



CRA
Public File

CRA Policy

CITIZENS BANK OF AMERICUS
COMMUNITY REINVESTMENT ACT (CRA)

INTRODUCTION

The Board of Directors of Citizens Bank of Americus does hereby issue this statement and resolution in conformance with the Community Reinvestment Act of 1977.

Citizens Bank of Americus is a bank with assets of \$435,000,000.00 having two banking locations in the county of Sumter, and one in the county of Webster. Our primary objectives are to maintain public confidence and to continue our reputation as a sound financial institution. In order to meet these objectives, we must maintain a reasonably conservative lending policy. At the same time, we desire to lend to all qualified segments of the population and to help meet the needs of the communities in which we are located. This will include low- and moderate-income neighborhoods. No area of the counties we serve will be excluded. Loans must be consistent with sound bank lending policies; however, this bank does not and will not discriminate against any individual on the basis of race, color, religion, national origin, sex, marital status, or age.

The management of Citizens Bank of Americus will be involved in the communities served by Citizens Bank so that we can keep in touch with the needs of our communities. Our Marketing Department will advertise in an effort to reach all segments of the market. We will extend credit to any individual, partnership, or corporation that can meet our normal credit standards on a short-term or an intermediate term basis for any legitimate purpose. The principal types of loans we will offer to the communities in which we are located are as follows:

A. Consumer Loans

1. Automobile Loans
2. Marine Loans
3. Consolidation Loans
4. Airplane Loans
5. Signature Loans
6. Other Personal Purpose Loans

B. Commercial Loans

1. Accounts Receivable Financing
2. Inventory Financing
3. Airplane Loans
4. Automobile Loans
5. Equipment Loans
6. Agricultural Loans
7. Small Business Administration Guaranteed Loans
8. Farmers Home Administration Guaranteed Loans
9. Other Business Purpose Loans
10. Working Capital Loans
11. Crop Production loans

C. **Real Estate Loans**

1. Consumer Construction Loans
2. Commercial Construction Loans
3. Home Improvement Loans
4. Real Estate Acquisition Loans
5. Real Estate Development Loans
6. Permanent Mortgage Loans (Residential & Commercial)
7. Home Equity Line-of-Credit Loans
8. Timber & Farmland loans
9. Multi-Family Loans

Citizens Bank of Americus works closely with the Americus and Sumter County Chamber of Commerce and the Americus and Sumter County Payroll Development Authority to ascertain and meet many of the credit needs of its local community.

I. **Purpose**

The fundamental premise of the CRA is that banks and thrifts have a continuing and affirmative obligation to help meet the credit needs of the communities in which they are chartered. The primary purpose of the CRA and the implementing regulation for state-chartered, non-member banks, FDIC Regulations Part 345, is to require the FDIC and the other federal financial supervisory agencies to assess an institution's record of helping to meet local credit needs, particularly the needs of low- and moderate-income neighborhoods; and to consider this record in evaluating an institution's "application for a deposit facility".

II. **Important Definitions**

- ◆ **Assessment Area** - The geographic area or areas delineated by the Bank in which it makes a substantial majority of its loans, i.e., the effective lending territory. The assessment area should be comprised of whole "geographies".
- ◆ **Community Development** - includes the following activities:
 - Affordable housing for low- or moderate-income ("LMI") individuals, and includes multifamily rental housing;
 - Community services targeted to LMI individuals, such as:
 - Activities that promote community welfare, such as community-based child care, education, health; and social services targeted towards LMI persons.
 - Activities that promote economic development by providing financing to businesses with gross annual revenues of \$1 million or less or farms with gross annual revenues of \$500 thousand or less;
 - Activities that stabilize/revitalize LMI areas, designated disaster areas, or distressed or underserved non-metropolitan middle-income areas designated by the federal banking agencies.

- ◆ **Community Development Loan** - Examples of community development loans:
 - Loans to local/state governments for community development;
 - Loans to non-profits designed to serve LMI individuals or LMI housing;
 - Loans for affordable housing rehabilitation and construction;
 - Loans to finance environmental clean-up or redevelopment of an industrial site to revitalize the LMI area in which the property is located;
 - Loans to financial intermediaries (i.e., CDC) that primarily lend or facilitate lending in LMI areas or to LMI individuals.

- ◆ **Community Development Service** - A service that has as its primary purpose community development and *is related to the provision of financial services*. Examples include:
 - Serving on the board of directors of an organization that promotes credit availability or affordable housing;
 - Providing technical assistance to financial intermediaries that help meet the credit needs of LMI individuals or small business or farms;
 - School savings programs;
 - Providing financial services with the primary purpose of community development (i.e., low cost or free government check cashing);
 - “Loaning” bank employees or executives to organizations that facilitate affordable housing construction/rehabilitation or development of affordable housing;
 - Providing credit, homebuyer, and/or home maintenance counseling, and/or financial planning to promote community development and affordable housing;
 - Providing technical expertise for non-profit or government organizations serving LMI housing needs or economic revitalization and development.

- ◆ **CRA Assessment Standards** - The FDIC must assess the Bank’s record of performance in helping to meet the credit needs of the community. Current CRA regulations set forth 2 Assessment Standard for Intermediate Small Banks:
 - ✓ **Lending Test** - Emphasis is placed on the Bank’s record of origination and/or purchasing various types of loans within the assessment area(s). Loan volume and geographic distribution of HMDA loans and small business, small farm and community development lending are evaluated. Consumer loan volume may be evaluated at the bank’s option, or if the FDIC examiner concludes that consumer lending represents a significant portion of the bank’s total loan assets.

- ✓ **Community Development Test** - Community development loans, community development services, and qualified investments are reviewed to determine an institution's level of involvement in community development activities.
- ◆ **CRA Ratings** - Based on the examination findings, Banks are assigned a rating of:
 - ✓ Outstanding
 - ✓ Satisfactory
 - ✓ Needs to Improve
 - ✓ Substantial Noncompliance
- ◆ **Geography** - A census tract.
- ◆ **HMDA Loan** - Any loan subject to the Home Mortgage Disclosure Act is considered a "HMDA loan" under CRA.
- ◆ **Income Levels** - The income standards used to analyze the distribution of lending activities by geography and borrowers' income.
 - **Low-Income** - Median family income (MFI) is less than 50% of the area MFI;**
 - **Moderate-Income** – MFI is at least 50% and less than 80% of the area MFI;**
 - **Middle-Income** – MFI is at least 80% and less than 120% of the area MFI;**
 - **Upper-Income** - MFI is 120% or more of the area MFI.**

** If the loan is located in a Metropolitan Statistical Area ("MSA"), the MSA median family income is used.

If the loan is located in a non-MSA area, the statewide, nonmetropolitan median family income is used.
- ◆ **Loan Location** - depends on the type of loan as follows:
 - A HMDA loan is located in the census tract in which the security property is located or in which loan proceeds will be used.
 - A small business, small farm, or community development loan is located in the census tract where the main facility or farm is located or where the loan proceeds will be applied as indicated by the borrower.
 - A consumer loan is located in the census tract where the borrower resides.
- ◆ **MSA** - means the Metropolitan Statistical Area as defined by the U.S. Office of Management and Budget.
- ◆ **Qualified Investment** - is an investment, membership share or grant that has community development as its primary purpose. Examples include investments, grants, or shares:

