

PUBLIC DISCLOSURE

July 30, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**SunTrust Bank, South Georgia, N.A.
Charter Number - 14907**

**410 West Broad
Albany, Georgia 31701**

**Comptroller of the Currency
Southeastern District Office
Marquis One Tower, Suite 600
245 Peachtree Center Avenue, N.E.
Atlanta , Georgia 30303-1223**

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

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GENERAL INFORMATION

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

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **SunTrust Bank, South Georgia, N.A.** (STB-South Ga.) prepared by **The Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **August 30, 1997**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.

INSTITUTION

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

The following are the primary factors supporting STB-South Ga.'s performance under the Lending, Investment, and Service Tests.

Lending Test

- STB-South Ga. has originated a high level of community development, small farm, and micro (\$20,000 or less) small business loans. These types of loans were identified as primary community needs. Additionally, a high percentage of the bank's loans were made within its assessment areas. The bank's geographic distribution of loans, and loans to borrowers of different income levels and businesses of different sizes, reflected adequate performance. Flexible lending practices were used on a limited basis to meet identified credit needs.

Investment Test

- STB-South Ga. has not made any qualified investments.

Service Test

- Delivery systems were accessible to areas and individuals of different income levels. The bank provided an adequate level of community development services.

The following table indicates the performance level of STB-South Ga., with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>SUNTRUST BANK, SOUTH GEORGIA, N.A.</u>		
	PERFORMANCE TESTS		
	Lending Test ¹	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve		X	
Substantial Noncompliance			

¹ The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

DESCRIPTION OF INSTITUTION AND ASSESSMENT AREA

STB-South Ga. is a subsidiary of SunTrust Banks, Inc. (STI), a \$56 billion institution headquartered in Atlanta, Georgia. STI, one of the 20 largest banking companies in the nation, operates financial institutions in Georgia, Florida, Tennessee, and Alabama. STB-South Ga., with total reported assets of \$634 million as of March 31, 1997, operates thirteen branch offices in Coffee (3), Dougherty (4), Mitchell (1), Terrell (1), Thomas (2), Tift (1), and Worth (1) counties. As of March 31, 1997, the bank's loan portfolio included commercial (\$77,978,000), agricultural (\$22,281,000), real estate (\$340,778,000), and consumer (\$54,048,000) loans. The bank also provides trust services. There are no legal, financial, or other reasons that would impede the bank's ability to meet the credit needs of its assessment areas.

STB-South Ga. has four assessment areas comprised of eight counties (see Table 1). In 1996, STB-South Ga. originated 54% and 47% of its HMDA and small business loans within the Albany, Georgia, Metropolitan Statistical Area (MSA) assessment area. As of June 30, 1996, 43% of STB-South Ga.'s total deposits were derived from the MSA. The bank didn't have a branch in Lee County, but it opened one on July 14, 1997. Bank management has chosen to include this county in its current assessment areas since a relatively significant amount of loans are originated from Lee County. Demographic data for each of these counties is detailed below.

Table 1						
Assessment Areas and Demographic Data ²						
Distribution of Geographies by Income Level						
Assessment Areas	Population	Low	Moderate	Middle	Upper	Total
Dougherty and Lee counties (Albany MSA)	112,561	7	7	12	8	34
Mitchell, Thomas, Tift, and Worth counties	114,004	0	10	20	3	33
Coffee County	29,592	0	1	6	1	8
Terrell County	10,653	0	1	4	0	5
Total	266,810	7	19	42	12	80

² Based on 1990 census data.

Dougherty and Lee counties are the counties that comprise the Albany, Georgia, MSA. As of 1990, approximately 30,000 families lived in this area. The distribution of families by income level was: 26% low income families, 15% moderate income families, 19% middle income families, and 40% upper income families. As of 1996, the MSA median family income was \$36,100, with 20% of the population living below the poverty level. All seven of the low income geographies within the bank's four assessment areas are located in the city of Albany (Dougherty County). Services (40%), manufacturing (27%), and wholesale trade (9%) represent 76% of the workforce. As of 1990, there were approximately 2,500 non-farm businesses and 100 farm businesses located in the Albany, Georgia, MSA. The number of non-farm businesses and farm businesses with gross revenues of less than \$1,000,000 were 1,645 and 68, respectively.

