

# **Public Disclosure**

**August 16, 1999**

## **Community Reinvestment Act Performance Evaluation**

**Fidelity National Bank  
Charter Number: 16275**

**3500 Holcomb Bridge Road  
Norcross, GA 30092**

**Office of the Comptroller of the Currency**

**Georgia Field Office  
1117 Perimeter Center West, Suite W401  
Atlanta, GA 30338-5417**

**NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

## Table of Contents

<b>General Information</b> .....	3
<b>Definitions and Common Abbreviations</b> .....	4-5
<b>Overall CRA Rating</b> .....	6
<b>Description of Institution</b> .....	7
<b>Scope of Evaluation</b> .....	8
<b>Fair Lending Review</b> .....	8
<b>Conclusions with Respect to Performance Tests</b>	
Lending Test.....	9-11
Investment Test.....	11
Service Test.....	12-14
<b>Appendix A: Scope of Evaluation</b> .....	15
<b>Appendix B: Market Profiles for Areas Receiving Full-Scope Reviews</b> .....	16
<b>Appendix C: Tables of Performance Data</b> .....	17-26

## 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 CRA performance of **Fidelity National Bank** prepared by the **Office of the Comptroller of the Currency (OCC)** the institution's supervisory agency, as of **August 16, 1999**. 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 CFR Part*

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

**Community Development (CD)** Affordable 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.

**Full-Scope Review** Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

**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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

**Limited-Scope 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, branch distribution).

**Low-Income**- Income levels that are less than 50% of the median family income.

**Median Family Income (MFI)** The median income determined by the United States 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 Statistical Area (MSA)** Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** -Income levels that are at least 80% and less than 120% of the MFI.

**Moderate-Income** -Income levels that are at least 50% and less than 80% of the MFI.

**Small Business Loans** Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

**Tier 1 Capital**- The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income**- Income levels that are 120% or more of the MFI.

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **“SATISFACTORY.”**

The following table indicates the performance level of **FIDELITY NATIONAL BANK (FIDELITY)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Fidelity National Bank Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	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:

- Fidelity has an adequate level and volume of lending within its assessment areas (AA.) The geographic distribution of its loans to low- and-moderate (LMI) tracts is poor. This is particularly true of HMDA lending. Small business lending in LMI tracts is adequate. The bank’s level of HMDA lending to LMI borrowers is good. This is particularly true for moderate income borrowers, where the bank’s level of lending is good. The bank’s total lending to small businesses (regardless of location) is good. Fidelity has granted an excellent level of community development (CD) loans. The bank has aggressively pursued CD lending as a method to enhance their CRA performance. The bank has only recently implemented a flexible lending program.
- Fidelity has an adequate level of CD investments. Fidelity has significantly increased their level of CD investments from \$5,990 at the last evaluation to the current level of \$1.6 million. The bank’s level of CD investments reflects responsiveness to the needs and opportunities within its AA, specifically to the need for affordable housing. The bank’s level of investments are also commensurate with the bank’s size and its condition as a bank recently operating under a capital directive (see the Description of the Institution below.)
- Fidelity’s branch locations are reasonably accessible to geographies and individuals of

different income levels. Additionally, the bank provides a good level of CD services.

## **Description of Institution**

Fidelity, an intrastate bank, was initially organized in 1974 and is a wholly owned subsidiary of Fidelity National Corporation (FNC) a one bank holding company. As of June 30, 1999, Fidelity had total assets of \$783 million and a loan portfolio of \$603 million. The largest segment of the loan portfolio (\$327 million or 54%) is composed of consumer loans, many of which are generated on a national basis via an indirect automobile lending program. Credit card loans accounted for 16% of loans. Other major segments of the portfolio include real estate loans (28%) and commercial loans or loans secured by nonfarm nonresidential real estate (18%). The bank's loan to deposit ratio is 89%.

Fidelity has a wholly-owned subsidiary, Fidelity National Mortgage Corporation (FNMC). Fidelity operates nineteen full service branches (all of which have attached deposit-taking ATMs) and eighteen freestanding ATMs, one of which is a deposit taking facility. The bank operates in five of the twenty counties contained in the Atlanta MSA. Fidelity's performance under the CRA was last evaluated as of September 7, 1998 when it was rated Needs to Improve.

