



COMMUNITY REINVESTMENT ACT PUBLIC FILE

CITIZENS BANK OF LAFAYETTE

2025

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**We must make copies of this public file available to you when requested at no cost.*

1 - Community Reinvestment Act Comments

All written comments received from the public for the current year by quarter and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet community credit needs, and any response by the bank, , if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law.

To receive a copy of the comments or place a comment relating to our CRA performance, see the CRA disclosure statement later in this document.

Current Year

January through March 2025

None

April through June 2025

None

July through September 2025

None

October through December 2025

None

Previous Years

January through December 2023

None

January through December 2024

None

**Citizens Bank has not received any comments from the public regarding its performance in meeting the community needs for the current year or the preceding two calendar years.*

2 – Branch List

A list of the institution's branches, their street addresses; a list of branches opened and closed during the current year and each of the prior two calendar years.

Bank Name for Branch	Branch Name	Address	City	State	Zip code	Branch/ATM	Branch Hours	Branch Phone
American Bank and Trust	Livingston	808 West Main St	Livingston	TN	38570	Branch & ATM	(Drive-thru open at 7:30) Mon-Thur 8-4:30 Fri 8-5 Sat(Lobby) Closed Sat(Drive-thru) 7:30-12	(931) 823-2265
American Bank and Trust	Cookeville Neal Street	1450 Neal St	Cookeville	TN	38501	Branch & ATM	(Drive-thru closes at 5) Mon-Thur 8-4:30 Fri 8-5 Sat(Lobby) Closed Sat(Drive-thru) 8-12	(931) 526-4800
American Bank and Trust	Cookeville Willow Avenue	123 N Willow Ave	Cookeville	TN	38501	Branch & ATM	(Drive-thru closes at 5) Mon-Thur 8-4:30 Fri 8-5 Sat(Lobby) Closed Sat(Drive-thru) Closed	(931) 646-4950
Bank of Celina	Celina	101 East Lake Ave	Celina	TN	38551	Branch & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(931) 243-3161
Citizens Bank	Lafayette Main Office	400 Hwy 52 Bypass West	Lafayette	TN	37083	Main Office & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 666-2195
Citizens Bank	Lafayette Scottsville Branch	1108 Scottsville Rd	Lafayette	TN	37083	Branch & ATM	Mon-Wed 8-4 Thur Closed Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 666-4677

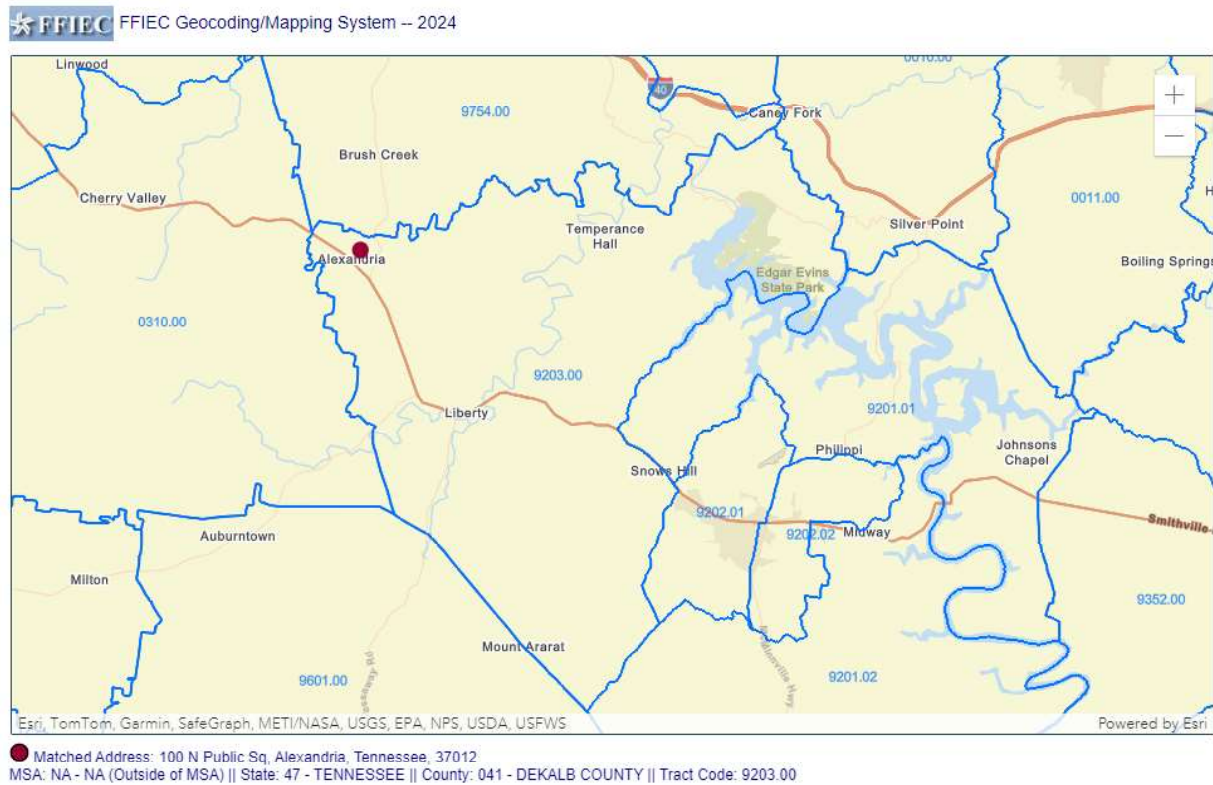
Citizens Bank	Red Boiling Springs	32 Carthage Rd	Red Boiling Springs	TN	37150	Branch & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 699-2205
Citizens Bank	Westmoreland	990 TN-52	Westmoreland	TN	37186	Branch & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 644-2119
Citizens Bank	Gainesboro	116 S Grundy Quarles Hwy	Gainesboro	TN	38562	Branch & ATM	Mon-Tue 8:30-5 Wed 8:30-12 Thur-Fri 8:30-5 Sat(Lobby) 8:30-12 Sat(Drive-thru) 8:30-12	(931) 268-2141
Citizens Bank	Lafayette Public Square	201 West Locust St	Lafayette	TN	37083	Branch	Mon-Tue 8-4 Wed Closed Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 666-2196
Liberty State Bank	Alexandria	100 North Public Square	Alexandria	TN	37012	Branch & ATM	Mon-Tue 8-4 Wed 8-12 Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 529-2375
Liberty State Bank	Smithville	735 S Congress Blvd	Smithville	TN	37166	Branch & ATM	Mon-Tue 8-4 Wed 8-12 Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 597-2265
Liberty State Bank	Lebanon- West Main	1035 West Main St	Lebanon	TN	37087	Branch & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 444-4166

Liberty State Bank	Lebanon-North Cumberland	214 North Cumberland St	Lebanon	TN	37087	Branch & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) Closed Sat(Drive-thru) Closed	(615) 449-4441
Smith County Bank	Carthage	50 N Main St	Carthage	TN	37030	Branch & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 735-2800
Smith County Bank	Gordonsville	411 Gordonsville Hwy	Gordonsville	TN	38563	Branch & ATM	Mon-Thur 8-4 Fri 8-5 Sat(Lobby) 8-12 Sat(Drive-thru) 8-12	(615) 683-1919
Traders Bank	Tullahoma	120 N Jackson St	Tullahoma	TN	37388	Branch & ATM	(Drive-thru opens at 8) Mon-Thur 8:30-4 Fri 8:30-5 Sat(Lobby) Closed Sat(Drive-thru) Closed	(931) 455-3426
Traders Bank	Winchester	2695 Decherd Blvd	Winchester	TN	37398	Branch & ATM	(Drive-thru opens at 8) Mon-Thur 8:30-4 Fri 8:30-5 Sat(Lobby) Closed Sat(Drive-thru) Closed	(931) 967-3755
Traders Bank	Manchester	1207 Hillsboro Rd	Manchester	TN	37355	Branch & ATM	(Drive-thru opens at 8) Mon-Thur 8:30-4 Fri 8:30-5 Sat(Lobby) Closed Sat(Drive-thru) Closed	(931) 728-1474
Traders Bank	Shelbyville	1602 N Main St	Shelbyville	TN	37160	Branch & ATM	(Drive-thru opens at 8) Mon-Thur 8:30-4 Fri 8:30-5 Sat(Lobby) Closed Sat(Drive-thru) Closed	(931) 680-3500
ATM	ATM	55 Dixon Springs Hwy	Carthage	TN	37030	ATM	24/7	
ATM	ATM (Twin Creeks Marina)	STE 10091 Slip-a-way	Winchester	TN	37398	ATM	24/7	

3 - Branch Locations and Census Tracts

A map of each Branch Location showing its boundaries and, on the map or in a separate list, the census tracts contained within the Branch Location.

Branch Location I – Alexandria Branch (Alexandria Branch) 100 N Public Square Alexandria, TN 37012

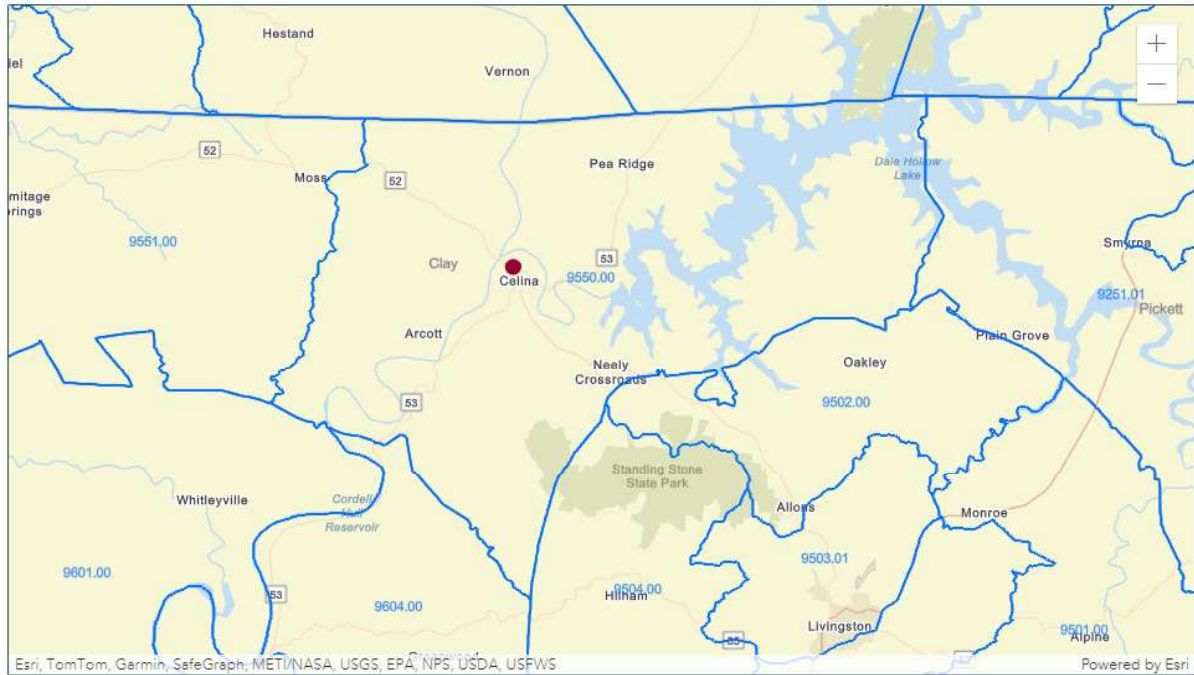


Branch Location II – Carthage (Carthage Branch)
50 North main Street Carthage, TN 37030



Branch Location III – Celina (Celina Branch)
101 East Lake Avenue Celina, TN 38551

FFIEC FFIEC Geocoding/Mapping System -- 2024



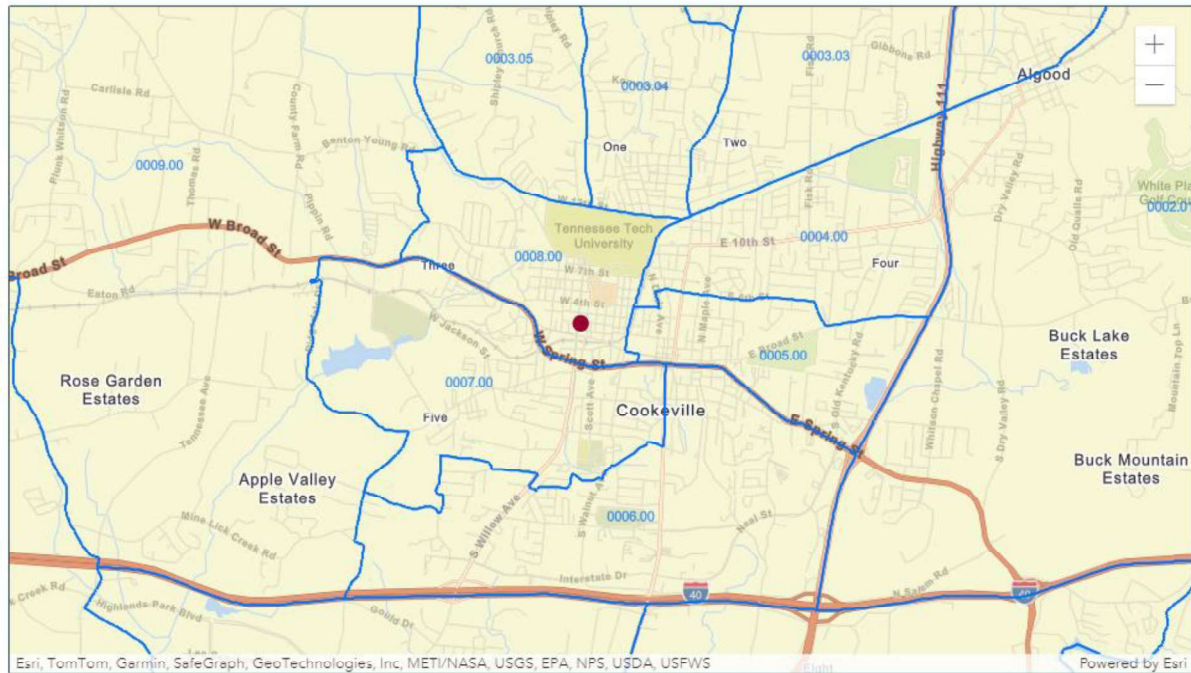
● Matched Address: 101 E Lake Ave, Celina, Tennessee, 38551
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 027 - CLAY COUNTY || Tract Code: 9550.00

Branch Location IV – Cookeville (Neal Street Branch)
1450 Neal Street Cookeville, TN 38501



Branch Location V – Cookeville (Willow Avenue Branch)
123 North Willow Avenue Cookeville, TN 38506

FFIEC FFIEC Geocoding/Mapping System – 2024



● Matched Address: 123 N Willow Ave, Cookeville, Tennessee, 38501
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 141 - PUTNAM COUNTY || Tract Code: 0008.00

Branch Location VI – Gainesboro (Gainesboro Branch)
116 S Grundy Quarles Hwy, Gainesboro, TN, 38562



Branch Location VII – Gordonsville (Gordonsville Branch)
411 Gordonsville Hwy, Gordonsville, TN, 38563

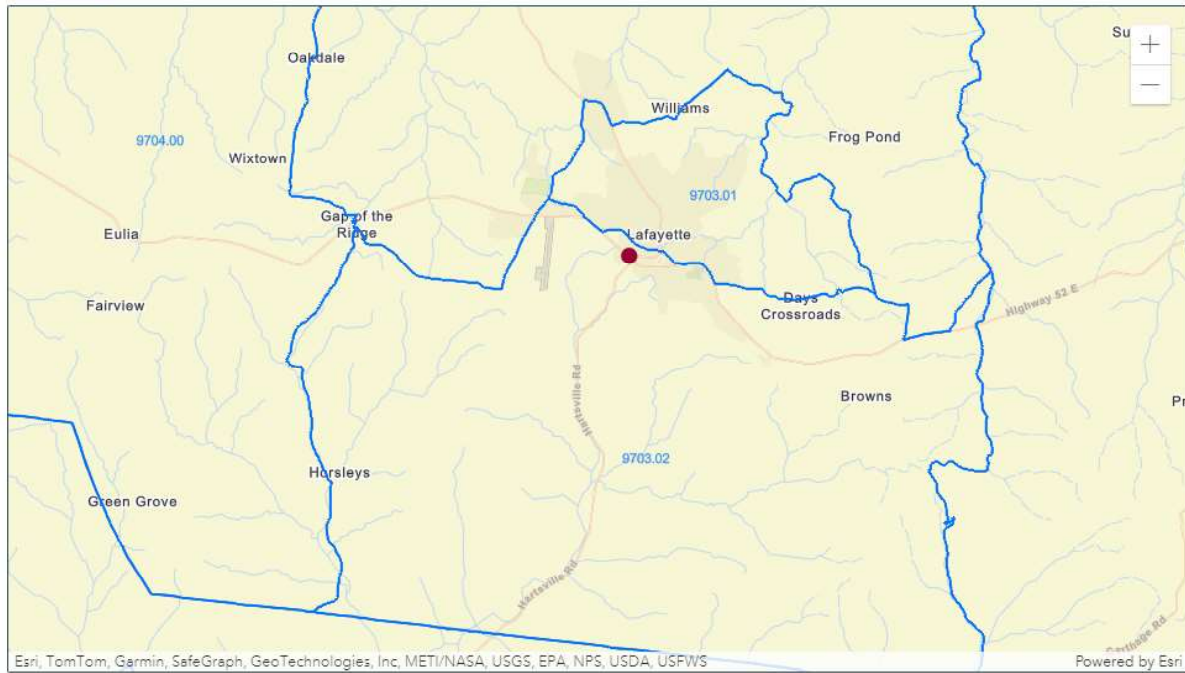
FFIEC FFIEC Geocoding/Mapping System -- 2024



● Matched Address: 411 Gordonsville Hwy, Gordonsville, Tennessee, 38563
MSA: 34980 - NASHVILLE-DAVISON--MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 159 - SMITH COUNTY || Tract Code: 9754.00

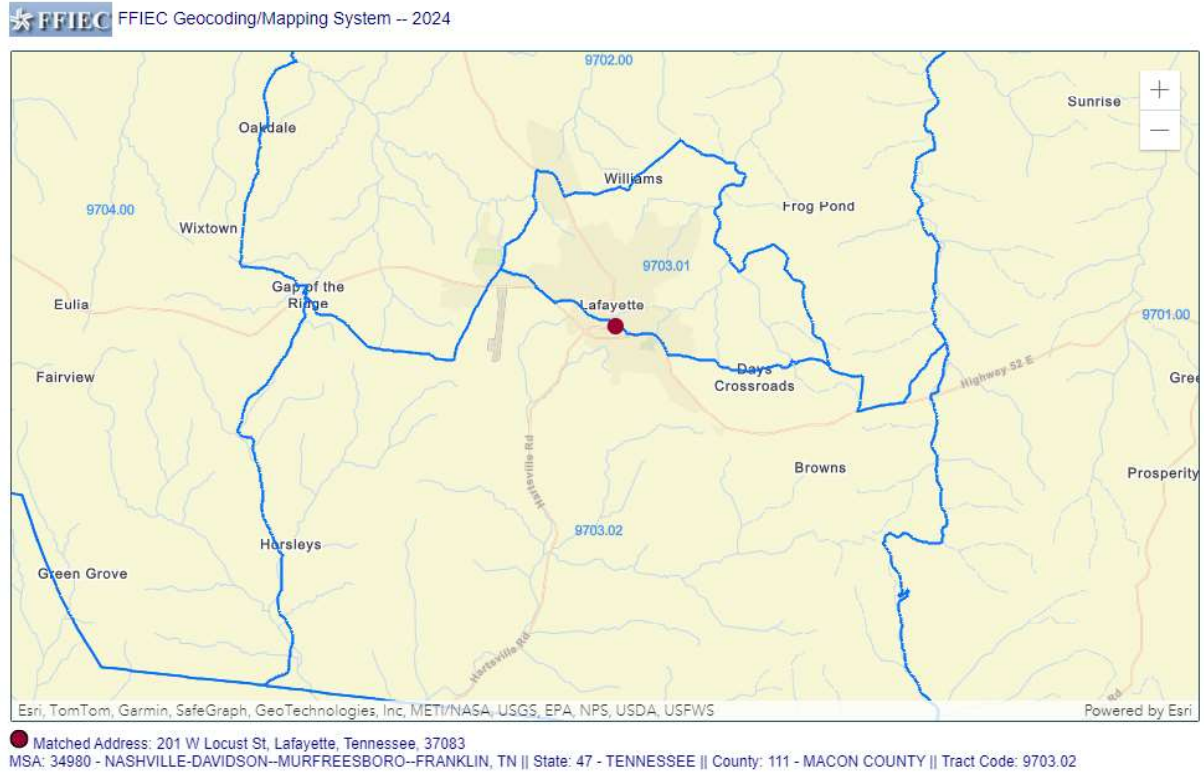
Branch Location VIII – Lafayette (Lafayette Main Branch)
400 Highway 52 Bypass W, Lafayette, TN, 37083

FFIEC FFIEC Geocoding/Mapping System -- 2024



● Matched Address: 400 Highway 52 Byp W, Lafayette, Tennessee, 37083
MSA: 34980 - NASHVILLE-DAVIDSON--MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 111 - MACON COUNTY || Tract Code: 9703.02

Branch Location IX – Lafayette (Lafayette Public Square Branch)
201 W Locust St, Lafayette, TN, 37083



Branch Location X – Lafayette (Lafayette Scottsville Road Branch)
1108 Scottsville Rd, Lafayette, TN, 37083

 FFIEC Geocoding/Mapping System – 2024



● Matched Address: 1108 Scottsville Rd, Lafayette, Tennessee, 37083

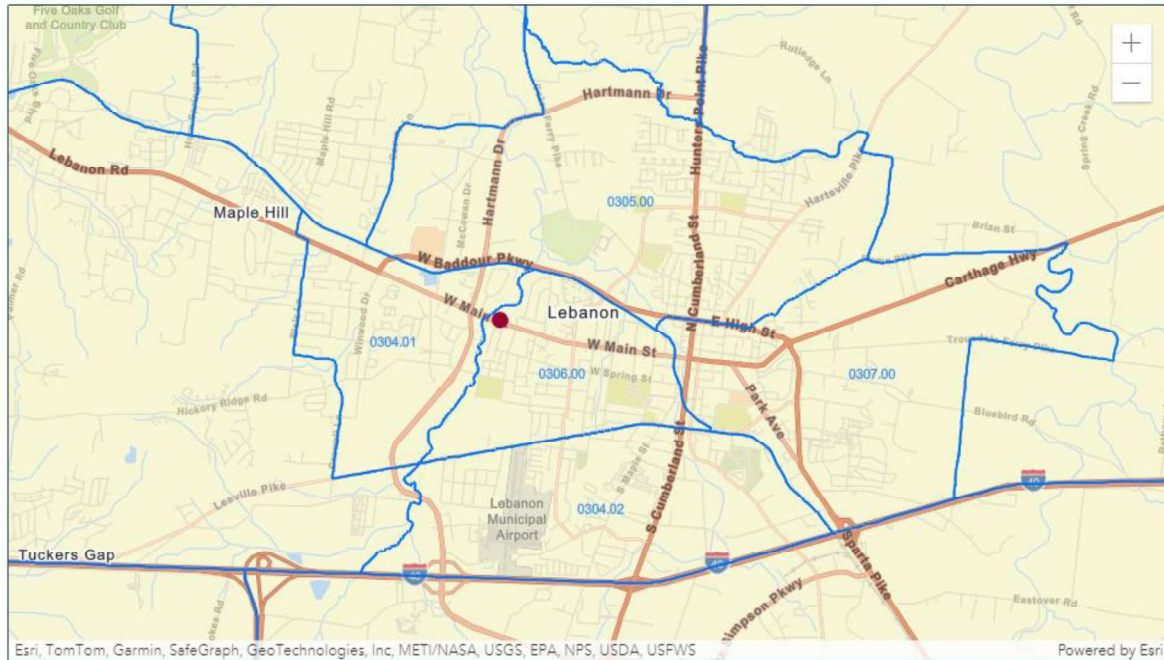
MSA: 34980 - NASHVILLE-DAVIDSON-MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 111 - MACON COUNTY || Tract Code: 9703.01

Branch Location XI – Lebanon (Lebanon North Cumberland Branch)
214 N Cumberland St, Lebanon, TN, 37087



Branch Location XII – Lebanon (Lebanon West Main Branch)
1035 W Main St, Lebanon, TN, 37087

FFIEC Geocoding/Mapping System – 2024



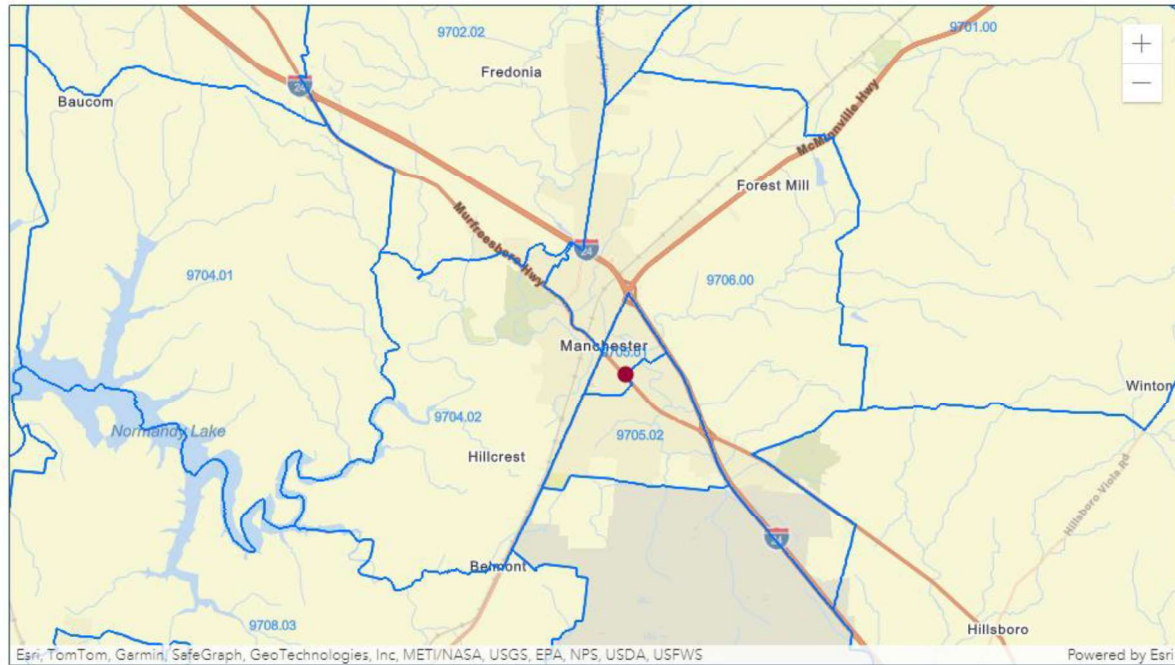
● Matched Address: 1035 W Main St, Lebanon, Tennessee, 37087
MSA: 34980 - NASHVILLE-DAVIDSON-MURFREESBORO-FRANKLIN, TN || State: 47 - TENNESSEE || County: 189 - WILSON COUNTY || Tract Code: 0306.00

Branch Location XIII – Livingston (Livingston Branch)
808 W Main St, Livingston, TN, 38570



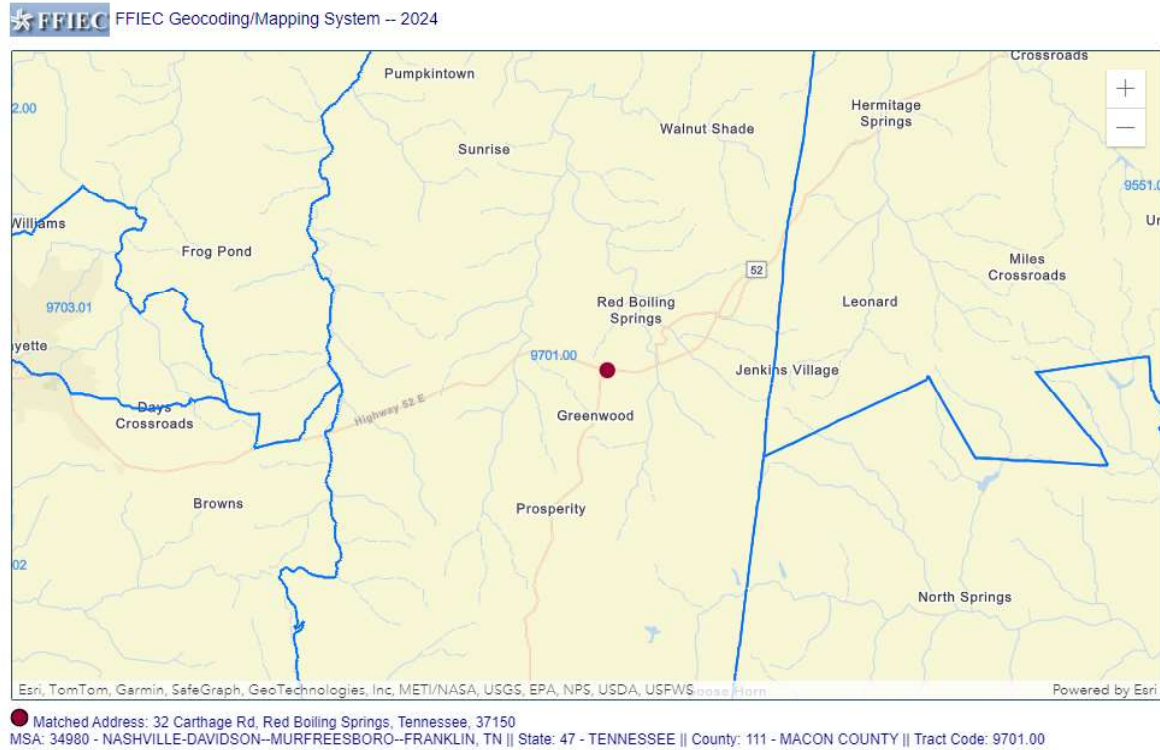
Branch Location XIV – Manchester (Manchester Branch)
1207 Hillsboro Blvd, Manchester, TN, 37355

FFIEC FFIEC Geocoding/Mapping System -- 2024



Matched Address: 1207 Hillsboro Blvd, Manchester, Tennessee, 37355
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 031 - COFFEE COUNTY || Tract Code: 9705.01

Branch Location XV – Red Boiling Springs (Red Boiling Springs Branch)
32 Carthage Rd, Red Boiling Springs, TN, 37150

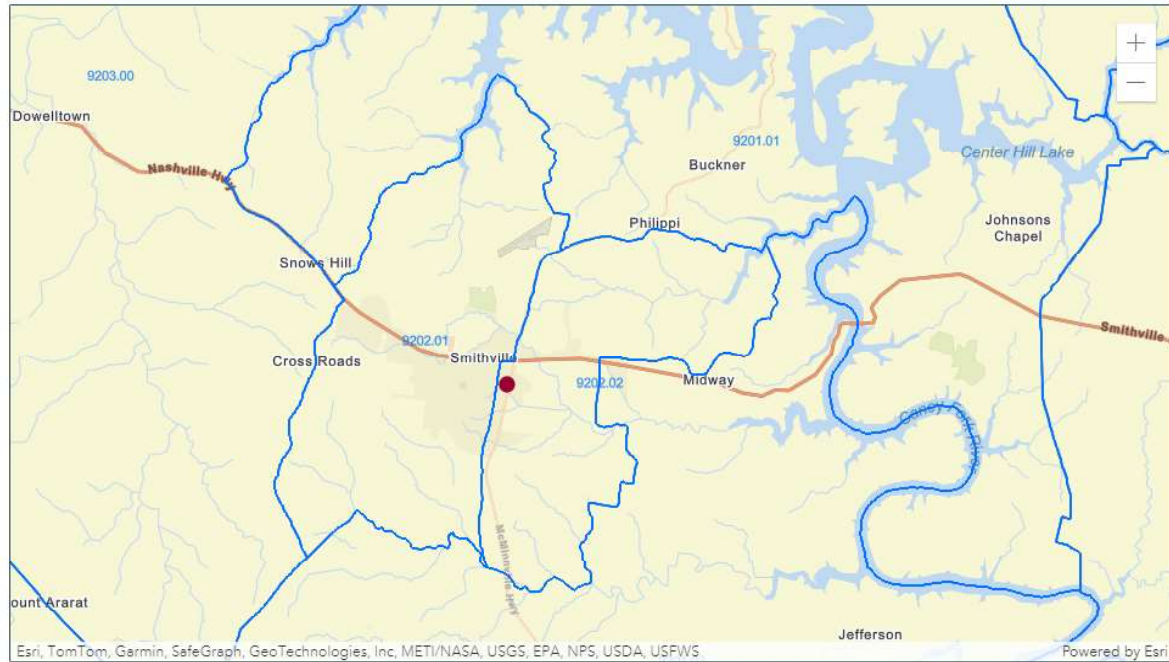


Branch Location XVI – Shelbyville (Shelbyville Branch)
1602 N Main St, Shelbyville, TN, 37160



Branch Location XVII – Smithville (Smithville Branch)
735 S Congress Blvd, Smithville, TN, 37166

