



Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

January 8, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Queensborough National Bank & Trust Company
Charter Number 6207

113 East Broad Street
Louisville, GA 30434

Office of the Comptroller of the Currency

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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.

Table of Contents

OVERALL CRA RATING	1
DEFINITIONS AND COMMON ABBREVIATIONS	2
DESCRIPTION OF INSTITUTION	6
SCOPE OF THE EVALUATION.....	8
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	9
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	10
LENDING TEST	10
INVESTMENT TEST.....	18
SERVICE TEST	19
APPENDIX A: SCOPE OF EXAMINATION.....	21
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated “**Outstanding**”.

The following table indicates the performance level of **Queensborough National Bank & Trust Company** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) 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.

The major factors that support this rating include:

- The bank originates a substantial majority of loans within its assessment areas (AAs).
- Lending activity reflects excellent responsiveness to credit needs.
- The overall geographic distribution of home mortgages and small business and farm loans is excellent.
- The distribution of home mortgages among borrowers of different income levels is good. The distribution of small business and farm loans is excellent.
- Community development lending is good and has a positive impact on the bank’s performance under the Lending Test.
- There is a significant level of qualified community development investments and grants considering the assessment areas, performance context, and available opportunities.
- Service delivery systems, including bank branches, are readily accessible to geographies and individuals of different income levels within the bank’s AAs.
- The bank provides a relatively high level of community development services.

Definitions and Common Abbreviations

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

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

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

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

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

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

Activities that revitalize or stabilize-

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income 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 Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

Queensborough National Bank & Trust Company (QNBT), established in 1902, is an intrastate bank headquartered in Louisville, Georgia. QNBT is a wholly-owned subsidiary of The Queensborough Company (TQC), a one-bank holding company. As of September 30, 2017, QNBT reported total assets of \$1.03 billion, total liabilities of \$927 million, and total equity capital of \$100 million. The loan portfolio, net of the allowance for loan and lease losses, totaled \$677 million and represented 66 percent of total assets. Loan portfolio composition as of September 30, 2017 includes the following:

	\$ Volume	% of Portfolio
Commercial Real Estate	\$226,174	32.86
Commercial Loans (non-RE)	\$56,981	8.28
Residential Mortgages (including HELOCs)	\$146,928	21.35
Farmland	\$121,649	17.67
Agricultural Production (non-RE)	\$33,457	4.86
Other (Remaining Types)	\$103,128	14.98
Total	\$688,317	100.00%

The bank originates a large volume of residential mortgages, the majority of which are sold on the secondary market. Throughout our evaluation period, the bank sold approximately 80 percent of reportable home mortgages to other banks and financial institutions.

The bank's primary focus is within the Augusta area and rural areas in surrounding non-MSA counties between the Augusta and Savannah markets. As noted below, the bank has recently increased its presence in the Savannah area; however, lending and deposit volumes are minimal given strong competition. Growth initiatives stem from the improving Augusta and Savannah markets; however, the bank will continue to serve the needs of the non-MSA areas where QNBT ranks second in deposit market share. Lending focus within Augusta and Savannah is concentrated within residential mortgages and commercial lending. For the non-MSA counties, the lending focus is within the three primary lines of residential mortgages, commercial lending, and agricultural lending.

QNBT offers a variety of traditional banking products for consumers and businesses, including free checking accounts. Lending products include standard consumer loans and mortgages (ARMs and short-term fixed rates), commercial real estate and operating loans, and agricultural loans. Longer-term, including conventional, FHA, VA, USDA, and Georgia Dream, mortgages are available through the bank's mortgage department. SBA guaranteed loans are also available for qualifying commercial loans. Additionally, the bank has a wealth management division offering private banking, trust and estate services, and retirement services.

The bank has designated three AAs – the East Georgia Non-MSA AA (East Georgia AA), the Augusta-Richmond County, GA-SC MSA (Augusta AA), and the Savannah, GA MSA (Savannah AA) – consisting of whole counties. The bank serves these AAs through 24 branch locations and 23 ATMs. The East Georgia AA is made up of 7 contiguous counties (Bulloch, Candler, Emanuel, Jefferson, Jenkins, Screven, and Washington), where 11 branches and 10 ATMs are located. Five branches are located within moderate-income census tracts (CTs), and the remaining six are located in distressed or underserved

middle-income CTs. Two of the five moderate-income CTs with a branch are designated as distressed or underserved. The Augusta AA is made up of 4 contiguous counties (Burke, Columbia, McDuffle, and Richmond), where 10 branches and 9 ATMs are located. Three branches are located within moderate-income CTs, and the remaining seven are located in middle- and upper-income CTs. The Savannah AA is made up of two contiguous counties (Chatham and Effingham), where three branches and four ATMs are located. The branches are evenly disbursed among moderate-, middle-, and upper-income CTs. The bank also has one loan production office (LPO), with an ATM, located within the Savannah AA.

QNBT purchased two branches in Savannah, GA, including certain loans and deposits, from CertusBank in October 2015. The bank also purchased all deposit accounts from an Atlantic Coast Bank branch located near an existing QNBT Savannah branch in April 2016. This consolidation activity increased the bank's presence in Savannah to three branch locations. No branches were closed within the evaluation period.

A review of the bank's CRA Public File and OCC consumer complaint records did not identify any complaints related to the bank's CRA performance since the previous evaluation.

