.75	12.50	8.91	8.30
Greenville MSA	70	10.94	91.58	77.14	61.43	27.14	11.43	30.19	25.71
Hickory-Morganton-Lenoir MSA	3	0.47	95.35	0.00	66.67	33.33	0.00	6.25	0.00
Jacksonville MSA	17	2.65	92.76	47.06	82.35	11.76	5.88	19.61	13.95
Rocky Mount MSA	55	8.59	92.02	45.45	50.91	30.91	18.18	15.64	10.05
Wilmington MSA	3	0.47	90.80	33.33	100.00	0.00	0.00	11.76	0.00
NC Non-MSA AA	409	63.90	93.63	77.75	67.73	24.45	7.82	16.68	14.81

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 16.25% of small loans to farms originated by the bank in North Carolina.

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: NORTH CAROLINA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000			
MSA/AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope Review:									
Greensboro--Winston-Salem--High Point MSA	5	1,411	117	15,456	120	16,867	36.73	2	591
Raleigh-Durham-Chapel Hill MSA	4	508	87	10,340	89	10,848	23.63	2	423
Limited-Scope Review:									
Asheville MSA	3	36	51	2,324	52	2,360	5.14	2	93
Fayetteville MSA	3	7	17	415	18	422	0.92	2	18
Goldsboro MSA	3	11	21	660	22	671	1.46	2	28
Greenville MSA	3	25	15	1,543	16	1,568	3.42	2	65
Hickory-Morganton-Lenoir MSA	3	16	22	1,036	23	1,052	2.29	2	42
Jacksonville MSA	3	10	15	611	16	621	1.35	2	26
Rocky Mount MSA	3	12	17	701	18	713	1.55	2	31
Wilmington MSA	4	128	21	1,644	23	1,772	3.86	2	70
NC Non-MSA AA	3	144	107	8,876	108	9,020	19.65	2	367

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the evaluation date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
								State: NORTH CAROLINA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
MSA/AA:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	% Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope Review:																	
Greensboro--Winston-Salem--High Point MSA	45.56	38	24.36	5.26	21.05	44.74	28.95	6	1	0	-1	-2	-2	3.23	15.06	60.07	21.64
Raleigh-Durham-Chapel Hill MSA	18.47	31	19.87	12.90	9.68	35.48	41.94	2	4	0	0	+1	+1	6.17	19.31	44.47	29.40
Limited-Scope Review:																	
Asheville MSA	5.65	12	7.69	0.00	33.33	58.33	8.33	0	0	0	0	0	0	0.80	15.49	69.15	14.55
Fayetteville MSA	1.09	3	1.92	0.00	0.00	66.67	33.33	1	1	0	-1	0	+1	1.90	26.09	56.93	15.08
Goldsboro MSA	1.53	3	1.92	0.00	33.34	33.33	33.33	1	0	0	0	-1	0	0.47	8.35	76.58	14.60
Greenville MSA	2.23	5	3.21	0.00	40.00	0.00	60.00	0	0	0	0	0	0	7.94	20.18	39.80	32.09
Hickory-Morganton-Lenoir MSA	1.90	4	2.57	N/A	0.00	100.00	0.00	0	0	0	0	0	0	N/A	5.07	85.39	9.54
Jacksonville MSA	0.87	3	1.92	N/A	66.67	0.00	33.33	0	0	0	0	0	0	N/A	11.22	59.91	28.87
Rocky Mount MSA	1.06	3	1.92	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.25	14.89	66.68	18.18
Wilmington MSA	3.36	7	4.49	14.29	0.00	42.86	42.86	1	0	-1	0	0	0	7.49	16.68	41.31	34.52
NC Non-MSA AA	18.30	47	30.13	0.00	18.75	47.92	33.33	7	0	0	-2	-5	0	1.68	11.35	62.27	24.70

**Table 1. Lending Volume**

LENDING VOLUME		State: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MSA/AA:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope Review:												
Greenville-Spartanburg-Anderson MSA	27.01	3,234	386,548	1,820	176,503	10	572	33	55,910	5,097	619,533	25.67
Limited-Scope Review:												
Charleston-North Charleston MSA	20.17	2,525	527,007	1,261	121,681	5	70	15	49,569	3,806	698,327	14.77
Columbia MSA	15.91	1,774	230,079	1,107	109,915	11	502	112	229,064	3,004	569,560	23.12
Florence MSA	4.71	596	49,324	270	20,355	8	438	16	8,045	890	78,162	4.23
Myrtle Beach MSA	7.17	996	116,727	341	48,044	2	25	14	4,807	1,353	169,603	5.83
Sumter MSA	3.32	333	29,628	269	22,469	19	3,039	5	8,662	626	63,798	2.56
SC Non-MSA AA	21.71	2,285	275,980	1,684	150,849	76	8,053	54	16,171	4,099	451,053	23.83

(\*) Rated area refers to either the state or Multi-state MSA rating area.

(\*\*) The evaluation period for Community Development Loans is January 1, 1998 to December 31, 2000.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or Multi-state MSA rating area.

