

## **PUBLIC DISCLOSURE**

October 7, 1996

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

AmSouth Bank of Walker County

Jasper, Alabama

Federal Reserve Bank of Atlanta  
104 Marietta Street, N.W.  
Atlanta, Georgia 30303

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## **GENERAL INFORMATION**

This document is an evaluation of the Community Reinvestment Act (CRA) performance of AmSouth Bank of Walker County, Jasper, Alabama, by the Federal Reserve Bank of Atlanta, the institution's supervisory agency.

This evaluation represents the agency's current assessment and rating of the institution's CRA performance based on an examination conducted as of October 7, 1996. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977, (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution, and (2) take the record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the agencies to make public certain portions of their CRA performance assessments of financial institutions.

### **Basis for the Rating**

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

## **ASSIGNMENT OF RATING**

### **Identification of Ratings**

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

#### **Outstanding record of meeting community credit needs.**

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

#### **Satisfactory record of meeting community credit needs.**

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

#### **Needs to improve record of meeting community credit needs.**

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

#### **Substantial noncompliance in meeting community credit needs.**

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

### **Institution's Rating:**

This institution is rated Satisfactory, based on the findings presented in the following discussion of the institution's performance.

## **DISCUSSION OF INSTITUTION'S PERFORMANCE**

### **I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS**

**Activities conducted by the institution to ascertain the credit needs of its community, including the extent of the institution's efforts to communicate with members of its community regarding the credit services being provided by the institution.**

The efforts made by AmSouth Bank of Walker County to ascertain community credit needs are ongoing. The primary method of determining local credit needs is direct communication with members of the community. Regular contact is made with existing and potential customers, local government officials, realtors, minority-owned and small businesses, and civic and religious leaders. Bank staff and community leaders have held meetings to identify community needs and to inform the community of the bank's products and services. One major community ascertainment effort is the bank's call program. Members of the board of directors, loan officers, and other bank personnel have made calls to the following organizations: the Jasper Chamber of Commerce, the Jasper Housing Authority, Walker County Realtors, the Jasper Fire Department, the Walker County Industrial Development Authority, several minority-owned businesses, and various social and fraternal organizations. Some of the needs identified through contact with these organizations included low-income housing, credit education, new mortgage loan products, and small business development in the city of Jasper.

Participation and membership in civic, social, religious, governmental, community, and nonprofit organizations are also effective methods of gaining an understanding of the community. Bank management and staff participate in these organizations.

**The extent of participation by the institution's board of directors in formulating the institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act (CRA).**

Bank management has developed a CRA policy and an action plan. The CRA policy provides an overview of the responsibility of the board of directors, local city presidents, and regional executives. The CRA action plan contains specific goals and objectives for complying with the spirit of CRA. It defines the bank's efforts to ascertain credit needs and familiarize the community with loans and services offered by the bank.

The board has expanded the CRA Statement to summarize the bank's CRA policies, programs, and performance. Credit-related marketing efforts, special lending programs, and other activities involving the bank are also listed in this document. The bank's directors have made efforts to ensure compliance with the technical requirements of CRA. Each year, the board reviews and adopts the CRA Statement. The most recent statement was approved on March 28, 1996. Bank management and the board of directors also ensure that personnel are trained on CRA outreach policies.

## **DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)**

### **II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED**

**The extent of the institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the institution.**

AmSouth Bancorporation, the bank's holding company, has a corporate marketing department that oversees media-related advertising for the bank. Corporate marketing coverage is extensive because the bank uses mainstream print media such as newspapers, trade journals, targeted publications where available, and broadcast media such as television and radio. Budgets are also provided at the city level to promote the bank's services and products through event-related sponsorships and related brochures and programs.

AmSouth Bank of Walker County uses a variety of media to advertise its products and services to the community. Management advertises monthly in the Daily Mountain Eagle, Jasper's daily newspaper, which has a circulation of 30,000. Also, the bank places radio advertisements on WZPQ, which has 50,000 listeners. Other marketing methods include direct mail, statement stuffers, in-house branch merchandising, lobby brochures, and word-of-mouth advertising by directors, officers, employees, and customers. A large majority of the bank's advertisements within the city of Jasper promote the bank's image. These advertisements have been placed in sports programs, chamber of commerce publications, and civic/cultural and nonprofit newsletters.

AmSouth Bank's local marketing department developed and sponsored several marketing campaigns in an attempt to reach all segments of the bank's community. During the spring of 1995, two major campaigns were conducted which included the 1995 mortgage campaign and the 1995 Business Banking FlexLine marketing campaign. The mortgage campaign focused on the current mortgage environment. The Business Banking FlexLine campaign introduced a new line of credit targeted to small businesses.

