



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

February 21, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

AB&T National Bank
Charter Number: 23752

2815 Meredyth Drive
Albany, Georgia 31708

Office of the Comptroller of the Currency

Atlanta Field Office –Midtown 1475 Peachtree Street, N.E. Atlanta, Georgia 30309

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

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

State Name: Georgia Rating: Outstanding

State Name: Alabama Rating: Outstanding

The performance rating is supported by the following factors:

- The loan-to-deposit ratio exceeds the standard for reasonable performance given the bank's size, financial condition, and competition.
- A substantial majority of loans are granted inside the bank's combined assessment area.
- The penetration of loans to borrowers of different income levels within the assessment area is reasonable.
- The distribution of loans to businesses of different sizes is excellent.
- The geographic distribution of loans reflects an excellent dispersion throughout the assessment area.

Scope of Examination

This CRA Performance Evaluation is an assessment of AB&T National Bank's (AB&T) ability to meet the credit needs of its community. Examiners conducted a full-scope review of two of the bank's three assessment areas (AA). The bank was evaluated utilizing the Small Bank examination procedures. The evaluation covers the period of January 1, 2009 to December 31, 2011, and is based upon the bank's residential mortgage and small business lending activities. The bank has no lending affiliates. Prior to the commencement of this review, a data integrity review was performed of the bank's loans reported under the Home Mortgage Disclosure Act (HMDA) and its small business lending compared to the bank's source files and other internal records.

Description of Institution

AB&T is a wholly-owned subsidiary of Community Capital Bancshares, Inc., Albany, Georgia. The bank has four full-service facilities, the main office in Albany, Georgia, and branch offices in Albany and Leesburg, Georgia and Auburn, Alabama. One branch (Leesburg, Georgia) was relocated (January 2011) and one (Dothan, Alabama) was closed during the review period (March 2011). The bank has automated teller machines (ATM) at all branch locations, and one non-bank location in Albany. None of the ATMs accepts deposits. AB&T offers internet banking services through its website at <http://www.abtgold.com/>. There are no financial conditions, legal constraints, or other factors hindering the bank's ability to help meet the credit needs of its combined AA. The prior CRA Performance Evaluation, dated March 12, 2007, resulted in a "Satisfactory" rating.

AB&T offers traditional loan and deposit products. As of December 31, 2011, AB&T's assets totaled \$148.5 million, of which net loans comprised 69.0 percent. Loan products include commercial/industrial, consumer, farmland/agriculture, and residential real estate. Based upon the dollar of loans, our analysis of the bank's lending included the two primary loan types: residential real estate and business loans. The loan portfolio composition at December 31, 2011 was reported as follows:

<i>Loan Category</i>	<i>\$ (000s)</i>	<i>% of \$</i>
Commercial & Industrial including CRE	\$ 55,420	53.0%
Residential Mortgage Loans	39,251	37.5%
Individuals/Consumer	4,058	3.9%
Farmland and Agriculture	4,500	4.3%
All Other	1,370	1.3%
Total	\$ 104,599	100%

Source: December 31, 2011 Call Report

DESCRIPTION OF COMBINED ASSESSMENT AREA (AA)

AB&T's AAs are predominately rural. Leading industries include regional medical facilities, light manufacturing, agriculture, timber, and education. Major employers include Wal-Mart Corporation, Auburn University, Marine Corps Logistics Base, Proctor & Gamble, Miller Brewing Company, Southeast Alabama Medical Center, and Phoebe Putney Health Systems, as well as the school systems for all four counties. Competition to provide financial services within the combined AA remains strong. AB&T's major competitors include nine larger, regional commercial banks.

Community Contact

During the CRA evaluation, it is customary for examiners to contact organizations within the assessment area(s) for information regarding local economic conditions and credit needs. The community contacts conducted in connection with this evaluation stated that community credit needs are being met by local institutions. Financial institutions in the local area were noted as actively meeting the loan needs of the community.

Conclusions with Respect to Performance Criteria

HMDA report data was available since the bank has offices located within MSAs. A random sample of primary loan products was selected to verify the accuracy of the HMDA data and to evaluate CRA lending performance. Business loans were also sampled to determine the accuracy of the bank's internal records.

Loan-to-Deposit Ratio

AB&T's loan-to-deposit (LTD) ratio is more than reasonable and exceeds the standards for satisfactory performance. The bank's quarterly LTD ratio averaged 81.9 percent since January 2009, which is in line with the average quarterly ratio of 81.0 percent for three similarly-situated banks. This ratio ranged from a low of 66.9 percent to a high of 88.6 percent.

