



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

January 05, 2004

### Community Reinvestment Act **Performance Evaluation**

**Citizens & Peoples Bank, National Association**  
**Charter Number: 23416**

**2200 Airport Boulevard**  
**Pensacola, FL 32504**

**Office of the Comptroller of the Currency**

**ADC-Birmingham**  
**100 Concourse Parkway Suite 240**  
**Birmingham, AL 35244**

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **Satisfactory**.

The following table indicates the performance level of **Citizens & Peoples Bank, National Association (C&P)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Citizens & Peoples Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
Low Satisfactory			X
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:

- Overall lending levels reflect a good responsiveness to meeting the credit needs of the community.
- C&P made a substantial majority of its Home Mortgage Disclosure Act (HMDA) loans and small loans to businesses inside the Assessment Area (AA).
- C&P’s overall geographic distribution is good. The bank’s borrower distribution is adequate.
- The bank originated a significant dollar amount of community development loans during the review period. As a result, this had a positive impact on C&P’s lending test rating.
- The bank has an excellent level of qualified community development investments given its resources, capacity, and opportunities for investment.
- Service delivery systems are reasonably accessible to all geographies and individuals of different income levels in the AA.
- C&P has demonstrated satisfactory performance in providing community development services within its AA. These services had a positive impact on the Service Test rating.

## 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.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**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:** 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.

**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 household 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 or a block numbering area 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 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).

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

**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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

Citizens and Peoples Bank, N.A. (C&P) is wholly owned by Alabama NBC a multi-bank holding company located in Birmingham, Alabama. Alabama NBC owns 11 banks with total assets of approximately \$3.8 billion operating in Florida, Georgia, and Alabama. C&P is an intrastate bank with 3 branches operating in Escambia County. C&P has no subsidiaries and has not been involved in any merger or acquisition activity.

As of September 30, 2003, C&P reported assets of \$110 million and a Tier 1 Capital ratio of 6.77%. The loan to deposit ratio was 92.67%. The percentage of total assets represented by net loans was 74.05%. No legal, financial or other factors impede the bank's ability to help meet the needs in its AA. The loan portfolio is comprised of 82% real estate loans, 16% commercial loans, and 2% consumer loans. The real estate portfolio consists of 67% commercial loans, 33% 1-4 family residential loans, less than 1% multifamily loans and no agricultural loans. Commercial loans at 71% represent the largest lending product.

C&P's assessment area (AA) consists of the 58 CTs representing one of two counties in the Pensacola MA (Escambia County). All three C&P branches are located in Escambia County. The delineation of the Escambia AA does not reflect illegal discrimination or arbitrarily exclude low- or moderate-income geographies. See the market profile section of this evaluation for more details regarding the Escambia AA.

C&P's deposit market share rank in the Escambia AA is 10<sup>th</sup> (2.87% of the market share) of 18 competitors. Local banking competition is aggressive and includes affiliates of large national banking companies, regional banks, numerous community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: AmSouth Bank, Bank of Pensacola, Suntrust Bank, Bank of America, and Wachovia Bank.

Our contact with a local community development corporation identified small business financing as well as housing for low- and moderate-income individuals as the most pressing credit needs of the community. Primarily housing needs for low-income residents is for rental housing and 1-4 family housing for moderate-income residents.

The bank's business strategy is to continue to service small- and medium-size owner-operated businesses. The primary lines of business are commercial/industrial, commercial mortgage, and construction.

C&P's CRA performance was last evaluated on March 31, 1999, at which time the bank was rated "Satisfactory". A review of OCC records, as well as the bank's CRA Public File, did not reveal any complaints relating to the bank's CRA performance.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assessed the bank's performance under the Lending, Investment, and Services Tests. In evaluating the bank's lending performance, we reviewed C&P's residential mortgage loans and small business loans. C&P did not have any agricultural lending and multi-family lending was minimal; therefore they are not included in our review. While there are farms located within the AA, they are not located in close proximity to C&P's branches. Consumer lending does not represent a substantial majority of the bank's lending activity, therefore the bank did not provide data on consumer lending for evaluation.

