



PUBLIC DISCLOSURE

September 19, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

County National Bank

Charter Number 14062

One South Howell Street
Hillsdale, MI 49242

Office of the Comptroller of the Currency
Northern Ohio Office
200 Public Square Suite 1610
Cleveland, OH 44114-2301

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of home mortgage loans and small loans to businesses among borrowers of different incomes, reasonable geographic distribution of home mortgages and small loans to businesses, a substantial majority of loans in the bank's (Assessment Areas) AAs, and a reasonable loan-to-deposit (LTD) ratio.
- The Community Development (CD) Test rating is based on an adequate responsiveness to community needs through qualified CD loans, investments, and services and its capacity to participate.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

We evaluated County National Bank's (CNB) quarterly LTD ratio for the periods between December 31, 2018, and December 31, 2021. The bank's average LTD ratio during this period was 89.9 percent, with quarterly ratios ranging from 75.7 percent to 98.05 percent. We also compared CNB's LTD ratio to three peer bank and a savings bank with assets between \$82 million and \$117 million located in Lenawee, Jackson, and Calhoun Counties with CNB. CNB's performance was similar to the peer banks, as their LTD ratios averaged between 52.7 percent to 89.1 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 89.4 percent of its total loans inside the bank's AAs during the evaluation period. In addition, 86.1 percent of the dollar amount was inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	464	89.7	53	10.3	517	69,754	86.3	11,095	13.7	80,849
2020	778	89.3	93	10.7	871	128,681	87.5	18,327	12.5	147,008
2021	575	89.4	68	10.6	643	91,742	85.4	15,665	14.6	107,407
Subtotal	1,817	89.5	214	10.5	2,031	290,177	86.6	45,086	13.4	335,263
Small Loans to Businesses										
2019	32	91.4	3	8.6	35	5,209	84.3	968	15.7	6,177
2020	29	82.9	6	17.1	35	3,812	63.1	2,226	36.9	6038
2021	32	91.4	3	8.6	35	5,471	85.9	898	14.1	6,369
Subtotal	93	88.6	12	11.4	105	14,492	78.0	4,092	22.0	18,584
Total	1910	89.4	226	10.6	2,136	304,669	86.1	49,178	13.9	353,847
<i>Source: Bank data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

CNB is a full-service intrastate community bank headquartered in Hillsdale, Michigan. The bank is a wholly owned subsidiary of CNB Community Bancorp Inc., a one-bank holding company, which is also headquartered in Hillsdale, Michigan. As of December 31, 2021, the bank had \$1.15 billion in total assets, and tier one capital totaled \$83.9 million or 7.3 percent of total assets. The bank has three AAs all of which are in Michigan. Its primary AA is the Hillsdale-Lenawee AA, which consists of Hillsdale and Lenawee counties and is located in a Non-Metropolitan Statistical Area (MSA). The Jackson AA consists of Jackson County and includes the entire Jackson MSA. The Calhoun AA contains two contiguous census tracts (CTs) located in Calhoun County which is part of the Battle Creek MSA.

CNB's primary loan products are residential real estate loans and small loans to businesses. From December 31, 2018, to December 31, 2021, the bank's loan portfolio increased by 40 percent to \$804.1 million. As of December 31, 2021, the loan portfolio was comprised of residential real estate loans (\$254.5 million or 31.7 percent), nonfarm nonresidential properties (\$262.3 million or 32.7 percent), commercial and industrial (\$206.1 million or 25.7 percent), consumer loans (\$36.6 million or 4.5 percent), construction (\$18.3 million or 2.3 percent) and farm (\$25 million or 3.1 percent).

Based on Federal Deposit Insurance Corporation (FDIC) Deposit Market Share reports from June 30, 2018, and June 30, 2021, deposits at the bank have increased from \$570 million to \$947 million. As of the June 30, 2021, \$494 million (52.1 percent) of the total deposits were from the Hillsdale and Lenawee AA, \$406 million (42.8 percent) were from the Jackson AA, \$48 million (5.1 percent) were from the Calhoun AA.

