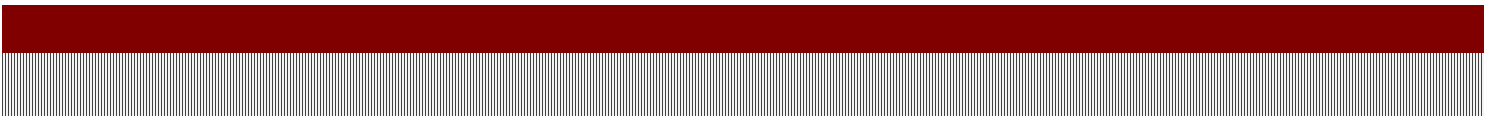




CRA Public File

COMMERCIAL BANK | MARCH 2024

Kim Campbell, VP Compliance and CRA Officer



PUBLIC FILE CONTENTS

Commercial Bank's Public File is updated no later than April 1st of each year. Kim Campbell, VP, Compliance & CRA Officer is primarily responsible for compiling Public File information and updating it annually. The Public File is located on the bank's Intranet and posted on the website. The bank has determined that the contents of the Public File is in compliance with CRA requirements as outlined below:

- ☒ Our most recent CRA Public Performance Evaluation.
- ☒ List of our branches, branches opened and closed in the current and each of the prior 2 calendar years and their street addresses and geographies.
- ☒ Map of each assessment area.
- ☒ Census Tracts.
- ☒ Home Mortgage Disclosure Act Notice.
- ☒ Loan-to-deposit ratio for each quarter of the prior calendar year.
- ☒ Quarterly report of our efforts to improve our CRA record, if applicable. (This requirement only applies when a bank receives a less than satisfactory CRA rating.)
- ☒ List of services (loan and deposit products and transaction fees generally offered and hours of operation of our branches), including a description of any material differences in the availability or cost of services among locations.
- ☒ Written comments received from the public relating to our CRA performance and responses to them for the current and preceding 2 calendar years.
- ☒ The Public File is posted on the banks intranet and website and the bank is prepared to provide copies of the Public File upon request.
- ☒ We do not charge for copies of our Public File.
- ☒ Our branches are capable of providing copies of the Public File within 5 calendar days of a request.

BANK CLASSIFICATION

Applying the January 1, 2024 CRA Definitions:

Small Bank	A bank or savings association that, as of December 31 of either of the prior 2 calendar years, had assets less than \$1.564 billion .	
Intermediate Small Bank	A bank or savings association with assets of at least \$391 million as of December 31 of both of the prior 2 calendar years and less than \$1.564 billion as of December 31 of either of the prior 2 calendar years.	✓
Large Bank	Banks or savings associations with assets of at least \$1.564 billion as of December 31 of both the prior 2 calendar years.	

As indicated above Commercial Bank meets the definition of a Intermediate Small Bank, as evidenced by our asset sizes shown below:

December 31, 2023	\$578,620,309	
December 31, 2022	\$613,249,483	
December 31, 2021	\$610,802,334	

Distribution of Branches

Commercial Bank has nine (9) full-service offices, all of which are located in our assessment area and one (1) loan production offices.

Commercial Bank's current CRA rating is SATISFACTORY based on our last evaluation on August 2, 2021

PUBLIC DISCLOSURE

August 2, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Commercial Bank
Certificate Number: 18584

301 North State Street
Alma, MI 48801

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

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

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.

TABLE OF CONTENTS

INSTITUTION RATING	1
DESCRIPTION OF INSTITUTION	1
DESCRIPTION OF ASSESSMENT AREAS	3
SCOPE OF EVALUATION	4
CONCLUSIONS ON PERFORMANCE CRITERIA	5
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	9
NON-MSA, MI AA – Full Scope Review	10
LANSING-EAST LANSING, MI MSA AA – Full Scope Review	19
GRAND RAPIDS-KENTWOOD, MI MSA AA – Full Scope Review	28
APPENDICES	36
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA	36
GLOSSARY	37

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, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, economic conditions, and assessment area (AA) credit needs.
- The institution made a majority of its loans within the AAs.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- There were no CRA-related complaints during the evaluation period, therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

The institution's community development performance demonstrates adequate responsiveness to community development needs in its AAs through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities in the institution's AAs.

DESCRIPTION OF INSTITUTION

Commercial Bank (CB) is a full-service bank headquartered in Alma, Michigan. The bank is a wholly owned subsidiary of Commercial National Financial Corporation (CNFC), a one-bank holding company headquartered in Ithaca, Michigan. CB wholly owns subsidiary CNFC Financial Services, Inc. which owns 50.0 percent of CNFC Title Agency. The bank received a "Satisfactory" rating at its previous FDIC CRA Performance Evaluation dated June 18, 2018, based on Interagency Intermediate Small Institution Examination Procedures.

In addition to its main office, CB operates nine full service branches within Gratiot, Montcalm, Barry, and Ingham Counties. CB additionally operates loan production offices in Mt. Pleasant, Michigan and Grand Rapids, Michigan. CB did not open or close any branches since the prior evaluation. The following table provides additional information on the branch locations.

Office Locations				
Address	City	County	ATM	Census Tract Income Level
301 North State Street	Alma	Gratiot	Yes	Middle
1690 Wright Avenue	Alma	Gratiot	Yes	Moderate
10530 West Carson City Road	Greenville	Montcalm	Yes	Moderate
629 West State Street	Hastings	Barry	Yes	Upper
101 North Pine Street	Ithaca	Gratiot	Yes	Middle
101 North Newton Street	Middleton	Gratiot	Yes	Middle
104 North Mill Street	St. Louis	Gratiot	Yes	Middle
2112 Jolly Road	Okemos	Ingham	Yes	Upper
661 North Cedar Street	Mason	Ingham	Yes	Middle
322 South Jefferson Street	Mason	Ingham	Yes	Middle

Source: Bank Records, 2015 ACS Data

The bank offers a variety of consumer and commercial services including checking and savings accounts and commercial, residential, and consumer loans. The bank's primary business focus remains residential real estate and commercial lending. The bank continues to offer Federal Housing Administration, Veterans Administration, Rural Development, Michigan State Housing Development Authority and the Federal Home Loan Bank Homeownership Opportunities Program. These home mortgage loans offer flexible underwriting standards and reduced down payment requirements and/or grants for down payment assistance. CB continues to offer Small Business Administration (SBA) and U.S. Department of Agriculture loans. These federal programs allow business loans with flexible terms that meet certain requirements. Alternate banking services include online banking with bill pay, automated teller machines (ATMs), mobile banking, telephone banking, and cash dispensing ATMs at each branch location.

According to the Call Report dated March 31, 2021, the bank had total assets of \$569.3 million, with total loans of \$444.8 million, total deposits of \$476.9 million and total securities of \$39.0 million. The net loan portfolio increased 14.4 percent since the prior evaluation, and the composition of the loan portfolio remained largely consistent over the review period. The following table illustrates the loan portfolio distribution as of March 31, 2021.

Loan Portfolio Distribution as of 03/31/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	10,173	2.3
Secured by Farmland	15,462	3.5
Secured by 1-4 Family Residential Properties	169,173	38.0
Secured by Multifamily (5 or more) Residential Properties	17,281	3.9
Secured by Nonfarm Nonresidential Properties	138,588	31.2
Total Real Estate Loans	350,677	78.9
Commercial and Industrial Loans	83,633	18.8
Agricultural Production and Other Loans to Farmers	1,707	0.4
Consumer Loans	6,827	1.5
Obligations of State and Political Subdivisions in the U.S.	1,966	0.4
Other Loans	27	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	444,837	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet AA needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its performance. CB maintains three AAs that include five counties in two separate metropolitan statistical areas (MSAs) and an area that is not located in any MSA. According to the U.S. Census data, the combined AAs include 129 tracts, of which 10 are low-income, 33 are moderate-income, 49 middle-income, 27 upper-income, and 10 with no designation. The AA includes Barry, Gratiot and Isabella Counties in the Non-MSA, MI AA, Ingham County in the Lansing-East Lansing, MI MSA AA, and Montcalm County in the Grand Rapids-Kentwood, MI MSA AA. Examiners present information about each AA in more detail later in this evaluation.

Since the previous evaluation, the Office of Management and Budget revised delineations for the MSAs nationwide, based on population statistics and other factors. Because of the changes, the Grand Rapids-Wyoming, MI MSA (24340) is now the Grand Rapids-Kentwood, MI MSA (24340). The changes include removing Barry County from the Grand Rapids-Kentwood, MI MSA so that it is not located in any MSA. Additionally, since the previous evaluation, the bank removed two middle-income tracts in Ionia County from its AA due to the branch closing in Lake Odessa (Ionia County) in July 2017.

The Federal Financial Institutions Examination Council (FFIEC) designated 10 middle-income tracts in Isabella County in the Non-MSA, MI AA as distressed during the review period due to poverty levels.

The AAs conform to CRA requirements, consist of whole geographies in which the bank has offices or operates, do not reflect illegal discrimination, and do not arbitrarily exclude any low-or moderate-income geographies.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation, dated June 18, 2018, to the current evaluation dated August 2, 2021. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate CB's CRA performance. These procedures include the Lending Test and the Community Development Test. The first Appendix to this evaluation discusses the performance criteria for these tests.

Examiners conducted full-scope reviews of all three AAs and placed the most weight on the Non-MSA, MI AA as the majority of lending and community development activities occurred in this AA.

Activities Reviewed

Examiners determined that the bank's major product lines are home mortgage and small business loans. This conclusion considered the number and dollar volume of loans originated during the evaluation period, the composition of the bank's loan portfolio, and the bank's business strategy. No other loan types, such as small farm or consumer loans, represent a major product line.

The bank experienced a significant increase in home mortgage and small business originations between 2019 and 2020. This is due to the home mortgage refinance boom and the bank's participation in the SBA Paycheck Protection Program (PPP) established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) which provided aid to businesses, self-employed workers, sole proprietors, non-profit organizations, and tribal businesses so they could continue paying their workers during the COVID-19 pandemic. While number and dollar volume of loans are presented, examiners emphasized performance by number of loans as it is a better indicator of the number of individuals and businesses served. Based on the number and volume of loans (excluding PPP loans), examiners placed greater emphasis on home mortgage lending activities in the overall conclusions.

Examiners considered all home mortgage loans reported on the bank's 2019 and 2020 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. CB originated 199 loans totaling \$31.7 million in 2019 and 334 loans totaling \$57.1 million in 2020. Given the inconsistencies in home mortgage lending due to refinance activity, this evaluation presents home mortgage activity for both 2019 and 2020.

Examiners used bank records to identify and analyze the universe of 2019 and 2020 small business loans. The bank originated 99 loans totaling \$24.3 million in 2019, and 525 loans totaling \$45.8 million in 2020. In 2020, the bank originated 427 PPP loans totaling \$26.9 million that did not have a community development purpose and thus were included in this evaluation as small business

loans. Given the inconsistencies in small business lending volume due to PPP loan activity, this evaluation presents small business activity for both 2019 and 2020.

Examiners compared home mortgage lending performance to 2019 aggregate HMDA data and demographic data obtained from the 2015 American Community Survey (ACS). Examiners place more weight on the bank's performance against aggregate HMDA data, as it is a better indicator of market demand and lending opportunities. D&B data for 2019 and 2020 provided a standard of comparison for small business loans.

For the Community Development Test, examiners considered all applicable community development loans, qualified investments, grants and donations, and community development services since the prior evaluation dated June 18, 2018.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, CB demonstrated reasonable performance under the Lending Test.

Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable given the institution's size, financial condition, and AA credit needs. The bank's LTD ratio, calculated from the Call report data, averaged 92.1 percent over the previous 12 quarters since the prior performance evaluation. The LTD ratio generally remained stable during the evaluation period and ranged from a low of 88.2 percent to a high of 97.2 percent. The bank's performance falls within the range of two similarly-situated institutions (SSIs) chosen based on loan portfolio, asset size and location.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 03/31/2021 (\$000s)	Average Net LTD Ratio (%)
Commercial Bank	569,253	92.1
Similarly-Situated Institution #1	435,666	72.1
Similarly-Situated Institution #2	683,412	95.0
Source: Reports of Condition and Income 06/30/2018 – 03/31/2021		

Assessment Area Concentration

As shown in the following table, CB originated a majority of its home mortgage and small business loans by number and dollar volume within the AAs during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	142	71.4	57	28.6	199	18,963	59.8	12,771	40.2	31,734
2020	242	72.5	92	27.5	334	37,074	64.9	20,011	35.1	57,085
Subtotal	384	72.0	149	28.0	533	56,037	63.1	32,782	36.9	88,819
Small Business										
2019	58	58.6	41	41.4	99	11,862	48.8	12,440	51.2	24,302
2020	353	67.2	172	32.8	525	27,077	59.2	18,688	40.8	45,765
Subtotal	411	65.9	213	34.1	624	38,939	55.6	31,128	44.4	70,067
Total	795	68.7	362	31.3	1,157	94,976	59.8	63,910	40.2	158,886
Source: Bank Data Due to rounding, totals may not equal 100.0%										

Geographic Distribution

Overall, the geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the AAs. Examiners analyzed and presented this criterion separately for each AA in subsequent sections of this evaluation.

Borrower Profile

Overall, the distribution of home mortgage and small business loans reflects reasonable penetration among individuals of different income levels and businesses of different sizes. Examiners analyzed and presented this criterion separately for each AA in the subsequent sections of this evaluation.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

Overall, the institution's community development performance demonstrates adequate responsiveness to the needs of the AAs through a blend of community development loans, qualified investments, and community development services, considering the institution's capacity and the availability of such opportunities within the AAs. The following sections present overall conclusions, and the separate AA discussions later in this evaluation contain additional details.

Community Development Loans

CB originated 110 community development loans totaling approximately \$13.1 million during the evaluation period. This level of activity represents 2.3 percent of total assets and 3.0 percent of net loans as of March 31, 2021.

As discussed earlier, the CARES Act created the PPP loan program in 2020 to provide assistance to businesses due to the economic crisis resulting from the pandemic. PPP loans that promoted job retention for low- and moderate-income persons and/or in low- and moderate-income census tracts may be considered community development loans. CB originated 103 PPP loans totaling \$11.2 million in 2020 and 2021 that are community development loans and are included in the table below. These loans are separate from the PPP loans considered in the Lending Test.