Lending in Assessment Area

AB&T's lending within the combined AAs exceeds the standard for satisfactory performance with a majority of loans originated inside the combined AAs.

Table 1 - Lending within the Combined Assessment Area										
Loan Type	Number of Loans					Dollars of Loans				
	Inside AA		Outside AA		Total	Inside AA		Outside AA		Total
	#	%	#	%		\$(000)	%	\$(000)	%	
Residential Real Estate	227	76.4	70	23.6	297	32,322	82.7	6,768	17.3	39,090
Business/Farm	44	73.3	16	27.7	60	8,460	63.8	4,802	36.2	13,262
Totals	271	75.9	86	24.1	357	\$40,782	77.9	\$11,570	22.1	\$52,352

Source: Sample of business loans and HMD analysis.

The majority of AB&T's mortgage loan originations are generated within the Albany AA. The following table presents the Institution's overall mortgage lending activity during the review period separated by AA:

Assessment Area	Originations
Albany MSA	173/ 76.2%
Auburn MSA	32/ 14.1%
Dothan MSA	22/ 9.7%
Totals	227/100.0%

In addition, the bank's deposits, as of December 31, 2011, were dispersed within the AAs as detailed below:

Assessment Area	Deposits (000's)
Albany MSA	97.7/ 82.0%
Auburn MSA	18.9/ 15.9%
Dothan MSA	2.5/ 2.1%
Totals	119.1/100.0%

State Rating

State of Georgia

CRA Rating for Georgia: Outstanding

The performance rating is supported by the following factors:

- The distribution of loans to borrowers of different income levels within this AA reflects a reasonable penetration.
- The distribution of loans to businesses of different sizes within this AA also reflects an excellent penetration.
- The geographic distribution of loans reflects an excellent dispersion throughout this AA.

Description of Assessment Area

For purposes of this review, AB&T's AA in Georgia includes all of Dougherty and Lee Counties. This AA is comprised of 35 CTs and is located within the Albany, Georgia MSA. This AA contains four low-, 11 moderate-, 10 middle-, and 10 upper-income CTs, and does not arbitrarily exclude any low- or moderate-income geography. The table below highlights the demographic composition of this AA:

Demographic and Economic Characteristics of the Albany Assessment Area	
Population	<i>AB&T Albany AA</i>
Number of Families	31,276
Number of Households	43,827
Geographies	
Number of Census Tracts	35
% Low Income Census Tracts	11.4%
% Moderate Income Census Tracts	31.4%
% Middle Income Census Tracts	28.6%
% Upper Income Census Tracts	28.6%
Median Family Income (MFI)	
2000 HUD Adjusted MFI for Albany, Georgia MSA	\$42,400
2011 HUD Adjusted MFI for Albany, Georgia MSA	\$48,700
Economic Indicators	
December 2011 Unemployment Rate Albany MSA	9.9%
2000 Median Housing Value Albany AA	\$71,945
% of Households Below Poverty Level Albany AA	19.7%
% of Families Below Poverty Level Albany AA	16.7%

Source: U.S. 2000 Census, HUD, Georgia Department of Labor.

AB&T’s AA is predominantly rural. Leading industries include regional medical facilities, light manufacturing, agriculture, timber, and education. Major employers include Wal-Mart Corporation, Marine Corps Logistics Base, Proctor & Gamble, Miller Brewing Company, and Phoebe Putney Health Systems, as well as the school systems for both counties. Competition to provide financial services within this AA remains strong. AB&T’s major competitors include four larger, regional, commercial banks.

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

AB&T’s overall level of lending to borrowers of different incomes and to businesses of different sizes within this AA is reasonable and meets the standards for satisfactory performance. The bank’s distribution of loans reflects reasonable penetration among individuals of different income levels. Although the percentage of lending to low-income families is below the demographic benchmark, this AA’s family poverty level rate at 16.7 percent also represents a mitigating factor. Lending to moderate-income families is also low in comparison with the demographic benchmark.

Table 2 - Borrower Income Distribution of Residential Real Estate Loans within the Albany AA

Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Residential	24.4%	3.6%	15.2%	7.2%	18.3%	12.1%	42.1%	77.1%

Source: U.S. Census Data and HMDA analysis.

However, lending to businesses of different sizes within this AA reflects an excellent penetration. The number and dollar volume of loans made to businesses with revenues less than \$1 million is higher than the percentage for the number of small businesses within this AA.

