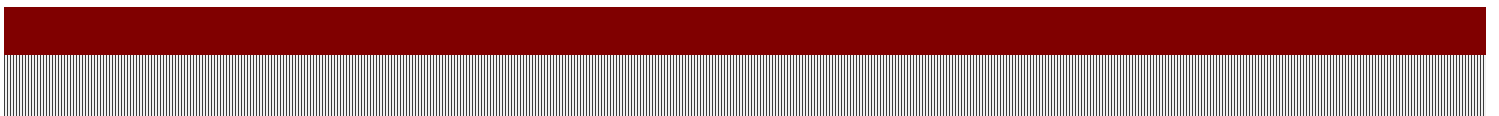




CRA Public File

COMMERCIAL BANK | MARCH 2025



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, 2025 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 \$1.609 billion .	
Intermediate Small Bank	A bank or savings association with assets of at least \$402 million as of December 31 of both of the prior 2 calendar years and less than \$1.609 billion as of December 31 of either of the prior 2 calendar years.	✓
Large Bank	Banks or savings associations with assets of at least \$1.609 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, 2024	\$566,149,707	
December 31, 2023	\$578,620,309	
December 31, 2022	\$613,249,483	

Distribution of Branches

Commercial Bank has ten (10) full-service offices, all of which are located in our assessment area and one (1) loan production office.

Commercial Bank's current CRA rating is **SATISFACTORY** based on our last evaluation on **September 16, 2024**.

PUBLIC DISCLOSURE

September 16, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Commercial Bank
Certificate Number: 18584

101 North Pine River Street
Ithaca, Michigan 48847

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.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas, 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 credit needs.
- The institution made a majority of its small business and home mortgage loans within its assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of loans reflects, given the demographics of the assessment areas, reasonable penetration among businesses of different sizes and individuals of different income levels.
- 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 demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the institution's capacity and the need and availability of community development opportunities in the assessment areas.

DESCRIPTION OF INSTITUTION

Commercial Bank (CB) is a full-service community bank headquartered in Ithaca, Michigan. The bank is a wholly owned subsidiary of Commercial National Financial Corporation (CNFC), a one-bank holding company also 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 August 2, 2021, based on Interagency Intermediate Small Institution Examination Procedures.

In addition to its main office, CB operates nine full-service branches within Gratiot, Montcalm, Barry, Ingham, and Ottawa counties. Additionally, CB operates a loan production office (LPO) in Alma, Michigan (Gratiot County). Since the previous evaluation, several branch and LPO changes occurred. In September 2021, the bank converted its full-service branch in Alma to an LPO and

relocated the corporate headquarters to Ithaca, MI. CB also closed the LPO's in Mount Pleasant and Grand Rapids in August 2022 and November 2023, respectively. Lastly, CB opened a full-service branch in Grand Rapids in June 2024. The following table provides additional information on branch locations.

Branch Locations				
Address	City	County	ATM	Census Tract Income Level
101 N Pine River St (main)	Ithaca	Gratiot	Yes	Middle
322 S Jefferson St	Mason	Ingham	Yes	Middle
629 W State St	Hastings	Barry	Yes	Upper
661 N Cedar St	Mason	Ingham	Yes	Middle
101 N Newton St	Middleton	Gratiot	Yes	Middle
1690 Wright Ave	Alma	Gratiot	Yes	Moderate
104 N Mill St	Saint Louis	Gratiot	Yes	Middle
10530 W Carson City Rd	Greenville	Montcalm	Yes	Moderate
2112 Jolly Rd	Okemos	Ingham	Yes	Upper
O-240 Lake Michigan Dr NW	Grand Rapids	Ottawa	Yes	Middle

Source: Bank Records, 2020 US Census Data

The bank offers traditional loan products including commercial, residential, and consumer loans, primarily focusing on commercial and residential lending. Deposit products include checking, savings, individual retirement accounts, and certificates of deposit. Alternative services include telephone, internet, and mobile banking, as well as electronic banking and ATMs.

Through a referral arrangement, the bank offers Federal Housing Administration, Federal Home Loan Bank Homeownership Program, and Rural Development home mortgage loans. These loans offer flexible underwriting standards, lower down payment requirements, and are geared towards low- and moderate-income borrowers. Additionally, 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. Lastly, CB participates in the Capital Access Program through the Michigan Strategic Fund to help provide businesses with small working capital loans.

According to June 30, 2024, Consolidated Reports of Condition and Income (Call Report) data, the bank's assets totaled \$572.3 million, with total loans of \$412.2 million and total securities of \$76.4 million. Total deposits represented \$507.2 million. The total loan portfolio decreased by 7.3 percent over the evaluation period largely due to the increasing interest rate environment of late. The following table illustrates the bank's loan portfolio composition.

Loan Portfolio Distribution as of 06/30/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	4,590	1.1
Secured by Farmland	17,771	4.3
Secured by 1-4 Family Residential Properties	163,558	39.7
Secured by Multifamily (5 or more) Residential Properties	20,845	5.1
Secured by Nonfarm Nonresidential Properties	151,088	36.7
Total Real Estate Loans	357,852	86.9
Commercial and Industrial Loans	39,915	9.7
Agricultural Production and Other Loans to Farmers	4,613	1.1
Consumer Loans	6,496	1.6
Obligations of State and Political Subdivisions in the U.S.	3,305	0.8
Other Loans	17	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	412,198	100.0
<i>Source: Reports of Condition and Income. Due to rounding, totals may not equal 100%</i>		

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

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its CRA performance. CB delineated three assessment areas in central Michigan. Brief descriptions of the assessment areas follow, and this evaluation contains separate sections for each assessment area that includes detailed information.

Several changes occurred within the assessment areas since the previous evaluation. CB added Ottawa County in the Grand Rapids-Wyoming-Kentwood, MI Metropolitan Statistical Area (MSA) when it opened the Grand Rapids branch in June 2024. Additionally, the Office of Management and Budget recently revised delineations for the MSA's nationwide based on population statistics and other factors. As a result, Barry County moved from the Michigan Non-MSA to the Grand Rapids-Wyoming-Kentwood, MI MSA. Therefore, 2024 Barry County community development activities will be included in the Grand Rapids-Wyoming-Kentwood, MI MSA while all other Barry County lending and community development activities will be presented in the Michigan Non-MSA assessment area. The assessment area breakdown as of 2023 is as follows:

- Michigan Non-MSA Assessment Area (Non-MSA) – entirety of Gratiot and Barry counties, and the eleven southernmost census tracts in Isabella County.
- Lansing-East Lansing, MI MSA Assessment Area (Lansing MSA) – entirety of Ingham County.
- Grand Rapids-Wyoming-Kentwood MSA Assessment Area (Grand Rapids MSA) – entirety of Montcalm and Ottawa counties.

The assessment areas 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.

Examiners conducted full-scope reviews of each assessment area. In arriving at overall conclusions, examiners weighed each assessment area separately based on the proportion of bank operations, deposits, and lending activity within each area. The assessment areas, in order from greatest to least weight are as follows: Non-MSA, Lansing MSA, Grand Rapids MSA. The following table includes details of each assessment area.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans*		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Non-MSA	49,680	53.1	319,607	63.0	5**	50.0
Lansing MSA	25,048	26.8	105,598	20.8	3	30.0
Grand Rapids MSA	18,818	20.1	82,011	16.2	2	20.0
Total	93,546	100.0	507,216	100.0	10	100.0

Source: Bank Data; FDIC Summary of Deposits (06/30/2024). *Loans include 2021-2023 home mortgage and 2022-2023 small business loans.
 **Non-MSA includes the Barry County branch office.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation, dated August 2, 2021, to the current evaluation dated September 16, 2024. 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. Performance criteria and metrics for each test are contained within the Appendices. Banks must achieve a rating of at least "Satisfactory" under each test to obtain an overall "Satisfactory" rating.

Activities Reviewed

Examiners determined the bank's major product lines are small business and home mortgage loans. This conclusion considered the number and dollar volume of loan originations during the evaluation period, the loan portfolio composition, and the bank's business strategy. Examiners did not consider small farm or consumer loans, as they are not major product lines and do not represent significant portions of the bank's loan portfolio.

Examiners considered the universe of the bank's small business loans originated in 2022 and 2023. This activity is representative of CB's performance during the entire evaluation period. The bank originated 259 small business loans totaling \$38.7 million in 2022, and 229 loans totaling \$29.7 million in 2023. Examiners presented both years in the tables for the Geographic Distribution and Borrower Profile criteria. D&B data served as a comparator for small business lending activity.

Examiners considered all home mortgage loans reported on the bank's 2021, 2022, and 2023 Home

Mortgage Disclosure Act (HMDA) Loan Application Registers. While the bank experienced a significant decrease in home mortgage originations between 2021 and 2022 due to the rising interest rate environment, examiners presented 2022 and 2023 HMDA lending in the tables for the Geographic Distribution and Borrower Profile criteria as these years are representative of performance for the entire review period. CB originated 278 HMDA-reportable loans totaling \$50.1 million in 2021, 109 loans totaling \$23.0 million in 2022, and 61 loans totaling \$11.8 million in 2023. Examiners used aggregate HMDA and 2020 U.S. Census demographic data to assess the bank's performance. The aggregate lending data consists of all originated and purchased loans in the assessment areas by all lenders subject to HMDA data reporting requirements. In general, the aggregate lending data helps illustrate market demand and lending opportunities.

Examiners placed greater emphasis on the bank's small business lending in the overall conclusions based on the larger number of loan originations during the review period, and slightly larger proportion of the bank's loan portfolio. For the Lending Test, examiners reviewed the number and dollar volume of loans and emphasized performance by number of loans as it is a better indicator of the number of individuals and businesses served.

For the Community Development Test, bank management provided data on community development loans, qualified investments, grants and donations, and community development services since the previous evaluation dated August 2, 2021.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Lending Test performance is reasonable overall, based on the institution's performance for each of the evaluated criteria.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's net LTD ratio, calculated from Call Report data, averaged 79.6 percent over the last 12 calendar quarters, from September 30, 2021, to June 30, 2024. The ratio fluctuated during the evaluation period and ranged from a high of 89.1 percent on September 30, 2021, to a low of 74.2 percent on June 30, 2022.

As shown in the following table, CB's net LTD ratio exceeded all three similarly-situated institutions, which examiners chose based on asset size, geographic location, and lending focus.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 06/30/2024 (\$000s)	Average Net LTD Ratio (%)
Commercial Bank	572,263	79.6
Similarly-Situated Institution #1	469,905	55.0
Similarly-Situated Institution #2	443,207	66.2
Similarly-Situated Institution #3	539,766	62.6
Source: Reports of Condition and Income 09/30/2021 – 06/30/2024		

Assessment Area Concentration

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

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										
2021	201	72.3	77	27.7	278	31,394	62.7	18,714	37.3	50,108
2022	74	67.9	35	32.1	109	14,266	62.1	8,719	37.9	22,985
2023	43	70.5	18	29.5	61	7,922	67.1	3,892	32.9	11,814
Subtotal	318	71.0	130	29.0	448	53,582	63.8	31,325	36.2	84,907
Small Business										
2022	174	67.2	85	32.8	259	25,542	66.0	13,178	34.0	38,720
2023	137	59.8	92	40.2	229	14,422	48.6	15,249	51.4	29,671
Subtotal	311	63.7	177	36.3	488	39,964	58.4	28,427	41.6	68,391
Total	629	67.2	307	32.8	936	93,546	61.0	59,752	39.0	153,298
Source: Bank Data. Due to rounding, totals may not equal 100.0%										

Geographic Distribution

The geographic distribution of loans reflects overall reasonable dispersion throughout the assessment areas. Performance ranged from excellent to reasonable for both small business and home mortgage lending. Refer to the separate assessment area discussions for further details regarding the institution's performance under this criterion.

