



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

October 8, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank of Georgia
Charter Number 23937

2234 West Broad Street
Athens, GA 30606

Office of the Comptroller of the Currency
Georgia Field Office

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Atlanta, GA 30346

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to 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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- a reasonable loan-to-deposit ratio;
- a majority of primary loan products are within the assessment areas (AA);
- the distribution of loans represents a poor penetration among individuals of different income levels and businesses of different sizes;
- the geographic distribution of loans reflects an excellent dispersion in the AA; and,
- the responsiveness to community development needs and opportunities in the AA is adequate in light of its capacity and area opportunities.

Scope of Examination

National Bank of Georgia (NBG) was evaluated under the Intermediate Small Bank examination procedures, which include a lending test and a community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of its assessment areas (AAs) through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through CD lending, qualified investments, and community development services. This evaluation covers the period from January 2008 to December 2011.

The lending test's performance was evaluated based on a sample of business loans originating from January 1, 2010 through December 31, 2011, as this was representative of the bank's lending strategy since the last CRA examination.

NBG's primary credit products are home and business loans. The bank reports data under the requirements of the Home Mortgage Disclosure Act (HMDA). The HMDA data were tested and found to be reliable. Therefore, HMDA data were used to evaluate the bank's home loan performance. The evaluation period for the CD test is from January 1, 2010 through December 31, 2011.

Description of Institution

NBG is a wholly owned subsidiary of NBG Bancorp, a one bank holding company. NBG's main office is located in Athens, Clarke County, Georgia. The main office is a full service banking location with an on-site Automated Teller Machine. The bank operates with one branch located in Gainesville, Georgia.

The bank offers a variety of traditional deposit and loan products with commercial and real estate lending being its primary credit products. There are no financial conditions, legal constraints, or other factors that hinder the bank's ability to help meet the credit needs of its AA. There were no changes in the bank's corporate structure during this evaluation period.

As of June 30, 2012, NBG reported net loans of \$248 million and had a net loans and leases to total assets ratio of 82%. The loan portfolio composition is as follows:

Loan Portfolio Composition as of June 30, 2012				
Loan Type	\$ (000)	%	# of Loans	%
Home Loans	76,973	31.08	540	43.51
Business Loans	133,342	53.85	401	32.31
Consumer Loans	2,128	0.86	156	12.57
Farm Loans	30	0.01	2	0.16
Other Loans	35,154	14.20	142	11.44
TOTAL	247,627	100%	1,241	100%

There are no legal or financial impediments to NBG’s ability to meet the credit and CD needs of its AAs. The bank was rated Satisfactory at its last CRA examination dated January 28, 2008.

Description of Assessment Area

NBG defines its AA as Clarke, Hall, and portions of Oconee Counties. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geography. Clarke and Oconee Counties are in the Athens-Clarke County GA Metropolitan Statistical Area (MSA). Hall County is in the Gainesville Georgia MSA.

Athens Assessment Area

The Athens GA MSA includes Clarke, Madison, Oconee, and Oglethorpe counties. Clarke County is considered the hub of this MSA. Athens, located in Clarke County, is the MSA’s largest city. It is also the home of the University of Georgia, the nation’s oldest federal land grant university. There are 35 census tracts within this MSA consisting of 5 low-, 9 moderate-, 5 middle-, and 16 upper-income geographies. According to the 2000 US Census, the population of the Athens-Clarke County MSA was comprised of 127,714 residents and 27,706 families. Over 12 percent of families in this MSA had income considered below the poverty level. The Department of Housing and Urban Development's (HUD) updated median family income estimate is \$58,600 as of 2012.

The Athens GA MSA has a diverse industrial base that includes: manufacturing, government, education, retailing, service, and hospitality. Major international Fortune 500 companies, as well as homegrown entrepreneurs find the local business climate, educational institutions, location, and quality of life conducive to success in business.