As of 1990, the median housing value for the Albany, Georgia, MSA was \$48,950. The Albany Home Builders Association reported that new starter homes of 1,200 to 1,400 square feet were priced from \$60,000 to \$70,000. In July of 1994, Tropical Storm Alberto severely flooded the city of Albany. Approximately 6,600 structures were damaged, including 5,900 residences (19% of the city's housing stock). Displaced persons were temporarily moved to mobile home parks operated by Federal Emergency Management Administration (FEMA) or moved in with relatives in other parts of the city. It is estimated that recovery from the flood will take five years. Presently, low income families and the elderly have the greatest need for low cost rental housing.

The counties of Coffee, Mitchell, Terrell, Thomas, Tift, and Worth are not located in a MSA. These six counties had approximately 42,000 families in 1990. The distribution of families by income level was 26% low income, 17% moderate income, 20% middle income, and 37% upper income. As of 1996, the state-wide non-MSA median family income was \$32,500. The economies of Coffee, Mitchell, Terrell, and Worth counties are primarily dependent on agricultural related businesses. The economies of Tift and Thomas counties are dependent on both farm and non farm related businesses.

Competition is strong. Approximately 40 deposit taking financial institutions have branch offices in the bank's assessment areas. STB-South Ga. is the largest financial institution in Coffee, Dougherty, and Worth counties based on deposit market share as of June 30, 1996.

The credit related needs in the bank's assessment areas include the following:

- Affordable housing (i.e. single family rental, multifamily rental, home ownership, and home rehabilitation) for low income individuals and the elderly. Public and rental assisted housing is especially needed in Albany, Georgia, as evidenced by a backlog of approximately 1,100 applicants waiting for housing assistance.
- Small business loans. According to a community contact from the University of Georgia Small Business Development Center, loans for amounts of \$20,000 or less

(micro small business loans) are especially needed for newly established or proposed businesses. Insufficient collateral was noted as a primary reason why small business owners do not qualify for a loan.

- Small farm loans primarily in Coffee, Mitchell, Terrell, Tift, Thomas, and Worth counties.
- Education pertaining to financial services such as home buying seminars, credit counseling, and small business counseling.

These community needs were determined by reviewing a combination of prior community contacts and a U.S. Department of Housing and Urban Development (HUD) Consolidated Strategy and Plan for the city of Albany, Georgia. HUD Consolidated Strategies and Plans are comprehensive planning documents that identify community needs. We also met with two community representatives during this examination pertaining to housing and small business needs.

Opportunities for qualified investments, although limited, do exist within the bank's assessment areas. These opportunities include a non-profit housing organization, credit counseling agency, small business development center, and community development corporation. The community development corporation's mission is to provide small business and affordable housing loans.

STB-South Ga. received a rating of "satisfactory" at the last CRA examination, dated December 30, 1994. This examination covers STB-South Ga.'s performance under the investment and service tests from January 1, 1995 to the present. The bank's performance under the lending test was evaluated from January 1, 1996 to the present. See the Appendix of this report for a definition of terms used within this public evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

In assessing STB-South Ga.'s lending performance, we focused our review on HMDA, small farm, and small business loans. The bank elected not to provide us consumer loan data for our review.

Assessment Area Concentration

A high percentage of STB-South Ga.'s loans were made within its assessment areas. Table 2

indicates that 92%, 90%, and 84%, respectively, of HMDA, small business, and small farm loans were originated within the bank's assessment areas.