The bank conducted a media campaign in 1996 to promote its Affordable Housing Program. This marketing initiative was in addition to the calling efforts of mortgage loan officers who call on realtors serving low- to moderate-income areas. The initiative consisted of six weeks of multimedia advertisements with an emphasis on reaching low- to moderate-income consumers. Loan officers have also marketed this product through numerous home ownership seminars that have been conducted.

## **DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)**

### **II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)**

During 1996, the bank continued to promote its FlexLine product to small business owners. This product provides relatively uncomplicated financing and deposit services to businesses with annual revenues of \$5 million or less. The financing option has lower fees than conventional business financing. Marketing initiatives included personal calling; branch advertising such as banners; direct mail; and advertising in newspapers and business-oriented magazines. Goals were established for loans and deposits, and the calling effort became a part of the existing call program.

During the summer of 1996, AmSouth Bank of Walker County sponsored a campaign that introduced the new bank president to the community. In the fall of 1996, a business banking campaign was introduced which offered special product bonuses to small businesses. The most recent campaign sponsored by the bank in the late fall of 1996 focused on attracting deposit accounts, increasing installment loan volume, and acquiring new EssentialLine customers. The bank's Home Equity Lines of Credit (HELOC) EssentialLine promoted no closing costs, origination fees, or annual fees.

**The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.**

The bank offers a variety of credit products to meet the community's credit needs. The types of credit products offered include consumer loans, real estate loans, farm loans, home improvement loans, personal lines of credit, and loans to businesses of all sizes. Management reviews the bank's credit products annually to determine their effectiveness in addressing the financial needs of the community. A review of the loan portfolio revealed that the bank extends all types of credit offered. The composition of the loan portfolio according to the September 30, 1996 Consolidated Reports of Condition and Income is as follows:

## **DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)**

### **II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)**

<b>LOAN TYPE</b>	<b>PERCENTAGE</b>
Construction and development	3.3
Secured by one- to four-family dwellings	32.2
Other real estate:	
Farmland	1.0
Nonfarm nonresidential	5.2
Agricultural and production	0.2
Commercial and industrial	31.8
Loans to individuals	26.3
Total	100.0

As illustrated by the table above, a large dollar percentage of the bank's loan portfolio consisted of loans secured by one- to four-family dwellings, followed by commercial loans and loans to individuals.

According to the September 30, 1996 Consolidated Reports of Condition and Income, the bank's total assets were \$64 million, and the bank's loan-to-deposit ratio was 45 percent.

The primary credit needs of the community have been identified as affordable housing and small business loans. Bank management plans to continue to provide affordable housing financing and to help establish a Community Development Corporation designed to assist small businesses.

The bank currently offers an Affordable Housing Program that has flexible underwriting criteria, but AmSouth Bank of Walker County did not originate any loans under this program in either 1995 or 1996.

#### **The institution's participation in governmentally insured, guaranteed, or subsidized loan programs for housing, small businesses, or small farms.**

The bank offers Small Business Administration (SBA), Federal Housing Administration (FHA), and Veterans Administration (VA) loans. Although FHA and VA loans are administered by an affiliate, AmSouth Bank of Alabama, AmSouth Bank of Walker County originated two FHA/VA loans in 1995 totaling \$103,160 and to date has originated one FHA/VA loan in 1996 totaling \$23,312. In addition, the bank originated five SBA loans since March 1995 and currently has two SBA loans in process. The total dollar amount of the originated SBA loans is \$895,447, and the total dollar amount of the loans in process is \$200,000.

## DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

### **III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES**

#### **Reasonableness of Delineated Community**

AmSouth Bank of Walker County has defined its delineated community as portions of Walker County. The delineation seems to be reasonable and does not arbitrarily exclude low- or moderate-income areas. The delineation consists of 10 census tracts; 8 are middle-income tracts, and 2 are upper-income tracts. The delineation contains no low- or moderate-income census tracts.