- In organizations promoting economic development by financing small businesses;
 - In organizations engaged in affordable housing rehabilitation, renovation or construction, including multifamily rental housing;
 - In or to financial intermediaries that primarily lend or facilitate lending in LMI areas or to LMI individuals;
 - To support or develop facilities that promote community development in LMI areas or for LMI individuals, e.g., educational or day care facilities;
 - In projects eligible for low-income housing tax credits;
 - In state or municipal obligations that specifically support affordable housing or other community development projects;
 - To non-profit organizations serving LMI housing or other community development needs (i.e., homeownership, home maintenance, or credit counseling);
 - In or to organizations supporting activities essential to the capacity of LMI individuals or areas to use credit or sustain economic development.
- ◆ **Small Business Loan** - Business loan of \$1 million or less.
 - ◆ **Small Farm Loan** - Agricultural loan of \$500,000 or less.

Note: “Small” business/ “small” farm refers to the size of the loan, not to the size of the business.

III. **Enforcement/Penalties**

- ◆ **Regulatory Action on Corporate Applications** - The FDIC may disapprove, delay action, or place conditions on applications for mergers, acquisitions and branches, if the Bank’s CRA performance is less than “Satisfactory”.
- ◆ **Other Risks** - Community group protests may lead to negative publicity. These can be costly to defend if the Bank has not sufficiently documented its CRA performance record. Adverse publicity may also result from public disclosure of the FDIC’s narrative summary and adverse rating of the Bank’s CRA performance record.

IV. **Policy**

It shall be the Bank's policy to comply with the statutory provisions of the CRA and the requirements of FDIC Regulations Part 345 as they apply to an "Intermediate Small Bank". To ensure compliance with this policy, the following actions will be taken:

A. Collect and report all required data

As an "Intermediate Small Bank", **Citizens Bank of Americus** is NOT required to collect and report data on "CRA loans", i.e., small business, small farm, and community development loans.

HOWEVER, *it is the policy of the Bank to collect and track, including dollar volume and number, community development loans, community development services, and qualified investments. It is the CRA Officer's responsibility to maintain current information on ALL community development activities.*

B. Make publicly available all required notices and disclosures

◆ **CRA Notice** - describes how the public may communicate with the Bank or the FDIC regarding efforts to help meet the credit needs of its assessment areas. The language in the Main Office Notice differs slightly from the language in the Branch Office Notice.

◆ **CRA Public File** - contains specific information that is available upon request.

□ *Main Office Public File* must contain:

- All signed, written comments received from the public for the current year and the prior 2 calendar years that relate to the Bank's performance in helping to meet community credit needs; AND any responses by the Bank to these comments;
- A list of branches, including street addresses and census tracts;
- A list of branches opened or closed during the current year and each of the prior 2 calendar years, including the street addresses and census tracts;
- A list of products and services offered at branches, including loan and deposit products, hours of operations and fees charged for these products.
- A map of each assessment area, including all census tracts within the area;
- The Bank's loan-to-deposit ratio for each calendar quarter since the date of the most recent CRA performance evaluation prepared by the FDIC; and
- Following an examination by the FDIC, a copy of the CRA Performance will be placed in the CRA Public File.

□ *Branch Office Public File* must contain:

- A copy of the Bank's most recent CRA Performance Evaluation; and
- A list of services provided at the branch.

V. Periodic Review of CRA Program

The CRA Officer is responsible for maintaining the CRA Public File and ensuring that CRA Notices are posted in conspicuous locations in the Main Office and each branch office.

Information required to be included in the Bank's CRA Public File will be updated annually no later than April 1 of each year.

At least annually, an assessment of the Bank's CRA performance will be conducted; and an evaluation of compliance with the substantive and technical provisions of the CRA will be completed. The assessment may be conducted by an independent party or by the Bank's Compliance Officer or other knowledgeable party. Findings will be discussed with Senior Management and presented in writing to the Board of Directors.

2/4/22

Written comments
received from the
public

Branch List

Hours of Operation

ATM Locations

Products & Services

Schedule of Charges

OFFICE LOCATIONS:

Main Office

119 N. Lee St.
Americus, GA 31709
ATM - Deposit taking
County: Sumter
Census Tract: 9506

Tripp Street Branch

106 Tripp St.
Americus, GA 31709
ATM - Deposit taking
County: Sumter
Census Tract: 9507

Preston Branch

534 Washington St.
Preston, GA 31824
County: Webster
Census Tract: 9601

ATM LOCATIONS:

Main Office

119 N. Lee St.

Americus, GA 31709

Available service: Deposits & Withdrawals

Tripp Street Branch

106 Tripp St.

Americus, GA 31709

Available service: Deposits & Withdrawals

HOURS OF OPERATION:

Main Office

Lobby:	Monday-Thursday	9:00 am - 4:00 pm
	Friday	9:00 am - 5:00 pm

Drive-in:	Monday-Thursday	8:30 am - 5:00 pm
	Friday	8:30 am - 6:00 pm
	Saturday	8:30 am - 12:30 pm

Tripp Street Branch

Lobby:	Monday-Thursday	9:00 am - 4:00 pm
	Friday	9:00 am - 5:00 pm

Drive-in:	Monday-Thursday	8:30 am - 5:00 pm
	Friday	8:30 am - 6:00 pm

Preston Branch

Lobby:	Monday-Thursday	9:00 am - 2:00 pm
	Friday	9:00 am - 2:00 pm
		3:00 pm - 5:00 pm

Other Services & Charges

ATM/Debit Card Replacement	\$10
Bill Pay thru Online Banking*	\$4.75
Charge-Back Fee (per check)	\$5
Closing Fee (within 6 months of opening - checking or savings)	\$25
Collection Item (per item) \$1,000 or more	\$25
Collection Item (per item) up to \$999.99	\$10
Copies (per page)	\$5.50
Dormant Account Fee (per month - max \$60)**	\$5
Fax	\$2
Gainishment Processing (Bank legal fee recovery)	\$75
Medallion Stamp (Bank customers only)	\$25
Night Deposit Bag (per year) - 1st bag	\$20
Night Deposit Bag (per year) - Additional bag	\$10
Non-Citizens Bank ATM Withdrawal (per withdrawal)	\$95
Official Check	\$6
Overdraft Item/Returned Item (per item)***	\$30
Record Research (per hour)	\$25
Record Research (per item)	\$2
Record Retrieval (per statement)	\$5
Safe Deposit Box - Extra Large (per year)	\$50
Safe Deposit Box - Large (per year)	\$40
Safe Deposit Box - Medium (per year)	\$35
Safe Deposit Box - Small (per year)	\$25
Statements on CD - Annual (one-time charge)	\$75
Statements on CD - Monthly (per month)	\$15
Stop Payment Request (per item)	\$25
Wire Transfer - Domestic Outgoing	\$25
Wire Transfer - Domestic/International Incoming	\$10
Wire Transfer - International Outgoing	\$50

*Bill Pay thru Online Banking is \$4.75 per month, which includes the first 10 transactions, and \$.40 for each additional transaction.