Fidelity entered into a Formal Agreement with the Office of the Comptroller of the Currency (OCC) on November 14, 1996 which required the bank to, among other things, achieve and maintain specified higher capital levels. As a result, Fidelity was subject to restrictions on its ability to pay dividends and management fees, as well as restrictions on asset growth and expansion. Bank management was not able to aggressively pursue new or innovative CRA products but instead had to focus their attention on their core business. On December 1, 1998, the OCC removed the formal agreement between Fidelity and the OCC. Fidelity's condition was a major factor in understanding the banks' performance context over a large portion of the evaluation period. At the least, management's attention and efforts were focused on improving the bank's condition rather than meeting the lending, investment, and service needs of their community. Tier one capital is now adequate and as of June 30, 1999 totaled \$52 million. Other than the restrictive impact of the bank's condition and the limitations of regulatory actions described above, there were no other factors impeding the bank's ability to help meet the credit needs in its AA.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The last Community Reinvestment Act performance Evaluation of the bank was dated September 7, 1998 and focused on loan performance through June 30, 1998. At this examination we focused on loan performance for the calendar year 1998, except for CD loans which were reviewed from the date of the last evaluation through August 16, 1999. Loan products reviewed included small business and home mortgage lending by the bank. The bank did not grant any small farm loans during the evaluation period. At the bank's request, we included HMDA lending performed by FNMC, if in the bank's AA, in our analysis. For the Investment and Service Tests we included any investments, products or services from September 7, 1998 through August 16, 1999.

### **Data Integrity**

Files for a representative sample of the bank's HMDA and small business loans (granted during calendar year 1998) were reviewed for accuracy and compared to reported information. Additionally, we reviewed the accuracy of information provided by the bank for CD investments and services. There were no significant errors or concerns noted.

### **Selection of Areas for Full Scope Reviews**

The bank has one AA where we performed a full scope review.

### **Ratings**

Similar weight was given to the bank's HMDA and small business lending, as both are considered key parts of the bank's operations. In the area of HMDA lending, the greatest weight was given to home purchase lending because of its volume coupled with the direct impact on new affordable housing loans. Even though consumer lending constitutes a large portion of the bank's outstanding loan portfolio, it was not included in this analysis because much of it is performed on a national level. CD lending was a factor in determining the rating for the Lending Test and enhanced the bank's performance under that Test.

### **Fair Lending Review**

The fair lending review included an analysis of home purchase loans granted from June 30, 1997 to June 30, 1998. The analysis focused on the application decision process and used race as the prohibited basis. There were no violations of the substantive provisions of the antidiscrimination

laws and regulations identified.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

#### **Conclusions**

The bank's performance under the Lending Test is rated Low Satisfactory. Geographic distribution of home mortgage loans is poor. There were no conspicuous gaps in the bank's lending patterns. Overall lending to LMI applicants is good. The bank's small business lending in LMI tracts is adequate and overall small business lending is good. The level of CD lending is excellent and enhances the bank's performance. The positive aspects of the bank's CD lending and lending to LMI applicants offsets the negative performance in geographic distribution.

#### **Lending Activity**

The bank has an adequate level of lending activity in its assessment area. The bank's market share in small business and HMDA lending at approximately 1% is commensurate with its deposit market share at approximately 1%. As shown in Table 1 in the Appendix section of this evaluation, the bank and FNMC granted approximately \$87 million in home mortgage, small business, and CD loans, within the bank's assessment area (AA), during calendar year 1998. Of the bank's total HMDA and small business lending, 91% and 84% respectively, was in its AA.

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

##### ***Home Mortgage Loans***

Home mortgage lending by geography is poor. As shown in Tables 2, 3 and 4 in Appendix C, the bank has a poor level of lending in low income census tracts when compared to the proportion of owner occupied houses. The bank's lending in moderate income tracts, however, is adequate. This is particularly true for home improvement lending where the bank's lending exceeds the proportional share of owner occupied homes in those tracts and is excellent (however these loans do represent a small portion of the bank's total home mortgage lending.)

##### ***Small Business Loans***

Small business lending by geography is adequate. As shown in Table 5 in Appendix C, the bank's level of small business lending in both low and moderate income tracts is less than the

demographic comparable (% of businesses operating in those tracts). However, the bank's market share of small business loans in LMI tracts is very similar to its overall market share and is good.