The evaluation period under the lending test was January 1, 1999 through December 31, 2002. For CD loans and the Investment and Service tests, the evaluation period is April 1, 1999 through January 5, 2004. The Investment Test conclusions are based on an evaluation of investments and donations made in the bank's AA that meet the definition of community development. The Service Test was evaluated based on branch distribution, hours of operation, branch opening and closings, alternative delivery systems, retail and commercial deposit and loan products and service, and community development services.

### Data Integrity

Prior to this CRA examination, OCC personnel verified the accuracy of data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes home mortgage lending and small loans to businesses and farms. We found C&P's processes and internal controls for collecting, verifying, and reporting HMDA and CRA loan data satisfactory. The few errors found were corrected and data was considered accurate. We reviewed CD loans, service and investments to ensure they qualified as community development.

### Selection of Areas for Full-Scope Review

C&P has one AA, which received a full-scope review. Please refer to the table in Appendix A for more information.

### Ratings

Small business lending was given the greatest weight under the lending test since it is the bank's primary business line, followed by home purchase mortgage lending. Consumer lending does not represent a substantial majority of the bank's lending activities; therefore the bank did not provide data on consumer lending for evaluation.

### Other

Our contact with a local community development corporation identified small business financing as well as housing for low and moderate-income individuals as the most pressing credit needs in the AA. The primary housing need for low-income residents is rental housing and 1-4 family purchase housing for moderate-income residents.

### Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices

## 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 "high satisfactory". Based on full-scope reviews, the bank's performance in the Escambia AA is satisfactory.

#### Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in appendix C for the facts and data used to evaluate the bank's lending activity.

In the Escambia AA, approximately 81% of the number and 84% of the dollar amount of C&P's reported loans were small loans to businesses. Only 19% of the number and 16% of the dollar amount were home mortgage related. C&P has a 2.87% market share of deposits in the Escambia AA. The market share for loans is 1.25% (15<sup>th</sup>) for small loans to businesses and .12% (93<sup>rd</sup>) of home mortgage loans. C&P's loan to deposit ratios is higher than its competitors.

Due to C&P's small market share of home mortgage loans and their primary focus on small loans to businesses, our analysis of lending activity will be weighted toward small business lending. Our home mortgage loan analysis will focus on home purchase loans due to the limited number of home improvement and home refinancing loans originated by C&P.

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

##### *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.

The overall geographic distribution of home purchase loans is adequate when considering the barriers for families in low- and moderate-geographies to purchase a home in the Escambia AA. The median housing cost in low-income geographies is \$32,363 and \$34,461 in moderate-income geographies. In low-income geographies, 46% of the families are below the poverty level. In moderate-income geographies, 28% of families are below the poverty level. The 1990 average median families income in low- and moderate-income geographies is \$11,625 and \$20,567 respectively, making a home purchase difficult. We considered these mitigating factors in our home mortgage lending analysis to low-or moderate-income geographies.

C&P percentage of home purchase loans in low-income tracts is slightly higher than the percentage of owner-occupied units in these tracts. C&P's percentage of home purchase loans in moderate-income tracts is significantly less than the percentage of owner-occupied

units in these tracts. C&P originated no home purchase loans in low- and moderate-income tracts in 2002, therefore they have no 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.

The geographic distribution of small loans to businesses is good. C&P’s percentage of loans in low-income tracts exceeds the percentage of businesses located in these tracts. C&P’s percentage of loans in moderate-income tracts is slightly less than the percentage of businesses located in these tracts. C&P’s market share in both low- and moderate-income tracts excess its overall market share.

***Lending Gap Analysis***

We reviewed reports detailing the bank’s lending distribution during the evaluation period to determine any unexplained gaps in the geographic distribution of loans. Unexplained conspicuous gaps were not identified. This performance had a positive effect on the bank’s overall geographic distribution analysis.

***Inside/Outside Ratio***

A substantial majority of C&P’s loan originations and purchases were inside the assessment area. By product the bank originated the following percentage of loans inside its AA.

<b>Loan Type</b>	<b>% Inside</b>
Home Purchase	72%
Refinance	79%
Home Improvement	100%
Small Loans to Businesses	90%
<b>Overall</b>	<b>87%</b>

This performance was positively factored in the overall analysis of the geographic distribution of lending.