Borrower Profile

The distribution of borrowers reflects reasonable penetration overall among businesses of different sizes and retail customers of different income levels. Examiners arrived at this conclusion based upon the bank's excellent to reasonable performance in serving businesses of different sizes and borrowers with varying income levels. Refer to the separate assessment area discussions for further details regarding the institution's performance under this criterion.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

CB demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities.

CB's community development performance was evaluated for all three assessment areas. Examiners evaluated the bank's community development performance through comparisons to two similarly-situated institutions that received a Satisfactory rating at the most recent CRA evaluations. The institutions have a similar assessment area, lending focus, and asset size as CB.

Community Development Loans

CB originated 13 community development loans totaling approximately \$5.3 million within the assessment areas during the evaluation period. The bank's performance increased from the previous evaluation where it originated seven community development loans totaling \$1.9 million that were not part of the SBA's Paycheck Protection Program. CB's performance represents 0.9 percent of average total assets and 1.3 percent of average net loans.

Examiners compared CB's performance to two similarly-situated institutions, whose qualified community development loans ranges from 1.0 to 1.9 percent of average total assets, and from 1.6 to 3.5 percent of average net loans. CB's performance was slightly below both institutions.

The following table presents the bank's community development lending by year and purpose. The separate assessment area sections later in the evaluation include additional details.

Community Development Lending- Overall										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021 (Partial)	0	0	0	0	0	0	0	0	0	0
2022	2	1,036	0	0	0	0	1	139	3	1,175
2023	1	350	3	1,700	0	0	3	417	7	2,468
2024 (YTD)	0	0	2	1,345	0	0	1	337	3	1,683
Total	3	1,386	5	3,045	0	0	5	893	13	5,326

Source: Bank Data

Qualified Investments

During the evaluation period, CB's qualified investments included grants, donations, and prior period equity investments totaling \$9.8 million. Bank performance fell below the prior evaluation of \$15.5 million in qualified activities. The bank's qualified investments include three affordable housing projects that benefit a broader, statewide area that included the assessment areas. CB's qualified investments represented 1.6 percent of average total assets and 11.4 percent of average total securities during the review period. Its performance fell between two similarly-situated institutions as one did not originate any qualified investments during the review period, while the other had qualified investments totaling 3.1 percent of average total assets and 12.5 percent of average total securities.

The following table provides details regarding CB's qualified investments, grants, and donations throughout the review period. The discussions within the separate assessment areas later in this evaluation contain additional details.

Qualified Investments by Year- Overall										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	10	2,528	0	0	0	0	0	0	10	2,528
2021 (Partial)	1	750	0	0	0	0	0	0	1	750
2022	0	0	0	0	0	0	0	0	0	0
2023	8	4,026	0	0	0	0	0	0	8	4,026
2024 (YTD)	4	2,484	0	0	0	0	0	0	4	2,484
Subtotal	23	9,788	0	0	0	0	0	0	23	9,788
Grants & Donations	4	30	12	17	2	5	0	0	18	53
Total	27	9,818	12	17	2	5	0	0	41	9,840

Source: Bank Data

Community Development Services

CB provided 45 instances of financial expertise or technical assistance across the assessment areas, and three instances of services that benefitted the broader statewide area during the evaluation period. The services provided to the broader statewide area included an officer's participation on a loan committee that provides low-cost loans to qualified applicants seeking to purchase assistive devices such as wheelchairs, hearing aids, and modified vehicles.

CB's performance remained consistent with the previous evaluation when the bank provided 49 instances of community development services. CB's performance fell between the two similarly-situated institutions, that provided 12 and 142 instances of community development services.

The following table presents the bank's community development services by instance for each year and purpose. Further details are included in the separate assessment area sections.

Community Development Services- Overall					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
2021 (Partial)	0	0	2	0	2
2022	1	4	5	2	12
2023	1	7	5	2	15
2024 (YTD)	2	10	5	2	19
Total	4	21	17	6	48
<i>Source: Bank Data</i>					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

NON-MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-MSA ASSESSMENT AREA

This assessment area consists of the entirety of Gratiot and Barry counties and 17 census tracts in Isabella County in 2021, 2022, and 2023. The assessment area excludes Barry County in 2024 because it was added to the Grand Rapids MSA, as previously discussed. Using the assessment area composition prior to 2024, CB operates the main office and four additional full-service branches in this assessment area, three in Gratiot County and one in Barry County.

Economic and Demographic Data

The assessment area consists of 43 census tracts with the following income designations: one low-income, five moderate-income, 20 middle-income, 14 upper-income, and three tracts with no income designation. A correctional facility operates in the tracts with no income designation. The following table illustrates select demographic characteristics of the assessment area based on 2020 U.S. Census data.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	11.6	46.5	32.6	7.0
Population by Geography	165,085	1.3	14.0	48.3	31.7	4.7
Housing Units by Geography	71,524	1.8	13.6	50.3	32.1	2.1
Owner-Occupied Units by Geography	46,384	0.2	12.0	53.2	34.6	0.0
Occupied Rental Units by Geography	16,697	6.4	19.3	45.9	22.1	6.3
Vacant Units by Geography	8,443	1.8	11.4	43.1	38.5	5.2
Businesses by Geography	9,553	0.9	12.5	52.2	32.0	2.3
Farms by Geography	801	0.1	6.6	60.2	33.1	0.0
Family Distribution by Income Level	39,924	17.5	16.3	22.5	43.7	0.0
Household Distribution by Income Level	63,081	23.4	15.3	18.2	43.1	0.0
Median Family Income Non-MSAs - MI		\$64,965	Median Housing Value			\$141,175
			Median Gross Rent			\$751
			Families Below Poverty Level			9.0%
Source: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, the largest employment sectors in the assessment area are services, retail trade, and construction. The area contains 9,553 businesses, of which 68.6 percent have four or fewer employees and 88.3 percent operate from a single location. Major employers include Central Michigan University, MyMichigan Medical Center, and Avalon & Tague Manufacturing.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units, of which 64.9 percent are owner-occupied. With a median housing value of \$141,175 and a median family income of \$64,945, according to the 2020 U.S. Census, housing is relatively affordable. However, like the rest of the county, housing costs within the assessment area have increased over the last few years making it more difficult for low- and moderate-income borrowers to afford a home.

Data obtained from the U.S. Bureau of Labor Statistics is detailed in the following table. Unemployment rates in Gratiot and Isabella counties were consistent with or somewhat higher than the state and national average most years, while Barry County was lower or consistent with the state and national averages.

Unemployment Rates				
Area	2021	2022	2023	August 2024
	%	%	%	%
Gratiot County	5.5	4.5	4.4	5.1
Isabella County	5.2	4.7	4.5	5.8
Barry County	4.5	3.7	3.5	4.2
State of Michigan	5.7	4.1	3.9	4.5
National Average	5.3	3.6	3.6	4.2
Source: Bureau of Labor Statistics				

Examiners used FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the assessment area during the evaluation period.

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)				
2021 (\$62,900)	<\$31,450	\$31,450 to <\$50,320	\$50,320 to <\$75,480	≥\$75,480
2022 (\$71,500)	<\$35,750	\$35,750 to <\$57,200	\$57,200 to <\$85,800	≥\$85,800
2023 (\$79,800)	<\$39,900	\$39,900 to <\$63,840	\$63,840 to <\$95,760	≥\$95,760
2024 (\$78,300)	<\$39,150	\$39,150 to <\$62,640	\$62,640 to <\$93,960	≥\$93,960
Source: FFIEC				

Competition

The assessment area is moderately competitive in the market for financial services. According to FDIC Deposit Market Share data as of June 30, 2024, nine financial institutions operate 34 banking offices within the assessment area. Of these institutions, CB ranked third with 14.2 percent of the deposit market share. The two most prominent institutions accounted for 53.8 percent of the total deposit market share.

There is a moderately high level of competition in the assessment area for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. Based on 2023 aggregate HMDA aggregate data, 239 lenders originated or purchased a total of 3,295 home mortgage loans in the assessment area. CB ranked 26th with a market share of 1.1 percent. The five most prominent lenders accounted for 27.7 percent of the total market share.

The bank is not required to collect or report its small business lending data and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons to aggregate lending data. The aggregate lending data, however, reflects the level of competition for small business loans. Aggregate lending data for 2022, the most recent year available, shows 46 institutions originated 2,140 small business loans in the assessment area, indicating a moderate level of competition. The five most prominent lenders accounted for 65.8 percent of all originations.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners interviewed a representative from a local municipality operating in the central portion of the assessment area. The contact said the local economy is relatively stable but has experienced periods of stagnation. Changes to local spending habits since the pandemic, rising interest rates, and inflationary pressures on consumers has reduced spending at local businesses. This has stunted growth in the downtown area, with many businesses reducing their hours of operation. The contact said about half of the working population travel to other communities for employment. The contact expressed that municipalities in the area want to work with financial institutions on public-private partnerships to promote economic development and homeownership for first-time homebuyers. Lastly, the contact stated that local financial institutions meet community needs by supporting downtown development, participating in community events and, specific to CB, providing home mortgage lending opportunity to area residents.

Examiners also referenced a community contact with a community development group operating in the southernmost portion of the AA. The contact stated that local economic conditions are relatively strong. While companies in the area are hiring, about 30 percent of the local population still travel to other communities for employment. The contact noted that most employment is within the manufacturing and healthcare sectors. The contact added that the area has an aging population, and family sizes are smaller than in the past. This has created a lack of housing stock, as older residents tend to stay in their homes for longer periods of time and young families cannot find homes. The contact stated that additional housing stock is a primary need, and local banks are willing to work with developers on expansion efforts. The contact also said area institutions provide other community needs through outreach efforts and financial literacy education in the local school system.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined home mortgage products targeted towards first-time homebuyers, additional housing stock, economic development in downtown areas, and start-up small businesses represent the primary credit needs in the assessment area. Although examiners did not identify any major unmet credit or community development needs, there remains opportunities for these initiatives.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NON-MSA ASSESSMENT AREA

LENDING TEST

CB demonstrated overall reasonable performance in this assessment area under the Lending Test. Excellent Geographic Distribution and reasonable Borrower Profile performance support this conclusion.

Geographic Distribution

The geographic distribution of small business and home mortgage loans reflects excellent dispersion throughout the assessment area.

Small Business Loans

The geographic distribution of small business lending reflects excellent dispersion throughout the assessment area. Limited opportunities exist in low-income census tracts as the single tract contains 0.9 percent of area businesses. The bank's performance in moderate-income tracts exceeded the percentage of business in those tracts in 2022 and improved significantly in 2023 when 30.6 percent of its loans were in moderate-income tracts compared to just 12.5 percent of businesses. The following table shows the distribution of small business loans by census tract income designation.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$ (000s)	%
Low					
2022	0.9	1	1.1	750	6.3
2023	0.9	0	0.0	0	0.0
Moderate					
2022	12.7	13	14.3	2,530	21.3
2023	12.5	15	30.6	1,016	27.2
Middle					
2022	52.1	68	74.7	7,387	62.3
2023	52.2	28	57.1	2,030	54.3
Upper					
2022	32.2	9	9.9	1,199	10.1
2023	32.0	6	12.2	694	18.6
Not Available					
2022	2.1	0	0.0	0	0.0
2023	2.3	0	0.0	0	0.0
Totals					
2022	100.0	91	100.0	11,866	100.0
2023	100.0	49	100.0	3,740	100.0

Source: 2022 & 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. The assessment area includes one low-income census tract, containing only 0.2 percent of the owner-occupied housing units and indicates minimal demand for home mortgage loans. Lending in moderate-income tracts exceeded aggregate HMDA data and the percentage of owner-occupied housing units for both 2022 and 2023. The following table shows the distribution of home mortgage loans compared with the percentage of owner-occupied housing units as well as aggregate HMDA data.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	0.2	0.2	0	0.0	0	0.0
2023	0.2	0.2	0	0.0	0	0.0
Moderate						
2022	12.0	10.0	10	18.9	1,831	17.9
2023	12.0	12.6	6	17.1	823	13.0
Middle						
2022	53.2	51.4	30	56.6	5,898	57.7
2023	53.2	51.6	17	48.6	2,929	46.2
Upper						
2022	34.6	38.5	13	24.5	2,487	24.3
2023	34.6	35.6	12	34.3	2,590	40.8
Totals						
2022	100.0	100.0	53	100.0	10,215	100.0
2023	100.0	100.0	35	100.0	6,341	100.0
Source: 2020 U.S. Census; Bank Data, 2022-2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%						

Borrower Profile

The distribution of borrowers, given the demographics of the assessment area, reflects reasonable penetration among businesses of different sizes and borrowers of different income levels. Examiners focused on the percentage by number of loans to businesses with gross annual revenues (GARs) of \$1.0 million or less and home mortgage loans to low- and moderate-income borrowers.