CNB offers traditional home loan products, including home mortgage loans, personal loans, consumer loans, and home equity lines of credit (HELOC). They also offer business loans including commercial real estate, business equipment, operating lines of credit, commercial vehicle, floor plans, agricultural

including Farm Service Agency (FSA) guaranteed, small business association (SBA), and United States Department of Agriculture (USDA). The bank's consumer deposit-related products and services include checking, savings, money market, certificates of deposit, and individual retirement accounts (IRA). Digital banking includes online bill payment, mobile banking, account transfers, check deposit, and ATM services. Business-related deposit products and services include checking and savings accounts, certificates of deposit and ATM and debit cards. Business online services include account transfers, wire transfers, ACH payroll, and bill pay. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the AAs. The bank received a "Satisfactory" rating on their previous Community Reinvestment Act (CRA) performance evaluation dated August 5, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation covers the period from January 1, 2019, to December 31, 2021. We performed a full-scope review using Intermediate Small Bank CRA examination procedures. This performance evaluation assesses CNB's record of meeting the credit needs of its AAs. The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities and uses home mortgage loans reported by the bank under the Home Mortgage Disclosure Act (HMDA). In addition, we selected a sample of small loans to businesses for evaluation.

Based on the bank's internal reports for lending activity during the evaluation period and discussions with management, we determined that the bank's primary lending focus during the evaluation period was home mortgage and small loans to businesses. While the bank offers farm, multi-family, home equity, and consumer installment loans, these products are not a primary focus for the bank, and as a result are not considered in this evaluation. Therefore, we did not evaluate the bank based on these loan products, as an analysis of this data would not be meaningful.

We also utilized other supporting information while evaluating CNB's CRA performance. Additional supporting information included 2015 American Community Survey (ACS) data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AAs. We also considered information from community contacts to help assess the needs of the bank's AAs.

Selection of Areas for Full-Scope Review

All of the bank's AAs are in the state of Michigan. We selected CNB's Hillsdale and Lenawee AA, Jackson AA, and Calhoun AA for full-scope reviews. These AAs contain all of the bank's branches and provide all of its deposit base and loan business. Refer to the Scope of Evaluation in Michigan section for details regarding how full-scope AAs were selected. Refer to Appendix A: Scope of Examination for a list of full- and limited-scope AAs.

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each regarding how full-scope

AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

CNB's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The bank's overall rating is based on performance within the bank's AAs. We weighed information from the following performance criteria when analyzing the bank's primary lending product: loan-to-deposit ratio, lending within the AA, lending to borrowers of different incomes and the geographic distribution of loans. The most weight was given to the Hillsdale-Lenawee and Jackson AAs because this is the bank's primary market for deposits and lending.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Michigan

CRA rating for the State of Michigan¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's distribution of home mortgage loans and small loans to businesses to borrowers of different income levels is reasonable.
- The bank's geographic distribution of home mortgage loans and small loans to businesses is reasonable.
- The bank's loan-to-deposit ratio is reasonable.
- The bank made a substantial majority of loans inside its AAs.
- The bank originated an adequate level of CD loans, investments, and services.

Description of Institution's Operations in Michigan

CNB's operations in Michigan consists of three AAs, which include the Hillsdale and Lenawee AA, Jackson AA, and Calhoun AA.

CNB has thirteen full-services branches and one drive-up facility. There are a total of eight branches (with the main office) in the Hillsdale and Lenawee AA, five offices in Jackson AA, and one office in the Calhoun AA. The bank opened one branch during the evaluation period. The branch, Tecumseh, was opened in the Lenawee County AA in July 2021. Each branch, with the exception of the Homer and Lewis Street drive-up, has an onsite deposit-taking ATM. Every branch also offers drive-through services. The bank also has additional deposit taking ATMs in Brooklyn, Hillsdale, Homer, and Pittsford, Michigan.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Hillsdale-Lenawee AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: County Hillsdale-Lenawee AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	14.3	68.6	17.1	0.0
Population by Geography	145,080	0.0	13.8	64.6	21.6	0.0
Housing Units by Geography	65,079	0.0	13.3	67.5	19.3	0.0
Owner-Occupied Units by Geography	42,939	0.0	8.6	68.6	22.8	0.0
Occupied Rental Units by Geography	12,835	0.0	31.2	54.4	14.4	0.0
Vacant Units by Geography	9,305	0.0	10.1	80.0	10.0	0.0
Businesses by Geography	8,038	0.0	17.1	62.2	20.7	0.0
Farms by Geography	877	0.0	2.2	74.7	23.1	0.0
Family Distribution by Income Level	37,217	17.8	17.9	21.3	43.0	0.0
Household Distribution by Income Level	55,774	20.9	16.3	18.6	44.2	0.0
Median Family Income Non- MSAs - MI		\$53,628	Median Housing Value			\$109,719
			Median Gross Rent			\$711
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS and 2021 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.</i>						