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

***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.

The overall distribution of home purchase loans by income is adequate. The percent of home purchase loan originated to low- and moderate-income borrowers is significantly less than the percent of low- and moderate-income families in the AA. However it is difficult for low-income persons, and somewhat difficult for moderate-income persons to purchase a home in the AA. Sixteen percent of the households in the AA live below the poverty level. A low-income family

earning on average less than \$22,650 would have difficulty purchasing a home in the Escambia AA, where the median housing cost is \$60,327 based on 1990 census data and is \$84,444 based on 2000 updated information. A moderate-income family earning on average is less than \$36,240 would also have some difficulty purchasing a home. C&P originated no home purchase loans to low- and moderate-income borrower in 2002; therefore they have no 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.

The distribution of small loans to businesses is adequate. C&P's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is less than the percentage of small business in the AA. C&P's market share to these small businesses exceeds their overall market share of small loans to all businesses. Also their distribution of small loans to businesses by loan size shows their willingness to target small businesses.

### **Community Development Lending**

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.

CD lending has a positive impact on Lending Test conclusions. C&P had a high level of CD lending that is responsive to the identified needs in the AA and enhances its overall good level of small business lending in the Escambia AA. C&P made 4 CD loans totaling \$522,000 in the Escambia AA. Two loans totaling \$350,000 were made to a local CDC. One loan provided Gap loan program assistance to small businesses within low- to moderate-income tracts. The other loan financed rental housing for low-income families assisted through the HUD HOME rental program. Other CDC loans were made to Habitat for Humanity (funding for a new home) and a local builder. The line of credit to the local builder is used to purchase and renovate distressed properties rented to low-income families using the HUD vouchers program.

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, however.

### **Product Innovation and Flexibility**

The bank participates in the flexible lending programs described below. There were no innovative lending programs.

- State Housing Initiatives Partnership (SHIP) Program – 4 loans - \$297,845.

This is a State of Florida program that allocates affordable housing funds to counties. SHIP funds can be utilized for a number of purposes including new construction, down payment

assistance, rehabilitation, land acquisition, impact fee loans, closing cost loans, and funding for community based organization that provide housing.

- USDA Rural Housing Guarantee Loan Program – 7 loans - \$764,690.

This is a Federal program that provides funds for home purchase in rural areas for low- and moderate- income families. Terms are flexible and include 100% financing with no mortgage insurance or down payment, closing cost may be included in the loan amount, and flexible debt ratio calculation.

## **INVESTMENT TEST**

The bank's performance under the investment test is rated Outstanding. Based on the full-scope review, the bank's performance in the Escambia AA is excellent.

Refer to Table 10 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Qualifying investments are investments that have as their primary purpose community development, as defined in the CRA regulation. In evaluating the bank's overall level of qualified investments, we considered the opportunities available to invest in CD's in the AA as well as the capacity for the local community to create qualified investments. Qualified CD investment opportunities in the Escambia AA are somewhat limited. There is strong competition for these investments from larger institutions in the AA and C&P is participating in those qualified investments that are available. The following investments are responsive to the identified needs in the AA.

During the evaluation period, C&P purchased \$581,522 in FHLMC Bonds with specific criteria to assist low- and moderate-income families purchase homes in the Escambia County AA. In addition, C&P provided \$100,000 to Community Enterprise Investment Inc. (CEII), a Community Development Corporation (CDC) based in Pensacola, which provides a variety of small business lending, affordable housing and community development programs in the Escambia AA. This specific investment funded a GAP loan fund providing loans to small and Micro business in the Escambia AA. During the evaluation period, C&P also contributed \$5,615 to various community organizations serving the needs of the low- and moderate-income families in the Escambia AA.

## **SERVICE TEST**

The bank's performance under the Service Test is rated "Low Satisfactory". Based on the full-scope review, the bank's performance in the Escambia AA is adequate.

## **Retail Banking Services**

Refer to Table 14 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.

The quantity, quality and accessibility of C&P's retail banking system are adequate. Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. C&P operates three offices in the Escambia AA. C&P's main office is in a NA tract,

which contains a population of only 95 and no reported incomes. Although the main office is a NA tract, it is adjacent to two low-income tracts and one moderate-income tract, which allow the bank to service of needs of these areas. The other two branch offices are located in middle-income tracts. All three ATMs are located onsite with the branches. C&P also provide other alternative delivery systems with Internet banking.

Since the previous CRA evaluation, the bank has opened one full-service branch, which is located in a middle-income tract. No bank branches have been closed in the Escambia AA since the previous evaluation.