Excluding PPP loans, the bank extended seven community development loans totaling \$1.9 million representing 0.2 percent of total assets and 0.3 percent of net loans. The number of loans mirrors the bank's performance at the previous evaluation but reflects a decrease in dollar volume from \$5.4 million. The bank's performance was similar to two SSIs in number of loans originated, but significantly trailed dollar volume.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
06/18/2018-12/31/2018	0	0	0	0	0	0	2	498	2	498
2019	0	0	0	0	0	0	2	304	2	304
2020	0	0	0	0	0	0	28	6,822	28	6,822
YTD 2021	1	500	0	0	0	0	77	5,013	78	5,513
Total	1	500	0	0	0	0	109	12,637	110	13,137
Source: Bank Data										

Qualified Investments

As shown in the following table, the bank's qualified investments during the evaluation period, which include community development donations and grants, totaled \$15.5 million. The bank's qualified investments include four investments that benefit a broader, statewide area that includes the AA. Qualified investments additionally include investments in Minority Deposit Institutions (MDI), Community Development Financial Institutions (CDFI), and Low-Income Designation (LID) credit unions.

Qualified investments include the following investments made prior to the evaluation period but which remain on the bank's books: three investments totaling \$5.0 million in CRA funds that funded revitalization and affordable housing projects; one investment for \$500,000 in an organization that funds economic development; one \$250,000 investment in a local school district where the majority of students receive free or reduced lunch; and 18 investments totaling \$4.5 million in MDIs, CDFIs, and LIDs.

As shown in the table below, the bank made 14 qualified investments totaling \$5.2 million and 45 qualified donations totaling \$108,000. These activities include 2 investments totaling \$1.5 million in securities that support affordable housing and benefit the entire AA, one \$1.0 million investment in 2021 that supports affordable housing, and 11 investments totaling \$2.7 million in MDIs, CDFIs, and LIDs. Donations supported affordable housing, community services for low- and moderate-income individuals, economic development and revitalization or stabilization in the AAs. Two donations totaling \$500 benefitted multiple AAs.

CB's dollar volume of investments and donations increased since the last evaluation, which included \$9.5 million in qualified investments and donations. Total qualified investment activities represent approximately 2.7 percent of total assets and 40.1 percent of total securities as of March 31, 2021. The bank's performance is higher than the community development investment levels of two SSIs, chosen based on location and asset size.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	3	5,000	0	0	20	5,222	0	0	23	10,222
06/18/2018 – 12/31/2018	1	698	0	0	0	0	0	0	1	698
2019	1	762	0	0	5	1,245	0	0	6	2,007
2020	0	0	0	0	1	249	0	0	1	249
YTD 2021	1	1,000	0	0	5	1,245	0	0	6	2,245
Subtotal	6	7,460	0	0	31	7,961	0	0	37	15,421
Qualified Grants & Donations	4	36	35	53	3	4	3	15	45	108
Total	10	7,496	35	53	34	7,965	3	15	82	15,529
<i>Source: Bank Data</i>										

Community Development Services

The bank provided numerous community development services during the evaluation period including serving as board members and providing technical assistance to various community organizations serving within the AAs. The majority of community development services occur on a regular basis, and bank officers frequently serve in leadership positions in multiple organizations. As shown in the table below, the bank provided 49 instances of services to 16 organizations throughout the AAs during the evaluation period, with the majority of the services delivered in the Non-MSA, MI AA. Five services to two organizations benefitted both the Non-MSA, MI AA and the Lansing-East Lansing, MI AA. The discussions within the separate AAs later in this evaluation contain additional details.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
06/18/2018-12/31/2018	0	8	2	0	10
2019	0	10	3	0	13
2020	0	11	2	0	13
YTD 2021	0	11	2	0	13
Total	0	40	9	0	49
<i>Source: Bank Data</i>					

In addition to the qualified services in the table above, the bank holds Interest on Lawyers Trust Accounts. The interest earned on these accounts helps pay for legal services for low- and moderate-income individuals. During the review period, the bank maintained 14 accounts with total balances of \$1.1 million.

CB was responsive to the needs of its AAs during the COVID-19 pandemic and waived 291 fees totaling \$6,238. This includes 262 instances of waived late, overdraft, statement, and telephone transfer fees, which are particularly responsive to the needs of low-or moderate-income individuals. The bank also granted 448 loan deferrals requested by consumers due to hardships associated with the pandemic. Additionally, the bank provided resources and contact information on its website to increase awareness of assistance available to individuals impacted by the pandemic.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify evidence of discriminatory or other illegal credit practices inconsistent with helping meet community credit needs.

NON-MSA, MI AA – Full Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NON-MSA, MI AA

The AA consists of the entirety of Barry and Gratiot Counties and 13 census tracts in Isabella County. CB operates six full-service branches within this AA (five in Gratiot County and one in Barry County). As of June 30, 2020, 75.1 percent of the bank’s total deposits are from this area. The bank originated 70.1 percent of home mortgage loans and 66.9 percent of small business loans, by number, in this AA during the review period.

Economic and Demographic Data

The AA consists of 35 census tracts with the following income designations: 1 low-income, 2 moderate-income, 23 middle-income, 8 upper-income, and 1 tract with no income designation. A correctional facility is located in the tract with no income designation. As noted previously, the FFIEC designated 10 middle-income tracts in Isabella County as distressed during the review period due to poverty levels. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area Non-MSA, MI AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	2.9	5.7	65.7	22.9	2.9
Population by Geography	168,314	4.8	5.9	61.3	25.6	2.2
Housing Units by Geography	69,929	3.5	6.6	64.5	25.4	0.0
Owner-Occupied Units by Geography	43,261	0.1	3.4	67.3	29.3	0.0
Occupied Rental Units by Geography	17,644	11.2	14.6	57.5	16.6	0.0
Vacant Units by Geography	9,024	4.7	6.2	65.2	23.9	0.0
Businesses by Geography	8,481	3.3	7.0	64.3	25.4	0.1
Farms by Geography	709	0.3	1.4	75.2	23.1	0.0
Family Distribution by Income Level	39,015	19.9	18.4	21.8	40.0	0.0
Household Distribution by Income Level	60,905	25.2	16.3	18.3	40.2	0.0
Median Family Income Non-MSAs - MI		\$53,628	Median Housing Value			\$117,047
			Median Gross Rent			\$709
			Families Below Poverty Level			11.0%
Source: 2015 ACS and 2020 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 geographic distribution criterion compares the bank’s home mortgage lending to the distribution of owner-occupied housing units in the AA. According to 2015 ACS data, the AA contains 69,929 housing units, of which 61.9 percent are owner-occupied, 25.2 percent are rental units, and 12.9 percent are vacant.

According to 2020 D&B data, the AA contains 8,481 non-farm businesses with the following gross annual revenue (GAR) levels. Of these businesses, 87.5 percent operate from a single location and 64.9 percent have four or fewer employees.

- 82.1 percent have \$1.0 million or less
- 5.3 percent have more than \$1.0 million
- 12.6 percent have unknown revenues

The analysis of small business loans under the borrower profile criterion compares the distribution of lending by GAR level. D&B data from 2020 shows that the largest industries in the AA are services (36.6 percent); retail trade (13.9 percent); construction (8.5 percent); finance, insurance & real estate (7.5 percent); and agriculture, and forestry & fishing (7.7 percent). The largest employers in the AA include Bradford White Corp. (1,600), Spectrum Health Pennock (600), MidMichigan Medical Center (698), Central Michigan Correctional Facility (446), Masonic Pathways (426), and Greenville Tool and Die Company (120).

Examiners used the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table shows the income categories for this AA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
MI NA Median Family Income (99999)				
2019 (\$58,600)	<\$29,300	\$29,300 to <\$46,880	\$46,880 to <\$70,320	≥\$70,320
2020 (\$60,900)	<\$30,450	\$30,450 to <\$48,720	\$48,720 to <\$73,080	≥\$73,080
Source: FFIEC				

Examiners consider unemployment data when evaluating an institution's ability to lend within its AA. Data obtained from the U.S. Bureau of Labor Statistics shows that unemployment rates rose significantly in 2020 due to the COVID-19 pandemic. While unemployment levels in the AA are lower than national averages as of May 2021, they have not dropped to pre-pandemic levels. The following table illustrates relevant unemployment rates during the evaluation period.

Unemployment Rates			
Area	2019	2020	May 2021
	%	%	%
Gratiot County	4.3	8.0	5.6
Barry County	3.2	7.4	4.6
Isabella County	3.7	8.4	5.2
State	4.1	9.9	5.0
National Average	3.6	8.1	6.1
Source: Bureau of Labor Statistics			

Competition

There is a moderate level of competition for deposits within the AA. As of June 30, 2020, 11 FDIC-insured financial institutions operate 42 offices with \$2.3 billion in deposits in the AA. CB ranked third with 14.5 percent of total deposits. The top two institutions hold 52.5 percent of the total deposit market share.

There is a strong level of competition for home mortgage loans in the AA. CB faces competition from a number of national, regional, and local banks, credit unions, and non-bank lenders. Based on 2019 HMDA aggregate data, 298 HMDA-reporting lenders originated 7,029 home mortgage loans totaling \$971.6 million in the AA. CB ranked seventh with 2.2 percent of the market share. The top five lenders accounted for 28.0 percent of all originations by number.

There is a moderate level of competition for small business lending in the AA. While the bank is not required to collect or report CRA small business loan data and is not included in the following numbers, the data shows evidence of local demand for small business financing. In 2019, the most recent year for which data is available, 63 lenders originated 2,461 small business loans totaling \$145.5 million. The top three lenders accounted for 44.2 percent of all reported small business loans by number.

Community Contact

As part of the evaluation process, examiners contacted a nonprofit organization dedicated to affordable housing in the AA to discuss the area's credit and community development needs. This information helps determine the responsiveness of local financial institutions to those needs. It also shows the availability of credit and community development opportunities.

The contact stated that the area experienced economic decline associated with the COVID19 pandemic. The pandemic particularly impacted small businesses and resulted in some closings. There are still a number of people laid off in the area. The economy is improving; however, the COVID variant has slowed the recovery.

The contact identified affordable housing as an issue. A recent housing boom inflated home and building material prices, and decreased the availability of contractors for home repairs. The contact identified a need for financial literacy training in the area. Additionally, they would like to see banks offer very small loans to help consumers build credit.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that opportunities exist within the AA for affordable housing, financial literacy, small business financing, and small dollar consumer loans.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NON-MSA MI AA

LENDING TEST

Overall, CB's lending performance reflects reasonable responsiveness to the credit needs within the AA based on the geographic distribution and borrower profile criteria, given performance context and mitigating factors.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Reasonable performance in home mortgage and small business lending supports this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. The following table shows the distribution of home mortgage loans compared with the percentage of owner-occupied homes and 2019 HMDA aggregate data.

Geographic Distribution of Home Mortgage Loans Non-MSA, MI AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	0.1	0.2	0	0.0	0	0.0
2020	0.1	--	0	0.0	0	0.0
Moderate						
2019	3.4	3.3	7	6.7	911	6.8
2020	3.4	--	14	8.5	1,627	6.4
Middle						
2019	67.3	55.3	82	78.8	10,177	76.0
2020	67.3	--	121	73.3	18,319	72.0
Upper						
2019	29.3	41.3	15	14.4	2,306	17.2
2020	29.3	--	30	18.2	5,489	21.6
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	104	100.0	13,394	100.0
2020	100.0	--	165	100.0	25,435	100.0
Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

There is one low-income tract in the AA, containing only 0.1 percent of the owner-occupied housing units. While the bank did not make any loans in the low-income tract in the review period, this is reasonable given the lack of opportunity and demand. Lending in moderate-income tracts exceeded the aggregate performance of HMDA-reporting institutions in 2019 and the percent of owner-occupied housing units in both 2019 and 2020.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. The following table shows the distribution of small business loans within the AA, and includes comparative data for the distribution of businesses by tract income level.

Geographic Distribution of Small Business Loans Non-MSA, MI AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	3.3	0	0.0	0	0.0
2020	3.3	1	0.4	736	4.3
Moderate					
2019	7.1	4	10.5	1,363	17.6
2020	7.0	21	8.9	1,647	9.6
Middle					
2019	65.0	31	81.6	5,174	66.6
2020	64.3	197	83.1	13,843	80.7
Upper					
2019	24.6	3	7.9	1,228	15.8
2020	25.4	18	7.6	933	5.4
Not Available					
2019	0.1	--	--	--	--
2020	0.1	--	--	--	--
Totals					
2019	100.0	38	100.0	7,765	100.0
2020	100.0	237	100.0	17,159	100.0
Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

There is one low-income tract in the AA that contains 3.3 percent of AA businesses, which limits lending opportunities. The bank only originated one loan in the low-income tract in the review period, which is reasonable given the lack of lending opportunities. Lending in moderate-income tracts exceeded the percentage of businesses in both 2019 and 2020.

Borrower Profile

Overall, the distribution of loans to borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, given the greater weight placed on home mortgage lending.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among borrowers of different income levels. The following table shows the distribution of home mortgage loans by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level Non-MSA MI, AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	19.9	6.1	9	8.7	555	4.1
2020	19.9	--	6	3.6	462	1.8
Moderate						
2019	18.4	17.6	15	14.4	1,322	9.9
2020	18.4	--	24	14.5	2,447	9.6
Middle						
2019	21.8	23.7	25	24.0	2,491	18.6
2020	21.8	--	41	24.8	4,595	18.1
Upper						
2019	40.0	39.9	54	51.9	8,998	67.2
2020	40.0	--	93	56.4	16,351	64.3
Not Available						
2019	0.0	12.7	1	1.0	28	0.2
2020	0.0	--	1	0.6	1,580	6.2
Totals						
2019	100.0	100.0	104	100.0	13,394	100.0
2020	100.0	--	165	100.0	25,435	100.0
<i>Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

The level of lending to low-income borrowers trails the percentage of families in each year, but exceeded the aggregate performance of HMDA-reporting institutions in 2019. The percentage of loans to low-income borrowers decreased in 2020; however, ACS data shows that 11.0 percent of families in the AA had income below the poverty level. These families are unlikely to qualify and/or service debt in amounts sufficient to afford homes in the area. The bank's lending to moderate-

income borrowers slightly trails the aggregate HMDA data in 2019 and the percentage of moderate-income borrowers in both years, but examiners considered this reasonable.