**A Checking Account is dormant if, for 365 days (1 year), you have made no deposits or withdrawals to the account. A Savings Account and Time Deposit are dormant if, for five (5) years, you have made no deposits or withdrawals to the account.

***Overdraft Item fee is charged when an item is paid. Returned Item fee is charged when an item is returned and is assessed each time a check is re-presented for payment and returned. These fees apply to overdrafts created by check, in-person withdrawal, or other electronic means (except ATM withdrawals and one-time POS transactions)

Locations & Hours



MAIN OFFICE
119 N. Lee St. · 229.924.4011

Lobby Hours

Monday-Thursdays	9:00am - 4:00pm
Friday	9:00am - 5:00pm

Drive-Thru Hours

Monday-Thursdays	8:30am - 5:00pm
Friday	8:30am - 6:00pm
Saturday	9:00am - 1:00pm



TRIPP ST. BRANCH
106 Tripp St. · 229.924.4011

Lobby Hours

Monday-Thursdays	9:00am - 4:00pm
Friday	9:00am - 5:00pm

Drive-Thru Hours

Monday-Thursdays	8:30am - 5:00pm
Friday	8:30am - 6:00pm

PRESTON BRANCH
534 Washington St. · 229.828.3325

Lobby Hours

Monday-Thursdays	9:00am - 3:00pm
Friday	9:00am - 2:00pm
	3:00pm - 5:00pm



Consumer Products & Schedule of Charges

Effective September 1, 2020

cbkamericus.com



BASIC CHECKING

Low or no cost account with basic benefits

Sign up for e-statements & we'll waive the \$4.75 monthly service charge; no minimum balance
\$100 deposit required to open account
Free online banking & mobile banking
Free no-monthly-fee debit card

SENIOR CHECKING

Interest bearing - For individuals 60+ years of age

Keep \$100 minimum daily balance & we'll waive the \$4.75 monthly service charge
\$100 deposit required to open account
Interest earned on daily collected balance of \$1,000 or more
Free wallet-style checks
50% discount on Safe Deposit Box
Free online banking & mobile banking
Free no-monthly-fee debit card

PREMIER CHECKING

Interest bearing - Premier benefits

\$20 monthly service charge
Service charge waived with a \$3,500 minimum daily balance, or \$10,000 combined daily balance in any checking, money market, savings, CDs, or IRAs
\$100 deposit required to open account
Interest earned on daily collected balance of \$1,000 or more
Free wallet-style checks or 50% off designer-style checks
Free 3x5 Safe Deposit Box or \$15 credit towards larger box
Free Bill Pay provided with online banking
Free online banking & mobile banking
Free no-monthly-fee debit card

SECURE CHECKING

Security & Savings Benefits

\$4.75 monthly service charge; no minimum balance
\$100 deposit required to open account
IDProtect® - Identity Theft Protection Service* (some benefits require registration/activation. See separate brochure for additional details regarding the benefits of IDProtect®)
Up to \$10,000 24-hour Accidental Death & Dismemberment Insurance**
Cellular Telephone Protection**
Debit Advantage™ Buyer's Protection & Extended Warranty**
Travel & Entertainment Discount Membership (Registration & enrollment required.)
Health Discount Savings*** (Registration & activation required. This is NOT insurance.)
Free online banking & mobile banking
Free no-monthly-fee debit card

SECURE CHECKING PLUS

Security & Savings Benefits + Overdraft Protection

\$10 monthly service charge; no minimum balance
\$100 deposit required to open account
Overdraft Protection available (with approved credit)
IDProtect® - Identity Theft Protection Service* (some benefits require registration/activation. See separate brochure for additional details regarding the benefits of IDProtect®)
Up to \$10,000 24-hour Accidental Death & Dismemberment Insurance**
Cellular Telephone Protection**
Debit Advantage™ Buyer's Protection & Extended Warranty**
Travel & Entertainment Discount Membership (Registration & enrollment required.)
Health Discount Savings*** (Registration & activation required. This is NOT insurance.)
Free online banking & mobile banking
Free no-monthly-fee debit card

SAVINGS ACCOUNT

Keep \$100 minimum daily balance & we'll waive the \$9 quarterly service charge
\$100 deposit required to open account
Accrues interest on the daily collected balance
Allows for 6 withdrawals per quarterly statement; \$3 excessive debit charge for each withdrawal in excess of 6
Free online banking & mobile banking

MONEY MARKET ACCOUNT

Keep \$1,000 minimum daily balance & we'll waive the \$10 monthly service charge
\$1,000 deposit required to open account
Accrues interest on the daily collected balance of \$1,000 or more
If balance falls below \$1,000 minimum, the account will earn interest at the checking account interest rate for each day it is below the minimum
Allows for 6 pre-authorized, third-party, or telephone withdrawals per monthly statement; \$10 for each item in excess of 6
Free online banking & mobile banking

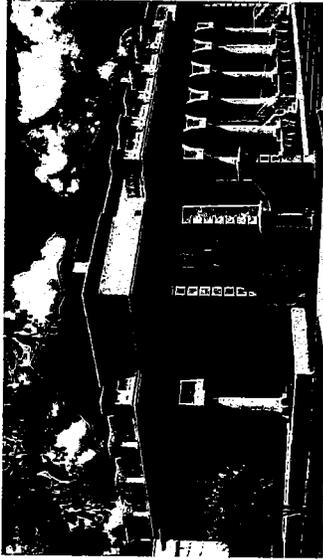
* IDProtect® service is a personal identity theft protection service available to account owner(s) and their family. Family includes: Spouse, persons qualifying as domestic partner, & children under 25 years of age & parent(s) who are residents of the same household.

** Special Insurance Program Notes: The descriptions herein are summaries only. They do not include all terms, conditions & exclusions of the policies described. Please refer to the actual policies for complete details of coverage & exclusions. Insurance is offered through the company named on the certificate of insurance/guide to benefits.

*** Benefits of Secure Checking and Secure Checking Plus are available to joint account holders (unless otherwise noted). Benefits are not available to a "signer" or "beneficiary" of the account who is not an account owner, businesses and their employees, clubs and/or churches and their members, schools and their employees/students.