C&P provides a wide range of services at each of its three offices. Services provided at the various branches are not dependent upon the income-geography of the branch, and do not vary in any way that would inconvenience portions of the AAs.

### **Community Development Services**

C&P has demonstrated satisfactory performance in providing CD services within its AA. This assessment is based on the number and impact of organizations served as well as the impact of these organizations on identified CD needs in the community. The bank is participating in most of the available opportunities in the AA. C&P employees and officers are directly involved in providing leadership and services to 11 organizations that provide CD services within the AA. During the evaluation period, C&P provided services that promote increased homeownership opportunities for LMI individual and families, promote economic development within the AA, and sponsored the delivery of community services targeted to low- or moderate-income people. C&P provided CD services in the AA through technical assistance and ongoing education to organizations such as Habitat for Humanity and Allvista Solutions. C&P also participates in many organization's events whose primary purpose is to service the LMI individuals in the AA. Organizations include Habitat for Humanity, Community Enterprise Investment, Inc. (CEII), Pensacola Small Business Development Expo for Women and Minority Business Owners and Pensacola Affordable Housing Expo. Bank officer regularly provide leadership to many of the above-mentioned organizations, as well as other within the AA, through service on committees or Board. Examples of leadership roles include:

- Lending Committee - Community Enterprise Investment, Inc. (CEII) - 2000-2003
- President of the Board – Catholic Charities – provides family counseling and financial planning to low-income individuals – 2001-2003
- Board Member – Sacred Heart Foundation – provides funds to assist low income families with medical care – 2001-2003
- Education Instructor – Habitat for Humanity – 2000-2003
- Class Room Instructor – Junior Achievement – provides financial literacy training to low income intercity schools – 2001-2003
- Consultant – Altavista Solutions – provide homebuyer seminar for low- and moderate-income individuals – 2002-2003

## 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 non-metropolitan 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 1/1/1999-12/31/2002 Investment and Service Tests and CD Loans: 4/1/1999-1/5/2004	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
C&P	Small loans to businesses and home mortgage loans.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Alabama NBC	Holding Company	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Escambia AA (Escambia County)	Full Scope	None

## Appendix B: Market Profiles for Full-Scope Areas

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### Escambia AA

Demographic Information for Full Scope Area: Escambia AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	54	11.11	16.67	48.15	16.67	7.41
Population by Geography	262,798	5.34	12.08	57.19	25.08	0.31
Owner-Occupied Housing by Geography	63,835	4.12	10.13	57.65	28.10	0.00
Business by Geography	13,713	7.56	15.36	63.77	6.94	6.36
Farms by Geography	338	4.14	10.36	75.15	8.58	1.78
Family Distribution by Income Level	70,784	21.27	18.09	21.68	38.96	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	27,857	9.10	18.08	57.88	14.94	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		29,922 45,300 16.02%	Median Housing Value Unemployment Rate (1990 US Census)		60,327 3.1%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 US Census and 2002 HUD updated MFI

The Escambia AA consists of Escambia County. The AA includes the major city of Pensacola. There are 54 CTs in the AA: 6 low-income, 9 moderate-income, 26 middle-income and 9 upper-income. C&P is not the market leader; ranking 10<sup>th</sup> in deposits with a 2.87% market share. Local banking competition is aggressive and includes affiliates of large national banking companies, regional banks, numerous community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: AmSouth Bank, Bank of Pensacola, Suntrust Bank, Bank of America, and Wachovia Bank.

Opportunities for banks to participate in CD loans, investments, and service in the Escambia AA are somewhat limited and competition to participate is strong.

#### Population

The population living in the Escambia AA was 262,798 in 1990 and is projected to be 294,410 in 2000. The number of families in the Escambia AA was 70,784 in 1990 but is projected to be 74,528 in 2000. The percentage of families by income level is 21.27% low-income, 18.09% moderate-income, 21.68% middle-income and 38.96% upper-income.

#### Dwellings

In 1990, housing stock was 112,230 with 63,835 owner-occupied units. In 2000, housing stock is estimated to be 124,647 with 74,690 owner-occupied units. The average price in Escambia AA was \$60,327 but is projected to have risen to \$84,444 in 2000, making affordability

questionable for low-income borrowers with income less than \$22,650. In addition, many of the low- and moderate-income individuals are military, where on base housing is provided.