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

### ***Home Mortgage Loans***

Home mortgage lending by borrower income level is good. As shown in Tables 7, 8 and nine in Appendix C, the bank has an adequate level of lending for all mortgage products to low income borrowers when compared to percentage of low income borrowers. The bank's level of lending to moderate income borrowers is good, particularly for home purchase lending which is excellent, again when compared to the percentage of moderate income borrowers. In terms of market share, the bank's market share of home purchase loans to low income borrowers is excellent as it exceeds their overall market share. In all other products the bank's market share of lending to LMI borrowers approximates the bank's overall market share and is good.

### ***Small Business Loans***

As shown in Table 10 in Appendix C, the bank has a good record of lending to businesses with revenues less than \$1 million. Although less than the demographics, the bank's performance is excellent compared to the overall market's performance. The bank's percentage of loans to small businesses exceeds the market's percentage of loans to small businesses.

## **Community Development Lending**

The bank has granted an excellent level of CD loans. During the evaluation period the bank granted six CD loans totaling \$5.3 million in its AA. The largest CD loan at \$4 million is to construct a mixed use facility in the heart of a group of low income tracts in downtown Atlanta, which will help revitalize the area and provide numerous small businesses the opportunity for trade. The loan will be used to build and renovate an inner city mall (an urban flea market) and also will fund the construction of forty-five loft apartments of which 20% will be affordable housing. The mall does and will employ a significant number of LMI individuals and will provide much needed shopping alternatives to residents of these low income tracts.

The next largest loan at \$1.1 million, was to construct a convenience store which is located in a moderate income census tract in very close proximity with the border of a low income tract. The immediate area where the store is located has experienced numerous retail business closings. This loan qualifies as a CD loan because it finances a business which will help stabilize a deteriorating and distressed area. The store will provide needed jobs to LMI individuals as well as needed shopping alternatives to residents of LMI tracts. The remaining loans were to fund the construction of affordable housing units.

## **Product Innovation and Flexibility**

The bank did not have any proprietary lending programs, during 1998, which would be considered innovative or flexible. The bank has since developed a program which is flexible because it allows lower credit scores, higher debt service coverage and LTV ratios. The program is the Community Home Assistance Program or “CHAMPS” and was implemented during 1999. This program permits 100% Loan-to-Value (1st mortgage of 95% and 2nd mortgage of 5%.) The maximum front-end ratio is 35% and back-end ratio is 45%. Standard FHA underwriting guidelines apply with certain expanded criteria. No loans were made under the program during the evaluation period.

## **INVESTMENT TEST**

### **Conclusions**

The bank’s performance under the Investment Test is rated low satisfactory. As shown in Table 12 in the Appendix, the bank has granted \$1.6 million in qualified community development investments, which is an adequate level given the bank’s size and capacity. The bank’s capacity to invest in CD investments was negatively impacted by the existence of the Formal Agreement and the bank’s overall financial condition. The majority of the bank’s investments (96%) are Fannie Mae Mortgage Backed Securities. All of the underlying mortgages securing the investments are to LMI borrowers purchasing residential property within the bank’s AA, which responds to one of the more significant needs in the AA.

The bank has made a contribution totaling \$30,000 to the Green Forest CDC Home buyers program. The contribution was used to fund the training program and for operational costs. The CDC was formed by an alliance of six churches serving largely LMI tracts. The CDC educates and assists (including credit counseling) LMI individuals in purchasing affordable housing. Affordable housing is one of the major needs in the AA and there are sufficient opportunities existing to address these needs. The bank’s investments are indicative of the nature and types of CD investment opportunities existing in the bank’s AA.

## **SERVICE TEST**

### **Conclusions**

The bank’s performance under the Service Test is rated “low satisfactory.” While the bank does not have any branches or deposit taking ATMs in low income tracts, the bank’s branches are

accessible to geographies and individuals of different income levels in its AA. The bank has a good level of CD services.

