

# Community Reinvestment Act (CRA) Public File



# Public Disclosure

Community Reinvestment Act Performance Evaluation

# **PUBLIC DISCLOSURE**

COPY

November 4, 2019

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Claxton Bank  
Certificate Number: 15826

121 West Main Street  
Claxton, Georgia 30417

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Atlanta Regional Office

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Atlanta, Georgia 30309-3849

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.

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**. An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area(s), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. The Claxton Bank's satisfactory Community Reinvestment Performance (CRA) under the Lending Test supports this conclusion. Examiners did not identify any evidence of discriminatory or other illegal credit practices. The following points summarize the bank's Lending Test performance:

- The loan-to-deposit ratio is reasonable.
- The bank originated a majority of its loans in the assessment area.
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects a reasonable penetration of loans among businesses of different sizes and individuals of different income levels.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

## SCOPE OF EVALUATION

### General Information

This evaluation covers the period from the previous CRA evaluation dated September 30, 2013 to the current evaluation dated November 4, 2019. Examiners used the Interagency Small Institution Examination Procedures to evaluate The Claxton Bank's CRA performance. Effective January 1, 2019, small institutions are banks with assets of less than \$1.284 billion as of December 31 of both of the prior two calendar years. The asset threshold level adjusts annually based on changes in the Consumer Price Index. As of December 31, 2017, and December 31, 2018, the bank's assets totaled \$128.0 million and \$121.1 million, respectively.

The Small Institution Examination Procedures evaluate the following criteria relative to the bank's lending activities:

- Loan-to-deposit ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile distribution
- Response to CRA-related complaints

The institution operates in one assessment area comprised of Evans and Tattnall Counties in Georgia.

### Loan Products Reviewed

The CRA regulation requires a review of a bank's lending performance with respect to small business, home mortgage, and small farm loans, if significant. These categories have specific definitions detailed below. This evaluation does not include any lending activity by affiliates as the bank has no lending affiliates.

The June 30, 2019, Consolidated Reports of Condition and Income (Call Report) was used to determine the bank's portfolio mix. Based on a review of the Call Report, the bank's major product line was commercial loans at 39.0 percent followed by closed-end, residential loans at 17.0 percent of total loans. Therefore, small business lending will receive more weight than residential loans in deriving overall conclusions with respect to the bank's CRA performance. Small farm loans were not reviewed as farm loans only comprised 5.9 percent of the outstanding portfolio.

For CRA purposes, a small business loan is defined as a loan included in "loans to small businesses" as defined in the Call Report. These loans are either secured by non-farm, non-residential properties or are classified as commercial and industrial loans with loan origination amounts of \$1 million or less. In 2018, the bank originated 48 small business loans totaling \$8.8 million. From these loans, a sample was taken to evaluate the bank's CRA performance. D&B data for 2018 provided a standard of comparison for the small business loans reviewed.

The bank is not subject to the data collection and reporting requirements of the Home Mortgage Disclosure Act. As a result, a review of closed-end, residential mortgage loans as reported on the bank's loan trial was performed. In 2018, the universe of home mortgage loans originated was 31 loans totaling \$3.6 million. All of these loans were used to evaluate the bank's CRA performance. Census data on owner-occupied housing units provided a standard of comparison for the home mortgage loans reviewed. The table below further details the loan universe as well as the total of all loans reviewed for the Lending Test.

Loan Products 2018				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Small Business	48	8,764	31	5,917
Home Mortgage	31	3,578	31	3,578
<i>Source: Bank records</i>				

Examiners reviewed the number and dollar volume of loans. While the number and dollar volume of loans are presented, examiners emphasize performance by number, because it is a better indicator of the number of individuals and businesses served. The dollar amount is only addressed when materially different from the number percentages or if it is otherwise meaningful to the analysis.

## DESCRIPTION OF INSTITUTION

### **Background**

The Claxton Bank is headquartered in Claxton, Georgia, and operates in southeastern Georgia. The bank is wholly-owned by Southern Bankshares, Inc., Claxton, Georgia, a one-bank holding company. The bank received a Satisfactory rating at its previous FDIC CRA Performance Evaluation, dated September 30, 2013, based on Interagency Small Institution Examination Procedures.

### **Operations**

The bank operates three offices: two in Claxton and one in Bellville. All three offices are in Evans County, Georgia. No offices have opened or closed during the evaluation period.

The Claxton Bank offers a variety of loan products including commercial, agricultural, home mortgage, and consumer loans, primarily focusing on commercial lending. The bank also offers small dollar loans to meet the credit needs of its customers. These loans are in amounts under \$2,500. For the period from January 1, 2016 through September 30, 2019, the bank originated 160 loans totaling \$295,753. The bank offers a full range of consumer deposit products including checking, savings, money market, and certificates of deposit. Alternative banking services include internet and mobile banking, electronic bill pay, and three bank-owned automated teller machines (ATMs).

### **Ability and Capacity**

Economic conditions have impacted the bank's ability to meet credit needs. The assessment area has a very high percentage (23.4 percent) of families with incomes below the poverty level. These individuals are unlikely to qualify for home mortgage loans. Furthermore, there has been no growth in the number of owner-occupied housing units in the assessment area. The 2010 Census data showed there were 8,079 owner-occupied housing units in the assessment area, but the updated 2015 American Community Survey (ACS) data revealed a decline with 7,983 units at this evaluation.

Assets totaled approximately \$126.0 million as of June 30, 2019, and included total loans of \$82.3 million and securities totaling \$26.1 million. The loan portfolio is illustrated in the table on the following page.



<b>Loan Portfolio Distribution</b>		
<b>Loan Category</b>	<b>\$ (000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	15,361	18.7
Secured by Farmland	4,583	5.6
Secured by 1-4 Family Residential Properties (Open-end loans)	590	0.7
Secured by 1-4 Family Residential Properties (Closed-end loans)	14,006	17.0
Secured by Multifamily (5 or more) Residential Properties	13,049	15.8
Secured by Non-farm Non-residential Properties	29,059	35.3
<b>Total Real Estate Loans</b>	<b>76,648</b>	<b>93.1</b>
Agricultural Production and Other Loans to Farmers	211	0.3
Commercial and Industrial Loans	3,035	3.7
Consumer Loans	1,600	1.9
Obligations of States and Political Subdivisions in the United States	823	1.0
Other Loans	0	0.0
<b>Gross Loans</b>	<b>82,317</b>	<b>100.0</b>
Less: Unearned Income	(0.0)	(0.0)
<b>Total Loans and Leases</b>	<b>82,317</b>	<b>100.0</b>
<i>Source: June 30, 2019 Call Report.</i>		

## **DESCRIPTION OF ASSESSMENT AREA**

### **GENERAL INFORMATION**

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. The Claxton Bank designated all eight census tracts within Evans and Tattnall Counties as its assessment area. These counties are contiguous and located in non-metropolitan areas of southeastern Georgia. The assessment area has been delineated in accordance with the CRA technical requirements. In particular, it consists of whole census tracts that do not arbitrarily exclude low- or moderate-income census tracts and includes the census tracts where the bank's offices are located.

The assessment area has not changed since the previous evaluation. However, the income designation of the census tracts has changed due to updated census data. At the previous evaluation, 2010 Census data was used. For this evaluation, the 2015 ACS data was used. The 2010 Census data was updated by the ACS with data collected during the 2011-2015 survey. Databases were updated in 2017 to reflect the MSAs and Metropolitan Divisions, states, counties, census tracts, and income level indicators, population, and housing characteristics.

### **Economic and Demographic Data**

The assessment area includes the communities of Claxton, Bellville, Daisy, Glennville, and Hagan. The census tracts in the assessment area reflect the following income designations according to the 2015 ACS data:

- 0 low-income tracts,
- 1 moderate-income tract,
- 6 middle-income tracts, and
- 1 upper-income tract.