#### **The geographic distribution of the institution's credit extensions, credit applications, and credit denials.**

AmSouth Bank of Walker County has identified consumer and commercial loans as its major credit products. During the examination, 90 consumer loans and 45 business loans originated within six months of the examination date were sampled to determine how many are in the bank's delineated community. 82 percent of the commercial loans sampled and 66 percent of the consumer loans are in the delineation. Although the bank's delineation does not include low-income or moderate-income census tracts, further analysis of the sample indicated that the bank extends consumer loans to individuals of all income levels in its delineation. The business loans were not included in the analysis because the information available was insufficient to determine whether the bank made loans to businesses of different sizes. For consumer loans, the distribution of borrowers by income level as compared to community demographics is as follows:

<b>BORROWER INCOME LEVEL (PERCENTAGE OF MEDIAN FAMILY INCOME)</b>	<b>PERCENTAGE OF FAMILIES IN DELINEATION</b>	<b>CONSUMER LOANS</b>	
		<b>NUMBER OF LOANS</b>	<b>PERCENTAGE</b>
Low (Less than 50)	17%	7	11.9%
Moderate (50-79)	18%	11	18.6%
Middle (80-119)	19%	11	18.6%
Upper (120 and above)	46%	30	50.9%
Total	100%	59	100.0%

**DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)**

**III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES (CONTINUED)**

The geographic distribution of the bank's lending indicates no arbitrary exclusion of any particular geography in its delineation. Approximately 70 percent of the area residents live in middle-income census tracts and 30 percent live in upper-income census tracts. The analysis showed the following geographic distribution of loans made in the bank's delineation:

<b>CENSUS TRACT TYPE</b>	<b>POPULATION PERCENTAGE</b>	<b>PERCENTAGE OF CONSUMER LOANS</b>	<b>PERCENTAGE OF BUSINESS LOANS</b>
Middle-income	70%	29%	6%
Upper-income	30%	71%	94%

Although 8 of the 10 census tracts in the bank's delineation are classified as middle-income, the majority of consumer and business loans are originated in the upper-income census tracts, largely because of the population concentrations in the two upper-income census tracts. According to 1990 Census data, 24,423 citizens reside in the eight middle-income census tracts and 10,422 citizens reside in the two upper-income census tracts. Therefore, on a per tract basis, the two upper-income census tracts are more densely populated. The average number of citizens residing in each of the two upper-income census tracts is approximately 5,211, compared to 3,052 in each of the eight middle-income census tracts. The average number of households is 1,167 in each of the middle-income tracts and 2,011 in the upper-income census tracts. The average number of families is 900 in each of the middle-income tracts and 1,514 in the upper-income census tracts. The loan distribution is also influenced by the upper-income tracts' close proximity to the bank's two offices.

**The institution's record of opening and closing offices and providing services at offices.**

AmSouth Bank of Walker County has not closed any offices; however, the bank's board has adopted a branch closing policy in compliance with section 42 of the Federal Deposit Insurance Act. AmSouth Bank of Walker County operates one full-service branch office in addition to its main office; both offices are located in the city of Jasper. The office locations seem to be reasonable, and the bank's operating hours reasonably accommodate the needs of the community. In addition to having regular operating hours Monday through Friday, the bank also offers Saturday banking hours.

## **DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)**

### **IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES**

**Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement.**

AmSouth Bank of Walker County is in compliance with the substantive provisions of antidiscrimination laws and regulations. No evidence of discrimination or other illegal credit practices was noted during the review of the bank's loan policies and procedures. These policies and procedures are reviewed periodically by management. No practices have the intent or the effect of discouraging applications. All loan applications are evaluated on the basis of criteria that are generally considered to be consistent with sound banking practices.

The bank has established second review procedures for all declined credit applications. These procedures were designed to ensure that all applicants receive fair and equal consideration. In addition, the bank provides annual fair lending training for its loan personnel.

**Evidence of prohibited discriminatory or other illegal credit practices.**

AmSouth Bank of Walker County solicits applications from all segments of its local community. An analysis of the bank's accepted and rejected credit applications revealed no evidence of discrimination against any protected classes of applicants.

### **V. COMMUNITY DEVELOPMENT**

**The institution's participation, including investments, in local community development and redevelopment projects or programs.**

Although formal community development activities are limited in the Walker County area, management has been effective in using other avenues to help foster the development of the county. For example, management has taken an active role in non-credit-related activities that help develop the local community. Officers of the bank are involved with community organizations such as Leadership Walker County and the Walker County Industrial Development Authority. An assistant vice president of the bank attends biweekly meetings with Leadership Walker County to assess and recognize the needs of the local community for business development. Discussions have also been held between the bank's president and members of the Walker County Industrial Development Authority regarding the downtown revitalization project and the possible development of a Community Development Corporation.

## **DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)**

### **V. COMMUNITY DEVELOPMENT (CONTINUED)**

**The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions, and other factors.**

#### Community Profile

According to 1990 Census data, the population of the bank's delineated community was 34,845. The U.S. Census data also show that 72 percent of the 14,469 housing units in Walker County were owner-occupied, 20 percent were rental units, and 8 percent were vacant. The median housing age was 16 years, and the median housing value was \$46,981. Although the bank's delineation does not include low- or moderate-income census tracts, low- and moderate-income families can be found throughout the community. Illustrated below are characteristics of the bank's delineation.