Please see the table below for more detail demographic information on this AA:

Demographic Information for the Athens GA AA					
	#	% Low	% Moderate	% Middle	% Upper
Geographies (Census Tracts)	35	14%	26%	14%	46%
Population by Geography	127,714	14%	24%	13%	49%
Owner-Occupied Housing by	51,654	15%	33%	62%	58%
Businesses by Geography	16,595	14%	17%	13%	56%

Farms by Geography	509	4%	9%	20%	67%
Family Distribution by	27,206	22%	17%	19%	42%
Household Distribution by	48,719	17%	25%	13%	49%
Census Median Family Income (MFI)		\$45,221	Median Housing Value		\$115,062
HUD-Adjusted MFI: 2010		\$57,770	Families Below the Poverty		12%
HUD- Adjusted MFI: 2011		\$58,600	Unemployment Rate		6%

Source: 2000 US Census Data

Clarke County

Clarke County is located in northeast Georgia and is part of the Athens-Clarke County Metropolitan Statistical Area. As of June 2012, employment conditions improved as the rate of job growth increased and the unemployment rate decreased from the previous year. Employment increased in the majority of the major industry sectors. The population in Clarke County has grown and SNL Financial predicts a future increase of approximately 8 percent by 2015. Poverty in 2009 neared 39 percent, almost three times the US rate of 14 percent according to the US Census Bureau. This is likely a reflection of median household incomes in Clarke County, which have decreased and are well below the nation. Consumer credit conditions are relatively stable. Real estate conditions are mixed as single family permits have increased from a year ago. The housing affordability index in Clarke County has risen amidst declining incomes, and is indicative of declining home prices.

Oconee County

Oconee County is located in northeast Georgia and is part of the Athens-Clarke County Metropolitan Statistical Area. As of June 2012, employment conditions improved as the rate of job growth increased and the unemployment rate decreased from the previous year. Employment increased in the majority of the major industry sectors. The population in Oconee County has risen over 2 percent from a 30 percent year ago and SNL Financial predicts a future increase in the county’s population of nearly 11 percent by 2015. Poverty in 2009 rose to 8 percent, but was less than the US rate of 14 percent according to the US Census Bureau. Consumer credit conditions remain relatively unchanged from a year ago while real estate conditions are mixed. Single family permits and the housing affordability index have increased from a year ago.

Gainesville MSA Assessment Area

The Gainesville GA MSA includes Hall County. Gainesville, the county seat of Hall County, is located 50 miles northeast of Atlanta and 40 miles northwest of Athens. Situated on the shores of Lake Lanier and at the foothills of the Blue Ridge Mountains, Gainesville is considered the economic center of Northeast Georgia. There are 22 census tracts within this MSA consisting of 3 moderate-, 16 middle-, and 3 upper-income geographies.

According to the 2000 US Census, the population of the Gainesville GA MSA was comprised of 139,277 residents, 47,391 households, and 36,245 families. Over 11percent of families had income considered below the poverty level. In 2006, the population of the Gainesville GA MSA increased to 173,256. The census median family income was \$50,899. The Department of Housing and Urban Development's (HUD) updated median family income estimate is \$56,500

for 2007. Owner occupied housing is high at 80 percent; while rental occupied units represent 20 percent of the total housing units in the county. Of the 51,046 existing housing units, seventy-seven consist of 1-4 family units and 7 percent consist of multi-family units. The median housing value is \$117,329. Households living below poverty level are 11 percent with unemployment at 3.8 percent. Average unemployment for the area is lower than 2000 and average wages have increased.