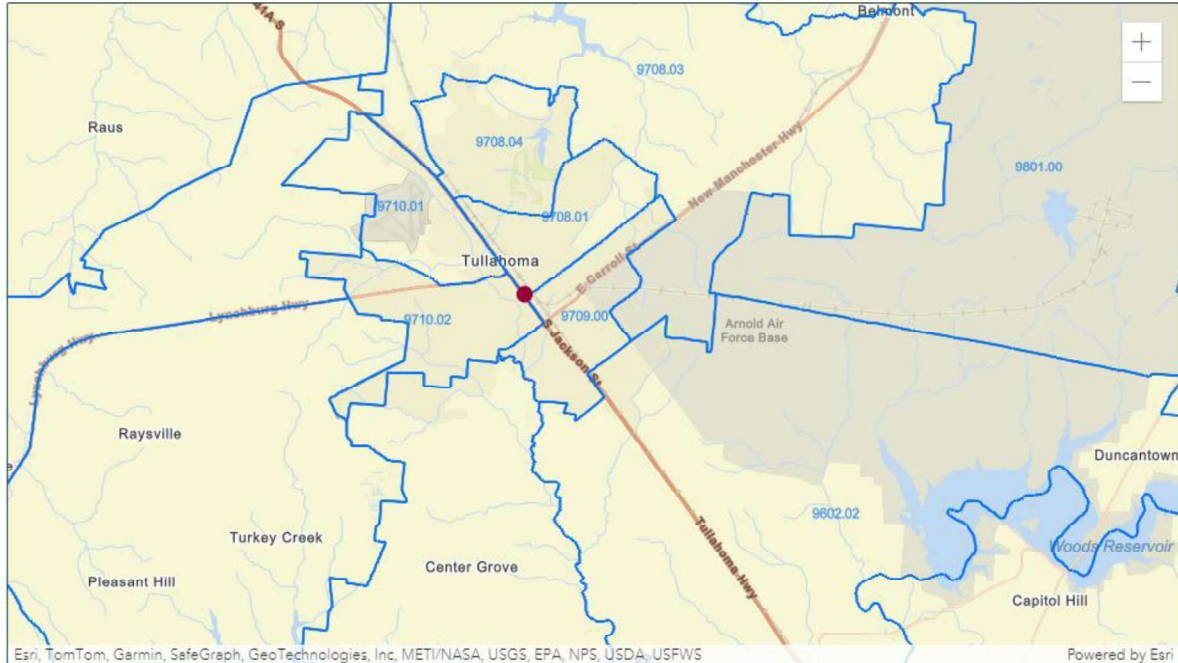
FFIEC FFIEC Geocoding/Mapping System -- 2024



● Matched Address: 735 S Congress Blvd, Smithville, Tennessee, 37166
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 041 - DEKALB COUNTY || Tract Code: 9202.02

Branch Location XVIII – Tullahoma (Tullahoma Main Branch)
120 N Jackson St, Tullahoma, TN, 37388

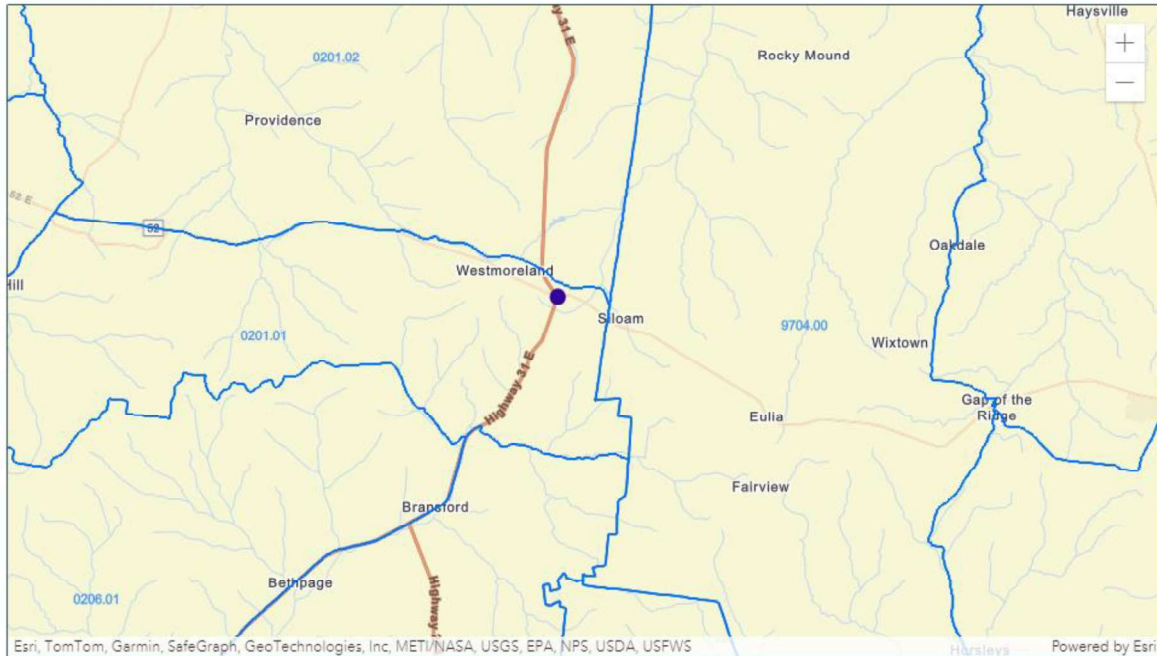
FFIEC FFIEC Geocoding/Mapping System -- 2024



● Matched Address: 120 N Jackson St, Tullahoma, Tennessee, 37388
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 031 - COFFEE COUNTY || Tract Code: 9708.01

Branch Location XIX – Westmoreland (Westmoreland Branch)
990 TN-52, Westmoreland, TN 37186

FFIEC FFIEC Geocoding/Mapping System -- 2024

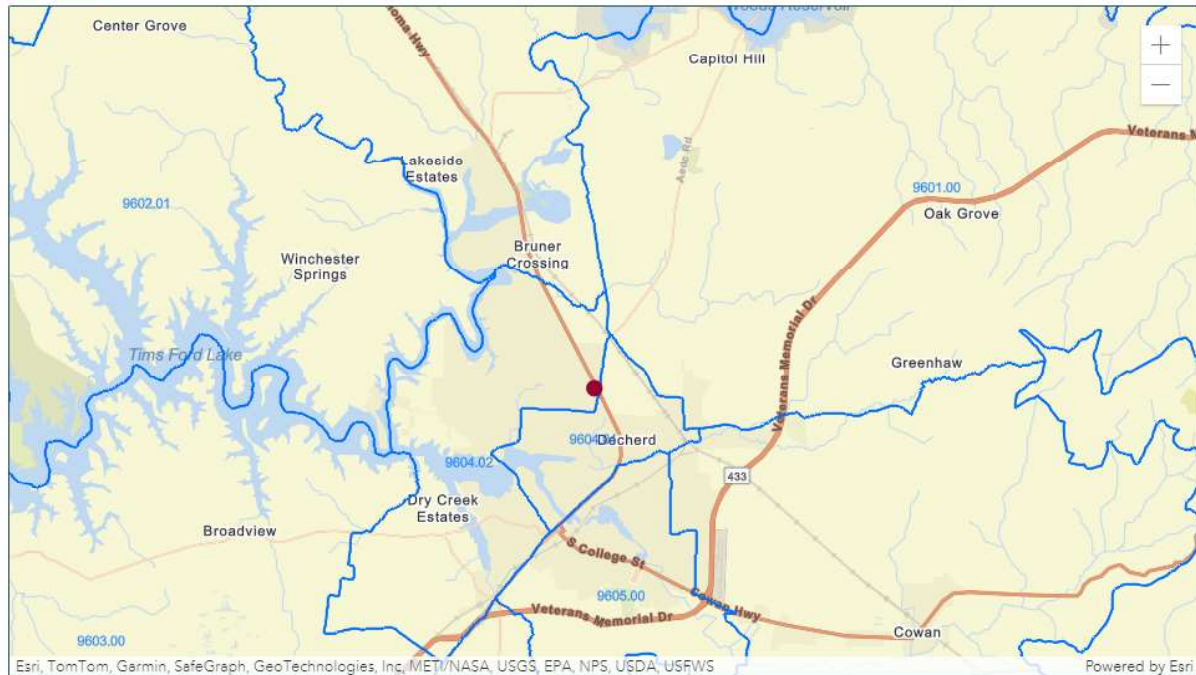


Matched Address:
MSA: || State: || County: || Tract Code:

Selected Tract
MSA: 34980 - NASHVILLE-DAVIDSON--MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 165 - SUMNER COUNTY || Tract Code: 0201.01

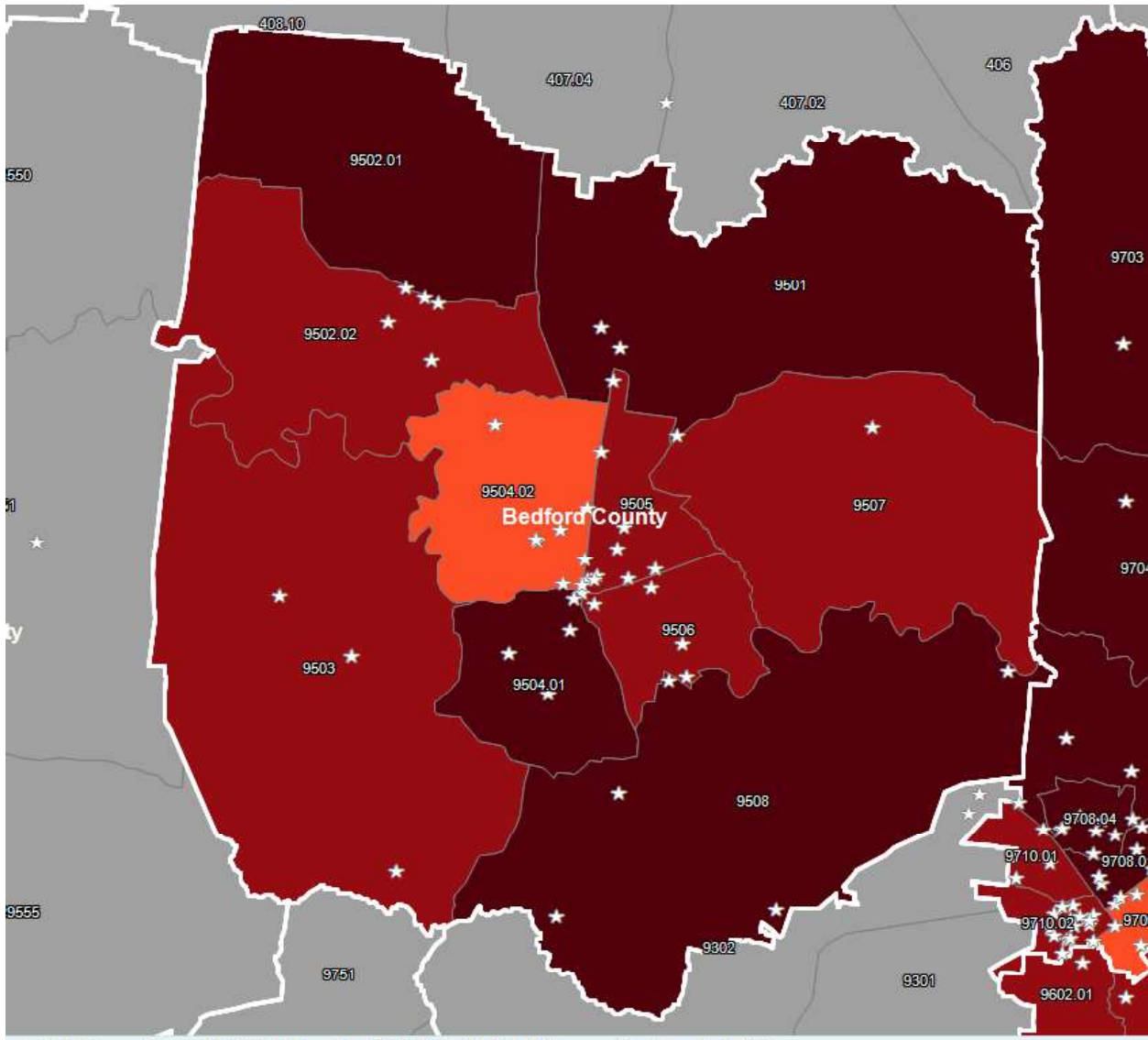
Branch Location XX – Winchester (Winchester Branch)
2695 Decherd Blvd, Winchester, TN, 37398

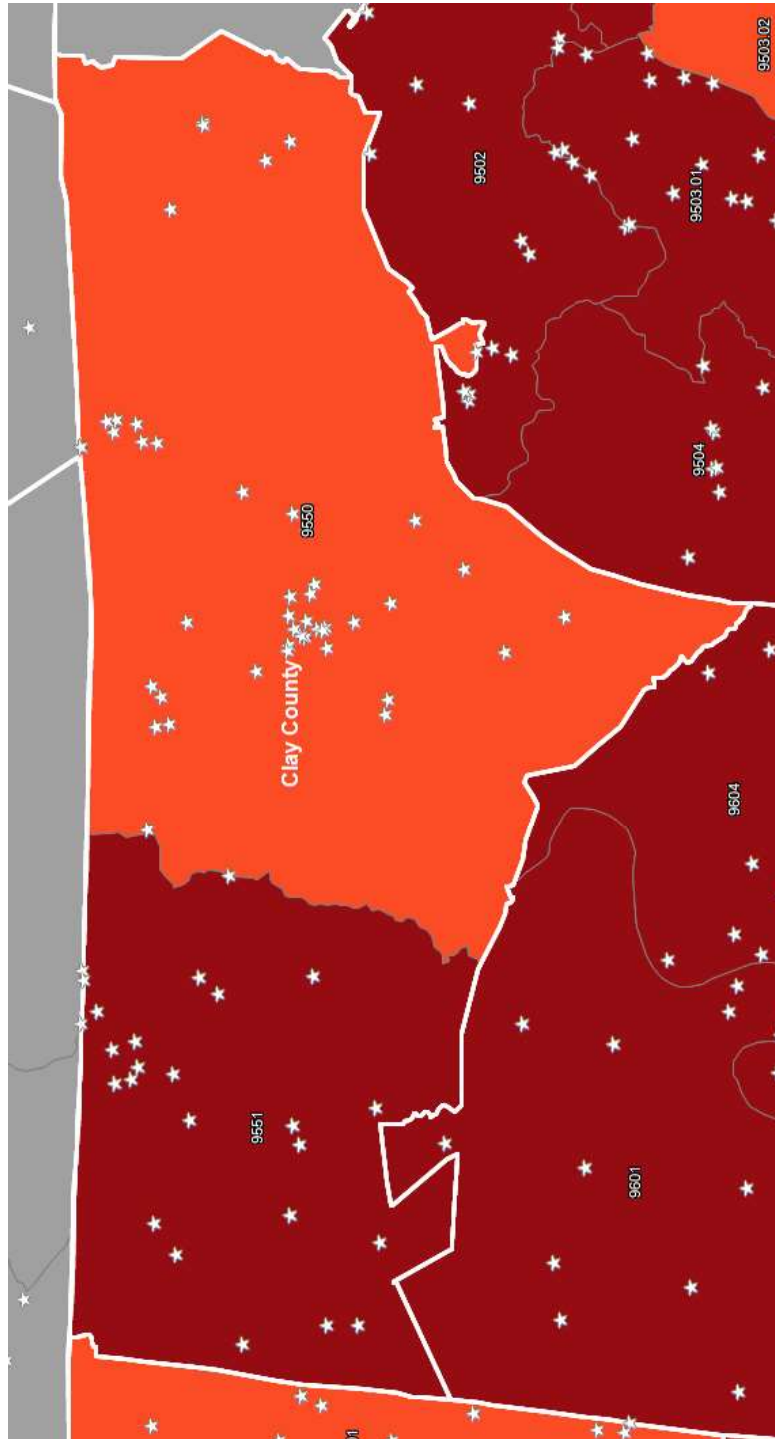
FFIEC FFIEC Geocoding/Mapping System -- 2024

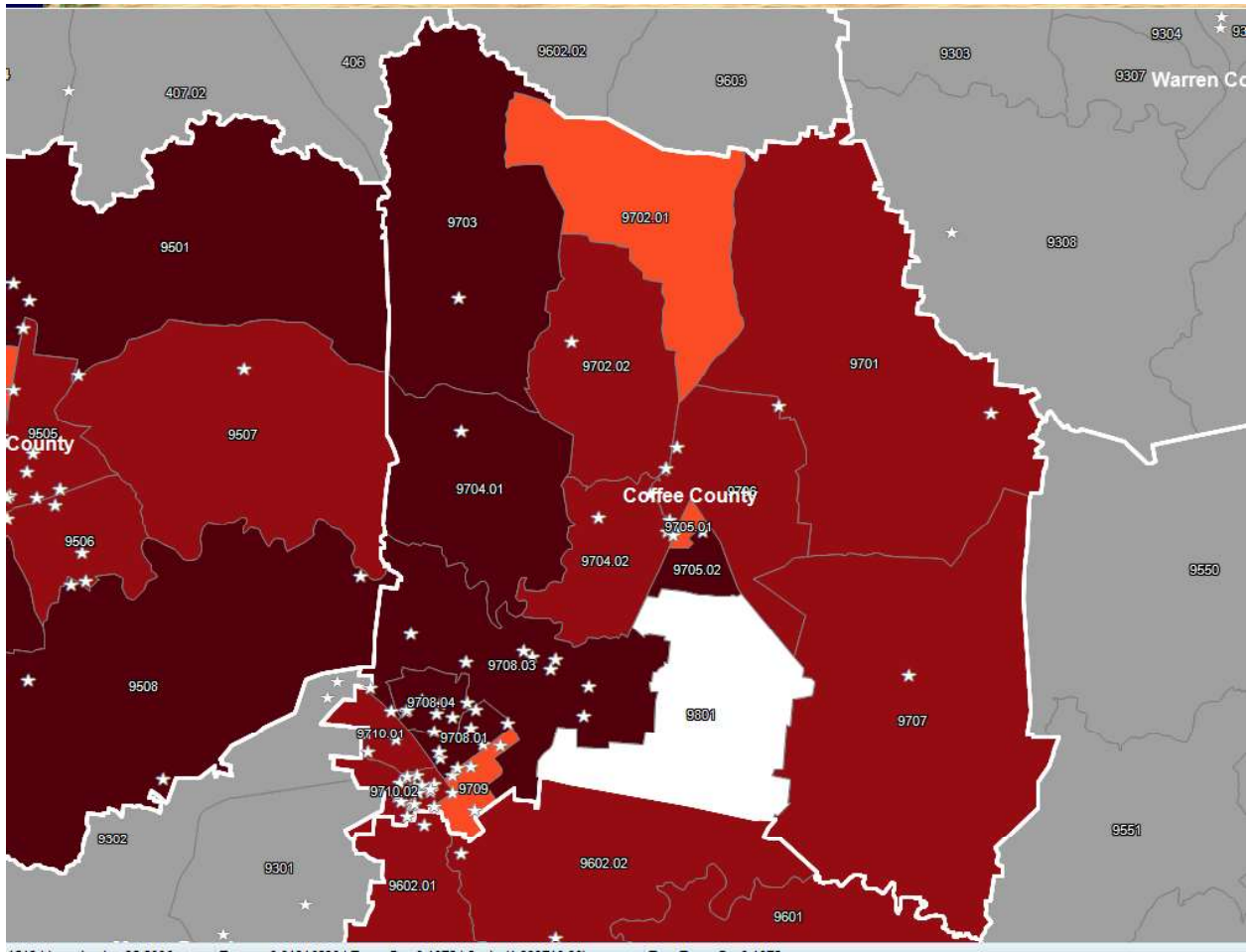


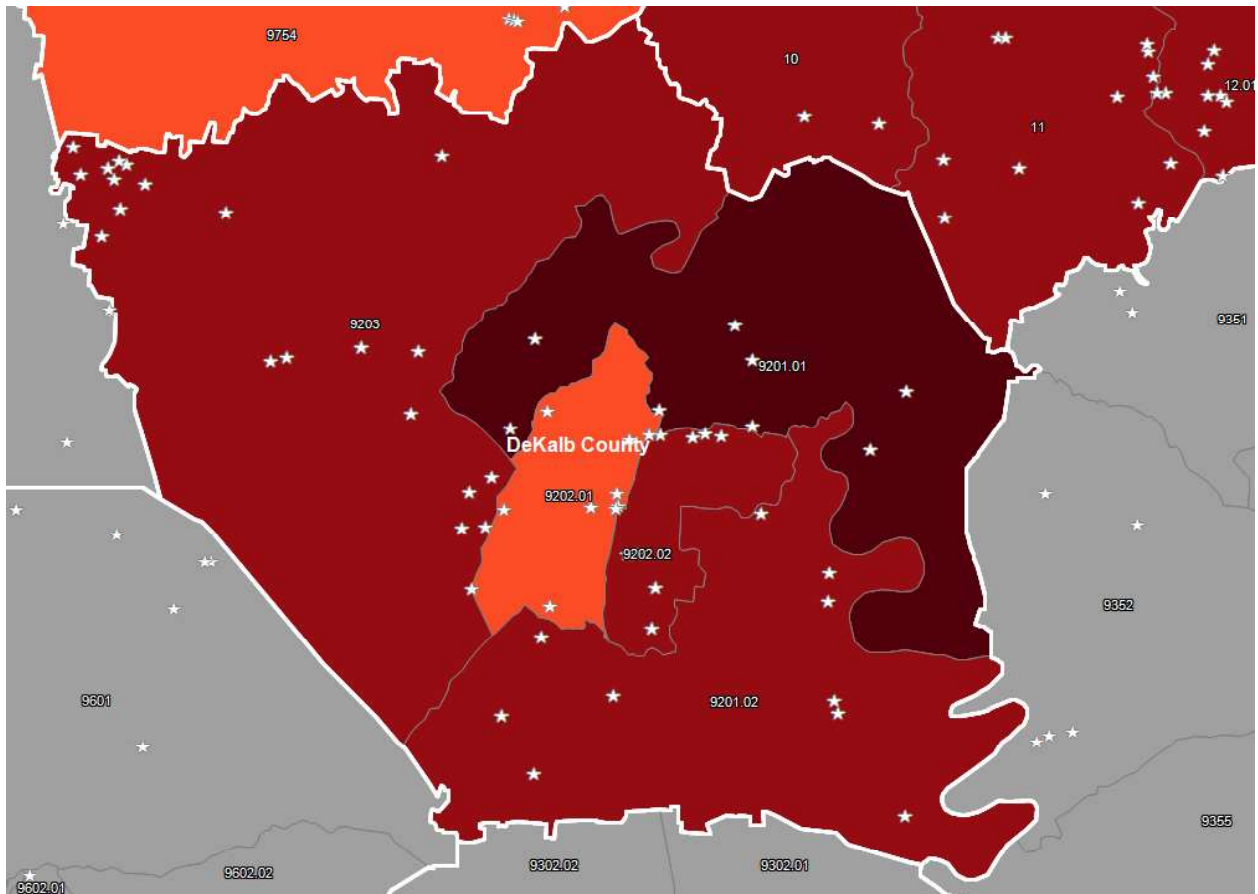
● Matched Address: 2695 Decherd Blvd, Winchester, Tennessee, 37398
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 051 - FRANKLIN COUNTY || Tract Code: 9604.02