**Table 2. Geographic Distribution of Home Purchase Loans**

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		STATE: SOUTH CAROLINA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	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	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Greenville-Spartanburg-Anderson MSA	1,834	27.28	0.82	0.22	13.32	8.34	63.63	52.18	22.23	39.26	2.42	1.39	2.72	2.21	2.69	
Limited-Scope Review:																
Charleston-North Charleston MSA	1,650	24.54	1.69	0.67	14.89	4.42	53.25	31.15	30.17	63.76	3.40	0.97	1.33	2.24	5.14	
Columbia MSA	1,194	17.76	1.57	0.59	19.05	7.29	47.32	44.22	32.06	47.90	2.77	5.36	1.75	2.62	3.19	
Florence MSA	273	4.06	4.40	0.00	21.32	13.55	44.14	28.57	30.14	57.88	3.86	0.00	3.57	2.93	4.91	
Myrtle Beach MSA	605	9.00	1.59	0.33	13.69	1.65	69.31	77.85	15.41	20.17	2.56	1.89	0.63	3.06	1.92	
Sumter MSA	211	3.14	N/A	N/A	26.00	5.21	44.07	26.54	29.93	68.25	3.61	N/A	0.93	1.77	7.00	
SC Non-MSA AA	957	14.22	0.11	0.00	14.67	7.11	64.58	39.08	20.64	53.71	1.71	0.00	1.25	1.48	2.10	

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT			STATE: SOUTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans						
Full-Scope Review:																
Greenville-Spartanburg-Anderson MSA	282	25.16	0.82	1.41	13.32	15.96	63.63	70.57	22.23	12.06	4.15	0.00	4.81	4.43	3.00	
Limited-Scope Review:																
Charleston-North Charleston MSA	128	11.42	1.69	2.35	14.89	19.53	53.25	51.56	30.17	26.56	5.06	0.00	6.05	4.97	4.79	
Columbia MSA	105	9.37	1.57	0.96	19.05	24.76	47.32	49.52	32.06	24.76	3.69	7.14	5.43	3.61	2.79	
Florence MSA	82	7.31	4.40	3.66	21.32	39.02	44.14	36.59	30.14	20.73	14.84	28.57	14.29	17.81	8.70	
Myrtle Beach MSA	40	3.57	1.59	0.00	13.69	10.00	69.31	80.00	15.41	10.00	2.47	0.00	4.17	1.95	3.85	
Sumter MSA	47	4.19	N/A	N/A	26.00	23.40	44.07	57.45	29.93	19.15	8.74	N/A	5.26	12.63	4.00	
SC Non-MSA AA	437	38.98	0.11	0.00	14.67	14.19	64.58	65.67	20.64	19.91	8.08	0.00	5.36	9.15	6.85	

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: SOUTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	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-Scope Review:															
Greenville-Spartanburg-Anderson MSA	1,110	28.69	0.82	0.63	13.32	6.13	63.63	56.39	22.23	36.85	1.57	1.70	0.77	1.47	2.15
Limited-Scope Review:															
Charleston-North Charleston MSA	742	19.18	1.69	0.67	14.89	7.14	53.25	39.76	30.17	52.43	2.09	2.53	1.58	1.65	2.76
Columbia MSA	470	12.15	1.57	0.85	19.05	13.40	47.32	41.28	32.06	44.47	0.96	0.66	1.05	0.83	1.10
Florence MSA	239	6.18	4.40	1.26	21.32	34.73	44.14	35.56	30.14	28.45	3.97	2.86	5.72	3.75	3.34
Myrtle Beach MSA	350	9.04	1.59	1.14	13.69	2.86	69.31	76.00	15.41	20.00	1.89	0.00	0.22	2.09	2.14
Sumter MSA	73	1.89	N/A	N/A	26.00	8.22	44.07	21.92	29.93	69.86	1.00	N/A	0.45	0.82	1.60
SC Non-MSA AA	885	22.87	0.11	0.00	14.67	9.94	64.58	49.72	20.64	40.34	1.81	0.00	1.79	1.75	1.92

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		STATE: SOUTH CAROLINA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Greenville-Spartanburg-Anderson MSA	1,820	26.95	5.78	6.65	15.14	10.00	54.40	51.37	24.12	31.48	7.56	14.55	6.94	7.39	7.23	
Limited-Scope Review:																
Charleston-North Charleston MSA	1,261	18.68	4.31	4.36	17.42	15.70	46.06	47.50	31.86	32.28	9.29	8.98	10.62	10.36	7.80	
Columbia MSA	1,107	16.40	9.34	7.59	23.96	23.31	41.46	35.59	25.20	33.15	5.39	7.99	6.44	4.63	5.22	
Florence MSA	270	4.00	6.73	7.41	20.17	20.00	46.96	39.26	26.14	32.96	5.84	8.06	5.85	5.56	5.81	
Myrtle Beach MSA	341	5.05	1.24	0.59	16.75	9.97	60.45	60.70	21.55	28.45	2.00	0.00	1.67	1.88	2.70	
Sumter MSA	269	3.98	N/A	N/A	38.31	30.48	32.15	40.15	29.55	29.37	11.71	N/A	11.59	13.26	10.63	
SC Non-MSA AA	1,684	24.94	1.28	0.06	17.05	11.64	54.08	50.06	27.56	37.71	7.96	0.00	7.52	7.51	9.30	