Please see the table below for more detail demographic information on this AA:

Demographic Information for the Gainesville AA					
	#	% Low	% Moderate	% Middle	% Upper
Geographies (Census Tracts)	22	0%	14%	72%	14%
Population by Geography	139,277	0%	14%	74%	12%
Owner-Occupied Housing by Geography	33,681	0%	5%	79%	16%
Businesses by Geography	20,613	0%	17%	68%	15%
Farms by Geography	551	0%	7%	81%	12%
Family Distribution by Income Level	36,245	19%	19%	24%	38%
Household Distribution by Income Level	47,391	15%	11%	17%	57%
Census Median Family Income (MFI)		\$50,101	Median Housing Value		\$112,773
HUD-Adjusted MFI: 2010		\$60,200	Families Below the Poverty Level		8%
HUD- Adjusted MFI: 2011		\$61,200	Unemployment Rate		8%

Source: 2000 US Census Data

Hall County

Hall County is located in northern Georgia and is a part of the Gainesville Metropolitan Statistical Area. As of June 2012, employment conditions improved as the rate of job growth increased and the unemployment rate decreased from the previous year. Employment increased in the majority of the major industry sectors. The largest job gains occurred in the financial activities and education and health services sectors, with the largest losses in the transportation and utilities and government sectors. The population in Hall County increased since last year, and SNL Financial predicts a future increase of approximately 4 percent by 2016. The median household income decreased by approximately 2 percent year-over-year and was 6 percent below the nation. As a result, the percentage of county residents in poverty increased from the previous year. Government transfer payments, such as unemployment benefits, increased from a year ago. Consumer credit conditions worsened from the previous year, as personal bankruptcy filings increased by approximately 3 percent. The July 2012 foreclosure filing rate in Hall County was approximately 18 percent higher than the statewide rate.

Community Contact

CRA evaluation procedures include contacting area leaders to discuss the needs and development of the community, as well as the involvement of local financial institutions. Individuals interviewed provide information based upon their knowledge and expertise in the housing and/or

economic sectors. A community contact was conducted during the evaluation. The contact indicated that while the availability of credit is increasing and the public perception of the local area banks is that they do try to meet the credit needs of the community and reach out to all members of the area.

Conclusions with Respect to Performance Tests

Lending Test

NBG’s performance under the lending test is satisfactory. However, NBG was found to have poor penetration among borrowers of different income levels and businesses of different sizes. Overall, NBG’s geographical distribution of loans was excellent. More emphasis was given to bank’s performance in the Athens GA MSA assessment area since there was more lending activity in that geography as compared to the Gainesville GA MSA during the evaluation period.

All criteria of the lending test are documented below:

Loan-to-Deposit Ratio

NBG's average loan-to-deposit ratio is reasonable compared to its competition. The bank’s average loan-to-deposit ratio for the 18 quarters since the last CRA examination is 104.57 percent. During this period, the bank’s average loan-to-deposit ratio ranged from a low of 94.27 percent and a high of 120.54 percent.

The bank’s net loan-to-deposit ratio compares favorably with other financial institutions of similar size, location and product offerings. NBG ranks third among a total of six similarly situated banks. The average net loan-to-deposit ratios for the other five banks over the same 18 quarters ranged from 69.72 percent to 126.95 percent.

Lending in Assessment Area

A majority of NBG’s primary loan products were made within the bank's assessment areas. Seventy-four percent of the loans originated in these primary loan products were made within the bank’s AAs. The following table details the bank’s lending within the AA by number and dollar amount of loans.

Lending in Athens and Gainesville MSA AAs										
Loan Type	Number of Loans					Dollars of Loans ('000)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	141	77.9	40	22.1	181	26,716	81.0	6,258	19.0	32,974
Home Refinance	364	72.4	139	27.6	503	84,583	67.4	40,839	32.6	125,422
Business	34	85.0	6	15.0	40	3,294	70.4	1,383	29.6	4,677
Totals	539	74.4	185	25.6	724	114,593	70.3	48,480	29.3	163,073

Source: HMDA data and sampled business loan data 2010-2011

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Overall, the distribution of loans reflects a needs to improve penetration among individuals of different income levels and businesses of different sizes in the Athens AA and Gainesville AA. The analyses revealed the bank’s lending activity is substantially lower in Gainesville AA; therefore, more emphasis was put on the bank’s lending performance in the Athens AA.