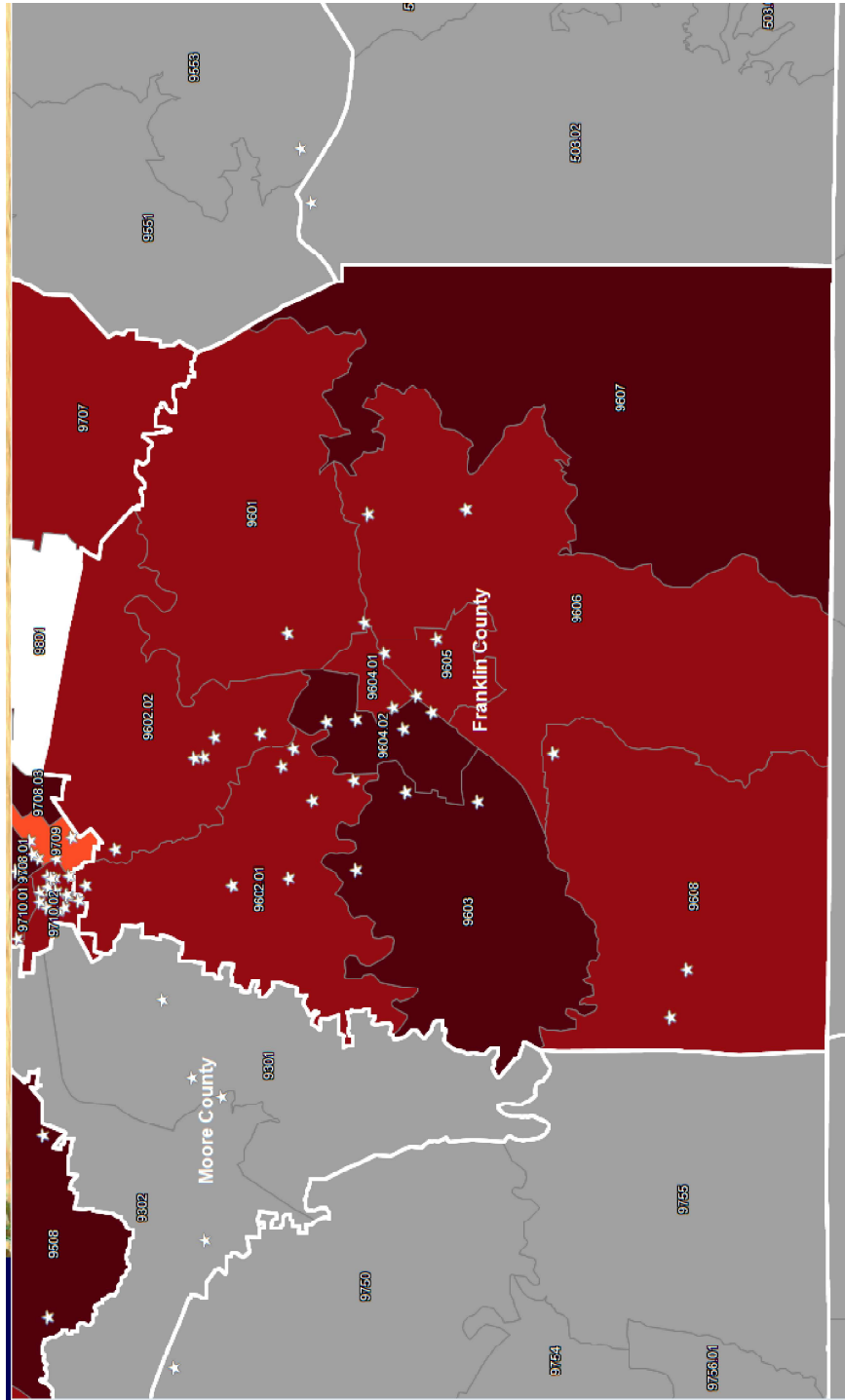
4 - Assessment Area and Census Tracts

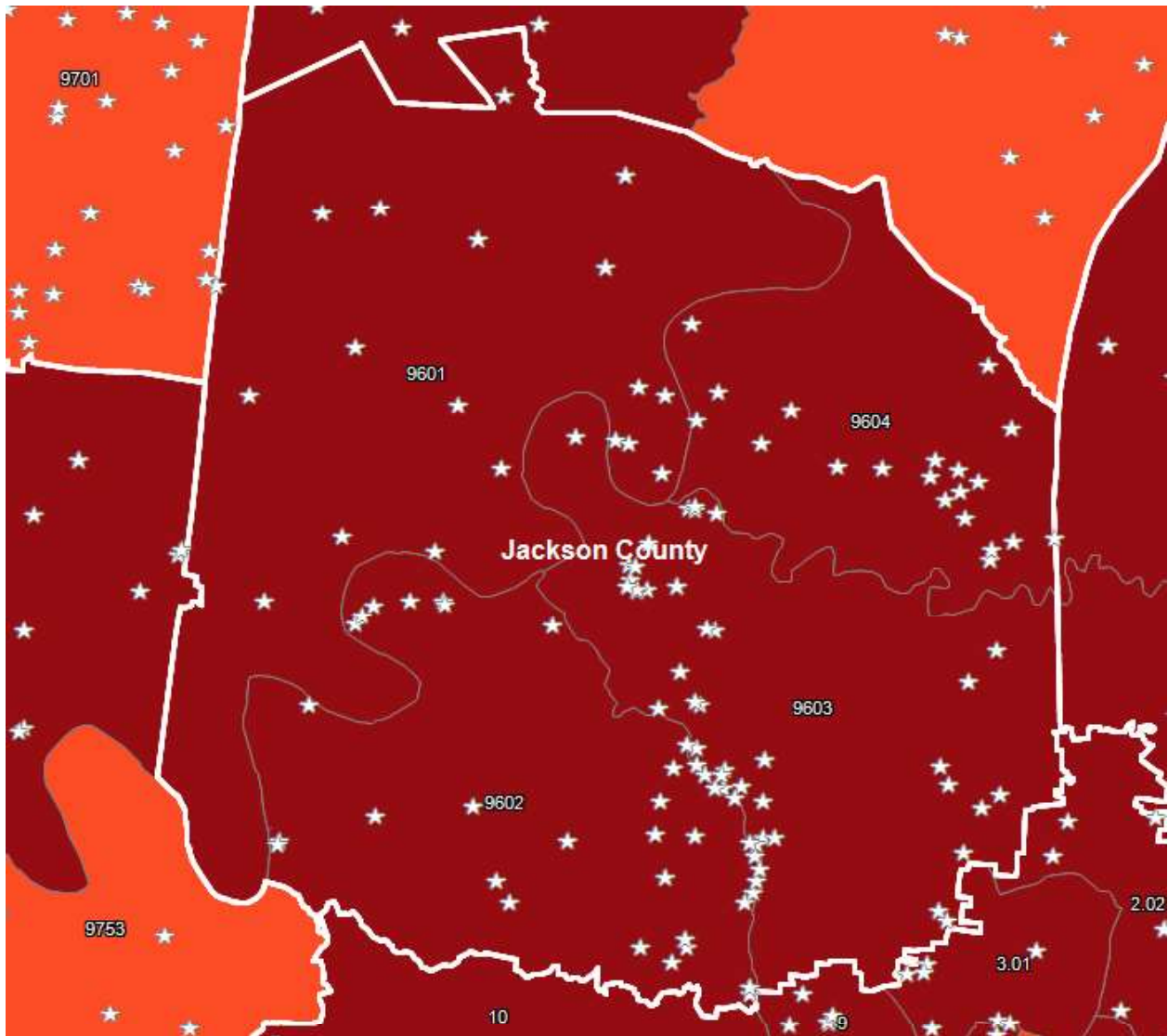


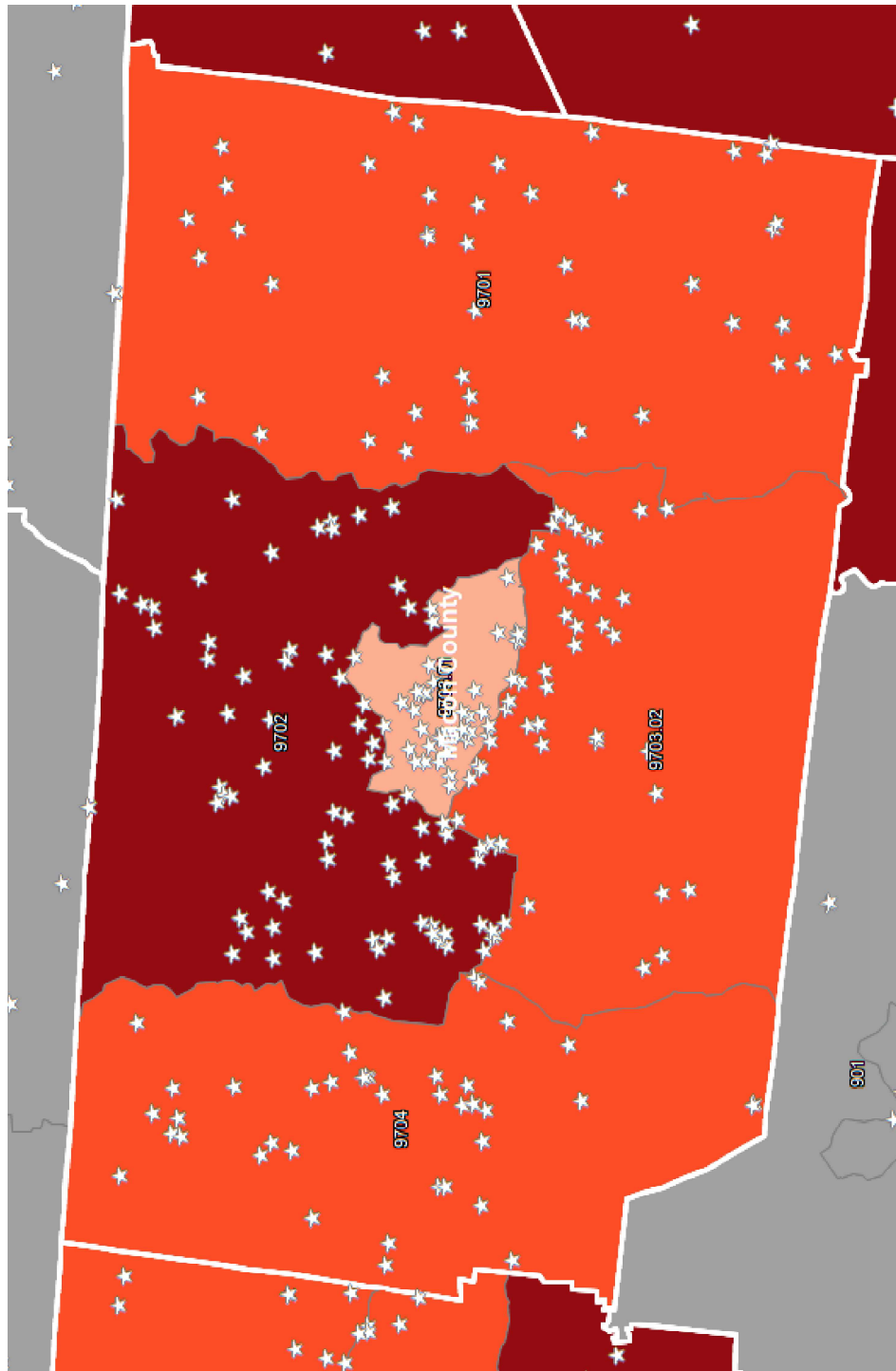


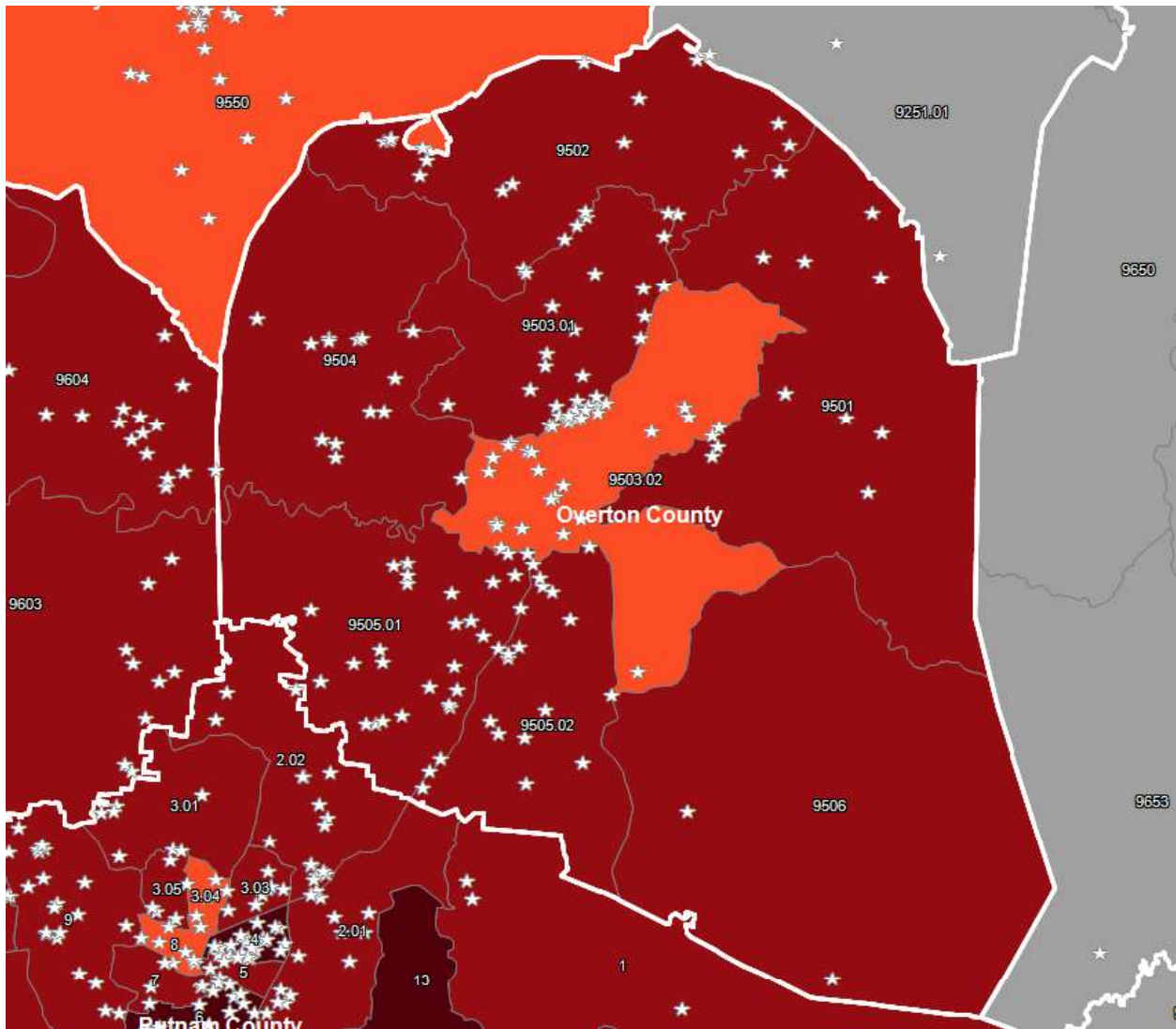


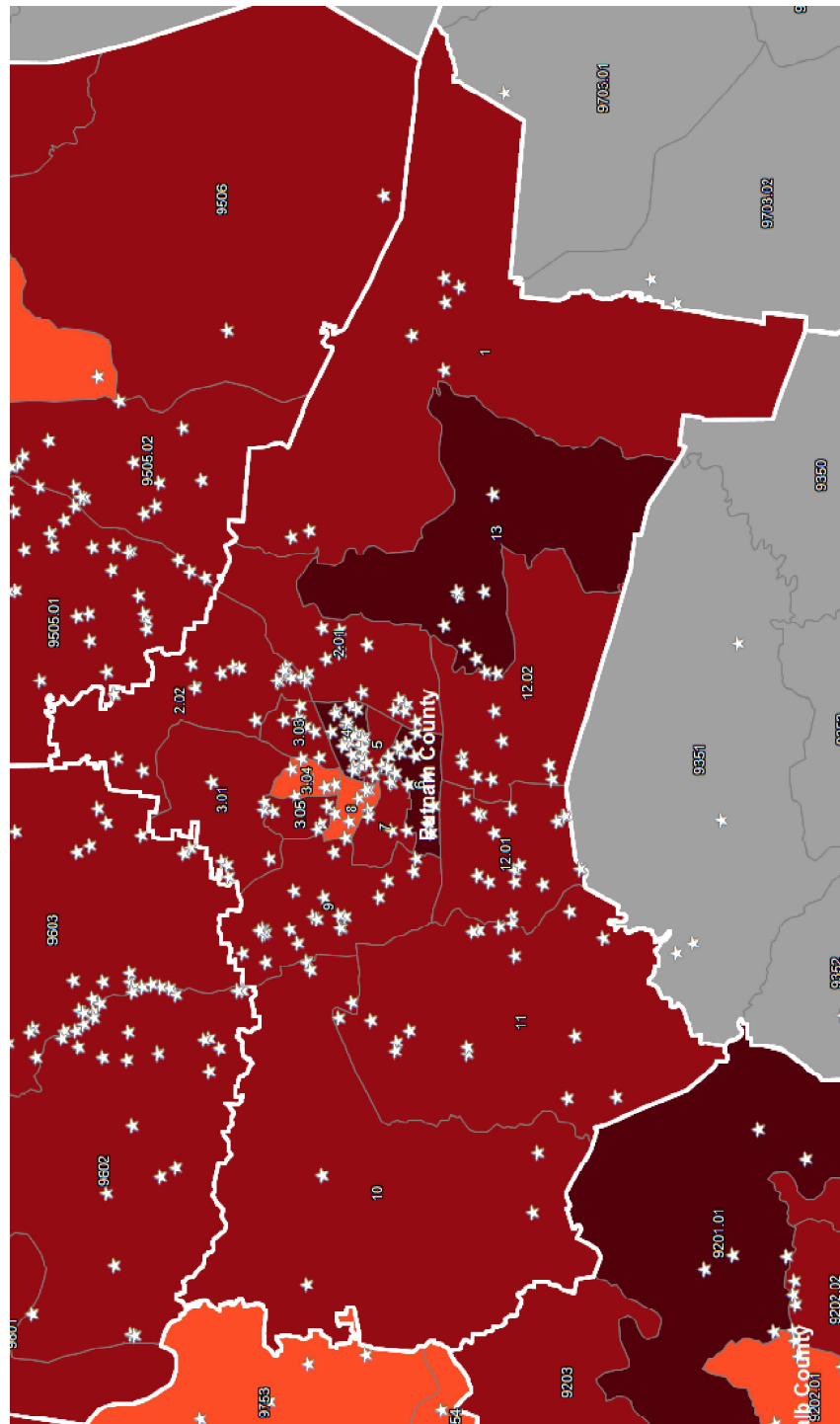


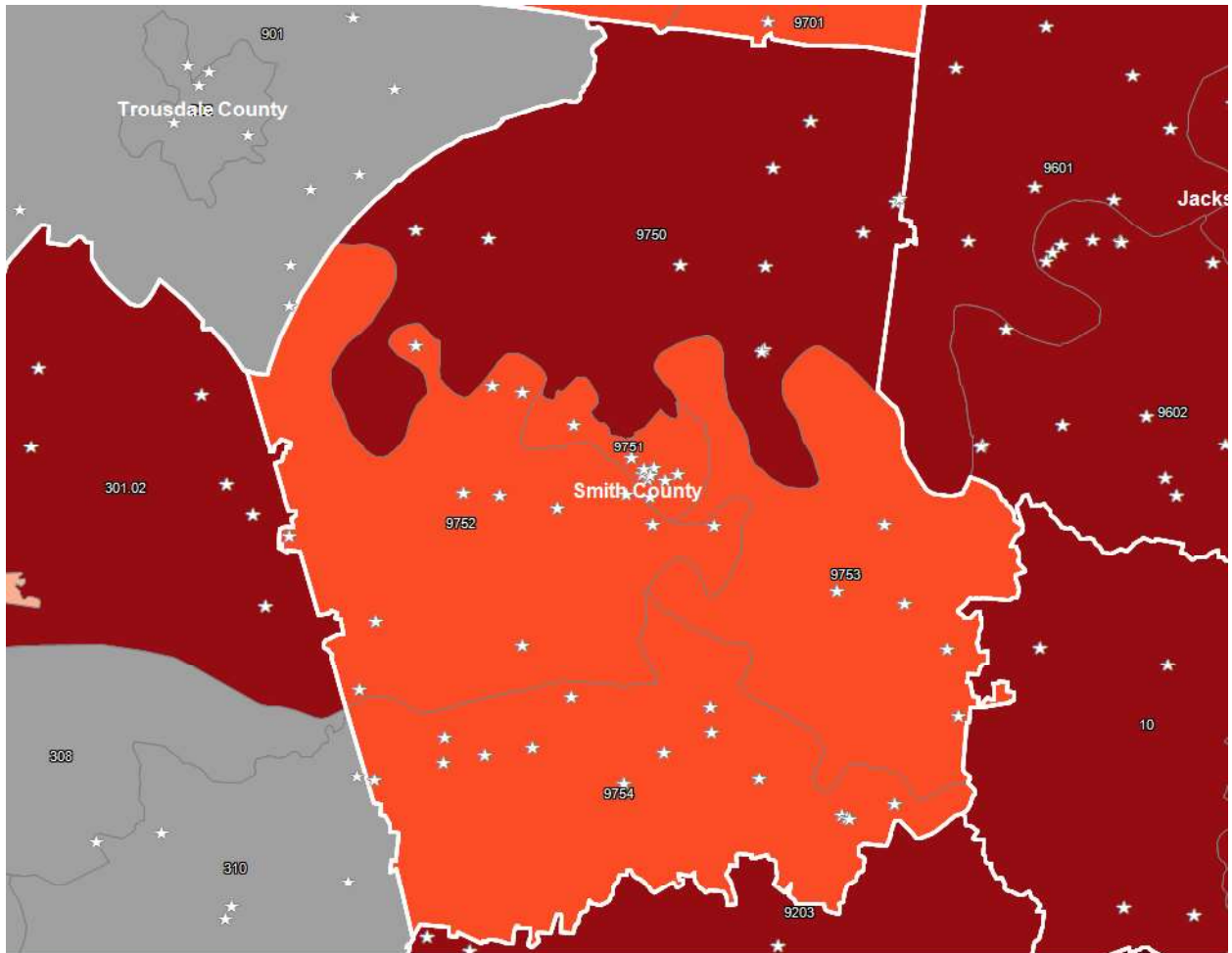


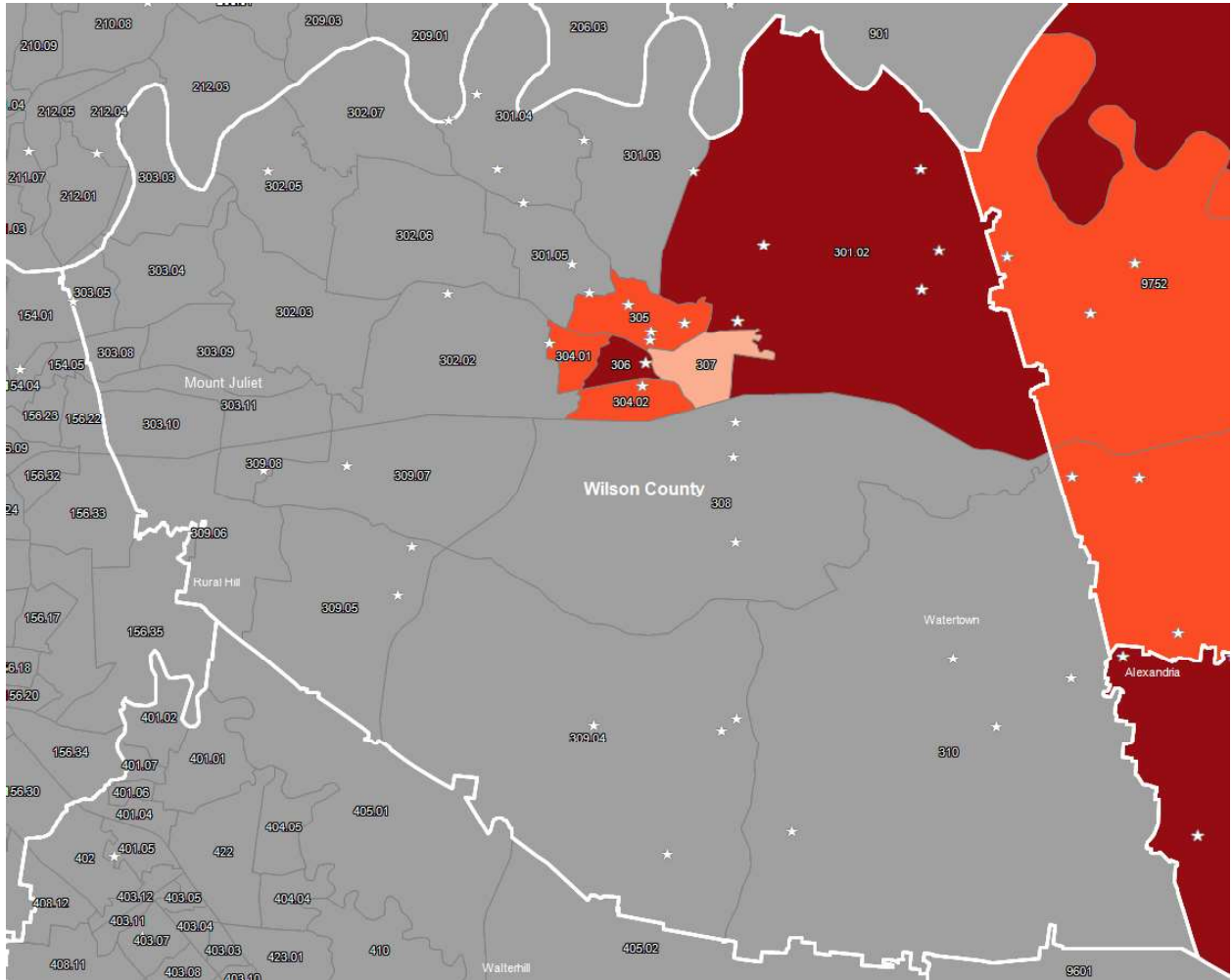












5 – Branch Opening and Closings

List of branches that were opened or closed during the current year, by quarter, and for the previous two years.

2025

January-March 2025

N/A

April-June 2025

N/A

July-September 2025

N/A

October-December 2025

N/A

2024

August 2, 2024 – Liberty Branch Closed. Address was 311 E Main St, Liberty, TN 37095. Census tract 470419203.00.

November 15, 2024 – Tullahoma West Lincoln Branch Closed. Address was 412 W Lincoln St, Tullahoma, TN 37388. Census tract 0470319710.02.

2023

No openings or closings

6 – Personal Banking Services

Online & Mobile Banking



Get ready for speed and convenience at your fingertips. With several different ways to bank, you now have your own personal Citizens Bank branch in the palm of your hands.

Compare the different mobile options and choose what is right for you!

	Mobile App	Mobile Web	Text Banking
Free! Carrier Data Charges May Apply	✓	✓	✓
Account Activity	✓	✓	✓
Transfers between eligible Citizens Bank Accounts	✓	✓	
Bill Pay and P2P (person to person) payments	✓	✓	
Mobile Deposit with the camera feature on your device	✓		
Locations of branches and free ATM's near you	✓	✓	
Help	✓	✓	✓
Security including device authentication and auto-signoff	✓	✓	



Let's Get Building...

Our home loan experts are here to help you make informed decisions whether you are planning to buy, build, update, or refinance your home.

[See Construction Loans >>](#)
[View All Mortgage Loans >>](#)



Wondering How Much You Can Afford?

We have a variety of calculators to help you with your financial planning. Here are just a few:

- [Mortgage Loan](#)
- [Mortgage Tax Savings](#)
- [Rent vs Buy](#)
- [Bi-Weekly Payment](#)

[View All Calculators](#)

Personal Checking



CHOOSE SECURITY AND VALUE WITH...

Citizens IDSecure Checking

Electronic Banking Package Features - Includes Online Banking, Online Bill Payment, E-statements, Mobile Banking, Mobile Check Deposit*, P2P Transfers, and 24-hour Telephone Banking

- Instant Issue **MasterCard Debit Card** (*school cards available*)
- Only \$25 Deposit to Open
- No Minimum Balance
- Unlimited Check Writing
- Overdraft Protection available for qualifying customers**
- **MoneyPass** - Get the cash you need, and never pay a surcharge fee with over 32,000+ MoneyPass ATMs from coast-to-coast.

SECURITY AND VALUE FEATURES:

- Up to \$10,000 Identity Theft Expense Reimbursement Coverage² – to cover expenses associated with restoring your identity.
- Fully Managed Identity Theft Resolution Services – access to a dedicated fraud specialist assigned to manage your case until your identity is restored.
- Credit File Monitoring – daily credit file monitoring and automated alerts of key changes to your single bureau credit report. **(registration/activation required)**
- Identity Monitoring – Monitoring of more than 1,000 databases and public records to identify suspicious activity, including credit header information, phone records, United States Postal Service records, and more. A risk rating is generated with each monthly scan and if your scan reflects a high-risk score, you will be notified. **(registration/activation required)**
- Credit Report – ability to request a single bureau report every six months or upon opening a resolution case. **(registration/activation required)**
- Credit Score^{3,4} – ability to request a single bureau score every month. **(registration/activation required)**
- Debit and Credit Card Registration - Register your credit, debit and ATM cards and have peace of mind knowing you can call one toll-free number to cancel and request replacement cards should your cards become lost or stolen. **(registration/activation required)**
- Credit Score Tracker⁴ – Receive valuable insight into your credit score³
- Online Identity Theft News Center **and Valuable Phone and Web Resources (registration/activation required)**
- Financial Wellness 360° - Access your financial wellness platform with unlimited one-on-one coaching, interactive courses, videos, booklets, infographics, and more to help maximize financial wellness. **(available online only)**

ADDITIONAL FEATURES:

- **Cellular Telephone Protection** - Receive up to \$300 of replacement or repair costs if your cell phone is stolen or damaged, in the U.S and abroad. Maximum of two claims per 12 month period. Covers the first three phone on a cellular telephone bill paid through your checking account. \$50 deductible applies.
- **\$10,000 Accidental Death and Dismemberment Insurance Policy** - Receive up to \$10,000 of 24-hour Accidental Death & Dismemberment Insurance. *(Coverage divides equally on joint accounts and reduces by 50% at age 70)*
- **Earn More Savings** - Earn a Higher Savings Rate when you open a new SaveUp Savings account at the same time as your new IDSecure, Reward, Gold Club, or SmartStart checking account. All it takes is a \$10 minimum transfer from checking to savings each statement cycle. [Learn More](#)

REGISTRATION AND ACTIVATION ARE EASY:

- Go to our [Activation Page](#) and follow the simple step-by-step instructions to register and activate benefits (access code is provided in your new account paperwork).

Monthly Fee: \$3.95 (free to age 23)

Paper Statement Monthly Fee: \$3.00

** OD disclosures apply

[Get Started](#)

CHOOSE INTEREST WITH...

Citizens Rewards Checking

Electronic Banking Package Features - Includes Online Banking, Online Bill Payment, E-statements, Mobile Banking, Mobile Check Deposit*, P2P Transfers, and 24-hour Telephone Banking

- Instant Issue **MasterCard Debit Card** *(school cards available)*
- Only \$25 Deposit to Open
- No Minimum Balance
- Unlimited Check Writing
- Overdraft Protection available for qualifying customers**
- **MoneyPass** - Get the cash you need, and never pay a surcharge fee with over 32,000+ MoneyPass ATMs from coast-to-coast.

CITIZENS REWARDS CHECKING FEATURES:

- **Earn Our Highest Checking Interest** - When you meet these minimum state cycle requirements:
 - 1) 16 MasterCard Debit Card purchases that post and clear
 - 2) One direct deposit that posts
 - 3) Receive your statements electronically *(E-statements)*
- **Annual Percentage Yield** - Annual Percentage Yield is subject to change. *(Interest rates payable based upon account balance)*

- **Disappearing Fee** - Monthly fee of \$3.95 disappears when you make 16 or more non-ATM debit card purchases that post and clear during the statement cycle.
- **Earn More Savings** - Earn a Higher Savings Rate when you open a new SaveUp Savings account at the same time as your new IDSecure, Reward, Gold Club, or SmartStart checking account. All it takes is a \$10 minimum transfer from checking to savings each statement cycle. [Learn More](#)

Monthly Fee: \$3.95 (disappearing fee available)

Paper Statement Monthly Fee: \$3.00

** OD disclosures apply

[Get Started](#)



CHOOSE YOUR GOLDEN YEARS WITH...

Citizens Gold Club Checking (for customers age 50 and better)

Electronic Banking Package Features - Includes Online Banking, Online Bill Payment, E-statements, Mobile Banking, Mobile Check Deposit*, P2P Transfers, and 24-hour Telephone Banking

- Instant Issue **MasterCard Debit Card** (school cards available)
- Only \$25 Deposit to Open
- No Minimum Balance
- Unlimited Check Writing
- Overdraft Protection available for qualifying customers**
- **MoneyPass** - Get the cash you need, and never pay a surcharge fee with over 32,000+ MoneyPass ATMs from coast-to-coast.
- Paper Statement mailed to your door upon request.
- Interest on Your Account (minimum balance applies)
- Special Events
- Complimentary Gold Club checks
- No fee for Cashier's Checks (limit 10 per month)
- 25% Discount on Safe Deposit Box

NEW BENEFITS:

- **Resolution Services** - Toll-free access to a dedicated consumer fraud recovery specialist who can walk you through the process of reclaiming your identity
- **Up to \$10,000 Identity Fraud Expense Reimbursement Coverage** - For expenses associated with clearing your name and repairing damaged credit should you fall victim to identity theft.
- **Earn More Savings** - Earn a Higher Savings Rate when you open a new SaveUp Savings account at the same time as your new IDSecure, Reward, Gold Club, or SmartStart checking account. All it takes is a \$10 minimum transfer from checking to savings each statement cycle. [Learn More](#)

Monthly Fee: \$4.95 (Keep an average daily balance of \$500 in this account and the monthly fee is eliminated)

*** OD disclosures apply*

[Get Started](#)



CHOOSE A NEW BEGINNING WITH...

Citizens SmartStart Checking & SmartStart Basic

Electronic Banking Package Features - Includes Online Banking, Online Bill Payment, E-statements, Mobile Banking, and 24-hour Telephone Banking

- Instant Issue **MasterCard Debit Card** (*school cards available*)
- Only \$25 Deposit to Open
- No Minimum Balance
- Unlimited Check Writing with SmartStart Checking (*no check writing with SmartStart Basic*)
- Overdraft Protection available for qualifying customers**
- **MoneyPass** - Get the cash you need, and never pay a surcharge fee with over 32,000+ MoneyPass ATMs from coast-to-coast.
- **Fresh Start** - Have you had troubled accounts in the past? SmartStart checking gives you the opportunity for a fresh start.
- **\$3 Savings with Direct Deposit** - Monthly fee of \$9.95 gets reduced to \$6.95 with regular payroll direct deposit.
- **Upgrade Accounts** - Qualify for one of our other great checking products after 18 months in good standing** with a ReStart Checking account.
- **Earn More Savings** - Earn a Higher Savings Rate when you open a new SaveUp Savings account at the same time as your new IDSecure, Reward, Gold Club, or SmartStart checking account. All it takes is a \$10 minimum transfer from checking to savings each statement cycle. [Learn More](#)

Monthly Fee: \$9.95 (can be reduced to \$6.95 with direct deposit)

Paper Statement Monthly Fee: \$3.00

*** Good standing is defined as a positive balance and no more than 1 NSF in the last six months.*

[Get Started](#)

Personal Savings

Regular Savings

Regular Savings is an interest bearing account.

Minimum Deposit to Open: \$10

Service Charge: \$2 fee per transaction after 18 withdrawals per quarter, \$5 fee if balance falls under \$300 with 2 years no activity

Comments

- Transaction limitations are as follows: You may make 6 withdrawals from account each month. A fee of \$2 will be assessed when more than 18 withdrawals during the statement cycle (quarterly).

[Get Started](#)

SaveUp Savings

Earn a higher Savings Rate when you open a new SaveUp Savings account at the same time as your new IDSecure, Rewards, Gold Club, SmartStart Checking or SmartStart Basic account. All it takes is a \$10 minimum transfer from your checking to savings each statement cycle.

Minimum Deposit to Open: \$10

Service Charge: \$2 fee per transaction after 18 withdrawals per quarter, \$5 fee if balance falls under \$300 with 2 years no activity

Comments

- Transaction limitations are as follows: You may make 6 withdrawals from account each month. A fee of \$2 will be assessed when more than 18 withdrawals during the statement cycle (quarterly).

[Get Started](#)

Money Market Savings

Money Market Savings is a tiered interest bearing account, earning higher rates for higher balances (interest paid monthly).

Minimum Deposit to Open: \$2,500

Minimum Balance to Earn Disclosed Interest Rate: \$2,500

Minimum Balance to Avoid Service Charge: \$2,500

Service Charge: \$5

Comments:

- Competitive tiered interest, rewarding larger balances with higher rates.
- Up to 6 withdrawals or transfers per calendar month (an excessive debit fee of \$5 for every debit over 6 per monthly statement cycle).
- Monthly image statements mailed.

[Get Started](#)

Kids Club Savings

Kids Club Savings is an interest bearing account that earns a premium rate.

Minimum Deposit to Open: \$5

Service Charge: \$2 fee per transaction after 18 withdrawals per quarter

Comments

- Transaction limitations are as follows: You may make 6 withdrawals from account per quarter. A fee of \$2 will be assessed when more than 18 withdrawals during the statement cycle (quarterly).
- Account is for children age newborn to 13 years.

[Get Started](#)

Christmas Club Savings

Christmas Club Savings is an interest bearing account that earns a premium annual interest rate. Interest paid on balance at maturity.

Minimum Deposit to Open: \$10

Withdrawals Allowed: 1 (checks mailed in November)

Service Charge: \$10 fee for early withdrawal

Comments:

- Maximum deposit of \$250 per week or \$1,000 per month.
- Transaction limitations are as follows: Checks will be mailed to account holder in November. A fee of \$10 will be assessed for early withdrawals.

[Get Started](#)

Vacation Club Savings

Vacation Club Savings is an interest bearing account that earns a premium annual interest rate. Interest paid on balance at maturity.

Minimum Deposit to Open: \$10

Withdrawals Allowed: 1 (checks mailed in May)

Service Charge: \$10 fee for early withdrawal

Comments

- Maximum deposit of \$250 per week or \$1,000 per month.
- Transaction limitations are as follows: Checks will be mailed to account holder in May. A fee of \$10 will be assessed for early withdrawals.

[Get Started](#)

Personal CDs & IRAs

Certificate of Deposit (CD)

Minimum Deposit to Open: \$2,500

Service Charge: Early withdrawal penalties apply

Comments:

- 7-31 Days
- 3 month
- 6 month
- 12 month
- 18 month
- 24 month
- 36 month
- 48 month
- 60 month

Individual Retirement Account (IRA)

Minimum Deposit to Open: \$500

Service Charge: Early withdrawal penalties apply

Comments:

- IRA's are available for long term investments.
- Great tax deferral vehicle for saving for retirement.

Roth IRA

Minimum Deposit to Open: \$500

Service Charge: Early withdrawal penalties apply

Comments:

- IRA's are available for long term investments.
- Valuable future tax-free income in retirement.

Educational IRA

Minimum Deposit to Open: \$500

Service Charge: Early withdrawal penalties apply

Comments:

- Educational IRA's are available to help with college expenses.
- Transfers are flexible.
- Earnings are non-taxable.
- Funds can be passed on to another child.

Personal Debit Cards

No More Waiting With Card@Once

No one likes to wait, especially when it comes to accessing funds from your newly opened account. But account holders are often asked to wait for up to 10 days to receive their new or replacement debit card and PIN in the mail.

With Citizens Bank's Card@Once, the wait is over! Card@Once is a comprehensive solution that enables our friendly staff to create and distribute fully functioning, personalized debit cards onsite in ten of our nineteen branch locations.

Which Card Is Right For You?

With a new Citizens Bank checking account, you have several options regarding a new "chip-enabled" Debit MasterCard. Our Debit Card carries a purchase limit of \$1,500 and also allows you to have quick access to cash at one of our convenient ATM Locations.

Your new card features an embedded chip that improves security every time you make a purchase at a chip-enabled terminal. The chip technology creates a unique code for each transaction that is difficult to duplicate, reducing the risk of fraudulent charges on your account.

All we need to know is, which card is right for you?

School Card

Our School Card program is for any consumer checking account. This program offers our consumer a way to show their school spirit by promoting a local school on their Debit MasterCard. In addition, we will donate \$.05 per credit transaction (non-pin) to benefit the school you choose for your School Card. Our CardCash™ program is not available for accounts with school cards.

Show your school PRIDE! With our new School cards, \$.05 per credit transaction will be donated to your community school!







Regular Debit

Don't want a specific program, but still want the convenience of a debit card? You can make purchases in person, online or by phone using your new Regular Debit MasterCard. Debit MasterCard is accepted at millions of locations worldwide.

If you have any questions please contact us toll free at 1-866-666-2195.



Real Time Debit/ATM Processing

Real Time processing allows Citizens Bank the ability to post transactions to your account within seconds after they occur.

How does Real Time processing benefit you?

- "Real Time" immediate access to deposited funds with your ATM/Debit Card
- "Real Time" immediate posting of your ATM/Debit card transactions
- "Real Time" immediate balance updates at ATM Terminals

Visit our [Real Time Processing](#) page for more information.

Benefits for Debit MasterCard® (enhanced)

1. Automated Biller Update (ABU) helps to update card information for recurring payments.
 2. Zero Liability**
 3. Protects your cardholders against unauthorized purchases on your card should your card be lost or stolen. Emergency Card Replacement*
 4. Emergency Cash Advance*
 5. Lost/Stolen Card Reporting*
 6. Shopper Benefits *
- Extended Warranty – Doubles the time period and duplicates the coverage of the original manufacturer's or U.S. store brand warranty on new products for a maximum of one year.
 - Price Protection - Guarantees cardholders the best price on new products purchased with an eligible card by providing a refund on the difference, if you find a lower price within 60 days of purchase.
 - Satisfaction Guarantee - Provides up to \$250 per new product, if your cardholders become dissatisfied with their product within 60 days of purchase and the merchant will not accept a return.

* Certain restrictions, terms, and conditions apply. Contact 1-800-MasterCard for full details.

** Certain restrictions apply. Please [click here](#) for more details.

Personal Credit Cards - Consumer

Choosing the right credit card is easier than ever. Whether you want to pay down balances faster, maximize cash back, earn rewards or begin building your credit history, we have the ideal card for you!

No matter which card you choose, you'll enjoy important features like:

- Convenient and Flexible Purchasing Power. Accepted at millions of locations worldwide.
- Mobile purchasing capability for added convenience.
- Zero Fraud Liability.* You won't be liable for fraudulent purchases when your card is lost or stolen.
- Cardmember Service available 24 hours a day/365 days per year.
- Plus much more!

[APPLY NOW](#)

Credit Card Member Services

Already a Citizens Bank credit card member? Click below to view your "My Account Access" to view your credit card statements, make payments, view your rewards, etc.
One link for all your credit card services!

[My Account Services Log In](#)

Personal Overdraft Privilege

When it comes to managing money in your checking account, we know mistakes can happen. Citizens Bank offers an Overdraft Privilege Service (ODP). If your account qualifies for Overdraft Privilege, we will consider without obligation on our part, striving to pay items for which your account has insufficient or unavailable funds, instead of returning those items unpaid. Your transactions will be honored until your account exceeds ODP limits.

What You Need to Know About Overdrafts and Overdraft Fees

An overdraft occurs when you do not have enough money in your account to cover a transaction, but we pay it anyway. We can cover your overdrafts in two different ways:

1. We have standard overdraft practices that come with your account.
2. We also offer overdraft protection plans, such as Overdraft Privilege, Linked Account, and an Overdraft Line of Credit.

What are the standard overdraft practices that come with my account?

We do authorize and pay overdrafts for the following types of transactions:

- Checks and other transactions made using your checking account number
- Automatic reoccurring bill payments

We do not authorize and pay overdrafts for the following type of transaction unless you ask us to and opt in:

- ATM transactions
- Everyday debit card transactions
-

We pay overdrafts at our discretion, which means we do not guarantee that we will always authorize and pay any type of transaction.

If we do not authorize and pay an overdraft, or if you have opted out, your transaction will be declined.

What fees will I be charged if Citizens Bank pays my overdraft?

Under our standard overdraft practices:

- We will charge you a fee of up to \$28 each time we pay an overdraft.
- There is no limit on the total fees we can charge you for overdrawing your account.

What if I want Citizens Bank to authorize and pay overdrafts on my ATM and everyday debit card transactions?

If you also want us to authorize and pay overdrafts on ATM and everyday debit card transactions, you may opt in to this service by clicking below, by calling (866) 666-2195, or by visiting one of our branches.

[Opt In Now](#)

If you do not use Overdraft Privilege Service, it costs you NOTHING! Overdrafts are due and payable immediately. Please be aware that the payment of items is not a guarantee. The payment of items presented today does not guarantee that future items present will be paid. All items whether paid or returned are subject to a \$28 overdraft or non-sufficient fund fee.

Checking accountholders may opt out of all overdraft coverage at any time. Opting out of the Overdraft Privilege service may mean that items presented will be returned and a \$28 non-sufficient funds fee will be charged.

Deminimus Amount:

Our deminimus amount is \$5.00. There will be no fee for items which overdraw an account up to, but not exceeding, \$5.00 on any business day.

For more information on any of our Overdraft Services, please see our Overdraft Privilege Disclosure below.