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS			STATE: SOUTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Geography ***				
MSA/AA:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
Full-Scope Review:																
Greenville-Spartanburg-Anderson MSA	10	7.63	1.42	0.00	11.90	10.00	68.95	70.00	17.59	20.00	6.76	0.00	0.00	8.16	5.88	
Limited-Scope Review:																
Charleston-North Charleston MSA	5	3.82	1.02	0.00	17.83	20.00	56.15	80.00	25.00	0.00	6.49	0.00	2.86	11.76	0.00	
Columbia MSA	11	8.39	1.34	0.00	28.07	27.27	48.74	45.45	21.85	27.27	8.16	0.00	8.82	7.14	9.52	
Florence MSA	8	6.11	1.01	0.00	34.68	37.50	48.15	50.00	16.16	12.50	2.98	0.00	0.00	6.15	12.50	
Myrtle Beach MSA	2	1.53	0.55	0.00	35.34	0.00	60.27	100.00	3.84	0.00	0.23	0.00	0.00	0.61	0.00	
Sumter MSA	19	14.50	N/A	N/A	19.75	0.00	63.69	94.74	16.56	5.26	28.57	N/A	0.00	31.25	20.00	
SC Non-MSA AA	76	58.02	0.44	0.00	17.05	10.53	64.59	72.37	17.92	17.10	8.92	0.00	3.05	10.93	12.96	

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

BORROWER DISTRIBUTION: HOME PURCHASE		STATE: SOUTH CAROLINA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Greenville-Spartanburg-Anderson MSA	1,834	27.28	19.47	8.40	17.94	25.03	23.79	23.88	38.80	42.64	2.42	2.62	3.06	2.40	3.11	
Limited-Scope Review:																
Charleston-North Charleston MSA	1,650	24.54	20.12	2.24	17.55	12.12	23.03	14.12	39.30	71.46	3.40	1.04	2.39	2.49	6.00	
Columbia MSA	1,194	17.76	19.48	8.13	17.75	27.97	24.35	25.21	38.41	38.61	2.77	3.08	4.42	3.47	3.54	
Florence MSA	273	4.06	23.57	4.76	16.21	19.41	19.24	24.18	40.98	51.65	3.86	0.85	2.89	4.18	7.64	
Myrtle Beach MSA	605	9.00	19.34	3.63	18.63	17.69	23.33	16.86	38.70	61.82	2.56	2.81	3.05	2.52	3.23	
Sumter MSA	211	3.14	21.38	3.79	17.88	14.69	21.14	28.44	39.60	53.08	3.61	1.04	3.30	5.44	5.58	
SC Non-MSA AA	957	14.22	21.35	2.40	16.40	14.53	20.88	17.55	41.37	65.52	1.71	0.74	1.61	1.87	2.53	

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.04% of loans originated by the bank in South Carolina.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

BORROWER DISTRIBUTION: HOME IMPROVEMENT			STATE: SOUTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Greenville-Spartanburg-Anderson MSA	282	25.16	19.47	26.60	17.94	30.50	23.79	18.79	38.80	23.40	4.15	7.49	5.42	2.50	3.11	
Limited-Scope Review:																
Charleston-North Charleston MSA	128	11.42	20.12	18.75	17.55	26.56	23.03	15.63	39.30	39.06	5.06	6.67	8.46	3.23	4.71	
Columbia MSA	105	9.37	19.48	10.48	17.75	27.62	24.35	32.38	38.41	29.52	3.69	2.76	5.81	4.83	2.28	
Florence MSA	82	7.31	23.57	17.07	16.21	20.73	19.24	24.39	40.98	36.59	14.84	25.93	14.89	12.24	14.58	
Myrtle Beach MSA	40	3.57	19.34	15.00	18.63	27.50	23.33	12.50	38.70	45.00	2.47	4.88	3.77	1.32	2.06	
Sumter MSA	47	4.19	21.38	23.40	17.88	23.40	21.14	12.77	39.60	40.43	8.74	20.00	6.67	5.41	8.24	
SC Non-MSA AA	437	38.98	21.35	16.70	16.40	26.32	20.88	24.26	41.37	32.72	8.08	11.81	9.07	8.24	6.95	

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census information.  
 (\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.26% of loans originated by the bank in South Carolina.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: SOUTH CAROLINA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Greenville-Spartanburg-Anderson MSA	1,110	28.69	19.47	7.66	17.94	16.04	23.79	22.79	38.80	52.97	1.57	1.29	1.44	1.66	2.88
Limited-Scope Review:															
Charleston-North Charleston MSA	742	19.18	20.12	2.56	17.55	11.73	23.03	20.35	39.30	65.55	2.09	1.58	2.04	2.19	3.44
Columbia MSA	470	12.15	19.48	8.09	17.75	17.23	24.35	24.26	38.41	48.72	0.96	1.28	0.70	1.34	1.70
Florence MSA	239	6.18	23.57	6.69	16.21	17.99	19.24	21.34	40.98	53.14	3.97	2.86	3.88	5.59	6.46
Myrtle Beach MSA	350	9.04	19.34	6.29	18.63	14.57	23.33	20.29	38.70	58.28	1.89	2.29	2.36	1.50	2.73
Sumter MSA	73	1.89	21.38	4.11	17.88	13.70	21.14	16.44	39.60	63.01	1.00	0.81	1.49	0.85	1.93
SC Non-MSA AA	885	22.87	21.35	4.74	16.40	13.90	20.88	20.90	41.37	59.77	1.81	1.17	1.66	1.94	3.05