Performance in the Athens AA

The borrower distribution of loans in the Athens AA is poor given the bank’s performance context. In particular, loans to individuals of different income levels are poor, while loans to businesses of different sizes are excellent.

Home Loans

The distribution of home loans to borrowers reflects a poor penetration among borrowers of different income levels. Home loans for low- and moderate-income families are poor even when considering 12 percent of families live below the poverty level and the affects of a sluggish economy. Home purchase loans to low-income families at 1 percent is significantly lower than the 22 percent of low-income families in the AA, while home purchase loans for moderate-income families at 8 percent are also significantly below the demographic family population of 17 percent. Home refinance loans for moderate- income families at 17 percent equal the percentage of moderate- income families in the AA. There were no loans granted to low-income borrowers for home refinancing in the AA.

The following table shows the distribution of home loan products among borrowers of different income levels for the period of January 1, 2010 through December 31, 2011 as compared to the percent of families in each income category.

Borrower Distribution of Residential Real Estate Loans in Athens AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	21.8	1.4	16.5	7.91	18.8	7.2	42.7	55.4
Home Refinance	21.8	0.0	16.5	16.7	18.8	16.7	42.7	25.0

Source: HMDA data for 2010-2011 and HUD-updated 2000 US Census data

Business Loans

The distribution of loans to businesses reflects an excellent penetration among businesses of different sizes. Ninety percent of the bank’s loans to businesses originated and purchased during the loan sampling period were made to small businesses. Small businesses are businesses with gross annual revenues of one million dollars or less. This is considered more than reasonable when compared to demographic data that show 65.7 percent of the area’s businesses are

considered small businesses. The following table shows the distribution of commercial loans among different sized businesses in the Athens AA.

Borrower Distribution of Loans to Businesses in Athens AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	65.7%	2.2%	32.1%	100%
% of Bank Loans in AA by #	90.0%	10.0%	0.0%	100%
% of Bank Loans in AA by \$	97.6%	2.4%	0.0%	100%

Source: Loan sample; Dunn and Bradstreet data.

Performance in the Gainesville AA

Overall, the borrower distribution of loans in the Gainesville AA is poor. However, less weight was given to this performance in view of the volume and number of loans granted in the Athens MSA relative to this AA.

Home Loans

The distribution of home loans to borrowers reflects poor penetration among borrowers of different income levels even when taking into account the AA’s poverty rate of eight percent and the unfavorable effect this has on opportunities to make loans to low- and moderate- income borrowers.

There were no home purchase and refinance loans to low-income families during this evaluation period. There were no home refinance loans to moderate- income families. Home purchase loans for moderate- income families at 14 percent were somewhat lower than the 18 percent of moderate- income families in the AA. The economic challenges during this evaluation period have stressed the housing market and resulted in enhanced mortgage lending underwriting making home purchase and refinance loans more difficult for borrowers to qualify.

The following table shows the distribution of home loan products among borrowers of different income levels for the period of January 1, 2010 through December 31, 2011 as compared to the percent of families in each income category.

Borrower Distribution of Residential Real Estate Loans in the Gainesville AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	18.6	0.00	18.7	13.6	24.3	72.8	38.3	13.6
Home Refinance	18.6	0.00	18.7	0.00	24.3	0.00	38.3	0.00

Source: HMDA data for 2010-2011 and HUD-updated 2000 US Census data

Business Loans

The distribution of loans to businesses reflects an excellent penetration among businesses of different sizes. One hundred percent of the bank’s sampled loans to businesses originated during the evaluation period. Small businesses are businesses with gross annual revenues of one million dollars or less. The bank’s performance is excellent when compared to demographic data that show 70.7 percent of the area’s businesses are small businesses. The following table shows the distribution of commercial loans in the Athens AA:

Borrower Distribution of Loans to Businesses in the Gainesville AA				
Businesses Revenues	< or = \$1 million	> \$1 million	Unavailable	Total
% of AA Businesses	70.7%	2.6%	26.7%	100%
% of Bank Loans in AA by #	100.0%	0.0%	0.0%	100%
% of Bank Loans in AA by \$	100.0%	0.0%	0.0%	100%

Source: Loan sample; Dunn and Bradstreet data.