[Overdraft Privilege Disclosure](#)

Personal Services

ATMs

For your convenience, access your account information 24 hours a day – 7 days a week. Make deposits, withdrawals, check account balances and transfer funds. We now offer surcharge-free ATMs. The MoneyPass network offers thousands of surcharge-free ATMs coast to coast located where you live, work and travel. This locator will help you find the most convenient ATM location to use your MoneyPass card surcharge-free.

Visit www.moneypass.com to find out more.

Bank by Mail

Special envelopes are provided free to our checking and savings customers for this convenient service.

Cashier Checks

Cashier checks can be purchased at any of our branches.

Debit Card

Our MASTERCARD debit card makes it faster and easier to make purchases in person, online, or by phone. If you need cash, our debit card also serves as an ATM card. We also offer a free business debit card for business customers. To Report a Lost or Stolen Debit Card after hours please call 1-800-264-5578 and they will be happy to assist you.

Image Statements

Reviewing and filing your statements has never been easier. Each month we'll send you reduced images of your checks numerically.

Linked Accounts

Linked Accounts allow you to authorize us to automatically transfer funds from one account to another for a minimal fee of \$3.00 when balances fall into the negative. These transfers can be made from another checking account or a savings account (restrictions apply to savings). Linked Accounts allow you to take charge of your finances and limit overdraft or NSF fees at the same time.

Mobile App

Our mobile app is available from iTunes and Google Play store, and they are free to any customer with a checking, savings, or loan account. Please visit [Online & Mobile Banking](#) to find out more.

Mobile Check Deposit

Deposit checks into your account without ever visiting a branch. It is as easy as taking a picture. Please visit [Online & Mobile Banking](#) for more information and to get approved.

Night Depository

Unable to make it to the bank during business hours? Use our convenient night deposit box to secure your banking transactions. All transactions dropped off after business hours are processed at the beginning of the next business day.

Overdraft Privilege

Our overdraft privilege is designed to automatically assist you when you may inadvertently or have the occasional need to overdraw your checking account. This service allows the insufficient checks to be paid, charging you our normal overdraft fee of \$28, without the worry of embarrassment and another return check charge from the retailer.

Notary Service

This service is available at no charge to our customers.

Safe Deposit Box

We offer several sizes of safe deposit boxes at many of our locations. Please contact your local branch for sizes and availability.

Telephone Banking

This 24-hour service enables you to access your personal account information using any touch tone phone 24 hours a day, 365 days a year. With phone banking, you may perform the following functions: Get current balance information, Gather information on your loan accounts, or Review recent transactions. To use this service simply call toll free at 1-800-318-5540.

Wire Transfers

Wire transfers are a quick and easy way to transfer money from one bank to another. Citizens Bank originates and receives both domestic and international wires.

For questions regarding account services and fees, please visit our [Schedule of Fees](#) page.

Real Time Processing

Real-Time Debit Card Transaction Processing

Citizens Bank processes all debit card account transactions and deposits in real time.

With real-time processing, your account will automatically be updated whenever a transaction is processed with your Citizens Bank debit card. Whether you use your debit card every two minutes or every two hours, you'll appreciate having the most up-to-date account information available. This information is immediately accessible with your Citizens Bank smartphone app or eBanking account.

How it Works

When you swipe your card at a business, an authorization will take place immediately. This initial authorization will appear right away on your account and be visible to you through eBanking. Once the business closes their debit card transactions and sends them for processing, the actual transaction will post to your account. Depending on when a business processes their activity, a transaction could be pending for 1 day or 3 days.

Debit Card Authorization Vs. Posted Transaction

The initial authorization and the actual posted transaction may differ in amounts, depending on where you use your debit card. The following are a few examples of when the authorization and actual transaction may be different:

- Pay-at-the-pump gas station authorizations will always be different than the actual amount that posts to your account. Gas stations don't know how much your total fuel purchase will be until it is completed. The authorization amount will verify the validity of the card and the actual transaction that's posted to your account will be for the amount of your fuel purchase.
- Restaurants often authorize the transaction for 20% more than your bill. They will then adjust your transaction to correctly reflect the tip amount. This will be the amount that posts to your account.
- Hotels usually authorize for amounts greater than the agreed-upon amount to cover any incidentals or extra charges. At the end of your stay, the actual charges will be processed and posted to your account.

Checks & Deposits

Any check you cash or deposit at a Citizens Bank branch will reflect your available balance within seconds. These items will then process and post to your account during the business day on which they were received. If you cash a check at another bank or write a check to a merchant, we will post it to your account on the business day on which we receive it.

Enhanced Security

Real-time processing will also help further protect your account from potential fraud. With automatic updates to your account balance, you'll be able to view all your account transactions right away. If you notice any suspicious activity on your account, report it immediately to Citizens Bank.

Contact Us

Please visit our [Contact Us](#) page, or feel free to call us at 866-666-2195 if you have any questions regarding real-time processing. We appreciate your business and look forward to providing continued service enhancements as we help you with all your financial needs.

Personal Loans

Consumer

If you're looking for a predictable monthly payment, consider a Personal Loan from Citizens Bank. You'll be able to consolidate high interest rate debt, finance a large one-time purchase, or pay for unexpected expenses. We can customize a personal loan with a variety of repayment terms to fit your budget.

Comments:

- *We offer both secured or unsecured loans.*
- *Loans may be used to finance a variety of needs including vacations, vehicle purchases, consolidate other obligations, and many other personal needs.*
- *Electronic payments from deposit accounts at Citizens Bank are available for your convenience.*
- *Personal loans are granted on the basis of a customer's financial history but collateral may be required.*
- *Various fees may be assessed according to the type of collateral and terms.*

[**Get Started**](#)

Mortgages

Adjustable Rate Mortgage

If you want to finance your personal dwelling and you are going to live or own that dwelling for 3-5 years, this is your loan.

Comments:

- *Low closing costs and comfort of dealing with a hometown bank.*
- *No Points.*
- *Rates are adjusted on three and five year intervals.*
- *Lifetime cap on primary residence mortgage loans.*
- *Long-term amortization periods available.*
- *Typically low fees.*

[**Get Started**](#)

Conventional Fixed Rate Mortgage

If you are ready to buy your dream home or refinance your current one, this is the right loan for you.

Comments:

- *Low, competitive rates and affordable payments.*
- *Friendly service and decisions made by local people you know and trust.*
- *Fixed rate and monthly payment for the life of your loan.*

- *Easier to budget and plan for.*

[Get Started](#)

Freedom Line of Credit

Anyone who owns any type of real estate and has equity in that real estate.

Comments:

- *Freedom to use money for whatever your needs might be.*
- *Secured by 1st or 2nd mortgage on most any real estate, including primary residence, 2nd homes, rental homes, farm land, & commercial property.*
- *Five or ten year repayment with interest only payments monthly.*
- *Please note that a balloon payment may result and the offer is subject to credit approval.*

[Get Started](#)

To see what you can afford, visit our [Calculator](#) page, and click on "Mortgage".

Construction

Are you wanting to build that dream home or perfect business? Building a new home or business could be one of the most exciting and rewarding projects you'll ever undertake. Citizens Bank offers a number of construction loans designed to help you finance the building of your new home.

Comments:

- *Interest payments calculated on advances made and not the total loan commitment.*
- *Various fees may be assessed according to the type of collateral and terms.*
- *\$300 Construction Appraisal with or without permanent financing.*

[Get Started](#)

Agriculture

Agriculture has long been a thriving segment of our local economy. Citizens Bank is committed to helping maintain the success of farming in our area. Anyone wanting a loan for the purpose of land purchase, crop production, equipment, livestock, etc.

Comments:

- *Crop production loans, farm equipment purchases, or loans to purchase livestock.*
- *Monthly payment or seasonal payment arrangements are available.*
- *Various fees may be assessed according to the type of collateral and terms.*

[Get Started](#)

7 – Business Banking Services

Online & Mobile Banking



Get ready for speed and convenience at your fingertips. With several different ways to bank, you now have your own personal Citizens Bank branch in the palm of your hands.

Compare the different mobile options and choose what is right for you!

	Mobile App	Mobile Web	Text Banking
Free! Carrier Data Charges May Apply	✓	✓	✓
Account Activity	✓	✓	✓
Transfers between eligible Citizens Bank Accounts	✓	✓	
Bill Pay and P2P (person to person) payments	✓	✓	
Mobile Deposit with the camera feature on your device	✓		
Locations of branches and free ATM's near you	✓	✓	
Help	✓	✓	✓
Security including device authentication and auto-signoff	✓	✓	



Let's Get Building...

Our home loan experts are here to help you make informed decisions whether you are planning to buy, build, update, or refinance your home.

[See Construction Loans >>](#)
[View All Mortgage Loans >>](#)



Wondering How Much You Can Afford?

We have a variety of calculators to help you with your financial planning. Here are just a few:

- [Mortgage Loan](#)
- [Mortgage Tax Savings](#)
- [Rent vs Buy](#)
- [Bi-Weekly Payment](#)

[View All Calculators](#)

Business Checking

Features to Meet Your Needs. Accounts to Match Your Goals.						
	Advisor Checking	Manager Checking	President Checking	Director Checking	Government Checking	Community Checking
Designed For:	Small Business	Medium Business	Any Business	Large Business	Public Funds	Civic Organizations
Monthly Service Fee	No	\$5.00 Maintain a minimum balance of \$5,000 and the fee is waived	\$10.00 Maintain a minimum balance of \$10,000 and the fee is waived	\$15.00 Monthly Fee plus \$0.50 per item deposited charge and \$0.10 per check charge	\$15.00 Monthly Fee plus \$0.50 per item deposited charge and \$0.10 per check charge	No
Business Debit Card	Yes	Yes	Yes	Yes	Yes	Yes
Free Transactions (Paper and Electronic) Transactions over Free level: \$0.20 each	100	250	250	No	No	100
Online and Mobile Banking	Yes	Yes	Yes	Yes	Yes	Yes
Saver Business Bundle	Unlimited Mobile Deposit and Limited BillPay (5) \$3.95*	Unlimited Mobile Deposit and Limited BillPay (5) \$3.95*	Unlimited Mobile Deposit and Limited BillPay (5) \$3.95*	Not Available	Not Available	Unlimited Mobile Deposit and Limited BillPay (5) \$3.95*
Power Business Bundle (PBB)**	ACH, Wire, Unlimited BillPay, Unlimited Mobile Deposit, \$8.95	ACH, Wire, Unlimited BillPay, Unlimited Mobile Deposit, \$8.95	ACH, Wire, Unlimited BillPay, Unlimited Mobile Deposit, \$8.95	Not Available	Not Available	ACH, Wire, Unlimited BillPay, Unlimited Mobile Deposit, \$8.95
Business Club**	Not Available	PBB Plus Positive Pay Account Reconciliation \$10.95	PBB Plus Positive Pay Account Reconciliation \$10.95	Not Available	Not Available	PBB Plus Positive Pay Account Reconciliation \$10.95
Available***	Not Available	Remote Deposit Capture, Smart Pay	Remote Deposit Capture, Smart Pay	Remote Deposit Capture Smart Pay, ACH, Wire, BillPay, Mobile Deposit, Positive Pay and Account Reconciliation	Remote Deposit Capture Smart Pay, ACH, Wire, BillPay, Mobile Deposit, Positive Pay and Account Reconciliation	Remote Deposit Capture, Smart Pay
Interest	No	No	Yes	No: Provides Earnings Credit	Yes plus Custom Earnings Credit	No
eStatement (Paper Statement fee: \$4.00/month)	Yes	Yes	Yes	Yes	Yes	Yes
Overdraft Protection Available	Yes	Yes or Line of Credit Available	Yes or Line of Credit Available	No Line of Credit Available	No	No
Dedicated Loan Deposit and Card Representative	Available	Yes	Yes	Yes	Yes	Available



01-08 07/2021

* \$0.50 Over Limit
** ACH and Wire have additional fees
*** Standard fees apply per service

866-666-2195 | WWW.CITIZENS-BANK.ORG



Think Small Business with...

Advisor Checking

Our Advisor Checking account is designed specifically for business with lower transaction activity - plus, it give you all the features and benefits of a commercial checking account without the expense.

FEATURES

- Business Debit Mastercard¹
- Online Banking
- Get 100 combined paper and electronic transactions²
- Mobile Banking
- 24/7 on-demand eStatement³
- Overdraft Privilege Protection available
- No Monthly Service Fee
- Bundle Options available
- Only \$25 Deposit to Open

View more information about our Advisor Checking [here](#).



Think Medium Business with...

Manager Checking

Our Manager Checking account is specifically for businesses with moderate transaction activity. This account includes more included transactions than our Advisor account and a dedicated loan, deposit and cards services representative.

FEATURES

- Business Debit Mastercard¹
- Online Banking
- Get 250 combined paper and electronic transactions²
- Dedicated Loan and Deposit Specialist
- Card Services Representative
- Mobile Banking
- 24/7 on-demand eStatement³
- Overdraft Privilege Protection available
- Lines of Credit available
- Minimum balance of \$5,000 to avoid monthly service fee of \$5.00
- Bundle Options available
- Only \$25 Deposit to Open

View more information about our Manager Checking [here](#).



Think Interest with...

President Checking

If you have a higher volume of transactions and are looking for interest, our President Checking account is the best option. This account includes all the transactions and a dedicated loan, deposit and card services representative as our Manager Checking with the interest!

FEATURES

- Business Debit Mastercard¹
- Online Banking
- Get 250 combined paper and electronic transactions²
- Dedicated Loan and Deposit Specialist
- Card Services Representative
- Mobile Banking
- 24/7 on-demand eStatement³

- Overdraft Privilege Protection available
- Lines of Credit available
- Minimum balance of \$10,000 to avoid monthly service fee of \$10.00
- Pays Interest
- Bundle Options available
- Only \$25 Deposit to Open

View more information about our President Checking [here](#).



Think Large Business with...

Director Checking

If your business has a higher volume of transactions, our Director Checking account allows you to offset monthly fees with an earnings credit on balances kept in your account. This account includes a dedicated loan, deposit and card services representative.

FEATURES

- Business Debit Mastercard¹
- Online Banking
- Dedicated Loan and Deposit Specialist
- Card Services Representative
- Mobile Banking
- 24/7 on-demand eStatement³
- Lines of Credit available
- Analysis of Charges with an Earnings Credit
- \$15.00 Monthly Service Fee plus \$0.05 per item deposited charge and \$0.10 per check charge.
- Cash Management Solutions available
- Only \$25 Deposit to Open

Call or visit your nearest branch and let us customize a Director Checking account that suits your needs.

View more information about our Director Checking [here](#).



Think Public Entities with...

Government Checking

If your city, county, or state agency has a higher volume of transactions, our Government Checking account allows you to offset monthly fees with an earnings credit on balances

kept in your account. This account includes a dedicated business representative to help you navigate the right services to fit your needs.

FEATURES

- Business Debit Mastercard¹
- Online Banking
- Business Service Representative
- Mobile Banking
- 24/7 on-demand eStatement³
- Analysis of Charges with an Earnings Credit
- \$15.00 Monthly Service Fee plus \$0.05 per item deposited charge and \$0.10 per check charge.
- Cash Management Solutions available
- Only \$25 Deposit to Open

Call or visit your nearest branch and let us customize a Government Checking account that suits your needs.

View more information about our Government Checking [here](#).



Think Civic Organizations with...

Community Checking

Our Community Checking account is designed specifically for community organizations like clubs, teams and other non-profit organizations who have lower transaction activity - plus, it gives you all the features and benefits of a commercial checking account without the expense.

FEATURES

- Business Debit Mastercard¹
- Online Banking
- Get 100 combined paper and electronic transactions²
- Mobile Banking
- 24/7 on-demand eStatement³
- No Monthly Service Fee
- Bundle Options available
- Only \$25 Deposit to Open

View more information about our Community Checking [here](#).



Add These Business Services with...

Bundle Options

Speed up your business with an additional bundle option. The following bundle options are available for business accounts:

SAVER BUSINESS BUNDLE - \$3.95 Per Month

- Unlimited Mobile Deposit - Mobile check deposit allows you to save time by depositing your checks remotely, no matter where you are or what time of day it is. Instead of making a run to the bank, you can simply snap a picture of the front and back of the check on your smartphone and deposit it using the bank's mobile app.
- Limited BillPay⁴ - Pay your business bills quickly and easily online. Simplify your accounts payable. Vendors receive a bank deposit or check in the mail. Five BillPay transactions allowed per month.

POWER BUSINESS BUNDLE - \$8.95 Per Month

- ACH⁵ - Fast, secure automated clearing house (ACH) payment solutions so you can more easily manage payroll, vendor payments, and more.
- Wire⁵ - Move money fast so you can get back to business. Our wire transfer services help you quickly move funds across the country or around the world.
- Unlimited BillPay - Same as the Saver Business Bundle, but Unlimited!
- Unlimited Mobile Deposit - Same as the Saver Business Bundle.

BUSINESS CLUB - \$10.95 Per Month

- Includes all the features of the Power Business Bundle plus...
- Positive Pay - Positive Pay detects fraudulent checks at the point of presentation and prevents them from being paid.
- Account Reconciliation - Provides us with a file of checks issued and we will reconcile your payments to your account.

See a bank representative for our Business Fee Schedule.

1. Replacement card fee may apply. See bank for details.
2. Fee for transactions over 100, \$0.20 per transaction.
3. Paper statement fee \$4.00 per month.
4. \$0.50 fee per BillPay transaction over 5 per month.
5. ACH and Wire transaction fee apply, see business fee schedule above for more information.

Business Savings

Regular Savings

Regular Savings is an interest bearing account.

Minimum Deposit to Open: \$10

Withdrawals Allowed: 6 per month

Service Charge: \$2 fee after 18 w/d per quarter, \$5 fee if balance falls under \$300 w/2 years no activity

Comments:

- Transaction limitations are as follows: You may make 6 withdrawals from account each month. A fee of \$2 will be assessed when more than 18 withdrawals during the statement cycle (quarterly).

[Get Started](#)

Business Cash Management

We offer a complete set of cash management solutions designed to optimize your overall financial performance by giving you great control over your business costs, managing risk, improving cash flow and simplifying accounting. Whether you are a large corporation or small business, an organization, government, religious, or civic group, we have options that will meet virtually any type of banking need you may have.

Linked Accounts

- In the event of an overdraft, funds would automatically be transferred from a checking, savings or a loan account.
- Transfers are made in a predetermined increment for a small fee.
- Customers must sign up for this service.

Business Online Banking

- Transfers can be completed between linked accounts.
- Secure and limit access by account.
- QuickBooks download.
- Access to bill payment, mobile deposit, ACH, and wire transfer functions. Fees apply.

Bill Payment

- Must have online banking account.
- Fast and convenient method to pay bills.
- Must be enrolled and pay processing fees to access.
- Electronic payments generally received in 3 to 5 business days.
- Check payments generally received in 5 to 7 business days.
- Cut off is noon central for today's processing.
- Bills can be scheduled as recurring.

Mobile Banking

- Must have online banking account.
- App available for Android and Apple.
- Ease and convenience of on the go access to your funds.
- Transfers can be completed between linked accounts.

Mobile Deposit

- Must have online banking account.
- Must be enrolled to access.
- Must qualify for overdraft protection.
- Daily deposit of up to \$10,000.
- Processing fees apply.
- Same day credit if deposited before 2pm central. *(checks over \$2,000.00 require bank approval and may result in next day credit)*

ACH Origination Services

Allows your company to submit direct deposit payroll along with electronic payments to other parties.

- Must be enrolled in online banking with Cash Management services.
- Processing Fees apply.
- File transmission deadlines apply.

Wire Transfer Services

Wire transfer is a quick and easy way to send funds to another person or company.

- Must be enrolled in online banking with Cash Management services and be approved for wire services.
- Processing Fees apply.
- File transmission deadlines apply.

Remote Deposit Capture

Remote Deposit Capture allows you to submit checks for deposit remotely. You will have a check scanner and a secure application at your location allowing authorized employees to remain at the once to make bank deposits.

- Secure website for remote access.
- Must be pre-approved for Remote Deposit services.
- Processing Fees apply.
- File transmission deadlines apply.

Positive Pay

Positive pay validates each check that clears against a file that the company submits to the bank through online banking thereby reducing fraud against the company. It will only allow checks to be cashed that the company authorizes through a positive pay file.

- Must be enrolled in online banking with Cash Management services.
- Processing Fees apply.

ACH Debit Block/Filters

ACH blocking/filtering allows certain ACH debits/and or credits to post to your account, while excluding other debits and/or credits. You let us know which ACH transactions should be allowed to post to your company's checking account and the block or filter will be set up based on your parameters.

- Saves time, money and reduces the risk of fraud.
- No more worry about having to manage unauthorized transactions that have posted to your company's checking account.
- You control the list of permitted ACH transactions to your company's checking account.

Account Reconciliation

Provide us with a file of checks issued, and we will reconcile your payments to your account. Receive a listing of all checks paid during the statement period. Reports include check numbers, paid dates and dollar amounts, and total number of paid checks. Processing fees apply.

Sweep Account

Automate transferring of funds between an operating account, investment account and line of credit.

- Must be pre-approved.
- Thresholds set for each account (*minimum, maximum*).
- Processing Fees apply.

SmartPay Express

Give your small business, nonprofit or other organization power to allow customers, donors, renters or other payers to make payments to your account. These payments can be one-time or recurring transactions. The SmartPay portal provides you a unique secure URL address that is linked to your website with your own branded web address and microsite for customers to access. Robust reporting tools allow you to study customer data, generate transactions and view current or historical reports.

- PCI DSS secured compliance.
- Customers can pay you anytime, anywhere.
- Easy setup and real time/historical reporting.
- Transaction research/editing.
- Export data to accounting systems.

Download our Cash Management [brochure](#).

[Contact Us](#) today to find out more about these valuable services.

Business Debit Cards

No More Waiting With Card@Once

No one likes to wait, especially when it comes to accessing funds from your newly opened account. But account holders are often asked to wait for up to 10 days to receive their new or replacement debit card and PIN in the mail.

With Citizens Bank's Card@Once, the wait is over! Card@Once is a comprehensive solution that enables our friendly staff to create and distribute fully functioning, personalized debit cards onsite in ten of our nineteen branch locations.

Which Card Is Right For You?

With a new Citizens Bank business checking account, you have several options regarding a new "chip-enabled" Debit MasterCard. Our Business Debit Card makes it faster and easier to make everyday purchases without the hassle of carrying cash or checks.

The Business Card carries a daily usage limit of \$2000 which helps make it easier to make purchases for your small business. It also allows you to have quick access to cash at one of our convenient ATM Locations.

Your new card features an embedded chip that improves security every time you make a purchase at a chip-enabled terminal. The chip technology creates a unique code for each transaction that is difficult to duplicate, reducing the risk of fraudulent charges on your account.

Business Debit

Don't want a specific program, but still want the convenience of a debit card? Do you just need the convenience of a debit card to easily keep track of your business flow? You can make purchases in person, online or by phone using your new Business Debit MasterCard. Debit MasterCard is accepted at millions of locations worldwide.

If you have any questions please contact us toll free at 1-866-666-2195.



Real Time Debit/ATM Processing

Real Time processing allows Citizens Bank the ability to post transactions to your account within seconds after they occur.

How does Real Time processing benefit you?

- "Real Time" immediate access to deposited funds with your ATM/Debit Card
- "Real Time" immediate posting of your ATM/Debit card transactions
- "Real Time" immediate balance updates at ATM Terminals

Visit our [Real Time Processing](#) page for more information.

Benefits for Debit MasterCard® (enhanced)

1. Automated Biller Update (ABU) helps to update card information for recurring payments.
2. Zero Liability**
3. Protects your cardholders against unauthorized purchases on your card should your card be lost or stolen. Emergency Card Replacement*
4. Emergency Cash Advance*
5. Lost/Stolen Card Reporting*
6. Shopper Benefits *
7. Extended Warranty – Doubles the time period and duplicates the coverage of the original manufacturer's or U.S. store brand warranty on new products for a maximum of one year.
8. Price Protection - Guarantees cardholders the best price on new products purchased with an eligible card by providing a refund on the difference, if you find a lower price within 60 days of purchase.
9. Satisfaction Guarantee - Provides up to \$250 per new product, if your cardholders become dissatisfied with their product within 60 days of purchase and the merchant will not accept a return.

* Certain restrictions, terms, and conditions apply. Contact 1-800-MasterCard for full details.

** Certain restrictions apply. Please [click here](#) for more details.

Business Credit Cards

Choosing the right credit card is easier than ever. Whether you want to pay down balances faster, maximize cash back, earn rewards or begin building your credit history, we have the ideal card for you!

No matter which card you choose, you'll enjoy important features like:

- Convenient and Flexible Purchasing Power. Accepted at millions of locations worldwide.
- Mobile purchasing capability for added convenience.
- Zero Fraud Liability.* You won't be liable for fraudulent purchases when your card is lost or stolen.
- Cardmember Service available 24 hours a day/365 days per year.
- Plus much more!

[**APPLY NOW**](#)

Credit Card Member Services

Already a Citizens Bank credit card member? Click below to view your "My Account Access" to view your credit card statements, make payments, view your rewards, etc.
One link for all your credit card services!

[**My Account Services Log In**](#)

Business Overdraft Privilege

When it comes to managing money in your checking account, we know mistakes can happen. Citizens Bank offers an Overdraft Privilege Service (ODP). If your account qualifies for Overdraft Privilege, we will consider without obligation on our part, striving to pay items for which your account has insufficient or unavailable funds, instead of returning those items unpaid. Your transactions will be honored until your account exceeds ODP limits.

What You Need to Know About Overdrafts and Overdraft Fees

An overdraft occurs when you do not have enough money in your account to cover a transaction, but we pay it anyway. We can cover your overdrafts in two different ways:

1. We have standard overdraft practices that come with your account.
2. We also offer overdraft protection plans, such as Overdraft Privilege, Linked Account, and an Overdraft Line of Credit.

What are the standard overdraft practices that come with my account?

We do authorize and pay overdrafts for the following types of transactions:

- Checks and other transactions made using your checking account number
- Automatic reoccurring bill payments

We do not authorize and pay overdrafts for the following type of transaction unless you ask us to and opt in:

- ATM transactions
- Everyday debit card transactions

We pay overdrafts at our discretion, which means we do not guarantee that we will always authorize and pay any type of transaction.

If we do not authorize and pay an overdraft, or if you have opted out, your transaction will be declined.

What fees will I be charged if Citizens Bank pays my overdraft?

Under our standard overdraft practices:

- We will charge you a fee of up to \$28 each time we pay an overdraft.
- There is no limit on the total fees we can charge you for overdrawing your account.
-

What if I want Citizens Bank to authorize and pay overdrafts on my ATM and everyday debit card transactions?

If you also want us to authorize and pay overdrafts on ATM and everyday debit card transactions, you may opt in to this service by clicking below, by calling (866) 666-2195, or by visiting one of our branches.

[Opt In Now](#)

If you do not use Overdraft Privilege Service, it costs you NOTHING! Overdrafts are due and payable immediately. Please be aware that the payment of items is not a guarantee. The payment of items presented today does not guarantee that future items present will be paid. All items whether paid or returned are subject to a \$28 overdraft or non-sufficient fund fee.

Checking accountholders may opt out of all overdraft coverage at any time. Opting out of the Overdraft Privilege service may mean that items presented will be returned and a \$28 non-sufficient funds fee will be charged.

Deminimus Amount:

Our deminimus amount is \$5.00. There will be no fee for items which overdraw an account up to, but not exceeding, \$5.00 on any business day.

For more information on any of our Overdraft Services, please see our Overdraft Privilege Disclosure below.

[Overdraft Privilege Disclosure](#)

Business Services

ATMs

For your convenience, access your business account information 24 hours a day – 7 days a week. Make deposits, withdrawals, check account balances and transfer funds. We now offer surcharge-free ATMs. The MoneyPass network offers thousands of surcharge-free ATMs coast to coast located where you live, work and travel. This locator will help you find the most convenient ATM location to use your MoneyPass card surcharge-free.

Visit www.moneypass.com to find out more.

Business Debit Card

Our MASTERCARD debit card makes it faster and easier to make purchases in person, online, or by phone. If you need cash, our debit card also serves as an ATM card. We also offer a free business debit card for business customers. To Report a Lost or Stolen Debit Card after hours please call 1-800-264-5578 and they will be happy to assist you.

Cash Management

Cash Management is a product available to Commercial customers that streamlines your businesses cash flow. Services include viewing transactions to your account, transfer of funds, account receivable payments, and much more.

Visit our [Cash Management](#) page for more details.

Cashier Checks

Cashier checks can be purchased at any of our branches. We can check on the status of these checks.

Image Statements

Reviewing and filing your statements has never been easier. Each month we'll send you reduced images of your checks numerically and we also provide a three-ring binder for easier filing.

Intuit QuickBooks & Quicken

If your business uses either Intuit QuickBooks or Quicken, Citizens Bank has direct access to export your account information into either of these programs. For Intuit software user guides, click [here](#).

Linked Accounts

Linked Accounts allow you to authorize us to automatically transfer funds from one account to another for a minimal fee of \$3.00 when balances fall into the negative. These transfers can be made from another checking account or a savings account (restrictions apply to savings). Linked Accounts allow you to take charge of your finances and limit overdraft or NSF fees at the same time.

Merchant Capture

Imagine processing your business bank deposit without leaving your desk! Our Merchant Capture product allows you the convenience to do just that.

Merchant Card Services

Increase your revenue opportunities with Merchant Card Services. Acceptance of Debit/Credit card processing provides purchasing convenience to your customers and at the same time boosts your sales. Electronic terminals, PC software, Smart phones or Touch-tone phone processing are the many ways that are available to process these transactions at a very affordable rate.

Mobile App

Our mobile app is available from the App Store and Google Play store, and they are free to any customer with a checking, savings, or loan account. Please visit [Online & Mobile Banking](#) to find out more.

Mobile Check Deposit

Deposit checks into your account without ever visiting a branch. It is as easy as taking a picture. Please visit [Online & Mobile Banking](#) for more information and to get approved.

Night Depository

Unable to make it to the bank during business hours? Use our convenient night deposit box to secure your banking transactions. All transactions dropped off after business hours are processed at the beginning of the next business day.

Overdraft Privilege

Our overdraft privilege is designed to automatically assist you when you may inadvertently or have the occasional need to overdraw your checking account. This service allows the insufficient checks to be paid, charging you our normal overdraft fee of \$28, without the worry of embarrassment and another return check charge from the retailer.

Notary Service

This service is available at no charge to our customers.

Safe Deposit Box

We offer several sizes of safe deposit boxes at many of our locations. Please contact your local branch for sizes and availability.

Sweep Services

Sweep Services allows you to authorize us to automatically sweep funds from one account to another for a minimal fee of \$3.00 when balances fall below a certain threshold. These

transfers can be made from another checking account or a savings account (restrictions apply to savings). Sweep Services allows you to take charge of your finances and limit your fees at the same time.

Telephone Banking

This 24-hour service enables you to access your personal account information using any touch tone phone 24 hours a day, 365 days a year. With phone banking, you may perform the following functions: Get current balance information, Gather information on your loan accounts, or Review recent transactions. To use this service simply call toll free at 1-800-318-5540.

Wire Transfers

Wire transfers are a quick and easy way to transfer money from one bank to another. Citizens Bank originates and receives both domestic and international wires.

For questions regarding account services and fees, please visit your local branch.

Business Real Time Processing

Real-Time Debit Card Transaction Processing

Citizens Bank processes all debit card account transactions and deposits in real time. With real-time processing, your account will automatically be updated whenever a transaction is processed with your Citizens Bank debit card. Whether you use your debit card every two minutes or every two hours, you'll appreciate having the most up-to-date account information available. This information is immediately accessible with your Citizens Bank smartphone app or eBanking account.

How it Works

When you swipe your card at a business, an authorization will take place immediately. This initial authorization will appear right away on your account and be visible to you through eBanking. Once the business closes their debit card transactions and sends them for processing, the actual transaction will post to your account. Depending on when a business processes their activity, a transaction could be pending for 1 day or 3 days.

Debit Card Authorization Vs. Posted Transaction

The initial authorization and the actual posted transaction may differ in amounts, depending on where you use your debit card. The following are a few examples of when the authorization and actual transaction may be different:

- Pay-at-the-pump gas station authorizations will always be different than the actual amount that posts to your account. Gas stations don't know how much your total fuel purchase will be until it is completed. The authorization amount will verify the validity of the card and the actual transaction that's posted to your account will be for the amount of your fuel purchase.
- Restaurants often authorize the transaction for 20% more than your bill. They will then adjust your transaction to correctly reflect the tip amount. This will be the amount that posts to your account.
- Hotels usually authorize for amounts greater than the agreed-upon amount to cover any incidentals or extra charges. At the end of your stay, the actual charges will be processed and posted to your account.

Checks & Deposits

Any check you cash or deposit at a Citizens Bank branch will reflect your available balance within seconds. These items will then process and post to your account during the business day on which they were received. If you cash a check at another bank or write a check to a merchant, we will post it to your account on the business day on which we receive it.

Enhanced Security

Real-time processing will also help further protect your account from potential fraud. With automatic updates to your account balance, you'll be able to view all your account transactions right away. If you notice any suspicious activity on your account, report it immediately to Citizens Bank.

Contact Us

Please visit our [Contact Us](#) page, or feel free to call us at 866-666-2195 if you have any questions regarding real-time processing. We appreciate your business and look forward to providing continued service enhancements as we help you with all your financial needs.

Commercial & Business Loans

Citizens Bank offers a number of different loan products specifically designed to meet the needs of your business. Suitable for any Corporation, LLC, Partnership, Sole Proprietorship, Governmental Entity, Church, or Small Business.

Comments:

- *Loans may be used for purchasing of new/used equipment, business expansion costs, purchase of commercial real estate, working capital to help you with day-to-day operations, capital expenditures to enhance the long-term viability of your small business, and many other business purposes.*
- *These loans are granted on the basis of a customer's financial history but collateral may be required.*
- *Loans available are fixed or variable (ARM) depending on borrower's needs.*
- *Various fees may be assessed according to the type of collateral and terms.*
-

[**Get Started**](#)

Mortgages

Adjustable Rate Mortgage

If you want to finance your personal dwelling and you are going to live or own that dwelling for 3-5 years, this is your loan.