Table 2				
Ratio of Loans Inside the Bank's Assessment Area (AA) - 1996				
	HMDA	Small Business	Small Farm	Total
Number				
# of Loans Inside AA	970	1,355	566	2,891
% of Loans Inside AA	92%	90%	84%	90%
Dollars (000's)				
\$ of Loans Inside AA	\$65,924	\$95,209	\$29,438	\$190,571
% of Loans Inside AA	90%	85%	82%	86%

Lending Activity

STB-South Ga.'s level of lending is considered very good and responsive to identified credit needs. Identified credit needs included micro small business loans, multifamily loans, and small farms loans. STB-South Ga. has originated 11 (\$4,117,000) multifamily loans, 687 (\$6,494,000) micro small business loans, and 566 (\$29,438,000) small farm loans within its assessment areas. Approximately 50% of all small business loans were micro small business loans. Table 2 and 3 reflect STB-South Ga.'s total volume of HMDA, small business, and small farm loans.

Table 3		
Number and Dollar Amount of HMDA Loans - 1996		
Loan Type	Number	Dollar (000's)
Home Purchase	470	\$36,590
Refinance	373	\$23,660
Home Improvement	116	\$1,557
Multifamily	11	\$4,117
Total	970	\$65,924

Geographic Distribution

STB-South Ga.'s geographic distribution of HMDA, small business, and small farm loans reflected an adequate penetration throughout its assessment areas. There were no conspicuous gaps in the penetration of geographies within the bank's assessment areas.

Three percent and 13% of HMDA loans were made in low and moderate income geographies, respectively. These low percentages are partially attributed to the lack of new construction of single family dwellings in the low and moderate income areas of Albany, Georgia.³ All seven low income geographies and five of the nineteen moderate income geographies are located in the city of Albany. There was one low income geography in which no HMDA loans were originated. However, this geography has a very low median income (\$10,155) which limits the number of individuals who could qualify for a home loan. HMDA loans were made in all moderate income geographies. Overall, STB-South Ga.'s penetration is considered good for low income geographies and adequate for moderate income geographies given the lack of new construction and the percentage of owner occupied units in these area. Refer to Table 4.

Table 4 Geographic Distribution of HMDA Loans by Geography Income Designation - 1996				
Geography Characteristics				Distribution of HMDA Loans
Geography Designation	Distribution of Geography by Income Level	Distribution of Families by Geography Designation	Distribution of Owner Occupied Housing Units by Geography Designation	
Low Income	9%	7%	4%	3%
Moderate Income	24%	24%	22%	13%
Middle Income	52%	50%	53%	44%
Upper Income	15%	19%	21%	40%
Total	100%	100%	100%	100%

Although STB-South Ga.'s HMDA penetration in low and moderate income geographies was

³ Information pertaining to new construction was obtained by a community contact from the city of Albany, Department of Community and Economic Development.

low, the bank did increase its penetration by originating small business and farm loans within these areas. STB-South Ga. originated 6% and 1% of its small business and farm loans in low income geographies. This penetration was considered adequate when compared to the percentage of businesses (9%) and farms (1%) located in low income geographies. Refer to Table 5.

STB-South Ga. originated 18% and 20% of its small business and farm loans in moderate income geographies. This penetration was considered adequate when compared to the percentage of businesses (22%) and farms (25%) located in moderate income geographies. Refer to Table 5.

Table 5 Geographic Distribution of Small Business and Farm Loans by Geography Designation - 1996					
Geography Designation	Distribution of Geography by Income Level	Distribution of Businesses by Geography Designation	Distribution of Small Business Loans by Geography Designation	Distribution of Farms by Geography Designation	Distribution of Small Farm Loans by Geography Designation
Low Income	9%	9%	6%	1%	1%
Moderate Income	24%	22%	18%	25%	20%
Middle Income	52%	55%	54%	54%	64%
Upper Income	15%	14%	22%	20%	15%
Total	100%	100%	100%	100%	100%

Distribution by Borrower Characteristics

STB-South Ga. 's distribution of HMDA, small business, and small farm loans to borrowers of different income levels and businesses of different sizes was adequate.