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. A substantial majority of the bank's small business loans were to businesses with GARs of \$1.0 million or less. While the bank's lending performance slightly trailed the percentage of businesses reporting gross annual revenues of \$1.0 million or less, its performance is noteworthy as many small businesses seek alternative financing solutions such as credit cards and home equity loans. Additionally, examiners noted the bank's considerable improvement since last CRA evaluation when its performance was rated poor in this area, indicating it has made an active effort to lend to businesses with GARs of \$1.0 million or less. The following table shows the distribution of lending by borrower GAR levels in the assessment area.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2022	82.8	68	74.7	10,079	84.9
2023	83.2	37	75.5	2,575	68.9
>\$1,000,000					
2022	4.8	23	25.3	1,787	15.1
2023	4.6	12	24.5	1,165	31.2
Revenue Not Available					
2022	12.4	0	0.0	0	0.0
2023	12.2	0	0.0	0	0.0
Totals					
2022	100.0	91	100.0	11,866	100.0
2023	100.0	49	100.0	3,740	100.0

Source: 2022 & 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels. The bank's lending to low-income borrowers exceeded aggregate performance in 2022 but declined and fell below aggregate in 2023. Bank performance also trailed the percentage of families. However, the low-income category includes 9.0 percent of families in the assessment area with incomes below the poverty level. These families are unlikely to qualify for and be able to service debt in amounts sufficient to afford homes in the area. Information from a community contact also indicated housing stock is limited which increases competition among borrowers, and low-income borrowers often cannot compete with others who can offer above asking price for a home.

CB's lending to moderate-income borrowers exceeded the percentage of moderate-income families and was consistent with aggregate performance in 2022 and slightly trailed in 2023. Examiners consider this performance reasonable. The following table shows the bank's performance by income category and includes the percentage of families within each income level as well as aggregate HMDA data.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	17.5	7.4	5	9.4	312	3.1
2023	17.5	7.6	1	2.9	65	1.0
Moderate						
2022	16.3	22.9	12	22.6	1,199	11.7
2023	16.3	21.9	6	17.1	706	11.1
Middle						
2022	22.5	22.8	10	18.9	1,672	16.4
2023	22.5	23.4	5	14.3	840	13.2
Upper						
2022	43.7	33.1	25	47.2	6,832	66.9
2023	43.7	32.1	20	57.1	4,495	70.9
Not Available						
2022	0.0	13.7	1	1.9	200	2.0
2023	0.0	15.0	3	8.6	236	3.7
Totals						
2022	100.0	100.0	53	100.0	10,215	100.0
2023	100.0	100.0	35	100.0	6,341	100.0

Source: 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

COMMUNITY DEVELOPMENT TEST

CB demonstrates adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of opportunities.

Community Development Loans

CB originated six community development loans totaling approximately \$3.4 million during the evaluation period. The following table summarizes the bank's community development lending in the assessment area by year and purpose.

Community Development Lending										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
2021 (Partial)	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0
2023	0	0	3	1,700	0	0	0	0	3	1,700
2024 (YTD)	0	0	2	1,345	0	0	1	337	3	1,683
Total	0	0	5	3,045	0	0	1	337	6	3,383

Source: Bank Data

The following are notable examples of community development lending in the assessment area:

- In 2023, a \$500,000 loan to fund building improvements in a school district where over 50.0 percent of students received free or reduced cost lunches.
- In 2024, a \$645,268 loan to construct a mental health and social services facility in a moderate-income census tract and provide services to low- and moderate-income individuals in the area.

Qualified Investments

CB made qualified investments and donations totaling approximately \$900,000 during the evaluation period. All qualified investments were mortgage-backed securities comprised of loans to low- and moderate-income individuals in the assessment area. Grants and donations provided funding for economic development efforts and financial literacy programs and after school programs for children residing in lower income households.

Qualified Investments by Year										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Prior Period	2	125	0	0	0	0	0	0	2	125
2021 (Partial)	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0
2023	2	760	0	0	0	0	0	0	2	760
2024 (YTD)	0	0	0	0	0	0	0	0	0	0
Subtotal	4	886	0	0	0	0	0	0	4	886
Grants & Donations	0	0	6	9	2	5	0	0	8	14
Total	4	886	6	9	2	5	0	0	12	900

Source: Bank Data

Community Development Services

CB staff provided 25 instances of community development services across eight organizations in the assessment area during the evaluation period. The following table details the bank's community development services by year and purpose.

Community Development Services					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
2021 (Partial)	0	0	2	0	2
2022	0	2	4	2	8
2023	0	2	4	2	8
2024 (YTD)	0	1	4	2	7
Total	0	5	14	6	25

Source: Bank Data

Notable examples of these services include:

- An employee served on the Board of Directors for a finance authority providing low interest bonds to complete projects in the assessment area.
- Multiple employees taught financial literacy education classes to elementary school children at local schools where over 50.0 percent of the student population qualified for free or reduced cost lunches.

LANSING-EAST LANSING, MI MSA ASSESSMENT AREA – Full-Scope Review

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

This assessment area consists of the entirety of Ingham County. The bank operates three full-service branches within this assessment area.

Economic and Demographic Data

The assessment area consists of 84 census tracts with the following income designations: seven low-income, 21 moderate-income, 26 middle-income, 19 upper-income, and 11 tracts with no income designation. The tracts with no income designation are primarily comprised of Michigan State University locations. The following table shows select economic and demographic characteristics of the assessment area based on 2020 U.S. Census data.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	84	8.3	25.0	31.0	22.6	13.1
Population by Geography	284,900	6.3	23.4	34.3	28.4	7.6
Housing Units by Geography	124,012	7.4	26.8	36.0	27.5	2.3
Owner-Occupied Units by Geography	66,879	4.7	20.9	40.2	34.1	0.1
Occupied Rental Units by Geography	46,799	9.9	33.5	31.1	20.5	5.1
Vacant Units by Geography	10,334	13.8	35.0	30.8	17.0	3.4
Businesses by Geography	22,655	7.5	24.3	33.1	30.1	5.0
Farms by Geography	704	3.4	12.6	41.2	40.3	2.4
Family Distribution by Income Level	61,107	23.6	16.7	20.0	39.6	0.0
Household Distribution by Income Level	113,678	27.3	16.7	18.4	37.6	0.0
Median Family Income MSA - 29620 Lansing-East Lansing, MI MSA		\$78,657	Median Housing Value			\$149,036
			Median Gross Rent			\$918
			Families Below Poverty Level			10.1%
Source: 2020 U.S. Census and 2023 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.						

According to 2023 D&B data, the largest employment sectors in the assessment area are services; retail trade; and finance, insurance, and real estate. The area contains 22,655 businesses, of which 65.8 percent have four or fewer employees and 87.5 percent operate from a single location. Major employers within the area include the state of Michigan, Michigan State University, and University of Michigan Health/Sparrow Health.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units, of which 53.9 percent are owner-occupied. This assessment area also includes a large percentage of rental properties, 37.7 percent, because of the Michigan State University campus which limits homeownership opportunities. Although the 2020 U.S. Census data indicated a median housing value of \$149,036, housing prices have since increased making it more difficult for low- and even moderate-income borrowers to afford a home. Data from the Lansing State Journal indicated that the median home sales price was \$171,000 in Ingham County in 2023 and has continued to rise.

Data obtained from the U.S. Bureau of Labor Statistics is detailed in the following table. Unemployment rates in Ingham County were consistent with the state average but higher than the national average throughout the review period.

Unemployment Rates				
Area	2021	2022	2023	August 2024
	%	%	%	%
Ingham County	5.5	4.3	3.9	4.7
State of Michigan	5.7	4.1	3.9	4.5
National Average	5.3	3.6	3.6	4.2

Source: Bureau of Labor Statistics

Examiners utilized the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the assessment area during the evaluation period.

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)				
2021 (\$77,600)	<\$38,800	\$38,800 to <\$62,080	\$62,080 to <\$93,120	≥\$93,120
2022 (\$86,800)	<\$43,400	\$43,400 to <\$69,440	\$69,440 to <\$104,160	≥\$104,160
2023 (\$94,400)	<\$47,200	\$47,200 to <\$75,520	\$75,520 to <\$113,280	≥\$113,280
2024 (\$91,300)	<\$45,650	\$45,650 to <\$73,040	\$73,040 to <\$109,560	≥\$109,560

Source: FFIEC

Competition

The assessment area is highly competitive for financial services. According to the FDIC Deposit Market Share data as of June 30, 2024, 18 financial institutions operated 53 banking offices within the assessment area. Of these institutions, CB ranked 14th with a 1.1 percent deposit market share. The three most prominent institutions accounted for 58.1 percent of the deposit market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the assessment area. In 2023, 276 lenders originated or purchased a total of 5,038 home mortgage loans in the assessment area. CB ranked 98th with a market share of 0.1 percent. The five most prominent lenders accounted for 40.8 percent of the home mortgage lending market share.

The bank is not required to collect or report its small business lending data and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons to aggregate lending data. The aggregate lending data, however, reflects the level of competition for small business loans. Aggregate lending data for 2022, the most recent year available, shows 58 institutions originated 4,022 small business loans in the assessment area, indicating a moderate level of competition. The three most prominent lenders accounted for 64.7 percent of all originations.

Community Contact

Examiners interviewed two representatives from a local economic development organization. The contacts identified financing for small businesses and entrepreneurs as the greatest need in the area. Rising interest rates, inflation, a tight labor market, and tougher credit standards has created a challenging financing environment for small business owners. The contact expressed a need for low-interest loan programs for small businesses as an opportunity for financial institutions, and further indicated that collaboration with the local community development financial institution could assist with that effort.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined products targeted towards small businesses represent the primary credit need in the assessment area. Although examiners did not identify any major unmet credit or community development needs, there remains opportunities for these initiatives.

CONCLUSIONS ON PERFORMANCE CRITERIA IN LANSING-EAST LANSING, MI MSA ASSESSMENT AREA

LENDING TEST

The bank demonstrated reasonable performance in the Lansing MSA assessment area under the Lending Test. Geographic Distribution and Borrower Profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion of small business and home mortgage loans throughout the assessment area.

Small Business Loans

As shown in the following table, the geographic distribution of small business loans reflects reasonable dispersion within the assessment area. Bank performance exceeded the percentage of businesses in low- and moderate-income tracts in 2022. While CB did not make any loans to businesses in low-income tracts in 2023, its performance in moderate-income census tracts met the percentage of businesses in those tracts. When taken together, performance is reasonable.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2022	7.7	6	12.5	1,151	11.4
2023	7.5	0	0.0	0	0.0
Moderate					
2022	24.7	13	27.1	3,223	31.9
2023	24.3	8	24.2	518	12.0
Middle					
2022	32.7	26	54.2	5,310	52.6
2023	33.1	16	48.5	2,075	47.9
Upper					
2022	29.7	3	6.2	419	4.1
2023	30.1	7	21.2	915	21.1
Not Available					
2022	5.2	0	0.0	0	0.0
2023	5.0	2	6.1	820	18.9
Totals					
2022	100.0	48	100.0	10,103	100.0
2023	100.0	33	100.0	4,328	100.0

Source: 2022 & 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration throughout the assessment area. In 2022, the bank's performance in low-income tracts exceeded the percentage of owner-occupied housing units and aggregate HMDA data, while lending in moderate-income tracts was slightly below both comparators. The bank's performance in 2021, which is not presented in this evaluation, mirrored 2022.