**3 Convenient Locations
to Serve You!**



MAIN OFFICE 
119 N. Lee St. • 229-924-4011

Lobby Hours

Monday - Thursday 9:00 AM - 4:00 PM
Friday 9:00 AM - 5:00 PM

Drive-In Hours

Monday - Thursday 8:30 AM - 5:00 PM
Friday 8:30 AM - 6:00 PM
Saturday 9:00 AM - 1:00 PM

TRIPP STREET BRANCH 
106 Tripp St. • 229-924-4011

Lobby Hours

Monday - Thursday 9:00 AM - 4:00 PM
Friday 9:00 AM - 5:00 PM

Drive-In Hours

Monday - Thursday 8:30 AM - 5:00 PM
Friday 8:30 AM - 6:00 PM

PRESTON BRANCH

534 Washington St. • 229-828-3325

Monday - Thursday 9:00 AM - 3:00 PM
Friday 9:00 AM - 2:00 PM
3:00 PM - 5:00 PM

**24 HOURS A DAY,
7 DAYS A WEEK**

Online Banking

www.cbkamericus.com

Mobile Banking

Download "CBOA Mobile"
from your App Store:



App Store



Google play

- View Account Balances
- View Transaction History
- View Statements
- Transfer Funds
- Pay Bills
- Manage Debit Card
- Remote Deposit: Anywhere
(application required)

CBA Bankline

229-924-BANK (2265)



**CITIZENS BANK
OF AMERICUS**

229-924-4011

www.cbkamericus.com



**Business
Checking/Savings
Products
and
Schedule
of
Charges**

Effective: December 2017



**CITIZENS BANK
OF AMERICUS**

Where business and friendship meet.

Serving Our Community Since 1937
"Locally Owned and Operated"

Member FDIC

BUSINESS ACCOUNTS

Customized solutions for you.

BUSINESS CHECKING ACCOUNT

- Economical account perfect for any size business, from small to large
- \$1,000 minimum daily balance incurs no service charge
- When the balance falls below \$1,000 - \$10 per month plus \$.30 per debit
- Interest is assessed on overdraft balances after 2 days¹
- Unlimited number of checks may be written
- \$100 deposit required to open an account

BUSINESS INTEREST ACCOUNT

- Perfect for businesses with large balances and low to moderate account activity
- \$1,000 minimum daily balance incurs no service charge
- When the balance falls below \$1,000 - \$10 per month
- Interest is earned on daily collected balance
- Interest is assessed on overdraft balances after 2 days¹
- Unlimited number of checks may be written
- \$500 deposit required to open an account

BUSINESS NOW ACCOUNT

- Offered to specific types of businesses such as non-profit organizations, government accounts, or IOLTA accounts
- \$1,000 minimum daily balance incurs no service charge
- When the balance falls below \$1,000 - \$10 per month
- Interest is earned on daily collected balance
- Interest is assessed on overdraft balances after 2 days¹
- Unlimited number of checks may be written
- \$500 deposit required to open an account

MSB ACCOUNT

- Money Service Business (MSB) Accounts are provided to retail businesses that offer check cashing and other financial services
- \$25 monthly service charge; No minimum balance
- \$.65 charge per \$1000 cash deposited or withdrawn
- \$.10 charge per item for electronic debits or credits
- Earnings credit on collected balances to offset monthly service charge
- Interest is assessed on overdraft balances after 2 days¹
- Unlimited number of checks may be written
- \$100 deposit required to open an account

CITIZENS SAVINGS ACCOUNT

- \$100 minimum daily balance incurs no service charge
- When the balance falls below \$100: \$9 service charge per quarterly statement period
- Allows for six withdrawals per statement; \$3 for each withdrawal in excess of six
- Statements are provided quarterly
- \$100 deposit required to open an account

CITIZENS MONEY MARKET ACCOUNT

- \$1,000 minimum daily balance incurs no service charge
- When the balance falls below \$1,000: \$10 monthly service charge
- Accrues interest at CBA's money market rate on a daily collected balance of \$1,000 or more
- When balance falls below the minimum, the account will earn interest at the checking account interest rate for each day it is below the minimum balance.
- Allows for six pre-authorized, third-party, or telephone withdrawals per month; \$10 for each item in excess of six
- \$1,000 deposit required to open an account

CASH MANAGEMENT

Designed to help you effectively manage your company's cash flow.

✓ CONVENIENT ✓ FAST ✓ SECURE

Remote Deposit Capture

Remote Deposit allows you to make deposits without having to come in to the Bank, saving you more time.

ACH Origination

ACH allows you to make payments or collect funds electronically through the Automated Clearing House network.

OTHER SERVICES & SCHEDULE OF CHARGES

- Account closing within six months of opening (Checking or Savings): \$25
- ATM/Debit Card Replacement Fee: \$10
- ATM Fee for withdrawals at any non-Citizens Bank ATMs²: \$.95
- Collection Items: \$10 per item up to \$999.99; \$25 per item \$1,000 or more
- Account Charge-Back Fee: \$5 per check
- Copies: \$.50 per page
- Dormant Account Fee: \$5 per month
- E-Statements
- Fax Fee: \$.2
- Garnishment Processing Fee: \$75 (Allows the bank to recover legal fees associated with garnishments)
- Intuit- Quicken and Intuit- QuickBooks Account Reconciliation
- Medallion Stamp Fee (for bank-customers only): \$25
- Night Deposit Bags: \$20 per year for first bag; \$10 per year for each additional bag
- Official Bank Checks: \$6
- FREE Online Banking for all accounts³
- Overdraft Fee/Returned Item Fee: \$30 per item
- Record Research Fee: \$25 per hour
- Record retrieval: \$.5 per statement; \$2 per item
- Safe Deposit Boxes: \$25, \$35, \$40, or \$50 per year
- Statements on CD Rom: Monthly Statement: \$15; One annual statement (12 months): \$75
- Stop payment request: \$25 per check or draft
- Wire Transfers: \$25 for outgoing within the U.S.; \$50 for outgoing - International; \$10 for incoming wires

¹ Interest accrues daily and is charged per statement period. Call Bank for current overdraft interest rate.

² ATM transactions not initiated at Citizens Bank of America ATMs are subject to an additional fee charged by Citizens Bank of America and owner of ATM.

³ Online Banking with Bill Pay: \$.75 per month (includes first 10 transactions), & \$.40 for each additional transaction

TYPES OF LOANS OFFERED BY CITIZENS BANK OF AMERICUS

WE WILL EXTEND CREDIT TO ANY INDIVIDUAL, PARTNERSHIP, OR CORPORATION THAT CAN MEET OUR NORMAL CREDIT STANDARDS ON A SHORT TERM OR AN INTERMEDIATE TERM BASIS FOR ANY LEGITIMATE PURPOSE. THE PRINCIPAL TYPES OF LOANS WE WILL OFFER TO THE COMMUNITIES IN WHICH WE ARE LOCATED ARE AS FOLLOWS:

- A. CONSUMER LOANS
 - 1. AUTOMOBILE LOANS
 - 2. MARINE LOANS
 - 3. CONSOLIDATION LOANS
 - 4. AIRPLANE LOANS
 - 5. SIGNATURE LOANS
 - 6. OTHER PERSONAL PURPOSE LOANS