In 2018, all of the middle-income census tracts in the assessment area were distressed due to poverty. Furthermore, Evans and Tattnall Counties have several correctional facilities, which house 4,995 people or 13.8 percent of the assessment area's population. The table on the next page illustrates select demographic characteristics of the assessment area. The table notes the percentage of families below the poverty level at 23.4 percent, which is high.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	12.5	75.0	12.5	0.0
Population by Geography	36,116	0.0	20.7	68.5	10.8	0.0
Housing Units by Geography	14,525	0.0	11.2	73.4	15.4	0.0
Owner-Occupied Units by Geography	7,983	0.0	10.1	74.8	15.1	0.0
Occupied Rental Units by Geography	3,879	0.0	12.3	74.5	13.2	0.0
Vacant Units by Geography	2,663	0.0	13.0	67.7	19.3	0.0
Businesses by Geography	1,460	0.0	7.1	77.9	15.0	0.0
Farms by Geography	195	0.0	13.8	65.6	20.5	0.0
Family Distribution by Income Level	8,288	26.9	15.5	17.8	39.8	0.0
Household Distribution by Income Level	11,862	26.8	16.8	14.9	41.5	0.0
Median Family Income Non-MSAs – GA		\$45,816	Median Housing Value			\$88,726
			Median Gross Rent			\$576
			Families Below Poverty Level			23.4%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (* ) The NA category consists of geographies that have not been assigned an income classification.						

The Financial Institutions Examination Council (FFIEC) estimates the Median Family Income for the non-metropolitan areas in Georgia. The 2018 level of \$48,900 is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income categories are presented in the following table.

GA Non-Metropolitan Median Family Income Ranges (99999)				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2018 (\$48,900)	<\$24,450	\$24,450 to <\$39,120	\$39,120 to <\$58,680	≥\$58,680
Source: FFIEC				

There are 14,525 housing units. Of these units, 55.0 percent are owner-occupied, 26.7 percent are occupied rental units, and 18.3 percent are vacant. The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units.

According to 2018 D&B data, there were 1,460 businesses. The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenue level (GARs). GARs for these businesses were as follows:

- 80.0 percent had \$1.0 million or less,
- 5.3 percent had more than \$1.0 million, and
- 14.7 percent had unknown revenues.

Per 2018 D&B data, service industries represented the largest portion of businesses and farms in the assessment area at 33.8 percent; followed by non-classifiable establishments (14.1 percent), and retail trade (12.1 percent). In addition, 63.3 percent of area businesses had four or fewer employees, and 87.1 percent operated from a single location. Major employers in Evans County include Claxton Poultry (4,000 employees); Evans Public Schools; and The Department of Corrections. Major employers in Tattnall County include the Georgia Department of Corrections (1,400 employees), Rotary Corporation (450 employees), and Duramatic (125 employees).

Data obtained from the Bureau of Labor Statistics indicates the annual unemployment rate for 2018 was 3.7 percent for Evans County and 4.2 percent for Tattnall County. Evans County had a lower unemployment rate than the State of Georgia and the United States, which both had a 3.9 percent rate.

### **Competition**

According to the FDIC's June 2019 Deposit Market Share data, five FDIC-insured financial institutions operated 14 full-service branches within the assessment area. Of these institutions, The Claxton Bank ranked third with a 21.9 percent deposit market share. The leaders in deposit market share included the following: Glennville Bank; South Georgia Bank; and The Claxton Bank. These leading institutions collectively accounted for 82.9 percent of the total market share of deposits. The bank also faces competition from credit unions and investment firms, which are not included in the market share data.

### **Community Contact**

While preparing CRA evaluations, examiners often contact community representatives to gain insight regarding the credit needs and economic conditions of a bank's assessment area. A contact familiar with the economic conditions in Evans County reported that there are no unmet credit needs in the assessment area.

### **Credit and Community Needs**

Considering information from demographic and economic data and discussions with management, examiners determined that affordable housing represents the primary credit needs for the assessment area. The relatively high number of low- and moderate-income families (26.9 percent and 15.5 percent) and households (26.8 percent and 16.8 percent), respectively, indicates a continued need for affordable housing. This need is further magnified by the elevated levels of families and households living below the poverty level at 23.4 percent and 27.0 percent, respectively. These factors could preclude low- and moderate-income individuals from qualifying for a home loan, even when offered with special terms. The high median age of housing stock (33 years) also indicates the potential need for home renovation loans.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

The Claxton Bank demonstrated satisfactory performance under the Lending Test. Satisfactory performance under the Geographic Distribution and Borrower Profile criteria support this conclusion.

### Loan-to-Deposit Ratio (LTDR)

The LTDR is reasonable given the bank's size and assessment area credit needs. The bank's LTDR, calculated from Call Report data, averaged 69.9 percent over the past 24 calendar quarters from September 30, 2013 to June 30, 2019. The ratio ranged from a low of 64.9 percent as of March 31, 2018 to a high of 73.9 percent as of December 31, 2016. The ratio fluctuated over the evaluation period with no trends noted. The Claxton Bank maintained a ratio in line with those of comparable institutions as shown in the following table. Examiners selected comparable institutions based on their asset size, geographic location (non-metropolitan areas), and lending focus.

Loan-to-Deposit Ratio Comparison		
Institution	Total Assets \$(000s)	Average LTDR (%)
The Claxton Bank	126,014	69.9
Peoples Bank, Lyons, GA	96,425	80.4
First Southern Bank, Waycross, GA	121,183	72.1
Farmers and Merchants Bank, Sylvania, GA	118,639	47.3
Mount Vernon Bank, Mount Vernon, GA	131,153	57.0
South Georgia Bank, Glennville, GA	161,867	71.1
Waycross Bank & Trust, Waycross, GA	170,230	63.0
Source: Call Report data		

### Assessment Area Concentration

The bank originated a majority of small business and home mortgage loans, by number, and by dollar volume, for small business loans within the assessment area. The majority of home mortgage loans, by dollar volume, were originated outside the assessment area. Most of these loans were to businesses for investment purposes and were for larger amounts. A breakdown by each product line is shown in the following table.

Lending Inside and Outside the Assessment Area										
Loan Category	Number of Loans					Dollar Amount of Loans \$(000s)				
	Inside Assessment Area		Outside Assessment Area		Total #	Inside Assessment Area		Outside Assessment Area		Total \$(000s)
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Small Business	25	80.6	6	19.4	31	3,625	61.3	2,292	38.7	5,917
Home Mortgage	22	71.0	9	29.0	31	1,502	42.0	2,076	58.0	3,578
<i>Source: Bank records</i>										

### **Geographic Distribution**

Overall, the geographic distribution of loans reflects generally reasonable dispersion throughout the assessment area. The analysis includes only loans originated within the assessment area. There are no low-income census tracts in the assessment area.

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

The geographic distribution of small business loans reflects a generally reasonable penetration throughout the assessment area given demographic data and competition. The bank did not extend any small business loans in the one moderate-income tract. However, the moderate-income census tract is located in Tattnall County. The bank has no office locations in Tattnall County, but two other banks (Glennville Bank and South Georgia Bank) operate five offices in the county.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	7.1	0	0.0	0	0.0
Middle	77.9	25	100.0	3,625	100.0
Upper	15.0	0	0.0	0	0.0
Not Available	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>3,625</b>	<b>100.0</b>
<i>Source: 2018 D&amp;B Data; 1/1/2018 - 12/31/2018 Bank Data</i>					

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

The geographic distribution of home mortgage loans reflects a generally reasonable penetration throughout the assessment area given demographic data and competition. The bank did not extend any home mortgage loans in the moderate-income tract. As addressed earlier, the bank does not have an office in the moderate-income census tract located in Tattnall County, and other financial institutions operate five offices in the county. Please refer to the table on the next page for additional details.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Moderate	10.1	0	0.0	0	0.0
Middle	74.8	19	86.4	1,390	92.5
Upper	15.1	3	13.6	112	7.5
Not Available	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>1,502</b>	<b>100.0</b>
<i>Source: 2015 ACS Census, 1/1/2018 - 12/31/2018 Bank Data</i>					

### **Borrower Profile**

Overall, the distribution of loans reflects a reasonable penetration among businesses of different sizes and borrowers of different income levels. The analysis includes only loans originated within the assessment area.