The Hillsdale-Lenawee County AA, based on 2015 ACS data, is comprised of no low-income census tracts (CTs) and five moderate-income CTs. There are no low-income CTs, and only one moderate-income CT, in Hillsdale County. There are also no low-income CTs in Lenawee County and four moderate-income CTs. The AA has 24 middle-income and six upper-income CTs. CNB's headquarters is located in Hillsdale, Michigan. Eight of the bank's 14 branches are located in the Hillsdale-Lenawee AA.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are 12 financial institutions with 28 offices serving the Hillsdale-Lenawee AA. CNB is ranked first in terms of deposit market share in the AA, with 23.33 percent of total deposits. The next five institutions have a market share of 59.52 percent. These institutions include Premier Bank, Old National Bank, KeyBank National Association, The Huntington National Bank, and Southern Michigan Bank and Trust. Based on the June 30, 2021, FDIC Deposit Market Share Report, 52.1 percent of the bank's total deposits are from this AA.

Based on 2021 peer aggregate home mortgage lending data, CNB was ranked 6 of 264 with a 4.5 percent market share in the AA. The top five lenders have a market share of 33.9 percent. The five

largest lenders include Rocket Mortgage, TLC Community Credit Union, Huntington National Bank, Premier Bank, and Old National Bank.

The AA population increased slightly from 145,080 persons according to 2015 ACS data, to 145,169 persons according to the 2020 U.S. Census data. The largest cities in the AA are Hillsdale, Osseo, and Jonesville which are in Hillsdale County. The largest cities in Lenawee County are Adrian, Madison Charter Township, and Tecumseh. The economy is driven largely by manufacturing, retail, health care and social assistance. Major employers include Hillsdale College, Siena Heights University, Kirchoff Automotive, and Hillsdale Hospital. The unemployment rates in Hillsdale and Lenawee Counties were 4.2 and 3.9 percent, respectively, as of December 31, 2021. These rates were at or near the state unemployment rate of 4.2 percent.

As part of the evaluation process, we conducted one community contact covering the Hillsdale-Lenawee County AA. The community organization covers Hillsdale, Lenawee, and Jackson Counties. The community organization focuses on providing affordable housing and social services to low- and moderate-income individuals and families. The organization noted basic needs in the AA include affordable housing, additional rental units, mental health services, utility assistance, and transportation options. The organization needs include general operating support, financial assistance for housing counseling, utility assistance, grants for accessibility modifications for seniors, individuals for Volunteers Income Tax Assistance (VITA) sites, pre-construction financing, and lines of credit for construction.

Jackson AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Jackson AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	38	15.8	23.7	36.8	21.1	2.6
Population by Geography	159,759	9.9	19.4	47.4	20.1	3.2
Housing Units by Geography	69,121	9.8	20.7	47.0	22.5	0.0
Owner-Occupied Units by Geography	43,555	5.7	15.6	53.7	25.0	0.0
Occupied Rental Units by Geography	17,036	18.9	32.2	34.9	14.0	0.0
Vacant Units by Geography	8,530	12.7	23.9	36.7	26.7	0.0
Businesses by Geography	8,946	8.9	27.3	42.4	21.3	0.1
Farms by Geography	451	1.6	8.9	66.1	23.5	0.0
Family Distribution by Income Level	39,930	22.3	17.5	20.2	40.0	0.0
Household Distribution by Income Level	60,591	24.6	16.0	17.0	42.4	0.0
Median Family Income MSA - 27100 Jackson, MI MSA		\$58,432	Median Housing Value			\$112,449
			Median Gross Rent			\$722
			Families Below Poverty Level			12.9%
<i>Source: 2015 ACS and 2021 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.</i>						

The Jackson County AA, based on 2015 ACS data, is comprised of six low-income census tracts (CTs), nine moderate-income CTs, 14 middle-income and eight upper-income CTs. There was one CT where the income level is unknown in Jackson County. Five of the bank's 14 branches are located in the Jackson AA.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are 12 financial institutions with 33 offices serving the Jackson AA. CNB is ranked third in terms of deposit market share in the AA, with 14.45 percent of total deposits. The other top five ranking institutions have a market share of 75.47 percent. The other institutions include Flagstar Bank, FSB, Comerica Bank, The Huntington National Bank, and Fifth Third Bank, National Association. Based on the June 30, 2021, FDIC Deposit Market Share Report, 42.9 percent of the bank's total deposits are from this AA.

