



**Comptroller of the Currency
Administrator of National Banks**

Southeastern District Office
One Marquis Tower, Suite 600
245 Peachtree Center Ave., N.E.
Atlanta, GA 30303

March 14, 1997

**Corporate Decision #97-17
April 1997**

Cindi Lewis
Vice President - Operations
ABC Bancorp, Inc.
P. O. Box 1500
Moultrie, Georgia 31776

Re: 96-SE-05-0189 - Application to establish a branch for First National Bank of South Georgia

Dear Ms. Lewis:

In response to your application dated December 12, 1996, the Office of the Comptroller of the Currency (OCC) has approved your request to establish a branch at 1607 U. S. 19 South, Leesburg, Georgia 31763.

As you are aware, a protest was filed by William Wright, president of the Albany-Dougherty National Association for the Advancement of Colored Persons. In his letter Mr. Wright states that the bank is not adequately marketing its services to the LMI individuals in south Albany. He also indicates that the bank is forcing LMI individuals to obtain other private financing due to its practice of redlining and disparate treatment. Based on these concerns, he has concluded that the bank is not meeting the spirit and intent of CRA and that it should consider placing a branch in south Albany prior to expanding into Lee County. The OCC investigated and thoroughly considered the comments submitted by Mr. Wright and found that the issues raised do not cause the OCC to question the institution's CRA ratings or warrant denial of this application. The OCC has addressed in detail the specific issues raised by Mr. Wright in separate correspondence to Mr. Wright, a copy of which is attached to this approval letter.

With regard to the branch approval, please note that if the branch is not opened within 18 months from this date, the approval shall automatically terminate unless the OCC has granted an extension of the time period.

The district office must be advised in writing at least 10 days in advance of the effective date desired for the branch opening so that the OCC may issue the necessary approval letters authorizing the branch.

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Please address any questions regarding this preliminary approval to the Bank Analysis Division at (404) 588-4525.

Very truly yours,

/s/

John O. Stein
Corporate Manager

Bank Charter No. 22042