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

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. As shown in the table on the following page, the percentage of loans to businesses with gross annual revenues of \$1 million dollars or less by number (56.0 percent) is below the percentage of such businesses in the assessment area at 80.0 percent. Bank management explained that there are several factors affecting the bank's lending to these businesses. First, there has been no growth in the number of businesses in the assessment area. According to the 2013 D&B data used at the last evaluation for comparison purposes, there were 2,093 businesses operating within the assessment area. However, 2018 D&B data shows the number of businesses has declined to 1,460 for the current evaluation. Second, management stated that there has been a large reduction in loans to small businesses because the borrowers have paid off their loans to better position themselves from a financial perspective. Third, management reported that several large regional and national banks are located in Statesboro and Savannah, which increases the level of competition for these types of loans. These financial institutions have no office, no loan production office, nor a locally-based lender in the assessment area, but offer extremely low-interest rates with 10- to 15-year terms that are not offered by The Claxton Bank. It should be noted that 14.7 percent of businesses and 24.0 percent of borrowers did not report revenue information.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	80.0	14	56.0	862	23.7
>1,000,000	5.3	5	20.0	1,448	40.0
Revenue Not Available	14.7	6	24.0	1,315	36.3
<b>Total</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>3,625</b>	<b>100.0</b>
<i>Source: 2018 D&amp;B Data, 1/1/2018 - 12/31/2018 Bank Data.</i>					

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

The distribution of home mortgage loans to borrowers of different incomes reflects a reasonable penetration given demographic data. Although the percentage of loans by number originated by the bank to low-income borrowers is much lower than the percentage of low-income families, the bank's performance is reasonable, as 23.4 percent of the assessment area families live below the poverty level. The percentage of loans by number originated to moderate-income borrowers is slightly lower than the percentage of moderate-income families. One home mortgage loan was originated to a business for investment purposes, which is categorized as income not available.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	26.9	2	9.1	96	6.4
Moderate	15.5	3	13.6	162	10.8
Middle	17.8	2	9.1	83	5.5
Upper	39.8	14	63.6	1,106	73.6
Not Available	0.0	1	4.6	55	3.7
<b>Total</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>1,502</b>	<b>100.0</b>
<i>Source: 2015 ACS Census; 1/1/2018 - 12/31/2018 Bank Data</i>					

### **Response to Complaints**

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.



## GLOSSARY

**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 metropolitan area/assessment area.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**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. Other family is further classified into "male householder" (a family with a male householder and no wife present) or "female householder" (a family with a female householder and no husband present).

**Family Income:** Includes the income of all members of a family that are age 15 and older.

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

**Geography:** A census tract 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 (approved, denied, and withdrawn).

**Home Mortgage Disclosure Loan Application Register (HMDA LAR):** The HMDA LARs record all applications received for residential purchase, refinance, home improvement, and temporary-to-permanent construction loans.

**Home Mortgage Loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans to purchase manufactured homes, and refinancings 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.

**Household Income:** Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households are only one person, median household income is usually less than median family income.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, 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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

**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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area:** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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.

**Rated Area:** A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Loan:** A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Upper-Income:** Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

# Public Comments

- None to be disclosed as of 4.1.2025

LOCATIONS



Main Branch

PO Box 247, 121 W Main St, Claxton, GA 30417  
Branch Phone: 912-739-5600

Lobby Hours

- Monday: 9AM - 4PM
- Tuesday: 9AM - 4PM
- Wednesday: 9AM - 4PM
- Thursday: 9AM - 4PM
- Friday: 9AM - 5PM
- Saturday: Closed
- Sunday: Closed

Drive-Up Hours

- Monday: 8:30AM - 4PM
- Tuesday: 8:30AM - 4PM
- Wednesday: 8:30AM - 4PM
- Thursday: 8:30AM - 4PM
- Friday: 8:30AM - 5PM
- Saturday: Closed
- Sunday: Closed

Services

Teller/Cash Services, Loans, New Accounts, CD's and IRA's, Wire Transfers, Safe Deposit Boxes, ATM, Night Depository



Jacksonville Branch

1 Independent Drive, Suite 1800, Jacksonville, FL 32202  
Branch Phone: 904-717-7220

Lobby Hours

- Monday: 9AM - 4PM
- Tuesday: 9AM - 4PM
- Wednesday: 9AM - 4PM
- Thursday: 9AM - 4PM
- Friday: 9AM - 5PM
- Saturday: Closed
- Sunday: Closed

Opened October 2024

Services

Teller/Cash Services, Loans, New Accounts, CD's and IRA's, Wire Transfers



## Square Branch

400 North Duval Street, Claxton, GA 30417

Branch Phone: 912-739-5602

### Lobby Hours

- Monday: 9AM - 5PM
- Tuesday: 9AM - 5PM
- Wednesday: 9AM - 5PM
- Thursday: 9AM - 5PM
- Friday: 9AM - 5PM
- Saturday: 8:30AM - 1PM
- Sunday: Closed

### Drive-Up Hours

- Monday: 9AM - 5PM
- Tuesday: 9AM - 5PM
- Wednesday: 9AM - 5PM
- Thursday: 9AM - 5PM
- Friday: 9AM - 5PM
- Saturday: 8:30AM - 1PM
- Sunday: Closed

### Services

Teller/Cash Services, Drive Up ATM, Night Depository



## Richmond Hill Branch

2591 Hwy 17, Suite 201 Richmond Hill, GA 31324

Branch Phone: 912-445-7005

### Lobby Hours

- Monday: 9AM - 4PM
- Tuesday: 9AM - 4PM
- Wednesday: 9AM - 4PM
- Thursday: 9AM - 4PM
- Friday: 9AM - 5PM
- Saturday: Closed
- Sunday: Closed

Opened April 2023

### Services

Teller/Cash Services, Loans, New Accounts, CD's and IRA's





## Bellville ATM

1433 Bernie Anderson Hwy, Bellville, GA 30414

Branch Phone:



## Newton Street

3 South Newton Street, Claxton, GA 30417

Branch Phone:

### Permanently Closed to Customer Traffic

Newton Street Loan Operations center is permanently closed to customer traffic. To speak with a member of our lending team, please visit our Main Branch Location at 121 West Main Street, in Claxton, Georgia or call 912-739-3322.



# Retail Banking Products and Services

# Checking Accounts

## Essential Checking

**No Minimum Balance Required**

**\$0 or \$6.50 Monthly Maintenance Fee**

No monthly maintenance fee if you sign up for e-statements AND maintain a \$500 daily balance OR maintain a daily balance of \$1,500.

**\$100 Minimum to Open**

There is a minimum deposit of \$100 required to open this account online.

**Unlimited Transactions**

**Includes Debit Card with Optional TCB SwipeNSave**

## Presidential Perks Checking

**No Minimum Balance Required**

**\$10 Monthly Maintenance Fee**

One simple fee with all the perks included!

**\$100 Minimum to Open**

There is a minimum deposit of \$100 required to open this account online.

**Unlimited Transactions**

**All the Perks Included**

Debit Card with Optional TCB SwipeNSave | Unlimited Cashiers Checks | Online BillPay | Two TCB Basic Check Orders per Calendar Year

## Elite Plus Checking

**Earns Interest**

Earns interest on balances over \$5,000.

**No Minimum Balance Required**

**\$0 or \$8.50 Monthly Maintenance Fee**

No monthly maintenance fee if you maintain a daily balance of \$5,000.

**\$100 Minimum to Open**

There is a minimum deposit of \$100 required to open this account online.