There are no known legal, financial, or other impediments affecting the bank's ability to help meet the credit needs of its AAs. QNBT received an "Outstanding" rating at the last CRA evaluation dated January 20, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under HMDA and small loans to businesses and farms reported under the CRA, for the period of January 1, 2015 to December 31, 2016. Multifamily loans are not a primary loan product; therefore, we did not evaluate this product separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation. The evaluation period for CD loans, the Investment Test, and the Service Test was from January 21, 2015 through January 8, 2018.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data. Our testing indicated no substantive inaccuracies in the data reviewed. Therefore, we concluded that the home mortgage loans and small loans to businesses and farms data could be relied upon for this CRA examination. We also reviewed the bank's community development activities provided for consideration in our evaluation. This included testing of CD loans, investments, and services for accuracy and to determine if they qualify as community development as defined in the CRA regulation. Those not tested during the data integrity review were evaluated during the CRA examination.

Selection of Areas for Full-Scope Review

We selected the East Georgia AA and Augusta AA for full-scope reviews given that the majority of the bank's branches and lending and deposit activity were within these areas over the evaluation period. The Savannah AA was selected for a limited-scope review as lending volume and deposit activity were nominal.

Refer to Appendix A: Scope of Examination for additional information.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. We weighted both full-scope AAs equally within our analysis and overall conclusion. This equal weighting is based upon the bank having nearly even branch presence and deposit holdings in both areas. The majority (73 percent by dollar volume and 63 percent by number volume) of reportable loans within all AAs were from the Augusta AA; however, there is greater loan demand, especially for housing, within the nearby Augusta area versus the rural markets. QNBT's main office is located within the East Georgia AA, thus the bank has primary responsibility for meeting the credit needs of those communities.

When evaluating the performance under the lending test, we weighted the distribution and performance of home mortgages and small loans to businesses and farms equally. The equal weighting was based on the bank's lending strategies and community credit needs. As of December 31, 2016, the bank's loan portfolio was concentrated among commercial real estate loans and commercial (non-real estate) loans at 42 percent, farmland loans and agricultural production loans at 22 percent, and 1-4 family mortgages at 18 percent. During the evaluation period, home mortgage origination levels were higher compared to those of small loans to business and farms, but mortgage loans are sold to the secondary market. Within

the home mortgage loan category, primary consideration was given to home purchase loans as these loan types accounted for 63 percent and 59 percent of the mortgage lending activity within the Augusta AA and East Georgia AA, respectively.

Other

To assist us in understanding the credit needs within the two full-scope AAs, we reviewed a recently completed community contact for the Augusta AA and contacted a local development authority within the East Georgia AA. Refer to Appendix B below for details of these contacts.

Fair Lending or Other Illegal Credit Practices Review

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Augusta AA is good. In the East Georgia AA, the bank's performance is excellent. CD lending is good and had a positive impact on the bank's overall lending results.

Lending Activity

Refer to Appendix C: Table 1 Lending Volume for the facts and data used to evaluate the bank's lending activity.

Overall, lending activity is excellent. Equal weight was given to each AA based on the bank's lending and deposit activity within the evaluation period.

Augusta AA

Lending activity is excellent in the Augusta AA, considering the competition for reportable home mortgage loans and small loans to businesses and farms. During the evaluation period, the bank originated or purchased 1,199 home mortgages totaling \$218 million, 602 small loans to businesses totaling \$74 million, 108 small loans to farms totaling \$13 million, and 3 CD loans totaling \$558 thousand. Aggregate lending activity for this AA totaled \$304 million (exclusive of CD loans) and represented 73 percent of all reportable loans originated within the bank's AAs through 2015 and 2016. Given the mortgage office located in the Augusta AA, the bank originated a large volume of home mortgages, most of which were sold on the secondary market. Among home mortgage loan originations/purchases, approximately 79 percent was for home purchase, 4 percent was for home refinance loans, and 16 percent was for home improvement loans by number of loans originated within the AA.

The bank faces significant competition for home mortgages and small business lending within the Augusta AA. Although the bank's lending market share for these loan types (by number of loans originated) is less than its deposit market share, lending activity reflects excellent responsiveness to AA credit needs.

Deposit activity totaled \$384 million, or 47 percent of total bank deposits as of June 30, 2016, which is well below the level of lending for this AA. Market share information for deposits indicates that QNBT operates in a highly competitive banking environment with larger, nationwide financial institutions. The bank held a deposit market share of 7 percent and ranked 6th among the 17 financial institutions operating within the market. The three large banks (Wells Fargo, SunTrust, and Bank of America) ranked ahead of QNBT dominate the market with a combined market share of 44 percent. Market shares for all banks ranged from 0.09 percent to 25 percent.

According to 2015 Peer Mortgage Data, QNBT achieved a 4.55 percent market share by number of home mortgage loans and ranked 4th among 287 reporting lenders. This ranking is equivalent to being in

the top 13.94 percent of all lenders. The top three largest lenders were Wells Fargo Bank, NA, Georgia Bank and Trust of Augusta, and U.S. Bank, NA, with a combined market share of 27.84 percent.

Based on 2016 Peer Business Data, QNBT achieved a 5.02 percent market share by number of small business loans and ranked 8th among 197 reporting lenders. This ranking is equivalent to being in the top 4.06 percent of all lenders. The top three largest lenders were American Express, FSB (credit card bank), Citibank, NA, and Georgia Bank and Trust of Augusta with a combined market share of 39.48 percent. By dollar volume, QNBT holds market share of 13.30 percent, ranking 2nd behind Georgia Bank and Trust of Augusta. The bank achieved a 49.14 percent market share by number of small farm loans and ranked 1st among 14 reporting lenders. This ranking is equivalent to being in the top 7.14 percent of all lenders.