Geographic Distribution of Loans

Overall, the distribution of loans reflects an excellent dispersion throughout the bank’s AAs. There were no conspicuous lending gaps identified within NBG’s AAs.

Performance in the Athens AA

The bank’s geographic distribution of loans in this AA reflects an excellent dispersion throughout census tracts of different income levels.

Home Loans

The geographic distribution of residential loans reflects an excellent dispersion throughout the AA. The percent of home purchase loans at 10 percent exceeds the percent of owner-occupied housing units in low- income census tracts. Home refinances at 25 percent exceed the percent of owner-occupied housing units 4 percent in low-income census tracts. Home purchases in moderate income census tracts at 18 percent equals the housing demographics of 18 percent. The percent of home refinancing at 8 percent in moderate census tracts is significantly lower than the percent of owner-occupied housing units in these census tracts.

The following is a table that details the bank’s performance as compared to the percentage of owner-occupied housing units in each census tract income level.

Geographic Distribution of Residential Real Estate Loans in Athens AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	3.9	10.1	18.2	17.9	16.4	12.9	61.3	58.9
Home Refinance	3.9	25.0	18.2	8.3	16.4	0.0	61.3	66.7

Business Loans

The overall geographic distribution of small loans to business in the Athens MSA is excellent. The bank’s percent of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in these geographies. The bank’s percent of small loans to businesses in moderate-income geographies significantly exceeds the percent of businesses in these geographies.

Following is a table that details the bank’s performance as compared to the percentage of businesses in each census tract income level.

Geographic Distribution of Loans to Businesses in Athens AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses/Farms	% of Number of Loans	% of AA Businesses/Farms	% of Number of Loans	% of AA Businesses/Farms	% of Number of Loans	% of AA Businesses/Farms	% of Number of Loans
Business	28.4	16.7	14.1	33.3	15.5	22.2	42.1	27.8

Source: Loan sample; Dunn and Bradstreet data.

Performance in the Gainesville AA

The geographic distribution of loans in the Gainesville AA is reasonable. There are no low-income census tracts located in this AA. However, less weight was given to this performance in view of the volume and number of loans granted in the Athens MSA relative to this AA. The bank’s lending activity in this AA was nominal.

Home Loans

The geographic distribution of home loans reflects excellent dispersion among census tracts of different income levels. Lending in the moderate-income census tracts significantly exceeded demographic comparators for home purchase loans. There were no home refinance loans extended in moderate-income census tracts in comparison to the 5.2 percent of OOH in these census tracts.

The following table shows the distribution of home loan products among census tracts of different income levels.

Geographic Distribution of Residential Real Estate Loans in Gainesville AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	N/A	0.00	5.2	13.6	78.9	72.8	15.8	13.6
Home Refinance	N/A	0.00	5.2	0.00	78.9	0.00	15.8	0.0

Source: HMDA data for 2010-2011 and 2000 US Census data. N/A- non-applicable.

Business Loans

The geographical distribution of loans to businesses reflects reasonable dispersion among census tracts of different income levels. The bank’s percent of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in these geographies. The following table shows the distribution of commercial loans among different size businesses in the AA, based on our sample.

Geographical Distribution of Business Loans in the Gainesville AA								
Census Tract income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of loans
Business	N/A	0.00	17.1	14.3	67.8	71.4	15.1	14.3

Source: Loan sample; Dunn and Bradstreet data.

COMMUNITY DEVELOPMENT TEST

The Community Development Test is rated Satisfactory. During the evaluation period, NBG provided over \$ 7 million in community development loans and CRA qualified investments to help meet the community development (CD) needs of its AAs. In addition, bank personnel provided financial expertise to ten community development organizations serving the AAs. The bank’s level of CD activities is considered adequate given its size and capacity, considering the CD needs and opportunities of its AAs.