Small Business Loans

The distribution of loans to businesses of different sizes is poor. The following table shows the distribution of small business loans within the AA, contrasted with the percentage of businesses at different GAR levels.

Distribution of Small Business Loans by Gross Annual Revenue Category Non-MSA, MI AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	81.2	26	68.4	3,577	46.1
2020	82.1	17	7.2	3,862	22.5
>\$1,000,000					
2019	5.7	10	26.3	3,923	50.0
2020	5.3	18	7.6	3,032	17.7
Revenue Not Available					
2019	13.1	2	5.3	265	3.4
2020	12.6	202	85.2	10,265	59.8
Totals					
2019	100.0	38	100.0	7,765	100.0
2020	100.0	237	100.0	17,159	100.0
<i>Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

A majority of the small business loans originated in 2020 were PPP loans (202 loans), for which the bank was not required to collect revenue data from the borrower. Excluding the PPP loans, 48.6 percent by number of small business loans originated in 2020 were to businesses with GARs of \$1.0 million or less. This is a significant decrease from 68.4 percent in 2019. Additionally, less than half of the loans originated in the review period were to the smallest businesses with GARs of \$250,000 or less. While the bank faces competition from multiple commercial lenders in the AA, overall, performance is considered poor.

COMMUNITY DEVELOPMENT TEST

The bank's community development performance demonstrates adequate responsiveness to the community development needs in this AA through its community development lending, qualified investments, and community development services.

Community Development Loans

The bank originated 45 community development loans totaling \$4.2 million during the evaluation period within this AA. Excluding PPP loans, the bank extended two loans totaling \$304,000 to a nonprofit organization to purchase a vacant / blighted building located in a moderate-income tract. The organization provides affordable housing options and increases home ownership rates for low-income families.

Community Development Lending – Non-MSA, MI AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
06/18/2018-12/31/2018	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	2	304	2	304
2020	0	0	0	0	0	0	15	1,410	15	1,410
YTD 2021	0	0	0	0	0	0	28	2,495	28	2,495
Total	0	0	0	0	0	0	45	4,209	45	4,209

Source: Bank Data

Qualified Investments

As noted in the overall conclusions, CB maintained three prior period investments totaling \$5.0 million in CRA funds that funded revitalization and affordable housing projects that benefit a broader, statewide area that includes the AA. Additionally, during the evaluation period, the bank made two investments totaling \$1.5 million in securities that support affordable housing and benefit all of the AAs. The bank also maintains a \$250,000 prior period investment in this AA in a local school district where the majority of students receive free or reduced cost lunch.

As shown in the following table, CB made 31 qualified grants and donations totaling \$53,000 within this AA during the review period.

Community Development Donations - Non-MSA, MI AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
06/18/2018-12/31/2018	1	1	5	7	0	0	0	0	6	8
2019	0	0	6	8	1	1	1	5	8	14
2020	0	0	7	10	0	0	1	5	8	15
YTD 2021	0	0	8	11	0	0	1	5	9	16
Total	1	1	26	36	1	1	3	15	31	53

Source: Bank Data

Notable examples include:

- \$15,000 to an organization to revive a stalled development in a moderate-income tract
- \$6,000 to a non-profit organization that provides medical, dental, pharmaceutical, and/or mental health services at little or no cost to uninsured and underinsured people
- \$16,590 to provide materials to teach financial literacy in schools where the majority of students receive free or reduced cost lunch

Community Development Services

During the evaluation period, bank officers and staff provided 37 instances of financial expertise or technical assistance services to 10 community development-related organizations within this AA.

Community Development Services – Non-MSA, MI AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
06/18/2018-12/31/2018	0	8	1	0	9
2019	0	9	1	0	10
2020	0	8	1	0	9
YTD 2021	0	8	1	0	9
Total	0	33	4	0	37
<i>Source: Bank Data</i>					

Notable examples include:

- A bank officer serves on the Board Finance Committee for an organization that provides affordable housing to residents of Clinton and Gratiot Counties
- A bank officer serves on the Board Advisory Committee of an organization that provides financial literacy classes to students at schools where over half of the students receive free or reduced cost lunch.
- A bank officer serves on the Board of an organization that provides financial and medical assistance to low- and moderate-income individuals.

LANSING-EAST LANSING, MI MSA AA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN LANSING-EAST LANSING, MI MSA AA

This AA consists of the entirety of Ingham County. The bank operates three full-service branches within this AA. As of June 30, 2020, 18.4 percent of the bank's total deposits are from this area. The bank originated 17.2 percent of its home mortgage loans and 18.4 percent of small business loans, by number, in this AA during the review period.

Economic and Demographic Data

The AA consists of 81 census tracts with the following income designations: 9 low-income, 21 moderate-income, 23 middle income, 19 upper-income, and 9 tracts with no income designation. The tracts with no income designation are primarily comprised of Michigan State University locations. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area Lansing-East Lansing, MI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	11.1	25.9	28.4	23.5	11.1
Population by Geography	283,491	9.1	25.4	28.8	29.9	6.8
Housing Units by Geography	121,722	11.0	27.9	29.7	30.2	1.2
Owner-Occupied Units by Geography	63,828	4.3	24.7	35.5	35.3	0.2
Occupied Rental Units by Geography	46,590	17.8	30.9	23.0	25.8	2.5
Vacant Units by Geography	11,304	20.7	33.7	24.8	19.5	1.3
Businesses by Geography	19,066	10.9	24.3	23.6	36.7	4.5
Farms by Geography	591	4.7	13.7	43.0	36.5	2.0
Family Distribution by Income Level	60,967	24.9	17.6	18.8	38.7	0.0
Household Distribution by Income Level	110,418	28.7	16.0	17.3	38.0	0.0
Median Family Income MSA - 29620 Lansing-East Lansing, MI MSA		\$63,978	Median Housing Value			\$118,840
			Median Gross Rent			\$797
			Families Below Poverty Level			13.8%
Source: 2015 ACS and 2020 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 geographic distribution criterion compares the bank's home mortgage lending to the distribution of owner-occupied housing units in the AA. According to 2015 ACS data, the AA contains 121,722 housing units, of which 52.4 percent are owner-occupied, 38.3 percent are rental units, and 9.3 percent are vacant.

According to 2020 D&B data, the AA contains 19,066 non-farm businesses with the following GAR levels. Of these businesses, 85.9 percent operate from a single location and 61.1 percent have four or fewer employees.

- 81.4 Percent have \$1.0 million or less
- 5.7 Percent have more than \$1.0 million
- 12.9 Percent have unknown revenues

The analysis of small business loans under the borrower profile criterion compares the distribution of lending by GAR level. D&B data from 2020 shows that the largest industries in the AA are services (43.7 percent); retail trade (11.7 percent); finance, insurance & real estate (10.3 percent); and construction (5.0 percent). According to Moody's February 2021 data, the largest employers within the MSA are Michigan State University (12,781), Liberty National Life Insurance (10,000), Sparrow Health System (7,600), General Motors Corp. (4,549), and Auto Owners Insurance (3,700).

Examiners used the FFIEC-updated median family income to analyze home mortgage loans under the Borrower Profile criterion. The following table shows the income categories for the AA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Lansing-East Lansing, MI MSA Median Family Income (29620)				
2019 (\$72,800)	<\$36,400	\$36,400 to <\$58,240	\$58,240 to <\$87,360	≥\$87,360
2020 (\$79,300)	<\$39,650	\$39,650 to <\$63,440	\$63,440 to <\$95,160	≥\$95,160
<i>Source: FFIEC</i>				

Examiners consider unemployment data when evaluating an institution's ability to lend within its AA. As previously noted, in 2020, the COVID-19 pandemic caused a significant increase in unemployment. As shown in the following table, unemployment rates were consistently lower than the national averages, but have not dropped to pre-pandemic levels.

Unemployment Rates			
Area	2019	2020	May 2021
	%	%	%
Ingham County	3.4	7.5	5.9
State	4.1	9.9	5.0
National Average	3.6	8.1	6.1
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a moderate level of competition for deposits within the AA. As of June 30, 2020, 18 FDIC-insured institutions operated 64 offices with \$6.3 billion in deposits in the AA. The bank

ranked fourteenth with 1.3 percent of total deposits. The top four institutions hold 54.6 percent of the deposit market share.

There is a strong level of competition for home mortgages in the AA. Bank competitors include national, regional, and local banks, credit unions, and non-bank lenders. Based on 2019 HMDA aggregate data, 345 HMDA-reporting lenders originated 11,983 home mortgage loans totaling \$1.7 billion in the AA. The bank ranked 52nd with a 0.3 percent market share. The top 10 lenders accounted for 54.6 percent of all originations by number.

There is a moderate level of competition for small business lending in the AA. While the bank is not required to collect or report CRA small business loan data and is not included in the following numbers, the data shows evidence of local demand for small business financing. In 2019, the most recent year for which data is available, 73 lenders originated 4,009 small business loans totaling \$183.2 million. The top three lenders accounted for 45.1 percent of all reported small business loans by number.

Community Contact

Examiners referred to a previously completed contact with a representative of a nonprofit dedicated to affordable housing in the AA to discuss the area's credit and community development needs. This information helps determine the responsiveness of local financial institutions to those needs. It also shows the availability of credit and community development opportunities.

The contact stated that overall economic conditions in the area were stable prior to COVID-19, however the area experienced economic decline associated with the pandemic. The contact recognized MSU and the health industry as leading economic drivers of the AA. The contact identified affordable housing and financial literacy as needs. While the contact believed that local financial institutions are meeting the credit needs in the area, additional collaborations on the economic needs of the residents would further benefit the AA.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that opportunities exist for affordable housing, financial literacy, and small business lending within the AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN LANSING-EAST LANSING, MI MSA AA

LENDING TEST

CB's lending performance reflects reasonable responsiveness to the credit needs within the AA, based on the geographic distribution and borrower profile criteria, given performance context and mitigating factors. As previously noted, home mortgage lending received more weight in the overall conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA based on reasonable performance for both home mortgage and small business lending during the evaluation period.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. The following table shows the distribution of home mortgage loans compared with the percentage of owner-occupied homes and 2019 HMDA aggregate data.

Geographic Distribution of Home Mortgage Loans Lansing-East Lansing, MI MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	4.3	3.9	2	8.0	188	5.9
2020	4.3	--	1	2.4	88	1.5
Moderate						
2019	24.7	21.6	4	16.0	442	14.0
2020	24.7	--	8	19.5	647	10.9
Middle						
2019	35.5	35.7	13	52.0	1,562	49.4
2020	35.5	--	16	39.0	2,238	37.8
Upper						
2019	35.3	38.5	6	24.0	973	30.7
2020	35.3	--	16	39.0	2,944	49.8
Not Available						
2019	0.2	0.4	0	0.0	0	0.0
2020	0.2	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	25	100.0	3,165	100.0
2020	100.0	--	41	100.0	5,917	100.0
Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

The bank's lending in low-income tracts exceeded both the percentage of owner-occupied housing and aggregate HMDA data in 2019, and trailed the percentage of owner-occupied housing in 2020. Lending in moderate-income tracts trailed both the percentage of owner-occupied housing units and the aggregate HMDA data in the review period; however, the bank increased home mortgage lending in 2020. Additionally, as previously mentioned, many competing lenders also serve the AA. Examiners considered the bank's performance reasonable.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. The following table shows the distribution of small business loans within the AA and includes comparative data for the distribution of businesses by tract income level.

Geographic Distribution of Small Business Loans Lansing-East Lansing, MI MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	11.5	1	9.1	114	5.4
2020	10.9	3	4.2	183	2.8
Moderate					
2019	24.7	2	18.2	422	20.0
2020	24.3	8	11.1	1,022	15.6
Middle					
2019	23.8	3	27.3	394	18.7
2020	23.6	23	31.9	2,230	34.1
Upper					
2019	35.4	5	45.5	1,176	55.9
2020	36.7	38	52.8	3,103	47.5
Not Available					
2019	4.6	--	--	--	--
2020	4.5	--	--	--	--
Totals					
2019	100.0	11	100.0	2,106	100.0
2020	100.0	72	100.0	6,538	100.0
<i>Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

In 2019, the bank's lending slightly trailed the percentage of small businesses in low- and moderate-income tracts. In 2020, while the number of loans increased, the bank's lending trailed the percentage of small businesses in low- and moderate-income tracts. Overall, performance is considered reasonable.

Borrower Profile

The distribution of loans reflects reasonable penetration among individuals of different income levels and businesses of different sizes. Examiners focused on the percentages by number of home mortgages to low- and moderate-income individuals and loans to businesses with GARs of \$1 million or less.

Home Mortgage Loans

Overall, the distribution of borrowers reflects reasonable penetration among borrowers of different income levels. The following table shows the distribution of home mortgage loans by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level Lansing-East Lansing, MI MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	24.9	10.0	0	0.0	0	0.0
2020	24.9	--	1	2.4	80	1.3
Moderate						
2019	17.6	22.3	3	12.0	279	8.8
2020	17.6	--	12	29.3	1,225	20.7
Middle						
2019	18.9	22.7	8	32.0	1,082	34.2
2020	18.9	--	12	29.3	1,642	27.7
Upper						
2019	38.7	35.4	11	44.0	1,198	37.8
2020	38.7	--	15	36.6	2,771	46.8
Not Available						
2019	0.0	9.6	3	12.0	607	19.2
2020	0.0	--	1	2.4	200	3.4
Totals						
2019	100.0	100.0	25	100.0	3,165	100.0
2020	100.0	--	41	100.0	5,917	100.0

Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

In 2019, the bank did not make any loans to low-income borrowers, and performance trailed aggregate HMDA data in 2019 and the percentage of low-income families in both years presented. This category includes approximately 13.8 percent of families in the AA who have incomes below the poverty level. These families likely face difficulty in qualifying for and/or servicing debt in amounts sufficient to finance homes in the AA. Lending to moderate-income borrowers trailed both aggregate HMDA data and the percentage of moderate-income families in 2019. Data in 2020 showed significant improvement, and lending to moderate-income borrowers exceeded the percentage of moderate-income families. The 2015 ACS data shows that 77.1 percent of families in low-income tracts and 62.6 percent of families in moderate-income tracts are low- and moderate-income. CB faces significant competition from national and regional financial institutions with locations in the low- and moderate-income tracts. Therefore, examiners considered the bank's performance to be reasonable.