**Unlimited Transactions**

**Includes Debit Card with Optional TCB SwipeNSave**

## Senior Checking

**Must Be 55 or Over**

**No Minimum Balance Required**

**No Monthly Maintenance Fee**

**\$100 Minimum to Open** There is a minimum deposit of \$100 required to open this account online.

**Unlimited Transactions & Unlimited Check Writing**

**Includes Debit Card with Optional TCB SwipeNSave**

# Savings Accounts

## Add TCB Swipe-N-Save Automatic Round-Up Savings

TCB's optional SwipeNSave program makes it easy to save every day by automatically rounding up each purchase you make with your TCB MasterCard Debit Card to the nearest whole dollar and depositing that amount in your linked savings account. The best part is TCB matches 100% of your rounded-up savings for the first 90 days.

### Regular Savings

**Earns Interest**

Variable interest rate, compounded quarterly and credited quarterly

**\$0 or \$10.00 Quarterly Maintenance Fee**

No monthly maintenance fee if you maintain a balance daily balance of \$100.

**\$100 Minimum to Open**

There is a minimum deposit of \$100 required to open this account online.

**Unlimited Deposits**

**Limited Withdrawals**

A chargeable debit fee of \$5.00 will be charged for each debit transaction over 3 per quarter.

### Money Market

**Earns Interest**

Variable interest rate, compounded monthly and credited monthly.

**\$0 or \$5.00 Monthly Maintenance Fee**

No monthly maintenance fee if you maintain a daily balance of \$1,000.

**\$1000 Minimum to Open**

There is a minimum deposit of \$1000 required to open this account online.

**Unlimited Deposits**

**Limited Withdrawls**

A chargeable debit fee of \$5.00 will be charged for each debit transaction over 6 per statement cycle.

### CDs

**Earns Interest**

Fixed interest rate, compounds and credits periodically depending on CD duration.

**Multiple Durations Available**

- 91 days minimum deposit \$2500
  - 182 days minimum deposit \$2500
  - 12 months minimum deposit \$500
  - 18 months minimum deposit \$500
  - 24 months minimum deposit \$500
  - 36 months minimum deposit \$500
  - 48 months minimum deposit \$500
  - 60 months minimum deposit \$500
- 30 days minimum deposit \$2500

**Early Withdrawal Penalty**

There may be a 3 to 6 month early withdrawal penalty.

### IRAs

**Earns Interest**

Fixed interest rate, compounded monthly and credited monthly.

**Multiple Durations Available**

- 12 months minimum deposit \$500
- 24 months minimum deposit \$500
- 60 months minimum deposit \$500

**Tax Advantages**

Contributions may be tax deductible or qualified distributions may be tax free depending on account type.

**Required Minimum Distribution**

The IRS may require that you withdraw a minimum amount annually for some types of accounts.

# ADD YOUR DEBIT CARD WITH THE PUSH OF A BUTTON

Introducing Debit Card Push Provisioning For Mobile Wallets.

Pushing the limits of convenience: Adding your debit card to a mobile wallet has never been quicker, thanks to our effortlessly easy push provisioning. Just open card control from our mobile app and tap the “add to wallet” button, to add your card. No more entering the details or calling the bank for verification. Adding your debit card to a mobile wallet just became the easiest move in your financial playbook. Just another way TCB makes banking simple.



## Debit Card Controls

# Control your debit card right from the app.

Your debit card is in your control, with Card Controls in digital banking. Turn your card on and off instantly with the tap of a button, activate new cards, change your PIN, request temporary limit increases, set travel alerts, and report your card lost or stolen. It's never been easier to manage your card.

## Multi-Check Mobile Deposit

# Deposit checks remotely, without a trip to the branch.

Deposit checks anywhere at any time. With multi-check mobile deposit, you can deposit up to 25 checks at a time in one transaction directly from your smartphone. It is as easy as entering the check amount and snapping a photo. Save time and get more done with the iBankTCB digital banking app.<sup>1</sup>

## Digital Banking

# DIGITAL BANKING DONE RIGHT!

There is so much that you can do with the iBankTCB digital banking app, all without ever leaving your home. Check your balance, manage your card, send money all with a few taps. Banking has never been so easy — finally, a digital banking app for the modern age.

## Personal Online Banking

## Mobile Wallet Enabled

# Forgot your wallet? No problem pay with your phone.

We support all the major mobile payment platforms including Apple Pay, Google Pay, and Samsung Pay, so you can enjoy the security and convenience of making payments with your mobile device. Adding your card to a mobile wallet means that you can leave your actual wallet at home.



Account Details

**Manage your account and move money with just a few taps.**

Manage your money like a pro and stay connected with all your accounts. Check balances, schedule transfers, make loan payments, automate bills, initiate stop pays, and more – all from your phone, all on the go.

Automatic Bill Pay

**Never forget to pay a bill again, with TCB BillPay.**

Manage your money like a pro and stay connected with all your accounts. Check balances, schedule transfers, make loan payments, automate bills, initiate stop pays, and more – all from your phone, all on the go.<sup>2</sup>

**External Transfers**

Account Alerts

**Stay on top of your accounts with SMS and push notifications.**

Stay in the know with custom alerts from the iBankTCB digital banking app. You can set up SMS or push alerts on your available balances, cleared checks, debits, NSF items, pending ACH items, online transfers, BillPay, and more.<sup>3</sup>

SPIN PAY

**Pay anyone instantly via text message or email.**

With SPIN Pay from TCB you can send money to anyone in the US instantly directly from our app for free. All they need is a phone number or email address and a US based debit card. Unlike other P2P services, you don't need to maintain a separate funding account, and the recipient doesn't need to download an app. Transfers are made directly from your account to their account instantly.

**E-Statements**



## **Safe Deposit Boxes**

From house deeds to family jewelry, TCB Deposit Boxes help keep your most important items from getting lost, damaged, destroyed or stolen. Our safe deposit boxes are available in a variety of sizes and are competitively priced to help you secure your possessions. Ask a customer service representative for details.

Tele-banking Powerline 912-739-7693



## TCB COMMON ACCOUNT FEATURES FEE SCHEDULE

### Schedule of Fees

#### IMPORTANT ACCOUNT INFORMATION FOR OUR CUSTOMERS

**Limits and fees** - The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Replace debit card: \$15.00

Verify debit card PIN: \$10.00

Convenience Issue debit card: \$20.00

Check printing:

\* Fee depends on the style of check ordered

Cashier's Check: \$3.00 (non-customers)

Overdraft Fee (Paid Items) (each) \$32.00

Returned Item Fee (each) \$32.00

\* The categories of transactions for which an overdraft fee may be imposed are those by any of the following means: check, in-person withdrawal, or other electronic means.

Account Activity Printout: \$5.00

Account Research: \$25.00 per hour/ \$5.00 per copy

\$15.00 per statement with images

Account balancing assistance: \$25.00 per hour

Bill Pay Fee: \$4.95 per month/Consumer

\$7.95 per month/Commercial

\* Additional Bill Pay transactions in excess of 15 will be charged \$0.45 per transaction.

Stop Payment-All Items: \$32.00 per item

# Schedule of Fees

Wire Transfer Fee (outgoing):	\$25.00 domestic/ \$50.00 international
Digital Banking Wire Transfer Fee (outgoing):	\$15.00 domestic/ \$35.00 international
Garnishments:	\$50.00
Executions:	\$50.00
Levies:	\$50.00
Transfer fee for OD Protection:	\$5.00
Dormant Account:	\$5.00 per month/ \$60.00 maximum

- \* An account is dormant if for 12 months:
  - There have been no deposits or withdrawals to the account
  - There has been no communication about the account
  - Account statements returned for an incorrect address

ATM Limits:

You may withdrawal no more than \$500.00 per day. There is a Foreign ATM Fee of \$2.00 per withdrawal charged at ATMs we do not own or operate.

Mastercard Debit Card Limits:

You may not exceed \$2,000.00 in signature-based transactions per day or \$2,000.00 in PIN based point-of-sale transactions per day unless a different dollar limit has been disclosed to you. You may not exceed \$500.00 per day in cash withdrawals from an ATM.

Early Closure of Checking and Savings Accounts:

There will be a \$10.00 charge if the account closes within six months of opening.