CB only originated five home mortgage loans in the assessment area in 2023, which makes it difficult to draw a performance conclusion. While it did not originate any loans in low-income tracts, CB's performance in moderate-income tracts aligned with aggregate HMDA data and demographic data. Examiners primarily relied on 2021 and 2022 performance when arriving at conclusions and determined the bank's overall performance was reasonable. The following table shows the distribution of home mortgage loans compared with the percentage of owner-occupied housing units and aggregate HMDA data.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	4.7	5.2	2	15.4	160	6.5
2023	4.7	6.2	0	0.0	0	0.0
Moderate						
2022	20.9	22.1	2	15.4	345	14.0
2023	20.9	24.5	1	20.0	193	20.8
Middle						
2022	40.2	41.0	4	30.8	1,077	43.9
2023	40.2	39.2	3	60.0	549	59.3
Upper						
2022	34.1	31.4	5	38.5	872	35.5
2023	34.1	30.0	1	20.0	184	19.9
Not Available						
2022	0.1	0.3	0	0.0	0	0.0
2023	0.1	0.2	0	0.0	0	0.0
Totals						
2022	100.0	100.0	13	100.0	2,455	100.0
2023	100.0	100.0	5	100.0	926	100.0

Source: 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

Borrower Profile

The distribution of loans reflects reasonable penetration among businesses of different sizes and individuals of different income levels.

Small Business Loans

The distribution of loans reflects excellent penetration among businesses of different sizes. As shown in the following table, the bank's lending to businesses with GARs of \$1.0 million or less was relatively consistent with the percentage of businesses in 2022, while all 2023 small business loans in the assessment area were to businesses with GARs of \$1.0 million or less.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2022	82.5	38	79.2	7,169	71.0
2023	83.6	33	100.0	4,328	100.0
>\$1,000,000					
2022	5.0	10	20.8	2,934	29.0
2023	4.6	0	0.0	0	0.0
Revenue Not Available					
2022	12.6	0	0.0	0	0.0
2023	11.8	0	0.0	0	0.0
Totals					
2022	100.0	48	100.0	10,103	100.0
2023	100.0	33	100.0	4,328	100.0
Source: 2022 & 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels, considering the limited number of originations and high percentage of loans with no income information. While the bank's lending to low-income borrowers compares unfavorably to aggregate lending data and the percentage of low-income families in both years, 10.1 percent of families in the low-income category live below the poverty level. These families are unlikely to qualify for and be able to service debt in amounts sufficient to afford homes in the area. Additionally increased home prices, strong competition, and the relatively high percentage of rental properties further limits lending opportunities within the low-income segment of the population. Considering these factors, performance is reasonable. Lending to moderate-income borrowers aligned more closely with aggregate HMDA and demographic data and, as a percent of loans, improved between 2022 and 2023.

The following table shows the bank's performance by income category and includes the percentage of families within each income level as well as aggregate HMDA data.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	23.6	14.1	1	7.7	185	7.5
2023	23.6	14.5	0	0.0	0	0.0
Moderate						
2022	16.7	24.5	2	15.4	200	8.1
2023	16.7	24.5	2	40.0	296	31.9
Middle						
2022	20.0	22.0	1	7.7	138	5.6
2023	20.0	22.5	1	20.0	253	27.3
Upper						
2022	39.6	27.6	1	7.7	175	7.1
2023	39.6	26.4	1	20.0	184	19.9
Not Available						
2023	0.0	11.7	8	61.5	1,757	71.6
2023	0.0	12.1	1	20.0	193	20.8
Totals						
2022	100.0	100.0	13	100.0	2,455	100.0
2023	100.0	100.0	5	100.0	926	100.0

Source: 2020 U.S. Census; Bank Data, 2022-2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

COMMUNITY DEVELOPMENT TEST

CB demonstrates adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of opportunities.

Community Development Loans

CB originated six community development loans totaling approximately \$1.6 million during the evaluation period. The following table summarizes the bank's community development lending in the assessment area by year and purpose.

Community Development Lending										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
2021 (Partial)	0	0	0	0	0	0	0	0	0	0
2022	2	1,036	0	0	0	0	1	139	3	1,175
2023	0	0	0	0	0	0	3	417	3	417
2024 (YTD)	0	0	0	0	0	0	0	0	0	0
Total	2	1,036	0	0	0	0	4	556	6	1,592

Source: Bank Data

Notable examples of community development lending in the assessment area include:

- In 2022, a \$500,000 loan to an organization focused on creating affordable housing, down payment assistance grants, and housing education to low- and moderate-income individuals in the assessment area.
- In 2022, a \$536,000 refinance loan to purchase additional property to convert apartments for refugees arriving in America who have little to no income.

Qualified Investments

CB made qualified investments and donations totaling approximately \$4.5 million during the evaluation period. All qualified investments were mortgage-backed securities comprised of loans to low- and moderate-income individuals in the assessment area. The bank also made three donations totaling \$30,000 to an affordable housing organization focused on creating affordable housing, providing homeownership counseling, and downpayment assistance through grants in the area.

Qualified Investments by Year Assessment Area: Lansing MSA										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Prior Period	3	1,163	0	0	0	0	0	0	3	1,163
2021 (Partial)	1	750	0	0	0	0	0	0	1	750
2022	0	0	0	0	0	0	0	0	0	0
2023	3	1,404	0	0	0	0	0	0	3	1,404
2024 (YTD)	2	1,168	0	0	0	0	0	0	2	1,168
Subtotal	9	4,486	0	0	0	0	0	0	9	4,486
Grants & Donations	4	30	4	5	0	0	0	0	8	36
Total	13	4,516	4	5	0	0	0	0	17	4,522

Source: Bank Data

Community Development Services

CB staff provided 13 instances of community development services across four organizations in the assessment area during the evaluation period. The following table details the bank's community development services by year and purpose. All community service activities resulted from institution employees providing financial literacy education at local schools where over half the student population qualified for free or reduced cost lunches, and first-time home buyer education courses.

Community Development Services					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
2021 (Partial)	0	0	0	0	0
2022	0	1	0	0	1
2023	0	4	0	0	4
2024 (YTD)	0	8	0	0	8
Total	0	13	0	0	13

Source: Bank Data

GRAND RAPIDS-KENTWOOD, MI MSA ASSESSMENT AREA – Full-Scope Review

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

This assessment area consisted of the entirety of Montcalm and Ottawa counties prior to 2024, and consists of Montcalm, Ottawa, and Barry counties in 2024 given the county designation changes discussed previously. CB operates two full-service branches within this assessment area, one in Montcalm County and one in Ottawa County. As mentioned previously, the branch in Barry County was included in the Non-MSA assessment area.

Economic and Demographic Data

The assessment area consists of 79 census tracts with the following income designations: two low-income, 14 moderate-income, 42 middle-income, 19 upper-income, and two with no income designation. The following table illustrates select demographic characteristics based on 2020 U.S. Census data.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	79	2.5	17.7	53.2	24.1	2.5
Population by Geography	362,814	3.5	17.9	53.0	24.7	0.9
Housing Units by Geography	139,223	1.7	19.4	55.4	22.0	1.5
Owner-Occupied Units by Geography	101,217	0.1	17.8	53.9	26.5	1.6
Occupied Rental Units by Geography	27,512	7.9	19.4	63.1	9.0	0.5
Vacant Units by Geography	10,494	1.3	34.5	49.1	13.0	2.2
Businesses by Geography	23,521	0.4	17.3	58.0	22.8	1.4
Farms by Geography	1,241	0.1	19.8	53.1	26.4	0.6
Family Distribution by Income Level	91,356	17.0	19.0	23.9	40.1	0.0
Household Distribution by Income Level	128,729	20.9	16.3	20.6	42.2	0.0
Median Family Income MSA - 24340 Grand Rapids-Kentwood, MI MSA		\$80,705	Median Housing Value			\$190,204
			Median Gross Rent			\$893
			Families Below Poverty Level			5.3%
Source: 2020 U.S. Census and 2023 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 largest employment sectors in the assessment area are services; retail trade; finance, insurance, and real estate; and construction. The area contains 22,267 businesses, of which 65.7 percent have four or fewer employees and 90.0 percent operate from a single location. Major employers within the area include Spectrum Health United & Kelsey Hospitals, Sparrow Carson Hospital, Gentex Corporation, and MillerKnoll.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units, of which 72.7 percent are owner-occupied. 2020 U.S. Census data indicates a median housing value of \$190,204; however, home prices have since increased making it difficult for low- and even moderate-income borrowers to afford a home.

Data obtained from the U.S. Bureau of Labor Statistics is detailed in the following table. Unemployment rates in Montcalm County were generally consistent with the state average but mostly higher than the national average throughout the review period. Conversely, unemployment rates in Ottawa County were lower than both the state and national averages.

Unemployment Rates				
Area	2021	2022	2023	August 2024
	%	%	%	%
Montcalm County	5.5	4.4	4.3	5.1
Ottawa County	4.0	3.2	3.0	3.8
State of Illinois	5.7	4.1	3.9	4.5
National Average	5.3	3.6	3.6	4.2

Source: Bureau of Labor Statistics

Examiners utilized the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories for the assessment area during the evaluation period.

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)				
2021 (\$76,600)	<\$38,300	\$38,300 to <\$61,280	\$61,280 to <\$91,920	≥\$91,920
2022 (\$88,900)	<\$44,450	\$44,450 to <\$71,120	\$71,120 to <\$106,680	≥\$106,680
2023 (\$97,500)	<\$48,750	\$48,750 to <\$78,000	\$78,000 to <\$117,000	≥\$117,000
2024 (\$97,600)	<\$48,800	\$48,800 to <\$78,080	\$78,080 to <\$117,120	≥\$117,120

Source: FFIEC

Competition

The assessment area is highly competitive in the market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2024, 17 financial institutions operated 80 banking offices within the assessment area. Of these institutions, CB ranked 14th with a 0.6 percent deposit market share. The three most prominent institutions accounted for 62.8 percent of the total deposit market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2023, 301 lenders originated or purchased a total of 8,852 home mortgage loans in the assessment area. CB ranked 154th with a market share of 0.03 percent. The five most prominent lenders accounted for 38.6 percent of the home mortgage market share.

The bank is not required to collect or report its small business lending data and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons to aggregate lending data. The aggregate lending data, however, reflects the level of competition for small business loans. Aggregate lending data for 2022, the most recent year available, shows 59 institutions originated 5,944 small business loans in the assessment area, indicating a high level of competition. The five most prominent lenders accounted for 62.5 percent of the market share.

Community Contacts

Examiners contacted a representative from a local community foundation. The contact stated that local economic conditions are relatively strong with companies hiring area residents. Additionally, the contact identified a need for affordable housing for low- and moderate-income individuals, as housing prices have out-paced individual earnings; and lending in manufacturing industries, as this is the major employment sector for area residents.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that affordable housing and small business lending are the primary credit needs of the assessment area. Although examiners did not identify any major unmet credit or community development needs, there remains opportunities for affordable housing and small business loans.

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

LENDING TEST

CB demonstrated reasonable performance under the Lending Test. Excellent Geographic Distribution and reasonable Borrower Profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the assessment area. The bank's excellent performance in both small business and home mortgage lending supports the overall conclusion.