Small Business Loans

The distribution of loans to businesses of different sizes is poor. The following table shows the distribution of small business loans within the AA, contrasted with the percentage of businesses at different GAR levels.

Distribution of Small Business Loans by Gross Annual Revenue Category Lansing-East Lansing, MI MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	79.4	6	54.5	1,638	77.8
2020	81.3	4	5.6	569	8.7
>\$1,000,000					
2019	6.6	4	36.4	308	14.6
2020	5.7	9	12.5	1,223	18.7
Revenue Not Available					
2019	14.1	1	9.1	160	7.6
2020	12.9	59	81.9	4,746	72.6
Totals					
2019	100.0	11	100.0	2,106	100.0
2020	100.0	72	100.0	6,538	100.0
<i>Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

A majority of the small business loans originated in 2020 were PPP loans, for which the bank was not required to collect revenue data from the borrower. Excluding the PPP loans, 30.8 percent, by number, of small business loans originated in 2020 were to businesses with GARs of \$1.0 million or less. Additionally, approximately 30.0 percent of the loans originated in the review period were to the smallest businesses with GARs of \$250,000 or less. While the bank faces competition from multiple commercial lenders in the AA, overall, performance is considered poor.

COMMUNITY DEVELOPMENT TEST

The bank's community development activities demonstrate adequate responsiveness to the needs of this AA. Examiners considered the institution's capacity, the need and availability of such opportunities, and information provided by the community contact.

Community Development Loans

The bank originated 24 community development loans totaling \$6.5 million in this AA during the evaluation period. Excluding PPP loans, the bank extended four loans totaling \$1.2 million.

Community Development Lending – Lansing-East Lansing, MI MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
06/18/2018-12/31/2018	0	0	0	0	0	0	1	100	1	100
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	8	4,693	8	4,693
YTD 2021	1	500	0	0	0	0	14	1,251	15	1,751
Total	1	500	0	0	0	0	23	6,044	24	6,544
<i>Source: Bank Data</i>										

Notable examples include:

- \$500,000 loan to assist with working capital needs to a Community Housing Development Organization which addresses the housing needs of underserved low-and moderate-income individuals, combats community deterioration, and provides safe, decent, and sanitary housing.
- Two SBA loans totaling \$594,000 to purchase and to refurbish a vacant storefront and retain 10 employees in a moderate-income tract.
- \$100,000 loan to purchase and refurbish a vacant property in a moderate-income tract and create new jobs.

Qualified Investments

As noted in the overall conclusions, CB has multiple investments that benefit the entire AA or benefit a broader statewide area that includes the AA. During the evaluation period, CB invested \$1.0 million in a bond for multi-family affordable housing in this AA.

As shown in the following table, CB made seven donations totaling \$48,000 in this AA during the review period.

Community Development Donations – Lansing-East Lansing, MI MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
06/18/2018-12/31/2018	2	31	2	11	0	0	0	0	4	42
2019	1	5	2	1	0	0	0	0	3	6
2020	0	0	0	0	0	0	0	0	0	0
YTD 2021	0	0	0	0	0	0	0	0	0	0
Total	3	36	4	12	0	0	0	0	7	48
<i>Source: Bank Data</i>										

Notable examples include:

- \$35,000 to an organization that builds and rehabilitates affordable multi- and single-family homes, delivers homeownership education, financial literacy and community engagement programs, provides emergency assistance and revitalized neighborhoods.
- \$10,000 to a non-profit organization that provides services targeted to low- and moderate-income individuals including counseling and education to renters, home buyers, home owners and seniors.

Community Development Services

During the evaluation period, bank officers and staff provided seven instances of financial expertise or technical assistance services to five community development-related organizations in this AA.

Community Development Services – Lansing-East Lansing, MI MSA AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
06/18/2018-12/31/2018	0	0	0	0	0
2019	0	1	0	0	1
2020	0	3	0	0	3
YTD 2021	0	3	0	0	3
Total	0	7	0	0	7
<i>Source: Bank Data</i>					

Notable examples include:

- A bank officer participated in a financial literacy program at a local high school in which the majority of students receive free or reduced cost lunch.
- A bank officer served as an instructor for home buyer education classes targeted to low- and moderate-income individuals.
- A bank officer serves on the Board of an organization that provides financial literacy classes to students at schools where over half of the students receive free or reduced cost lunch.

GRAND RAPIDS-KENTWOOD, MI MSA AA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GRAND RAPIDS-KENTWOOD, MI MSA AA

The AA consists of the entirety of Montcalm County. CB operates one full-service branch within this AA. As of June 30, 2020, 6.6 percent of the bank's total deposits are from this area. The bank originated 12.8 percent of its home mortgage loans and 12.9 percent of its small business loans, by number, in this AA during the review period.

Economic and Demographic Data

The Grand Rapids-Kentwood, MI MSA AA consists of 13 census tracts with the following income designations: 10 moderate-income and 3 middle-income. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area Grand Rapids-Kentwood, MI MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	76.9	23.1	0.0	0.0
Population by Geography	63,004	0.0	71.7	28.3	0.0	0.0
Housing Units by Geography	28,127	0.0	71.6	28.4	0.0	0.0
Owner-Occupied Units by Geography	18,408	0.0	72.0	28.0	0.0	0.0
Occupied Rental Units by Geography	4,876	0.0	68.5	31.5	0.0	0.0
Vacant Units by Geography	4,843	0.0	73.1	26.9	0.0	0.0
Businesses by Geography	3,034	0.0	68.7	31.3	0.0	0.0
Farms by Geography	261	0.0	75.9	24.1	0.0	0.0
Family Distribution by Income Level	16,261	28.7	24.2	23.9	23.1	0.0
Household Distribution by Income Level	23,284	30.5	21.0	20.8	27.7	0.0
Median Family Income MSA - 24340 Grand Rapids-Kentwood, MI MSA		\$64,496	Median Housing Value			\$94,042
			Median Gross Rent			\$694
			Families Below Poverty Level			12.8%
Source: 2015 ACS and 2020 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 Geographic Distribution criterion compares the bank's home mortgage lending to the distribution of owner-occupied housing units in the AA. According to 2015 ACS data, the AA contains 28,127 housing units, of which 65.5 percent are owner-occupied, 17.3 percent are rental, and 17.2 percent are vacant.

According to 2020 D&B data, the AA contains 3,034 non-farm businesses with the following GAR levels. Of these businesses, 88.0 percent operate from a single location and 66.2 percent have four or fewer employees.

- 82.5 percent have \$1.0 million or less
- 4.5 percent have more than \$1.0 million
- 13.0 percent have unknown revenues

The analysis of small business loans under the borrower profile criterion compares the distribution of lending by GAR level. D&B data from 2020 shows that the largest industries in the AA are services (35.8 percent); retail trade (15.3 percent); construction (8.3 percent); finance, insurance & real estate (6.0 percent); and transportation, communication (5.2 percent). According to The Right Place, Inc., in 2020, the largest employers in Montcalm County were Spectrum Health United & Kelsey Hospitals (800), Sparrow Carson Hospital (450), Dicastal North America, Inc. (450), and Federal-Mogul Corporation (370).

Examiners used the FFIEC-updated median family income to analyze home mortgage loans under the Borrower Profile criterion. The following table shows the income categories for this AA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Grand Rapids-Kentwood, MI MSA Median Family Income (24340)				
2019 (\$70,500)	<\$35,250	\$35,250 to <\$56,400	\$56,400 to <\$84,600	≥\$84,600
2020 (\$73,900)	<\$36,950	\$36,950 to <\$59,120	\$59,120 to <\$88,680	≥\$88,680
<i>Source: FFIEC</i>				

Examiners consider unemployment data when evaluating an institution's ability to lend within its AA. As mentioned previously, unemployment rates rose significantly in 2020 due to the COVID-19 pandemic. While unemployment levels are lower than national averages as of May 2021, they have not dropped to pre-pandemic levels. The following table illustrates relevant unemployment rates during the evaluation period.

Unemployment Rates			
Area	2019	2020	May 2021
	%	%	%
Montcalm County	4.0	9.1	5.7
State	4.1	9.9	5.0
National Average	3.6	8.1	6.1
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a moderate level of competition for deposits within the AA. As of June 30, 2020, eight FDIC-insured financial institutions operated 20 offices with \$772.7 million in deposits in the AA. CB ranked eighth with 3.8 percent of total deposits. The top two institutions hold 50 percent of the market share.

There is strong level of competition for home mortgage loans in the AA. CB faces competition from a number of national, regional, and local banks, credit unions, and non-bank lenders. Based on 2019 HMDA aggregate data, 217 HMDA-reporting lenders originated 3,405 home mortgage loans totaling \$400.9 million in the AA. CB ranked 40th with 0.7 percent of market share. The top five lenders account for 23.2 percent of originations by number of loans.

There is a moderate level of competition for small business lending in the AA. While the bank is not required to collect or report CRA small business loan data and is not included in the following numbers, the data shows evidence of local demand for small business financing. In 2019, the most recent year for which data is available, 40 lenders originated 645 small business loans totaling \$31.6 million. The top five lenders accounted for 56.4 percent of all reported small business loans by number of loans.

Community Contact

Examiners contacted a representative of a local community foundation in Montcalm County to discuss the area's credit and community development needs. This information helps determine the responsiveness of local financial institutions to those needs. It also shows the availability of credit and community development opportunities.

The contact stated that overall economic conditions in the area were stable and improving prior to COVID-19; however, the area experienced economic decline associated with the pandemic. The pandemic particularly impacted small businesses. While the economy is improving, businesses are having difficulty finding employees.

The contact identified affordable housing as an issue. The area has experienced an influx of people "priced out of the market" in larger metropolitan areas who are seeking less costly housing in the AA. This has had a detrimental impact on the availability of affordable housing in the area.

Credit and Community Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that affordable housing and small business loans represent the primary needs of the AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GRAND RAPIDS-KENTWOOD, MI MSA AA

LENDING TEST

CB's lending performance reflects reasonable responsiveness to the credit needs within the AA, based on the geographic distribution and borrower profile criteria, given performance context and mitigating factors.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA based on reasonable performance for home mortgage lending and reasonable performance for small business lending during the evaluation period.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. As shown in the following table, the bank's lending in moderate-income tracts based on the number of loans exceeded the HMDA aggregate data in 2019 as well as the percent of owner-occupied housing units in both 2019 and 2020.

Geographic Distribution of Home Mortgage Loans Grand Rapids-Kentwood, MI MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate						
2019	72.0	66.6	10	76.9	1,872	77.9
2020	72.0	--	27	75.0	4,157	72.6
Middle						
2019	28.0	33.4	3	23.1	532	22.1
2020	28.0	--	9	25.0	1,565	27.4
Totals						
2019	100.0	100.0	13	100.0	2,404	100.0
2020	100.0	--	36	100.0	5,722	100.0
Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

Overall, the geographic distribution of small business loans reflects reasonable dispersion throughout the AA. As shown in the following table, bank performance trailed the percentage of businesses in moderate-income tracts in 2019, but matched the percentage of businesses in moderate-income tracts in 2020.

Geographic Distribution of Small Business Loans Grand Rapids-Kentwood, MI MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate					
2019	69.1	4	44.4	1,749	87.8
2020	68.7	30	68.2	2,001	59.2
Middle					
2019	30.9	5	55.6	243	12.7
2020	31.3	14	31.8	1,379	40.8
Totals					
2019	100.0	9	100.0	1,992	100.0
2020	100.0	44	100.0	3,380	100.0
Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

Borrower Profile

The distribution of lending reflects reasonable penetration among borrowers of different income levels and businesses of different sizes. Examiners focused on the percentages by number of home mortgage loans to low- and moderate-income borrowers and loans to businesses with GARs of \$1.0 million or less.

Home Mortgage Loans

The distribution of loans reflects reasonable penetration among individuals of different income levels, including low- and moderate-income borrowers. The following table shows the distribution of home mortgage loans compared with the percentages of owner-occupied homes and HMDA aggregate lending data.

Distribution of Home Mortgage Loans by Borrower Income Level Grand Rapids-Kentwood, MI MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	28.7	14.5	1	7.7	49	2.0
2020	28.7	--	3	8.3	208	3.6
Moderate						
2019	24.2	28.7	2	15.4	242	10.0
2020	24.2	--	6	16.7	666	11.6
Middle						
2019	23.9	23.3	3	23.1	389	16.2
2020	23.9	--	11	30.6	1,959	34.2
Upper						
2019	23.1	21.0	7	53.8	1,725	71.7
2020	23.1	--	15	41.7	2,822	49.3
Not Available						
2019	0.0	12.5	0	0.0	0	0.0
2020	0.0	--	1	2.8	68	1.2
Totals						
2019	100.0	100.0	13	100.0	2,404	100.0
2020	100.0	--	36	100.0	5,722	100.0
Source: 2015 ACS; Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

The bank's lending activities to both low- and moderate-income borrowers trails the aggregate HMDA data in 2019 and the percentages of families in both years. Examiners considered the bank's performance reasonable because the bank has only one branch in this AA and faces a strong level of competition for home mortgage loans.

With regard to lending to low-income borrowers, approximately 12.8 percent of the families in the AA families have incomes below the poverty level. These families, who are included in the low-income category, likely face difficulty in qualifying for and/or servicing debt in amounts sufficient to finance homes in the AA.

Small Business Loans

The distribution of loans to businesses of different sizes is reasonable. The following table shows the distribution of small business loans within the AA, contrasted to the percentage of businesses at different GAR levels.

Distribution of Small Business Loans by Gross Annual Revenue Category Grand Rapids-Kentwood, MI MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	81.6	4	44.4	769	38.6
2020	82.5	7	15.9	1,047	31.0
>\$1,000,000					
2019	4.9	5	55.6	1,223	61.4
2020	4.5	3	6.8	89	2.6
Revenue Not Available					
2019	13.5	0	0.0	0	0.0
2020	13.0	34	77.3	2,244	66.4
Totals					
2019	100.0	9	100.0	1,992	100.0
2020	100.0	44	100.0	3,380	100.0
Source: 2019 & 2020 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

A majority of the small business loans originated in 2020 were PPP loans, for which the bank was not required to collect revenue data from the borrower. Excluding the PPP loans, 70.0 percent by number of small business loans originated in 2020 were to businesses with GARs of \$1.0 million or less. This is a significant increase from 44.4 percent in 2019. Additionally, approximately 54.5 percent of small business loans originated in the review period were to the smallest businesses with GARs of \$250,000 or less.