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.83% of loans originated by the bank in South Carolina.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES STATE: SOUTH CAROLINA EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Greenville-Spartanburg-Anderson MSA	1,820	26.95	69.22	64.23	78.63	10.60	10.77	7.59	7.19
Limited-Scope Review:									
Charleston-North Charleston MSA	1,261	18.68	70.37	61.06	75.97	14.12	9.91	9.29	9.06
Columbia MSA	1,107	16.40	69.07	66.03	77.42	11.47	11.11	5.39	5.46
Florence MSA	270	4.00	70.82	71.85	84.07	9.26	6.67	5.84	6.33
Myrtle Beach MSA	341	5.05	73.66	58.94	70.97	10.26	18.77	2.00	1.36
Sumter MSA	269	3.98	73.51	61.34	78.07	14.50	7.43	11.71	11.16
SC Non-MSA AA	1,684	24.94	73.50	69.06	79.81	10.93	9.26	7.96	7.69

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.82% of small loans to businesses originated by the bank in South Carolina.

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms**

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		STATE: SOUTH CAROLINA DECEMBER 31, 2000			EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Farms**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Greenville-Spartanburg-Anderson MSA	10	7.63	91.59	30.00	80.00	20.00	0.00	6.76	3.08
Limited-Scope Review:									
Charleston-North Charleston MSA	5	3.82	90.78	0.00	100.00	0.00	0.00	6.49	0.00
Columbia MSA	11	8.39	94.62	18.18	81.82	9.09	9.09	8.16	2.41
Florence MSA	8	6.11	93.94	75.00	87.50	12.50	0.00	2.98	1.88
Myrtle Beach MSA	2	1.53	94.79	0.00	100.00	0.00	0.00	0.23	0.00
Sumter MSA	19	14.50	94.27	84.21	63.16	0.00	36.84	28.57	29.17
SC Non-MSA AA	76	58.02	93.28	72.37	61.84	31.58	6.58	8.92	6.99

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 27.48% of small loans to farms originated by the bank in South Carolina.

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: SOUTH CAROLINA			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope Review:									
Greenville-Spartanburg-Anderson MSA	5	1,093	36	10,595	41	11,688	22.29	0	0
Limited-Scope Review:									
Charleston-North Charleston MSA	4	816	17	10,872	21	11,688	22.29	0	0
Columbia MSA	6	1,405	51	10,848	57	12,253	23.37	0	0
Florence MSA	5	160	15	1,540	20	1,700	3.24	0	0
Myrtle Beach MSA	5	278	10	2,628	15	2,906	5.54	0	0
Sumter MSA	5	117	11	1,126	16	1,243	2.37	0	0
SC Non-MSA AA	6	1,263	84	9,695	90	10,958	20.90	0	0

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the evaluation date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
								State: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
MSA/AA:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	% Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope Review:																	
Greenville-Spartanburg-Anderson MSA	25.67	26	24.76	7.69	3.85	53.85	34.62	8	0	0	-1	-6	-1	2.05	15.72	60.28	21.93
Limited-Scope Review:																	
Charleston-North Charleston MSA	14.77	16	15.24	0.00	25.00	56.25	18.75	0	1	0	0	+1	0	4.08	17.88	50.35	26.43
Columbia MSA	23.12	18	17.14	11.11	22.22	16.67	50.00	1	0	0	-1	0	0	5.66	22.65	45.28	26.25
Florence MSA	4.23	5	4.76	0.00	20.00	40.00	40.00	0	0	0	0	0	0	7.90	23.17	42.75	26.19
Myrtle Beach MSA	5.83	5	4.76	0.00	20.00	60.00	20.00	0	0	0	0	0	0	2.28	14.58	69.29	13.85
Sumter MSA	2.56	3	2.86	N/A	33.33	33.33	33.33	0	0	0	0	0	0	N/A	41.44	35.36	23.20
SC Non-MSA AA	23.83	32	30.48	0.00	22.58	48.39	29.03	3	1	0	0	-2	0	0.30	17.34	63.66	18.70

**Table 1. Lending Volume**

LENDING VOLUME		State: VIRGINIA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MSA/AA:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope Review:												
Norfolk-Virginia Beach-Newport News MSA	23.00	2,096	237,372	2,537	246,135	13	1,534	38	60,896	4,684	545,937	18.58
Richmond-Petersburg MSA	20.59	1,977	197,928	2,143	167,149	6	164	68	150,671	4,194	515,912	28.61
Limited-Scope Review:												
Charlottesville MSA	6.18	649	109,930	583	64,235	3	248	24	12,848	1,259	187,261	5.62
Danville MSA	1.51	248	13,741	59	5,292	1	25	0	0	308	19058	0.01
Johnson City-Kingsport-Bristol MSA	0.95	133	10,501	58	6,921	2	38	0	0	193	17,460	1.19
Lynchburg MSA	10.24	1,108	75,399	967	80,267	10	271	1	208	2,086	156,145	10.14
Roanoke MSA	3.69	328	46,670	420	48,881	0	0	3	7,188	751	102,739	3.90
Washington, D.C. MSA	15.77	1,168	137,950	2,016	174,829	0	0	28	27,023	3,212	339,802	18.27
VA Non-MSA AA	18.07	2,284	170,859	1,344	105,228	46	3,164	7	22,133	3,681	301,384	13.68

(\*) Rated area refers to either the state or Multi-state MSA rating area.