STB-South Ga. originated 4% of HMDA loans to low income individuals. Twenty-six percent of all families are considered low income. However, the bank's distribution is reasonable given that 22% of the population, in the four assessment areas, live below the poverty level. The high poverty rate would severely hamper an individual's ability to qualify for a home loan. Ten percent of HMDA loans were originated to moderate income individuals. This distribution is considered adequate when compared to the percentage (16%) of moderate income people within the bank's assessment area. Refer to Table 6.

Table 6 Distribution of HMDA Loans by Borrower Income Level - 1996		
Income Level	Distribution of Families by Income Level	Distribution of HMDA Loan By Borrower Income Level
Low Income	26%	4%
Moderate Income	16%	10%
Middle Income	20%	20%
Upper Income	38%	63%
Income Not Available	N.A.	3%
Total	100%	100%

Eighty-four percent and 87% of small business and farm loans, respectively, were for amounts of \$100,000 or less. See Table 7. Eighty-four percent (1,136 loans) and 91% (515 loans) of small business and farm loans were made to businesses that had gross revenues of less than \$1,000,000. Furthermore, 89% of small business loans with original amounts of \$100,000 or less were made to businesses that had gross revenues of less than \$1,000,000. The percentage for small farm loans was 93%. This indicates STB-South Ga. has a good record of serving the credit needs of very small businesses.

Table 7 Distribution of Small Business and Farm Loans by Loan Size - 1996		
Loan Size	Small Business Loans	Small Farm Loans
Less than \$100,000	84%	87%
Between \$100,000 and \$250,000	9%	10%
Greater than \$250,000	7%	3%
Total	100%	100%

Community Development Lending

As a result of the flood in Albany, Georgia, a primary community development lending need was affordable housing. STB-South Ga. originated a relatively high level of affordable housing units all of which are located in Albany, Georgia. Approximately \$6,900,000 of loans were originated relating to the construction of 1- 4 family housing units and the purchase or refinancing of multifamily housing units. The monthly rents for these units are affordable

for low or moderate income individuals. A summary of these loans and housing units are detailed below.

- Apartment Complexes: Loans were originated for \$3,215,000 to purchase three separate apartment complexes with a total of 233 units.
- Duplexes, quadraplexes, and larger multi-plexes: Loans were originated for \$3,685,000 to construct or refinance approximately 98 units.

Flexible or Innovative Lending Practices

STB-South Ga. makes limited use of flexible lending programs to meet identified credit needs of its assessment areas. Flexible lending programs pertaining to affordable housing have resulted in 13 loans for \$488,300. The characteristics of these programs are detailed below.

- SunTrust Affordable Housing Mortgage Program: This program is designed to promote home ownership by financing single family, owner occupied housing units to qualified low or moderate income individuals. This program allows for a reduced down payment, more lenient debt-to-income ratios, and the use of non-traditional credit references. The bank has originated ten loans for \$419,000.
- City of Albany's Tandem Loan Program: This program strives to offer low or moderate income Albany residents an opportunity to become a homeowner through a partnership with the city of Albany and local lending institutions. Individuals are eligible for this program if their dwelling (rental or owner occupied) was damaged by the flood or if they were economically priced out of the housing market due to the flood. Households must have a minimum gross annual income of \$12,000. The program allows individuals to have a maximum housing debt to income ratio and total debt to income ratio of 38% and 58%, respectively. The typical financing package consists of participating financial institutions providing 60% of loan proceeds, with the city of Albany providing the remaining 40%. The bank has originated three loans for \$69,300.

Investment Test

STB-South Ga has not made any qualified investments since January 1, 1995. Opportunities for qualified investments, although limited, do exist.