COMMUNITY DEVELOPMENT TEST

The bank's community development performance demonstrates adequate responsiveness to the community development needs in this AA through its community development loans, qualified investments, and community development services.

Community Development Loans

The bank originated 41 community development loans totaling \$2.4 million in this AA during the evaluation period. Excluding PPP loans, the bank extended one loan for \$397,987 for the acquisition and construction of sanitary and storm sewer improvements in a moderate-income census tract to support a new industrial park that will provide employment for 33 individuals.

Community Development Lending – Grand Rapids-Kentwood, MI MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
06/18/2018-12/31/2018	0	0	0	0	0	0	1	398	1	398
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	5	719	5	719
YTD 2021	0	0	0	0	0	0	35	1,267	35	1,267
Total	0	0	0	0	0	0	41	2,384	41	2,384
<i>Source: Bank Data</i>										

Qualified Investments

As noted in the overall conclusions, CB has multiple investments that benefit all of the AAs combined or benefit a broader statewide area that includes the AA.

CB made five donations totaling \$8,000 in this AA during the review period. This includes three donations totaling \$5,000 to an organization that provides financial literacy classes in schools where the majority of students receive free or reduced cost lunches. The donations also included two totaling \$3,000 to an organization that supports economic development in this AA.

Community Development Services

The bank did not provide any community development services within this AA during the review period.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

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.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

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.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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).

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 (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., 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 Loans: Includes closed-end mortgage loans or open-end lines of credit as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

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 (e.g., 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

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 (also known as **non-MSA**): 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.

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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 Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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.

2024 OFFICES AND HOURS**CENSUS TRACT****ALMA - Wright Ave.****0005.00**

1690 Wright Ave
Alma, MI 48801
Gratiot County
989-463-3901

LOBBY**Monday - Friday: 8:30 am - 5:30 pm****DRIVE-THRU****Monday - Friday: 8:30 am - 5:30 pm****Saturday 9:00 am - 12:00 pm****GREENVILLE****9712.00**

10530 W. Carson City Rd.
Greenville, MI 48838
Montcalm County
616-754-7166

Monday - Thursday: 8:30 am - 4:30 pm**Friday 8:30 am - 5:00 pm****DRIVE-THRU****Monday - Thursday: 8:30 am - 5:00 pm****Friday 8:30 am - 5:30 pm****Saturday 9:00 am - 12:00 pm****HASTINGS****0114.02**

629 W. State St.
Hastings, MI 49058
Barry County
269-945-9561 / 800-267-3830

LOBBY**Monday - Thursday: 8:30 am - 4:30 pm****Friday 8:30 am - 5:00 pm****DRIVE-THRU****Monday - Thursday: 8:30 am - 5:00 pm****Friday 8:30 am - 5:30 pm****Saturday 9:00 am - 12:00 pm****ITHACA****0010.00**

101 N. Pine River
Ithaca, MI 48847
Gratiot County
989-875-4144 / 800-547-8531

Monday - Thursday: 8:30 am - 4:30 pm**Friday 8:30 am - 5:00 pm****DRIVE-THRU****Monday - Thursday: 8:30 am - 5:00 pm****Friday: 8:30 am - 5:30 pm****Saturday: 9:00 am - 12:00 pm****MIDDLETON****0008.00**

101 N. Newton St.
Middleton, MI 48856
Gratiot County
989-236-7236

Monday - Friday: 8:30 am - 5:00 pm**DRIVE-THRU****Monday - Friday: 8:30 am - 5:00 pm****Saturday 9:00 am - 12:00 pm**

2024 OFFICES AND HOURS (continued)**CENSUS TRACT****SAINT LOUIS****0003.00**

104 N. Mill St.
St. Louis, MI 48880
Gratiot County
989-681-5738

LOBBY

Monday - Friday: 8:30 am - 5:00 pm

DRIVE-THRU

Monday - Friday: 8:30 am - 5:00 pm

Saturday: 9:00 am - 12:00 pm

MASON - Jefferson St.**0063.01**

322. S. Jefferson Street
Mason, MI 48854
Ingham County
517-676-0500

LOBBY

Monday - Thursday: 8:30 am - 4:30 pm

Friday: 8:30 am - 5:00 pm

DRIVE-THRU

Monday - Friday: 8:30 am - 5:00 pm

Saturday: 9:00 am - 12:00 pm

MASON - Cedar St.**0063.01**

661 N. Cedar Street
Mason, MI 48854
Ingham County
517-676-0515

Monday - Friday: 8:30 am - 5:00 pm

DRIVE-THRU

Monday - Thursday: 8:30 am - 5:00 pm

Friday: 8:30 am - 5:30 pm

OKEMOS**0050.03**

2112 Jolly Rd.
Okemos, MI 48864
Ingham County
517-337-5000

Monday - Thursday: 8:30 am - 4:30 pm

Friday: 8:30 am - 5:00 pm

DRIVE-THRU

Monday - Friday: 8:30 am - 5:00 pm

ALMA - State St. - LPO, Safe Deposit Boxes and ATM**0006.00**

301 N. State St.
Gratiot County
989-463-2185

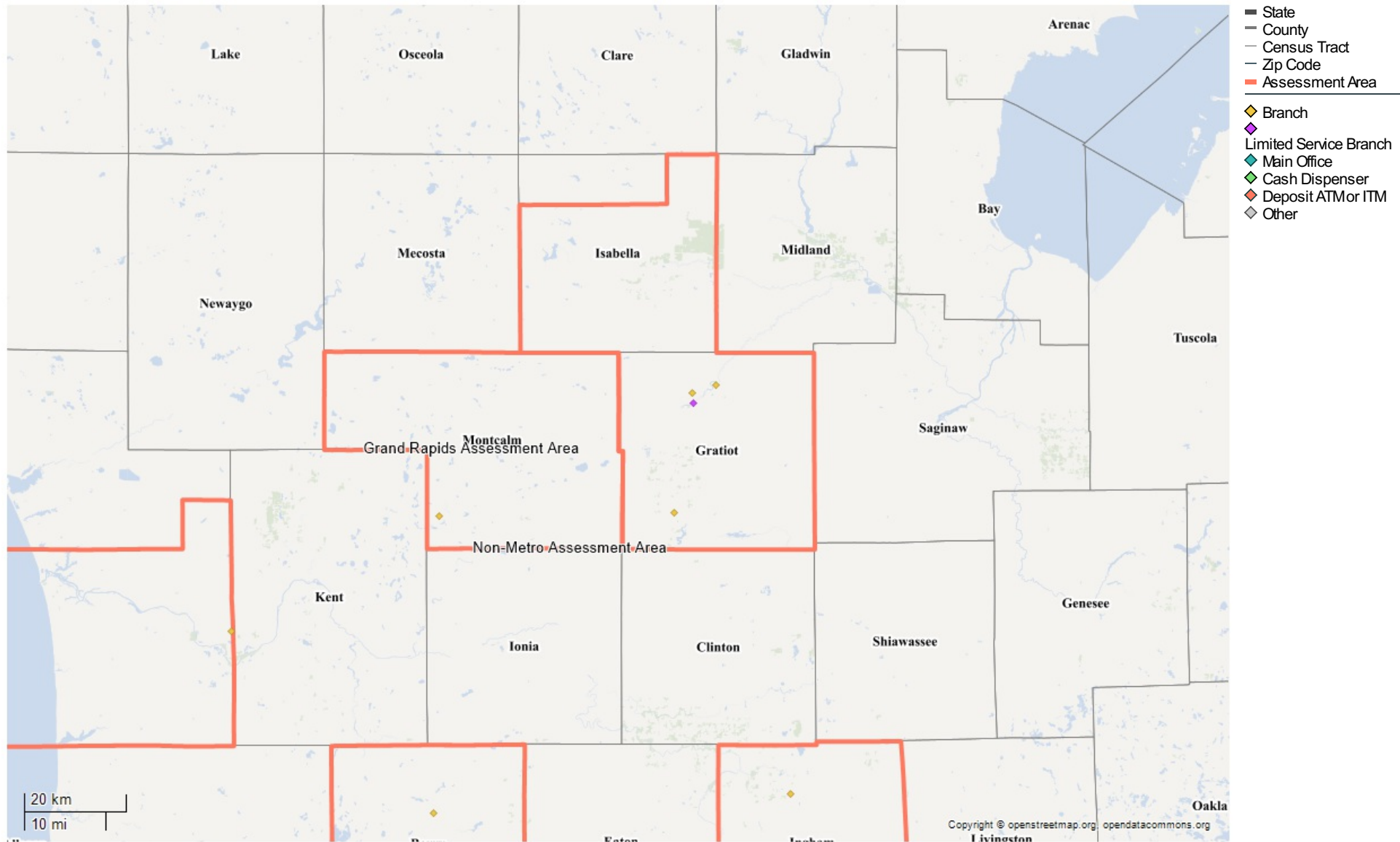
Monday - Friday: 8:30 am - 5:00 pm

BRANCH LOCATIONS OPENED OR CLOSED IN LAST TWO YEARS

	There have been no branch openings or closings in the last two years.
--	---

Commercial Bank (MI)

Gratiot Isabella Montcalm

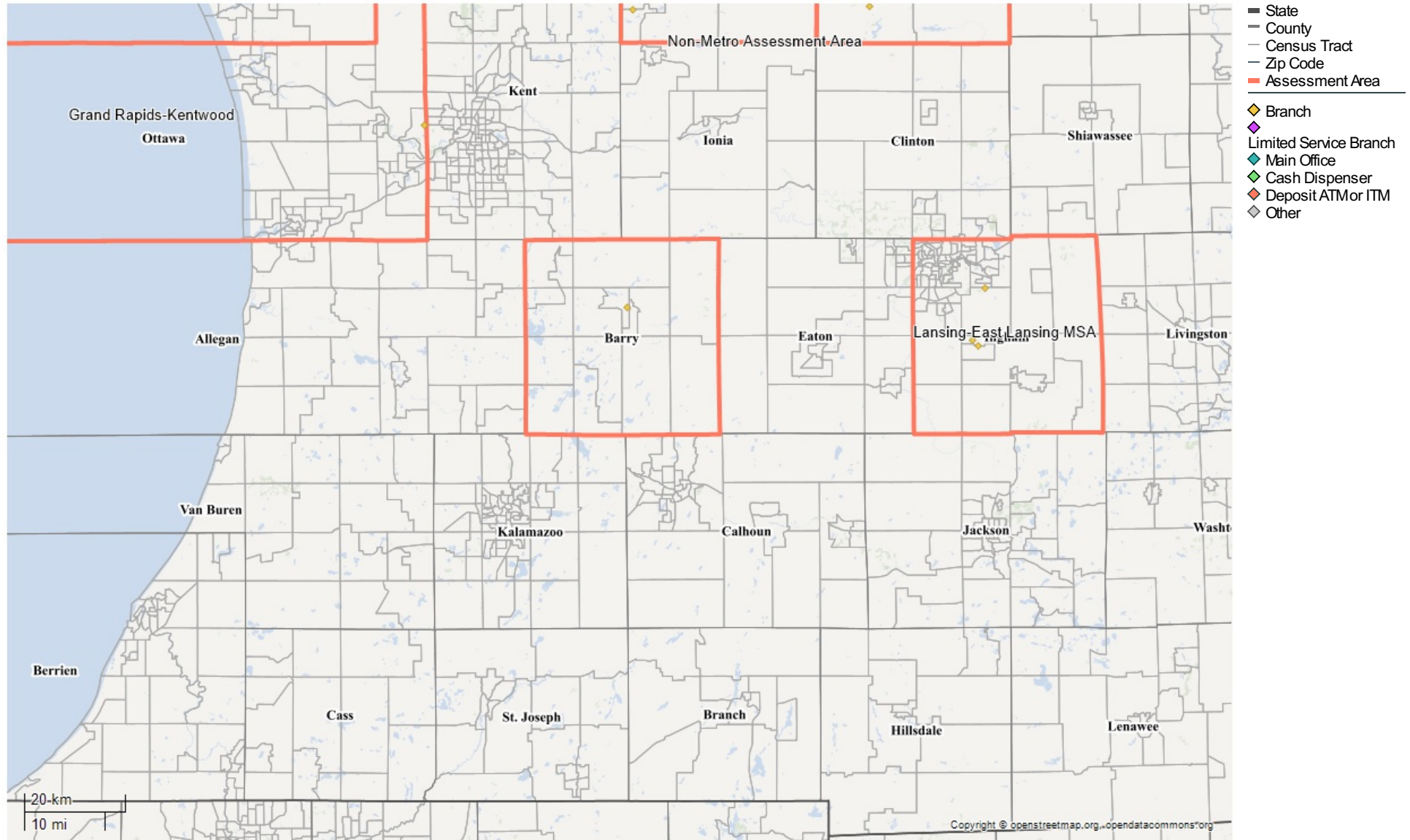


Applied Filters

- CRA Loans Action Taken Date: (5/26/1995 - 2/29/2024)
- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2023 - 12/31/2023)
- Real Estate Loans: HMDA LAR
- You are included in the HMDA benchmark.