(\*\*) The evaluation period for Community Development Loans is January 1, 1998 to December 31, 2000.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or Multi-state MSA rating area.

**Table 2. Geographic Distribution of Home Purchase Loans**

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE				STATE: VIRGINIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	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	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Norfolk-Virginia Beach-Newport News MSA	731	25.77	2.76	2.05	11.16	6.16	52.28	46.10	33.80	45.69	0.54	0.44	0.22	0.48	0.70
Richmond-Petersburg MSA	641	22.59	3.79	0.94	15.00	9.20	47.19	35.57	34.02	54.29	0.66	0.27	0.65	0.53	0.80
Limited-Scope Review:															
Charlottesville MSA	209	7.37	1.06	0.96	9.87	4.78	53.47	52.63	35.60	41.63	1.52	9.52	0.37	1.41	1.87
Danville MSA	40	1.41	0.52	0.00	38.76	7.50	38.01	85.00	22.71	7.50	0.59	0.00	0.41	0.83	0.00
Johnson City-Kingsport-Bristol MSA	43	1.52	N/A	N/A	21.03	23.26	69.47	62.79	9.50	13.95	1.39	N/A	0.00	1.90	0.00
Lynchburg MSA	243	8.57	0.98	0.00	6.25	2.88	77.94	76.95	14.83	20.16	1.37	0.00	1.42	1.30	1.66
Roanoke MSA	115	4.05	1.89	2.61	10.86	7.83	55.86	37.39	31.39	52.17	0.76	1.61	0.91	0.43	1.14
Washington, D.C. MSA	292	10.29	0.01	0.00	11.63	26.37	52.22	45.21	36.14	28.42	0.07	0.00	0.18	0.06	0.06
VA Non-MSA AA	523	18.43	0.01	0.00	6.84	3.44	73.78	63.48	19.37	33.08	1.30	0.00	0.81	1.42	1.13

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loans**

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT				STATE: VIRGINIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000								
MSA/AA:	Total Home Improvement 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-Scope Review:																
Norfolk-Virginia Beach-Newport News MSA	305	19.99	2.76	6.23	11.16	11.15	52.28	48.52	33.80	34.10	1.51	5.38	1.98	1.49	1.18	
Richmond-Petersburg MSA	322	21.10	3.79	3.11	15.00	22.67	47.19	46.89	34.02	27.33	2.87	0.66	3.24	2.94	2.91	
Limited-Scope Review:																
Charlottesville MSA	68	4.46	1.06	1.47	9.87	8.82	53.47	61.76	35.60	27.94	3.71	14.29	3.17	3.53	3.91	
Danville MSA	45	2.95	0.52	2.22	38.76	0.00	38.01	95.56	22.71	2.22	5.09	0.00	0.00	7.11	0.00	
Johnson City-Kingsport-Bristol MSA	7	0.46	N/A	N/A	21.03	28.57	69.47	57.14	9.50	14.29	1.34	N/A	1.69	0.68	5.88	
Lynchburg MSA	182	11.93	0.98	1.65	6.25	8.79	77.94	79.67	14.83	9.89	6.25	12.50	6.98	7.05	2.24	
Roanoke MSA	37	2.42	1.89	0.00	10.86	2.70	55.86	67.57	31.39	29.73	1.18	0.00	0.99	1.40	1.02	
Washington, D.C. MSA	170	11.14	0.01	0.00	11.63	46.47	52.22	38.24	36.14	15.29	0.73	0.00	3.06	0.54	0.14	
VA Non-MSA AA	390	25.55	0.01	0.00	6.84	8.46	73.78	77.95	19.37	13.59	6.17	0.00	12.63	6.47	4.11	

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: VIRGINIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	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-Scope Review:															
Norfolk-Virginia Beach-Newport News MSA	1,049	18.80	2.76	1.72	11.16	7.05	52.28	45.66	33.80	45.57	1.21	0.91	1.07	1.15	1.36
Richmond-Petersburg MSA	1,006	18.03	3.79	1.69	15.00	14.31	47.19	43.34	34.02	40.66	1.61	0.86	1.95	1.59	1.58
Limited-Scope Review															
Charlottesville MSA	358	6.42	1.06	1.40	9.87	3.91	53.47	55.87	35.60	38.83	2.82	0.00	2.08	2.68	3.44
Danville MSA	162	2.90	0.52	0.00	38.76	4.94	38.01	87.65	22.71	7.41	4.49	0.00	0.32	6.56	1.78
Johnson City-Kingsport-Bristol MSA	82	1.47	N/A	N/A	21.03	17.07	69.47	62.20	9.50	20.73	5.06	N/A	4.83	4.15	12.50
Lynchburg MSA	681	12.21	0.98	0.15	6.25	5.14	77.94	81.06	14.83	13.65	7.03	2.08	4.74	7.83	4.85
Roanoke MSA	171	3.07	1.89	2.92	10.86	4.09	55.86	49.12	31.39	43.86	1.23	0.00	0.20	1.03	2.04
Washington, D.C. MSA	703	12.60	0.01	0.00	11.63	32.29	52.22	44.67	36.14	22.90	0.43	0.00	1.41	0.40	0.23
VA Non-MSA AA	1,367	24.50	0.01	0.00	6.84	7.02	73.78	66.93	19.37	26.04	3.15	0.00	6.10	3.28	2.50