Service Test

Accessibility of Delivery Systems

STB-South Ga.'s delivery systems were accessible to areas and individuals of different income levels. The bank currently operates thirteen branch offices located in Coffee (3), Dougherty (4), Mitchell (1), Terrell (1), Thomas (2), Tift (1), and Worth (1) counties.

Branch hours are reasonable and do not significantly vary among the different branches. All thirteen branch offices provide the same level of financial services. Alternative delivery systems such as loan-by-phone and ATMs allow individuals to access STB-South Ga.'s financial products more conveniently. Loan-by-phone is a convenient way for individuals who lack transportation to obtain a consumer or residential loan without going to a branch office. Since loan-by-phone was introduced in April 1997, three consumer loans were originated for \$20,000. The three loan customers were moderate, middle, and upper income individuals.

STB-South Ga. has a reasonable distribution of branches in low, moderate, middle, and upper income geographies. Fifteen percent of STB-South Ga.'s branches are located in moderate income areas. This distribution is reasonable given that 23% of the geographies are categorized as moderate income. Although the bank doesn't have any branches in low income geographies, five of the seven low income areas are adjacent to other geographies in which branches are located. Loan data contained in Table 4 and Table 5 indicate the bank is doing an adequate job of serving the credit needs of business owners and families located in low income geographies.

Table 8 Distribution of Branch Offices			
Geography Characteristics	# of Branches	% of Total Branches	Distribution of Geography by Income Level
Low Income	0	0%	9%
Moderate Income	2	15%	24%
Middle Income	10	77%	52%
Upper Income	1	8%	15%
Total	13	100%	100%

Changes in Branch Locations

STB-South Ga.'s record of closing branch offices has not affected the accessibility of its

services to low or moderate income individuals or geographies. Since January 1, 1995, the bank has not closed, relocated, or opened any branch offices. However, the bank has received approval from our agency to relocate its main office from a middle income geography in downtown Albany, Georgia, to an unincorporated upper income geography in the southern most portion of Lee County. The proposed date of this relocation is July 14, 1997. The downtown Albany office will remain open as a branch. STB-South Ga. has also received approval from our agency to relocate the branch office located on Dawson Road (middle income geography) to North Westover Road (upper income geography), in Albany, Georgia. The proposed date of this relocation is also July 28, 1997.

Community Development Services

STB-South Ga. provides an adequate level of community development services within its assessment areas. The bank's community development services have primarily been related to small business development. Examples of these are detailed below.

- Albany Community Together (ACT): ACT is a proposed private-public economic action partnership between the city of Albany, local financial institutions, local businesses, and institutions of higher education. ACT's goal will be to create, expand, and finance small and medium size businesses located in low and moderate income geographies in south Albany, and to facilitate the overall economic recovery of this area by generating jobs, income, and wealth for residents. In order to meet this goal, a small business revolving loan fund would be established and administered by a Community Development Corporation. STB-South Ga. has been one of the main principals in an attempt to establish ACT, according to a representative of the consulting firm hired by the Albany City Commission. Representatives of STB-South Ga. have met with numerous community leaders to build support for ACT and assisted in developing underwriting guidelines for the small business revolving loan fund. Representatives of STB-South Ga. have spent over 100 hours in support of ACT.
- Georgia Development Authority (GDA): GDA originates small farm loans throughout the state of Georgia. A STB-South Ga. representative is a member of this organization's Executive Committee and is involved in the credit decision process.
- Community Development Center (CDC): CDC provides small business loans through the city of Albany. A STB-South Ga. representative is a member of this organization's Loan Review Committee and is involved in the credit decision process.
- Worth County Industrial Authority (WCIA): WCIA promotes job creation through economic development in Worth County. A STB-South Ga. representative is a board member of this organization and provides credit related expertise to new business owners.