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the assessment area. While CB did not originate any small business loans in low-income census tracts, only 0.4 percent of small businesses are in low-income tracts indicating minimal demand. As shown in the following table, CB's performance in moderate-income tracts far exceeded the percentage of businesses located in those tracts.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2022	0.4	0	0.0	0	0.0
2023	0.4	0	0.0	0	0.0
Moderate					
2022	17.3	25	71.4	2,585	72.3
2023	17.3	42	76.4	5,000	78.7
Middle					
2022	58.1	9	25.7	863	24.2
2023	58.0	11	20.0	1,333	21.0
Upper					
2022	22.7	1	2.9	125	3.5
2023	22.8	2	3.6	21	0.3
Not Available					
2022	1.4	0	0.0	0	0.0
2023	1.4	0	0.0	0	0.0
Totals					
2022	100.0	35	100.0	3,573	100.0
2023	100.0	55	100.0	6,354	100.0

Source: 2022 & 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The geographic distribution of loans reflects excellent dispersion throughout the assessment area. Only one census tract in the assessment area is low-income so examiners focused on performance in moderate-income census tracts. While the bank had a limited volume of lending in this assessment area during the evaluation period, nearly all originations occurred in moderate-income census tracts with bank performance far surpassing aggregate HMDA and demographic lending data. The following table details the geographic distribution of home mortgage loans.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	0.1	0.2	0	0.0	0	0.0
2023	0.1	0.4	0	0.0	0	0.0
Moderate						
2022	17.8	16.4	7	87.5	1,197	75.0
2023	17.8	17.0	3	100.0	655	100.0
Middle						
2022	53.9	53.7	1	12.5	399	25.0
2023	53.9	53.3	0	0.0	0	0.0
Upper						
2022	26.5	28.4	0	0.0	0	0.0
2023	26.5	27.8	0	0.0	0	0.0
Not Available						
2022	1.6	1.3	0	0.0	0	0.0
2023	1.6	1.4	0	0.0	0	0.0
Totals						
2022	100.0	100.0	8	100.0	1,597	100.0
2023	100.0	100.0	3	100.0	655	100.0

Source: 2020 U.S. Census; Bank Data, 2022 & 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

Borrower Profile

The distribution of loans reflects reasonable penetration among businesses of different sizes and borrowers of different income levels.

Small Business Loans

The distribution of loans reflects reasonable penetration among businesses of different sizes. As shown in the following table, the bank's lending to businesses with GARs of \$1.0 million or less was slightly below the percentage of businesses in both years reviewed but still reasonable as many smaller businesses tend to seek alternate forms of financing such as credit cards or home equity lines of credit, therefore reducing demand for traditional small business loans.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2022	84.8	27	77.1	2,742	76.7
2023	85.3	35	63.6	4,011	63.1
>\$1,000,000					
2022	5.6	7	20.0	621	17.4
2023	5.3	20	36.4	2,343	36.9
Revenue Not Available					
2022	9.6	1	2.9	210	5.9
2023	9.4	0	0.0	0	0.0
Totals					
2022	100.0	35	100.0	3,573	100.0
2023	100.0	55	100.0	6,354	100.0

Source: 2022 & 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels, given the limited volume of originations. As shown in the following table, the bank did not originate any loans to low-income borrowers but lending performance among moderate-income borrowers surpassed aggregate lending performance and the percentage of moderate-income borrowers. Considering the limited level of lending, strong competition, and community contact statements that affordable housing is needed for the lower income population, examiners determined that performance is reasonable.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	17.0	11.1	0	0.0	0	0.0
2023	17.0	9.5	0	0.0	0	0.0
Moderate						
2022	19.0	23.8	2	25.0	153	9.6
2023	19.0	22.5	1	33.3	212	32.4
Middle						
2022	23.9	24.3	2	25.0	302	18.9
2023	23.9	25.6	0	0.0	0	0.0
Upper						
2022	40.1	31.3	4	50.0	1,142	71.5
2023	40.1	31.6	1	33.3	247	37.7
Not Available						
2022	0.0	9.5	0	0.0	0	0.0
2023	0.0	10.8	1	33.3	196	29.9
Totals						
2022	100.0	100.0	8	100.0	1,597	100.0
2023	100.0	100.0	3	100.0	655	100.0
Source: 2020 U.S. Census; Bank Data, 2022 & 2023 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%						

COMMUNITY DEVELOPMENT TEST

CB demonstrates adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments, and community development services. Examiners considered the institutions capacity and the need and availability of opportunities.

Community Development Loans

CB originated one community development loans totaling approximately \$350,000 during the evaluation period. The loan proceeds when towards financing a housing development in partnership with the state of Michigan where 50.0 percent of units will be set aside for low- and moderate-income individuals for five years.

Qualified Investments

CB had qualified investments and donations totaling approximately \$3.3 million during the evaluation period. All qualified investments were mortgage-backed securities comprised of loans to low- and moderate-income individuals in the assessment area.

Qualified Investments by Year										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
Prior Period	2	90	0	0	0	0	0	0	2	90
2021 (Partial)	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0
2023	3	1,861	0	0	0	0	0	0	3	1,861
2024 (YTD)	2	1,316	0	0	0	0	0	0	2	1,316
Subtotal	7	3,267	0	0	0	0	0	0	7	3,267
Grants & Donations	0	0	2	3	0	0	0	0	2	3
Total	7	3,267	2	3	0	0	0	0	9	3,270

Source: Bank Data

Community Development Services

CB staff provided seven instances of community development services across three organizations, in the assessment area during the evaluation period. Services included providing financial and technical expertise to organizations that provide affordable housing and community-based services for low- and moderate-income students and residents. The following table details the bank's community development services by year and purpose.

Community Development Services					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
2021 (Partial)	0	0	0	0	0
2022	1	1	0	0	2
2023	1	1	0	0	2
2024 (YTD)	2	1	0	0	3
Total	4	3	0	0	7

Source: Bank Data

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. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution 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 institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution'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 institution's assessment area(s) or a broader statewide or regional area including the institution'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 institution'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 line of credits 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.

2025 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**

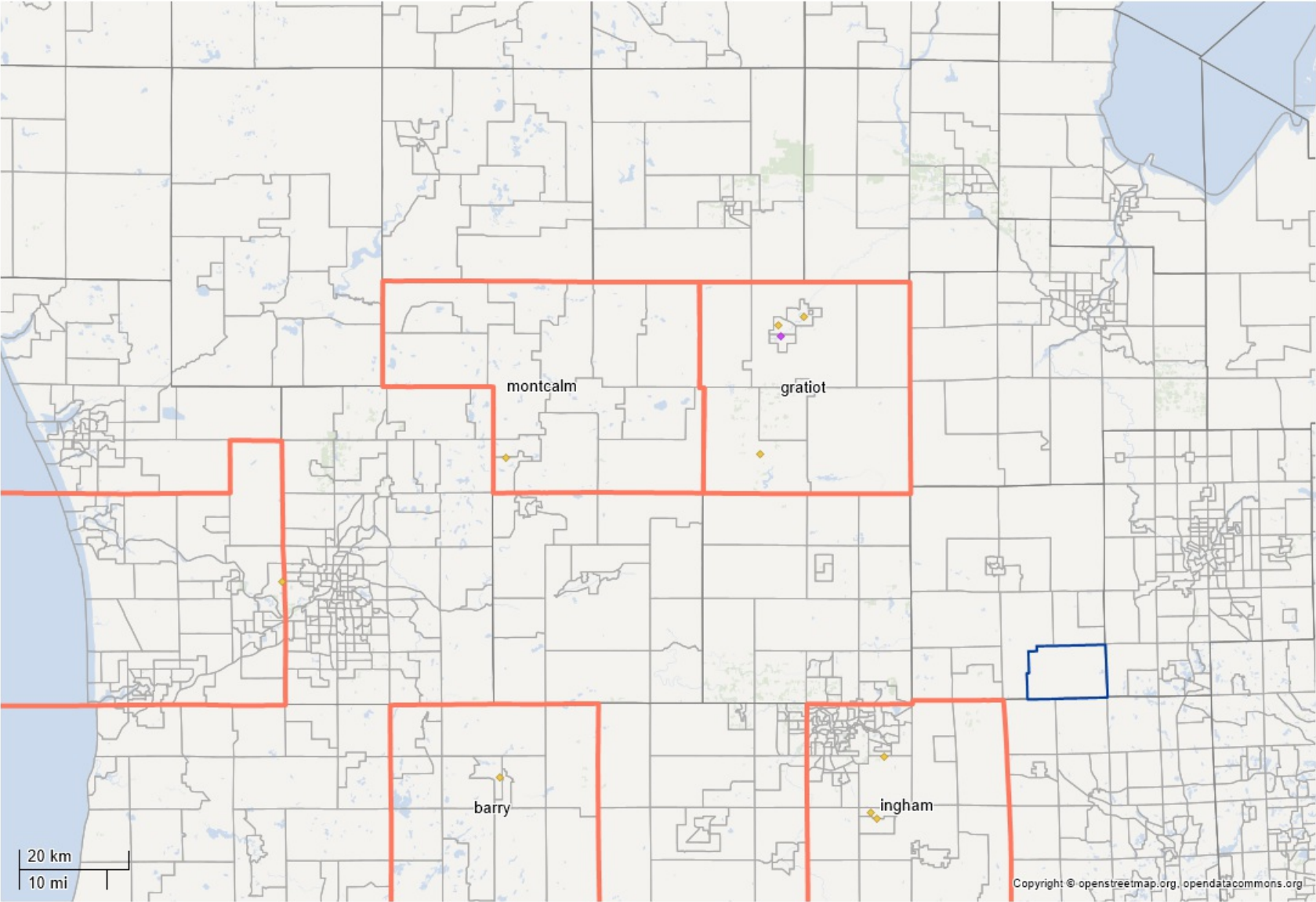
101 N. Newton St.
Middleton, MI 48856
Gratiot County
989-236-7236
Monday - Friday: 8:30 am - 5:00 pm
DRIVE-THRU
Monday - Friday: 8:30 am - 5:00 pm
Saturday 9:00 am - 12:00 pm

2025 OFFICES AND HOURS (continued)	CENSUS TRACT
SAINT LOUIS 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	0003.00
MASON - Jefferson St. 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	0063.01
MASON - Cedar St. 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	0063.01
OKEMOS 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	0050.03
Grand Rapids O-240 Lake Michigan Drive NW Grand Rapids, MI 49534 Ottawa County 616-367-3000 Monday - Friday: 8:30 am - 5:00 pm	0214.01
ALMA - State St. - LPO, Safe Deposit Boxes and ATM 301 N. State St. Gratiot County 989-463-2185 Monday - Friday: 8:30 am - 5:00 pm	0006.00