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Owner-occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		STATE: VIRGINIA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full-Scope Review:																
Norfolk-Virginia Beach-Newport News MSA	2,537	25.05	3.87	3.67	15.85	13.24	49.31	42.33	30.53	40.13	10.78	12.50	11.58	9.70	11.96	
Richmond-Petersburg MSA	2,143	21.16	6.56	4.99	19.14	15.03	45.23	45.31	27.55	33.69	11.18	10.96	11.66	11.53	10.63	
Limited-Scope Review:																
Charlottesville MSA	583	5.76	3.53	3.27	24.12	20.75	42.73	47.51	29.60	28.13	19.79	33.33	20.44	18.93	20.35	
Danville MSA	59	0.58	12.66	1.70	23.31	8.47	42.83	79.66	21.17	10.17	3.41	0.00	1.74	4.44	1.62	
Johnson City-Kingsport-Bristol MSA	58	0.57	N/A	N/A	9.36	22.41	75.96	74.14	14.68	3.45	3.95	N/A	7.09	4.24	0.62	
Lynchburg MSA	967	9.55	6.84	3.73	12.42	10.34	65.34	71.35	15.38	14.27	20.41	13.86	31.16	22.05	13.67	
Roanoke MSA	420	4.15	11.39	15.00	10.95	6.67	52.44	46.67	25.20	31.66	8.49	11.71	5.06	8.30	9.13	
Washington, D.C. MSA	2,016	19.91	0.12	0.00	14.53	28.87	52.36	44.24	32.88	26.59	4.42	0.00	9.87	3.63	3.44	
VA Non-MSA AA	1,344	13.27	0.00	0.00	6.63	6.25	67.63	69.49	25.58	23.51	12.60	0.00	16.94	13.69	10.03	

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms**

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS				STATE: VIRGINIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Norfolk-Virginia Beach-Newport News MSA	13	16.05	0.94	7.69	8.23	7.69	56.26	69.23	34.48	15.38	9.21	0.00	0.00	14.89	0.00
Richmond-Petersburg MSA	6	7.41	2.07	0.00	9.79	0.00	52.41	50.00	35.59	50.00	6.67	0.00	0.00	0.00	20.00
Limited-Scope Review:															
Charlottesville MSA	3	3.70	3.39	0.00	21.63	0.00	42.56	66.67	32.34	33.33	10.53	0.00	0.00	8.33	14.29
Danville MSA	1	1.23	9.38	0.00	12.50	0.00	40.63	100.00	37.50	0.00	0.68	0.00	0.00	0.76	0.00
Johnson City-Kingsport-Bristol MSA	2	2.47	N/A	N/A	18.90	0.00	68.50	100.00	12.60	0.00	1.28	N/A	0.00	1.89	0.00
Lynchburg MSA	10	12.35	1.86	0.00	3.72	0.00	79.93	100.00	14.50	0.00	31.82	0.00	0.00	33.33	0.00
Roanoke MSA	0	0.00	1.35	0.00	7.43	0.00	56.70	0.00	38.51	0.00	0.00	0.00	0.00	0.00	0.00
Washington, D.C. MSA	0	0.00	0.00	0.00	18.21	0.00	52.98	0.00	28.62	0.00	0.00	0.00	0.00	0.00	0.00
VA Non-MSA AA	46	56.79	0.00	0.00	6.81	2.17	78.31	97.83	14.88	0.00	14.29	0.00	4.00	18.06	0.00

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

BORROWER DISTRIBUTION: HOME PURCHASE		STATE: VIRGINIA					EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share (%) by Borrower Income****				
MSA/AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***						
Full-Scope Review:																
Norfolk-Virginia Beach-Newport News MSA	731	25.77	18.62	7.80	18.92	20.11	24.01	19.15	38.45	52.53	0.54	1.11	0.55	0.43	0.91	
Richmond-Petersburg MSA	641	22.59	19.17	11.54	17.95	22.93	24.41	24.02	38.47	41.03	0.66	0.96	0.96	0.68	0.87	
Limited-Scope Review:																
Charlottesville MSA	209	7.37	18.44	8.61	17.42	18.18	23.40	21.05	40.74	51.67	1.52	2.19	1.01	1.71	2.27	
Danville MSA	40	1.41	25.20	2.50	17.11	22.50	19.21	22.50	38.48	52.50	0.59	0.00	0.65	0.00	1.28	
Johnson City-Kingsport-Bristol MSA	43	1.52	21.96	0.00	19.22	20.93	21.77	46.51	37.05	32.56	1.39	0.00	1.26	3.38	0.70	
Lynchburg MSA	243	8.57	18.96	9.05	18.47	17.28	23.86	23.46	38.71	49.79	1.37	1.78	1.01	1.57	1.96	
Roanoke MSA	115	4.05	19.15	4.35	18.58	25.22	24.51	20.00	37.76	47.83	0.76	0.94	0.65	0.77	1.29	
Washington, D.C. MSA	292	10.29	13.57	18.84	17.33	20.89	25.80	18.49	43.30	41.78	0.07	0.19	0.10	0.05	0.09	
VA Non-MSA AA	523	18.43	18.36	3.44	17.23	17.02	22.40	23.52	42.01	55.83	1.30	1.10	1.24	1.42	1.84	