### **Retail Banking Services**

As shown in Table 13 in Appendix C, the bank does not have any branches or deposit-taking ATMs located in low income census tracts. However, the bank's branches and deposit-taking ATMs are in close proximity to the sixteen low income tracts in the bank's AA. Nine of the low income tracts are relatively small in size and are located in the heart of downtown Atlanta. Fidelity has a branch in a moderate income tract which is surrounded by the low income tracts. Of the sixteen low income tracts, six are contiguous to tracts having Fidelity branches and another eight are contiguous to tracts which border tracts having Fidelity branches. Only two of the low income tracts are not in close proximity to a Fidelity branch. The bank has not closed or opened any branches since the last evaluation. The bank has closed one cash-dispensing ATM located in a middle income census tract and has opened seven cash dispensing ATMs. Two (29%) of the new ATMs are located in moderate income tracts.

The bank has developed several alternative delivery systems:

- In addition to deposit-taking ATMs, the bank operates seventeen cash dispensing (non deposit-taking) ATMs. None of these are located in low income tracts, however, 18% are located in moderate income tracts which is an excellent level compared to the demographics. These ATMs, while not providing a full range of services, do allow bank customers in LMI tracts to have ready access to their funds on deposit.
- The bank has implemented a small business lending initiative that includes a concentrated solicitation program. The solicitation focuses on small businesses located in LMI areas. Since its inception in early 1999, the bank has contacted 930 small businesses. Although the bank did not track results, this program demonstrates the bank's commitment to serve the needs of small businesses located in LMI tracts.
- The bank now tracks new accounts opened through its telephone banking department. Since June of 1998 sixteen of the 242 new accounts were to customers residing in LMI tracts. These are accounts which otherwise may not have been opened.

### **Community Development Services**

The bank has a good level of community development services, both in terms of the number of services provided, the number of bank employees involved and the number of LMI individuals or small businesses served. Some of the more notable examples of the services provided by the bank are:

- Bank officers attended the One Stop Capital Shop Expo for Small Businesses and discussed the bank's participation as a Small Business Administration (SBA) lender and the products available at the bank.
- Bank officers participated in both the Greater Atlanta Small Business Exposition and the Dekalb County Small Business Exposition. Bank services and credit opportunities were discussed with existing and prospective small business owners.
- The bank has adopted two schools located in LMI tracts in the Partners in Education program. The bank donates the use of banking facilities for meetings, sponsors a number of activities at the school, and participates in Career Day where a presentation is made on basic lending information and how to obtain credit.
- The bank has conducted ten First Time Home Buyers Seminars with an average of 10-15 participants.
- A bank officer provided technical advice and helped the Green Forest CDC apply for and obtain a \$500,000 loan from the Federal Home Loan Bank. The proceeds of the loan were used to renovate a 161-unit apartment complex that is rented to LMI individuals (the maximum income for a resident is 65% of the MSA median income.) The bank officer is responsible for monitoring the residency requirements and preparing annual certifications. If the complex meets the LMI requirements for fifteen years, the loan will be forgiven.
- A bank officer sponsored the application from the Senior Connections (more than 70% participating are LMI) to the Federal Home Loan Bank which resulted in the group receiving the \$50,000 Partnership Excellence Award. The bank is very active with the Senior Connections. As an example, more than fifty bank employees participate in the Meals on Wheels program. When visiting the elderly, bank officers discuss available bank products and services.
- A bank officer met with the Historic District Development Corporation which renovates and sells houses in a low income census tract. The bank officer discussed the bank's CHAMPS lending program with a group of existing and potential home owners.
- A bank officer spoke with the Dekalb Leadership Institute (75% of members are from low income tracts) concerning the pitfalls of small business lending and how to prepare a sound business plan. There were approximately thirty attendees.
- A bank officer met with the Sweet Auburn Business and Improvement Association (low income census tract) to discuss small business lending opportunities at the bank. There were approximately eleven attendees.

- A bank officer has provided technical assistance to the Neighborhood Fund portion of the Community Foundation for Greater Atlanta, Inc. (targets LMI areas)

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test: (January 1, 1998 to December 31, 1998) Investment Test: (September 7, 1998 to August 18, 1999) Service Test: (September 7, 1998 to August 18, 1999)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Fidelity National Bank (Fidelity) Atlanta, Georgia	HMDA, Small Business, CD loans, investments and services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Fidelity National Mortgage Company (FNMC)	Wholly owned sub of the bank	HMDA lending if in the bank’s assessment area
List of Assessment Areas and Type of Examination		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Atlanta MSA #520	Full-Scope	All of DeKalb County and portions of four (Cobb, Gwinnett, Fulton and Clayton) of the twenty counties comprising the MSA.