<b>TRACT SUMMARY</b>	
Total number of tracts	10
Number of low-income tracts	0
Number of moderate-income tracts	0
Number of middle-income tracts	8
Number of upper-income tracts	2
<b>INCOME SUMMARY</b>	
Median family income	\$27,067
Total number of families	10,233
Percentage of low-income families	17
Percentage of moderate-income families	18
Percentage of middle-income families	19
Percentage of upper-income families	46
Percentage of families below poverty level	12

## DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

### V. COMMUNITY DEVELOPMENT (CONTINUED)

The 1992 U.S. Census employment data for county business patterns show a total of 1,384 businesses in Walker County. 821 (59 percent) were businesses with fewer than 50 employees. The local economy is predominately retail and service-oriented. Approximately 31 percent of the total number of businesses are retail trade, and 30 percent are service-oriented. According to the Bureau of Labor Statistics, the unemployment rate as of September 1996 for Walker County was 6.0 percent, compared with the unemployment rate of 4.7 percent for the state of Alabama.

#### Bank Profile

AmSouth Bank of Walker County had \$64 million in total assets as of September 30, 1996. The bank is located in Jasper, Alabama, and operates two offices in Walker County. AmSouth Bank of Walker County was organized on September 29, 1986, and opened for business on October 14, 1986. The bank operates in a highly competitive market with seven other financial institutions. The bank is meeting the credit needs of the community commensurate with its size and resources. No factors that would restrict the bank's ability to serve local credit needs were noted.

AmSouth Bank of Walker County is a subsidiary of AmSouth Bancorporation, a bank holding company headquartered in Birmingham, Alabama, and operates as an integral part of the AmSouth Bancorporation system. AmSouth Bancorporation, which reported September 30, 1996 assets of \$18.6 billion, operates 271 banking offices in 4 states: 125 offices in Alabama, 116 offices in Florida, 23 offices in Tennessee, and 7 in Georgia.

**Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.**

AmSouth Bank of Walker County has supported its community through numerous contributions to several civic and charitable organizations in Walker County. As a retail bank primarily engaged in small business and consumer lending, the bank's relationship with organizations sharing community development missions are necessary to achieve effective community outreach and to create additional retail lending opportunities.

TO THE INSTITUTION EXAMINED:

THIS COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION WAS PREPARED BY THE FEDERAL RESERVE BANK OF ATLANTA. THE FOLLOWING ACTIONS MUST BE TAKEN TO FULFILL THE CRA'S REQUIREMENTS.

- C AT A MINIMUM, PLACE THE EVALUATION IN YOUR CRA PUBLIC FILE LOCATED AT YOUR HEAD OFFICE (AND A DESIGNATED OFFICE IN EACH OF YOUR LOCAL COMMUNITIES) NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THE EVALUATION.
- C PROVIDE A COPY OF THE EVALUATION TO THE PUBLIC UPON REQUEST (YOU ARE PERMITTED TO CHARGE A FEE NOT TO EXCEED THE COST OF REPRODUCTION AND MAILING IF APPLICABLE) NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THIS LETTER.
- C ADD THE FOLLOWING LANGUAGE TO YOUR CRA PUBLIC NOTICE THAT IS POSTED IN EACH OF YOUR OFFICES, NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THE EVALUATION:

“YOU MAY OBTAIN THE PUBLIC SECTION OF OUR MOST RECENT CRA PERFORMANCE EVALUATION, WHICH WAS PREPARED BY THE FEDERAL RESERVE BANK OF ATLANTA, AT (YOUR MAIN OFFICE ADDRESS).”

**FEDERAL RESERVE BANK OF ATLANTA**

ASSISTANT VICE PRESIDENT

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
CYNTHIA C. GOODWIN

\_\_\_\_\_  
(Title)

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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TO THE FEDERAL RESERVE BANK OF ATLANTA

A COPY OF THE COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION PREPARED AS OF THE CLOSE OF BUSINESS OCTOBER 7, 1996, BY AN EXAMINER FOR THE FEDERAL RESERVE BANK OF ATLANTA HAS BEEN RECEIVED AND WILL BE MADE AVAILABLE TO THE PUBLIC IN THE MANNER STATED IN THE LETTER WHICH ACCOMPANIED THE EVALUATION.