Comments:

- *Low closing costs and comfort of dealing with a hometown bank.*
- *No Points.*
- *Rates are adjusted on three and five year intervals.*
- *Lifetime cap on primary residence mortgage loans.*
- *Long-term amortization periods available.*
- *Typically low fees.*

[**Get Started**](#)

Conventional Fixed Rate Mortgage

If you are ready to buy your dream home or refinance your current one, this is the right loan for you.

Comments:

- *Low, competitive rates and affordable payments.*
- *Friendly service and decisions made by local people you know and trust.*
- *Fixed rate and monthly payment for the life of your loan.*
- *Easier to budget and plan for.*

[Get Started](#)

Freedom Line of Credit

Anyone who owns any type of real estate and has equity in that real estate.

Comments:

- *Freedom to use money for whatever your needs might be.*
- *Secured by 1st or 2nd mortgage on most any real estate, including primary residence, 2nd homes, rental homes, farm land, & commercial property.*
- *Five or ten year repayment with interest only payments monthly.*
- *Please note that a balloon payment may result and the offer is subject to credit approval.*

[Get Started](#)

To see what you can afford, visit our [Calculator](#) page, and click on "Mortgage".

Construction

Are you wanting to build that dream home or perfect business? Building a new home or business could be one of the most exciting and rewarding projects you'll ever undertake. Citizens Bank offers a number of construction loans designed to help you finance the building of your new home.

Comments:

- *Interest payments calculated on advances made and not the total loan commitment.*
- *Various fees may be assessed according to the type of collateral and terms.*
- *\$300 Construction Appraisal with or without permanent financing.*

[Get Started](#)

Agriculture

Agriculture has long been a thriving segment of our local economy. Citizens Bank is committed to helping maintain the success of farming in our area. Anyone wanting a loan for the purpose of land purchase, crop production, equipment, livestock, etc.

Comments:

- *Crop production loans, farm equipment purchases, or loans to purchase livestock.*
- *Monthly payment or seasonal payment arrangements are available.*
- *Various fees may be assessed according to the type of collateral and terms.*

[Get Started](#)

SCHEDULE OF FEES



CITIZENS BANK

BANK OF CELINA • LIBERTY STATE BANK
SMITH COUNTY BANK • TRADERS BANK
AMERICAN BANK & TRUST

Cashier's Check Fee	\$	2.00	per item
Check Cashing Fee - Non Customer		n/a	do not cash for non customers
Check Printing Fee	\$	0.25	per temporary check encoded
Check Reorder Fee		yes	varies by style
Counter Check	\$	2.00	per page
Christmas Club Early Withdrawal Fee	\$	10.00	per withdrawal
Collection-Foreign Check	\$	25.00	per item
Checks on Canadian Banks - Non Collection	\$	1.00	per item
Debit/ATM Foreign ATM Fee	\$	1.00	bank customer
Debit/ATM Replacement Fee	\$	10.00	for lost card
Debit/ATM Withdrawal Limits*	\$	500.00	per day (*Smart Start Checking is \$300)
Debit Card Purchasing Limits			
Consumer Debit Card*	\$	1,500.00	per day (*Smart Start Checking is \$800)
Business Debit Card	\$	2,000.00	per day
Deposit Item Returned	\$	10.00	per item
Dormant Fee	\$	5.00	per statement cycle
Executions, Garnishment, Levies, Escheat	\$	75.00	
Foreign Currency - Buy/Sell	\$	10.00	
IRA Closure		no charge	
Mobile Deposit Limit	\$	1,500.00	per day (initial approval required)
Money Market Checking Excessive Withdrawal	\$	5.00	per transaction over 6/month
Night Deposit Bags (Locking)	\$	35.00	per bag
Overdraft Fee	\$	29.50	per item; \$177 daily max
Overdraft Fee ODP	\$	29.50	per item
Overdraft Return Fee	\$	15.00	per item
Overdraft Transfer Fee-Linked Account	\$	3.00	per day
Photocopies	\$	0.25	per page-black and white
Records Request			
Research	\$	25.00	per hour-1 hour minimum
Statement Reproduction	\$	5.00	per monthly statement
Fax	\$	5.00	per fax
Document E-mail (encrypted)	\$	1.00	per e-mail
Savings Account Withdrawal	\$	2.00	per transaction over 18 per quarter
Safe Deposit Box Drilling	\$	250.00	
Safe Deposit Box Late Fee	\$	10.00	per month
Safe Deposit Box Rentals			
Size 2x4	\$	15.00	annual fee
3x5	\$	18.00	annual fee
5x5	\$	20.00	annual fee
3x10	\$	25.00	annual fee
5x10	\$	35.00	annual fee
10x10	\$	60.00	annual fee
Stop Payment	\$	29.50	per item
Vacation Club Early Withdrawal	\$	10.00	per withdrawal
Wire Fee-Incoming Domestic	\$	9.00	customer only
Wire Fee-Outgoing Domestic	\$	15.00	customer only
Wire Fee-Incoming International	\$	40.00	customer only
Wire Fee-outgoing International	\$	40.00	customer only

PUBLIC DISCLOSURE

December 16, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Bank of Lafayette
Certificate Number: 1711

400 Highway 52 Bypass West
Lafayette, Tennessee 37083

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

600 North Pearl Street, Suite 700
Dallas, Texas 75201

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area (AA), including low- and moderate-income (LMI) neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		
Needs to Improve			X
Substantial Noncompliance			
<i>*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating</i>			

The Lending Test is rated Low Satisfactory.

- Lending levels reflect excellent responsiveness to AA credit needs.
- A high percentage of loans are made in the institution's AAs.
- The geographic distribution of loans reflects adequate penetration throughout the AAs.
- The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business and farm customers of different sizes.
- The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.
- The institution exhibits an adequate record of serving the credit needs of the most economically disadvantaged areas of its AAs, low-income individuals, and very small businesses and farms, consistent with safe and sound banking practices.
- The institution has made an adequate level of community development (CD) loans (CDLs).

The Investment Test is rated High Satisfactory.

- The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits adequate responsiveness to credit and CD needs.
- The institution occasionally uses innovative and/or complex investments to support CD needs.

The Service Test is rated Needs to Improve.

- Delivery systems are accessible to essentially all portions of the institution's AAs.
- The opening and closing of branches has not adversely affected the accessibility of delivery systems, particularly in LMI geographies and individuals.
- Services and business hours do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals.
- The institution provides a poor level of CD services.

DESCRIPTION OF INSTITUTION

Citizens Bank of Lafayette (CBL) maintains its headquarters in Lafayette, Tennessee. Citizens Bancorp Investment, Inc. also headquartered in Lafayette, Tennessee wholly-owns the bank. The holding company owns other non-bank subsidiaries; however, examiners did not consider lending or CD activities from these subsidiaries in this evaluation. CBL received an overall Satisfactory rating at its previous FDIC CRA Evaluation, dated June 22, 2021, based on Interagency Large Institution Examination Procedures.

CBL operates 20 full-service offices in 2 AAs located in the State of Tennessee. On August 20, 2021, CBL merged with their sister-bank, American Bank & Trust of the Cumberlands (ABT) in Livingston, Tennessee. With the ABT merger, CBL acquired three branches. Additionally, CBL closed two branches during the evaluation period.

The primary business focus is on residential and commercial lending, but the bank also offers a variety of loan products including construction, consumer, and agricultural loans. CBL's various deposit offerings consist of consumer and commercial checking, savings accounts, money market accounts, certificates of deposit, as well as debit and credit cards. In addition, the bank offers investment and insurance services. Alternative delivery systems include online banking, remote deposit capture, mobile banking, cash management services, telephone banking, and 19 non-deposit-taking automated teller machines (ATMs).

As of the September 30, 2024, Reports of Condition and Income (Call Report), the bank had total assets of \$1.7 billion, including \$1.1 billion in total loans and \$402.7 million in total securities. Total deposits equaled \$1.4 billion.

The distribution of the loan portfolio is shown in the following table.

Loan Portfolio Distribution as of 9/30/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	168,195	14.8
Secured by Farmland	85,431	7.5
Secured by 1-4 Family Residential Properties	411,247	36.1
Secured by Multifamily (5 or more) Residential Properties	42,086	3.7
Secured by Nonfarm Nonresidential Properties	306,226	26.9
Total Real Estate Loans	1,013,185	89.0
Commercial and Industrial Loans	66,497	5.8
Agricultural Production and Other Loans to Farmers	6,533	0.6
Consumer Loans	44,444	3.9
Obligations of State and Political Subdivisions in the U.S.	7,432	0.6
Other Loans	1,519	0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	40	0.0
Total Loans	1,139,570	100.0
<i>Source: Call Report</i>		

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

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs for which examiners will evaluate its CRA performance. CBL designated two AAs consisting of 12 counties in the Nashville-Davidson-Murfreesboro-Franklin, Tennessee (Nashville) Metropolitan Statistical Area (MSA) and the non-MSA areas of Tennessee. The AAs conform to the technical requirements of the CRA. The following table provides details regarding the composition of each AA. Refer to the individual AAs for additional information.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Nashville MSA	Macon, Smith, Sumner, and Wilson	21	9
Tennessee Non-MSA	Bedford, Clay, Coffee, DeKalb, Franklin, Jackson, Overton, and Putnam	74	13
<i>Source: Bank data</i>			

SCOPE OF EVALUATION

General Information

This evaluation covers the time period from the previous evaluation dated June 22, 2021, to the current evaluation dated December 16, 2024. To assess performance, examiners applied Large Institution CRA Examination Procedures, which include the Lending, Investment, and Service Tests. The appendix lists each tests' criteria.

Examiners applied full-scope procedures to both the Nashville MSA AA and the Tennessee Non-MSA AA, with more weight given to the Tennessee Non-MSA AA after considering the loan, deposit, and branching activity listed in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Nashville MSA	169,510	34.4	508,579	38.4	9	40.9
Tennessee Non-MSA	323,283	65.6	814,725	61.6	13	59.1
Total	492,793	100.0	1,323,304	100.0	22	100.0
<i>Source: Bank data (2022), Home Mortgage Disclosure (HMDA) Loan Application Register (LAR) data (2023), CRA LAR data (2021-2023), and FDIC Summary of Deposits (6/30/2024)</i>						

Activities Reviewed

For the Lending Test, CRA Large Institution procedures require examiners to consider the institution's reported home mortgage, small business, and small farm loans, as well as all reported CDLs originated since the previous evaluation. Consequently, this evaluation considers total loans reported (inside and outside of the assessment areas) either according to HMDA or CRA data collection reporting requirements. However, the bank's reported HMDA data for calendar years 2021 and 2022 were deemed unreliable. Therefore, examiners relied on a sample of 65 home mortgage loans totaling \$10.2 million for 2022 and the reported HMDA LAR data for 2023.

The following lists the universes of applicable products considered in this evaluation.

Home Mortgage Loans

- 2022: 607 loans totaling \$145.1 million
- 2023: 829 loans totaling \$135.2 million

Small Business Loans

- 2021: 1,449 loans totaling \$71.2 million
- 2022: 810 loans totaling \$114.2 million
- 2023: 736 loans totaling \$106.4 million

Small Farm Loans

- 2021: 595 loans totaling \$16.0 million

- 2022: 300 loans totaling \$18.9 million
- 2023: 165 loans totaling \$10.1 million

Community Development Loans:

June 22, 2021, through December 16, 2024: 8 loans totaling \$15.5 million.

Since no trends exist between the different years' data that materially affect applicable conclusions or ratings, this evaluation only presents small business and small farm loan data for 2022, the most recent calendar year for which corresponding aggregate data exists. Home mortgage loan data for 2023 is presented and compared to aggregate data. However, examiners include all available years of each loan category reviewed in the Assessment Area Concentration discussion. This evaluation presents demographic data based on the 2020 Census data and 2022 D&B data.

Examiners considered the universes by dollar volume and number of loans originated or purchased in 2023, as well as management's stated business strategy, to determine the weighting applied to the loan categories reviewed and arrive at applicable conclusions. Therefore, examiners placed most weight on home mortgage loans when drawing conclusions.

While the number and dollar volume of loans are presented, performance is emphasized by the number volume because it is a better indicator of the number of individuals and businesses served.

The scope for the Investment and Service Tests considered CD activities generated since the previous evaluation through December 16, 2024. The Investment Test's scope further encompassed all prior-period qualified investments (QIs) that remain outstanding as of this evaluation's date. Examiners used the book value as of the current evaluation date for all prior period QIs that remained outstanding.

For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings and closings during the evaluation period. The review evaluated retail banking products and services targeted toward LMI individuals or small businesses and tailored to meet specific needs within the AAs.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

CBL achieved a low satisfactory rating regarding the Lending Test. The excellent lending levels, good percentage of loans within the AAs, adequate geographic distribution, good borrower profile, adequate innovative or flexible lending levels, adequate levels of CDLs, and adequate responsiveness to credit needs and support this conclusion. The performance is further supported by the good Lending Test level in the Tennessee Non-MSA AA and the adequate Lending Test level in the Nashville MSA AA.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Excellent performances regarding home mortgage, small business, and small farm lending support this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to AA credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs. For 2023, the bank originated 678 home mortgage loans totaling approximately \$99.9 million in the AAs. CBL captured a 2.4 percent market share of the total number of home mortgage loans and a 1.1 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 10th out of 610 total lenders in the AAs and lands the bank in the top 1.6 percent of lenders reporting such loans in the AAs. The ranking considers the total number and dollar amount of home mortgage loans made by each institution.

Small Business Loans

Small business lending levels reflect excellent responsiveness to AA credit needs. For 2022, the bank originated 605 small business loans totaling approximately \$74.9 million in the AAs. CBL captured a 4.5 percent market share of the total number of small business loans and a 14.9 percent market share of the total dollar volume of small business loans. This volume of activity ranks the bank 7th out of 120 total lenders in the AAs and lands the bank in the top 5.8 percent of lenders reporting such loans in the AAs. The ranking considers the total number and dollar amount of small business loans made by each institution.

Small Farm Loans

Small farm lending levels reflect excellent responsiveness to AA credit needs. For 2022, the bank originated 260 small farm loans totaling approximately \$14.1 million in the AAs. CBL captured a 39.6 percent market share of the total number of small farm loans and a 44.5 percent market share of the total dollar volume of small farm loans. This volume of activity ranks the bank 1st out of 23 total lenders in the AAs and lands the bank in the top 4.3 percent of lenders reporting such loans in the AAs. The ranking considers the total number and dollar amount of small farm loans made by each institution.

Assessment Area Concentration

A high percentage of loans are made in the institution's AAs. As seen in the following table, CBL originated a high percentage of home mortgage, small business, and small farm loans in the AAs.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Home Mortgage										
2022	52	80.0	13	20.0	65	7,567	73.9	2,676	26.1	10,243
2023	678	81.8	151	18.2	829	99,923	73.9	35,287	26.1	135,210
Small Business										
2021	1,194	82.4	255	17.6	1,449	52,039	73.1	19,164	26.9	71,203
2022	605	74.7	205	25.3	810	74,872	65.6	39,319	34.4	114,191
2023	601	81.7	135	18.3	736	85,511	80.3	20,934	19.7	106,445
Small Business Subtotal	2,400	80.1	595	19.9	2,995	212,422	72.8	79,417	27.2	291,839
Small Farm										
2021	522	87.7	73	12.3	595	13,383	83.5	2,648	16.5	16,031
2022	260	86.7	40	13.3	300	14,057	74.3	4,864	25.7	18,921
2023	134	81.2	31	18.8	165	7,911	78.6	2,153	21.4	10,064
Small Farm Subtotal	916	86.4	144	13.6	1,060	35,351	78.5	9,665	21.5	45,016
Source: HMDA LAR data and CRA LAR data Due to rounding, totals may not equal 100.0 percent										

Geographic Distribution

CBL's geographic distribution of loans reflects adequate penetration throughout the AAs. Adequate records in both the Tennessee Non-MSA AA and the Nashville MSA AA support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. This factor only considered loans originated inside the AAs.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered, good penetration among retail customers of different income levels and business and farm customers of different size. The good record in the Tennessee Non-MSA AA outweighed the excellent performance in the Nashville MSA AA to support this conclusion. Examiners considered the loan product types reviewed relative to available comparative data and any performance context issues when arriving at this conclusion. This factor only considered loans originated inside the AAs.

Innovative or Flexible Lending Practices

The institution makes limited use of innovative and flexible lending practices in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices support this conclusion.

The bank receives favorable CRA credit for its willingness to offer a large number and dollar volume of affordable small dollar loans, which are in demand. These loans show responsiveness to credit needs of the community and offer an alternative to reliance on high-cost credit by non-banks. The bank exhibited a willingness to extend small dollar loans within the AAs, which demonstrates adequate responsiveness to community credit needs.

Innovative or Flexible Lending Programs										
Type of Program	2021		2022		2023		2024		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Small Dollar Loans	94	167	637	945	845	1,181	757	1,112	2,333	3,405
<i>Source: Bank data (6/23/2021 – 12/16/2024)</i>										

The following table lists the small dollar loans by assessment area.

Innovative or Flexible Lending Programs										
Assessment Area	2021		2022		2023		2024		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nashville MSA	51	87	401	589	554	758	501	713	1,507	2,147
Tennessee Non-MSA	43	80	236	356	291	423	256	399	826	1,258
Total	94	167	637	945	845	1,181	757	1,112	2,333	3,405
<i>Source: Bank data (6/23/2021 – 12/16/2024)</i>										

Community Development Loans

The institution has made an adequate level of CDLs. The adequate level of originating CDLs and adequate responsiveness to CD needs in the AAs support this conclusion. This performance was further supported by the good level in the Tennessee Non-MSA AA and the poor level in the Nashville MSA AA.

Regarding the overall level of CDLs, the following table shows that, since the previous evaluation the bank granted 8 CDLs totaling \$15.5 million. This level equates to 1.0 percent of average total assets of \$1.5 billion since the previous evaluation and 1.6 percent of average net loans of \$942.1 million for the same period, thereby reflecting adequate levels. These levels reflect a decrease from the 2.2 percent of average assets and a decrease from the 3.6 percent of average net loans reported at the previous evaluation.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	0	0	0	0	1	1,000	0	0	1	1,000
2022	1	616	0	0	2	7,350	3	4,500	6	12,466
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	1	2,000	0	0	1	2,000
Total	1	616	0	0	4	10,350	3	4,500	8	15,466
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>										

CBL exhibits an adequate record of serving the credit needs of the most economically disadvantaged areas of the AAs, including LMI individuals, small businesses, and small farms. The CDLs proved responsive to AA needs given they addressed affordable housing and revitalization or stabilization efforts, which are identified needs throughout the AAs.

The following table lists the CDLs by AA.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nashville MSA	1	616	0	0	0	0	1	2,000	2	2,616
Tennessee Non-MSA	0	0	0	0	3	9,000	2	2,500	5	11,500
Statewide/Regional	0	0	0	0	1	1,350	0	0	1	1,350
Total	1	616	0	0	4	10,350	3	4,500	8	15,466
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>										

The following details the institution's statewide CDL activity.

- ***Economic Development*** – The bank originated a loan to a Community Development Financial Institution focusing efforts to advance economic opportunities and improve the quality of life for LMI individuals and communities through affordable financing by providing commercial lending opportunities, supporting economic development.

INVESTMENT TEST

CBL achieved a high satisfactory rating regarding the Investment Test. The good level of qualified investments and grants and the good responsiveness to CD needs outweighed the adequate use of complex investments in the AAs to support this conclusion. This performance exceeds the adequate records in both the Tennessee Non-MSA AA and the Nashville MSA AA, due to the statewide activities that benefit both AAs.

Investment and Grant Activity

CBL has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

As seen in the following table, CBL made use of 108 QIs and grants totaling \$21.6 million. The total dollar amount of QIs equates to 1.4 percent of average total assets since the previous evaluation and 5.6 percent of average total securities of \$383.6 million for the same period. These ratios represent a decrease from the previous evaluation, at which time QIs represented 2.3 percent of average total assets and 8.8 percent of average total securities.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	7	3,160	0	0	19	6,650	2	1,020	28	10,830
2021	0	0	0	0	0	0	0	0	0	0
2022	3	1,350	0	0	0	0	0	0	3	1,350
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	3	9,379	0	0	3	9,379
Subtotal	10	4,510	0	0	22	16,029	2	1,020	34	21,559
Qualified Grants & Donations	0	0	68	25	5	55	1	0	74	80
Total	10	4,510	68	25	27	16,084	3	1,020	108	21,639
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>										

The following table shows QIs by AA.

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nashville MSA	1	1,220	37	9	0	0	0	0	38	1,229
Tennessee Non-MSA	0	0	31	16	5	55	1	0	37	71
Statewide/Regional	9	3,290	0	0	22	16,029	2	1,020	33	20,339
Total	10	4,510	68	25	27	16,084	3	1,020	108	21,639
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>										

QI activities categorized in the statewide or regional level benefit the institution's designated AAs.

The following lists notable examples of the QIs occurring in the statewide or regional area.

- ***Affordable Housing*** – The bank purchased 3 Tennessee Housing Development Agency (THDA) bonds totaling \$1.4 million during the evaluation period. THDA is a state agency that provides financing for affordable housing to LMI families statewide.

- ***Economic Development*** – The bank purchased 3 Small Business Administration (SBA) Program (SBAP) pool investments totaling approximately \$9.4 million during the evaluation period. These programs provide economic development by supporting small business financial needs and creating jobs for LMI individuals.

Responsiveness to Credit and Community Development Needs

CBL exhibits good responsiveness to credit and CD needs. The prior tables show that CBL's investments benefited affordable housing, revitalization or stabilization efforts, and community services, all of which are identified needs of the AAs. Refer to the individual AA sections for details.

Community Development Initiatives

CBL occasionally uses innovative or complex investments to support CD initiatives. Although investments are responsive to AA needs, many are not particularly innovative or complex. The bank continues to invest in affordable housing initiatives through the THDA and economic development initiatives through SBAP and SBA's Small Business Investment Company Program.

SERVICE TEST

CBL achieved a needs to improve rating regarding the Service Test. The poor levels regarding the CD services outweighed the good accessibility of delivery systems, the good changes in branch locations, and the adequate reasonableness of business hours and services to support this conclusion. This performance is further supported by the poor performance in the Tennessee Non-MSA AA which outweighs the adequate performance in the Nashville MSA AA.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the AAs. The good branch distribution and good alternative delivery systems support this conclusion.

The following table shows that in low-income CTs, the percentage of CBL's branches exceeds the population residing in those areas by 7.0 percentage points, reflecting an adequate level. The table further shows that in moderate-income CTs, the percentage of CBL's branches greatly exceeds the population residing in those areas by 15.4 percentage points, reflecting an excellent level.

Branch and ATM Distribution by Geography Income Level												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	2	2.1	8,366	2.1	2	9.1	2	10.5	0	0.0	0	0.0
Moderate	22	22.9	101,296	25.5	9	40.9	8	42.1	1	33.3	0	0.0
Middle	54	56.3	226,546	56.9	8	36.4	6	31.6	1	33.3	2	100.0
Upper	17	17.7	61,837	15.5	3	13.6	3	15.8	1	33.3	0	0.0
NA	1	1.0	3	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	96	100.0	398,048	100.0	22	100.0	19	100.0	3	100.0	2	100.0
<i>Source: 2020 Census data and Bank data Due to rounding, totals may not equal 100.0 percent</i>												

The alternative delivery systems are accessible to essentially all portions of the AAs. The excellent level of ATMs and the adequate level of other alternative delivery systems support this conclusion.

The level of ATMs in low-income CTs exceeded the population by 8.4 percentage points, reflecting a good level. The level of ATMs in moderate-income CTs exceeds the population by 16.6 percentage points, reflecting an excellent level. Examiners placed more weight on the ATMs in moderate-income CTs as the population is higher, reflecting more opportunities for banking needs in these areas.

Additionally, CBL offers the following alternative delivery systems and services in delivering retail-banking services to all users, including LMI geographies or to LMI individuals throughout all AAs.

Telephone Banking – This system allows customers to obtain deposit account information, transfer funds between accounts, and perform other banking services through a bank staff member.

Online Banking – This service allows customers to conduct banking transactions through a personal computer. Allowable transactions include viewing account information, viewing online statements, viewing cleared checks, fund transfers, loan payments, and electronic bill payment.

Mobile Banking – This product allows customers to access their accounts at anytime and anywhere with a web-enabled phone or with CBL’s mobile app for smartphones. Features include taking a picture of a check using a phone and electronically depositing it to a CBL account, viewing account information, electronic bill payment, push notification alerts, and receiving secure messages.

Remote Deposit Capture – This service allows commercial customers to capture check images using a check scanner to convert checks into electronic transactions for deposit.

Night Depository – This service allows customers to drop off deposits or banking transactions after business hours.

Changes in Branch Locations

To the extent changes have been made, the opening and closing of branches has not adversely affected the accessibility of delivery systems, particularly in LMI geographies and to LMI individuals. As seen in the previous table, CBL opened one branch in a moderate-income CT with the acquisition of ABT. Additionally, CBL did not close any branches in LMI CTs during the evaluation period.

Reasonableness of Business Hours and Services

Services (including where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and individuals. All locations are full-service with no notable differences in product offerings. Banking hours generally reflect the local community needs that they serve and all branches are open for reasonable business hours during weekdays. Most locations offer extended hours on Friday evenings and most are open on Saturday. Refer to each AA for details.

Community Development Services

The institution provides a limited level of CD services. The low level of CD services provided outweighed the adequate responsiveness of CD services to support this conclusion.

The following table shows that the institution provided 36 CD services since the previous evaluation, which reflects a decrease from the 56 CD services provided at the prior evaluation. This number equates to an average of 0.5 CD services per office, per year since the previous evaluation, thereby reflecting a poor level. The bank averaged 21.7 full-service offices for the 3.4 years since the previous evaluation.

The services primarily involve personnel from the institution utilizing their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. CD service activities primarily benefited community services, which is an identified need of the AAs. This reflects adequate responsiveness in addressing a CD of the AA.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	0	5	3	0	8
2022	0	5	3	0	8
2023	0	6	3	0	9
2024	0	8	3	0	11
Total	0	24	12	0	36
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>					

The following table lists the CD services by AA.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Nashville MSA	0	23	8	0	31
Tennessee Non-MSA	0	1	4	0	5
Total	0	24	12	0	36
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs. Therefore, this consideration did not affect the overall rating.

NASHVILLE MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NASHVILLE MSA AA

The Nashville MSA AA consists of all of Macon and Smith counties and portions of Sumner (four CTs) and Wilson (six CTs) counties that are near the bank’s branches. The 22 CTs in the Nashville MSA AA reflect the following income designations based on 2020 Census data: 2 low-, 13 moderate-, and 7 middle-income. The institution operates nine full-service branches throughout this middle-Tennessee AA.

Economic and Demographic Data

The following table notes certain demographic data for the AA.

Demographic Information of the Assessment Area Nashville MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	9.1	59.1	31.8	0.0	0.0
Population by Geography	105,505	7.9	57.4	34.7	0.0	0.0
Housing Units by Geography	42,536	8.1	56.9	35.0	0.0	0.0
Owner-Occupied Units by Geography	26,924	5.8	53.2	41.0	0.0	0.0
Occupied Rental Units by Geography	11,260	14.1	64.2	21.8	0.0	0.0
Vacant Units by Geography	4,352	6.9	61.1	32.0	0.0	0.0
Businesses by Geography	7,922	11.9	58.5	29.6	0.0	0.0
Farms by Geography	445	4.3	47.4	48.3	0.0	0.0
Family Distribution by Income Level	27,594	32.3	19.5	22.4	25.7	0.0
Household Distribution by Income Level	38,184	33.7	19.1	16.7	30.6	0.0
Median Family Income MSA - 34980 Nashville-Davidson-Murfreesboro-Franklin, TN MSA		\$83,085	Median Housing Value			\$173,062
			Median Gross Rent			\$825
			Families Below Poverty Level			12.2%
Source: 2020 Census data and 2022 D&B data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification						

The Federal Financial Institutions Examination Council (FFIEC) publishes annual estimates of median family incomes (MFIs) by area. The FFIEC reported 2022 and 2023 MFIs for the Nashville MSA AA of \$95,600 and \$100,500, respectively. The following table denotes the income ranges for the low-, moderate-, middle-, and upper-income designations.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Nashville-Davidson-Murfreesboro-Franklin, TN MSA Median Family Income (34980)				
2022 (\$95,600)	<\$47,800	\$47,800 to <\$76,480	\$76,480 to <\$114,720	≥\$114,720
2023 (\$100,500)	<\$50,250	\$50,250 to <\$80,400	\$80,400 to <\$120,600	≥\$120,600
Source: FFIEC				

According to Moody's Analytics, as of May 2024, major employers throughout the Nashville MSA AA include Vanderbilt University Medical Center, Nissan North America Inc., HCA Inc. and Vanderbilt University.

The U.S. Bureau of Labor Statistics, as of May 2024, indicates that the unemployment rate for the Nashville MSA was 2.6 percent. The MSA's unemployment rate of 2.6 percent falls below the 3.0 percent rate for the State of Tennessee and the U.S. rate of 4.0 percent. The Nashville MSA

unemployment rates have consistently remained well below that of the State of Tennessee and the U.S. rates for December 2021, December 2022, and December 2023.

Competition

The Nashville MSA AA includes 29 financial institutions operating 116 branches throughout the area. According to the June 30, 2024, FDIC Summary of Deposits data, CBL ranked 7th in deposit market share with 4.4 percent of the AA deposits. The top-ranking institution takes 22.6 percent of the market share. The 2023 peer mortgage data and 2022 peer small business and small farm data indicate there are 528 home mortgage loan reporters, 107 small business-, and 18 small farm-reporting lenders in this AA. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Considering the information from the institution's management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data also showing that 51.8 percent of the area's families are LMI, which suggests a need for CD activities that benefit projects or organizations that provide affordable housing and community services targeted to these families. In addition, 68.2 percent of the area's CTs receiving LMI designations, suggests a need for activities that revitalize or stabilize qualifying geographies.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NASHVILLE MSA AA

LENDING TEST

CBL demonstrated an adequate record in the Nashville MSA AA regarding the Lending test. Excellent lending levels, adequate geographic distribution, excellent borrower profile, good innovative and flexible lending, and poor CD lending support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to the Nashville MSA AA credit needs. Excellent performances regarding home mortgage, small business, and small farm lending in the Nashville MSA AA support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent performance in the Nashville MSA AA. The institution originated 225 mortgage loans totaling approximately \$30.8 million in 2023, capturing a 1.1 percent market share of the total number and 0.5 percent market share of the total dollar volume of home mortgage loans. The activity by number of loans ranks CBL 22nd out of 528 total lenders in the Nashville MSA AA and lands the bank in the top 4.2 percent of lenders reporting such loans in this

AA. This ranking considers the total number and dollar amount of home mortgage loans made by each institution.

Small Business Loans

Small business lending levels reflect excellent performance in the Nashville MSA AA. The institution originated 207 small business loans totaling approximately \$26.0 million in 2022, capturing a 2.6 percent market share of the total number of loans and a 10.0 percent market share of the total dollar volume of small business loans. The activity by number of loans ranks CBL 10th out of 107 reporting lenders in the Nashville MSA AA and lands the bank in the top 9.3 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of small business loans made by each institution.

Small Farm Loans

Small farm lending levels reflect excellent performance in the Nashville MSA AA. The institution originated 141 small farm loans totaling approximately \$8.2 million in 2022, capturing a 42.5 percent market share of the total number of loans and a 49.3 percent market share of the total dollar volume of small farm loans. The activity by number of loans ranks CBL 1st out of 18 reporting lenders in the Nashville MSA AA and lands the bank in the top 5.6 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of small farm loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Nashville MSA AA. Adequate performances regarding home mortgage, small business, and small farm loans support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the Nashville MSA AA. Adequate performances in both LMI geographies support this conclusion.

As seen in the following table, CBL's lending in low-income CTs exceeds aggregate data by 4.9 percentage points, reflecting adequate performance. The institution's lending performance in moderate-income CTs exceeds aggregate data by 1.3 percentage points, reflecting adequate performance.

Geographic Distribution of Home Mortgage Loans Nashville MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	5.8	6.2	25	11.1	2,885	9.3
Moderate	53.2	55.1	127	56.4	15,464	50.2
Middle	41.0	38.8	73	32.4	12,478	40.5
Upper	0.0	0.0	0	0.0	0	0.0
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	225	100.0	30,827	100.0
Source: 2020 Census data, 2023 HMDA Aggregate data, and 2023 HMDA LAR data Due to rounding, totals may not equal 100.0 percent						

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the Nashville MSA AA. Adequate performances in both LMI geographies support this conclusion.

As seen in the following table, the lending in low-income CTs exceeds aggregate data by 3.0 percentage points, exhibiting adequate performance. CBL's lending in moderate-income CTs exceeds aggregate data by 4.5 percentage points, also reflecting adequate performance.

Geographic Distribution of Small Business Loans Nashville MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	11.9	9.6	26	12.6	5,770	22.2
Moderate	58.5	53.0	119	57.5	14,522	55.9
Middle	29.6	37.3	62	29.9	5,686	21.9
Upper	0.0	0.0	0	0.0	0	0.0
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	207	100.0	25,978	100.0
Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent						

Small Farm Loans

The geographic distribution of small farm loans reflects adequate penetration throughout the Nashville MSA AA. Adequate performances in both LMI geographies support this conclusion.

As seen in the following table, the lending in low-income CTs exceeds aggregate data by 2.0 percentage points, exhibiting adequate performance. CBL's lending in moderate-income CTs exceeds aggregate data by 3.8 percentage points, also reflecting adequate performance.

Geographic Distribution of Small Farm Loans Nashville MSA AA						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low	4.3	5.1	10	7.1	1,762	21.5
Moderate	47.4	52.2	79	56.0	3,931	48.1
Middle	48.3	42.7	52	36.9	2,483	30.4
Upper	0.0	0.0	0	0.0	0	0.0
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	141	100.0	8,176	100.0
Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered, excellent penetration among retail customers of different income levels and business customers of different size in the Nashville MSA AA. The excellent performances regarding small business and small farm loans outweighed the good performance regarding home mortgage loans to support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects good penetration among retail customers of different income levels in the Nashville MSA AA. Excellent performance to low-income borrowers and adequate performance to moderate-income borrowers support this conclusion.