## **Loans:**

- Short Term Loans
- Term Loans
- Real Estate Construction
- Overdraft Line of Credit
- Secured Loans
- Business Line of Credit
- Commercial Real Estate
- SBA
- Unsecured Loans
- Home Equity Line of Credit
- Residential Real Estate
- Credit Cards

## **Loan Fees:**

- All new real estate loans consumer or business- 1% Loan Origination Fee with minimum of \$500
- Consumer Real Estate Renewals - \$500 Loan Origination Fee
- Business Real Estate Renewals - \$500 Loan Origination Fee
- Non real estate loans consumer or business - \$300 Loan Origination Fee



## Georgia Facility-Based Assessment Area Maps

<u>Assessment Area</u>	<u>MSA Code</u>	<u>Counties Included</u>
Claxton, Bellville	Non-MSA 9703/9702	Evans
Richmond Hill	42340 9203.03	Bryan
Main Office 121 W Main St. Claxton, GA 30417		
Claxton Square Branch 400 North Duval St. Claxton, GA 30417		
Bellville Branch (Closed) 1433 Bernie Anderson Hwy, Bellville, GA 30417		
Richmond Hill Branch 2591 Hwy 17 Suite 201 Richmond Hill, GA 31324		



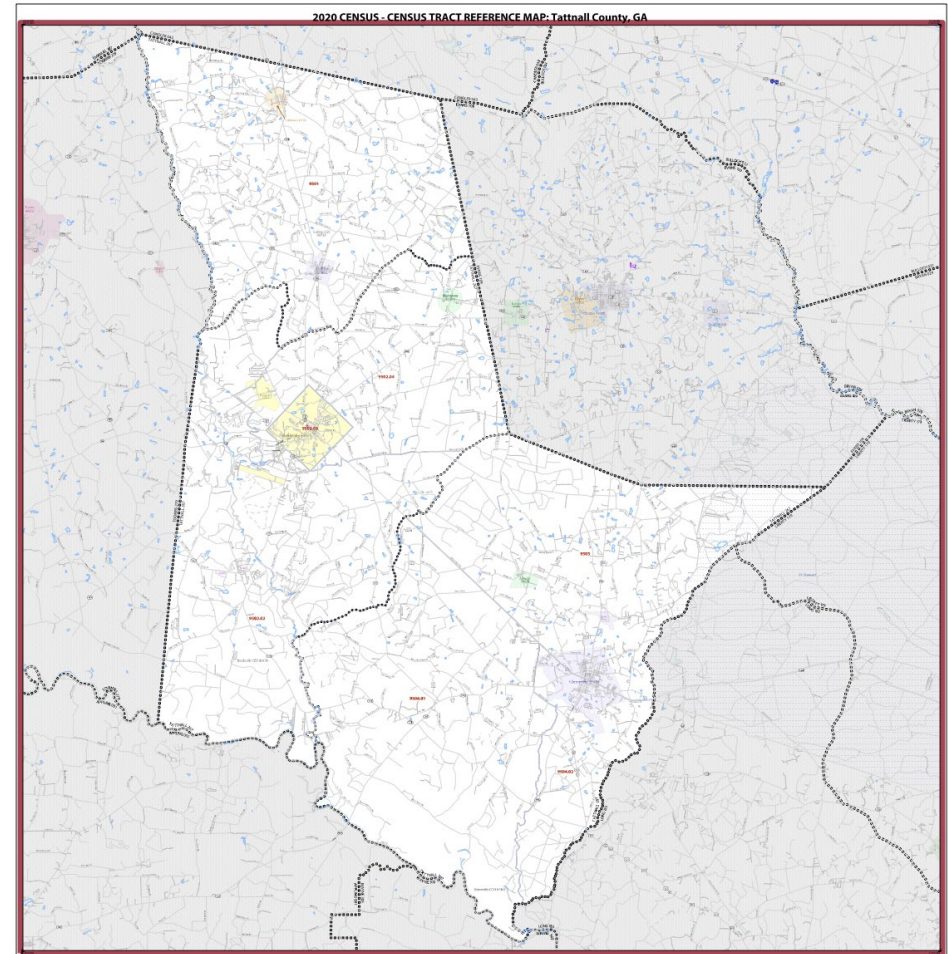


**Georgia**  
**Retail Lending Assessment Area**

Tattnall County  
Evans County  
Bryan County

## Tattnall County

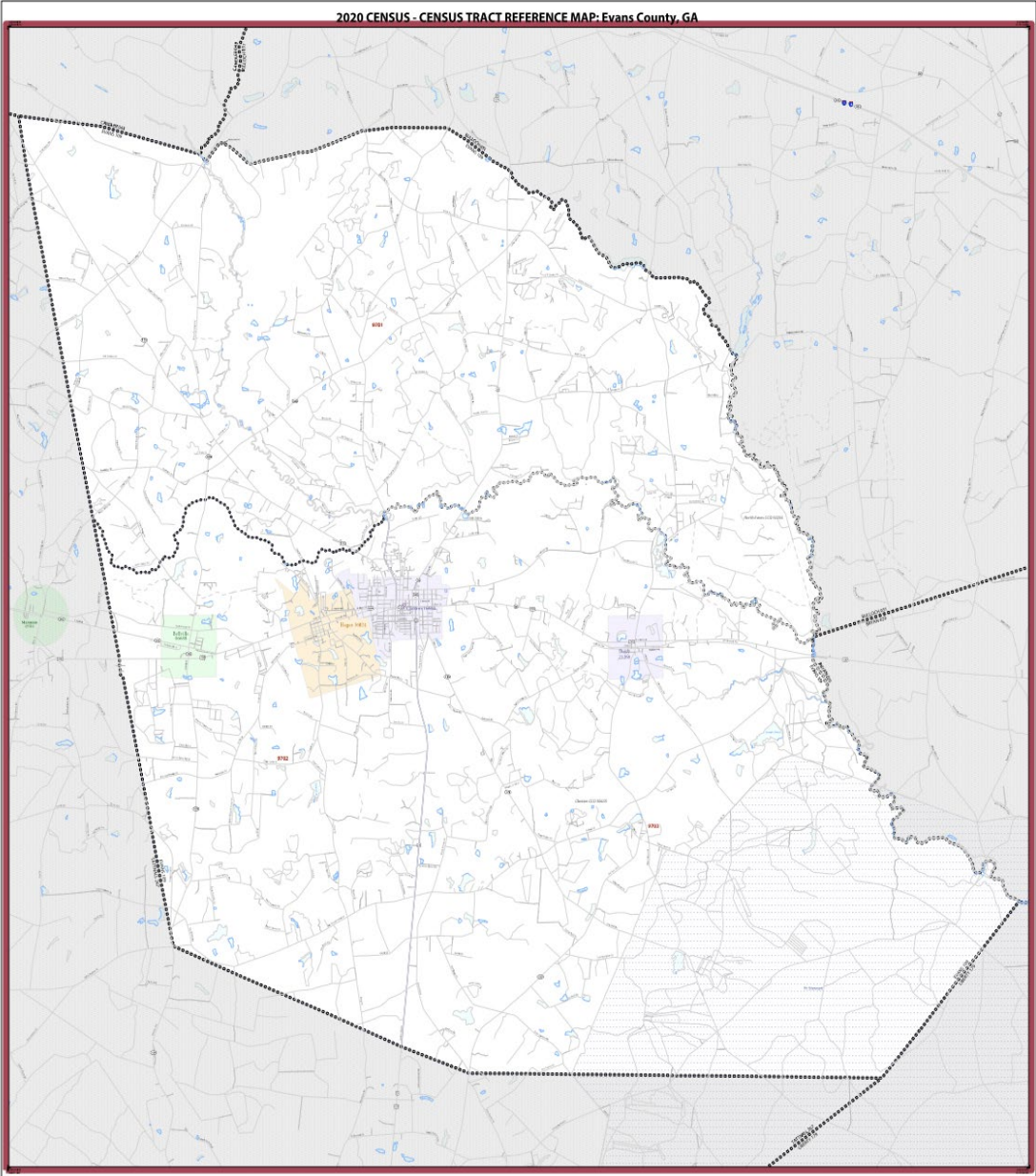
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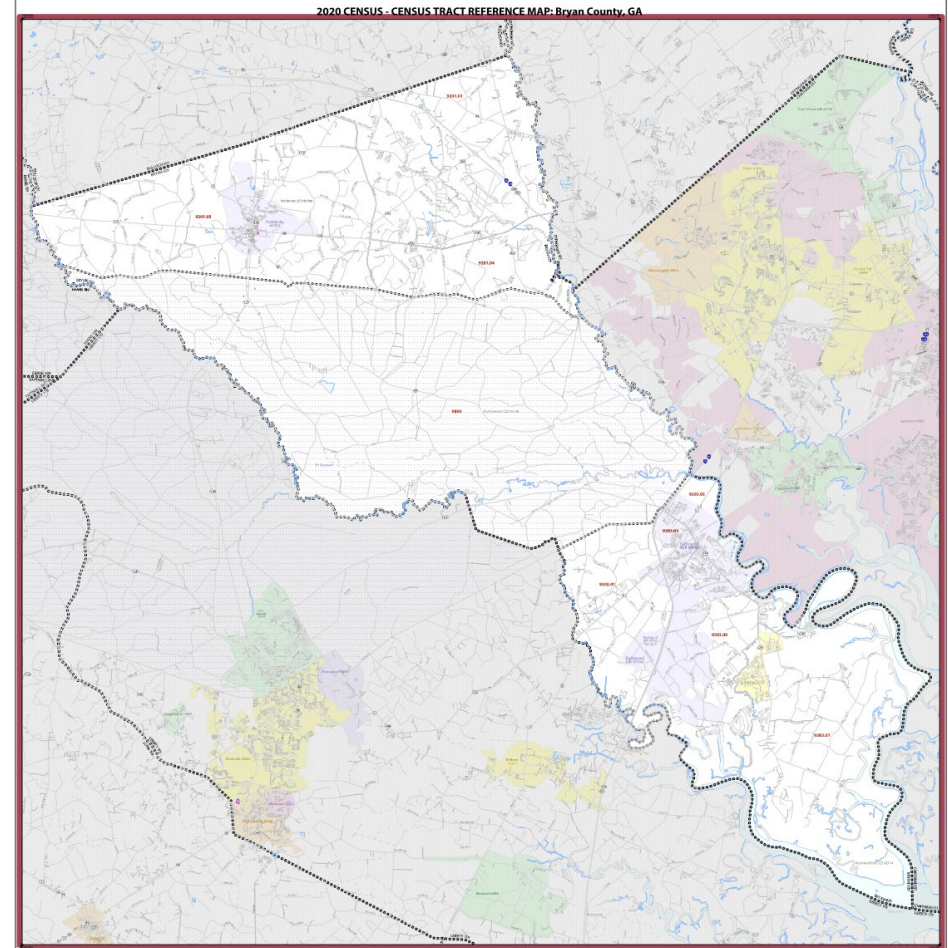
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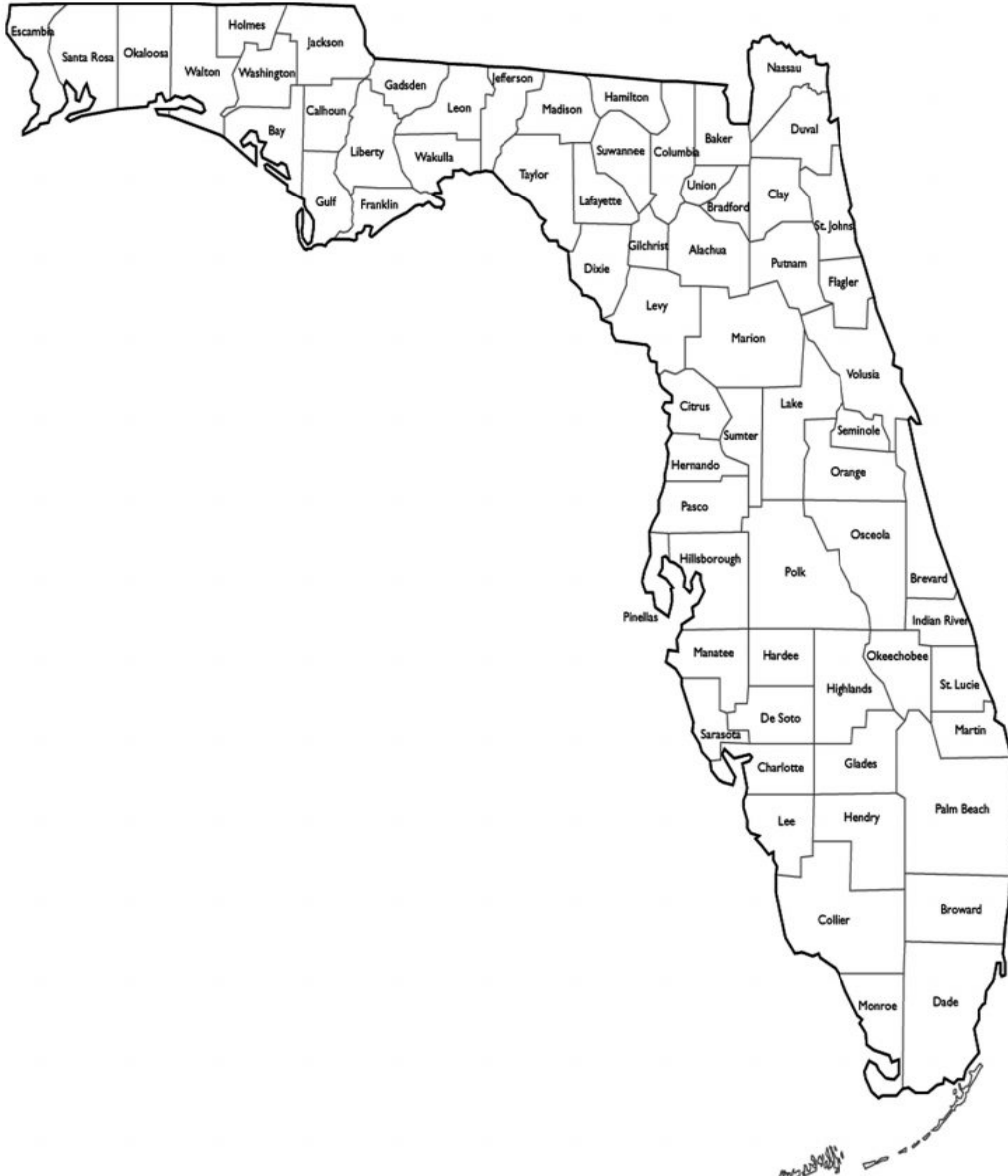
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# Bryan County

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## Florida Retail Lending Assessment Area