East Georgia AA

Lending activity is excellent in the East Georgia AA, considering the lending opportunities afforded to the bank due to competition and the performance context of the AA. During the evaluation period, the bank originated or purchased 282 home mortgages totaling \$29 million, 322 small loans to businesses totaling \$24 million, 368 small loans to farms totaling \$34 million, and 2 CD loans totaling \$9.18 million. Aggregate lending data for this AA totaled \$88 million (exclusive of CD loans) and represented 21 percent of all reportable loans originated within the bank's AAs through 2015 and 2016. Lending types are well diversified within these rural areas as the bank serves to meet the various needs of communities in which it operates. Among home mortgage loan originations/purchases, approximately 59 percent was for home purchase, 23 percent was for home refinance, and 17 percent was for home improvement loans by number of loans originated within the AA.

Although lending activity with respect to mortgage and small business lending is below deposit market share, the bank provides excellent responsiveness to AA credit needs. Additional support is granted to the bank's excellent responsiveness with regards to small farm lending in the East Georgia AA.

Deposit activity totaled \$355 million, or 43 percent of total bank deposits as of June 30, 2016, which is somewhat above the level of lending for this AA. Market share information for deposits indicates that QNBT operates in a moderately competitive banking environment, primarily with similar and smaller, local financial institutions and some larger ones as well. The bank held a deposit market share of 14 percent and ranked 2nd among the 17 financial institutions operating within this market. The next highest market share belonged to Synovus Bank at 16 percent. Market shares for all banks ranged from 0.52 percent to 16 percent.

According to 2015 Peer Mortgage Data, QNBT achieved a 6.72 percent market share by number of home mortgage loans and ranked 2nd among 197 reporting lenders. This ranking is equivalent to being in the top 1.01 percent of all lenders. The bank trailed Wells Fargo Bank, NA, which had a market share of 8.89 percent.

Based on 2016 Peer Business Data, QNBT achieved a 7.52 percent market share by number of small business loans and ranked 3rd among 61 reporting lenders. This ranking is equivalent to being in the top 4.91 percent of all lenders. The top two largest lenders were American Express, FSB (credit card bank) and Synovus Bank with a combined market share of 28.51 percent. By dollar volume, QNBT holds market share of 11.20 percent, ranking 2nd behind Synovus Bank. The bank achieved a 47.59 percent market share by number of small farm loans and ranked 1st among 18 reporting lenders. This ranking is equivalent to being in the top 5.56 percent of all lenders.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending activity reflects excellent distribution throughout the AAs. A good distribution of home mortgage performance was augmented by an excellent distribution of small loans to businesses and small loans to farms. We placed equal weight on each of the two full-scope AAs and concentrated more on the moderate-income geographies as the percentage of owner occupied housing units and small businesses and farms within the low-income geographies was nominal. Additionally, equal consideration was given to home mortgage loans, small loans to businesses, and small loans to farms.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans is good, with primary support being given to home purchase loans within the Augusta and East Georgia AAs.

The number of multifamily loans (Table 5) originated in the Augusta and East Georgia AAs were insignificant and a geographical analysis was not meaningful.

Augusta AA

Overall, the geographic distribution of home mortgage loans in the Augusta AA is adequate. In evaluating the geographic distribution of home mortgage loans within this AA, it is important to note that home purchase loans represented 79 percent of total home mortgage originations, followed by home improvement loans at 16 percent. Additionally, low-income census tracts represent only four percent of all geographies within the AA. As a result, we gave primary consideration to the bank's performance in the moderate-income census tracts for home purchase loans.

The overall geographic distribution of home purchase loans is adequate. The percentage of loans in low-income geographies is near the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is significantly below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies exceeds its overall market share. The bank's market share in moderate-income geographies exceeds its overall market share.

The overall geographic distribution of home improvement loans is excellent. The bank did not originate any home improvement loans within low-income geographies. The percentage of loans in moderate-income geographies significantly exceeds the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

The overall geographic distribution of home refinance loans is good. The bank did not originate any home refinance loans within low-income geographies. The percentage of loans in moderate-income geographies is near the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

East Georgia AA

Overall, the geographic distribution of home mortgage loans in the East Georgia AA is good. In evaluating the geographic distribution of home mortgage loans within this AA, it is important to note that home purchase loans represented 59 percent of total home mortgage originations, followed by home refinance loans at 23 percent and home improvement loans at 17 percent. Additionally, low-income census tracts represent less than one percent of all geographies within the AA. As a result, we gave primary consideration to the bank's performance in the moderate-income census tracts for home purchase loans.

The overall geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies is near the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies exceeds its overall market share. The bank's market share in moderate-income geographies exceeds its overall market share.

The overall geographic distribution of home improvement loans is excellent. The bank did not originate any home improvement loans within low-income geographies. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

The overall geographic distribution of home refinance loans is excellent. The bank did not originate any home improvement loans within low-income geographies. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall, the geographic distribution of small loans to businesses is excellent based upon excellent distribution of lending in both AAs.

Augusta AA

The overall geographic distribution of small loans to businesses is excellent. We placed more weight on performance in moderate-income geographies given that less than eight percent of businesses are located in low-income geographies. The percentage of small loans to businesses in low-income geographies is near the percentage of businesses in these geographies. The bank's market share in low-income geographies is near its overall market share. The percentage of loans in moderate-income geographies exceeds the percentage of businesses in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

East Georgia AA

The overall geographic distribution of small loans to businesses is excellent. We placed more weight on performance in moderate-income geographies given that less than four percent of businesses are located in low-income geographies. The percentage of small loans to businesses in low-income geographies is near the percentage of businesses in these geographies. The bank's market share in low-income

geographies is significantly below its overall market share. The percentage of loans in moderate-income geographies exceeds the percentage of businesses in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Overall, the geographic distribution of small loans to farms is excellent based upon excellent distribution of lending in both AAs.