- B. COMMERCIAL LOANS
 - 1. ACCOUNTS RECEIVABLE FINANCING
 - 2. INVENTORY FINANCING
 - 3. AIRPLANE LOANS
 - 4. AUTOMOBILE LOANS
 - 5. EQUIPMENT LOANS
 - 6. AGRICULTURAL LOANS
 - 7. SMALL BUSINESS ADMINISTRATION GUARANTEED LOANS
 - 8. FARMER HOME ADMINISTRATION GUARANTEED LOANS
 - 9. OTHER BUSINESS PURPOSE LOANS
 - 10. WORKING CAPITAL LOANS

- C. REAL ESTATE LOANS
 - 1. CONSUMER CONSTRUCTION LOANS
 - 2. COMMERCIAL CONSTRUCTION LOANS
 - 3. HOME IMPROVEMENT LOANS
 - 4. REAL ESTATE ACQUISITION LOANS
 - 5. REAL ESTATE DEVELOPMENT LOANS
 - 6. PERMANENT MORTGAGE LOANS
 - 7. HOME EQUITY LINE-OF-CREDIT LOANS

Cash Management

Our cash management services are designed to help you effectively manage your company's cash flow. These services are available to qualified businesses and offer many benefits including convenience, quicker access to funds, and increased confidentiality.

Cash Management Services include:

- Remote Deposit
- ACH (Automated Clearing House) Origination

Remote Deposit

Take advantage of our easy-to-use Remote Deposit service and make managing your deposits more convenient. Our Remote Deposit service allows you to make deposits without having to come in to the bank, saving you more time.

Benefits of Remote Deposit:

- Convenience – You never have to leave your office.
- You have quicker access to funds.
- You can make deposits after regular banking hours.*

How does Remote Deposit Work?

1. Scan checks for deposit directly from your desktop using a bank-provided scanner.
2. Securely send the digital image of the deposit to Citizens Bank for clearing.
3. After the funds are cleared, they are quickly deposited into your Citizens Bank account.

If you are interested in our Remote Deposit service, please contact us at 229-924-4011.

* Deposits made after 5:00 PM will be credited on the next business day.

ACH Origination

The automated clearing house (ACH) is a nationwide network that processes electronically originated batches of debit and credit transactions. This service allows you to make payments or collect funds electronically through the ACH network. We offer this beneficial service to credit qualified business customers.

For more information, please contact us at 229-924-4011.

Personal Loans

Here at Citizens Bank of Americus, it is our goal to help our customers get the things they need, when they need them. Whether you need to finance a car, boat, medical expense, or maybe even a vacation, our friendly staff will help you get the right loan. Since we are a locally owned bank, we are always available to help you and can give you a quick answer that you deserve! For more detailed information, please contact one of our Loan Officers at our Main Office or Tripp Street Branch (229-924-4011), or at our Preston Branch (229-828-3325).

We offer many types of personal loans, including:

- Automobile Loans
- Boat Loans
- Recreational Vehicle Loans
- Home Improvement Loans
- Debt Consolidation Loans
- Personal Lines of Credit
- Residential Mortgage Loans
- Residential Construction Loans

Mortgages

Citizens Bank of Americus understands the investment involved with real estate mortgages. To help you through the process, you deserve a team of professionals who can make things go as smoothly as possible. Our lending officers are trained professionals with years of banking experience and are dedicated to developing a strong relationship with each customer. Whether you plan to purchase, construct, or refinance your home, we will provide a high level of personal service in order to get you the loan that meets your specific need. For more information, please contact our Mortgage Banker at 229-924-4011, ext. 487.

Business & Agricultural Loans

Small businesses and family farms play a huge role in making southwest Georgia such a wonderful place to live. We look forward to assisting business and farm owners, from the smallest to the largest, with their borrowing needs. We have experienced, professional Loan Officers available who offer customized solutions every day. Our lending decisions are made locally to insure a prompt decision to any requests. We have been meeting the credit needs of Sumter, Webster, and surrounding counties for more than 75 years, with bankers who know our community well! We are here to help you and your business achieve your financial goals.

We offer a variety of Business and Agricultural loans, including:

- Real Estate Loans
- Commercial Construction Loans
- Equipment Loans
- Crop Production Loans
- SBA Guaranteed Loans
- USDA/Farm Service Agency Loans
- Lines of Credit

For more information about these products, contact one of our Commercial Lenders at our Main Office or Tripp St. Branch, or call us at 229-924-4011. We look forward to hearing from you.

Loan-to-deposit ratios



**CITIZENS BANK
OF AMERICUS**

**Loan to Deposit Ratio
2023 Year**

<u>Month</u>	<u>Net Loans (mm)</u>	<u>Total Deposits (mm)</u>	<u>Loans to Deposit Ratio</u>	<u>Quarterly Loan to Deposit Ratio</u>
January	\$ 214,508	\$ 378,834	56.62%	
February	\$ 214,644	\$ 379,207	56.60%	
March	\$ 219,987	\$ 386,234	56.96%	56.73%
April	\$ 217,670	\$ 382,630	56.89%	
May	\$ 225,473	\$ 376,152	59.94%	
June	\$ 230,573	\$ 377,640	61.06%	59.30%
July	\$ 230,966	\$ 388,543	59.44%	
August	\$ 232,652	\$ 386,341	60.22%	
September	\$ 237,226	\$ 381,008	62.26%	60.64%
October	\$ 235,357	\$ 388,822	60.53%	
November	\$ 234,802	\$ 385,114	60.97%	
December	\$ 236,537	\$ 403,361	58.64%	60.05%

CRA Performance Evaluation

PUBLIC DISCLOSURE

October 11, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Bank of Americus
Certificate Number: 15477

119 North Lee Street
Americus, Georgia 31709

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

10 10th Street NE, Suite 900
Atlanta, Georgia 30309-3849

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

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans are outside the institution's assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses and farms of different sizes and individuals of different income levels (including low- and moderate-income).
- The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

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

DESCRIPTION OF INSTITUTION

Citizens Bank of Americus is a state-chartered community bank headquartered in Americus, Sumter County, Georgia (GA). The bank remains wholly owned by CBA Bankshares, Inc., a one-bank holding company, also located in Americus, GA. Citizens Bank of Americus received a “Satisfactory” rating at the previous FDIC CRA Performance Evaluation, dated September 13, 2021, based on Interagency Intermediate Small Institution Examination Procedures.

Citizens Bank of Americus continues to operate three full-service locations in two counties: a main office and one branch in Americus, Sumter County, GA, and one branch in Preston, Webster County, GA. The main office is located in a moderate-income census tract. The Americus and Preston branches are both located in middle-income census tracts. Of note, the Americus branch middle-income census tract is distressed. There have been no mergers, acquisitions, or branch openings or closings, since the previous evaluation.