As seen in the following table, CBL's lending to low-income borrowers exceeds aggregate data by 14.7 percentage points, reflecting excellent performance. The table further shows that to moderate-income borrowers, CBL's lending is slightly below aggregate data by 4.4 percentage points, reflecting adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Nashville MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	32.3	11.1	58	25.8	3,757	12.2
Moderate	19.5	26.2	49	21.8	5,463	17.7
Middle	22.4	24.9	57	25.3	7,770	25.2
Upper	25.7	20.9	49	21.8	11,557	37.5
Not Available	0.0	16.9	12	5.3	2,280	7.4
Totals	100.0	100.0	225	100.0	30,827	100.0
Source: 2020 Census data, 2023 HMDA Aggregate data, and 2023 HMDA LAR data Due to rounding, totals may not equal 100.0 percent						

Small Business Loans

The distribution of borrowers reflects excellent penetration among businesses of different sizes. The excellent level of lending to businesses with gross annual revenues (GARs) of \$1.0 million or less supports this conclusion.

As reflected in the following table, CBL's distribution of loans to businesses with GARs of \$1.0 million or less significantly exceeds aggregate performance by 20.1 percentage points, reflecting excellent penetration.

Distribution of Small Business Loans by Gross Annual Revenue Category Nashville MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	86.3	61.0	168	81.1	19,099	73.5
>\$1,000,000	3.2	--	14	6.8	5,114	19.7
Revenue Not Available	10.5	--	25	12.1	1,765	6.8
Totals	100.0	100.0	207	100.0	25,978	100.0
<i>Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent</i>						

Small Farm Loans

The distribution of borrowers reflects excellent penetration among farms of different sizes. The excellent level of lending to farms with GARs of \$1.0 million or less supports this conclusion.

As reflected in the following table, CBL's distribution of loans to farms with GARs of \$1.0 million or less exceeds aggregate performance by 12.7 percentage points, reflecting excellent penetration.

Distribution of Small Farm Loans by Gross Annual Revenue Category Nashville MSA AA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	99.6	63.9	108	76.6	6,972	85.3
>\$1,000,000	0.4	--	1	0.7	500	6.1
Revenue Not Available	0.0	--	32	22.7	704	8.6
Totals	100.0	100.0	141	100.0	8,176	100.0
<i>Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent</i>						

Innovative or Flexible Lending Practices

The institution uses innovative and flexible lending practices in order to serve the Nashville MSA AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices support this conclusion.

The bank originated 1,507 small dollar loans totaling \$2.1 million in the Nashville MSA AA. This equates to 63.0 percent of the institution's total small dollar loans. Given the bank's capacity and the needs in the AA, the level of innovative and flexible loans reflects good responsiveness to the credit needs of the AA.

Community Development Loans

The institution has made a low level of CDLs in the Nashville MSA AA. The low level of CDLs and adequate responsiveness to CD needs in this AA support this conclusion.

CBL originated two CDLs totaling \$2.6 million in the Nashville MSA AA. By dollar volume, this equates to 16.9 percent of the institution's total CDLs compared to 34.4 percent of the total loans in this AA. This performance represents a decrease when compared to the prior evaluation, at which time the bank made 11 CDLs totaling \$9.0 million.

The loans support revitalization or stabilization efforts and affordable housing, both of which are identified needs in the area. This shows that the bank is adequately responsive in addressing the needs of the Nashville MSA AA.

Community Development Lending Nashville MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	0	0	0	0	0	0	0	0	0	0
2022	1	616	0	0	0	0	1	2,000	2	2,616
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	0	0	0	0	0	0
Total	1	616	0	0	0	0	1	2,000	2	2,616
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>										

The following points note the CDLs in the Nashville MSA AA.

- ***Affordable Housing*** – A loan was originated to purchase a 1-4 family residence to provide transitional housing to individuals recovering from addiction, providing affordable housing to LMI individuals.
- ***Revitalize or Stabilize*** – A loan received a three-year renewal for a working line of credit for a company that maintains multifamily housing in rural, LMI areas, aiding the retention of the business and residents in an LMI area.

INVESTMENT TEST

CBL demonstrated an adequate record in the Nashville MSA AA regarding the Investment Test. An adequate level of QIs, adequate responsiveness to CD needs, and adequate CD initiatives support this conclusion.

Investment and Grant Activity

The institution has an adequate level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the Nashville MSA AA.

As reflected in the following table, CBL made 38 QIs totaling approximately \$1.2 million in the Nashville MSA AA. By dollar volume, this equates to 5.7 percent of the institution's total QIs as compared to 38.4 percent of the deposits for this area, which seems low; however, examiners considered that 94.0 percent of the total QIs benefited the statewide area, which includes the Nashville MSA AA. Considering this performance context, the level of QIs is adequate. This performance is a decrease from the 1 QI totaling \$1.7 million made at the prior evaluation.

Qualified Investments Nashville MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	1	1,220	0	0	0	0	0	0	1	1,220
2021	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	0	0	0	0	0	0
Subtotal	1	1,220	0	0	0	0	0	0	1	1,220
Qualified Grants & Donations	0	0	37	9	0	0	0	0	37	9
Total	1	1,220	37	9	0	0	0	0	38	1,229
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>										

The following lists notable examples of QIs in the Nashville MSA AA:

- ***Affordable Housing*** – The bank holds a Federal National Mortgage Association bond with a current book value of \$1.2 million that remains outstanding from the prior period. This bond is secured by an apartment complex located in an LMI area with a majority of the units benefitting LMI individuals, providing affordable housing to LMI individuals and families.
- ***Community Service*** – The bank made four donations totaling \$4,000 to a local foundation that helps support the Nashville Ronald McDonald House and Vanderbilt Children's Hospital with housing for families enduring lengthy hospital stays, providing an essential community service to LMI families.

Responsiveness to Credit and Community Development Needs

CBL exhibits adequate responsiveness to credit and CD needs in the Nashville MSA AA. The prior tables show adequate responsiveness based on CBL's investments by dollar amount supporting CD

purposes for affordable housing and community services of the designated area, both identified needs.

Community Development Initiatives

CBL occasionally uses innovative or complex investments to support CD initiatives in the Nashville MSA AA. Refer to the Community Development Initiatives Section at the Institution level for more information.

SERVICE TEST

CBL demonstrated an adequate record in the Nashville MSA AA regarding the Service Test. An adequate level of CD services and adequate distribution of services and hours outweighed the good accessibility of delivery systems to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the Nashville MSA AA. Good branch distribution and good alternative delivery systems support this conclusion.

The following table shows that in low-income CTs, the percentage of the institution's branches exceeds the population residing in those areas by 14.3 percentage points, reflecting an excellent level. In moderate-income CTs, the percentage of CBL's branches rises 9.3 percentage points above the population residing in those areas, which reflects a good level. Examiners placed more weight on performance in moderate-income CTs as the population is higher in these areas, reflecting more opportunities for banking needs.

Branch and ATM Distribution by Geography Income Level Nashville MSA AA												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	2	9.1	8,366	7.9	2	22.2	2	25.0	0	0.0	0	0.0
Moderate	13	59.1	60,523	57.4	6	66.7	5	62.5	0	0.0	0	0.0
Middle	7	31.8	36,616	34.7	1	11.1	1	12.5	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	22	100.0	105,505	100.0	9	100.0	8	100.0	0	100.0	0	100.0
<i>Source: 2020 Census data and Bank data Due to rounding, totals may not equal 100.0 percent</i>												

The institution's alternative delivery systems are accessible to essentially all portions of the Nashville MSA AA. The good level of ATMs outweighed the adequate level of other alternative delivery systems to support this conclusion.

The level of ATMs in low-income CTs exceeded the population by 17.1 percentage points, reflecting an excellent level. The level of ATMs in moderate-income CTs exceeds the population by 5.1 percentage points, reflecting an adequate level.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

No branches were opened or closed in the Nashville MSA AA, therefore, this criteria was not reviewed.

Reasonableness of Business Hours and Services

Services (including where appropriate, business hours) do not vary in a way that inconveniences portions of the Nashville MSA AA, particularly LMI geographies or individuals. The majority of the 9 bank locations in the Nashville MSA AA operate from 8:00 am to 4:00 pm Monday through Thursday. On Friday, the lobbies close one hour later at 5:00 pm and Saturday hours are 8:00 am to noon. However, the Lafayette Public Square branch located on West Locust Street is closed on Wednesdays and the Lebanon Cumberland branch is closed on Saturdays.

Community Development Services

The institution provides an adequate level of CD services in the Nashville MSA AA. The adequate level of CD services and adequate responsiveness to AA needs supports this conclusion.

The following table shows the institution provided 31 CD services since the previous evaluation in the Nashville MSA AA. This level equates to 86.1 percent of all the CD services as compared to 40.9 percent of the branches in this AA. This number also equates to an average of 1.0 CD service per office, per year, thereby reflecting an adequate level. The level of CD services has decreased from the 41 CD services provided at the prior evaluation.

Service activities benefited community services, which is a need of the AA. This demonstrates adequate responsiveness in addressing CD needs in the Nashville MSA AA.

Community Development Services Nashville MSA AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	0	5	2	0	7
2022	0	5	2	0	7
2023	0	6	2	0	8
2024	0	7	2	0	9
Total	0	23	8	0	31
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>					

The following are examples of CD services specific to the Nashville MSA AA:

- **Community Services** – A bank employee serves as chairperson for a non-profit providing services that help LMI individuals and families cope with expenses during a medical crisis.
- **Economic Development** – A bank employee serves as a board member for a county economic development board focused on development of the county by bringing jobs for LMI residents along with facilitating the creation and growth of small businesses.

TENNESSEE NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TENNESSEE NON-MSA AA

The Tennessee Non-MSA AA encompasses the entirety of the following eight counties: Bedford, Clay, Coffee, DeKalb, Franklin, Jackson, Overton, and Putnam. Bedford, Coffee, and Franklin are contiguous, as well as Clay, Dekalb, Jackson, Overton and Putnam; however, they are not contiguous as a whole. The 74 tracts in the Tennessee Non-MSA AA reflect the following income designations based on 2020 Census data: 9 moderate-, 47 middle-, 17 upper-income, and 1 with no income designation. The institution operates 13 full-service branches throughout this middle-Tennessee AA.

Economic and Demographic Data

The following table notes certain demographic data for the AA.

Demographic Information of the Assessment Area Tennessee Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	0.0	12.2	63.5	23.0	1.4
Population by Geography	292,543	0.0	13.9	64.9	21.1	0.0
Housing Units by Geography	128,358	0.0	13.6	65.7	20.7	0.0
Owner-Occupied Units by Geography	77,363	0.0	10.2	67.5	22.3	0.0
Occupied Rental Units by Geography	34,887	0.0	20.5	62.7	16.8	0.0
Vacant Units by Geography	16,108	0.0	14.6	63.8	21.6	0.0
Businesses by Geography	20,350	0.0	14.8	61.7	23.5	0.0
Farms by Geography	1,010	0.0	9.5	69.5	21.0	0.0
Family Distribution by Income Level	74,602	18.9	18.0	20.2	42.9	0.0
Household Distribution by Income Level	112,250	22.8	16.0	17.5	43.8	0.0
Median Family Income Non-MSAs - TN		\$56,418	Median Housing Value			\$154,416
			Median Gross Rent			\$716
			Families Below Poverty Level			12.3%
Source: 2020 Census data and 2022 D&B data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification						

The FFIEC reported 2022 and 2023 MFIs for the Tennessee Non-MSA AA of \$64,700 and \$69,500, respectively. The following table denotes the income ranges for the low-, moderate-, middle-, and upper-income designations.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
TN NA Median Family Income (99999)				
2022 (\$64,700)	<\$32,350	\$32,350 to <\$51,760	\$51,760 to <\$77,640	≥\$77,640
2023 (\$69,500)	<\$34,750	\$34,750 to <\$55,600	\$55,600 to <\$83,400	≥\$83,400
Source: FFIEC				

On December 22, 2022, Federal Emergency Management Agency (FEMA) made a disaster declaration affecting Coffee and Putnam counties due to severe winter storms. On March 1, 2023, and August 7, 2023, FEMA also made disaster declarations affecting Clay and Jackson counties and Coffee County, due to severe storms, straight-line winds, and a tornado, respectively.

In addition, Clay County was deemed underserved throughout the evaluation period with middle-income CT 9551 considered distressed throughout the period. Jackson County reported CTs 9602, 9603, and 9604 as distressed middle-income geographies for 2023 only.

Major employers throughout the Tennessee Non-MSA AA include Northern Illinois University, Crisplant, Inc., Averitt Express, and Nissan Powertrain Assembly.

According to the U.S. Bureau of Labor Statistics, as of May 2024, the unemployment rate for the Tennessee Non-MSA AA was 3.3 percent. The unemployment rate of 3.3 percent for May 2024, rises above the 3.0 percent rate for the State of Tennessee and falls below the U.S. rate of 4.0 percent. This has been fairly consistent with the unemployment rates as of December 2021, December 2022, and December 2023.

Competition

The Tennessee Non-MSA AA includes 29 financial institutions operating 88 branches throughout the area. According to the June 30, 2024, FDIC Summary of Deposits data, CBL ranked 1st in deposit market share with 10.4 percent of AA deposits. The 2023 peer mortgage data and 2022 peer small business and small farm data indicate there are 428 home mortgage loan reporters, 81 small business- and 18 small farm-reporting lenders in this AA. Overall, the competition level allows for lending opportunities.

Community Contact

Examiners contacted a representative of a small business development organization that provides support and guidance to small businesses in the AA. The contact stated that Putnam and DeKalb counties are in a good economic state whereas Jackson, Clay, and Overton counties fall into an at-risk category. The contact noted that Putnam County has an abundance of banking partners and funding resources for business owners and consumers with many funding groups for those with credit issues. The contact stated that housing has become an issue with not enough affordable housing units for starter homes and that this will continue to be an issue as people from other states move into town. The contact continued to state that DeKalb County continues to steadily grow with good funding options; Jackson County has two to three funding sources, but most drive to Putnam County for assistance; Clay County has access to two community banks and Overton County residents have multiple funding sources. Affordable single-family and multi-family housing is one of the greatest needs in the area.

Credit and Community Development Needs and Opportunities

Considering the information from the institution's management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data also showing that 36.9 percent of the area's families are LMI suggest a need for CD activities that benefit projects or organizations that provide affordable housing and community services targeted to these families.

In addition, there are numerous Opportunity Zones located throughout this AA, representing a need for revitalization or stabilization.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE TENNESSEE NON-MSA AA

LENDING TEST

CBL demonstrated a good record in the Tennessee Non-MSA AA regarding the Lending Test. Excellent lending levels, adequate geographic distribution, good borrower profile, the good level of CD lending in this area, and adequate innovative and flexible lending support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to the Tennessee Non-MSA AA credit needs. Excellent performances regarding home mortgage, small business, and small farm lending in the Tennessee Non-MSA AA support this conclusion.

Home Mortgage Loans

The lending activity level reflects excellent performance for home mortgage loans in the Tennessee Non-MSA AA. The institution originated 453 mortgage loans totaling approximately \$69.1 million in 2023, capturing a 3.9 percent market share of the total number and a 2.8 percent market share of the total dollar volume of home mortgage loans. The activity by number of loans ranks the bank 4th out of 428 total lenders in the Tennessee Non-MSA AA and lands the bank in the top 1.0 percent of lenders reporting such loans in this AA. This ranking considers the total number and dollar amount of home mortgage loans made by each institution.

Small Business Loans

The lending activity level reflects excellent performance for small business loans in the Tennessee Non-MSA AA. The institution originated 398 small business loans totaling approximately \$48.9 million in 2022, capturing an 8.3 percent market share of the total number of loans and a 22.9 percent market share of the total dollar volume of small business loans. The activity by number of loans ranks the bank 4th out of 81 reporting lenders in the Tennessee Non-MSA AA and lands the bank in the top 4.9 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of small business loans made by each institution.

Small Farm Loans

The lending activity level reflects excellent performance for small farm loans in the Tennessee Non-MSA AA. The institution originated 119 small farm loans totaling approximately \$5.9 million in 2022, capturing a 36.5 percent market share of the total number of loans and a 38.9 percent market share of the total dollar volume of small farm loans. The activity by number of loans ranks the bank 1st out of 18 reporting lenders in the Tennessee Non-MSA AA and lands the bank in the top 5.6 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of small farm loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Tennessee Non-MSA AA. Adequate performances regarding home mortgage, small business, and small farm loans support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the Tennessee Non-MSA AA. Adequate performance in the moderate-income geographies supports this conclusion.

As seen in the following table, CBL's lending in moderate-income CTs rises 0.2 percentage points above aggregate data, reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Tennessee Non-MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	0.0	0.0	0	0.0	0	0.0
Moderate	10.2	12.4	57	12.6	6,272	9.1
Middle	67.5	62.8	327	72.2	49,569	71.7
Upper	22.3	24.9	69	15.2	13,256	19.2
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	453	100.0	69,096	100.0
<i>Source: 2020 Census data, 2023 HMDA Aggregate data, and 2023 HMDA LAR data Due to rounding, totals may not equal 100.0 percent</i>						

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the Tennessee Non-MSA AA. Adequate performance in moderate-income geographies supports this conclusion.

As seen in the following table, CBL's lending in moderate-income CTs exceeds aggregate data by 3.1 percentage points, reflecting adequate performance.

Geographic Distribution of Small Business Loans Tennessee Non-MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	0.0	0.0	0	0.0	0	0.0
Moderate	14.8	13.5	66	16.6	8,555	17.5
Middle	61.7	63.6	275	69.1	31,581	64.6
Upper	23.5	22.9	57	14.3	8,758	17.9
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	398	100.0	48,894	100.0
Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent						

Small Farm Loans

The geographic distribution of small farm loans reflects adequate penetration throughout the Tennessee Non-MSA AA. Adequate performance in moderate-income geographies supports this conclusion.

As seen in the following table, CBL's lending in moderate-income CTs fell slightly below aggregate data by 0.5 percentage points, reflecting adequate performance.

Geographic Distribution of Small Farm Loans Tennessee Non-MSA AA						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low	0.0	0.0	0	0.0	0	0.0
Moderate	9.5	8.9	10	8.4	406	6.9
Middle	69.5	75.1	93	78.2	4,499	76.5
Upper	21.0	16.0	16	13.4	976	16.6
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	119	100.0	5,881	100.0
Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered, good penetration among retail customers of different income levels and business customers of different size in the Tennessee Non-MSA AA. Adequate performance regarding home mortgage loans and excellent performances regarding small business and small farm loans support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different sizes in the Tennessee Non-MSA AA. Adequate performances to both LMI borrowers support this conclusion.

As seen in the following table, CBL's lending to low-income borrowers exceeds aggregate data by 3.2 percent, reflecting adequate performance. The table further shows that to moderate-income borrowers, CBL's lending exceeds the aggregate by 2.3 percentage points, reflecting adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Tennessee Non-MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	18.9	3.4	30	6.6	1,480	2.1
Moderate	18.0	13.4	71	15.7	6,003	8.7
Middle	20.2	23.1	89	19.7	9,467	13.7
Upper	42.9	41.9	237	52.3	45,842	66.4
Not Available	0.0	18.2	26	5.7	6,304	9.1
Totals	100.0	100.0	453	100.0	69,096	100.0
<i>Source: 2020 Census data, 2023 HMDA Aggregate data, and 2023 HMDA LAR data Due to rounding, totals may not equal 100.0 percent</i>						

Small Business Loans

The distribution of borrowers reflects excellent penetration among business customers of different sizes in the Tennessee Non-MSA AA. Excellent performance to businesses with GARs of \$1.0 million or less supports this conclusion.

As seen in the following table, CBL's lending to businesses with GARs of \$1.0 million or less rises 18.4 percentage points higher than aggregate data, reflecting excellent performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Tennessee Non-MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	85.3	60.7	315	79.1	34,177	69.9
>\$1,000,000	3.5	--	56	14.1	13,307	27.2
Revenue Not Available	11.2	--	27	6.8	1,410	2.9
Totals	100.0	100.0	398	100.0	48,894	100.0
<i>Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent</i>						

Small Farm Loans

The distribution of borrowers reflects excellent penetration among farm customers of different sizes in the Tennessee Non-MSA AA. Excellent performance to farms with GARs of \$1.0 million or less supports this conclusion.

As seen in the following table, CBL's lending to farms with GARs of \$1.0 million or less rises 29.0 percentage points higher than aggregate data, reflecting excellent performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category Tennessee Non-MSA AA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	96.9	61.8	108	90.8	5,493	93.4
>\$1,000,000	0.9	--	3	2.5	186	3.2
Revenue Not Available	2.2	--	8	6.7	202	3.4
Totals	100.0	100.0	119	100.0	5,881	100.0
<i>Source: 2022 D&B data, 2022 CRA Aggregate data, and 2022 CRA LAR data Due to rounding, totals may not equal 100.0 percent</i>						

Innovative or Flexible Lending Practices

The institution makes limited use of innovative and flexible lending practices in order to serve AA credit needs in the Tennessee Non-MSA AA. The number and dollar volume of innovative loan products and flexible lending practices support this conclusion.

The bank originated 826 small dollar loans totaling \$1.3 million in the Tennessee Non-MSA AA. Given the bank's capacity and the needs in the AA, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the AA.

Community Development Loans

The institution made a relatively high level of CDLs in the Tennessee Non-MSA AA. The good level of CDLs outweighed the adequate responsiveness to CD needs in this AA to support this conclusion.

CBL originated five CDLs totaling \$11.5 million in the Tennessee Non-MSA AA. By dollar volume, this equates to 74.4 percent of the institution's total CDLs compared to 65.6 percent of the total loans in this AA. This performance represents an increase in the number and dollar amount of loans from one totaling \$700,000 from the prior evaluation.

The CDLs benefited revitalization or stabilization efforts, which is an identified need of the area. This reflects adequate responsiveness in addressing an identified need of the Tennessee Non-MSA AA.

Community Development Lending Tennessee Non-MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	0	0	0	0	1	1,000	0	0	1	1,000
2022	0	0	0	0	1	6,000	2	2,500	3	8,500
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	1	2,000	0	0	1	2,000
Total	0	0	0	0	3	9,000	2	2,500	5	11,500
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>										

The following provides examples of two CDLs in the Tennessee Non-MSA AA.

- ***Revitalize or Stabilize*** – The bank made a loan totaling \$500,000 to repair essential roads in Jackson County which was deemed a distressed middle-income geography and within an Opportunity Zone, providing essential community services to the area.
- ***Economic Development*** – A \$2.0 million loan was originated to a company that is located in a certified Historically Underutilized Business Zone that prioritizes hiring veterans, minorities, and LMI individuals in LMI areas, supporting economic development.

INVESTMENT TEST

CBL demonstrated an adequate record in the Tennessee Non-MSA AA regarding the Investment Test. An adequate level of QIs, adequate responsiveness to CD needs, and adequate CD initiatives support this conclusion.

Investment and Grant Activity

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the Tennessee Non-MSA AA. The adequate level of QIs supports this conclusion.

As seen in the following table, CBL made 37 QIs totaling approximately \$71,000 in the Tennessee Non-MSA AA. By dollar volume, this equates to 0.3 percent of the institution's total QIs as compared to 61.6 percent of the deposits for this area, which seems low; however, examiners considered that 94.0 percent of the total QIs benefited the statewide area, which includes the Tennessee Non-MSA AA. Considering this performance context, the level of QIs is adequate. This is an increase from the previous evaluation in which the bank did not make any QIs in this AA.

The following table details the QIs by year and purpose.

Qualified Investments Tennessee Non-MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	0	0	0	0	0	0
Subtotal	0	0	0	0	0	0	0	0	0	0
Qualified Grants & Donations	0	0	31	16	5	55	1	0	37	71
Total	0	0	31	16	5	55	1	0	37	71
Source: Bank data (6/22/2021 – 12/16/2024)										

The following lists notable examples of QIs in the Tennessee Non-MSA:

- **Community Services** – The bank made nearly \$7,000 in donations to various organizations that provide school supplies to children in need, providing a community service to LMI families.
- **Economic Development** – The bank made three donations totaling \$15,000 to a local organization that provides opportunities for local businesses through economic development and education and workforce development.

Responsiveness to Credit and Community Development Needs

CBL exhibits adequate responsiveness to credit and CD needs in the Tennessee Non-MSA AA. The prior table shows that QIs supported CD purposes for community services and revitalization and stabilization efforts, both identified needs.

Community Development Initiatives

CBL occasionally uses innovative or complex investments to support CD initiatives in the Tennessee Non-MSA AA. Refer to the Community Development Initiatives Section at the Institution level for more information.

SERVICE TEST

CBL demonstrated a poor record in the Tennessee Non-MSA AA regarding the Service Test. A very poor level of CD services, good access to delivery systems, good opening and closing of branches, and adequate services and hours support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the Tennessee Non-MSA AA. Good branch distribution and good alternative delivery systems support this conclusion.

The following table shows that in moderate-income CTs, the percentage of CBL's branches rises 9.2 percentage points above the population residing in those areas, which reflects a good level.

Branch and ATM Distribution by Geography Income Level Tennessee Non-MSA AA												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	9	12.2	40,773	13.9	3	23.1	3	27.3	1	33.3	0	0.0
Middle	47	63.5	189,930	64.9	7	53.8	5	45.4	1	33.3	2	100.0
Upper	17	23.0	61,837	21.2	3	23.1	3	27.3	1	33.3	0	0.0
NA	1	1.3	3	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	74	100.0	292,543	100.0	13	100.0	11	100.0	3	100.0	2	100.0
<i>Source: 2020 Census data and Bank data Due to rounding, totals may not equal 100.0 percent</i>												

The institution's alternative delivery systems are accessible to essentially all portions of the Tennessee Non-MSA AA. The excellent level of ATMs and the adequate level of other alternative delivery systems support this conclusion.

The level of ATMs in moderate-income CTs exceeds the population by 13.4 percentage points, reflecting an excellent level.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

To the extent changes have been made, the opening and closing of branches has not adversely affected the accessibility of delivery systems, particularly in LMI geographies and to LMI individuals. As seen in the previous table, CBL opened one branch in a moderate-income CT with the acquisition of ABT. Additionally, CBL did not close any branches in LMI CTs during the evaluation period

Reasonableness of Business Hours and Services

Services (including where appropriate, business hours) do not vary in a way that inconveniences portions of the Tennessee Non-MSA AA, particularly LMI geographies or individuals. All 13 locations in the Tennessee Non-MSA AA operate from either 8:00 or 8:30 am to 4:00 or 4:30 pm Monday through Thursday, with the exception of the Livingston branch drive thru that opens at 7:30 am. On Friday, the lobbies close at 5:00 pm. However, only seven of the branches are open for business on Saturdays.

Community Development Services

The institution provides few, if any, CD services in the Tennessee Non-MSA AA. The very low level of CD services outweighed the poor responsiveness to CD needs to support this conclusion.

The following table shows the institution provided only five CD services since the previous evaluation in the Tennessee Non-MSA AA. This level equates to 13.9 percent of all the CD services as compared to 59.1 percent of the branches in this AA. This number also equates to an average of 0.1 CD services per office, per year, thereby reflecting a very poor level. The level of CD services has decreased from the 8 CD services provided at the prior evaluation.

Service activities benefited community services, which is a need of the AA; however, the services were minimal. This demonstrates poor responsiveness in addressing CD needs in the Tennessee Non-MSA AA.

Community Development Services Tennessee Non-MSA AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	0	0	1	0	1
2022	0	0	1	0	1
2023	0	0	1	0	1
2024	0	1	1	0	2
Total	0	1	4	0	5
<i>Source: Bank data (6/22/2021 – 12/16/2024)</i>					

The following are examples of CD services specific to the Tennessee Non-MSA AA:

- ***Community Services*** – A bank employee serves as a member for a local club that provides financial, professional, and physical assistance for people in need, providing a community service in the area.
- ***Economic Development*** – A bank employee serves as a board member for an area economic development board focused on development of the county by bringing jobs for LMI residents along with facilitating the creation and growth of small businesses.

APPENDICES

LARGE 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) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
 - i. The proportion of the bank's lending in the bank's assessment area(s);
 - ii. The dispersion of lending in the bank's assessment areas(s); and
 - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
 - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
 - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
 - iii. Small business and small farm loans by loan amount at origination; and
 - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

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

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

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

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

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

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

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

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

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

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

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

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage 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 (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

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.

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

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 and less than 120 percent in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 and less than 80 percent in the case of a geography.

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

Nonmetropolitan Area (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.



CITIZENS BANK

CITIZENS BANK FAMILY
BANK OF CELINA • LIBERTY STATE BANK
SMITH COUNTY BANK • TRADERS BANK
AMERICAN BANK & TRUST

Community Reinvestment Act Notice

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each calendar quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination for the next two quarters. This list is available from Kristie Elmquist, Regional Director, FDIC at 600 North Pearl Street, Suite 700, Dallas, TX 7520. You may send written comments about our performance in helping to meet community credit needs to Cecilia Russell at 400 Hwy 52 Bypass West, Lafayette, TN 37083 and the FDIC Regional Director. You may also submit comments electronically through the FDIC's website at www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Citizens Bancorp Investment, Inc., a bank holding company. You may request from the Regional Director, FDIC, Federal Reserve Bank of Dallas at 600 North Pearl Street, Suite 700, Dallas, TX 7520, an announcement of applications covered by the CRA filed by bank holding companies.



CITIZENS BANK

CITIZENS BANK FAMILY
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Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the FDIC, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) a map showing the assessment area containing this branch, which is the area in which the FDIC evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at the Lafayette Main Office, located at 400 TN-52 Bypass, Lafayette, TN 37083.

At least 30 days before the beginning of each calendar quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination for the next two quarters. This list is available from the Kristie Elmquist, Regional Director, FDIC at 600 North Pearl Street, Suite 700, Dallas, TX 7520. You may send written comments about our performance in helping to meet community credit needs to Cecilia Russell at 400 TN-52 Bypass, Lafayette, TN 37083 and the FDIC Regional Director. You may also submit comments electronically through the FDIC's website at www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Citizens Bancorp Investment, Inc, a bank holding company. You may request from the Regional Director, FDIC, Federal Reserve Bank of Dallas at 600 North Pearl Street, Suite 700, Dallas, TX 7520, an announcement of applications covered by the CRA filed by bank holding companies.

HMDA Disclosure Statement

Home Mortgage Disclosure Act (HMDA) data about the Bank's residential mortgage lending is available online for review. The data shows geographic distribution of loans and applications, ethnicity, race, sex, age and income of applicants and borrowers, and information about loan approvals and denials. These datasets are available online at the Consumer Financial Protection Bureau (CFPB) website¹. Additionally, HMDA data for many other financial institutions is also available at this website.