Augusta AA

The overall geographic distribution of small loans to farms is excellent. We placed more weight on performance in moderate-income geographies given that less than five percent of farms are located in low-income geographies. The bank did not originate any small loans to farms located within low-income geographies. The percentage of small loans to farms in moderate-income geographies exceeds the percentage of farms in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

East Georgia AA

The overall geographic distribution of small loans to farms is excellent. No farms were located within low-income geographies. The percentage of small loans to farms in moderate-income geographies exceeds the percentage of farms in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed QNBT's home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. Further, all of the bank's AAs consist of whole geographies, meet the requirements of CRA, and do not arbitrarily exclude any low- or moderate-income areas.

Inside/Outside Ratio

This ratio is a bank-wide calculation, and not calculated by individual rating area or AA. The analysis is limited to bank originations and purchases only. For the combined two-year evaluation period, QNBT originated a substantial majority of all loan products inside the bank's AAs (88 percent). The percentage in number of loans made inside the AAs by loan type is as follows: home purchase loans (87 percent), home improvement loans (87 percent), home refinance loans (85 percent), small loans to businesses (90 percent), and small loans to farms (90 percent). This performance had a positive effect on the bank's overall geographic distribution analysis.

Distribution of Loans by Income Level of the Borrower

Overall, the borrower distribution of the bank's lending activity reflects good distribution throughout the AAs. The overall distribution of home mortgage loans to borrowers of different income levels and small loans to businesses of different sizes is good, while the overall distribution of small loans to farms of

different sizes is excellent. We placed equal weight on each of the two full-scope AAs for all three types of lending activity.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Overall, the borrower distribution of home mortgage loans is good, with primary support being given to home purchase loans within the Augusta and East Georgia AAs.

Augusta AA

Overall, the borrower distribution of home mortgage loans in the Augusta AA is good. In evaluating the borrower distribution of home mortgage loans within this AA, it is important to note that home purchase loans represented 79 percent of total home mortgage originations, followed by home improvement loans at 16 percent. Further, 2010 U.S. Census data reflects sixteen (16) percent of households in the AA are below the poverty level. This percentage is slightly above the fifteen (15) percent poverty level for the state of Georgia, thus making it more difficult to originate home mortgages to low-income borrowers.

The overall 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. The percentage of loans to moderate-income borrowers is near the percentage of moderate-income families. The bank's market share of loans to low-income borrowers is below its overall market share. The bank's market share of loans to moderate-income borrowers is near its overall market share.

The overall borrower distribution of home improvement 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. The bank's market share of loans to low-income borrowers is below its overall market share. The bank's market share of loans to moderate-income borrowers is near its overall market share.

The overall borrower distribution of home refinance loans is adequate. 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 is below the percentage of moderate-income families. The bank's market share of loans to low-income borrowers is below its overall market share. The bank's market share of loans to moderate-income borrowers is near its overall market share.

East Georgia AA

Overall, the borrower distribution of home mortgage loans in the East Georgia AA is good. In evaluating the borrower distribution of home mortgage loans within this AA, it is important to note that home purchase loans represented 59 percent of total home mortgage originations, followed by home refinance loans at 23 percent and home improvement loans at 17 percent. Further, 2010 U.S. Census data reflects twenty-five (25) percent of households in the AA are below the poverty level. This percentage is above the fifteen (15) percent poverty level for the state of Georgia, thus making it more difficult to originate home mortgages to low-income borrowers.

The overall 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. The percentage of loans to moderate-income borrowers is near the percentage of moderate-income families. The bank's market share of loans to low-income borrowers is significantly below its overall market share. The bank's market share of loans to moderate-income borrowers exceeds its overall market share.

The overall borrower distribution of home improvement 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. The bank's market share of loans to low-income borrowers is near its overall market share. The bank's market share of loans to moderate-income borrowers is exceeds its overall market share.

The overall borrower distribution of home refinance loans is good. 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 is below the percentage of moderate-income families. The bank's market share of loans to low-income borrowers exceeds its overall market share. The bank's market share of loans to moderate-income borrowers exceeds its overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Overall, the borrower distribution of small loans to business is good, with equal weighting being given to small loans to businesses within the Augusta and East Georgia AAs.

Augusta AA

The overall borrower distribution of small loans to businesses is good. The percentage of small loans to businesses (businesses with annual gross revenues of \$1 million or less) is below the percentage of small businesses. The majority of the bank's loans to businesses were for amounts less than \$100 thousand. A good portion of the remaining loans were for amounts between \$100 thousand and \$250 thousand. The bank's adequate performance is enhanced by its excellent market share. The bank's market share of small loans to businesses exceeds its overall market share.

East Georgia AA

The overall borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses (businesses with annual gross revenues of \$1 million or less) is near the percentage of small businesses. The vast majority of the bank's loans to businesses were for amounts less than \$100 thousand. The bank's good to excellent performance is enhanced by its excellent market share. The bank's market share of small loans to businesses exceeds its overall market share.

Small Loans to Farms

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Overall, the borrower distribution of small loans to farms is good, with primary support being given to small loans to businesses within the East Georgia AA. A significant majority of the bank's small loans to farms were originated within the East Georgia AA.

Augusta AA

The overall borrower distribution of small loans to farms is poor. The percentage of small loans to farms (farms with annual gross revenues of \$1 million or less) is significantly below the percentage of small farms. The majority of the bank's loans to farms were for amounts less than \$100 thousand. A reasonable portion of the remaining loans to farms were for amounts between \$100 thousand and \$250 thousand. The bank's market share of small loans to farms is near its overall market share.