Performance in the Athens AA

NBG has demonstrated adequate responsiveness to the community development needs of this AA, considering its performance context and the needs and opportunities within the AA.

Performance in the Gainesville AA

NBG has demonstrated adequate responsiveness to the community development needs of this AA, considering its performance context and the needs and opportunities within the AA.

Number and Amount of Community Development Loans

NBG has provided an adequate level of community development loans within its AAs.

Performance in the Athens AA

NBG originated 38 community development loans in this AA since the last CRA examination totaling \$5,798,780. This lending activity primarily consisted of loans that provided affordable housing in the AA. The bank made loans to builders to finance the construction of single-family homes and multi-family apartments. Most of these projects were done in conjunction with affordable housing programs through state, municipal and community organizations.

Performance in the Gainesville AA

NBG made five community development loans totaling \$929,005 during the evaluation period. Two of these loans supported new business development and economic revitalization in a moderate income geography and the other three loans provided for affordable housing in the AA.

Number and Amount of Qualified Investments

NBG has provided an adequate level of qualified investments throughout its AA.

Performance in the Athens

NBG made 24 qualified investments totaling \$21,600 to organizations that provide community services to low- and moderate-income individuals in this AA since the last examination. These investments primarily consisted of donations made to community development organizations that provided services targeted to low- or moderate-income persons in the AA to include homeless shelters, youth programs, and skills training programs.

In addition, NBG has an outstanding investment of \$307,500 for low-income Housing Tax Credits that provide for the development of low- and moderate-income housing in the AA.

Performance in the Gainesville AA

NBG made 7 qualified investments totaling \$3,125 to organizations that provide community services to low- and moderate-income individuals in this AA since the last examination. These investments primarily consisted of donations made to community development organizations that provided services targeted to low- or moderate-income persons in the AA to include youth programs and skills training programs.

Extent to Which the Bank Provides Community Development Services

NBG has provided an adequate level of community development services throughout its AAs.

Performance in the Athens AA

The types of services available at NBG are responsive to the needs of low- and moderate-income persons in the community. Banking services include a free checking account that has no monthly service charge, no minimum balance required and no per check charges. The bank's branch network also provides availability to low- and moderate-income persons in the community. All of the bank's locations are full service facilities with ATM and drive-through facilities.

Bank personnel have also engaged in community development services that are responsive to community needs. These activities were primarily teaching low- or moderate-income individuals about banking and financial management skills. NBG's officers provided technical assistance in the form of financial expertise to seven different qualifying organizations during the evaluation period.

Performance in the Gainesville AA

As noted above, NBG provides products and services that generally increase access to financial services for low- and moderate- income individuals, including low-cost bank accounts. The provision of these services received favorable consideration during this examination. NBG's officers provided technical assistance in the form of financial expertise to three different qualifying organizations during the evaluation period.

Responsiveness to Community Development Needs

Performance in the Athens AA

NBG's community development activities, as a whole, demonstrate adequate responsiveness to the needs and opportunities in this AA. Identified needs include more affordable housing and for low- and moderate-income individuals. The bank did provide \$21,600 in donations to organizations that provide community services to low- and moderate-income individuals; and its officers provided financial expertise to seven different qualified organizations that provide needed community services to the low- and moderate-income population in this AA.

Performance in the Gainesville AA

NBG's CD loans, qualified investments, and CD services demonstrate adequate responsiveness to the needs and opportunities in this AA. CD opportunities are available to help finance affordable housing, and to a lesser extent for revitalizing and stabilizing low- and moderate-income geographies.

The majority of qualified investments helped provide community services to low- and moderate-income individuals and NBG's officers provided financial expertise to three different qualifying organizations during this evaluation period.

Responses to Complaints

NBG has not received any CRA complaints during this evaluation period.

Fair Lending or Other Illegal Credit Practices Review

This evaluation revealed no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.