## Appendix B: Market Profile

### Atlanta MSA (five counties making up the bank’s Assessment Area)

Demographic Information for Full-Scope Area: (Portion of Atlanta MSA in Fidelity's AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	303	5%	13%	43%	38%	1%
Population by Geography	1,952,793	3%	11%	46%	40%	-
Owner-Occupied Housing by Geography	463,041	1%	8%	43%	48%	-
Businesses by Geography	98,724	3%	10%	43%	44%	-
Farms by Geography	1,575	2%	7%	46%	45%	-
Family Distribution by Income Level	514,138	14%	17%	24%	45%	-
Distribution of Low- and Moderate-Income Families throughout AA Geographies	159,883	5%	19%	53%	23%	-
Median Family Income	= \$48,347	Median Housing Value				= \$111,404
HUD Adjusted Median Family Income for 1998	= \$54,700	Unemployment Rate (June, 1999)				= 3.3%
Households Below the Poverty Level	= 7%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

The bank is unique in the Atlanta MSA. Competitors are dissimilar and either are branches of very large banks or are much smaller community banks. The bank’s AA consists of all or portions of five of the twenty counties comprising the Atlanta MSA. The five counties in the bank’s AA are the most heavily populated counties in the MSA and the bank’s AA represents 66% of the total MSA population. The bank designated only the portion of the MSA it could reasonably serve as its AA. The delineation does not reflect illegal discrimination and does not arbitrarily exclude LMI areas.

We relied somewhat on the data from the last evaluation and examiner knowledge of the AA to understand community credit needs and opportunities, as well as for developing the bank’s performance context. We reviewed recent community contact forms prepared by federal financial regulators. We also performed a contact during this evaluation to validate opportunities and needs within the bank’s AA. The contact is an official with a county CD department. The department’s primary function is to provide viable urban community living for LMI families, primarily in distressed areas. The primary needs and opportunities within the AA are considered affordable housing (including multi-family) for LMI individuals, small business loans, and

revitalization of various distressed areas.

## **Appendix C: Tables of Performance Data**

---

### **Content of Standardized Tables**

The tables cover the entire CRA evaluation period. 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; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** Compares the percentage distribution of the number of loans originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations**  
- See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations**  
- See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** The percentage distribution of the number of small loans (< \$1 million) to businesses originated 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 rank and market share information based

on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Farm Loan Originations** The percentage distribution of the number of small loans (< \$500,000) to farms originated 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 rank and market share information based on the most recent aggregate market data available.

**Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

**Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations**  
See Table 7.

**Table 9. Borrower Distribution of HMDA Refinance Loan Originations** See Table 7.

**Table 10. Borrower Distribution of Small Business Loan Originations** Compares the percentage distribution of the number of small loans (< \$1 million) originated 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. The table also presents the percentage distribution of the number of loans originated 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 11. Borrower Distribution of Small Farm Loan Originations** Compares the percentage distribution of the number of small loans (< \$500 thousand) originated 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. The table also presents the percentage distribution of the number of loans originated 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 12. Qualified Investments** Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

**Table 13. Distribution of Branch and ATM Delivery System** Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

**Table 1. Lending Volume**

LENDING VOLUME												
		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998								
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Atlanta MSA	100%	479	\$66,361	173	\$18,836	0	\$0	13	\$2,220	665	\$87,417	100%
Full Scope:												

**Table 2. Geographic Distribution of Home Purchase Loan Originations**

Geographic Distribution: HOME PURCHASE															
		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998											
MSA/Assessment Area:	Low-Income Geographies	Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*			Market Share by Geography*			Total Home Purchase Loans	
		% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	Overall	Low	Mod	Upp	#	% of Total
Atlanta MSA	1%	8%	5%	43%	43%	48%	52%	78	<1	0	<1	<1	122	100%	
Full Scope:															

(\*) Based on 1997 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loan Originations**

Geographic Distribution: HOME IMPROVEMENT		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998		Overall Market Rank*		Market Share by Geography*			Total Home Improvement Loans				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mid	Upp	#	% of Total	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans							
Atlanta MSA	1%	0%	8%	10%	43%	30%	48%	60%	45	< 1	0	< 1	< 1	10	100%