- Associated Credit Executives (ACE): ACE provides small business seminars in Dougherty County. A STB-South Ga. representative has conducted two seminars.
- Sowega Economic Development Corporation (SEDC): SEDC is an agent for the Small Business Administration (SBA) and Rural Development Administration (RDA). As agent, SEDC processes government guaranteed loan applications for the SBA and RDA. A STB-South Ga. representative is a member of this organization's Loan Review Committee and is involved in the credit decision process.

Fair Lending Review

No violations of the substantive provisions of the anti-discrimination laws or regulations were identified. STB-South Ga.'s fair lending policies, procedures, training programs, and internal self-assessments are satisfactory.

ALBANY GEORGIA METROPOLITAN STATISTICAL AREA

Description of the Albany, Georgia, MSA

Refer to pages 3, 4, and 5 for a description of the Albany, Georgia, MSA.

Conclusions with Respect to Performance Tests in the Albany, Georgia, MSA

STB-South Ga.'s performance in meeting the credit needs of the Albany, Georgia, MSA is consistent with the overall rating assigned to STB-South Ga. Small farm loans were not used to draw conclusions since only nine loans for \$945,000 were originated in 1996.

Lending Test

Lending Activity

STB-South Ga.'s level of lending is considered good and responsive to the credit needs within the Albany, Georgia, MSA. Credit needs included micro small business and multifamily loans. STB-South Ga. has originated nine (\$3,936,000) multifamily and 194 (\$2,003,000) micro small business loans. Approximately 45% of the small business loans were for amounts of \$20,000 or less. Table 9 reflects STB-South Ga.'s total volume of HMDA and small business loans.

Table 9			
Number and Dollar Amount of HMDA and Small Business Loans - 1996			
	HMDA	Small Business	Total
Number	447	559	1,006
Dollar Amount (000's)	\$39,826	\$52,581	\$92,407

Geographic Distribution

STB-South Ga.'s geographic distribution of HMDA and small business loans reflected an adequate penetration. There were no conspicuous gaps in the penetration of geographies within the Albany, Georgia, MSA.

Six percent and 10% of HMDA loans were made in low and moderate income geographies,

respectively. As previously stated, these low percentages are partially attributed to the lack of new construction of single family dwellings in low and moderate income areas within Albany, Georgia. All seven low income geographies and five of the seven moderate income geographies within the Albany, Georgia, MSA are within the Albany city limits. Overall, STB-South Ga.'s penetration is considered adequate given the percentage of owner occupied units and the lack of new construction. Refer to table 10. HMDA loans were made in all moderate income geographies. The one low income geography in which no HMDA loans were originated had a very low median income. This fact limits the number of individuals who could qualify for a home loan.

Table 10 Geographic Distribution of HMDA Loans by Geography Income Designation - 1996				
Geography Characteristics				Distribution of HMDA Loans
Geography Designation	Distribution of Geography by Income Level	Distribution of Families by Geography Designation	Distribution of Owner Occupied Housing Units by Geography	
Low Income	20.5%	17%	10%	6%
Moderate Income	20.5%	22%	18%	10%
Middle Income	35%	30%	33%	23%
Upper Income	24%	31%	39%	60%
N.A.	0%	0%	0%	1%
Total	100%	100%	100%	100%

Fifteen percent and 17% of small business loans were made in low and moderate income geographies, respectively. This penetration was considered adequate when compared to the percentage of businesses located in low (21%) and moderate (18%) income geographies. Refer to Table 11.

Table 11 Geographic Distribution of Small Business Loans by Geography Designation - 1996			
Geography Designation	Distribution of Geography by Income Level	Distribution of Businesses by Geography Designation	Distribution of Small Business Loans by Geography Designation
Low Income	20.5%	21%	15%
Moderate Income	20.5%	18%	17%
Middle Income	35%	44%	41%
Upper Income	24%	17%	27%
Total	100%	100%	100%

Distribution by Borrower Characteristics

STB-South Ga.'s distribution of HMDA and small business loans to borrowers of different income levels and businesses of different sizes was adequate.