East Georgia AA

The overall borrower distribution of small loans to farms is excellent. The percentage of small loans to farms (farms with annual gross revenues of \$1 million or less) is near to the percentage of small farms. The vast majority of the bank's small loans to farms are to farms with revenues of \$1 million or less. The majority of the bank's loans to farms were for amounts less than \$100 thousand. A good portion of the remaining loans to farms were for amounts between \$100 thousand and \$250 thousand. The bank's good performance is enhanced by its excellent market share. The bank's market share of small loans to farms exceeds its overall market share.

Community Development Lending

Overall, QNBT's level of CD lending is good and is considered to have a positive impact on the Lending Test rating.

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Augusta AA

The bank's level of CD lending in the Augusta AA had a neutral impact on the bank's lending performance. QNBT originated an adequate level of CD loans within this AA. The bank originated two loans totaling \$408 thousand for the purpose of purchasing multifamily rental properties serving LMI persons. The bank also granted a line of credit totaling \$150 thousand to a local food bank that services LMI individuals. These loans represented 0.51 percent of tier one capital and the allowance as of September 30, 2017.

East Georgia AA

The bank's level of CD lending in the East Georgia AA had a positive impact on the bank's lending performance. QNBT is a leader in making CD loans within this AA. The bank originated two loans totaling \$9.18 million for the purpose of revitalizing and stabilizing LMI geographies. An example included one large loan for the purpose of acquiring and renovating a decommissioned water treatment plant for use by the city of Louisville and a new chicken processing plant. The poultry company will provide for approximately 115 new jobs to the area and the city will use a portion of the water treatment plant for all domestic sewage treatment. All CD loans within the AA represented 8.46 percent of tier one capital and the allowance as of September 30, 2017.

Product Innovation and Flexibility

Overall, product innovation and flexibility had a neutral impact on the Lending Test. QNBT participates in several homeownership programs offered through Georgia Dream Homeownership Program, Augusta Housing and Community Development Department, and the USDA. Additionally, the bank participates in nationally available programs to assist small businesses and farms through the SBA and USDA, respectively. All loans originated under these programs were included in the geographic and borrower distribution analyses discussed above.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Savannah AA is less than the bank's overall "Outstanding" performance under the Lending Test. The bank's lending performance in the Savannah AA is considered good. Primary differences were noted within the geographic and borrower distribution tests, which reflected good performance. However, this difference is not significant enough to impact the bank's overall rating. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Augusta AA and East Georgia AA is good.

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

Augusta AA

During the evaluation period, QNBT made 26 investments in the AA totaling \$87 thousand. These investments consisted primarily of donations/grants to various non-profit organizations that provide community services to LMI individuals. Additionally, we considered the ongoing impact of investments made prior to the current evaluation period. Prior period investments consisted of an FNMA mortgage-backed security CRA bond with a current balance of \$739 thousand. This bond consists of mortgages to LMI geographies and LMI borrowers located in the state of Georgia. We gave some consideration to this investment as 20 percent of the mortgages (by number) are located within the Augusta AA. An additional 20 percent are located within the Savannah AA (limited-scope AA), with the remaining being located throughout the state of Georgia.

East Georgia AA

During the evaluation period, QNBT made 18 investments in the AA totaling \$37 thousand. These investments consisted primarily of donations/grants to various non-profit organizations that provide community services to LMI individuals. The bank has no outstanding prior period investments within this AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Savannah AA is consistent with the bank's overall "High Satisfactory" performance under the Investment Test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Outstanding". Based on the full-scope reviews, the bank's performance in the Augusta AA and East Georgia AA is excellent with primary consideration being given to availability of retail banking services. Secondary consideration was given to qualifying community development services provided by the bank.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Augusta AA

The geographic distribution of QNBT's branches in the Augusta AA is excellent. Branches are readily accessible to geographies and individuals of different income levels. Of the bank's ten branches in the AA, none are located in low-income geographies. However, the AA's population living in low-income geographies is limited at 6.87 percent. The percentage of the bank's branches within moderate-income geographies exceeds the percentage of population residing in those areas. The percentage of ATMs located within moderate-income geographies is below the percentage of population residing in those areas as one branch does not have an ATM. Banking hours are tailored to the convenience and needs of the service areas for all branch locations. Services offered are comparable among all branches.

During the evaluation period, the bank did not open or close any branches within the Augusta AA.

East Georgia AA

The geographic distribution of QNBT's branches in the East Georgia AA is excellent. Branches are readily accessible to geographies and individuals of different income levels. Of the bank's 11 branches in the AA, none are located in low-income geographies. However, the AA's population living in low-income geographies is limited at 8.53 percent. The percentage of the bank's branches within moderate-income geographies exceeds the percentage of population residing in those areas. All branches have an ATM, with the exception of the main branch in Louisville. The other Louisville branch is located within a few miles of the main location, thus ATM needs can be reasonably served outside of normal banking hours for this area. Further, the percentage of ATMs located within moderate-income geographies exceeds the percentage of population residing in those areas. Banking hours are tailored to the convenience and needs of the service areas for all branch locations. Services offered are comparable among all branches.

During the evaluation period, the bank did not open or close any branches within the East Georgia AA.

The bank augments its traditional service delivery methods with a variety of alternative systems including ATMs, online and mobile banking, telephone banking, and cash management services for businesses. To enhance the availability of cash outside of normal banking hours, customers are given six

free withdrawals per month from non-QNBT ATMs. All of these services are available to the entire customer base within all AAs.