Based on 2021 peer aggregate home mortgage lending data, CNB was ranked 4 of 296 with a 4.4 percent market share in the AA. The other top five lenders have a market share of 25.7 percent. These lenders include Rocket Mortgage, Flagstar Bank, Huntington National Bank, and Mortgage 1 Incorporated.

The AA population increased slightly from 159,759 persons according to 2015 ACS data, to 160,366 persons according to the 2020 U.S. Census data. The largest cities in the AA are Jackson, Blackman Township, and Summit Township. The economy is driven largely by manufacturing, retail, health care and social services. Major employers include Henry Ford Allegiance Health, Consumer Energy, and Michigan Department of Corrections. The unemployment rate in Jackson County was 4.2 percent as of December 31, 2021. The rate was the same as the state unemployment rate.

As part of the evaluation process, we conducted one community contact covering the Jackson County AA. The community organization covers Hillsdale, Lenawee and Jackson Counties. The community organization focuses on providing affordable housing and social services to low- and moderate-income individuals and families. The organization noted basic needs in the AA include affordable housing, additional rental units, mental health services, utility assistance, and transportation options. The organization needs include general operating support, financial assistance for housing counseling, utility assistance, grants for accessibility modifications for seniors, individuals for Volunteers Income Tax Assistance (VITA) sites, pre-construction financing, and lines of credit for construction.

Calhoun AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Calhoun AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	10.3	30.8	38.5	20.5	0.0
Population by Geography	134,790	7.4	26.5	39.2	26.9	0.0
Housing Units by Geography	60,716	7.6	27.7	38.7	26.1	0.0
Owner-Occupied Units by Geography	36,640	5.2	21.1	42.7	31.0	0.0
Occupied Rental Units by Geography	16,210	10.4	37.3	32.9	19.4	0.0
Vacant Units by Geography	7,866	12.9	38.6	31.9	16.6	0.0
Businesses by Geography	7,239	8.3	26.1	33.4	32.3	0.0
Farms by Geography	396	2.0	8.3	63.4	26.3	0.0
Family Distribution by Income Level	33,625	21.7	17.8	19.6	40.9	0.0
Household Distribution by Income Level	52,850	22.7	17.4	17.5	42.4	0.0
Median Family Income MSA - 12980 Battle Creek, MI MSA		\$53,315	Median Housing Value			\$98,713
			Median Gross Rent			\$686
			Families Below Poverty Level			13.4%
<i>Source: 2015 ACS and 2021 D&B data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Calhoun AA, based on 2015 ACS data, is comprised of four low-income census tracts (CTs) and 12 moderate-income CTs, 15 middle-income and eight upper-income CTs. The bank's AA contains only two CTs both are middle-income CTs. The bank has one branch in the AA. This is not a significant market for the bank.

Banking competition within the AA is high. According to the June 30, 2021, FDIC Deposit Market Share Report, there are ten financial institutions with 24 offices serving the Calhoun AA. CNB is ranked 8 in terms of deposit market share in the AA, with 3.52 percent of total deposits. The top five institutions have a market share of 83.60 percent. These institutions include The Huntington National Bank, Fifth Third Bank, National Association, Comerica Bank, Southern Michigan Bank and Trust, and PNC Bank, National Association. Based on the June 30, 2021, FDIC Deposit Market Share Report, 5 percent of the bank's total deposits are from this AA.

Based on 2021 peer aggregate home mortgage lending data, CNB was ranked 58 of 255 with a 0.3 percent market share in the AA. The top five lenders have a market share of 34.1 percent. The five largest lenders include Rocket Mortgage, Kellogg Community Credit Union, Marshall Community Credit Union, Amerifirst Financial Corporation, and Fifth Third Bank, National Association.

The AA population decreased slightly from 134,790 persons according to 2015 ACS data, to 134,310 persons according to the 2020 U.S. Census data. The largest cities in the AA are Battle Creek, and Marshall City in Calhoun County. The economy is driven largely by manufacturing, retail, health care and social assistance. Major employers include Denso Manufacturing Michigan, Inc., Kellogg Company, and Firekeepers Casino. The unemployment rate in Calhoun AA was 4.8 percent as of December 31, 2021, and above the state unemployment rate of 4.2 percent.