\_\_\_\_\_  
(Signature of Authorized Officer)

\_\_\_\_\_  
(Title)

AMSOUTH BANK OF WALKER COUNTY  
\_\_\_\_\_  
(Name of Bank)

JASPER, ALABAMA  
\_\_\_\_\_  
(Location)

# FEDERAL RESERVE BANK OF ATLANTA

Cynthia C. Goodwin  
ASSISTANT VICE PRESIDENT

March 7, 1997

Board of Directors  
AmSouth Bank of Walker County  
Post Office Box 3311  
Jasper, Alabama 35502

Dear Board Members:

Enclosed is the bank's Community Reinvestment Act Performance Evaluation prepared by Federal Reserve Examiner Gayle Askew using the guidelines established by the Federal Financial Institutions Examination Council. This evaluation was prepared in accordance with the Community Reinvestment Act (CRA), as amended by the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, and must be made available to the public. The following actions must be taken to fulfill the CRA's requirements.

- C At a minimum, place the evaluation in your CRA public file located at your head office (and a designated office in each of your local communities) no later than 30 business days after receiving this letter.
- C Provide a copy of the evaluation to the public upon request (you are permitted to charge a fee not to exceed the cost of reproduction and mailing if applicable) no later than 30 business days after receiving this letter.
- C Add the following language to your CRA public notice that is posted in each of your offices, no later than 30 business days after receiving the evaluation:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Federal Reserve Bank of Atlanta, at (your main office address)."

Please acknowledge receipt of this evaluation by signing and returning the attached blue form. The format and content of the evaluation should not be altered or abridged in any manner. You may wish to comment on this information detailing actions the bank has taken since the examination to meet its obligations under the CRA. Any written comments concerning the evaluation placed in the public file should also be forwarded to this office. If you believe any of the information included in the public evaluation is proprietary, please contact this Reserve Bank so that the appropriate action can be taken.

Board of Directors  
AmSouth Bank of Walker County  
Jasper, Alabama

Our Community Affairs staff is available to assist you in determining and responding to community credit needs. Please feel free to contact Mr. Courtney Dufries at (404) 589-7226. If you have any questions concerning this report or any other compliance matter, contact Ms. Gale Williams at (404) 589-7223.

Very truly yours,

Cynthia C. Goodwin

Enclosures

# FEDERAL RESERVE BANK OF ATLANTA

**Cynthia C. Goodwin**  
ASSISTANT VICE PRESIDENT

March 7, 1997

Ms. Patricia Hartje  
Regional Compliance Manager  
Office of the Comptroller of the Currency  
Marquis One Tower, Suite 600  
245 Peachtree Center Avenue, N.E.  
Atlanta, Georgia 30303

Dear Ms. Hartje:

Enclosed for your information is a copy of the Community Reinvestment Act Performance Evaluation for AmSouth Bank of Walker County, Jasper, Alabama, as of October 7, 1996.

A copy of our letter of transmittal to the bank's board of directors is also enclosed.

Very truly yours,

Cynthia C. Goodwin

Enclosures

# FEDERAL RESERVE BANK OF ATLANTA

**Cynthia C. Goodwin**  
ASSISTANT VICE PRESIDENT

March 7, 1997

Mr. Joel Palmer  
Assistant Director II  
Regional Operations - Compliance  
Office of Thrift Supervision  
1475 Peachtree Street, N.E.  
Atlanta, Georgia 30309

Dear Mr. Palmer:

Enclosed for your information is a copy of the Community Reinvestment Act Performance Evaluation for AmSouth Bank of Walker County, Jasper, Alabama, as of October 7, 1996.

A copy of our letter of transmittal to the bank's board of directors is also enclosed.

Very truly yours,

Cynthia C. Goodwin

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# FEDERAL RESERVE BANK OF ATLANTA

**Cynthia C. Goodwin**  
ASSISTANT VICE PRESIDENT

March 7, 1997

Mr. Jimmy Loyless  
Regional Director  
Federal Deposit Insurance Corporation  
One Atlantic Center, Suite 1600  
1201 West Peachtree Street, N.E.  
Atlanta, Georgia 30309-3449

Dear Mr. Loyless:

Enclosed for your information is a copy of the Community Reinvestment Act Performance Evaluation for AmSouth Bank of Walker County, Jasper, Alabama, as of October 7, 1997.

A copy of our letter of transmittal to the bank's board of directors is also enclosed.

Very truly yours,

Cynthia C. Goodwin

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**PUBLIC DISCLOSURE**

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Name of Bank: AmSouth Bank of Walker County

City and State: Jasper, Alabama

Date of Examination: October 7, 1996

**FEDERAL RESERVE BANK OF ATLANTA**