Table 2A - Income Distribution of Loans to Businesses within the Albany AA

Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	76.2%	3.2%	20.6%	100%
% of Bank Loans in AA by #	83.3%	16.7%	0%	100%
% of Bank Loans in AA by \$	90.4%	9.6%	0%	100%

Source: Loan sample; Dunn and Bradstreet data.

Geographic Distribution of Loans

AB&T's geographic distribution of loans within this AA reflects an excellent dispersion and exceeds the standards for satisfactory performance. The volume of loans originated within the low- and moderate-income CTs is generally commensurate with the percentage of OOHUs within these CTs.

Table 3 - Geographic Distribution of Residential Real Estate Loans within the Albany AA								
CT Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Residential	4.5%	3.5%	23.3%	21.4%	29.4%	21.9%	42.8%	53.2%

Source: U.S. Census Data and HMDA Data

The percentage of loans granted to businesses and farms within the low-and moderate-income geographies exceeds the percentage of businesses and farms within these CTs. The bank's geographic distribution of business loans reflects excellent dispersion throughout the CTs within this AA.

Table 3A - Geographic Distribution of Loans to Businesses/Farms within the Albany AA								
CT Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Bus/Farms	% of Number of Loans	% of AA Bus/Farms	% of Number of Loans	% of AA Bus/Farms	% of Number of Loans	% of AA Bus/Farms	% of Number of Loans
Commercial	10.2%	5.6%	30.7%	25.0%	24.2%	33.3%	34.9%	36.1%

Source: U.S. Census Data and Loan Sample

State Rating

State of Alabama

CRA Rating for Alabama: Outstanding

The performance rating is supported by the following factors:

- The distribution of loans to borrowers of different income levels within this AA reflects a reasonable penetration.
- The distribution of loans to businesses of different sizes within this AA also reflects an excellent penetration.
- The geographic distribution of loans reflects an excellent dispersion throughout this AA.

Description of Assessment Area(s)

For purposes of this review, AB&T operated within two AAs in Alabama during the review period, Houston (Dothan) and Lee (Auburn) Counties, Alabama.

The Auburn AA is comprised of 21 CTs and is located within the Auburn, Alabama MSA. The Auburn AA contains three low-, four moderate-, 10 middle-, and four upper-income CTs, meets the technical requirements of the Act, and does not arbitrarily exclude any low- or moderate-income geography. The table below highlights the demographic composition of the bank's Auburn AA:

Demographic and Economic Characteristics of the Auburn Assessment Area	
Population	<i>AB&T Auburn AA</i>
Number of Families	27,613
Number of Households	45,751
Geographies	
Number of Census Tracts	21
% Low Income Census Tracts	14.4%
% Moderate Income Census Tracts (3)	19.0%
% Middle Income Census Tracts (5)	47.6%
% Upper Income Census Tracts	19.0%
Median Family Income (MFI)	
2000 HUD Adjusted MFI for Auburn, Alabama MSA	\$46,400
2011 HUD Adjusted MFI for Auburn, Alabama MSA	\$60,600
Economic Indicators	
December 2011 Unemployment Rate Auburn MSA	8.2%
2000 Median Housing Value Auburn AA	\$87,285

% of Households Below Poverty Level Auburn AA	25.2%
% of Families Below Poverty Level Auburn AA	11.1%

Source: U.S. 2000 Census, HUD, Alabama Department of Labor.

The Dothan AA is also comprised of 21 CTs and is located within the Dothan, Alabama MSA. Although the branch in Dothan was closed during the review period, Houston County, Alabama, is included as an AA since the bank operated a Dothan branch for all of 2009 and 2010 and the first quarter of 2011. This AA contains one low-, four moderate-, 11 middle-, and five upper-income CTs, meets the technical requirements of the Act, and does not arbitrarily exclude any low- or moderate-income geography. The table below highlights the demographic composition of the bank's Dothan AA:

Demographic and Economic Characteristics of the Dothan Assessment Area	
Population	<i>AB&T Dothan AA</i>
Number of Families	25,286
Number of Households	35,861
Geographies	
Number of Census Tracts	21
% Low Income Census Tracts	4.8%
% Moderate Income Census Tracts (3)	19.0%
% Middle Income Census Tracts (5)	52.4%
% Upper Income Census Tracts	23.8%
Median Family Income (MFI)	
2000 HUD Adjusted MFI for Dothan, Alabama MSA	\$43,400
2011 HUD Adjusted MFI for Dothan, Alabama MSA	\$51,200
Economic Indicators	
December 2011 Unemployment Rate Dothan MSA	8.4%
2000 Median Housing Value Dothan AA	\$77,334
% of Households Below Poverty Level Dothan AA	15.8%
% of Families Below Poverty Level Dothan AA	11.8%

Source: U.S. 2000 Census, HUD, Alabama Department of Labor.