Scope of Evaluation in Michigan

This analysis reflects a full-scope review of the bank's three AAs in Michigan. We completed our analysis of the Hillsdale-Lenawee, Jackson, Calhoun County AAs from January 1, 2019, to December 31, 2021 (evaluation period). To develop our conclusions, we considered the number of home mortgage loans originated or purchased by CNB and small loans to businesses during the evaluation period. We gave more weight to the Hillsdale-Lenawee and Jackson AAs since they contain the majority of the bank's deposits, loans, and branches. We gave more weight to the distribution of loans to individuals of different income levels and businesses of different sizes and the geographic distribution of home mortgages and small loans to business. We also considered any factors affecting the bank's ability to lend in each AA during the evaluation period. Refer to the Rating section above.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

CNB's performance under the Lending Test in Michigan is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope reviews, the bank's lending performance in the state of Michigan is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state of Michigan.

Home Mortgage Loans

Refer to Table O in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Hillsdale-Lenawee AA

CNB's distribution of home mortgage loans among CTs of different income levels in the Hillsdale-Lenawee AA, during evaluation period is reasonable. There are no low-income CTs in the Hillsdale-Lenawee AA. The bank's percentage of home mortgage loans in moderate-income CTs in the AA was 5.8 percent. This is near both the 8.6 percent of the AAs owner-occupied housing units in moderate-income CTs and the 7.7 percent of aggregate bank lending.

Jackson AA

The bank's distribution of home mortgage loans among CTs of different income levels in the Jackson AA, during the evaluation period is poor. The bank's percentage of home mortgage loans among low-income CTs was 1.6 percent. This was below the 5.7 percent of the AAs owner-occupied housing units in low-income CTs and but below the 3.2 percent aggregate bank lending level. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 9.4 percent. This is below both the 15.6 percent of the AAs owner-occupied housing units in moderate-income geographies and the 14.9 percent of aggregate bank lending.

Calhoun AA

The bank's distribution of home mortgage loans among CTs of different income levels in the Calhoun AA, during the evaluation period is reasonable. The bank's percentage of home mortgage loans among low-income CTs was 6.7 percent. This was above the 5.2 percent of the AAs owner-occupied housing units in low-income CTs and significantly above the 2.6 percent aggregate bank lending level. The bank's percentage of home mortgage loans among moderate-income CTs in the AA was 10.7 percent. This is significantly below both the 21.1 percent of the AAs owner-occupied housing units in moderate-income geographies and the 19.1 percent of aggregate bank lending.

Small Loans to Businesses

Refer to Table Q in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Hillsdale-Lenawee AA

CNB's distribution of small loans to businesses among CTs of different income levels in the Hillsdale-Lenawee AA during the evaluation period is reasonable. There are no low-income CTs in the AA. The bank's percentage of small loans to businesses among moderate-income CTs was 12.5 percent. This is near both the 17.1 percent of businesses in the moderate-income CTs and 14.7 percent aggregate bank lending level.

Jackson AA

The bank's distribution of small loans to businesses among CTs of different income levels in the Jackson AA during evaluation period is reasonable. The bank's percentage of small business loans to low-income borrowers was 7.0 percent. This is near both the 8.9 percent of businesses in the AA and 10.1 percent aggregate bank lending level. The bank's percentage of small loans to businesses among moderate-income CTs was 26.3 percent. This is near the 27.3 percent of businesses in moderate-income CTs and the 28.6 percent aggregate bank lending level

Calhoun AA

Our sample of small loans to business did not identify sufficient number of loans in the Calhoun AA. As a result, meaningful analysis could not be made.

Distribution of Loans by Income Level of the Borrower

CNB exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Hillsdale-Lenawee AA

CNB's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Hillsdale-Lenawee AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 6.2 percent. This is significantly below the 17.8 percent of low-income families living in the AA, but above the 6.0 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers was 20.2 percent. It is above the 17.9 percent of moderate-income families living in the AA, and the 18.5 percent aggregate bank lending level.

Jackson AA

The bank's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Jackson AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 6.4 percent. This is significantly below the 22.3 percent of low-income families living in the AA, but near the 6.7 percent aggregate bank lending level. The bank's percentage of home mortgage loans to moderate-income borrowers was 15.8 percent. It is near both the 17.5 percent of moderate-income families living in the AA, and the 19.2 percent aggregate bank lending level.