Citizens Bank of Americus’ lending focus is multi-faceted with a primary focus on commercial lending, which has not changed since the previous evaluation. The bank offers a variety of commercial, agricultural/farm, home mortgage, and consumer loans. In addition, the bank offers conventional mortgage loan options through two third-party broker arrangements, which further helps meet residential real estate credit needs. Citizens Bank of Americus also offers a variety of deposit products and services, including checking, savings, certificates of deposit, money market, and individual retirement accounts. Further, the bank offers alternative delivery systems to make financial services more accessible to customers. Specifically, the bank offers online banking, mobile banking, and telephone banking. Online and mobile banking allows customers to perform a variety of functions, such as transfer funds, review account balances and activity, pay bills, and make person-to-person payments. Citizens Bank also operates two deposit-taking automated teller machines: one at the main office and one at the Americus branch.

As of the June 30, 2024, Consolidated Reports of Condition and Income (Call Report), Citizens Bank of Americus reported \$425.6 million in total assets, \$243.3 million in total loans, \$386.2 million in total deposits, and \$98.4 million in total securities. As shown in the following table, commercial loans (loans secured by non-farm, non-residential properties and commercial and industrial loans) represented the largest portion of the loan portfolio, at 50.1 percent. Residential loans (loans secured by 1-4 family and multi-family residential properties) represented the second largest portion of the loan portfolio, at 21.6 percent. Farm loans (loans secured by farmland and agricultural production loans) represented the third largest portion of the loan portfolio, at 20.5 percent. Consumer loans accounted for a nominal amount of the loan portfolio, at 2.5 percent.

Loan Portfolio Distribution as of 6/30/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	10,250	4.2
Secured by Farmland	31,664	13.0
Secured by 1-4 Family Residential Properties	38,465	15.8
Secured by Multifamily (5 or more) Residential Properties	14,133	5.8
Secured by Nonfarm Nonresidential Properties	79,417	32.6
Total Real Estate Loans	173,929	71.4
Commercial and Industrial Loans	42,477	17.5
Agricultural Production and Other Loans to Farmers	18,115	7.5
Consumer Loans	6,116	2.5
Obligations of State and Political Subdivisions in the U.S.	-	-
Other Loans	2,637	1.1
Lease Financing Receivable (net of unearned income)	-	-
Less: Unearned Income	-	-
Total Loans	243,274	100.0
<i>Source: Call Report</i>		

Examiners did not identify any financial or legal impediments, other than legal lending limits, that would affect Citizens Bank of Americus' ability to meet the credit needs of the assessment area.

DESCRIPTION OF ASSESSMENT AREA

The CRA regulation requires each financial institution to define one or more assessment areas within which to evaluate its CRA performance. Citizens Bank of Americus continues to have one delineated assessment area. However, the assessment area changed since the previous evaluation. Previously, the assessment area consisted of three contiguous, non-Metropolitan Statistical Area counties: Sumter, Webster, and Macon. In September 2021, management removed Macon County from the assessment area, due to not having a branch in the county and considering loan activity. Therefore, the current assessment area consists of Sumter and Webster counties, in their entirety.

Assessment area delineations and demographic compositions are based on available census data. The 2015 American Community Survey (ACS) Census data was used at the previous evaluation to delineate the bank's assessment area. In 2022, the Federal Financial Institutions Examination Council (FFIEC) released updates to the Metropolitan Statistical Areas and Metropolitan Divisions, states, counties, census tracts, and income-level indicators based on information collected during the 2020 United States (U.S.) Census. As a result of the 2020 U.S. Census, the number of census tracts and income classifications changed, which impacted the bank's assessment area. The following tables illustrate the bank's assessment area geographies, by income level, based on the 2015 ACS Census and 2020 U.S. Census data.

Assessment Area Geographies – 2015 ACS Data						
Assessment Area County	Low-Income	Moderate-Income	Middle-Income	Upper-Income	NA*	Total
Sumter	-	2	6	-	-	8
Webster	-	-	2	-	-	2
Macon	-	1	3	-	-	4
Total	-	3	11	-	-	14

Source: 2015 ACS Data; () The NA category consists of geographies that have not been assigned an income classification.*

Assessment Area Geographies – 2020 U.S. Census Data						
Assessment Area County	Low-Income	Moderate-Income	Middle-Income	Upper-Income	NA*	Total
Sumter	-	3	4	1	-	8
Webster	-	-	2	-	-	2
Total	-	3	6	1	-	10

Source: 2020 U.S. Census Data; () The NA category consists of geographies that have not been assigned an income classification.*

In addition, the FFIEC has designated certain non-Metropolitan Statistical Area middle-income census tracts as distressed and/or underserved. The distressed designation is based on high unemployment rates, poverty rates, and/or population loss. The underserved designation is based on areas being rural and remote. In Sumter County, the middle-income census tracts have been designated as distressed due to high poverty rates, from 2021 through 2024. In Webster County, the middle-income census tracts were designated as distressed due to high poverty rates in 2023, but did not have the designation in 2021, 2022, or 2024.

Economic and Demographic Data

According to 2023 Dun & Bradstreet (D&B) data, there are 3,556 businesses and 266 farms operating in the assessment area. Of the businesses and farms, 87.9 percent and 95.9 percent, respectively, reported operating with gross annual revenues of \$1.0 million or less. Further, of the total 3,822 businesses and farms, 64.2 percent reported having four or fewer employees and 90.8 percent reported operating from a single location. The following table presents select demographic information from the 2020 U.S. Census and 2023 D&B data.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	30.0	60.0	10.0	0.0
Population by Geography	31,964	0.0	47.1	49.6	3.3	0.0
Housing Units by Geography	15,413	0.0	41.6	54.1	4.3	0.0
Owner-Occupied Units by Geography	7,560	0.0	32.7	61.4	5.9	0.0
Occupied Rental Units by Geography	4,974	0.0	58.7	39.3	2.0	0.0
Vacant Units by Geography	2,879	0.0	35.2	60.5	4.2	0.0
Businesses by Geography	3,556	0.0	52.4	44.8	2.8	0.0
Farms by Geography	266	0.0	28.2	63.2	8.6	0.0
Family Distribution by Income Level	7,758	25.6	19.1	14.6	40.7	0.0
Household Distribution by Income Level	12,534	29.9	18.8	13.6	37.7	0.0
Median Family Income Non-MSAs - GA		\$55,969	Median Housing Value			\$111,423
			Median Gross Rent			\$722
			Families Below Poverty Level			17.0%
<i>Source: 2020 U.S. Census and 2023 D&B Data; Due to rounding, totals may not equal 100.0%; (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the Standard Industrial Classification System, in 2023, the top industries in the assessment area were services, at 31.4 percent; followed by non-classifiable establishments, at 20.5 percent; retail trade, at 11.9 percent; and transportation/communication, at 9.2 percent. According to the Georgia Department of Labor, major employers include (and in no particular order): Georgia Southwestern State University; South Georgia Technical College; Phoebe Sumter Medical Center; Dent Trucking, LLC; and Interfor-Preston.