Community Development Services

The bank provides a relatively high level of CD services in the Augusta and East Georgia AAs. Bank management and employees serve in various capacities (Board members, committee members, and members) with local non-profit and governmental organizations to provide technical assistance on financial matters and participate in fund raising activities. QNBT has also developed iQ University, in which two designated employees provide financial literacy education to employees of local businesses, non-profit organizations, and governmental entities.

Augusta AA

Bank employees served 11 qualifying entities within the Augusta AA through providing technical assistance on financial matters and by participating in fund raising activities. These entities primarily consisted of those that promote economic development or provide community services to LMI individuals. Financial education training sessions were conducted at 22 qualifying entities targeted towards LMI individuals.

East Georgia AA

Bank employees served 30 qualifying entities within the East Georgia AA through providing technical assistance on financial matters and by participating in fund raising activities. These entities primarily consisted of those that promote economic development or provide community services to LMI individuals. Financial education training sessions were conducted at 23 qualifying entities targeted towards LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Savannah AA is consistent with the bank's overall "Outstanding" performance under the Service Test. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2015 to 12/31/2016	
	Investment and Service Tests and CD Loans: 01/21/2015 to 01/08/2018	
Financial Institution		Products Reviewed
Queensborough National Bank and Trust Company Louisville, GA		HMDA loans; small loans to businesses and farms; and CD loans, investments, and services
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Augusta AA	Full-Scope	Burke, Columbia, McDuffie, and Richmond
East Georgia AA	Full-Scope	Bulloch, Candler, Emanuel, Jefferson, Jenkins, Screven, and Washington
Savannah AA	Limited-Scope	Chatham and Effingham

Appendix B: Market Profiles for Full-Scope Areas

Augusta-Richmond County, GA-SC MSA (Augusta AA)

Demographic Information for Full Scope Area: Augusta AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	78	10.26	30.77	32.05	26.92	0.00
Population by Geography	369,793	6.87	27.40	34.41	31.31	0.00
Owner-Occupied Housing by Geography	86,927	4.45	25.10	33.41	37.03	0.00
Business by Geography	21,025	7.30	22.15	32.64	37.92	0.00
Farms by Geography	642	4.05	29.13	33.18	33.64	0.00
Family Distribution by Income Level	90,391	23.60	16.82	18.94	40.64	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	36,532	12.16	39.09	31.54	17.20	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		54,820 58,500 16%	Median Housing Value Unemployment Rate (2016 Augusta-Richmond County MSA - BLS)		132,397 5.6%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

The Augusta-Richmond County, GA-SC Multi-State MSA consists of a seven county area located along the Georgia-South Carolina state lines. The MSA includes the counties of Burke, Columbia, Lincoln, McDuffle, and Richmond, GA and Aiken and Edgefield, SC. The 2016 estimated population is 594,919 making this area the second largest MSA in the state of Georgia. The area's population has grown by approximately 30,000 people since the 2010 census.

As of December 2017, Moody's Analytics reflects improved job growth within the MSA that bested Georgia and the U.S. for the year. Job growth is expected to continue as construction on two nuclear reactors have started back up at Plant Vogtle and the Army Cyber Command Center is being transferred to Fort Gordon. Private industries are also adding workers that extend to all wage tiers and Augusta ranks as the highest among all metro Georgia areas. According to 2016 Bureau of Labor Statistics data, unemployment within the entire Augusta-Richmond County MSA was 5.6 percent, remaining slightly above the state average at 5.4 percent and the national average at 4.9 percent.

Residential construction has been fairly stable over the past few years but is expected to increase in years 2018 to 2020 to prepare for the influx of people as the Army Cyber Command nears completion in 2020. Affordability has remained stable and above that of the state of Georgia and the U.S even though housing prices are increasing slightly.

Top employers in the Augusta-Richmond County MSA are: U.S. Army Signal Center and Fort Gordon (25,264), Westinghouse Savannah River Co. (11,068), Georgia Regents University (6,470), Augusta University (4,656), University Hospital (3,200), and Augusta University Hospitals (3,054). In addition, the public workforce consists of 9,353 federal, 16,033 state, and 21,894 local government employees.

QNBT has designated the counties within this MSA that have a branch location as part of their AA, known as the Augusta AA. These counties include Burke, Columbia, McDuffie, and Richmond, GA consisting of 78 census tracts, of which 10 percent and 31 percent are considered low- and moderate-income geographies, respectively. The estimated 2010 Census population was 369,793 with 16 percent of households living below the poverty level. The AA consists of 151,440 total housing units, with 86,927 (57.40 percent) being owner occupied versus 44,963 (29.69 percent) being rental occupied. The remaining 13 percent are vacant units. Within the low-income geographies, rental occupied units total 6,094 (plus those vacant of 2,590) compared to 3,869 owner occupied units, thus causing availability to be lower. Availability within the moderate-income geographies improves as owner occupied units represent 48.68 percent, rental occupied units represent 36.04 percent, and vacant units represent 15.27 percent.

The bank has 10 branches in this AA, all of which have an ATM except for one location. QNBT faces strong competition from other financial institutions in the AA. According to the FDIC's Deposit Market Share Report as of June 30, 2016, QNBT had \$384 million in deposits which ranked 6th out of 17 other lenders with deposit share of 6.60 percent. The top three largest financial institutions are Wells Fargo Bank, NA, Georgia Bank and Trust Company of Augusta (subsequently merged with South State Corporation), and SunTrust Bank at 24.76 percent, 24.38 percent, and 10.25 percent, respectively.