Calhoun AA

CNB's distribution of home mortgage loans to borrowers of different income levels during the evaluation period in the Calhoun AA is reasonable. The bank's percentage of home mortgage loans to low-income borrowers was 11.5 percent. This is significantly below the 21.7 percent of low-income families living in the AA, but above the 6.6 percent aggregate bank lending level. The bank's percentage

of home mortgage loans to moderate-income borrowers is 16.4 percent. It is near the 17.8 percent of moderate-income families living in the AA, but below the 20.7 percent aggregate bank lending level.

Small Loans to Businesses

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses reflects reasonable penetration among businesses of different sizes. We considered the bank's limited opportunities for lending to businesses in the AA given the level of competition from other banks, credit unions, and non-bank financial institutions.

Hillsdale-Lenawee AA

CNB's distribution of small loans to businesses among businesses of different sizes in the Hillsdale-Lenawee AA during the evaluation period is reasonable. Based on our statistical sample of small loans to businesses originated during the evaluation period, the bank made 87.5 percent of its loans to businesses with gross annual revenues of \$1 million or less. This is above to the 84.1 percent of small businesses in the AA and is significantly above the aggregate small loans to small businesses lending level of 33.3 percent.

Jackson AA

The bank's distribution of small loans to businesses among businesses of different sizes in the Jackson AA during the evaluation period is reasonable. Based on our statistical sample of small loans to businesses originated during the evaluation period, the bank made 64.9 percent of its loans to businesses with gross annual revenues of \$1 million or less. This is below the 82.4 percent of small businesses in the AA and is significantly above the aggregate small loans to small businesses lending level of 42.0 percent.

Calhoun AA

Our sample of small loans to business did not identify sufficient number of loans in the Calhoun AA. As a result, meaningful analysis could not be made.

Responses to Complaints

CNB did not receive any complaints during the evaluation period that would affect its CRA rating.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Michigan is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community

development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

CNB demonstrated adequate responsiveness to CD needs through community development loans. The bank originated 62 CD loans totaling more than \$32.9 million during the evaluation period, largely in community service and economic development. The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, CNB made a reasonable level of CD loans in the AAs. In the Hillsdale-Lenawee AA, the bank originated 34 qualifying CD loans totaling \$9.2 million. The loans were Small Business Administration (SBA) loans for community revitalization, economic development, affordable housing, and community services in the AA.

In the Jackson AA, the bank originated 28 qualifying CD loans totaling \$23.79 million. The loans were Small Business Administration (SBA) loans for community revitalization, economic development, affordable housing, and community services in the AA.

In the Calhoun AA, the bank did not originate any qualifying CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Hillsdale-Lenawee	34	54.8	\$9,210.00	27.9
Jackson	28	45.2	\$23,786.00	72.1
Calhoun	0	0	0	0
Totals	62	100.0	32,996	100.0

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank's level of CD investments.

During the evaluation period, CNB made a relatively satisfactory level of CD investments which had a neutral impact on its overall lending performance in the AAs. The bank made twelve qualified investments totaling approximately \$5.9 million. CNB also made \$104,000 in donations within the AAs.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hillsdale and Lenawee AA	0	0	29	\$445	29	44.6	\$455	7.6	0	0
Jackson AA	0	0	21	\$5,555	21	32.3	\$5,555	92.5	0	0
Calhoun AA	0	0	15	\$4	15	23.1	\$4	<.1	0	0
Total	0	0	65	\$6,004	65	100.0	\$6,004	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Extent to Which the Bank Provides Community Development Services

CNB's branches are reasonably accessible to CTs and individuals of different income levels. Overall, systems for delivering retail banking services are adequate. The bank operates two full-service branches and one drive through branch in a moderate-income CT. The bank opened one branch during the evaluation period. All branches except one have onsite deposit-taking ATMs. The bank also includes three offsite cash-taking ATMs in Hillsdale, Homer, and Pittsfield. All the bank's offer drive-thru services. Branch hours, and the level of services available, do not vary in ways that inconvenience any portion of the AA, including low- and moderate-income individuals. Other alternative delivery systems include online banking and bill pay, mobile banking, and remote check deposit.