According to the Bureau of Labor Statistics, unemployment rates for the counties in the assessment area, the state, and the nation improved from 2021 to 2022 due largely to the waning effects of the COVID-19 pandemic. Unemployment rates in the counties, the state, and the nation remained relatively stable from 2022 to 2023. Sumter County, and generally Webster County, consistently had a higher unemployment rate than the state and national average. The following table reflects the unemployment rates and trends for the assessment area counties, the state, and the nation.

Unemployment Rates*			
Area	2021	2022	2023
	%	%	%
Sumter County	5.7	4.3	4.5
Webster County	4.6	3.9	3.6
State of Georgia	3.9	3.1	3.2
National Average	5.3	3.6	3.6
<i>Source: Bureau of Labor Statistics; *Not seasonally adjusted</i>			

Examiners used the FFIEC’s median family income data to analyze Citizens Bank of Americus’ home mortgage lending under the *Borrower Profile* criterion. The following table reflects the median family income ranges for the low-, moderate-, middle-, and upper-income categories in the Georgia non-Metropolitan Statistical Areas.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2023 (\$69,100)	<\$34,550	\$34,550 to <\$55,280	\$55,280 to <\$82,920	≥\$82,920
<i>Source: FFIEC</i>				

Further, the percentage of families below the poverty level decreased, since the previous evaluation, from 26.3 percent to 17.0 percent, but is still elevated. Also, the percent of low-income families in the assessment area remained relatively unchanged, since the previous evaluation, from 29.8 percent to 25.6 percent. Considering the poverty rate, it could make it difficult for low-income families to qualify for a conventional home mortgage loan, given the assessment area median housing value of \$111,423.

Competition

The assessment area is competitive for financial services. According to the FDIC’s June 30, 2023, *Summary of Deposits Report*, five FDIC-insured financial institutions operate eight offices in the assessment area. Of these institutions, Citizens Bank of Americus ranked first, with a deposit market share of 46.5 percent. The top three financial institutions accounted for 93.3 percent of the deposit market share.

Citizens Bank of Americus is not subject to the CRA or Home Mortgage Disclosure Act (HMDA) data collection and reporting requirements and does not voluntarily collect and report its loan data. Therefore, the analysis of small business, home mortgage, and small farm loans does not include comparisons to aggregate data. However, aggregate data reflects the level of demand for small business, home mortgage, and small farm loans and is relevant to understand the level of competition in the assessment area. Therefore, aggregate data is included for context.

Aggregate data for small business and small farm loans is not available for calendar year 2023. As such, 2022 aggregate data was used. For small business loans, 2022 aggregate data reflects 44 lenders reported 562 small business loans totaling \$10.6 million in the assessment area, indicating a high level of competition. The top five lenders accounted for 60.3 percent, by number, of the market share for small business loans. For small farm loans, 2022 aggregate data reflects eight lenders reported 20 small farm loans totaling \$1.1 million, indicating a moderate level of competition. The top five lenders accounted for 85.0 percent, by number, of the market share for small farm loans.

Aggregate data for home mortgage loans is available for calendar year 2023. For home mortgage loans, 2023 aggregate data reflects 86 lenders reported 352 home mortgage loans totaling \$48.3 million, indicating a high level of competition. The top five lenders accounted for 47.4 percent, by number, of the market share for home mortgage loans.

Community Contact

As part of the evaluation, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps examiners determine whether local financial institutions are responsive to those needs and to identify the credit and community development opportunities that are available.

Examiners conducted one community contact with an organization that promotes economic development in the assessment area, such as trade, commerce, industry, and employment opportunities. The contact stated that there is limited growth in the assessment area and that there is a need for start-up capital and small business loans to support new, and help maintain existing, businesses. The contact further stated that local financial institutions have been responsive to the credit and community development needs.

Credit and Community Development Needs and Opportunities

Considering information obtained from bank management, demographic and economic data, and the community contact, examiners determined that small business and affordable home loans are a need within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (87.9 percent), the number of businesses and farms with four or fewer employees (64.2 percent) and operating from a single location (90.8 percent), and as identified by the community contact, supports the conclusion that small business loans are a credit need. In addition, affordable housing a credit need, as 17.0 percent of families are below the poverty level and 44.7 percent of families are low- and moderate-income. Further, all middle-income census tracts in Sumter County are designated as distressed due to high poverty rates; therefore, the need for revitalization/stabilization and affordable housing further supports the need for small business and affordable housing credit and programs. For additional consideration, given the high poverty level, families may find it difficult to qualify for conventional home loans. Therefore, government-guaranteed home loan programs with more flexible underwriting criteria may be a need and opportunity.

SCOPE OF EVALUATION

General Information

The evaluation covers the period from the prior evaluation, dated September 13, 2021, to the current evaluation, dated October 11, 2024. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate the bank's CRA performance. These procedures include the CRA Small Bank Lending Test and the Community Development Test, as described in the *Appendices*.

Activities Reviewed

The CRA regulation requires a review of an institution's lending performance in its defined assessment area with respect to small business, home mortgage, small farm, and consumer loans, if significant. Examiners selected small business, home mortgage, and small farm loans to assess the

bank's performance under the Lending Test. This conclusion considered the bank's business strategy, distribution of the loan portfolio, and the number and dollar volume of loans originated during the evaluation period. No other loan types, such as consumer non-residential loans, represent a major product line; and, therefore, are not included in this evaluation.

As previously mentioned, Citizens Bank of Americus is not subject to the CRA or HMDA data regulatory collection and reporting requirements. Further, the bank does not voluntarily collect and maintain CRA or HMDA data. Therefore, the evaluation period for small business, home mortgage, and small farm loans, as defined in the *Glossary*, was from January 1, 2023, through December 31, 2023.

During the evaluation period, Citizens Bank of Americus originated 139 small business loans for \$15.0 million, 105 home mortgage loans for \$9.0 million, and 51 small farm loans for \$3.6 million. The universe of small business, home mortgage, and small farm loans were evaluated for the *Assessment Area Concentration*, *Geographic Distribution* performance, and *Borrower Profile* criterion. The 2023 D&B data provided a standard of comparison for small business and small farm loans. The 2020 U.S. Census demographic data provided a standard of comparison for home mortgage loans.

While the number and dollar volume of loans are presented, examiners emphasized performance by the number of loans, because the number of loans is a better indicator of the number of businesses, individuals, and farms served. Considering the bank's lending focus and lending volume, small business and home mortgage loans received equal weight in determining overall conclusions. Small farm loans received less weight. In addition, for the loan products reviewed, the *Geographic Distribution* performance and *Borrower Profile* criteria only include loans originated inside the assessment area.

Lastly, this evaluation includes all community development loans, qualified investments and donations, and community development services identified by bank management. Community development loans and services from September 13, 2021, through October 11, 2024, were considered. Qualified investments included new investments, as well as donations, and any qualified investments from the prior evaluation that were still outstanding as of the current evaluation date.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Lending Test is rated Satisfactory. The rating is supported by a reasonable loan-to-deposit ratio, a reasonable dispersion of loans throughout the assessment area, a reasonable penetration of loans among businesses and farms of different sizes and individuals of different income levels. In addition, the bank has not received any CRA-related complaints, since the previous evaluation. Of note, the bank originated a majority of loans outside of the assessment area. However, the overall Lending Test performance was Satisfactory.