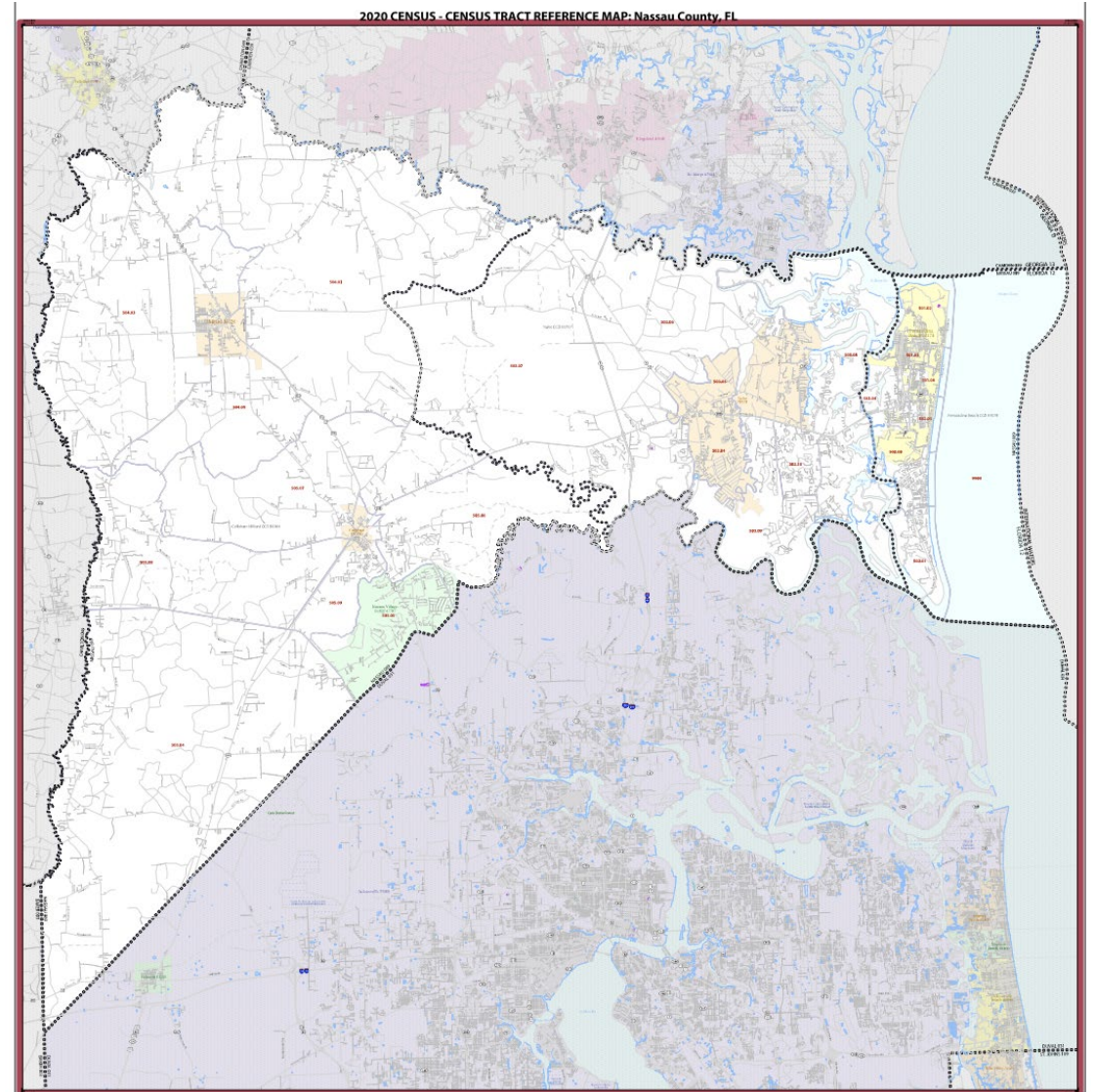
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St. Johns County  
Clay County



## Nassau County

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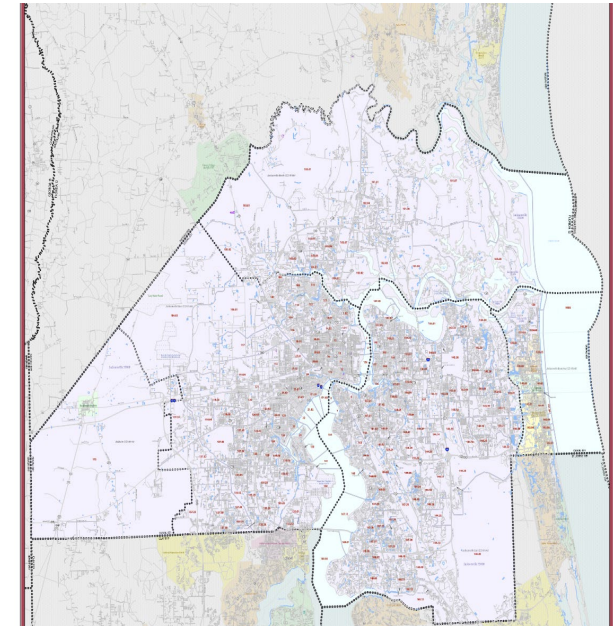
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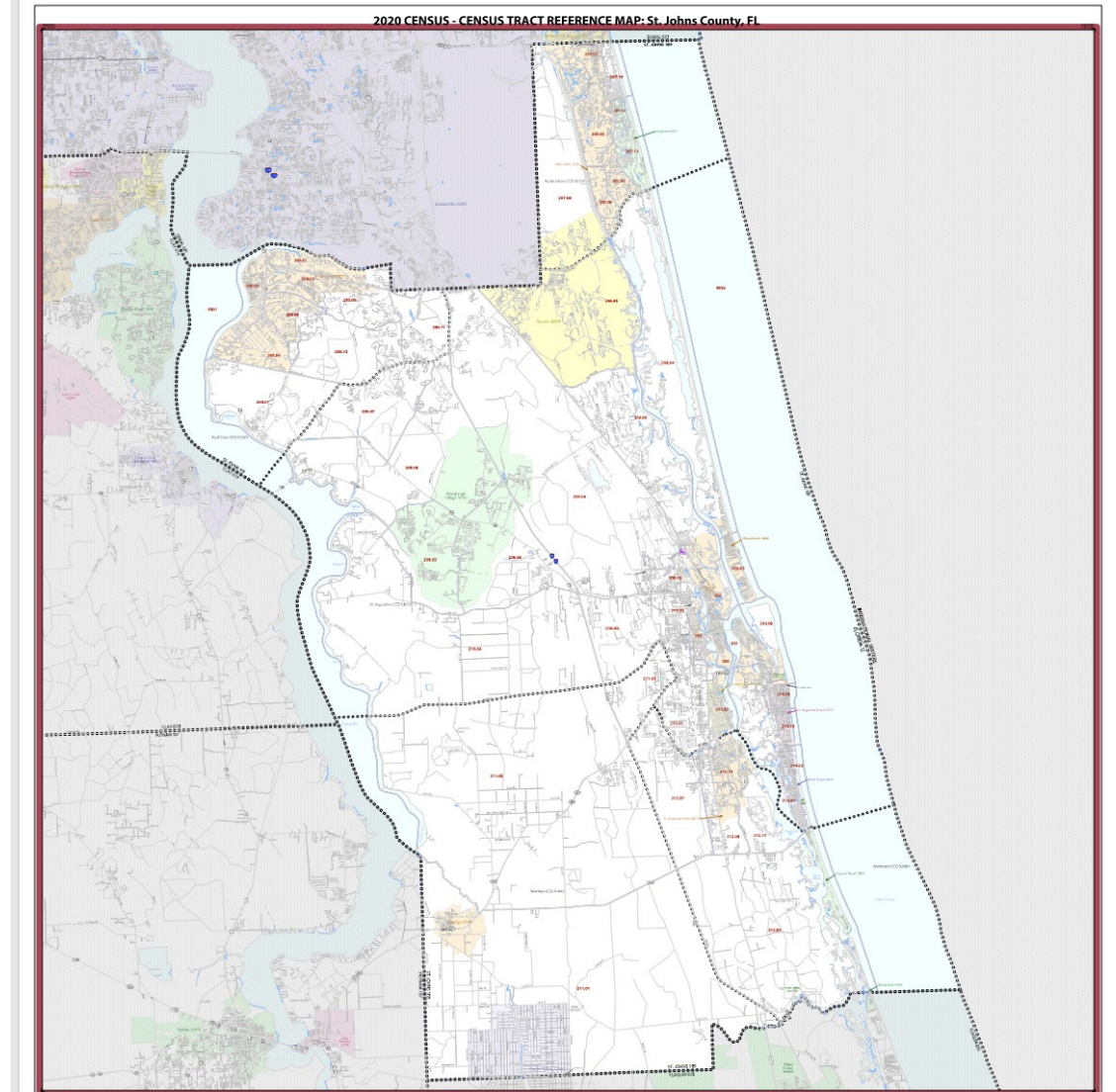
## Duval County