Employment

The local economy is government, tourism, military and private service oriented. The economy of Escambia County is heavily dependent on the local military installations and remains stable because of that association. Major employers in Escambia County are: Pensacola Naval Air Station and related training facilities such as Saufley Field, Corry Station and NAS Whiting Field. The unemployment rate for the Pensacola MA for November 2003 of 3.7% is significantly lower than the State rate of 4.7%.

## Appendix C: Tables of Performance Data

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### 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: 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. 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 MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- 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. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- 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. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 distribution of families by income level in each MA/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** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- 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 (OPTIONAL)** - 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 MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/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.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

**Table 1. Lending Volume**

LENDING VOLUME		Geography: ESCAMBIA AA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area (2002):	% 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)	
<b>Full Review:</b>												
Escambia AA	100.00	72	8,713	306	47,003	0	0	4	522,000	382	577,716	100.00

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From April 01, 1999 to January 05, 2004.

\*\*\* Deposit Data as of September 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE 2002		Geography: ESCAMBIA AA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/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 Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	48	100.00	4.12	4.17	10.13	2.08	57.65	33.33	28.10	60.42	0.21	0.00	0.00	0.07	0.43

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME IMPROVEMENT 31, 2002			Geography: ESCAMBIA AA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER						
MA/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 Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	8	100.00	4.12	0.00	10.13	0.00	57.65	75.00	28.10	25.00	0.17	0.00	0.00	0.00	0.53

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2002			Geography: ESCAMBIA AA						Evaluation Period: JANUARY 1, 1999 TO						
MA/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	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	15	100.00	4.12	0.00	10.13	0.00	57.65	80.00	28.10	20.00	0.02	0.00	0.00	0.02	0.03

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY 2002		Geography: ESCAMBIA AA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/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	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	1	100.0 0	6.41	0.00	6.41	0.00	42.54	0.00	44.63	100.00	4.35	0.00	0.00	0.00	7.69

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2002			Geography: ESCAMBIA AA								Evaluation Period: JANUARY 1, 1999 TO				
MA/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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	306	100.00	7.56	11.28	15.36	12.78	63.77	50.38	6.94	25.56	1.19	1.48	1.29	1.06	0.86

\* Based on 2002 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 (2003).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ESCAMBIA AA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/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	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	0	0.00	4.14	0.00	10.36	0.00	75.15	0.00	8.58	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2002 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 (2003).

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

Borrower Distribution: HOME PURCHASE 2002		Geography: ESCAMBIA AA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/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**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	48	100.00	21.27	2.27	18.09	9.09	21.68	6.82	38.96	81.82	0.17	0.00	0.00	0.00	0.38

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* As a percentage of loans with borrower income information available. No information was available for 8.33% of loans originated and purchased by BANK.

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

\*\*\*\* 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.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT 2002		Geography: ESCAMBIA AA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	8	100.00	21.27	37.50	18.09	12.50	21.68	12.50	38.96	37.50	0.17	0.00	0.00	0.00	0.36

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Southeast Region 1.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> 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.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2002		Geography: ESCAMBIA AA								Evaluation Period: JANUARY 1, 1999 TO					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Escambia AA	15	100.00	21.27	0.00	18.09	35.71	21.68	14.29	38.96	50.00	0.03	0.00	0.17	0.00	0.00

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Southeast Region 1.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 6.67% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2002		Geography: ESCAMBIA AA				Evaluation Period: JANUARY 1, 1999 TO			
MA/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****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Escambia AA	306	100.00	63.69	41.50	57.84	24.84	17.32	1.19	1.25

\* Based on 2002 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 - 2003).

\*\*\*\* 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 25.16% 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 31, 2002		Geography: ESCAMBIA AA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER			
MA/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 \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Escambia AA	0	0.00	88.17	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2002 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 - 2003).

\*\*\*\* 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 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ESCAMBIA AA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Escambia AA	0	0	18	588,132	18	588,132	100.00	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation 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: ESCAMBIA AA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002			
MA/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
<b>Full Review:</b>																	
Escambia AA	100.00	3	100	0.00	0.00	67.0	0.00	1	0	0	0	1	0	5.34	12.08	57.19	25.08