For HMDA Aggregate and Disclosure Statements collected **prior to 2017** users will have to go to the Federal Financial Institutions Examination Council (FFIEC) website² and perform the following steps to access statements online:

- 1) Select the desired year
- 2) Enter the Charter Number (Respondent ID) or the Institution Name (ex: Citizens Bank of Lafayette)
- 3) **Click** Retrieve Institutions
- 4) Select the Institution name and click Select Institution
- 5) Select the area of focus (ex: Nashville-Davidson-Murfreesboro)
- 6) **Click** Select MSA/MD
- 7) Select the desired report (ex: Disclosure Table 1: Disposition Of Loan Applications, by Location of Property and Type of Loan)
- 8) Select the report file format (ex: PDF)
- 9) **Click** Retrieve Report

In order to access HMDA Disclosure Statements associated with 2017 and future years online please use the following instructions:

- 1) Navigate to the FFIEC/CFPB HMDA Data Publication website³
- 2) Select Disclosure Reports
- 3) Enter the Institution Name (ex: Citizens Bank of Lafayette)
- 4) Select or Enter the MSA/MD name (ex: Nationwide)
- 5) Choose a generated report (ex: Applications by Tract, Loans Purchased by Tract)
- 6) **Click** Save as CSV

¹ CFPB HMDA Website: <https://www.consumerfinance.gov/data-research/hmda/>

² FFIEC HMDA Disclosure Report Website: <https://www.ffiec.gov/hmdaadwebreport/DisWelcome.aspx>

³ FFIEC/CFPB HMDA Data Publication Website: <https://ffiec.cfpb.gov/data-publication>

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: ALABAMA (01)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TUSCALOOSA COUNTY (125), AL										
MSA 46220										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	10	0	0	0	0	1	10	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	10	0	0	0	0	1	10	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	10	0	0	0	0	1	10	0	0
STATE TOTAL	1	10	0	0	0	0	1	10	0	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: KENTUCKY (21)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ALLEN COUNTY (003), KY										
MSA 14540										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	4	196	1	200	0	0	4	323	0	0
Middle Income	2	33	0	0	0	0	2	33	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	6	229	1	200	0	0	6	356	0	0
BARREN COUNTY (009), KY										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	4	63	0	0	0	0	4	63	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	63	0	0	0	0	4	63	0	0
BUTLER COUNTY (031), KY										
MSA 14540										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	5	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	5	0	0	0	0	0	0	0	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: KENTUCKY (21)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
CUMBERLAND COUNTY (057), KY										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	100	1	172	0	0	2	272	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	100	1	172	0	0	2	272	0	0
MONROE COUNTY (171), KY										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	4	159	0	0	0	0	4	159	0	0
Middle Income	1	15	0	0	0	0	1	15	0	0
Upper Income	1	4	0	0	0	0	1	4	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	6	178	0	0	0	0	6	178	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	18	575	2	372	0	0	18	869	0	0
STATE TOTAL	18	575	2	372	0	0	18	869	0	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: PENNSYLVANIA (42)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
PHILADELPHIA COUNTY (101), PA										
MSA 37964										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	1	500	1	500	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	500	1	500	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	500	1	500	0	0
STATE TOTAL	0	0	0	0	1	500	1	500	0	0

Loans by County

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Small Business Loans - Originations

Institution: CITIZENS BANK

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
BEDFORD COUNTY (003), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	3	50	0	0	4	2,457	5	1,977	0	0
Middle Income	11	715	1	150	6	3,950	13	2,748	0	0
Upper Income	5	162	1	238	1	605	7	1,005	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	19	927	2	388	11	7,012	25	5,730	0	0
BLOUNT COUNTY (009), TN										
MSA 28940										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	1	135	0	0	1	135	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	1	135	0	0	1	135	0	0
CANNON COUNTY (015), TN										
MSA 34980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	7	197	0	0	0	0	7	197	0	0
Middle Income	0	0	1	150	0	0	1	150	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	7	197	1	150	0	0	8	347	0	0

Loans by County

Small Business Loans - Originations

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
CLAY COUNTY (027), TN									
MSA NA									
Inside AA 0001									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	21	738	4	568	3	1,103	26	2,400	0
Middle Income	14	594	1	200	0	0	12	636	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	35	1,332	5	768	3	1,103	38	3,036	0
COFFEE COUNTY (031), TN									
MSA NA									
Inside AA 0001									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	2	358	0	0	2	358	0
Middle Income	9	564	1	250	8	3,331	11	1,639	0
Upper Income	3	166	1	150	2	1,440	4	606	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	12	730	4	758	10	4,771	17	2,603	0
CUMBERLAND COUNTY (035), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	1	222	2	572	2	572	0
Middle Income	0	0	0	0	1	359	1	359	0
Upper Income	0	0	0	0	1	400	1	400	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	0	0	1	222	4	1,331	4	1,331	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
DAVIDSON COUNTY (037), TN										
MSA 34980										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	1	175	0	0	1	175	0	0
Median Family Income 70-80%	2	83	0	0	0	0	0	0	0	0
Median Family Income 80-90%	1	68	2	400	0	0	3	468	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	1	525	1	525	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	1	240	1	375	1	375	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	151	4	815	2	900	6	1,543	0	0
DEKALB COUNTY (041), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	2	22	3	553	0	0	4	568	0	0
Middle Income	10	359	2	450	3	1,120	15	1,929	0	0
Upper Income	1	25	0	0	0	0	1	25	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	13	406	5	1,003	3	1,120	20	2,522	0	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
FRANKLIN COUNTY (051), TN									
MSA NA									
Inside AA 0001									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	6	283	2	393	2	1,480	8	1,106	0
Upper Income	1	10	0	0	3	1,695	3	1,366	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	7	293	2	393	5	3,175	11	2,472	0
GILES COUNTY (055), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	3	159	0	0	1	510	4	669	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	3	159	0	0	1	510	4	669	0
HICKMAN COUNTY (081), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0
Upper Income	0	0	1	150	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	0	0	1	150	0	0	0	0	0

Loans by County

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Small Business Loans - Originations
Institution: CITIZENS BANK

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
JACKSON COUNTY (087), TN									
MSA NA									
Inside AA 0001									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	27	666	4	774	1	300	29	1,284	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	27	666	4	774	1	300	29	1,284	0
KNOX COUNTY (093), TN									
MSA 28940									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	2	100	0	0	0	0	2	100	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	2	100	0	0	0	0	2	100	0
LINCOLN COUNTY (103), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	1	30	0	0	0	0	1	30	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	1	30	0	0	0	0	1	30	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
MACON COUNTY (111), TN									
MSA 34980									
Inside AA 0001									
Low Income	19	673	8	1,295	6	2,878	25	3,778	0
Moderate Income	46	1,680	16	2,753	5	2,502	52	3,863	0
Middle Income	29	1,035	3	483	4	1,496	32	1,952	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	94	3,388	27	4,531	15	6,876	109	9,593	0
MARSHALL COUNTY (117), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	2	93	0	0	0	0	2	93	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	2	93	0	0	0	0	2	93	0
MAURY COUNTY (119), TN									
MSA 34980									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	1	152	0	0	1	152	0
Middle Income	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	0	0	1	152	0	0	1	152	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MONTGOMERY COUNTY (125), TN										
MSA 17300										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	1	280	1	280	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	280	1	280	0	0
MOORE COUNTY (127), TN										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	3	176	0	0	0	0	3	176	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	176	0	0	0	0	3	176	0	0
MORGAN COUNTY (129), TN										
MSA 28940										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	38	0	0	0	0	1	38	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	38	0	0	0	0	1	38	0	0

Loans by County

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Small Business Loans - Originations
Institution: CITIZENS BANK

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
OVERTON COUNTY (133), TN									
MSA NA									
Inside AA 0001									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	17	555	6	913	2	749	22	1,621	0
Middle Income	52	1,483	12	2,172	12	5,271	73	8,392	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	69	2,038	18	3,085	14	6,020	95	10,013	0
PICKETT COUNTY (137), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	1	10	0	0	0	0	1	10	0
Middle Income	0	0	1	187	0	0	1	187	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	1	10	1	187	0	0	2	197	0
PUTNAM COUNTY (141), TN									
MSA NA									
Inside AA 0001									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	2	175	1	200	2	838	5	1,213	0
Middle Income	28	1,187	17	3,024	18	6,988	58	10,627	0
Upper Income	13	379	1	250	11	5,216	25	5,845	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	43	1,741	19	3,474	31	13,042	88	17,685	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ROBERTSON COUNTY (147), TN										
MSA 34980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	23	0	0	0	0	1	23	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	23	0	0	0	0	1	23	0	0
RUTHERFORD COUNTY (149), TN										
MSA 34980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	100	0	0	0	0	1	100	0	0
Middle Income	3	159	0	0	2	1,052	4	549	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	259	0	0	2	1,052	5	649	0	0
SEVIER COUNTY (155), TN										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	1	699	1	699	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	699	1	699	0	0

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
SMITH COUNTY (159), TN										
MSA 34980										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	11	342	2	227	3	2,036	14	2,500	0	0
Middle Income	3	31	0	0	0	0	3	31	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	14	373	2	227	3	2,036	17	2,531	0	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Loans by County

Respondent ID: 0000001711

Small Business Loans - Originations

Agency: FDIC - 3

Institution: CITIZENS BANK

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
SUMNER COUNTY (165), TN 2/										
MSA 34980										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	10	371	10	1,766	2	1,468	21	3,405	0	0
Middle Income	18	503	3	500	3	1,260	20	1,188	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	28	874	13	2,266	5	2,728	41	4,593	0	0
Outside Assessment Area										
Low Income	1	50	0	0	0	0	1	50	0	0
Moderate Income	3	155	0	0	0	0	3	155	0	0
Middle Income	9	207	4	785	2	575	14	1,317	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	13	412	4	785	2	575	18	1,522	0	0
Totals For County: (165) 2/										
Low Income	1	50	0	0	0	0	1	50	0	0
Moderate Income	13	526	10	1,766	2	1,468	24	3,560	0	0
Middle Income	27	710	7	1,285	5	1,835	34	2,505	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	41	1,286	17	3,051	7	3,303	59	6,115	0	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
TROUSDALE COUNTY (169), TN									
MSA 34980									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	2	100	6	1,278	1	910	9	2,288	0
Middle Income	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	2	100	6	1,278	1	910	9	2,288	0
VAN BUREN COUNTY (175), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	500	1	500	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	500	1	500	0
WARREN COUNTY (177), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	1	162	0	0	1	162	0
Middle Income	0	0	0	0	3	1,108	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	0	0	1	162	3	1,108	1	162	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Loans by County
Small Business Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
WAYNE COUNTY (181), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	1	30	0	0	0	0	1	30	0
Upper Income	0	0	0	0	1	531	1	531	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	1	30	0	0	1	531	2	561	0
WHITE COUNTY (185), TN									
MSA NA									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	1	100	0	0	0	0	1	100	0
Middle Income	5	288	3	615	4	1,254	12	2,157	0
Upper Income	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	6	388	3	615	4	1,254	13	2,257	0
WILLIAMSON COUNTY (187), TN									
MSA 34980									
Outside Assessment Area									
Low Income	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0
Upper Income	3	72	0	0	0	0	2	47	0
Income Not Known	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0
County Total	3	72	0	0	0	0	2	47	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Loans by County

Respondent ID: 0000001711

Small Business Loans - Originations

Agency: FDIC - 3

Institution: CITIZENS BANK

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
WILSON COUNTY (189), TN 2/										
MSA 34980										
Inside AA 0001										
Low Income	5	167	0	0	2	1,104	6	1,221	0	0
Moderate Income	7	200	3	511	5	2,813	11	1,405	0	0
Middle Income	2	197	2	278	1	322	5	797	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	14	564	5	789	8	4,239	22	3,423	0	0
Outside Assessment Area										
Moderate Income	2	58	0	0	0	0	2	58	0	0
Middle Income	7	237	3	362	4	1,297	12	1,517	0	0
Upper Income	2	50	1	200	3	1,893	6	2,143	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	11	345	4	562	7	3,190	20	3,718	0	0
Totals For County: (189) 2/										
Low Income	5	167	0	0	2	1,104	6	1,221	0	0
Moderate Income	9	258	3	511	5	2,813	13	1,463	0	0
Middle Income	9	434	5	640	5	1,619	17	2,314	0	0
Upper Income	2	50	1	200	3	1,893	6	2,143	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	25	909	9	1,351	15	7,429	42	7,141	0	0
TOTAL INSIDE AA IN STATE	375	13,332	106	18,456	109	52,422	512	65,485	0	0
TOTAL OUTSIDE AA IN STATE	64	2,583	28	5,213	30	12,840	109	17,517	0	0
STATE TOTAL	439	15,915	134	23,669	139	65,262	621	83,002	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	375	13,332	106	18,456	109	52,422	512	65,485	0	0
TOTAL OUTSIDE AA	83	3,168	30	5,585	31	13,340	129	18,896	0	0
TOTAL INSIDE & OUTSIDE	458	16,500	136	24,041	140	65,762	641	84,381	0	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Loans by County
Small Business Loans - Purchases
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
HOOD COUNTY (221), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	55	0	0	0	0	1	55	1	55
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	55	0	0	0	0	1	55	1	55
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	55	0	0	0	0	1	55	1	55
STATE TOTAL	1	55	0	0	0	0	1	55	1	55
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA	2	142	0	0	0	0	2	142	2	142
TOTAL INSIDE & OUTSIDE	2	142	0	0	0	0	2	142	2	142

Loans by County
Small Farm Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: KENTUCKY (21)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TOTAL OUTSIDE AA IN STATE	10	226	4	738	1	380	13	1,225	0	0
STATE TOTAL	10	226	4	738	1	380	13	1,225	0	0

Loans by County

Small Farm Loans - Originations

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
BEDFORD COUNTY (003), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	30	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	364	1	364	0	0
Upper Income	0	0	1	140	1	252	2	392	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	30	1	140	2	616	3	756	0	0
CANNON COUNTY (015), TN										
MSA 34980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	3	95	2	350	0	0	4	215	0	0
Middle Income	1	10	0	0	0	0	1	10	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	105	2	350	0	0	5	225	0	0
CLAY COUNTY (027), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	34	0	0	0	0	1	34	0	0
Middle Income	4	48	0	0	0	0	2	17	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	5	82	0	0	0	0	3	51	0	0

Loans by County

Small Farm Loans - Originations

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
COFFEE COUNTY (031), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	3	41	0	0	0	0	3	41	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	41	0	0	0	0	3	41	0	0
DEKALB COUNTY (041), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	11	211	0	0	0	0	11	211	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	11	211	0	0	0	0	11	211	0	0
FRANKLIN COUNTY (051), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	2	40	0	0	0	0	2	40	0	0
Upper Income	1	3	0	0	0	0	1	3	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	43	0	0	0	0	3	43	0	0

Loans by County

Small Farm Loans - Originations

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
GILES COUNTY (055), TN										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	20	0	0	0	0	1	20	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	20	0	0	0	0	1	20	0	0
JACKSON COUNTY (087), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	6	150	5	857	0	0	11	1,007	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	6	150	5	857	0	0	11	1,007	0	0
MACON COUNTY (111), TN										
MSA 34980										
Inside AA 0001										
Low Income	3	237	0	0	2	730	5	967	0	0
Moderate Income	28	709	2	300	2	700	30	1,659	0	0
Middle Income	22	793	2	251	0	0	22	879	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	53	1,739	4	551	4	1,430	57	3,505	0	0

Loans by County

Small Farm Loans - Originations

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
OVERTON COUNTY (133), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	2	107	0	0	0	0	2	107	0	0
Middle Income	9	271	2	312	0	0	11	583	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	11	378	2	312	0	0	13	690	0	0
PICKETT COUNTY (137), TN										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	8	0	0	0	0	1	8	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	8	0	0	0	0	1	8	0	0
PUTNAM COUNTY (141), TN										
MSA NA										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	2	81	0	0	0	0	2	81	0	0
Upper Income	1	15	0	0	0	0	1	15	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	96	0	0	0	0	3	96	0	0

Loans by County
Small Farm Loans - Originations
Institution: CITIZENS BANK

Respondent ID: 0000001711
Agency: FDIC - 3
State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
RUTHERFORD COUNTY (149), TN										
MSA 34980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	27	0	0	0	0	1	27	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	27	0	0	0	0	1	27	0	0
SMITH COUNTY (159), TN										
MSA 34980										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	7	87	0	0	0	0	7	87	0	0
Middle Income	1	27	1	106	0	0	2	133	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	8	114	1	106	0	0	9	220	0	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Loans by County

Small Farm Loans - Originations

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
SUMNER COUNTY (165), TN 2/										
MSA 34980										
Inside AA 0001										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	6	127	3	368	1	500	9	992	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	6	127	3	368	1	500	9	992	0	0
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	3	110	0	0	0	0	3	110	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	110	0	0	0	0	3	110	0	0
Totals For County: (165) 2/										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	6	127	3	368	1	500	9	992	0	0
Middle Income	3	110	0	0	0	0	3	110	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	9	237	3	368	1	500	12	1,102	0	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Loans by County

Small Farm Loans - Originations

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TROUSDALE COUNTY (169), TN										
MSA 34980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	3	171	0	0	0	0	3	171	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	171	0	0	0	0	3	171	0	0
WILSON COUNTY (189), TN 2/										
MSA 34980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	2	38	0	0	0	0	2	38	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	38	0	0	0	0	2	38	0	0
TOTAL INSIDE AA IN STATE	110	3,011	16	2,334	7	2,546	125	7,612	0	0
TOTAL OUTSIDE AA IN STATE	15	479	2	350	0	0	16	599	0	0
STATE TOTAL	125	3,490	18	2,684	7	2,546	141	8,211	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	110	3,011	16	2,334	7	2,546	125	7,612	0	0
TOTAL OUTSIDE AA	25	705	6	1,088	1	380	29	1,824	0	0
TOTAL INSIDE & OUTSIDE	135	3,716	22	3,422	8	2,926	154	9,436	0	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

2023 Institution Disclosure Statement - Table 3
Assessment Area/Non-Assessment Area Activity
Small Business Loans
Institution: CITIZENS BANK

PAGE: 1 OF 1
Respondent ID: 0000001711
Agency: FDIC - 3

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TN - BEDFORD COUNTY (003) - MSA NA	32	8,327	25	5,730	0	0
TN - CLAY COUNTY (027) - MSA NA	43	3,203	38	3,036	0	0
TN - COFFEE COUNTY (031) - MSA NA	26	6,259	17	2,603	0	0
TN - DEKALB COUNTY (041) - MSA NA	21	2,529	20	2,522	0	0
TN - FRANKLIN COUNTY (051) - MSA NA	14	3,861	11	2,472	0	0
TN - JACKSON COUNTY (087) - MSA NA	32	1,740	29	1,284	0	0
TN - MACON COUNTY (111) - MSA 34980	136	14,795	109	9,593	0	0
TN - OVERTON COUNTY (133) - MSA NA	101	11,143	95	10,013	0	0
TN - PUTNAM COUNTY (141) - MSA NA	93	18,257	88	17,685	0	0
TN - SMITH COUNTY (159) - MSA 34980	19	2,636	17	2,531	0	0
TN - SUMNER COUNTY (165) - MSA 34980 2/	46	5,868	41	4,593	0	0
TN - WILSON COUNTY (189) - MSA 34980 2/	27	5,592	22	3,423	0	0

Footnote:
 2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

2023 Institution Disclosure Statement - Table 4

Assessment Area/Non-Assessment Area Activity

Small Farm Loans

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

ASSESSMENT AREA LOANS	Originations		Originations to Farms with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TN - BEDFORD COUNTY (003) - MSA NA	4	786	3	756	0	0
TN - CLAY COUNTY (027) - MSA NA	5	82	3	51	0	0
TN - COFFEE COUNTY (031) - MSA NA	3	41	3	41	0	0
TN - DEKALB COUNTY (041) - MSA NA	11	211	11	211	0	0
TN - FRANKLIN COUNTY (051) - MSA NA	3	43	3	43	0	0
TN - JACKSON COUNTY (087) - MSA NA	11	1,007	11	1,007	0	0
TN - MACON COUNTY (111) - MSA 34980	61	3,720	57	3,505	0	0
TN - OVERTON COUNTY (133) - MSA NA	13	690	13	690	0	0
TN - PUTNAM COUNTY (141) - MSA NA	3	96	3	96	0	0
TN - SMITH COUNTY (159) - MSA 34980	9	220	9	220	0	0
TN - SUMNER COUNTY (165) - MSA 34980 2/	10	995	9	992	0	0

Footnote:

2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Memo Item: Loans by Affiliates				
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Community Development Loans				
Originated	0	0	0	0
Purchased	0	0	0	0
Total	0	0	0	0
Consortium/Third Party Loans (optional)				

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

* denotes no loans made in specified tracts

Institution: CITIZENS BANK

Respondent ID: 0000001711

Agency: FDIC - 3

ASSESSMENT AREA - 0001

BEDFORD COUNTY (003), TN

MSA: NA

Moderate Income

9504.02

Middle Income

9502.02 9503.00 9505.00 9506.00 9507.00*

Upper Income

9501.00* 9502.01* 9504.01 9508.00

CLAY COUNTY (027), TN

MSA: NA

Moderate Income

9550.00

Middle Income

9551.00

COFFEE COUNTY (031), TN

MSA: NA

Moderate Income

9702.01* 9705.01 9709.00

Middle Income

9701.00 9702.02 9704.02 9706.00 9707.00* 9710.01 9710.02

Upper Income

9703.00* 9704.01* 9705.02* 9708.01* 9708.03 9708.04

Income Not Known

9801.00*

DEKALB COUNTY (041), TN

MSA: NA

Moderate Income

9202.01

2023 Institution Disclosure Statement - Table 6

Respondent ID: 0000001711

Agency: FDIC - 3

Assessment Area(s) by Tract
* denotes no loans made in specified tracts

Institution: CITIZENS BANK									
MSA: NA									
Moderate Income									
0003.04	0008.00								
Middle Income									
0001.00	0002.01	0002.02	0003.01	0003.03	0003.05	0005.00	0007.00	0009.00	0010.00 0011.00
0012.01	0012.02								
Upper Income									
0004.00	0006.00	0013.00							
SMITH COUNTY (159), TN									
MSA: 34980									
Moderate Income									
9751.00	9752.00	9753.00	9754.00						
Middle Income									
9750.00									
SUMNER COUNTY (165), TN 2/									
MSA: 34980									
Moderate Income									
0201.01	0201.02								
Middle Income									
0206.01	0206.02								
WILSON COUNTY (189), TN 2/									
MSA: 34980									
Low Income									
0307.00									
Moderate Income									
0304.01	0304.02	0305.00							
Middle Income									
0301.02	0306.00								
Upper Income									

Footnote:
2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

0303.08*	0303.10*
<u>OUTSIDE ASSESSMENT AREA</u>	
TUSCALOOSA COUNTY (125), AL	
MSA: 46220	
Middle Income	
0103.03	
LOS ANGELES COUNTY (037), CA	
MSA: 31084	
Median Family Income >= 120%	
4807.03	
ALLEN COUNTY (003), KY	
MSA: 14540	
Moderate Income	
9203.00	9205.00
Middle Income	
9204.00	9206.00
BARREN COUNTY (009), KY	
MSA: NA	
Upper Income	
9509.00	
BUTLER COUNTY (031), KY	
MSA: 14540	
Middle Income	
9305.00	
CUMBERLAND COUNTY (057), KY	
MSA: NA	
Middle Income	
9502.00	

Footnote:
2f County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Respondent ID: 0000001711

Agency: FDIC - 3

* denotes no loans made in specified tracts

Institution: CITIZENS BANK	
MONROE COUNTY (171), KY	
MSA: NA	
Moderate Income	
9302.00	
Middle Income	
9304.00	
Upper Income	
9301.00	
PHILADELPHIA COUNTY (101), PA	
MSA: 37964	
Median Family Income 70-80%	
0020.00	
BLOUNT COUNTY (009), TN	
MSA: 28940	
Middle Income	
0114.04	
CANNON COUNTY (015), TN	
MSA: 34980	
Moderate Income	
9601.00 9602.01	
Middle Income	
9603.00	
CUMBERLAND COUNTY (035), TN	
MSA: NA	
Moderate Income	
9704.01 9705.02	
Middle Income	
9703.02	
Upper Income	

Footnote:
2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Respondent ID: 0000001711

Agency: FDIC - 3

Assessment Area(s) by Tract

* denotes no loans made in specified tracts

Institution: CITIZENS BANK

9701.01
DAVIDSON COUNTY (037), TN
MSA: 34980
Median Family Income 60-70%
0172.00
Median Family Income 70-80%
0156.30
Median Family Income 80-90%
0105.01 0156.14 0156.36
Median Family Income 100-110%
0191.16
Median Family Income >= 120%
0156.35 0184.05
GILES COUNTY (055), TN
MSA: NA
Middle Income
9204.00 9206.00
HICKMAN COUNTY (081), TN
MSA: NA
Upper Income
9505.00
KNOX COUNTY (093), TN
MSA: 28940
Middle Income
0062.08
LINCOLN COUNTY (103), TN
MSA: NA
Middle Income
9751.00

Footnote:
2f County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Assessment Area(s) by Tract

* denotes no loans made in specified tracts

Institution: CITIZENS BANK	
MARSHALL COUNTY (117), TN	
MSA: NA	
Middle Income	
9551.00	9552.00
MAURY COUNTY (119), TN	
MSA: 34980	
Moderate Income	
0101.00	
MONTGOMERY COUNTY (125), TN	
MSA: 17300	
Upper Income	
1018.07	
MOORE COUNTY (127), TN	
MSA: NA	
Upper Income	
9302.00	
MORGAN COUNTY (129), TN	
MSA: 28940	
Moderate Income	
1102.00	
PICKETT COUNTY (137), TN	
MSA: NA	
Moderate Income	
9251.02	
Middle Income	
9251.01	
ROBERTSON COUNTY (147), TN	
MSA: 34980	

Footnote:
2f County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Respondent ID: 0000001711

Agency: FDIC - 3

Assessment Area(s) by Tract

* denotes no loans made in specified tracts

Institution: CITIZENS BANK				
Middle Income				
0806.06				
RUTHERFORD COUNTY (149), TN				
MSA: 34980				
Moderate Income				
0409.01				
Middle Income				
0403.10	0405.02	0406.00	0407.04	
Upper Income				
0410.00				
SEVIER COUNTY (155), TN				
MSA: NA				
Moderate Income				
0808.04				
SUMNER COUNTY (165), TN 2/				
MSA: 34980				
Low Income				
0208.00				
Moderate Income				
0202.08	0207.00			
Middle Income				
0202.04	0202.09	0204.04	0206.03	0210.05 0212.04
TROUSDALE COUNTY (169), TN				
MSA: 34980				
Moderate Income				
0901.00	0902.00			
VAN BUREN COUNTY (175), TN				
MSA: NA				
Middle Income				

Footnote:
2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Assessment Area(s) by Tract

Respondent ID: 0000001711

* denotes no loans made in specified tracts

Agency: FDIC - 3

Institution: CITIZENS BANK		
9252.00		
WARREN COUNTY (177), TN		
MSA: NA		
Moderate Income		
9305.00		
Middle Income		
9308.00		
WAYNE COUNTY (181), TN		
MSA: NA		
Middle Income		
9503.00		
Upper Income		
9502.00		
WHITE COUNTY (185), TN		
MSA: NA		
Moderate Income		
9354.00		
Middle Income		
9351.00	9352.00	9353.00
WILLIAMSON COUNTY (187), TN		
MSA: 34980		
Upper Income		
0509.08	0511.00	
WILSON COUNTY (189), TN 2/		
MSA: 34980		
Moderate Income		
0308.00		
Middle Income		
0301.03	0302.02	0309.04 0310.00

Footnote:
2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Upper Income			
0301.04	0302.03	0303.05	0303.09 0309.05
HOOD COUNTY (221), TX			
MSA: NA			
Upper Income			
1601.00			

Footnote:
2/ County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

Record Identifier: 11	Total Composite Records on File	Total Composite Records Without Errors	Total Validity ¹⁰ Errors	Percentage of Validity Errors
Transmittal Sheet	1	1	0	0.00%
Small Business Loans	161	161	0	0.00%
Small Farm Loans	52	52	0	0.00%
Community Development Loans	1	1	0	0.00%
Consortium/Third Party Loans (Optional)	0	0	0	0.00%
Assessment Area	22	22	0	0.00%
Total	237	237	0	0.00%

Footnote:

10. A validity edit helps to verify the accuracy of the data reported. An institution's CRA submission that passes all validity edits does not ensure 100% accurate data. True accuracy is determined during the examination process.

11. A record represents one row of data reported to the Federal Reserve Board. This does not in any way represent the number of loans originated or purchased by the institution.

CRA: Assessment Area Concentration
Lending Test 1

All Combined Assessment Areas

2024

CITIZENS BANK

Reporting Period: 1/1/2024 to 12/31/2024
Last Action Date: 12/31/2024
Report Filters: Filter details at End of Report

Code	Loan Type	Inside Loans			Outside Loans			Total Loans		
		#	% Column	% Inside	#	% Column	% Outside	#	%	
HMDA										
1	Home Purchase	93	21.09	76.86	28	26.42	23.14	121	22.12	
2	Home Improvement	56	12.70	78.87	15	14.15	21.13	71	12.98	
31	Refinancing	170	38.55	79.81	43	40.57	20.19	213	38.94	
32	Cash-Out Refi	0	0.00	0.00	1	0.94	100.00	1	0.18	
4	Other	122	27.66	86.52	19	17.92	13.48	141	25.78	
5	Not Applicable	0	0.00	0.00	0	0.00	0.00	0	0.00	
	HMDA - Total	441	100.00	80.62	106	100.00	19.38	547	100.00	
CRA										
1	Small Business	377	70.20	79.87	95	77.24	20.13	472	71.52	
2	Small Farm	160	29.80	85.11	28	22.76	14.89	188	28.48	
	CRA - Total	537	100.00	81.36	123	100.00	18.64	660	100.00	
	HMDA & CRA - TOTAL	978	100.00	81.03	229	100.00	18.97	1,207	100.00	
Consumer										
5	Motor Vehicle	0	0.00	0.00	0	0.00	0.00	0	0.00	
6	Credit Card	0	0.00	0.00	0	0.00	0.00	0	0.00	
7	Other Secured	0	0.00	0.00	0	0.00	0.00	0	0.00	
8	Other Unsecured	0	0.00	0.00	0	0.00	0.00	0	0.00	
	Consumer - Total	0	0.00	0.00	0	0.00	0.00	0	0.00	
Other Data										
90	Community Dev	7		100.00	0		0.00	7	100.00	
80	Consortium/3rd Party	0		0.00	0		0.00	0	0.00	
3	Other Lines/Loans.	0		0.00	0		0.00	0	0.00	
9	Other Loan Data	0		0.00	0		0.00	0	0.00	

Report Filter: DATE RANGE: 1/1/2024 - 12/31/2024; ACTION TAKEN: 1-Loan Originated and 6-Loan Purchased

Examiners evaluate the organization on its ability to service the credit needs of the communities in its Assessment Area(s) (If there is more than one Assessment Area, then all Assessment Areas should be combined when running this report). Both the number of loans and their corresponding dollar volumes are taken into consideration. Examiners expect to see the majority of loans originated inside the combined Assessment Area. The tables contained within this document detail both the count and dollar amount of loans made inside and outside of the Assessment Areas. The inside Loan Type value is then rated based on the color scheme shown on the bottom of this report. No official benchmarks have been published that correlate these percentages with your performance ratings. The percentages used in this report emulate examiner practice as identified in historical performance evaluations.

CRA: Assessment Area Concentration
Lending Test 1

All Combined Assessment Areas

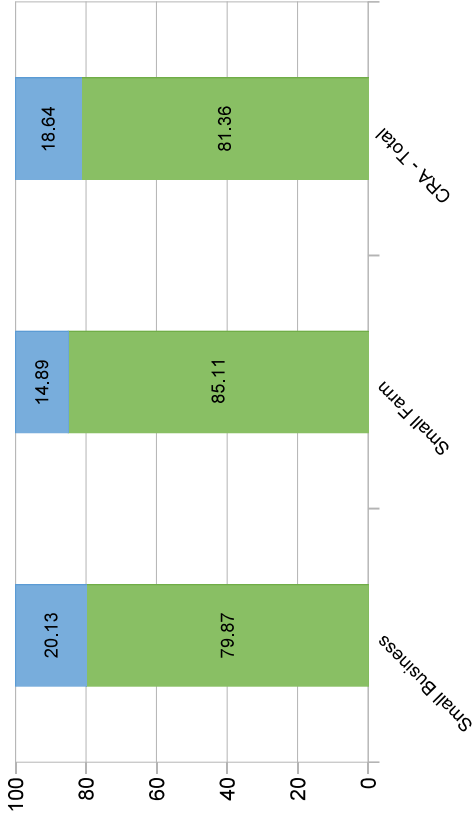
CITIZENS BANK

2024

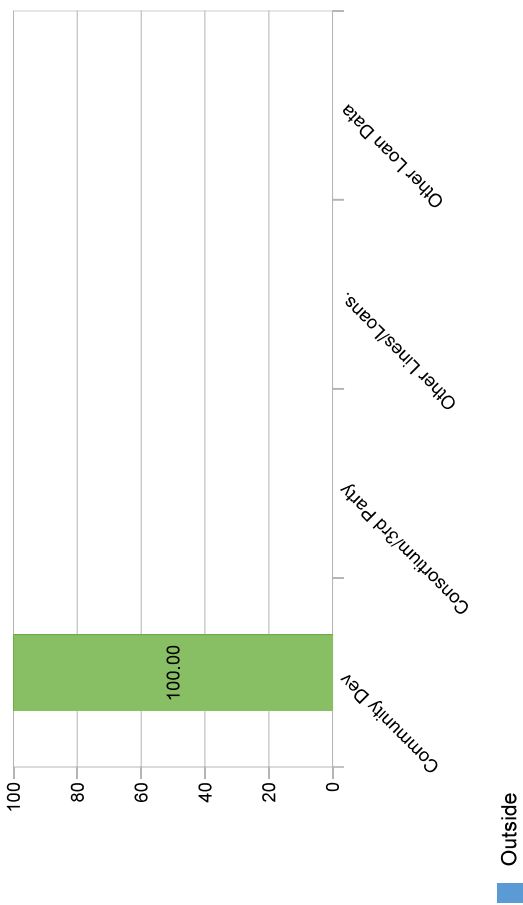
Reporting Period: 1/1/2024 to 12/31/2024
Last Action Date: 12/31/2024

Report Filters: Filter details at End of Report

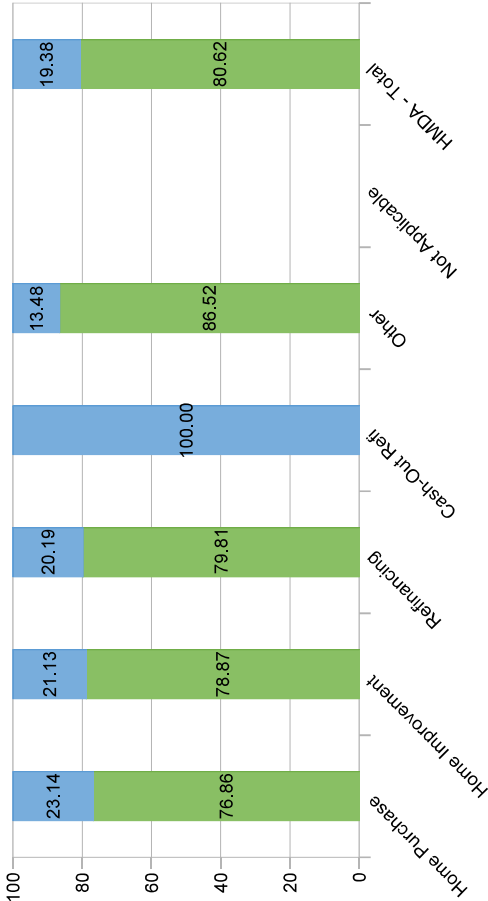
CRA Loans



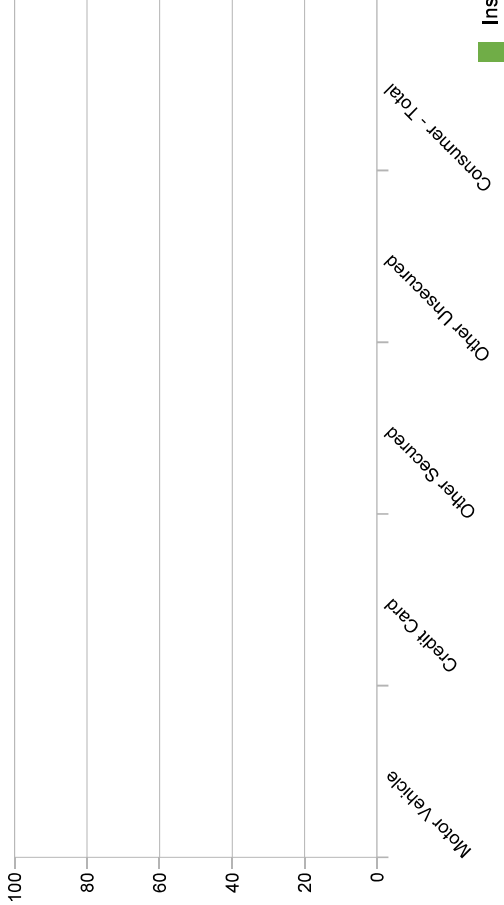
Other Data Loans



HMDA Loans



Consumer Loans



CRA: Assessment Area Concentration
Lending Test 1
All Combined Assessment Areas

CITIZENS BANK

2024

Reporting Period: 1/1/2024 to 12/31/2024
Last Action Date: 12/31/2024

Report Filters: Filter details at End of Report

Code	Loan Type	Inside Dollars			Outside Dollars			Total Dollars	
		\$ (000)	% Column	% Inside	\$ (000)	% Column	% Outside	\$ (000)	%
HMDA									
1	Home Purchase	24,260	33.15	71.57	9,635	37.21	28.43	33,895	34.21
2	Home Improvement	4,588	6.27	73.85	1,625	6.28	4.79	6,213	6.27
31	Refinancing	30,792	42.08	73.36	11,181	43.18	26.64	41,973	42.37
32	Cash-Out Refi	0	0.00	0.00	103	0.40	100.00	103	0.10
4	Other	13,539	18.50	80.18	3,347	12.93	19.82	16,886	17.04
5	Not Applicable	0	0.00	0.00	0	0.00	0.00	0	0.00
	HMDA - Total	73,179	100.00	73.87	25,891	100.00	26.13	99,070	100.00
CRA									
1	Small Business	37,646	77.61	71.75	14,824	90.94	28.25	52,470	80.96
2	Small Farm	10,863	22.39	88.04	1,476	9.06	11.96	12,339	19.04
	CRA - Total	48,509	100.00	74.85	16,300	100.00	25.15	64,809	100.00
	HMDA & CRA - TOTAL	121,688	100.00	74.25	42,191	100.00	25.75	163,879	100.00
Consumer									
5	Motor Vehicle	0	0.00	0.00	0	0.00	0.00	0	0.00
6	Credit Card	0	0.00	0.00	0	0.00	0.00	0	0.00
7	Other Secured	0	0.00	0.00	0	0.00	0.00	0	0.00
8	Other Unsecured	0	0.00	0.00	0	0.00	0.00	0	0.00
	Consumer - Total	0	0.00	0.00	0	0.00	0.00	0	0.00
Other Data									
90	Community Dev	8,270		100.00	0		0.00	8,270	100.00
80	Consortium/3rd Party	0		0.00	0		0.00	0	0.00
3	Other Lines/Loans.	0		0.00	0		0.00	0	0.00
9	Other Loan Data	0		0.00	0		0.00	0	0.00