Community Development Services

During the evaluation period, CNB provided a reasonable level of CD services which had a neutral impact on its overall lending performance in the AAs. Sixteen of CNB staff served on ten organization board positions and volunteered for financial training. The bank employees provided 361 service hours to these organizations. The organizations included affordable housing, community services, and economic development.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	No affiliate products reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Hillsdale-Lenawee AA	Full-scope	The Hillsdale-Lenawee AA consists Hillsdale and Lenawee Counties in their entirety. There are 35 census tracts in the AA, and the AA is not part of an MSA.
Jackson AA	Full-scope	The Jackson AA consists of Jackson County in its entirety, and all of the Jackson, MI MSA. The AA includes 38 census tracts.
Calhoun AA	Full-Scope	The Calhoun AA consists of two contiguous census tracts located in the southeastern portion of Calhoun County. The Calhoun AA is part of the Battle Creek, MI MSA.
State		
Michigan		

Appendix B: Summary of MMSA and State Ratings

RATINGS COUNTY NATIONAL BANK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
County National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Michigan	Satisfactory	Satisfactory	Satisfactory

State Rating for details (*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

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, which 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).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent 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 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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 qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): 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, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Calhoun AA	40	4,560,000.00	2.1	164	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Hillsdale Le nawee AA	901	131,505,000.00	47.1	6,455	0.0	0.0	0.0	8.6	6.8	7.7	68.6	88.6	62.5	22.8	4.7	29.8	0.0	0.0	0.0	
Jackson AA	970	175,480,000.00	50.8	7,462	5.7	2.0	3.2	15.6	10.2	14.9	53.7	53.3	53.1	25.0	34.5	28.7	0.0	0.0	0.0	
Total	1,911	311,545,000.00	100.0	14,081	2.8	1.0	1.7	11.9	8.4	11.4	61.7	70.9	58.0	23.5	19.7	28.9	0.0	0.0	0.0	

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Calhoun AA	40	4,560,000.00	2.1	164	18.5	12.5	6.1	18.9	12.5	18.9	23.1	35.0	24.4	39.5	37.5	34.8	0.0	2.5	15.9
Hillsdale Le nawee AA	901	131,505,000.00	47.1	6,455	17.8	6.5	6.0	17.9	19.9	18.5	21.3	24.4	23.1	43.0	45.6	37.2	0.0	3.6	15.3
Jackson AA	970	175,480,000.00	50.8	7,462	22.3	6.3	6.7	17.5	15.2	19.2	20.2	20.7	23.4	40.0	53.0	35.8	0.0	4.8	14.9
Total	1,911	311,545,000.00	100.0	14,081	20.1	6.5	6.4	17.7	17.3	18.9	20.8	22.8	23.2	41.4	49.2	36.4	0.0	4.2	15.1

Source: 2015 ACS; Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate %	% Businesses	% Bank Loans	Aggregate %	% Businesses	% Bank Loans	Aggregate %	% Businesses	% Bank Loans	Aggregate %	% Businesses	% Bank Loans	Aggregate %	
Calhoun AA	4	238	4.3	1,440	8.3	0.0	7.9	26.1	0.0	27.6	33.4	100.0	31.8	32.3	0.0	32.6	0.0	0.0	0.0	
Jackson AA MSA	57	9,799	61.3	1,876	8.9	7.0	10.1	27.3	26.3	28.6	42.4	35.1	38.9	21.3	31.6	22.5	0.1	0.0	0.0	
Hillsdale Lenawee AA	32	2,650	34.4	1,706	0.0	0.0	0.0	17.1	12.5	14.7	62.2	75.0	61.5	20.7	12.5	23.9	0.0	0.0	0.0	
Total	93	12,687	100.0	5,022	5.7	4.3	6.0	23.5	20.4	23.6	46.3	51.6	44.5	24.4	23.7	25.9	0.1	0.0	0.0	

*Source: 2021 D&B data; 01/01/2019 - 12/31/2021 bank data; 2020 CRA aggregate data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Calhoun AA	4	238	4.3	1,440	79.7	75.0	29.9	6.3	25.0	14.0	0.0	
Jackson AA	57	9,799	61.3	1,876	82.4	64.9	42.0	6.3	35.1	11.4	0.0	
Hillsdale Lenawee AA	32	2,650	34.4	1,706	84.1	87.5	33.3	4.8	12.4	11.1	0.0	
Total	93	12,687	100.0	5,022	82.2	73.1	35.6	5.8	26.9	12.0	0.0	
<i>Source: 2021 D&B data; 01/01/2019 - 12/31/2021 bank data; 2020 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												