Commercial Bank (MI)

Assessment Area Barry County

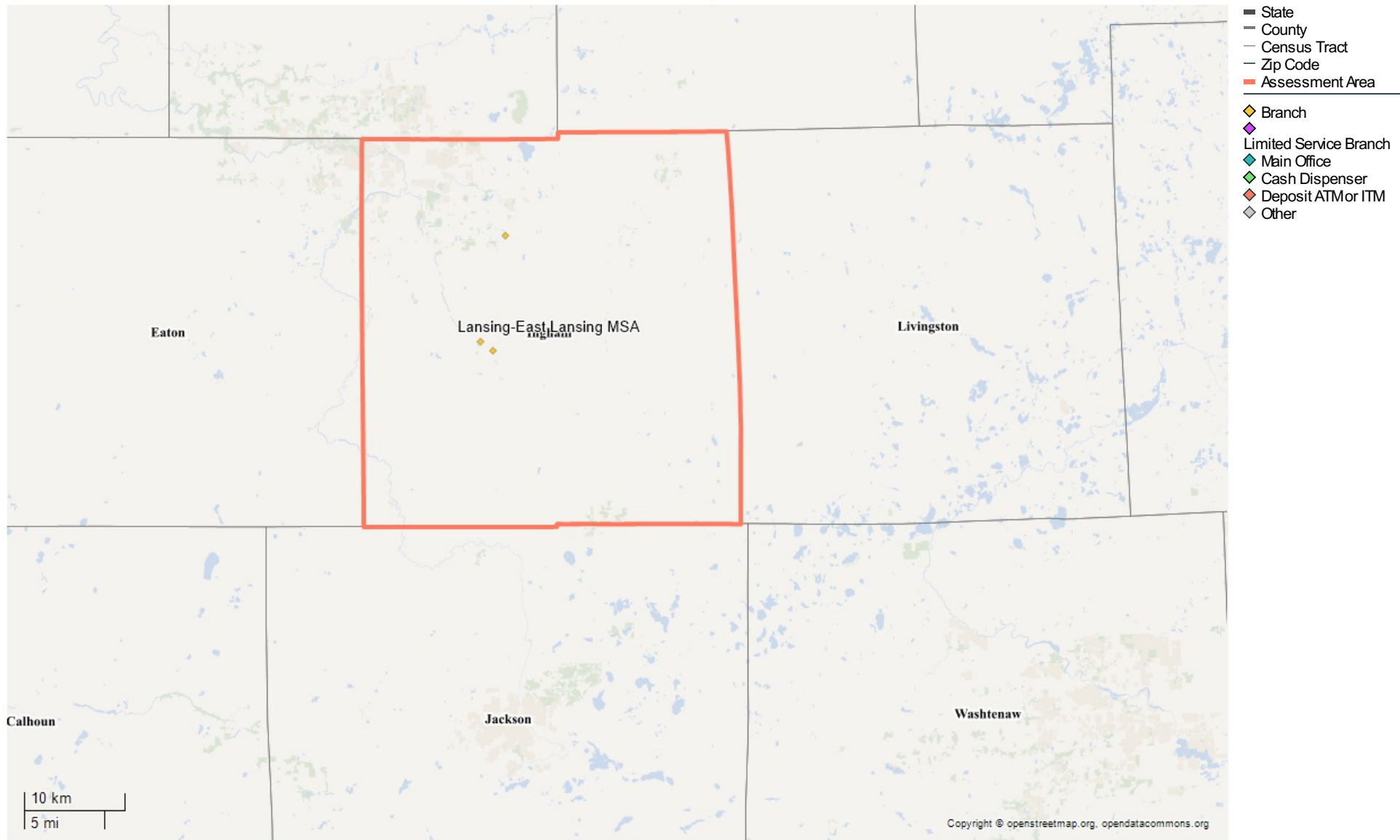


Applied Filters

- CRA Loans Action Taken Date: (5/26/1995 - 2/29/2024)
- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2023 - 12/31/2023)
- Real Estate Loans: HMDA LAR
- You are included in the HMDA benchmark.
- Area: (Lansing-East Lansing MSA, Grand Rapids Assessment, Grand Rapids-Kentwood, Non-Metro Assessment)

Commercial Bank (MI)

Assessment Area - Ingham County

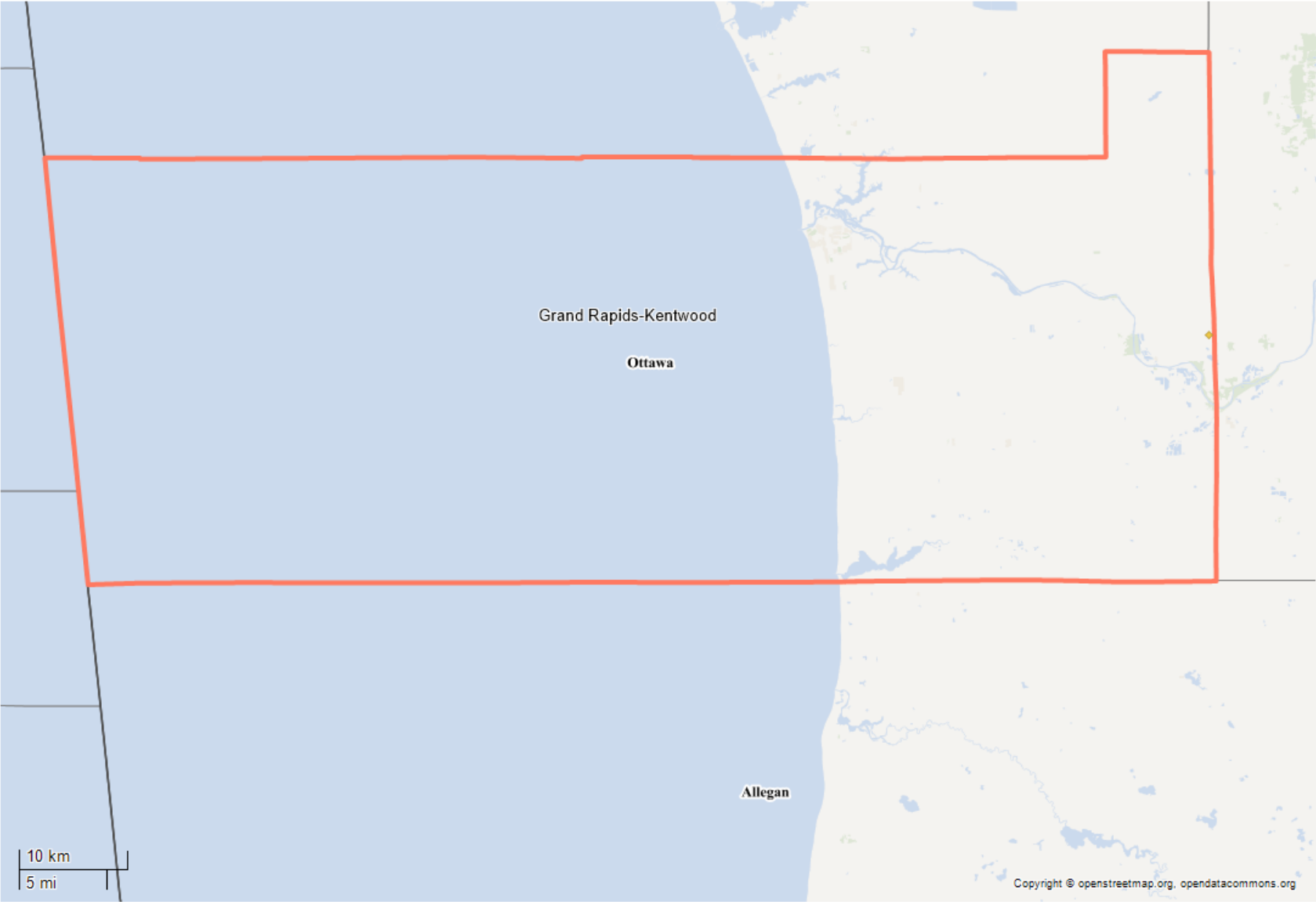


Applied Filters

- CRA Loans Action Taken Date: (5/26/1995 - 2/29/2024)
- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2023 - 12/31/2023)
- Real Estate Loans: HMDA LAR
- You are included in the HMDA benchmark.

Commercial Bank (MI)

Assessment Area - Ottawa County



- State
- County
- Census Tract
- Zip Code
- Assessment Area
- Branch
- Limited Service Branch
- Main Office
- Cash Dispenser
- Deposit ATM or ITM
- Other

Applied Filters

- CRA Loans Action Taken Date: (5/26/1995 - 2/29/2024)
- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2023 - 12/31/2023)
- Real Estate Loans: HMDA LAR
- You are included in the HMDA benchmark.



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	057	0001.00	Middle	No	92.14	\$79,800	\$73,528	\$59,861	3957	8.16	323	1438	1779
26	057	0002.00	Upper	No	120.15	\$79,800	\$95,880	\$78,060	4970	8.85	440	1763	2072
26	057	0003.00	Moderate	No	79.55	\$79,800	\$63,481	\$51,681	5058	16.96	858	1321	1732
26	057	0004.00	Unknown	No	0.00	\$79,800	\$0	\$0	3205	56.88	1823	0	0
26	057	0005.00	Moderate	No	77.33	\$79,800	\$61,709	\$50,243	5792	21.56	1249	1099	1733
26	057	0006.00	Moderate	No	78.59	\$79,800	\$62,715	\$51,057	4173	21.14	882	1124	1654
26	057	0007.00	Middle	No	102.74	\$79,800	\$81,987	\$66,750	3128	9.21	288	1110	1388
26	057	0008.00	Middle	No	112.52	\$79,800	\$89,791	\$73,102	4204	8.66	364	1295	1759
26	057	0009.00	Middle	No	92.35	\$79,800	\$73,695	\$60,000	3396	8.01	272	1137	1496
26	057	0010.00	Middle	No	92.99	\$79,800	\$74,206	\$60,417	3878	11.60	450	1163	1499

* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	073	0002.00	Middle	No	102.06	\$79,800	\$81,444	\$66,307	4984	9.21	459	1594	2281
26	073	0003.00	Middle	No	101.15	\$79,800	\$80,718	\$65,714	4920	7.28	358	1633	1985
26	073	0004.01	Upper	No	156.36	\$79,800	\$124,775	\$101,583	2168	38.33	831	134	174
26	073	0004.02	Upper	No	134.20	\$79,800	\$107,092	\$87,188	2380	16.18	385	729	1067
26	073	0005.00	Upper	No	129.36	\$79,800	\$103,229	\$84,044	3211	19.53	627	196	649
26	073	0006.00	Middle	No	87.41	\$79,800	\$69,753	\$56,786	4141	24.61	1019	533	984
26	073	0007.01	Low	No	47.36	\$79,800	\$37,793	\$30,772	2158	30.58	660	89	299
26	073	0007.02	Unknown	No	0.00	\$79,800	\$0	\$0	1957	29.38	575	16	140
26	073	0007.03	Unknown	No	0.00	\$79,800	\$0	\$0	2524	21.63	546	0	0
26	073	0008.00	Moderate	No	79.62	\$79,800	\$63,537	\$51,731	2627	22.50	591	218	379
26	073	0009.00	Middle	No	101.97	\$79,800	\$81,372	\$66,250	4094	11.60	475	1282	1665
26	073	9401.00	Middle	No	90.92	\$79,800	\$72,554	\$59,071	4321	12.08	522	1497	1928
26	073	9402.00	Moderate	No	79.60	\$79,800	\$63,521	\$51,715	5446	23.80	1296	1800	2422
26	073	9403.00	Middle	No	95.83	\$79,800	\$76,472	\$62,260	5045	20.69	1044	1892	2556
26	073	9404.00	Middle	No	82.20	\$79,800	\$65,596	\$53,406	3306	20.84	689	932	1576
26	073	9405.00	Middle	No	86.19	\$79,800	\$68,780	\$55,994	2406	21.20	510	367	979
26	073	9406.00	Upper	No	145.80	\$79,800	\$116,348	\$94,722	5213	11.11	579	1582	1876

* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	117	9701.00	Moderate	No	73.60	\$97,500	\$71,760	\$59,402	4195	6.65	279	1410	1971
26	117	9702.00	Moderate	No	61.81	\$97,500	\$60,265	\$49,890	3655	10.73	392	1058	1403
26	117	9703.00	Moderate	No	79.20	\$97,500	\$77,220	\$63,924	3327	6.88	229	1237	1879
26	117	9704.00	Moderate	No	64.32	\$97,500	\$62,712	\$51,915	3495	9.10	318	987	1622
26	117	9705.01	Middle	No	85.38	\$97,500	\$83,246	\$68,906	4631	9.22	427	1372	1890
26	117	9705.02	Moderate	No	77.03	\$97,500	\$75,104	\$62,175	3264	8.00	261	1070	1570
26	117	9706.00	Middle	No	85.29	\$97,500	\$83,158	\$68,839	5271	8.10	427	1786	2649
26	117	9707.00	Moderate	No	78.99	\$97,500	\$77,015	\$63,750	5220	7.18	375	1757	2399
26	117	9708.00	Moderate	No	69.82	\$97,500	\$68,075	\$56,354	4478	7.41	332	1377	2132
26	117	9709.00	Moderate	No	74.55	\$97,500	\$72,686	\$60,167	3168	7.64	242	1066	1864
26	117	9710.00	Moderate	No	70.99	\$97,500	\$69,215	\$57,300	9542	28.61	2730	1265	1888
26	117	9711.00	Middle	No	83.79	\$97,500	\$81,695	\$67,625	5191	10.79	560	1799	2293
26	117	9712.00	Moderate	No	68.86	\$97,500	\$67,139	\$55,580	5847	10.54	616	1816	2087
26	117	9713.00	Moderate	No	73.71	\$97,500	\$71,867	\$59,492	5330	10.24	546	1248	1732

* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	015	0101.00	Middle	No	100.67	\$79,800	\$80,335	\$65,405	5509	8.40	463	2031	2714
26	015	0102.00	Upper	No	124.20	\$79,800	\$99,112	\$80,688	6102	8.46	516	2012	2420
26	015	0103.01	Middle	No	115.29	\$79,800	\$92,001	\$74,901	3939	12.24	482	1009	1220
26	015	0103.02	Upper	No	163.54	\$79,800	\$130,505	\$106,250	5392	9.42	508	1422	1737
26	015	0104.01	Upper	No	125.98	\$79,800	\$100,532	\$81,848	3398	10.21	347	1209	1927
26	015	0104.03	Upper	No	147.88	\$79,800	\$118,008	\$96,071	3089	7.54	233	1250	1731
26	015	0104.04	Middle	No	110.53	\$79,800	\$88,203	\$71,806	2233	12.14	271	431	649
26	015	0105.00	Upper	No	133.91	\$79,800	\$106,860	\$87,000	3334	10.62	354	1305	1771
26	015	0106.01	Upper	No	134.23	\$79,800	\$107,116	\$87,208	3367	9.09	306	1282	1824
26	015	0106.02	Upper	No	128.35	\$79,800	\$102,423	\$83,385	3204	8.46	271	1199	1641
26	015	0107.00	Middle	No	112.33	\$79,800	\$89,639	\$72,981	4788	6.95	333	1783	2380
26	015	0108.00	Middle	No	114.48	\$79,800	\$91,355	\$74,375	3405	5.93	202	1139	1421
26	015	0113.01	Middle	No	100.26	\$79,800	\$80,007	\$65,137	4419	10.59	468	1229	1628
26	015	0113.02	Middle	No	103.55	\$79,800	\$82,633	\$67,275	3745	7.66	287	1163	1480
26	015	0114.01	Upper	No	169.64	\$79,800	\$135,373	\$110,208	2763	10.24	283	771	991
26	015	0114.02	Upper	No	150.41	\$79,800	\$120,027	\$97,714	3736	8.57	320	1205	1580

* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	065	0001.00	Low	No	49.38	\$94,400	\$46,615	\$38,841	1804	39.02	704	656	937
26	065	0004.00	Moderate	No	76.05	\$94,400	\$71,791	\$59,821	2762	42.36	1170	803	1335
26	065	0006.00	Moderate	No	61.34	\$94,400	\$57,905	\$48,250	1605	45.17	725	97	806
26	065	0007.00	Low	No	28.26	\$94,400	\$26,677	\$22,230	2464	49.11	1210	214	1175
26	065	0008.00	Moderate	No	52.85	\$94,400	\$49,890	\$41,577	2814	57.50	1618	383	952
26	065	0010.00	Middle	No	104.48	\$94,400	\$98,629	\$82,188	2047	26.77	548	659	1125
26	065	0012.00	Low	No	33.83	\$94,400	\$31,936	\$26,615	1958	48.37	947	307	1017
26	065	0017.03	Middle	No	89.27	\$94,400	\$84,271	\$70,218	4251	49.66	2111	1420	1778
26	065	0020.00	Low	No	39.98	\$94,400	\$37,741	\$31,450	3063	54.65	1674	425	1212
26	065	0021.01	Moderate	No	68.09	\$94,400	\$64,277	\$53,563	1863	55.45	1033	444	785
26	065	0022.00	Middle	No	94.82	\$94,400	\$89,510	\$74,583	1494	23.49	351	676	834
26	065	0023.00	Moderate	No	53.82	\$94,400	\$50,806	\$42,338	3405	32.66	1112	1051	1544
26	065	0026.00	Moderate	No	66.03	\$94,400	\$62,332	\$51,941	1953	40.50	791	555	772
26	065	0027.00	Moderate	No	61.81	\$94,400	\$58,349	\$48,621	3049	43.16	1316	1004	1335
26	065	0028.00	Middle	No	84.32	\$94,400	\$79,598	\$66,331	2430	32.02	778	889	1146
26	065	0029.01	Middle	No	94.82	\$94,400	\$89,510	\$74,583	2872	41.30	1186	893	1205
26	065	0029.02	Moderate	No	64.97	\$94,400	\$61,332	\$51,111	3805	50.51	1922	117	361
26	065	0031.03	Middle	No	92.30	\$94,400	\$87,131	\$72,604	5933	30.57	1814	1536	2056
26	065	0032.00	Low	No	44.40	\$94,400	\$41,914	\$34,926	2055	45.69	939	493	881
26	065	0033.01	Middle	No	80.22	\$94,400	\$75,728	\$63,099	3006	48.04	1444	752	1097
26	065	0033.02	Middle	No	103.19	\$94,400	\$97,411	\$81,172	2231	33.71	752	817	915
26	065	0034.00	Middle	No	91.61	\$94,400	\$86,480	\$72,061	2402	34.76	835	719	822
26	065	0035.00	Moderate	No	56.15	\$94,400	\$53,006	\$44,167	2862	40.39	1156	797	1144
26	065	0036.01	Moderate	No	61.49	\$94,400	\$58,047	\$48,373	3840	70.23	2697	999	1423
26	065	0036.02	Moderate	No	64.88	\$94,400	\$61,247	\$51,039	3410	65.48	2233	519	1254
26	065	0037.00	Moderate	No	66.41	\$94,400	\$62,691	\$52,241	5149	54.65	2814	1150	2016

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	065	0038.01	Upper	No	143.45	\$94,400	\$135,417	\$112,841	4079	35.13	1433	1090	1424
26	065	0038.02	Middle	No	97.64	\$94,400	\$92,172	\$76,806	4152	38.10	1582	763	803
26	065	0039.01	Upper	No	224.39	\$94,400	\$211,824	\$176,500	2101	22.61	475	589	731
26	065	0039.02	Upper	No	131.07	\$94,400	\$123,730	\$103,097	4126	24.87	1026	599	1158
26	065	0040.00	Upper	No	151.24	\$94,400	\$142,771	\$118,961	4560	20.90	953	854	1030
26	065	0041.00	Unknown	No	0.00	\$94,400	\$0	\$0	4566	15.70	717	69	622
26	065	0043.01	Middle	No	117.00	\$94,400	\$110,448	\$92,029	4505	22.24	1002	964	1676
26	065	0043.02	Unknown	No	0.00	\$94,400	\$0	\$0	2708	30.65	830	17	93
26	065	0044.02	Moderate	No	53.14	\$94,400	\$50,164	\$41,806	325	83.38	271	8	28
26	065	0044.03	Moderate	No	79.68	\$94,400	\$75,218	\$62,679	2364	36.84	871	251	336
26	065	0044.90	Unknown	No	0.00	\$94,400	\$0	\$0	3914	25.09	982	0	0
26	065	0044.91	Unknown	No	0.00	\$94,400	\$0	\$0	1210	36.20	438	0	0
26	065	0044.92	Unknown	No	0.00	\$94,400	\$0	\$0	3415	36.25	1238	0	0
26	065	0044.93	Unknown	No	0.00	\$94,400	\$0	\$0	1617	45.52	736	0	0
26	065	0044.94	Unknown	No	0.00	\$94,400	\$0	\$0	3357	41.91	1407	0	0
26	065	0045.00	Middle	No	81.98	\$94,400	\$77,389	\$64,490	3781	38.11	1441	584	1050
26	065	0046.00	Upper	No	197.49	\$94,400	\$186,431	\$155,345	4337	21.65	939	1622	1764
26	065	0047.00	Upper	No	144.68	\$94,400	\$136,578	\$113,804	2864	15.68	449	923	1328
26	065	0048.01	Middle	No	91.83	\$94,400	\$86,688	\$72,232	4345	24.33	1057	808	1061
26	065	0048.02	Upper	No	152.90	\$94,400	\$144,338	\$120,272	3236	16.41	531	1105	1197
26	065	0049.02	Middle	No	107.42	\$94,400	\$101,404	\$84,500	5321	36.68	1952	783	967
26	065	0049.03	Upper	No	141.02	\$94,400	\$133,123	\$110,927	2616	52.41	1371	399	548
26	065	0049.04	Upper	No	149.25	\$94,400	\$140,892	\$117,399	4648	25.62	1191	1289	1444
26	065	0050.02	Upper	No	189.18	\$94,400	\$178,586	\$148,804	4103	24.47	1004	1223	1280
26	065	0050.03	Upper	No	177.62	\$94,400	\$167,673	\$139,712	4217	46.91	1978	1048	1202
26	065	0050.04	Upper	No	132.87	\$94,400	\$125,429	\$104,514	3899	42.29	1649	906	1062
26	065	0051.00	Moderate	No	70.74	\$94,400	\$66,779	\$55,649	3288	60.58	1992	815	1175
26	065	0052.01	Moderate	No	56.23	\$94,400	\$53,081	\$44,233	5617	58.13	3265	1083	2199
26	065	0052.02	Upper	No	137.41	\$94,400	\$129,715	\$108,088	3720	28.98	1078	1020	1232

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	065	0053.03	Moderate	No	75.62	\$94,400	\$71,385	\$59,487	4673	44.81	2094	1054	1472
26	065	0053.04	Moderate	No	71.15	\$94,400	\$67,166	\$55,969	3148	59.78	1882	557	848
26	065	0053.05	Upper	No	131.79	\$94,400	\$124,410	\$103,664	3564	26.57	947	947	983
26	065	0053.06	Middle	No	85.53	\$94,400	\$80,740	\$67,281	3826	36.85	1410	614	1124
26	065	0054.01	Middle	No	94.69	\$94,400	\$89,387	\$74,487	3596	22.83	821	907	1313
26	065	0054.02	Moderate	No	70.37	\$94,400	\$66,429	\$55,357	3421	23.06	789	820	1207
26	065	0055.01	Upper	No	127.26	\$94,400	\$120,133	\$100,104	5974	20.72	1238	2270	2492
26	065	0055.02	Upper	No	120.19	\$94,400	\$113,459	\$94,544	6473	23.17	1500	1650	1953
26	065	0056.00	Middle	No	118.75	\$94,400	\$112,100	\$93,409	2912	12.74	371	915	1117
26	065	0057.00	Upper	No	156.95	\$94,400	\$148,161	\$123,456	5120	9.69	496	1678	1894
26	065	0058.00	Upper	No	163.72	\$94,400	\$154,552	\$128,780	5650	10.80	610	1927	2265
26	065	0059.00	Upper	No	131.33	\$94,400	\$123,976	\$103,304	5600	8.16	457	1668	2044
26	065	0060.01	Middle	No	101.31	\$94,400	\$95,637	\$79,688	3539	9.38	332	1109	1349
26	065	0060.02	Middle	No	106.68	\$94,400	\$100,706	\$83,917	3533	10.02	354	1247	1526
26	065	0061.00	Middle	No	105.25	\$94,400	\$99,356	\$82,791	4232	10.07	426	1419	1652
26	065	0062.00	Middle	No	104.10	\$94,400	\$98,270	\$81,882	5390	10.07	543	1615	1829
26	065	0063.01	Middle	No	101.08	\$94,400	\$95,420	\$79,508	4738	14.27	676	1400	1701
26	065	0063.02	Middle	No	98.52	\$94,400	\$93,003	\$77,500	4159	11.47	477	1169	1153
26	065	0064.01	Middle	No	109.69	\$94,400	\$103,547	\$86,286	4354	12.17	530	1456	1698
26	065	0064.02	Middle	No	108.06	\$94,400	\$102,009	\$85,000	2997	9.54	286	970	1167
26	065	0065.00	Moderate	No	53.60	\$94,400	\$50,598	\$42,163	3457	36.51	1262	722	1609
26	065	0066.00	Low	No	41.07	\$94,400	\$38,770	\$32,305	2864	46.68	1337	290	905
26	065	0067.00	Moderate	No	76.89	\$94,400	\$72,584	\$60,487	3819	62.11	2372	741	1634
26	065	0068.00	Low	No	49.49	\$94,400	\$46,719	\$38,929	3720	57.20	2128	751	1602
26	065	0070.00	Middle	No	83.28	\$94,400	\$78,616	\$65,509	5725	34.13	1954	1784	2655
26	065	9800.00	Unknown	No	0.00	\$94,400	\$0	\$0	859	34.92	300	0	11
26	065	9801.00	Unknown	No	0.00	\$94,400	\$0	\$0	19	47.37	9	12	12
26	065	9802.00	Unknown	No	0.00	\$94,400	\$0	\$0	15	53.33	8	0	0

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	065	9803.00	Unknown	No	0.00	\$94,400	\$0	\$0	5	40.00	2	0	0

* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	139	0201.00	Middle	No	102.96	\$97,500	\$100,386	\$83,101	5286	9.25	489	1728	2058
26	139	0202.00	Middle	No	83.92	\$97,500	\$81,822	\$67,734	4828	12.47	602	1139	1312
26	139	0204.00	Middle	No	105.09	\$97,500	\$102,463	\$84,813	4572	9.21	421	1513	1896
26	139	0205.01	Middle	No	100.50	\$97,500	\$97,988	\$81,111	3625	9.85	357	907	1240
26	139	0205.03	Upper	No	140.46	\$97,500	\$136,949	\$113,364	3847	10.01	385	1357	1623
26	139	0205.04	Middle	No	101.03	\$97,500	\$98,504	\$81,537	2627	9.52	250	850	1025
26	139	0206.00	Unknown	No	0.00	\$97,500	\$0	\$0	3317	9.38	311	1664	1931
26	139	0209.00	Middle	No	95.54	\$97,500	\$93,152	\$77,109	4623	11.05	511	1395	2270
26	139	0210.00	Middle	No	87.98	\$97,500	\$85,781	\$71,010	5614	9.49	533	1927	2607
26	139	0211.00	Middle	No	104.12	\$97,500	\$101,517	\$84,036	4920	7.64	376	1876	2208
26	139	0212.01	Upper	No	127.89	\$97,500	\$124,693	\$103,214	6016	13.26	798	1833	2024
26	139	0212.03	Middle	No	105.95	\$97,500	\$103,301	\$85,513	4036	11.69	472	1279	1572
26	139	0212.04	Middle	No	93.08	\$97,500	\$90,753	\$75,122	3004	14.38	432	671	806
26	139	0213.01	Middle	No	102.58	\$97,500	\$100,016	\$82,792	3343	9.27	310	1035	1092
26	139	0213.03	Upper	No	121.44	\$97,500	\$118,404	\$98,011	2737	12.86	352	738	831
26	139	0213.04	Upper	No	137.07	\$97,500	\$133,643	\$110,625	5936	8.71	517	1998	2153
26	139	0214.01	Middle	No	94.95	\$97,500	\$92,576	\$76,636	3441	12.06	415	1008	1273
26	139	0214.02	Middle	No	116.05	\$97,500	\$113,149	\$93,661	5361	7.95	426	1515	1550
26	139	0215.01	Middle	No	95.34	\$97,500	\$92,957	\$76,947	4906	9.56	469	1716	1815
26	139	0215.02	Middle	No	91.09	\$97,500	\$88,813	\$73,516	3889	15.12	588	855	1024
26	139	0216.03	Middle	No	90.60	\$97,500	\$88,335	\$73,125	4603	10.36	477	1600	1584
26	139	0216.04	Middle	No	115.18	\$97,500	\$112,301	\$92,963	7033	10.19	717	2562	2685
26	139	0216.05	Upper	No	134.89	\$97,500	\$131,518	\$108,864	3965	10.26	407	1226	1260
26	139	0216.06	Middle	No	106.90	\$97,500	\$104,228	\$86,281	4969	10.51	522	1389	1590
26	139	0217.00	Upper	No	126.43	\$97,500	\$123,269	\$102,042	5275	10.92	576	1361	1443
26	139	0218.01	Middle	No	92.00	\$97,500	\$89,700	\$74,250	4837	12.82	620	1167	1290