Community Contact

We reviewed information provided by a recent community contact within this AA. The economic development contact indicated affordable housing as a need that is being met through the Single-Family Housing Mortgage Program. This program serves households at 80 percent and below AMI. The contact indicated that credit is an issue and they have been working with various sources to provide hands-on basic education, technical assistance, and homebuyer counseling. Further, the contact mentioned that banks could become more involved with these programs as well as financing offered through the Central Savannah River Area Regional Commission. The contact was familiar with QNBT and noted their active participation within the Guaranteed Loan Program.

Georgia Non-MSA Counties (East Georgia AA)

Demographic Information for Full Scope Area: East Georgia AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	37	5.41	21.62	62.16	10.81	0.00
Population by Geography	164,863	8.53	21.20	52.11	18.15	0.00
Owner-Occupied Housing by Geography	37,088	0.77	21.18	57.46	20.60	0.00
Business by Geography	8,656	3.72	21.58	57.17	17.53	0.00
Farms by Geography	738	0.00	19.24	61.65	19.11	0.00
Family Distribution by Income Level	37,502	22.97	19.15	17.57	40.31	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,796	2.02	29.68	55.43	12.88	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		44,940 45,300 25%	Median Housing Value Unemployment Rate (2016 East Georgia AA Counties - BLS)		94,349 6.8%	

QNBT's main office is located in Louisville, Jefferson County, GA. Ten other branch locations are spread throughout the contiguous counties of Bulloch, Candler, Emanuel, Jefferson, Jenkins, Screven, and Washington, which make up the bank's East Georgia AA. These counties consist of 37 census tracts, of which 5 percent and 22 percent are considered low- and moderate-income geographies, respectively. The estimated 2010 Census population was 164,863 with 25 percent of households living below the poverty level. According to 2016 Bureau of Labor Statistics data, unemployment within the East Georgia AA counties was 6.8 percent, which is above the state average at 5.4 percent and the national average at 4.9 percent. The AA consists of 70,008 total housing units, with 37,088 (52.98 percent) being owner occupied versus 20,439 (29.20 percent) being rental occupied. The remaining 18 percent are vacant units. Within the low-income geographies, rental occupied units total 2,989 (plus those vacant of 835) compared to 285 owner occupied units, thus causing availability to be lower. Availability within the moderate-income geographies improves as owner occupied units represent 49.16 percent, rental occupied units represent 32.56 percent, and vacant units represent 18.28 percent.

As noted above, the bank has 10 branches in this AA, all of which have an ATM except for the main location in Louisville. QNBT faces moderate to strong competition from other financial institutions in the AA. According to the FDIC's Deposit Market Share Report as of June 30, 2016, QNBT had \$355 million in deposits which ranked 2nd out of 17 other lenders with deposit share of 14.13 percent. The other top three financial institutions are Synovus Bank and Branch Banking and Trust Company at 15.96 percent and 12.63 percent, respectively.

Community Contact

We contacted a local development authority director to ascertain community credit needs within one county of this AA. The development authority works with local financial institutions to meet community credit needs; however, there are no projects underway at this time. The director indicated that local financial institutions are responsive to credit needs of the community.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of home purchase loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - Compares the percentage distribution of the number of home improvement loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - Compares the percentage distribution of the number of home refinance loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6.** **Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 7.** **Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 8.** **Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of home purchase loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9.** **Borrower Distribution of Home Improvement Loans** - Compares the percentage distribution of the number of home improvement loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 10.** **Borrower Distribution of Refinance Loans** - Compares the percentage distribution of the number of home refinance loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 11.** **Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12.** **Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

- Table 13. Geographic and Borrower Distribution of Consumer Loans (N/A)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each AA. The table also presents data on branch openings and closings in each AA.

Table 1. Lending Volume

LENDING VOLUME			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016			
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Augusta AA	63.17	1,199	217,510	602	73,567	108	12,829	0	0	1,909	303,906	46.77
East Georgia AA	32.16	282	29,472	322	24,469	368	33,562	0	0	972	87,503	43.23
Limited Review:												
Savannah AA	4.67	51	9,683	87	14,830	3	118	0	0	141	24,631	9.99

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE				Geography: GEORGIA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% BANK Loans****	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Augusta AA	952	83.00	4.45	1.37	25.10	14.18	33.41	30.15	37.03	54.31	5.68	5.71	7.58	4.72	5.96
East Georgia AA	166	14.47	0.77	0.60	21.18	17.47	57.46	48.19	20.60	33.73	6.22	14.29	9.43	7.25	4.61
Limited Review:															
Savannah AA	29	2.53	4.70	0.00	17.53	6.90	38.37	41.38	39.39	51.72	0.09	0.00	0.16	0.08	0.09

* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: GEORGIA								Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occupied Units***	% BANK Loans****	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Augusta AA	53	41.73	4.45	0.00	25.10	49.06	33.41	33.96	37.03	16.98	5.51	0.00	11.50	5.36	2.55	
East Georgia AA	66	51.97	0.77	0.00	21.18	43.94	57.46	54.55	20.60	1.52	26.47	0.00	44.44	24.39	0.00	
Limited Review:																
Savannah AA	8	6.30	4.70	0.00	17.53	50.00	38.37	12.50	39.39	37.50	0.96	0.00	1.92	0.84	0.83	

* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Augusta AA	188	74.90	4.45	0.00	25.10	22.34	33.41	21.81	37.03	55.85	2.15	0.00	2.77	1.45	2.57
East Georgia AA	49	19.52	0.77	0.00	21.18	22.45	57.46	63.27	20.60	14.29	4.01	0.00	6.56	5.67	1.07
Limited Review:															
Savannah AA	14	5.58	4.70	0.00	17.53	57.14	38.37	14.29	39.39	28.57	0.11	0.00	0.56	0.07	0.06

* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Augusta AA	6	85.71	10.28	16.67	34.53	33.33	31.34	33.33	23.85	16.67	13.79	0.00	8.33	33.33	11.11
East Georgia AA	1	14.29	50.80	0.00	18.97	0.00	23.69	100.00	6.54	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Savannah AA	0	0.00	10.34	0.00	29.10	0.00	35.27	0.00	25.29	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: GEORGIA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total	Small Business Loans	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 Review:															
Augusta AA	602	59.55	7.30	6.31	22.15	22.92	32.64	35.88	37.92	34.88	5.45	5.07	7.21	6.69	4.22
East Georgia AA	322	31.85	3.72	1.24	21.58	38.51	57.17	56.21	17.53	4.04	8.10	2.02	16.33	9.58	1.08
Limited Review:															
Savannah AA	87	8.61	6.17	4.60	22.35	37.93	36.05	28.74	35.35	28.74	0.58	0.91	1.38	0.19	0.44

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area:	Total Small Farm Loans		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 Review:															
Augusta AA	108	22.55	4.05	0.00	29.13	64.81	33.18	34.26	33.64	0.93	45.95	0.00	58.06	53.57	0.00
East Georgia AA	368	76.83	0.00	0.00	19.24	29.62	61.65	69.29	19.11	1.09	43.98	0.00	62.07	45.95	0.00
Limited Review:															
Savannah AA	3	0.63	3.17	0.00	17.19	0.00	42.53	0.00	37.10	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Augusta AA	952	83.00	23.60	4.02	16.82	16.50	18.94	28.34	40.64	51.14	7.42	4.22	7.34	7.48	7.78
East Georgia AA	166	14.47	22.97	2.67	19.15	15.33	17.57	23.33	40.31	58.67	7.52	0.00	8.92	8.81	6.94
Limited Review:															
Savannah AA	29	2.53	22.09	0.00	17.53	9.52	19.85	28.57	40.53	61.90	0.09	0.00	0.09	0.07	0.12

^{*} Based on 2015 Peer Mortgage Data -- US and PR^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.^{***} Percentage of Families is based on the 2010 Census information.^{****} As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank.¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT				Geography: GEORGIA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Augusta AA	53	41.73	23.60	13.95	16.82	27.91	18.94	23.26	40.64	34.88	4.74	2.90	4.40	6.98	4.57
East Georgia AA	66	51.97	22.97	10.71	19.15	21.43	17.57	35.71	40.31	32.14	25.00	23.53	35.00	34.48	17.74
Limited Review:															
Savannah AA	8	6.30	22.09	0.00	17.53	0.00	19.85	33.33	40.53	66.67	1.02	0.00	0.00	1.96	1.55

^{*} Based on 2015 Peer Mortgage Data -- US and PR^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.^{***} Percentage of Families is based on the 2010 Census information.^{****} As a percentage of loans with borrower income information available. No information was available for 17.3% of loans originated and purchased by bank.² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Mortgage Refinance Loans	Low-Income Borrowers	Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp		
Full Review:															
Augusta AA	188	74.90	23.60	3.05	16.82	11.59	18.94	22.56	40.64	62.80	3.40	2.10	3.11	2.81	3.92
East Georgia AA	49	19.52	22.97	5.00	19.15	12.50	17.57	10.00	40.31	72.50	4.94	6.67	5.66	2.41	5.25
Limited Review:															
Savannah AA	14	5.58	22.09	0.00	17.53	10.00	19.85	20.00	40.53	70.00	0.13	0.00	0.31	0.20	0.08

^{*} Based on 2015 Peer Mortgage Data -- US and PR^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.^{***} Percentage of Families is based on the 2010 Census information.^{****} As a percentage of loans with borrower income information available. No information was available for 14.7% of loans originated and purchased by bank.³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: GEORGIA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016		
Assessment Area:	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 Review:									
Augusta AA	602	59.55	82.82	59.80	65.95	21.59	12.46	5.45	6.25
East Georgia AA	322	31.85	81.93	75.16	81.37	11.18	7.45	8.10	11.14
Limited Review:									
Savannah AA	87	8.61	82.60	59.77	56.32	21.84	21.84	0.58	0.60

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** 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 6.82% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: GEORGIA			Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016			
Assessment Area:	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 \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Augusta AA	108	22.55	97.20	58.33	61.11	18.52	20.37	45.95	44.26
East Georgia AA	368	76.83	97.29	70.92	70.65	18.75	10.60	43.98	51.63
Limited Review:									
Savannah AA	3	0.63	95.48	33.33	100.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** 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 10.44% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: GEORGIA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Augusta AA	1	739	26	87	27	826	31.77		
East GA AA	0	0	18	37	18	37	1.43	0	0
Limited Review:									
Savannah AA	0	0	2	1,737	2	1,737	66.80	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: GEORGIA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016									
Assessment Area:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA*	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)**				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
	Low	Mod	Mid	Upp	Low	Mod	Mid			Upp	Low	Mod	Mid	Upp			
Full Review:																	
Augusta AA	46.77	10	41.67	0.00	30.00	20.00	50.00	0	0	0	0	0	0	6.87	27.40	34.41	31.31
East Georgia AA	43.23	11	45.83	0.00	45.45	54.55	0.00	0	0	0	0	0	0	8.53	21.20	52.11	18.15
Limited Review:																	
Savannah AA	9.99	3	12.50	0.00	33.33	33.33	33.33	2	0	0	0	+1	+1	8.58	22.86	36.60	31.95

* As of June 30, 2016 based on FDIC Market Share Data.

** Based on 2017 FFIEC Geo Coding Data.