BRANCH LOCATIONS OPENED OR CLOSED IN LAST TWO YEARS

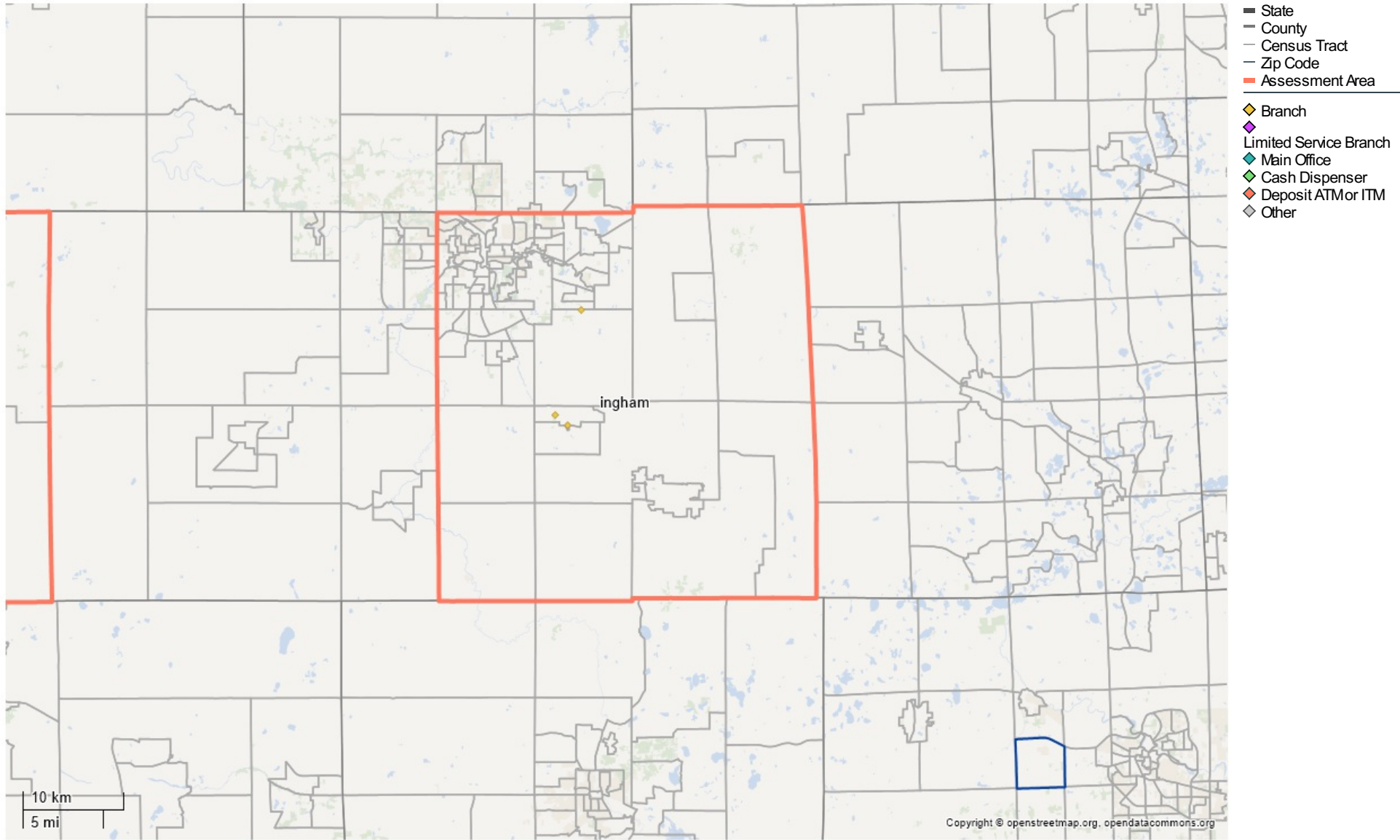
6/3/2024

On 6/3/2024 a full service branch located at O-240 Lake Michigan Drive NW, Grand Rapids, MI 49534 in Ottawa County was opened.



Applied Filters

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

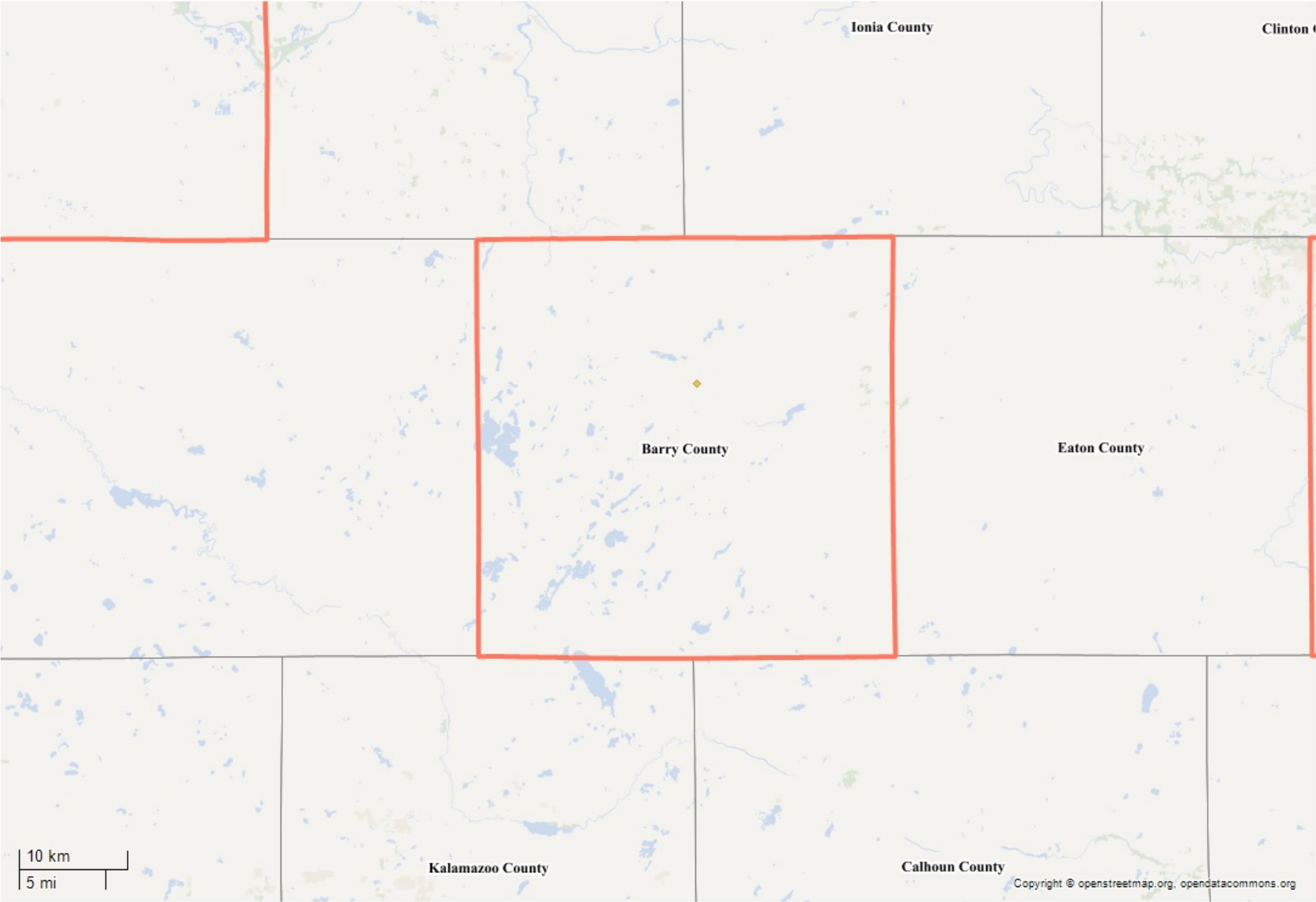


Applied Filters

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

Commercial Bank (MI)

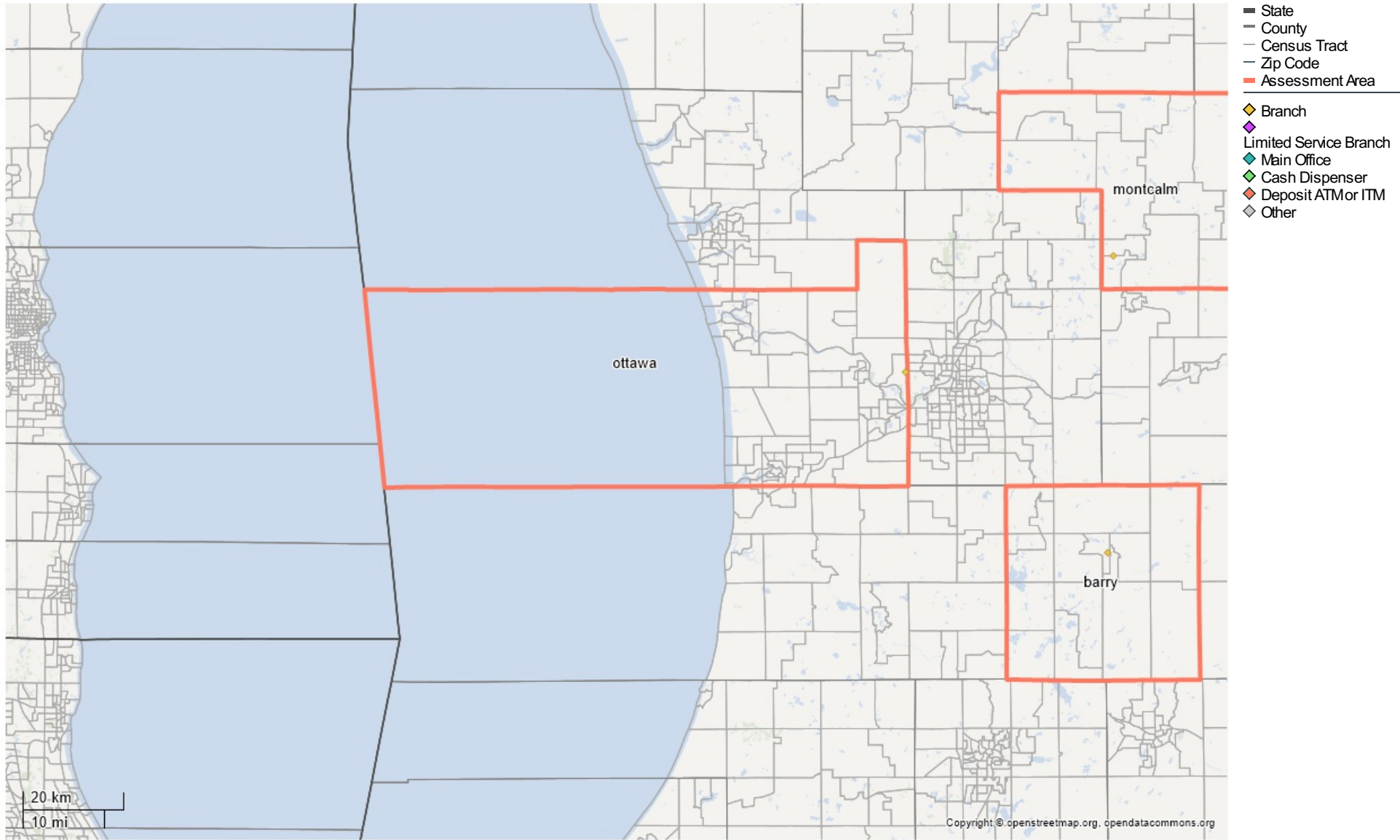
Barry County



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



Applied Filters

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



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 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	94.95	\$78,300	\$74,346	\$59,861	3957	8.16	323	1438	1779
26	057	0002.00	Upper	No	123.82	\$78,300	\$96,951	\$78,060	4970	8.85	440	1763	2072
26	057	0003.00	Middle	No	81.97	\$78,300	\$64,183	\$51,681	5058	16.96	858	1321	1732
26	057	0004.00	Unknown	No	0.00	\$78,300	\$0	\$0	3205	56.88	1823	0	0
26	057	0005.00	Moderate	No	79.69	\$78,300	\$62,397	\$50,243	5792	21.56	1249	1099	1733
26	057	0006.00	Middle	No	80.98	\$78,300	\$63,407	\$51,057	4173	21.14	882	1124	1654
26	057	0007.00	Middle	No	105.88	\$78,300	\$82,904	\$66,750	3128	9.21	288	1110	1388
26	057	0008.00	Middle	No	115.95	\$78,300	\$90,789	\$73,102	4204	8.66	364	1295	1759
26	057	0009.00	Middle	No	95.17	\$78,300	\$74,518	\$60,000	3396	8.01	272	1137	1496
26	057	0010.00	Middle	No	95.83	\$78,300	\$75,035	\$60,417	3878	11.60	450	1163	1499