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	139	0218.02	Middle	No	112.43	\$97,500	\$109,619	\$90,740	4686	9.03	423	1518	1605
26	139	0219.01	Upper	No	121.44	\$97,500	\$118,404	\$98,015	5129	8.83	453	1525	1639
26	139	0219.03	Upper	No	122.11	\$97,500	\$119,057	\$98,553	5175	23.92	1238	1476	1560
26	139	0219.04	Upper	No	155.91	\$97,500	\$152,012	\$125,833	3206	5.96	191	1011	1084
26	139	0220.01	Middle	No	83.31	\$97,500	\$81,227	\$67,239	6106	22.01	1344	1751	2077
26	139	0220.02	Middle	No	104.23	\$97,500	\$101,624	\$84,125	4107	11.98	492	1376	1776
26	139	0221.03	Upper	No	132.01	\$97,500	\$128,710	\$106,544	1497	10.75	161	509	736
26	139	0221.05	Middle	No	106.29	\$97,500	\$103,633	\$85,788	5994	31.33	1878	1758	1957
26	139	0221.06	Upper	No	153.16	\$97,500	\$149,331	\$123,611	3873	12.42	481	1238	1342
26	139	0221.07	Middle	No	103.57	\$97,500	\$100,981	\$83,594	1231	16.33	201	551	812
26	139	0221.08	Upper	No	163.82	\$97,500	\$159,725	\$132,216	6030	11.44	690	2388	2992
26	139	0222.06	Upper	No	125.28	\$97,500	\$122,148	\$101,111	4792	24.62	1180	1667	1773
26	139	0222.07	Middle	No	83.81	\$97,500	\$81,715	\$67,642	4035	51.08	2061	871	1078
26	139	0222.08	Middle	No	81.35	\$97,500	\$79,316	\$65,657	4934	65.44	3229	1213	1666
26	139	0226.00	Middle	No	116.72	\$97,500	\$113,802	\$94,205	2222	15.98	355	823	983
26	139	0229.00	Middle	No	92.39	\$97,500	\$90,080	\$74,571	6336	16.13	1022	1838	2524
26	139	0230.01	Upper	No	121.16	\$97,500	\$118,131	\$97,783	7654	10.77	824	1886	1974
26	139	0230.03	Upper	No	146.47	\$97,500	\$142,808	\$118,210	4242	20.32	862	1282	1419
26	139	0230.04	Middle	No	108.95	\$97,500	\$106,226	\$87,932	4163	9.51	396	1019	1181
26	139	0231.01	Middle	No	115.42	\$97,500	\$112,535	\$93,155	5538	45.34	2511	1385	1466
26	139	0231.02	Middle	No	83.41	\$97,500	\$81,325	\$67,321	6330	51.23	3243	1045	1542
26	139	0232.00	Middle	No	117.05	\$97,500	\$114,124	\$94,470	2565	7.45	191	841	903
26	139	0235.00	Upper	No	143.58	\$97,500	\$139,991	\$115,881	5264	9.25	487	1433	1506
26	139	0236.00	Upper	No	146.90	\$97,500	\$143,228	\$118,558	2492	7.58	189	743	778
26	139	0243.00	Upper	No	125.26	\$97,500	\$122,129	\$101,092	5327	10.78	574	1626	1872
26	139	0244.01	Middle	No	105.66	\$97,500	\$103,019	\$85,273	6043	15.72	950	970	1593
26	139	0244.02	Middle	No	115.38	\$97,500	\$112,496	\$93,125	4499	13.31	599	1542	1849
26	139	0245.01	Low	No	33.54	\$97,500	\$32,702	\$27,069	5477	20.18	1105	130	794
26	139	0245.02	Low	No	19.83	\$97,500	\$19,334	\$16,007	7267	20.23	1470	3	150

* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
26	139	0246.00	Upper	No	151.54	\$97,500	\$147,752	\$122,303	7288	12.18	888	1524	1666
26	139	0249.01	Middle	No	93.74	\$97,500	\$91,397	\$75,658	3687	41.09	1515	712	1160
26	139	0249.02	Middle	No	111.71	\$97,500	\$108,917	\$90,156	2986	15.30	457	187	220
26	139	0251.01	Moderate	No	55.88	\$97,500	\$54,483	\$45,101	3642	49.29	1795	1058	1375
26	139	0251.02	Moderate	No	79.50	\$97,500	\$77,513	\$64,167	3654	32.90	1202	1099	1350
26	139	0252.00	Middle	No	101.49	\$97,500	\$98,953	\$81,910	5727	38.01	2177	1102	1977
26	139	0255.00	Middle	No	113.21	\$97,500	\$110,380	\$91,367	4366	17.06	745	1481	1471
26	139	0257.00	Moderate	No	76.97	\$97,500	\$75,046	\$62,121	5971	28.45	1699	1581	1988
26	139	0258.00	Middle	No	111.48	\$97,500	\$108,693	\$89,978	6055	50.69	3069	1498	2039
26	139	9900.00	Unknown	No	0.00	\$97,500	\$0	\$0	0	0.00	0	0	0

* Will automatically be included in the 2024 Distressed or Underserved Tract List

HOME MORTGAGE DISCLOSURE ACT NOTICE

To obtain a copy of Commercial Banks Home Mortgage Disclosure Act (HMDA), loan and application register, as modified by the Consumer Financial Protection Bureau to protect applicant and borrower privacy, please visit www.consumerfinance.gov/hmda.

LOAN-TO-DEPOSIT RATIO

	4th Qtr 12/31/2023	3rd Qtr 9/30/2023	2nd Qtr 6/30/2023	1st Qtr 3/31/2023
Loan-to-Deposit Ratio	81.24%	79.56%	80.95%	79.22%

2024 BANK SERVICES OFFERED

	LOANS	DEPOSIT & LOAN TRANSACTIONS	NEW DEPOSIT ACCOUNTS	SAFE DEPOSIT BOXES	AUTOMATED TELLER MACHINES (ATM)
Alma 1690 Wright Avenue Alma, MI 48801	Y	Y	Y	N	Y (cash dispenser only)
Greenville 10530 W. Carson City Rd. Greenville, MI 48838	Y	Y	Y	Y	Y (cash dispenser only)
Ithaca 101 N. Pine River Street Ithaca, MI 48847	Y	Y	Y	Y	Y (cash dispenser only)
Middleton 101 N. Newton Street Middleton, MI 48856	Y	Y	Y	Y	Y (cash dispenser only)
St. Louis 104 N. Mill Street St. Louis, MI 48880	Y	Y	Y	Y	Y (cash dispenser only)
Hastings 629 W. State Street Hastings, MI 49058	Y	Y	Y	Y	Y (cash dispenser only)
Mason 322 S. Jefferson St. Mason, MI 48854	Y	Y	Y	Y	Y (cash dispenser only)
Mason 661 N. Cedar Street Mason, MI 48854	N	Y	Y	N	Y (cash dispenser only)
Okemos 2112 Jolly Rd. Okemos, MI 48864	Y	Y	Y	Y	Y (cash dispenser only)
Alma LPO 301 N. State Street Alma, MI 48801	Y	N	N	Y	Y (cash dispenser only)

2024 DEPOSIT PRODUCTS

BUSINESS	CONSUMER
Interest Bearing	Interest Bearing
Time Deposit, Statement Savings and Checking Accounts	Time Deposit, Statement Savings, Checking Accounts, IRA's, Smart Saver, and Health Savings Accounts
Non-Interest Bearing	Non-Interest Bearing
Checking Accounts	Checking Accounts
Other Business Services	Other Consumer Services
Cash Management Services	Account Reconciliation
Night Depositories	Credit Card Cash Advances
Locking Deposit Bags	Cashier's Checks
Notary Services	ICS Services
Wire Transfers (Domestic and International)	Coin Counting
Remote Deposit Capture (RDC)	Foreign Check Processing
ICS Services	Foreign Currency
Positive Pay	Safe Deposit Box Services
Merchant Bankcard Referrals through Elavon	Notary Services
Direct Deposit of Payroll for Employees	Photocopy and Fax Services
Federal and State Tax Payments	Stop Payments
Child Support Payments	Wire Transfers (Domestic and International)
Collection of Receivables	Savings Bond Redemption
Cash Management Concentrations	Mobile Banking
Online Banking	Online Banking
Cashier's Checks	
Safe Deposit Box Services	
Automated Clearing House (ACH)	
Business Credit Card Referrals through Elan	

24/7 Access Delivery Channels

Debit/ATM Cards Cash dispensing ATM machines located at the Ithaca, Alma, St. Louis, Middleton, Mason, Greenville, Hastings and Okemos branches. Debit card may also be used at merchants that accept VISA® with PIN number for debit or signature as credit.	Telephone Banking 24/7 access to accounts through the telephone. This service allows balance and payment inquiries, fund transfers between Commercial Bank accounts, processed check inquiry, and report a lost or stolen debit card.
Online Banking This service is via the Internet. For Consumers it offers account balances and history, transfer funds, Bill Pay, view statements and check images, order checks, change address and place stop payments. For businesses it offers direct deposit of payroll, Federal and State tax payments, child support collection of receivables, cash management concentrations and Positive Pay. This is a secure way of essentially performing all banking functions 24/7.	Mortgage Website 24/7 access to consumer mortgage and home equity loan rates and fees. Able to apply for a mortgage anytime and receive automated approval.
Mobile Banking This service is available to consumer and business customers. Transfer funds between Commercial Bank accounts, Bill Pay and Mobile Check deposit.	Bank Website 24/7 website access for business and consumers to view branch locations, products offered, privacy notice, mortgage rates, apply for mortgage, security center, online services, contact us, e-mail customer service, lost or stolen debit card information, latest news, local events, and investor information.
Online Account Opening	

Offering online deposit account opening for new and existing retail customers via the bank's website. This service is restricted to Michigan residents 18 years of age and older only.

2024 LOAN PRODUCTS

BUSINESS	CONSUMER
Unsecured	Unsecured
Loans with no collateral.	Loan with no collateral
Revolving Lines of Credit	Automobile Loans
Loans primarily used for operating, receivables, equipment purchases or floor plans.	We provide new and used automobile secured loans.
Small Business Administration	Vacant Land Loans
Loans that allow many start-up businesses or undercapitalized businesses to receive financing. The bank receives a partial guarantee for a loan in the SBA Program, Express & 7(a).	Loans made on vacant land or platted lots.
Small Business Capital Access	Home Equity Lines of Credit
This program allows the bank to build a reserve for loan losses for loans enrolled into this program. The program is supported by the Michigan Strategic fund and like the SBA program allows some small businesses to receive financing that may not otherwise.	Loans with a revolving feature for 5 years. Can be accessed by check or transfer to a deposit account.
Equipment Loans	Renovation Loan
Term loans with specified equipment or a general assignment of all assets.	This loan type has a revolving draw feature for the first year and then is amortized for 14 years.
Letter of Credit	Personal Lines of Credit
This type provides 3rd parties with payment assurances.	Loans with revolving advance features that are unsecured.
Draw Down Line of Credit	Overdraft Line of Credit
When fully advanced or draw period time has expired, this loan has a term loan and payment.	These loans are for the purpose of protecting checking accounts from overdrafts.
Real Estate Loans	CD Secured Loans
Term loans with either fixed or adjustable rates and many payment terms secured by real estate.	Loans that are secured by certificates of deposit at our institution.
SBA 504	Miscellaneous Secured Loans
A program that is used for either commercial real estate or equipment purchases. The program provides long-term, fixed rate financing for major fixed assets that promote business growth and job creation.	These loans are secured including RV's, boats, motorcycles, ATV's, etc.
Construction Loans	Real Estate Mortgages
These loans have a draw down feature and have the availability to automatically roll to a term loan after the construction period ends.	Up to 30 year financing available. Participate with Rural Development (RD), and PMI loans. HOP grant funds available periodically.
USDA	Construction Loans
This program provides government guarantees for business loan transactions. The program allows the bank to lend to businesses that the bank would not otherwise be able to grant a loan.	These loans have a draw down feature and have the availability to automatically role to a term loan after the construction period.

**FEE SCHEDULE
COMMERCIAL BANK**



FEES AND CHARGES. The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

An overdraft fee of \$32.00 will be charged per item for covering overdrafts created by check or draft, in-person withdrawal, or other electron means.

Account Balancing Assistance (Per 1/4 Hour)	\$5.00
Account Research (Per 1/4 Hour)	\$5.00
ATM Withdrawal at an ATM we do not operate	\$1.00
Cashier's Check (Per Check) \$1000.00 and Over	\$5.00
Cashier's Check (Per Check) Under \$1000.00	\$3.00
Collection Fee per item Incoming/Outgoing Fees	\$7.50
Deposit Bags- Locking Night Deposit Bag	\$20.00
Deposit Bags-Vinyl Zipper Bags-First One Free and any additional (Business Customers Only)	\$4.00
Deposited Items Returned	\$12.00
Dormant Account Fee	\$7.00
Early Account Closure Within 90 Days of Account Opening	\$20.00
Escheat of Dormant Account	\$15.00
Foreign Currency Postage (Other Institution Charges May Vary)	\$25.00
Garnishment Fee	\$75.00
Night Depository Access Key (2) Charged Annually	\$10.00
Night Depository Additional Keys (Per Key)	\$4.00
NSF / OD Charges Non- Sufficient Fund (One time charge per item; representment fees are waived)	\$32.00
NSF / OD Charges Overdraft (One time charge per item; representment fees are waived)	\$32.00
Replacement Card Fees- ATM Replacement Card	\$20.00
Replacement Card Fees- Visa Debit Card Replacement	\$20.00
Safe Deposit Box Fees- Safe Deposit Box Drilling	\$150.00
Safe Deposit Box Fees- Safe Deposit Box Replacement Keys (Per Key)	\$10.00
Statement at Teller Line	\$3.00
Stop Payment	\$32.00
Tax Levy	\$75.00
Telephone Transfers	\$3.00
Wire Transfers- International Transfers	\$95.00
Wire Transfers- International Transfers - Non Profit Accounts	\$40.00
Wire Transfers- Outgoing for Deposit Customers	\$30.00

PUBLIC COMMENTS

Commercial Bank has not received any comments related to the bank's CRA performance in 2022 and 2023 and as of 03/29/2024.