(\*) Home purchase loans originated in the MSA/AA as a percentage of all home purchase loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.42% of loans originated by the bank in Virginia.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loans**

BORROWER DISTRIBUTION: HOME IMPROVEMENT				STATE: VIRGINIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Norfolk-Virginia Beach-Newport News MSA	305	19.99	18.62	17.70	18.92	20.33	24.01	28.85	38.45	32.46	1.51	4.19	2.24	1.41	0.88
Richmond-Petersburg MSA	322	21.10	19.17	29.19	17.95	26.09	24.41	22.98	38.47	21.12	2.87	4.44	3.53	2.46	2.11
Limited-Scope Review:															
Charlottesville MSA	68	4.46	18.44	26.47	17.42	23.53	23.40	13.24	40.74	36.76	3.71	6.67	3.57	0.72	4.73
Danville MSA	45	2.95	25.20	15.56	17.11	22.22	19.21	35.56	38.48	26.67	5.09	4.55	9.62	5.00	3.60
Johnson City-Kingsport-Bristol MSA	7	0.46	21.96	28.57	19.22	14.29	21.77	28.57	37.05	28.57	1.34	2.94	0.00	0.00	3.03
Lynchburg MSA	182	11.93	18.96	25.82	18.47	21.98	23.86	20.88	38.71	31.32	6.25	8.41	8.45	5.73	5.08
Roanoke MSA	37	2.42	19.15	13.51	18.58	18.92	24.51	40.54	37.76	27.03	1.18	0.78	1.13	1.06	1.76
Washington, D.C. MSA	170	11.14	13.57	31.76	17.33	27.65	25.80	22.94	43.30	17.65	0.73	3.35	0.79	0.53	0.18
VA Non-MSA AA	390	25.55	18.36	16.92	17.23	23.08	22.40	26.92	42.01	32.56	6.17	7.52	5.88	7.64	5.13

(\*) Home improvement loans originated in the MSA/AA as a percentage of all home improvement loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.40% of loans originated by the bank in Virginia.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE				STATE: VIRGINIA				EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MSA/AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Scope Review:															
Norfolk-Virginia Beach-Newport News MSA	1,049	18.80	18.62	8.39	18.92	17.06	24.01	21.45	38.45	52.05	1.21	2.18	1.84	1.54	2.27
Richmond-Petersburg MSA	1,006	18.03	19.17	13.82	17.95	22.17	24.41	27.73	38.47	35.39	1.61	2.58	2.45	2.20	2.15
Limited Review:															
Charlottesville MSA	358	6.42	18.44	11.73	17.42	15.92	23.40	26.54	40.74	45.53	2.82	4.76	3.58	4.00	3.07
Danville MSA	162	2.90	25.20	8.02	17.11	17.90	19.21	24.69	38.48	49.38	4.49	5.23	4.21	4.26	7.60
Johnson City-Kingsport-Bristol MSA	82	1.47	21.96	3.66	19.22	26.83	21.77	24.39	37.05	45.12	5.06	5.77	6.19	5.05	5.90
Lynchburg MSA	681	12.21	18.96	9.54	18.47	18.80	23.86	26.87	38.71	44.20	7.03	8.73	9.29	8.56	9.17
Roanoke MSA	171	3.07	19.15	6.43	18.58	21.64	24.51	23.39	37.76	46.78	1.23	0.58	1.59	1.70	1.85
Washington, D.C. MSA	703	12.60	13.57	19.20	17.33	25.04	25.80	26.60	43.30	28.31	0.43	1.78	0.81	0.51	0.40
VA Non-MSA AA	1,367	24.50	18.36	5.85	17.23	16.24	22.40	25.97	42.01	51.72	3.15	5.23	3.65	4.10	4.10

(\*) Home mortgage refinance loans originated in the MSA/AA as a percentage of all home mortgage refinance loans originated in the rated area.