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 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	74.63	\$97,600	\$72,839	\$59,402	4195	6.65	279	1410	1971
26	117	9702.00	Moderate	No	62.68	\$97,600	\$61,176	\$49,890	3655	10.73	392	1058	1403
26	117	9703.00	Middle	No	80.31	\$97,600	\$78,383	\$63,924	3327	6.88	229	1237	1879
26	117	9704.00	Moderate	No	65.22	\$97,600	\$63,655	\$51,915	3495	9.10	318	987	1622
26	117	9705.01	Middle	No	86.57	\$97,600	\$84,492	\$68,906	4631	9.22	427	1372	1890
26	117	9705.02	Moderate	No	78.11	\$97,600	\$76,235	\$62,175	3264	8.00	261	1070	1570
26	117	9706.00	Middle	No	86.48	\$97,600	\$84,404	\$68,839	5271	8.10	427	1786	2649
26	117	9707.00	Middle	No	80.09	\$97,600	\$78,168	\$63,750	5220	7.18	375	1757	2399
26	117	9708.00	Moderate	No	70.80	\$97,600	\$69,101	\$56,354	4478	7.41	332	1377	2132
26	117	9709.00	Moderate	No	75.59	\$97,600	\$73,776	\$60,167	3168	7.64	242	1066	1864
26	117	9710.00	Moderate	No	71.99	\$97,600	\$70,262	\$57,300	9542	28.61	2730	1265	1888
26	117	9711.00	Middle	No	84.96	\$97,600	\$82,921	\$67,625	5191	10.79	560	1799	2293
26	117	9712.00	Moderate	No	69.82	\$97,600	\$68,144	\$55,580	5847	10.54	616	1816	2087
26	117	9713.00	Moderate	No	74.74	\$97,600	\$72,946	\$59,492	5330	10.24	546	1248	1732

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26	065	0001.00	Low	No	48.85	\$91,300	\$44,600	\$38,841	1804	39.02	704	656	937
26	065	0004.00	Moderate	No	75.24	\$91,300	\$68,694	\$59,821	2762	42.36	1170	803	1335
26	065	0006.00	Moderate	No	60.69	\$91,300	\$55,410	\$48,250	1605	45.17	725	97	806
26	065	0007.00	Low	No	27.96	\$91,300	\$25,527	\$22,230	2464	49.11	1210	214	1175
26	065	0008.00	Moderate	No	52.30	\$91,300	\$47,750	\$41,577	2814	57.50	1618	383	952
26	065	0010.00	Middle	No	103.38	\$91,300	\$94,386	\$82,188	2047	26.77	548	659	1125
26	065	0012.00	Low	No	33.47	\$91,300	\$30,558	\$26,615	1958	48.37	947	307	1017
26	065	0017.03	Middle	No	88.32	\$91,300	\$80,636	\$70,218	4251	49.66	2111	1420	1778
26	065	0020.00	Low	No	39.56	\$91,300	\$36,118	\$31,450	3063	54.65	1674	425	1212
26	065	0021.01	Moderate	No	67.37	\$91,300	\$61,509	\$53,563	1863	55.45	1033	444	785
26	065	0022.00	Middle	No	93.81	\$91,300	\$85,649	\$74,583	1494	23.49	351	676	834
26	065	0023.00	Moderate	No	53.25	\$91,300	\$48,617	\$42,338	3405	32.66	1112	1051	1544
26	065	0026.00	Moderate	No	65.33	\$91,300	\$59,646	\$51,941	1953	40.50	791	555	772
26	065	0027.00	Moderate	No	61.16	\$91,300	\$55,839	\$48,621	3049	43.16	1316	1004	1335
26	065	0028.00	Middle	No	83.43	\$91,300	\$76,172	\$66,331	2430	32.02	778	889	1146
26	065	0029.01	Middle	No	93.81	\$91,300	\$85,649	\$74,583	2872	41.30	1186	893	1205
26	065	0029.02	Moderate	No	64.29	\$91,300	\$58,697	\$51,111	3805	50.51	1922	117	361
26	065	0031.03	Middle	No	91.32	\$91,300	\$83,375	\$72,604	5933	30.57	1814	1536	2056
26	065	0032.00	Low	No	43.93	\$91,300	\$40,108	\$34,926	2055	45.69	939	493	881
26	065	0033.01	Moderate	No	79.37	\$91,300	\$72,465	\$63,099	3006	48.04	1444	752	1097
26	065	0033.02	Middle	No	102.10	\$91,300	\$93,217	\$81,172	2231	33.71	752	817	915
26	065	0034.00	Middle	No	90.64	\$91,300	\$82,754	\$72,061	2402	34.76	835	719	822
26	065	0035.00	Moderate	No	55.55	\$91,300	\$50,717	\$44,167	2862	40.39	1156	797	1144
26	065	0036.01	Moderate	No	60.84	\$91,300	\$55,547	\$48,373	3840	70.23	2697	999	1423
26	065	0036.02	Moderate	No	64.20	\$91,300	\$58,615	\$51,039	3410	65.48	2233	519	1254
26	065	0037.00	Moderate	No	65.71	\$91,300	\$59,993	\$52,241	5149	54.65	2814	1150	2016

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26	065	0038.01	Upper	No	141.94	\$91,300	\$129,591	\$112,841	4079	35.13	1433	1090	1424
26	065	0038.02	Middle	No	96.61	\$91,300	\$88,205	\$76,806	4152	38.10	1582	763	803
26	065	0039.01	Upper	No	222.02	\$91,300	\$202,704	\$176,500	2101	22.61	475	589	731
26	065	0039.02	Upper	No	129.68	\$91,300	\$118,398	\$103,097	4126	24.87	1026	599	1158
26	065	0040.00	Upper	No	149.64	\$91,300	\$136,621	\$118,961	4560	20.90	953	854	1030
26	065	0041.00	Unknown	No	0.00	\$91,300	\$0	\$0	4566	15.70	717	69	622
26	065	0043.01	Middle	No	115.76	\$91,300	\$105,689	\$92,029	4505	22.24	1002	964	1676
26	065	0043.02	Unknown	No	0.00	\$91,300	\$0	\$0	2708	30.65	830	17	93
26	065	0044.02	Moderate	No	52.58	\$91,300	\$48,006	\$41,806	325	83.38	271	8	28
26	065	0044.03	Moderate	No	78.84	\$91,300	\$71,981	\$62,679	2364	36.84	871	251	336
26	065	0044.90	Unknown	No	0.00	\$91,300	\$0	\$0	3914	25.09	982	0	0
26	065	0044.91	Unknown	No	0.00	\$91,300	\$0	\$0	1210	36.20	438	0	0
26	065	0044.92	Unknown	No	0.00	\$91,300	\$0	\$0	3415	36.25	1238	0	0
26	065	0044.93	Unknown	No	0.00	\$91,300	\$0	\$0	1617	45.52	736	0	0
26	065	0044.94	Unknown	No	0.00	\$91,300	\$0	\$0	3357	41.91	1407	0	0
26	065	0045.00	Middle	No	81.12	\$91,300	\$74,063	\$64,490	3781	38.11	1441	584	1050
26	065	0046.00	Upper	No	195.40	\$91,300	\$178,400	\$155,345	4337	21.65	939	1622	1764
26	065	0047.00	Upper	No	143.15	\$91,300	\$130,696	\$113,804	2864	15.68	449	923	1328
26	065	0048.01	Middle	No	90.86	\$91,300	\$82,955	\$72,232	4345	24.33	1057	808	1061
26	065	0048.02	Upper	No	151.29	\$91,300	\$138,128	\$120,272	3236	16.41	531	1105	1197
26	065	0049.02	Middle	No	106.29	\$91,300	\$97,043	\$84,500	5321	36.68	1952	783	967
26	065	0049.03	Upper	No	139.53	\$91,300	\$127,391	\$110,927	2616	52.41	1371	399	548
26	065	0049.04	Upper	No	147.67	\$91,300	\$134,823	\$117,399	4648	25.62	1191	1289	1444
26	065	0050.02	Upper	No	187.18	\$91,300	\$170,895	\$148,804	4103	24.47	1004	1223	1280
26	065	0050.03	Upper	No	175.74	\$91,300	\$160,451	\$139,712	4217	46.91	1978	1048	1202
26	065	0050.04	Upper	No	131.46	\$91,300	\$120,023	\$104,514	3899	42.29	1649	906	1062
26	065	0051.00	Moderate	No	70.00	\$91,300	\$63,910	\$55,649	3288	60.58	1992	815	1175
26	065	0052.01	Moderate	No	55.64	\$91,300	\$50,799	\$44,233	5617	58.13	3265	1083	2199
26	065	0052.02	Upper	No	135.96	\$91,300	\$124,131	\$108,088	3720	28.98	1078	1020	1232

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26	065	0053.03	Moderate	No	74.82	\$91,300	\$68,311	\$59,487	4673	44.81	2094	1054	1472
26	065	0053.04	Moderate	No	70.40	\$91,300	\$64,275	\$55,969	3148	59.78	1882	557	848
26	065	0053.05	Upper	No	130.39	\$91,300	\$119,046	\$103,664	3564	26.57	947	947	983
26	065	0053.06	Middle	No	84.63	\$91,300	\$77,267	\$67,281	3826	36.85	1410	614	1124
26	065	0054.01	Middle	No	93.69	\$91,300	\$85,539	\$74,487	3596	22.83	821	907	1313
26	065	0054.02	Moderate	No	69.63	\$91,300	\$63,572	\$55,357	3421	23.06	789	820	1207
26	065	0055.01	Upper	No	125.92	\$91,300	\$114,965	\$100,104	5974	20.72	1238	2270	2492
26	065	0055.02	Middle	No	118.92	\$91,300	\$108,574	\$94,544	6473	23.17	1500	1650	1953
26	065	0056.00	Middle	No	117.50	\$91,300	\$107,278	\$93,409	2912	12.74	371	915	1117
26	065	0057.00	Upper	No	155.29	\$91,300	\$141,780	\$123,456	5120	9.69	496	1678	1894
26	065	0058.00	Upper	No	161.99	\$91,300	\$147,897	\$128,780	5650	10.80	610	1927	2265
26	065	0059.00	Upper	No	129.94	\$91,300	\$118,635	\$103,304	5600	8.16	457	1668	2044
26	065	0060.01	Middle	No	100.24	\$91,300	\$91,519	\$79,688	3539	9.38	332	1109	1349
26	065	0060.02	Middle	No	105.55	\$91,300	\$96,367	\$83,917	3533	10.02	354	1247	1526
26	065	0061.00	Middle	No	104.14	\$91,300	\$95,080	\$82,791	4232	10.07	426	1419	1652
26	065	0062.00	Middle	No	103.00	\$91,300	\$94,039	\$81,882	5390	10.07	543	1615	1829
26	065	0063.01	Middle	No	100.01	\$91,300	\$91,309	\$79,508	4738	14.27	676	1400	1701
26	065	0063.02	Middle	No	97.48	\$91,300	\$88,999	\$77,500	4159	11.47	477	1169	1153
26	065	0064.01	Middle	No	108.53	\$91,300	\$99,088	\$86,286	4354	12.17	530	1456	1698
26	065	0064.02	Middle	No	106.92	\$91,300	\$97,618	\$85,000	2997	9.54	286	970	1167
26	065	0065.00	Moderate	No	53.03	\$91,300	\$48,416	\$42,163	3457	36.51	1262	722	1609
26	065	0066.00	Low	No	40.63	\$91,300	\$37,095	\$32,305	2864	46.68	1337	290	905
26	065	0067.00	Moderate	No	76.08	\$91,300	\$69,461	\$60,487	3819	62.11	2372	741	1634
26	065	0068.00	Low	No	48.96	\$91,300	\$44,700	\$38,929	3720	57.20	2128	751	1602
26	065	0070.00	Middle	No	82.40	\$91,300	\$75,231	\$65,509	5725	34.13	1954	1784	2655
26	065	9800.00	Unknown	No	0.00	\$91,300	\$0	\$0	859	34.92	300	0	11
26	065	9801.00	Unknown	No	0.00	\$91,300	\$0	\$0	19	47.37	9	12	12
26	065	9802.00	Unknown	No	0.00	\$91,300	\$0	\$0	15	53.33	8	0	0