STB-South Ga. originated 3% of HMDA loans to low income individuals. Twenty-six percent of all families are considered low income. The bank's distribution is reasonable given the high poverty rate (23%) in Albany, Georgia. Nine percent of HMDA loans were originated to moderate income individuals. This distribution is considered adequate when compared to the percentage (15%) of moderate income people within the bank's assessment area. Refer to Table 12.

Table 12 Distribution of HMDA Loans by Borrower Income Level - 1996		
Income Level	Distribution of Families by Income Level	Distribution of HMDA Loan By Borrower Income Level
Low Income	26%	3%
Moderate Income	15%	9%
Middle Income	19%	18%
Upper Income	40%	65%
Income Not Available	N.A.	5%
Total	100%	100%

Seventy-nine percent of small business loans were for amounts of \$100,000 or less. See Table 13. Seventy-six percent (425 loans) of small business loans were made to businesses that had gross revenues of less than \$1,000,000. Furthermore, 82% of small business loans with original amounts of \$100,000 or less were made to businesses that had gross revenues of less than \$1,000,000. This indicates STB-South Ga. has a good record of serving the credit needs of very small businesses.

Table 13	
Distribution of Small Business Loans by Loan Size	
Loan Size	Percentage
Less than \$100,000	79%
Between \$100,000 and \$250,000	11%
Greater than \$250,000	10%
Total	100%

Community Development Lending

The primary community development lending need is affordable housing within the city of Albany. STB-South Ga has originated a relatively high level of affordable housing units in response to this need. Refer to page 9 for a description of the bank’s community development loans.

Flexible or Innovative Lending Practices

STB-South Ga. makes limited use of flexible lending programs to meet identified credit needs within the Albany, Georgia, MSA. Flexible lending programs have been limited to affordable mortgage loans originated through the SunTrust Affordable Housing Mortgage Program (seven loans for \$297,025) and City of Albany’s Tandem Loan Program (three loans for \$69,300). Refer to page 10 for a description of these programs.

Investment Test

STB-South Ga has not made any qualified investments since January 1, 1995.

Service Test

Retail banking services and alternative delivery systems are reasonably accessible to all portions of the Albany, Georgia, MSA. STB-South Ga. has a reasonable distribution of branches. See table 14. As previously mentioned, the bank doesn't have any branches located in low income geographies. Loan data in table 10 and 11 indicate, the bank is doing an adequate job of serving the needs of business owners and families in low income geographies.

Table 14 Distribution of Branch Offices			
Geography Characteristics	# of Branches	% of Total Branches	Distribution of Geography by Income Level
Low Income	0	0%	20.5%
Moderate Income	1	25%	20.5%
Middle Income	3	75%	35%
Upper Income	0	0%	24%
Total	4	100%	100%

STB-South Ga. provides an adequate level of community development services. Community development services have primarily been for small business development. Refer to page 12 for a description of these services.

APPENDIX

Definition of Terms

The following are definitions of terms used throughout this public evaluation. The definitions are not the strict legal definitions contained in 12 C.F.R. 25.12, but rather a more concise synopsis of their meaning.

Community Development - The primary purpose of the loan, investment, or service is for (1) affordable housing for low or moderate income individuals; (2) community services targeted to low or moderate income individuals; (3) activities that promote economic development by financing small businesses and farms; and (4) activities that revitalize or stabilize low or moderate income areas.

HMDA Loan - A residential real estate loan (home purchase, home refinance, home improvement, or multifamily)

Geography - A census tract or block numbering area.

Low, Moderate, Middle, and Upper Income Area - A low income area is one in which the median family income is less than 50% of the area median income, moderate income is 50% to 79% of the area median family income, middle income is 80% to 119% of the area median family income, and upper income is 120% or more of the area median family income.

Qualified Investment - A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Small Business Loan - A commercial loan with an original loan amount of \$1 million or less.

Small Farm Loan - A farm loan with an original loan amount of \$500,000 or less.