(\* ) Based on 1997 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations**

Geographic Distribution: HOME MORTGAGE REFINANCE		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998		Overall Market Rank*		Market Share by Geography*			Total Home Mortgage Refinance Loans			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mid	Upp	#	% of Total
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans						
Atlanta MSA	1%	< 1%	8%	1%	43%	38%	48%	61%	107	< 1	< 1	< 1	347	100%

(\* ) Based on 1997 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Business Loan Originations**

Geographic Distribution: SMALL BUSINESS State: Georgia Evaluation Period: January 1, 1998 TO December 31, 1998															
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#
Atlanta MSA	3%	2%	10%	6%	43%	28%	44%	64%	17	1	1	1	2	173	100%
Full Scope:															

(\* ) Based on 1997 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Farm Loan Originations**

Geographic Distribution: SMALL FARM State: Georgia Evaluation Period: January 1, 1998 TO December 31, 1998															
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#
Atlanta MSA	2%	0%	7%	0%	46%	0%	45%	0%	0	0	0	0	0	0	100%
Full Scope:															

(\* ) Based on 1997 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loan Originations**

Borrower Distribution: HMDA HOME PURCHASE		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998												
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**				Total Home Purchase Loans		
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Atlanta MSA	14%	8%	17%	20%	24%	26%	45%	46%	78	< 1	1	< 1	< 1	< 1	122	100%

(\*) As a percentage of loans with borrower income information available. No information was available for 5% of loans originated by Fidelity.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loan Originations**

Borrower Distribution: HOME IMPROVEMENT		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998												
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**				Total Home Improvement Loans		
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Atlanta MSA	14%	10%	17%	10%	24%	40%	45%	40%	45	< 1	0	< 1	< 1	< 1	10	100%

(\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by Fidelity.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations**

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998		Total Home Mortgage Refinance Loans								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**						
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Upp	#	% of Total	
Atlanta MSA	14%	4%	17%	13%	24%	29%	45%	54%	107	<1	<1	<1	347	100%
Full Scope:														

(\*) As a percentage of loans with borrower income information available. No information was available for 4% of loans originated by Fidelity.  
 (\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Business Loan Originations**

Borrower Distribution: SMALL BUSINESS		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998		Total Small Business Loans					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		Market Share****		Avg Loan Size				
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	Rev \$1 million or less		#			
Atlanta MSA	88%	55%	46%	72%	15%	13%	1	173	100%	\$109	
Full Scope:											

(\*) As a percentage of businesses with known revenues.  
 (\*\*) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by Fidelity.  
 (\*\*\*) The market consists of all other Small Business reporters in Fidelity's assessment area and is based on 1997 Aggregate Small Business Data only.  
 (\*\*\*\*) Based on 1997 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Farm Loan Originations**

Borrower Distribution: SMALL FARM		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998			
Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size		Market Share****		Total Small Farm Loans	
% of Farms*	% BANK Loans**	% Market Loans***	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	Avg Loan Size
97%	NA	87%	0	0	0	0	\$0
Full Scope:							
Atlanta MSA							

(\*) As a percentage of farms with known revenues.  
 (\*\*) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by Fidelity.  
 (\*\*\*) The market consists of all other Small Farm reporters in Fidelity's assessment area and is based on 1997 Aggregate Small Farm Data only.  
 (\*\*\*\*) Based on 1997 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998			
MSA/Assessment Areas:		Prior Period Investments*		Current Period Investments		Total Investments	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
Full Scope:							
Atlanta MSA		0	\$0	20	1,631	20	\$1,631

(\*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.  
 (\*\*) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

**Table 13. Distribution of Branch and ATM Delivery Systems**

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM										State: Georgia		Evaluation Period: January 1, 1998 TO December 31, 1998			
MSA/Assessment Area:	Deposits		Branches			ATMs			Population						
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies			# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies			% of the Population Each Geograp			
				Low	Mod	Upp			Low	Mod	Upp	Low	Mod	Upp	
Full Scope:															
Atlanta MSA	100%	19	100%	0%	5%	26%	69%	20	100%	0%	10%	25%	65%	3%	11%