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0.67% of loans originated by the bank in Virginia.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES					STATE: VIRGINIA		EVALUATION PERIOD: JANUARY 1, 1998 TO DECEMBER 31, 2000		
MSA/AA:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Norfolk-Virginia Beach-Newport News MSA	2,537	25.05	69.06	61.14	78.48	11.12	10.40	10.78	11.22
Richmond-Petersburg MSA	2,143	21.16	66.28	65.89	82.64	9.85	7.51	11.18	13.77
Limited Review:									
Charlottesville MSA	583	5.76	70.91	63.98	74.96	13.72	11.32	19.79	19.81
Danville MSA	59	0.58	70.68	64.41	77.97	13.56	8.47	3.41	1.02
Johnson City-Kingsport-Bristol MSA	58	0.57	74.78	48.28	70.69	18.97	10.34	3.95	3.10
Lynchburg MSA	967	9.55	71.84	71.25	80.97	11.69	7.34	20.41	23.82
Roanoke MSA	420	4.15	68.71	59.52	76.43	10.00	13.57	8.49	8.97
Washington, D.C. MSA	2,016	19.91	71.09	61.06	81.50	10.42	8.08	4.42	4.88
VA Non-MSA AA	1,344	13.27	71.97	74.26	81.92	10.94	7.14	12.60	14.44

(\*) Small loans to businesses originated in the MSA/AA as a percentage of all small loans to businesses originated in the rated area.  
 (\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.  
 (\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.48% of small loans to businesses originated by the bank in Virginia.  
 (\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms**

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		STATE: VIRGINIA DECEMBER 31, 2000			EVALUATION PERIOD: JANUARY 1, 1998 TO				
MSA/AA:	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Farms**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Scope Review:									
Norfolk-Virginia Beach-Newport News MSA	13	16.05	94.43	23.08	69.23	15.38	15.38	9.21	1.64
Richmond-Petersburg MSA	6	7.41	95.03	0.00	100.00	0.00	0.00	6.67	0.00
Limited Review:									
Charlottesville MSA	3	3.70	94.38	33.33	66.67	33.33	0.00	10.53	6.25
Danville MSA	1	1.23	100.00	100.00	100.00	0.00	0.00	0.68	0.77
Johnson City-Kingsport-Bristol MSA	2	2.47	96.06	50.00	100.00	0.00	0.00	1.28	0.65
Lynchburg MSA	10	12.35	97.40	40.00	100.00	0.00	0.00	31.82	17.65
Roanoke MSA	0	0.00	94.59	0.00	0.00	0.00	0.00	0.00	0.00
Washington, D.C. MSA	0	0.00	92.51	0.00	0.00	0.00	0.00	0.00	0.00
VA Non-MSA AA	46	56.79	94.24	67.39	76.09	19.56	4.35	14.29	12.12

(\*) Small loans to farms originated in the MSA/AA as a percentage of all small loans to farms originated in the rated area.

(\*\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 33.33% of small loans to farms originated by the bank in Virginia.

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: VIRGINIA			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MSA/AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope Review:									
Norfolk-Virginia Beach-Newport News MSA	9	1,882	44	12,528	50	14,410	23.22	3	1,386
Richmond-Petersburg MSA	8	1,269	74	15,824	80	17,093	27.54	3	800
Limited-Scope Review:									
Charlottesville MSA	8	319	25	3,387	31	3,706	5.97	3	201
Danville MSA	8	16	18	180	24	196	0.32	3	10
Johnson City-Kingsport-Bristol MSA	8	44	17	459	23	503	0.81	3	28
Lynchburg MSA	8	435	26	4,618	32	5,053	8.14	3	275
Roanoke MSA	8	214	23	2,306	29	2,520	4.06	3	135
Washington, D.C. MSA	8	958	69	10,496	75	11,454	18.45	3	605
VA Non-MSA AA	9	655	67	6,478	74	7,133	11.49	3	386

(\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the evaluation date.

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: VIRGINIA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MSA/AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	% Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope Review:																	
Norfolk-Virginia Beach-Newport News MSA	18.58	52	26.67	1.92	15.38	42.31	40.38	27	79	+1	+8	+22	+21	6.38	17.47	48.59	25.72
Richmond-Petersburg MSA	28.61	42	21.53	2.38	16.67	54.76	26.19	36	78	+1	+7	+23	+11	7.28	20.48	43.79	28.30
Limited-Scope Review:																	
Charlottesville MSA	5.62	12	6.15	8.33	16.67	33.33	41.67	13	25	+1	+2	+4	+5	4.04	19.94	48.63	27.31
Danville MSA	0.01	1	0.51	0.00	0.00	100.00	0.00	2	3	0	0	+1	0	2.19	45.18	33.77	18.86
Johnson City-Kingsport-Bristol MSA	1.19	3	1.54	N/A	0.00	100.00	0.00	0	3	0	0	+3	0	N/A	21.73	70.07	8.20
Lynchburg MSA	10.11	15	7.69	6.67	6.67	60.00	26.67	7	22	+1	+1	+9	+4	2.11	10.14	73.07	14.13
Roanoke MSA	3.90	6	3.08	16.67	.00	66.67	16.67	9	15	+1	0	+4	+1	3.86	14.79	53.81	27.54
Washington, D.C. MSA	18.27	40	20.51	0.00	20.00	47.50	32.50	22	62	0	+8	+19	+13	0.21	16.37	52.44	30.98
VA Non-MSA AA	13.68	24	12.31	0.00	8.70	65.22	26.09	37	60	0	+2	+15	+6	0.01	7.03	71.00	19.98