The Alabama AAs are predominantly rural. Leading industries include regional medical facilities, light manufacturing, agriculture, timber, and education. Major employers include Wal-Mart Corporation, Auburn University and the Southeast Alabama Medical Center, as well as the school systems for both counties. Competition to provide financial services within these AAs remains strong. AB&T's major competitors include five larger, regional, commercial banks in both AAs.

For Alabama, the majority of AB&T’s mortgage loan originations were generated within the Auburn AA. The following table presents the Institution’s overall mortgage lending activity during the review period separated by Alabama AA:

Assessment Area	Originations
Auburn MSA	32/ 59.3%
Dothan MSA	22/ 40.7%
Totals	54/100.0%

In addition, the bank’s deposits in Alabama, as of December 31, 2011, were dispersed within the AAs as detailed below:

Assessment Area	Deposits (000’s)
Auburn MSA	18.9/ 88.3%
Dothan MSA	2.5/ 11.7%
Totals	21.4/100.0%

As noted above, the Dothan AA contains a small percentage of the bank’s overall deposit base and loan volume. The Dothan branch was closed in March 2011. As such, an analysis of the bank’s performance for this AA was considered insignificant and less meaningful.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes within the Auburn AA

AB&T’s level of lending to borrowers of different incomes and to businesses of different sizes within this AA is reasonable and meets the standards for satisfactory performance. The bank’s penetration of loans is reasonable among individuals of different income levels. Although the percentage of lending to low-income families is below the demographic benchmark, this AA’s family poverty rate at 11.1 percent represents a mitigating factor. The level of lending to moderate-income families is excellent compared to the demographic benchmark.

Table 2 - Borrower Income Distribution of Residential Real Estate Loans within the Auburn AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Residential	22.6%	6.7%	16.2%	16.7%	21.7%	10.0%	39.5%	66.6%

Source: U.S. Census Data and HMDA analysis.

However, lending to businesses of different sizes within this AA is excellent. The number of loans made to businesses with revenues less than \$1 million is higher than the percentage for the number of small businesses within this AA. Although the dollar volume of loans originated is more evenly distributed among small and large businesses, the examiner notes that one loan to a large business was very large and distorted these statistics. Therefore the overall the level of performance based upon dollar amount is excellent.

Table 2A - Income Distribution of Loans to Businesses within the Auburn AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	69.0%	2.7%	28.3%	100%
% of Bank Loans in AA by #	87.5%	12.5%	0%	100%
% of Bank Loans in AA by \$	56.5%	43.5%	0%	100%

Source: Loan sample; Dunn and Bradstreet data.

Geographic Distribution of Loans within the Auburn AA

AB&T’s overall geographic distribution of loans within this AA reflects an excellent dispersion and exceeds the standards for satisfactory performance. Although the bank did not originate any loans within any of the three low-income CTs, the bank’s the level of lending within the moderate-income CTs is significantly higher than the percentage of OOHUs within these CTs. The lack of lending within the low-income CTs is mitigated by the low percentage of OOHUs with these tracts and the low number of low-income tracts.

Table 3 - Geographic Distribution of Residential Real Estate Loans within the Auburn AA								
CT Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Residential	1.7%	0.0%	15.2%	21.9%	63.5%	50.0%	19.6%	28.1%

Source: U.S. Census Data and HMDA Data

Although no loans were made in any of this AA’s three low-income CTs, overall the percentage of loans granted to businesses and farms within the low-and moderate-income geographies is excellent and exceeds the percentage of businesses and farms within these CTs. The bank’s geographic distribution of business and farm loans reflects an excellent dispersion throughout the CTs within this AA.

Table 3A - Geographic Distribution of Loans to Businesses/Farms within the Auburn AA								
CT Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Bus/Farms	% of Number of Loans	% of AA Bus/Farms	% of Number of Loans	% of AA Bus/Farms	% of Number of Loans	% of AA Bus/Farms	% of Number of Loans
Commercial	6.8%	0.0%	11.9%	25.0%	63.7%	50.0%	17.6%	25.0%

Source: U.S. Census Data and Loan Sample

Responses to Complaints

There were no CRA-related complaints received by the bank or the OCC during the evaluation period.

Fair Lending or Other Illegal Credit Practices Review

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