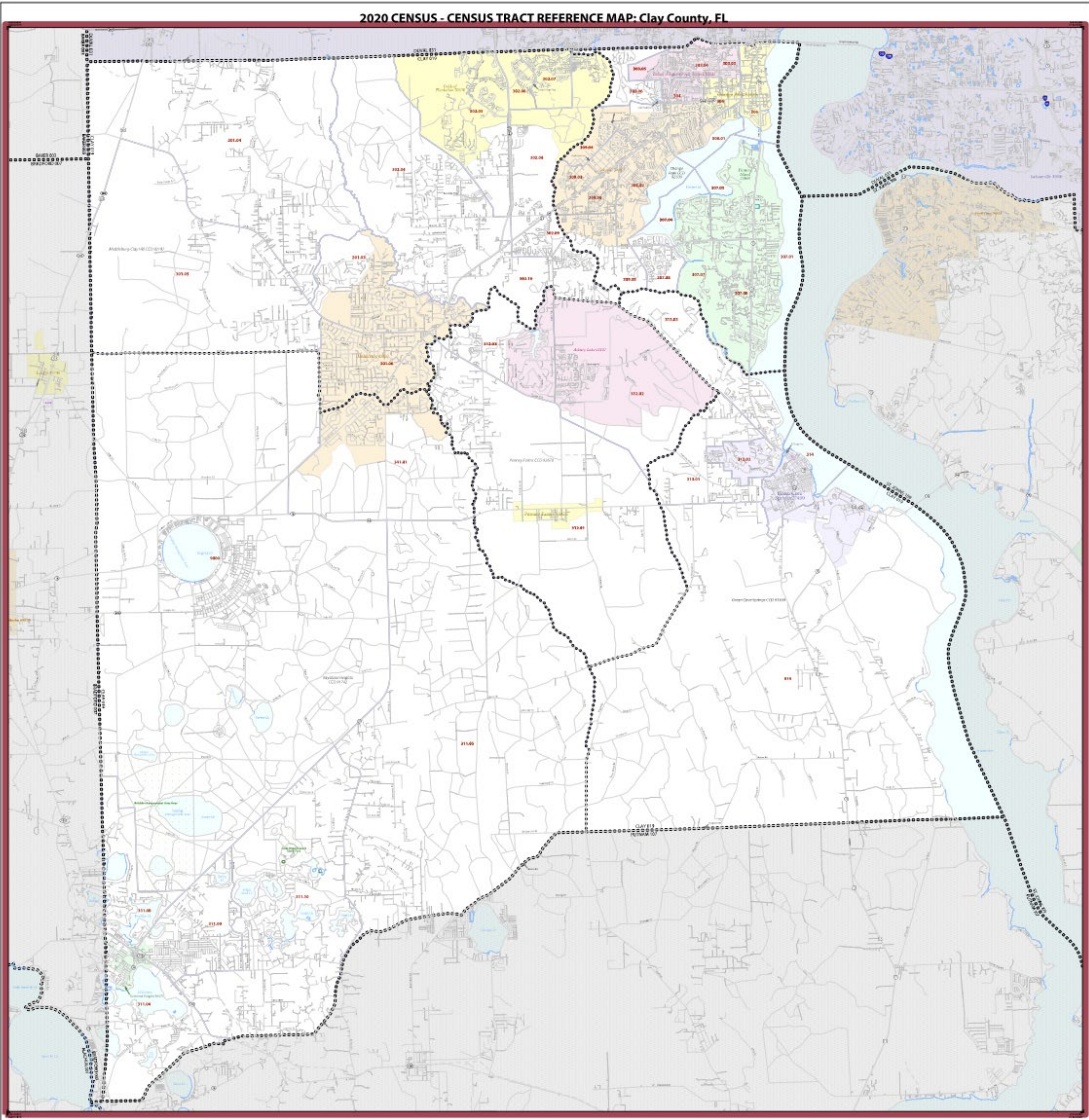
# St. Johns County

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# Clay County

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## Community Reinvestment Act (CRA) Notice

In accordance with the federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) assesses our efforts to meet the credit needs of the communities we serve, while maintaining safe and sound business operations. This performance record is also considered by the FDIC when reviewing certain applications submitted by our institution.

We value and encourage your participation in this process.

### Access to CRA Information

You have the right to obtain information regarding our operations and performance under the CRA. The following resources are available for your review at this branch:

- The public section of our most recent CRA evaluation, prepared by the FDIC.
- A list of services offered at this branch.

Additionally, upon request, we will provide the following information within five business days:

1. A map of the assessment area surrounding this branch, which is used by the FDIC to evaluate our CRA performance.
2. Information regarding other branches in the assessment area.
3. A list of services offered at these branches.
4. Data on our lending performance in the assessment area.
5. Copies of any written comments received concerning our CRA performance in the assessment area, along with our responses to those comments.

If we are operating under an approved strategic plan, a copy of that plan will also be made available. For information about our CRA performance in other communities we serve, the public file for our entire bank is accessible at our main office located at:

**121 West Main Street, Claxton, GA 30417.**

### Submission of Comments and FDIC Examinations

At least 30 days prior to the start of each quarter, the FDIC publishes a list of banks scheduled for CRA examinations. This list can be obtained from the FDIC Regional Director at the following address:

**FDIC, 10 Tenth Street NE, Suite 800, Atlanta, GA 30309-3906**

You may submit written comments on our CRA performance to:

**Melissa Deal, Senior Risk Officer and CRA Officer,  
and the FDIC Regional Director.**

Comments may also be submitted electronically via the FDIC's website at **[www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra)**. All submitted comments, along with our responses, will be considered during the FDIC's evaluation of our CRA performance and may become public.

Additionally, you may request access to any comments received by the FDIC Regional Director. Announcements of applications related to CRA filed by our institution or our affiliate, **Southern Bankshares**, may also be requested from the CRA Officer or the Federal Reserve Bank located at:

**1000 Peachtree Street NE, Atlanta, GA 30309.**

## Home Mortgage Disclosure Act (HMDA) Notice

As part of our commitment to transparency and compliance with the **Home Mortgage Disclosure Act (HMDA)**, information regarding our residential mortgage lending is available for online review.

This data includes:

- The geographic distribution of loans and applications
- Characteristics of applicants and borrowers (ethnicity, race, sex, age, and income)
- Details on loan approvals and denials

You can access this data on the **Consumer Financial Protection Bureau (CFPB)** website at: [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)

HMDA data for other financial institutions are also available on this website for comparison and further research.

For any questions or additional information, please contact **The Claxton Bank** at your nearest branch.

## Loan to Deposit Ratio

Quarter Ending Date	Total Loans in Millions	Total Deposits in Millions	Loan to Deposit Ratio
March 2016	76.754	110.026	69%
June 2016	77.536	105.710	73%
September 2016	76.825	103.158	74%
December 2016	76.177	101.854	75%
March 2017	77.552	108.205	71%
June 2017	78.992	108.205	73%
September 2017	78.142	108.245	72%
December 2017	78.451	115.882	67%
March 2018	78.896	119.717	65%
June 2018	79.210	112.657	70%
September 2018	78.156	109.143	71%
December 2018	78.780	107.493	73%
March 2019	78.00	110.00	71%
June 2019	82.31	112.99	73%
September 2019	75.908	103.71	73%
December 2019	73.547	98.802	74%
March 2020	73.231	106.165	69%
June 2020	77.647	118.889	65%
September 2020	77.290	119.590	65%
December 2020	73.660	121.931	60%
March 2021	83.519	129.878	64%
June 2021	83.235	131.492	63%
September 2021	77.490	129.056	60%
December 2021	80.841	133.142	61%
March 2022	85.016	137.825	62%
June 2022	89.960	134.567	67%
September 2022	93.312	135.814	69%
December 2022	95.858	135.489	71%
March 2023	99.344	143.874	69%
June 2023	100.471	138.939	72%
September 2023	101.219	143.999	70%
December 2023	102.511	148.177	69%
March 2024	101.896	154.116	67%
June 2024	98.938	156.668	64%
September 2024	106.433	162.068	67%
December 2024	119.060	188.089	65%