Report Filter: DATE RANGE: 1/1/2024 - 12/31/2024; ACTION TAKEN: 1-Loan Originated and 6-Loan Purchased

CRA: Assessment Area Concentration
Lending Test 1

All Combined Assessment Areas

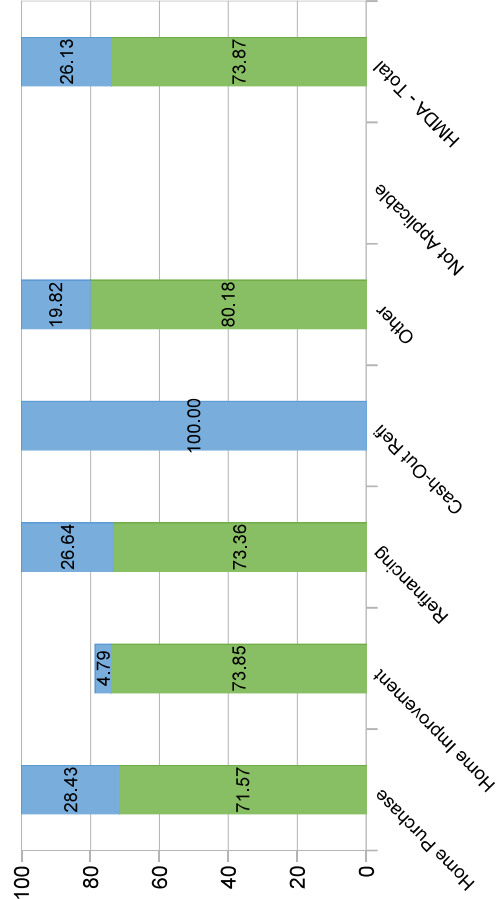
CITIZENS BANK

2024

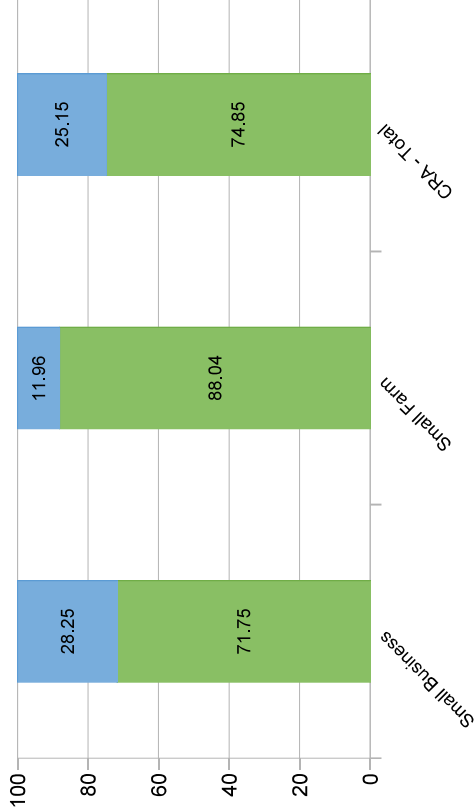
Reporting Period: 1/1/2024 to 12/31/2024
Last Action Date: 12/31/2024

Report Filters: Filter details at End of Report

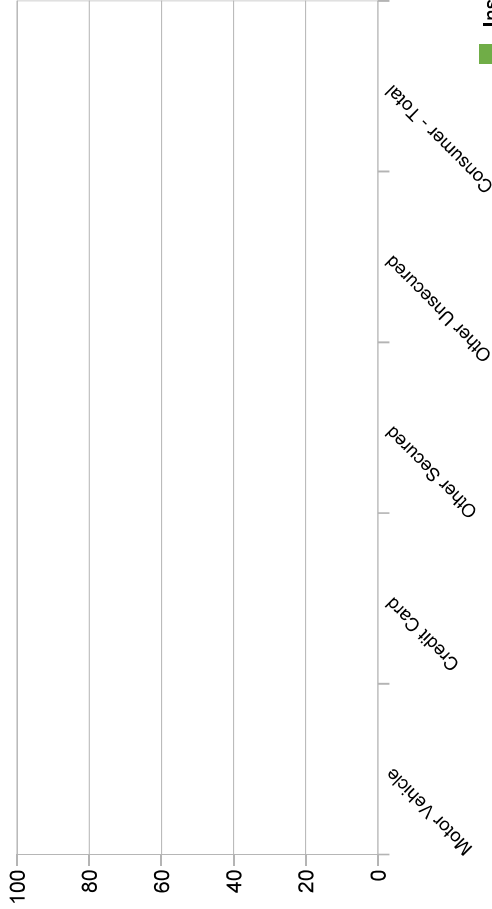
HMDA Dollars



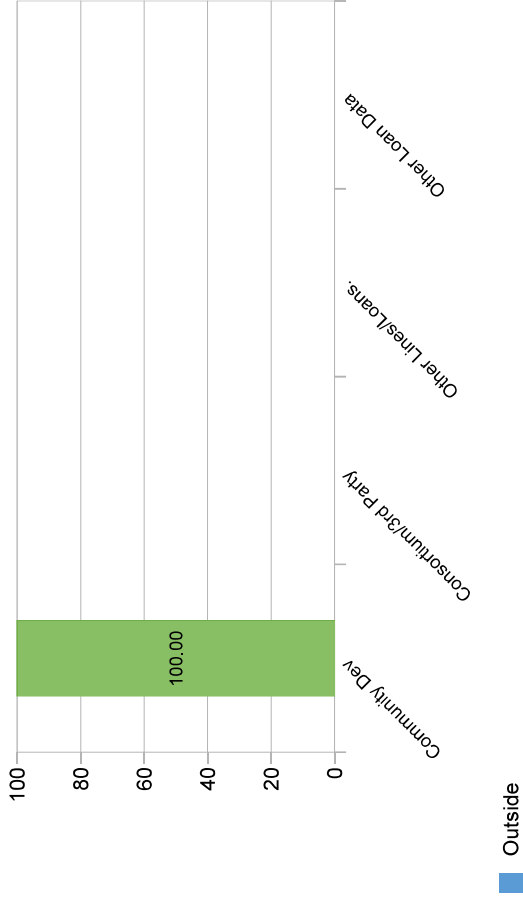
CRA Dollars



Consumer Dollars



Other Data Dollars



CRA: Assessment Area Penetration
LendingTest 3 - Tract Income Level

CITIZENS BANK

All Combined Assessment Areas

Reporting Period: 01/01/2024 to 12/31/2024
Last Action Date: 12/31/2024

Report Filters: Filter details at End of Report

Code	Loan Type	Low		Moderate		Middle		Upper		Unclassified		Total		LMI Combined	
		#	% Row	#	% Row	#	% Row	#	% Row	#	% Row	#	% Col	#	% Row
HMDA															
1	Home Purchase	6	6.45	22	23.66	55	59.14	10	10.75	0	0.00	93	21.09	28	30.11
2	Home Improvement	2	3.57	10	17.86	41	73.21	3	5.36	0	0.00	56	12.70	12	21.43
31	Refinancing	10	5.88	52	30.59	89	52.35	19	11.18	0	0.00	170	38.55	62	36.47
32	Cash-Out Refi.	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
4	Other	5	4.10	28	22.95	80	65.57	9	7.38	0	0.00	122	27.66	33	27.05
5	Not Applicable	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	HMDA - Total	23	5.22	112	25.40	265	60.09	41	9.30	0	0.00	441	100.00	135	30.61
CRA															
1	Small Business	19	5.04	106	28.12	224	59.42	28	7.43	0	0.00	377	70.20	125	33.16
2	Small Farm	4	2.50	47	29.38	104	65.00	5	3.13	0	0.00	160	29.80	51	31.87
	CRA - Total	23	4.28	153	28.49	328	61.08	33	6.15	0	0.00	537	100.00	176	32.77
	HMDA & CRA - Total	46	4.70	265	27.10	593	60.63	74	7.57	0	0.00	978	100.00	311	31.80
Consumer															
5	Motor Vehicle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
6	Credit Card	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
7	Other Secured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
8	Other Unsecured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	Consumer - Total	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Other Data															
90	Community Dev.	0	0.00	4	57.14	3	42.86	0	0.00	0	0.00	7	100.00	4	57.14
80	Consortium/3rd Party	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
3	Other Lines/Loans	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
9	Other Loan Data	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

Examiners evaluate the organization on its ability to service the credit needs of the communities in its Assessment Area(s). This table reflects the penetration of loans by Loan Purpose within the given Assessment Area(s). Typically, examiners focus on low and moderate income census tracts, comparing your data to the aggregate and to the percentage of owner-occupied units.

Report Filter: DATE RANGE: 01/01/2024 - 12/31/2024; ACTION TAKEN: 1-Loan Originated and 6-Loan Purchased

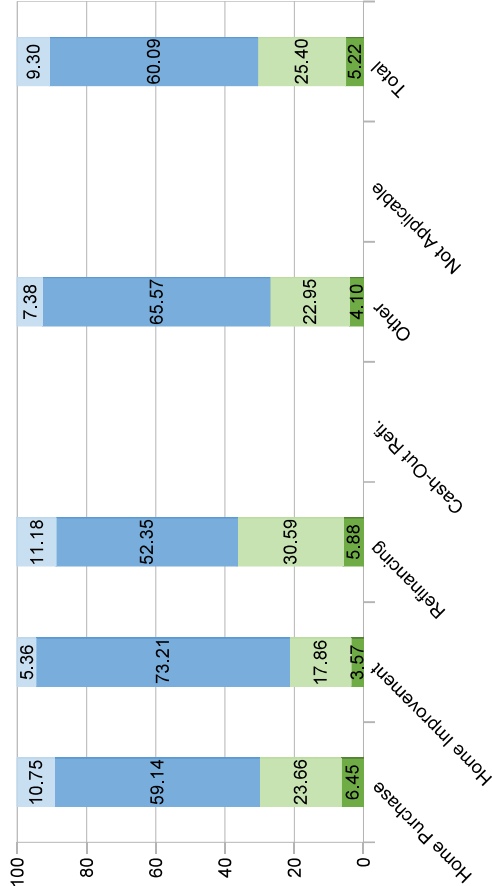
CRA: Assessment Area Penetration
LendingTest 3 - Tract Income Level

2024

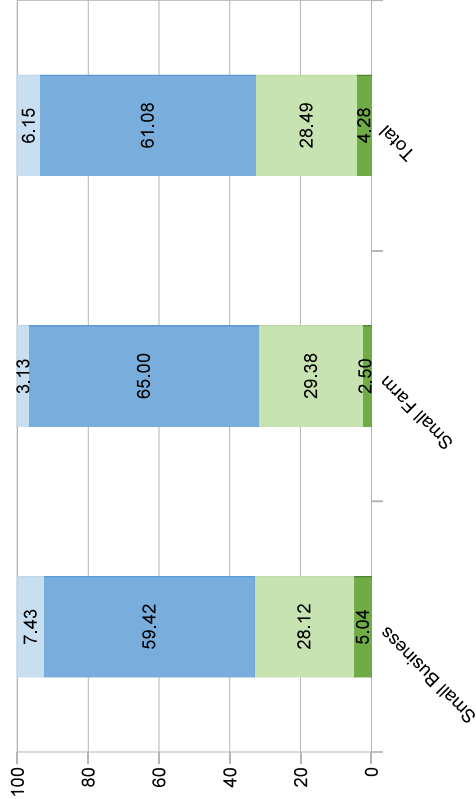
CITIZENS BANK All Combined Assessment Areas

Reporting Period: 01/01/2024 to 12/31/2024
Last Action Date: 12/31/2024
Report Filters: Filter details at End of Report

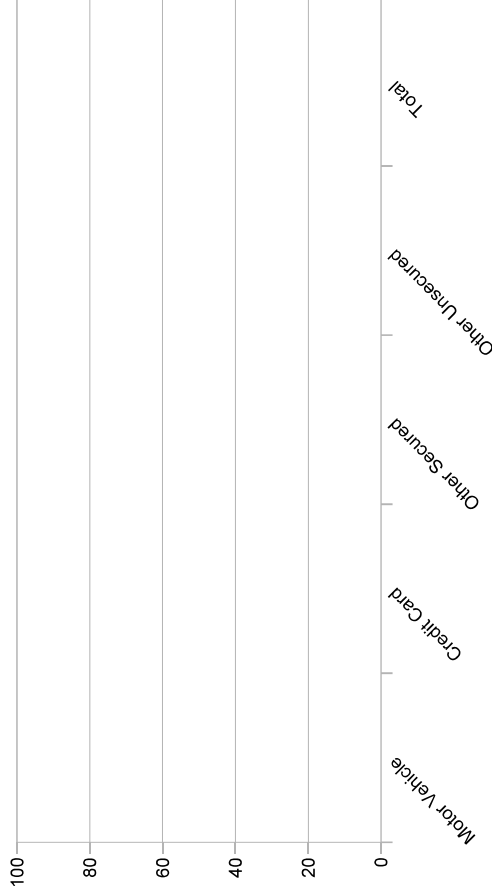
HMDA Loans



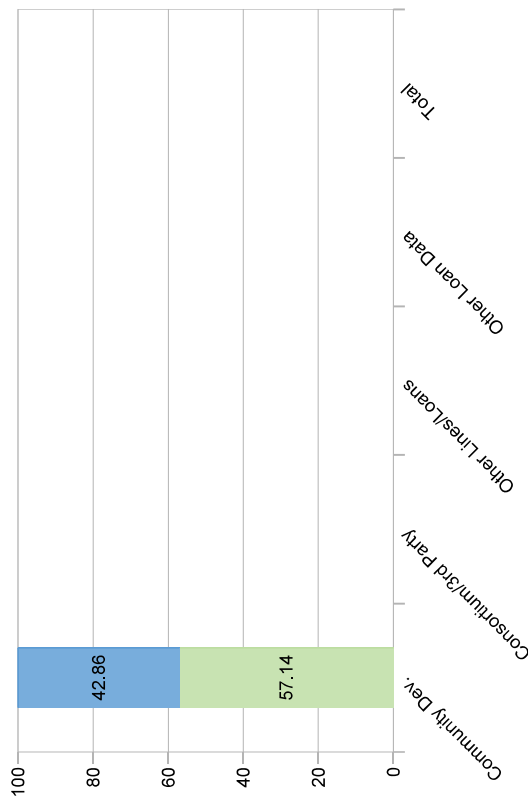
CRA Loans



Consumer Loans



Other Data Loans



Low Moderate Middle Upper Unclassified

CRA: Assessment Area Penetration
LendingTest 3 - Tract Income Level

CITIZENS BANK

All Combined Assessment Areas

Reporting Period: 01/01/2024 to 12/31/2024
Last Action Date: 12/31/2024

Report Filters: Filter details at End of Report

Code	Loan Type	Low		Moderate		Middle		Upper		Unclassified		Total		LMI Combined	
		\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Col	\$ (000)	% Row
HMDA															
1	Home Purchase	885	3.65	6,112	25.19	14,082	58.05	3,181	13.11	0	0.00	24,260	33.15	6,997	28.84
2	Home Improvement	140	3.05	925	20.16	2,908	63.38	615	13.40	0	0.00	4,588	6.27	1,065	23.21
31	Refinancing	3,285	10.67	10,056	32.66	12,782	41.51	4,669	15.16	0	0.00	30,792	42.08	13,341	43.33
32	Cash-Out Refi.	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
4	Other	477	3.52	2,984	22.04	8,902	65.75	1,176	8.69	0	0.00	13,539	18.50	3,461	25.56
5	Not Applicable	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	HMDA - Total	4,787	6.54	20,077	27.44	38,674	52.85	9,641	13.17	0	0.00	73,179	100.00	24,864	33.98
CRA															
1	Small Business	1,936	5.14	10,566	28.07	21,554	57.25	3,590	9.54	0	0.00	37,646	77.61	12,502	33.21
2	Small Farm	411	3.78	3,304	30.42	6,765	62.28	383	3.53	0	0.00	10,863	22.39	3,715	34.20
	CRA - Total	2,347	4.84	13,870	28.59	28,319	58.38	3,973	8.19	0	0.00	48,509	100.00	16,217	33.43
	HMDA & CRA - Total	7,134	5.86	33,947	27.90	66,993	55.05	13,614	11.19	0	0.00	121,688	100.00	41,081	33.76
Consumer															
5	Motor Vehicle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
6	Credit Card	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
7	Other Secured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
8	Other Unsecured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	Consumer - Total	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Other Data															
90	Community Dev.	0	0.00	7,400	89.48	870	10.52	0	0.00	0	0.00	8,270	100.00	7,400	89.48
80	Consortium/3rd Party	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
3	Other Lines/Loans	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
9	Other Loan Data	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

Report Filter: DATE RANGE: 01/01/2024 - 12/31/2024; ACTION TAKEN: 1-Loan Originated and 6-Loan Purchased

CRA: Assessment Area Penetration
LendingTest 3 - Tract Income Level

CITIZENS BANK

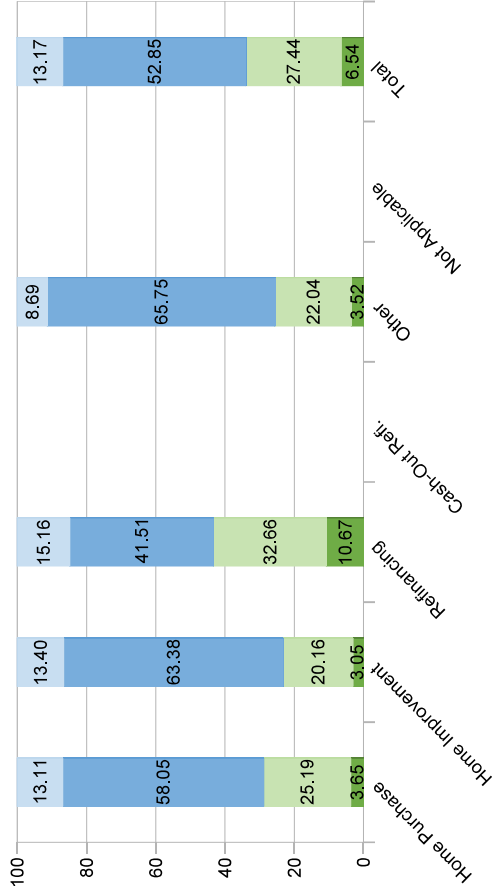
All Combined Assessment Areas

Reporting Period: 01/01/2024 to 12/31/2024
Last Action Date: 12/31/2024

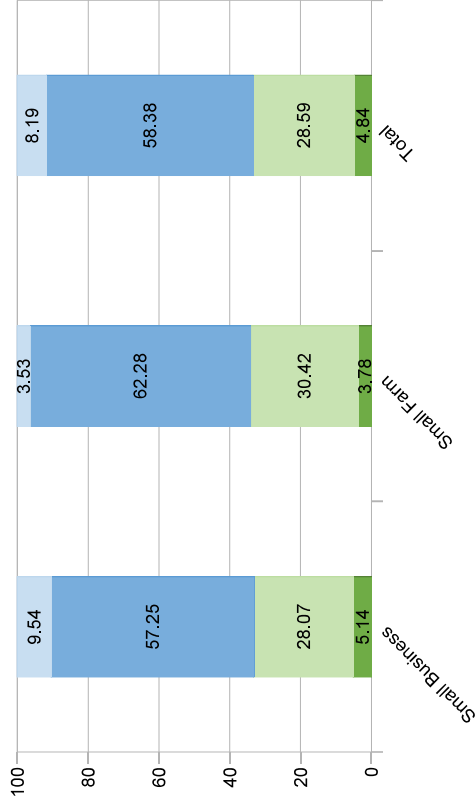
Report Filters: Filter details at End of Report

2024

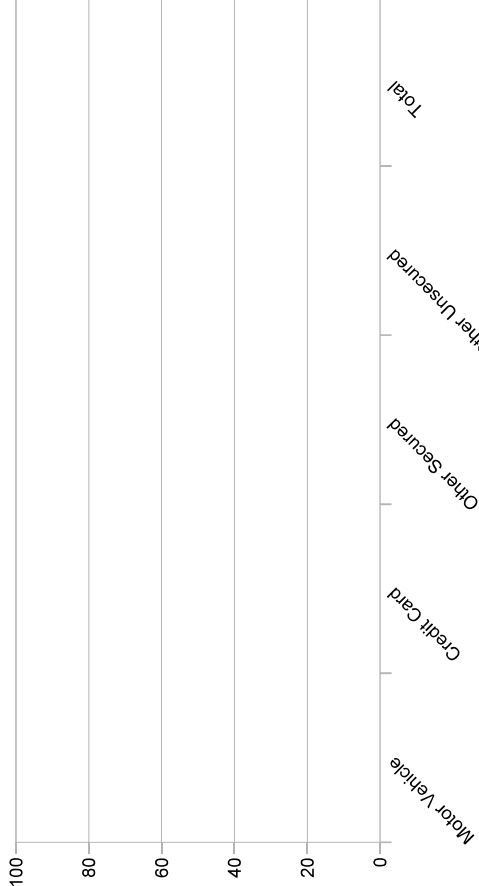
HMDA Dollars



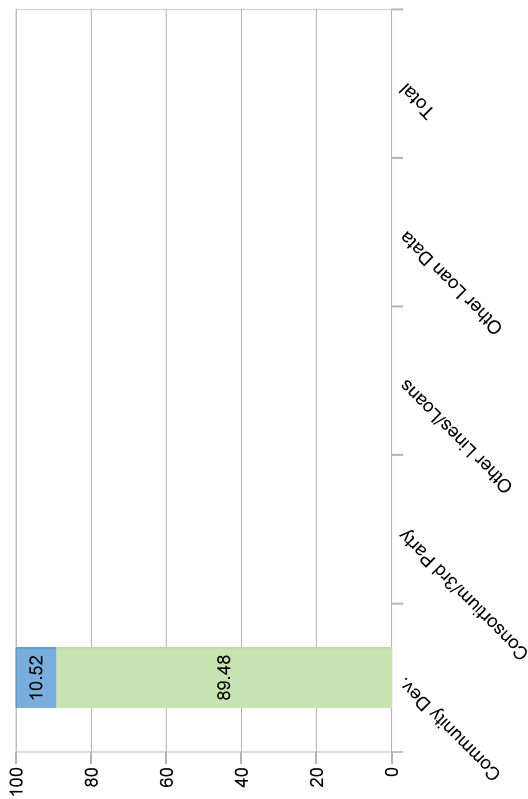
CRA Dollars



Consumer Dollars



Other Data Dollars



Low Moderate Upper Unclassified

CRA: Assessment Area
LendingTest 4 - Borrower Income Level
All Combined Assessment Areas

2024

Code	Loan Type	Low		Moderate		Middle		Upper		Unclassified		Total		LMI Combined	
		#	% Row	#	% Row	#	% Row	#	% Row	#	% Row	#	% Col	#	% Row
HMDA															
1	Home Purchase	4	4.30	12	12.90	21	22.58	49	52.69	7	7.53	93	21.09	16	17.20
2	Home Improvement	4	7.14	10	17.86	9	16.07	28	50.00	5	8.93	56	12.70	14	25.00
31	Refinancing	27	15.88	36	21.18	32	18.82	62	36.47	13	7.65	170	38.55	63	37.06
32	Cash-Out Refi	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
4	Other	13	10.66	21	17.21	29	23.77	57	46.72	2	1.64	122	27.66	34	27.87
5	Not Applicable	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	HMDA - Total	48	10.88	79	17.91	91	20.63	196	44.44	27	6.12	441	100.00	127	28.80
Consumer															
5	Motor Vehicle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
6	Credit Card	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
7	Other Secured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
8	Other Unsecured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	Consumer - Total	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Other															
3	Other Lines/Loans	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
9	Other Loan Data	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

Examiners evaluate the organization on its ability to service the credit needs of the communities in its Assessment Area(s). This table reflects the penetration of loans by Loan Purpose to the loan applicants based on the borrower's income level; making sure there is adequate penetration among borrower income levels. Typically, the examiners will focus on low and moderate income borrowers, comparing your data to the aggregate and to the percentage of families' data.

CRA: Assessment Area
LendingTest 4 - Borrower Income Level

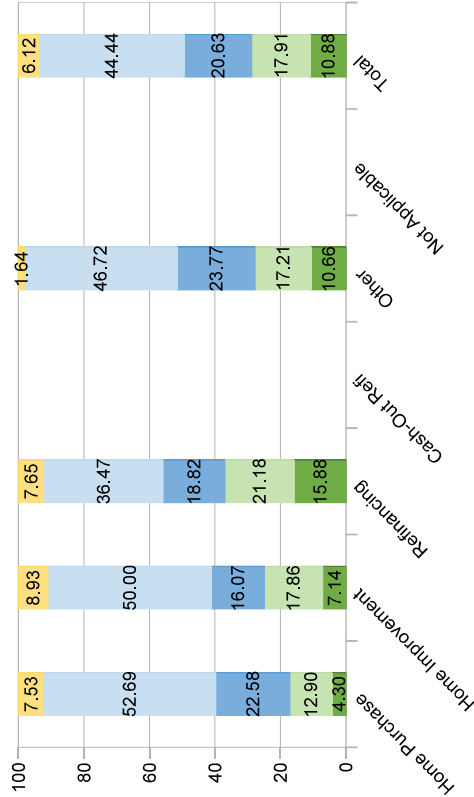
2024

CITIZENS BANK

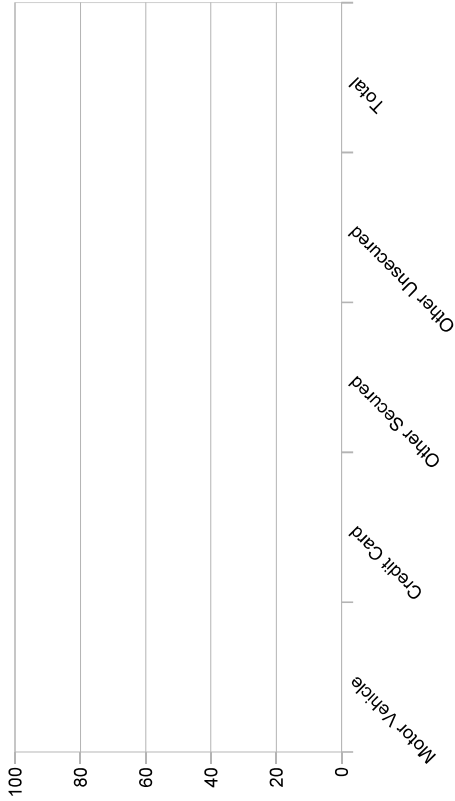
All Combined Assessment Areas

Reporting Period: 01/01/2024 to 12/31/2024
Last Action Date: 12/31/2024
Report Filters: Filter details at End of Report

HMDA Loans



Consumer Loans



Other Loans



CRA: Assessment Area
LendingTest 4 - Borrower Income Level

2024

CITIZENS BANK

All Combined Assessment Areas

Reporting Period: 01/01/2024 to 12/31/2024
Last Action Date: 12/31/2024

Report Filters: Filter details at End of Report

Code	Loan Type	Low		Moderate		Middle		Upper		Unclassified		Total		LMI Combined	
		\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row	\$ (000)	% Row
HMDA															
1	Home Purchase	262	1.08	2,181	8.99	3,476	14.33	13,241	54.58	5,100	21.02	24,260	33.15	2,443	10.07
2	Home Improvement	135	2.94	587	0.00	715	15.58	2,978	64.91	173	3.77	4,588	6.27	722	15.74
31	Refinancing	1,927	6.26	3,142	10.20	4,718	15.32	14,644	47.56	6,361	20.66	30,792	42.08	5,069	16.46
32	Cash-Out Refi	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
4	Other	730	5.39	2,007	14.82	2,610	19.28	8,100	59.83	92	0.68	13,539	18.50	2,737	20.22
5	Not Applicable	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	HMDA - Total	3,054	4.17	7,917	10.82	11,519	15.74	38,963	53.24	11,726	16.02	73,179	100.00	10,971	14.99
Consumer															
5	Motor Vehicle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
6	Credit Card	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
7	Other Secured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
8	Other Unsecured	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	Consumer - Total	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Other															
3	Other Lines/Loans	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
9	Other Loan Data	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00

CRA: Assessment Area
LendingTest 4 - Borrower Income Level

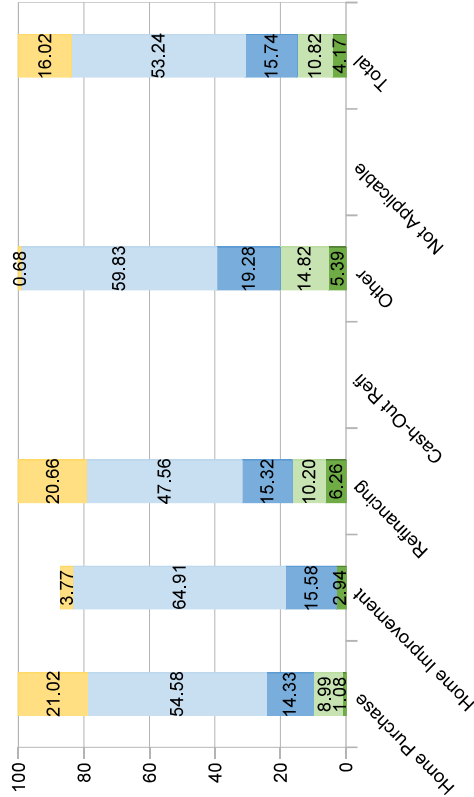
2024

CITIZENS BANK

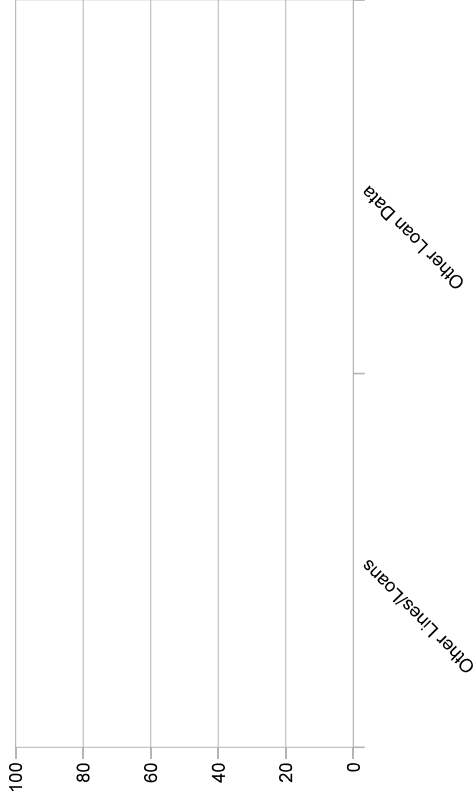
All Combined Assessment Areas

Reporting Period: 01/01/2024 to 12/31/2024
Last Action Date: 12/31/2024
Report Filters: Filter details at End of Report

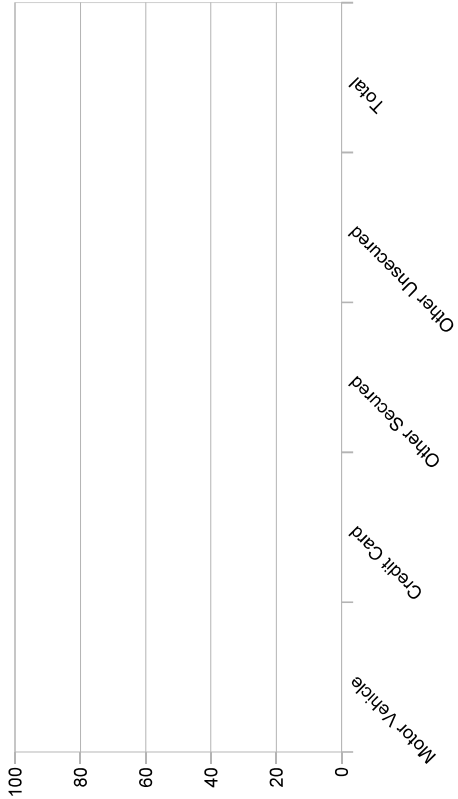
HMDA Dollars



Consumer Dollars



Consumer Dollars



Low Moderate Upper Unclassified