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26	065	9803.00	Unknown	No	0.00	\$91,300	\$0	\$0	5	40.00	2	0	0

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26	015	0101.00	Middle	No	82.17	\$97,600	\$80,198	\$65,405	5509	8.40	463	2031	2714
26	015	0102.00	Middle	No	101.37	\$97,600	\$98,937	\$80,688	6102	8.46	516	2012	2420
26	015	0103.01	Middle	No	94.10	\$97,600	\$91,842	\$74,901	3939	12.24	482	1009	1220
26	015	0103.02	Upper	No	133.48	\$97,600	\$130,276	\$106,250	5392	9.42	508	1422	1737
26	015	0104.01	Middle	No	102.83	\$97,600	\$100,362	\$81,848	3398	10.21	347	1209	1927
26	015	0104.03	Upper	No	120.70	\$97,600	\$117,803	\$96,071	3089	7.54	233	1250	1731
26	015	0104.04	Middle	No	90.21	\$97,600	\$88,045	\$71,806	2233	12.14	271	431	649
26	015	0105.00	Middle	No	109.30	\$97,600	\$106,677	\$87,000	3334	10.62	354	1305	1771
26	015	0106.01	Middle	No	109.56	\$97,600	\$106,931	\$87,208	3367	9.09	306	1282	1824
26	015	0106.02	Middle	No	104.76	\$97,600	\$102,246	\$83,385	3204	8.46	271	1199	1641
26	015	0107.00	Middle	No	91.69	\$97,600	\$89,489	\$72,981	4788	6.95	333	1783	2380
26	015	0108.00	Middle	No	93.44	\$97,600	\$91,197	\$74,375	3405	5.93	202	1139	1421
26	015	0113.01	Middle	No	81.83	\$97,600	\$79,866	\$65,137	4419	10.59	468	1229	1628
26	015	0113.02	Middle	No	84.52	\$97,600	\$82,492	\$67,275	3745	7.66	287	1163	1480
26	015	0114.01	Upper	No	138.46	\$97,600	\$135,137	\$110,208	2763	10.24	283	771	991
26	015	0114.02	Upper	No	122.76	\$97,600	\$119,814	\$97,714	3736	8.57	320	1205	1580

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 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	104.40	\$97,600	\$101,894	\$83,101	5286	9.25	489	1728	2058
26	139	0202.00	Middle	No	85.09	\$97,600	\$83,048	\$67,734	4828	12.47	602	1139	1312
26	139	0204.00	Middle	No	106.55	\$97,600	\$103,993	\$84,813	4572	9.21	421	1513	1896
26	139	0205.01	Middle	No	101.90	\$97,600	\$99,454	\$81,111	3625	9.85	357	907	1240
26	139	0205.03	Upper	No	142.42	\$97,600	\$139,002	\$113,364	3847	10.01	385	1357	1623
26	139	0205.04	Middle	No	102.44	\$97,600	\$99,981	\$81,537	2627	9.52	250	850	1025
26	139	0206.00	Unknown	No	0.00	\$97,600	\$0	\$0	3317	9.38	311	1664	1931
26	139	0209.00	Middle	No	96.87	\$97,600	\$94,545	\$77,109	4623	11.05	511	1395	2270
26	139	0210.00	Middle	No	89.21	\$97,600	\$87,069	\$71,010	5614	9.49	533	1927	2607
26	139	0211.00	Middle	No	105.58	\$97,600	\$103,046	\$84,036	4920	7.64	376	1876	2208
26	139	0212.01	Upper	No	129.67	\$97,600	\$126,558	\$103,214	6016	13.26	798	1833	2024
26	139	0212.03	Middle	No	107.43	\$97,600	\$104,852	\$85,513	4036	11.69	472	1279	1572
26	139	0212.04	Middle	No	94.38	\$97,600	\$92,115	\$75,122	3004	14.38	432	671	806
26	139	0213.01	Middle	No	104.01	\$97,600	\$101,514	\$82,792	3343	9.27	310	1035	1092
26	139	0213.03	Upper	No	123.13	\$97,600	\$120,175	\$98,011	2737	12.86	352	738	831
26	139	0213.04	Upper	No	138.98	\$97,600	\$135,644	\$110,625	5936	8.71	517	1998	2153
26	139	0214.01	Middle	No	96.28	\$97,600	\$93,969	\$76,636	3441	12.06	415	1008	1273
26	139	0214.02	Middle	No	117.67	\$97,600	\$114,846	\$93,661	5361	7.95	426	1515	1550
26	139	0215.01	Middle	No	96.67	\$97,600	\$94,350	\$76,947	4906	9.56	469	1716	1815
26	139	0215.02	Middle	No	92.36	\$97,600	\$90,143	\$73,516	3889	15.12	588	855	1024
26	139	0216.03	Middle	No	91.87	\$97,600	\$89,665	\$73,125	4603	10.36	477	1600	1584
26	139	0216.04	Middle	No	116.79	\$97,600	\$113,987	\$92,963	7033	10.19	717	2562	2685
26	139	0216.05	Upper	No	136.77	\$97,600	\$133,488	\$108,864	3965	10.26	407	1226	1260
26	139	0216.06	Middle	No	108.40	\$97,600	\$105,798	\$86,281	4969	10.51	522	1389	1590
26	139	0217.00	Upper	No	128.20	\$97,600	\$125,123	\$102,042	5275	10.92	576	1361	1443
26	139	0218.01	Middle	No	93.28	\$97,600	\$91,041	\$74,250	4837	12.82	620	1167	1290

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 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	114.00	\$97,600	\$111,264	\$90,740	4686	9.03	423	1518	1605
26	139	0219.01	Upper	No	123.14	\$97,600	\$120,185	\$98,015	5129	8.83	453	1525	1639
26	139	0219.03	Upper	No	123.81	\$97,600	\$120,839	\$98,553	5175	23.92	1238	1476	1560
26	139	0219.04	Upper	No	158.09	\$97,600	\$154,296	\$125,833	3206	5.96	191	1011	1084
26	139	0220.01	Middle	No	84.47	\$97,600	\$82,443	\$67,239	6106	22.01	1344	1751	2077
26	139	0220.02	Middle	No	105.69	\$97,600	\$103,153	\$84,125	4107	11.98	492	1376	1776
26	139	0221.03	Upper	No	133.85	\$97,600	\$130,638	\$106,544	1497	10.75	161	509	736
26	139	0221.05	Middle	No	107.78	\$97,600	\$105,193	\$85,788	5994	31.33	1878	1758	1957
26	139	0221.06	Upper	No	155.30	\$97,600	\$151,573	\$123,611	3873	12.42	481	1238	1342
26	139	0221.07	Middle	No	105.02	\$97,600	\$102,500	\$83,594	1231	16.33	201	551	812
26	139	0221.08	Upper	No	166.11	\$97,600	\$162,123	\$132,216	6030	11.44	690	2388	2992
26	139	0222.06	Upper	No	127.03	\$97,600	\$123,981	\$101,111	4792	24.62	1180	1667	1773
26	139	0222.07	Middle	No	84.98	\$97,600	\$82,940	\$67,642	4035	51.08	2061	871	1078
26	139	0222.08	Middle	No	82.48	\$97,600	\$80,500	\$65,657	4934	65.44	3229	1213	1666
26	139	0226.00	Middle	No	118.35	\$97,600	\$115,510	\$94,205	2222	15.98	355	823	983
26	139	0229.00	Middle	No	93.68	\$97,600	\$91,432	\$74,571	6336	16.13	1022	1838	2524
26	139	0230.01	Upper	No	122.85	\$97,600	\$119,902	\$97,783	7654	10.77	824	1886	1974
26	139	0230.03	Upper	No	148.51	\$97,600	\$144,946	\$118,210	4242	20.32	862	1282	1419
26	139	0230.04	Middle	No	110.47	\$97,600	\$107,819	\$87,932	4163	9.51	396	1019	1181
26	139	0231.01	Middle	No	117.03	\$97,600	\$114,221	\$93,155	5538	45.34	2511	1385	1466
26	139	0231.02	Middle	No	84.58	\$97,600	\$82,550	\$67,321	6330	51.23	3243	1045	1542
26	139	0232.00	Middle	No	118.68	\$97,600	\$115,832	\$94,470	2565	7.45	191	841	903
26	139	0235.00	Upper	No	145.59	\$97,600	\$142,096	\$115,881	5264	9.25	487	1433	1506
26	139	0236.00	Upper	No	148.95	\$97,600	\$145,375	\$118,558	2492	7.58	189	743	778
26	139	0243.00	Upper	No	127.00	\$97,600	\$123,952	\$101,092	5327	10.78	574	1626	1872
26	139	0244.01	Middle	No	107.13	\$97,600	\$104,559	\$85,273	6043	15.72	950	970	1593
26	139	0244.02	Middle	No	117.00	\$97,600	\$114,192	\$93,125	4499	13.31	599	1542	1849
26	139	0245.01	Low	No	34.00	\$97,600	\$33,184	\$27,069	5477	20.18	1105	130	794
26	139	0245.02	Low	No	20.11	\$97,600	\$19,627	\$16,007	7267	20.23	1470	3	150

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State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 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	153.65	\$97,600	\$149,962	\$122,303	7288	12.18	888	1524	1666
26	139	0249.01	Middle	No	95.05	\$97,600	\$92,769	\$75,658	3687	41.09	1515	712	1160
26	139	0249.02	Middle	No	113.26	\$97,600	\$110,542	\$90,156	2986	15.30	457	187	220
26	139	0251.01	Moderate	No	56.66	\$97,600	\$55,300	\$45,101	3642	49.29	1795	1058	1375
26	139	0251.02	Middle	No	80.61	\$97,600	\$78,675	\$64,167	3654	32.90	1202	1099	1350
26	139	0252.00	Middle	No	102.90	\$97,600	\$100,430	\$81,910	5727	38.01	2177	1102	1977
26	139	0255.00	Middle	No	114.79	\$97,600	\$112,035	\$91,367	4366	17.06	745	1481	1471
26	139	0257.00	Moderate	No	78.04	\$97,600	\$76,167	\$62,121	5971	28.45	1699	1581	1988
26	139	0258.00	Middle	No	113.04	\$97,600	\$110,327	\$89,978	6055	50.69	3069	1498	2039
26	139	9900.00	Unknown	No	0.00	\$97,600	\$0	\$0	0	0.00	0	0	0

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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 12/31/2024	3rd Qtr 9/30/2024	2nd Qtr 6/30/2024	1st Qtr 3/31/2024
Loan-to-Deposit Ratio	77.70%	79.02%	80.57%	78.75%

2025 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	Y	Y	Y	N	Y (cash dispenser only)
Okemos 2112 Jolly Rd. Okemos, MI 48864	Y	Y	Y	Y	Y (cash dispenser only)
Grand Rapids O-240 Lake Michigan Drive NW Grand Rapids, MI 49534	Y	Y	Y	N	Y (cash dispenser only)
Alma LPO 301 N. State Street Alma, MI 48801	Y	N	N	Y	Y (cash dispenser only)

2025 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)	
Coin Counting	
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, Okemos and Grand Rapids branches. Debit cards may also be used at merchants that accept VISA® with PIN number for debit or signature as credit.

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.

Mobile Banking

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.

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.

Bank Website

<p>This service is available to consumer and business customers. Transfer funds between Commercial Bank accounts, Bill Pay and Mobile Check deposit.</p>	<p>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.</p>
<p>Online Account Opening</p> <p>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.</p>	

2025 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
Commercial Bank
101 N Pine River St.
Ithaca, MI 48847



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 electronic 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 2023 and 2024 and as of 03/28/2025.