Loan-to-Deposit Ratio

Citizens Bank of Americus' net loan-to-deposit ratio is reasonable (considering seasonal variations and lending-related activities) given the institution's size, financial condition, and assessment area credit needs. Citizens Bank of Americus' net loan-to-deposit ratio, calculated from Call Report data, averaged 56.3 percent over the past 12 calendar quarters from September 30, 2021, to June 30, 2024. The ratio fluctuated from a low of 50.9 percent, as of March 31, 2022, to a high of 62.3 percent, as of September 30, 2023. In addition, the ratio remained relatively stable, from September 30, 2021, to December 31, 2022, and generally increased each calendar quarter, beginning March 31, 2023, through June 30, 2024.

A bank's net loan-to-deposit ratio is compared to similarly situated institutions. These institutions may operate within a bank's assessment area and/or share similar attributes, such as size, branching network, and loan portfolio mix. Citizens Bank of Americus' average, minimum, maximum, and current net loan-to-deposit ratio, over the evaluation period, was slightly below, but comparable to the similarly situated institutions. The following table shows the average net loan-to-deposit ratio comparison data.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 6/30/2024 (\$000s)	Average Net LTD Ratio (%)
Citizens Bank of Americus, Americus, GA	425,564	56.3
Bank of Dudley, Dudley, GA	406,793	69.0
Pineland Bank, Alma, GA	482,993	77.5
First Chatham Bank, Savannah, GA	582,455	60.2
FNB South, Alma, GA	610,695	76.0
<i>Source: Call Reports 9/30/2021 – 6/30/2024</i>		

Further, Citizens Bank of Americus' two third-party broker arrangements provide conventional mortgage loan options to consumers, which are not reflected in the net loan-to-deposit ratio calculations. Since the previous evaluation of September 13, 2021, through the current evaluation of October 11, 2024, the bank brokered the following loans, by year, number, and dollar volume:

- In 2021 (partial), 16 loans for \$2.9 million,
- In 2022, 32 loans for \$5.1 million,
- In 2023, 22 loans for \$3.6 million, and
- In 2024 (year-to-date), 25 loans for \$4.6 million.

Assessment Area Concentration

Citizens Bank of Americus originated a majority of loans outside the institution's assessment area. Specifically, the majority of small business loans, by number and dollar volume, were originated within the assessment area. However, the majority of home mortgage and small farm loans, by number and dollar volume, were originated outside the assessment area. Further, for small farm

loans, the dollar volume was significantly outside of the assessment area. The following table details the bank's lending concentration performance.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	73	52.5	66	47.5	139	7,837	52.1	7,203	47.9	15,040
Home Mortgage	48	45.7	57	54.3	105	3,940	43.7	5,077	56.3	9,017
Small Farm	23	45.1	28	54.9	51	913	25.0	2,734	75.0	3,647
Total	144	48.8	151	51.2	295	12,690	45.8	15,014	54.2	27,704

Source: Bank Data

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Reasonable small business and small farm lending, and excellent home mortgage lending, supports this conclusion. There are no low-income census tracts in the assessment area.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. Lending in moderate-income census tracts was below, but comparable to, demographics when considering competition levels within the assessment area. The following table reflects the distribution of small business loans within the assessment area.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	52.4	32	43.8	3,637	46.4
Middle	44.8	39	53.4	4,073	52.0
Upper	2.8	2	2.7	127	1.6
Totals	100.0	73	100.0	7,837	100.0

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

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. Lending in moderate-income census tracts significantly exceeded demographics. The following table reflects the distribution of home mortgage loans within the assessment area.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Moderate	32.7	22	45.8	1,538	39.0
Middle	61.4	24	50.0	2,299	58.4
Upper	5.9	2	4.2	103	2.6
Total	100.0	48	100.0	3,940	100.0

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

Small Farm Loans

The geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area. Lending in moderate-income census tracts was below, but comparable to, demographics when considering competition levels within the assessment area. The following table reflects the distribution of small farm loans within the assessment area.

Geographic Distribution of Small Farm Loans					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	28.2	4	17.4	100	10.9
Middle	63.2	17	73.9	797	87.3
Upper	8.6	2	8.7	16	1.8
Totals	100.0	23	100.0	913	100.0

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

Borrower Profile

Overall, the distribution of loans to borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses and farms of different sizes and individuals of different income levels (including low- and moderate-income). Reasonable small business, home mortgage, and small farm lending supports this conclusion.

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. Lending to businesses with gross annual revenues of \$1.0 million or less (small businesses) was below demographics. Although lending performance was below demographics, D&B data reflects the percentage of businesses, by gross annual revenue, and not the level of demand for small business loans. To gain a better understanding of credit needs and demand in the assessment area, examiners reviewed aggregate market data from institutions that collect and report data on small business loans. The 2022 aggregate data reflects that 53.7 percent of all small business loans were to small businesses. The following table reflects the penetration of small business loans, by businesses of different sizes.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	87.9	49	67.1	3,372	43.0
>\$1,000,000	2.8	22	30.1	3,943	50.3
Revenue Not Available	9.3	2	2.7	522	6.7
Total	100.0	73	100.0	7,837	100.0
<i>Source: 2023 D&B Data, Bank Data; Due to rounding, totals may not equal 100.0%</i>					

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels. Citizens Bank of Americus did not originate any home mortgage loans to low-income borrowers. However, for context of the bank’s performance compared to demographics, 66.4 percent of the low-income families live below the poverty level. These families would generally not qualify for conventional home mortgage financing. Further, to gain a better understanding of credit needs and demand in the assessment area, examiners reviewed aggregate market data from institutions that collect and report data on home mortgage loans. The 2023 aggregate market data reflects that 6.0 percent of all home mortgage loans were to low-income borrowers. Thus, considering the poverty rate and aggregate performance, lending opportunities are limited. Home mortgage lending to moderate-income borrowers exceeded demographics. The following table reflects the penetration of home mortgage loans, by income level.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	25.6	0	0.0	0	0.0
Moderate	19.1	14	29.2	521	13.2
Middle	14.6	8	16.7	372	9.5
Upper	40.7	26	54.2	3,047	77.3
Not Available	0.0	0	0.0	0	0.0
Total	100.0	48	100.0	3,940	100.0
<i>Source: 2020 U.S. Census; Bank Data; Due to rounding, totals may not equal 100.0%</i>					

Small Farm Loans

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. Lending to farms with gross annual revenues of \$1.0 million or less (small farms) was below, but comparable to, demographics. The following table reflects the penetration of small farm loans, by farms of different sizes.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	95.9	19	82.6	712	77.9
>\$1,000,000	3.4	4	17.4	201	22.1
Revenue Not Available	0.8	0	0.0	0	0.0
Total	100.0	23	100.0	913	100.0
<i>Source: 2023 D&B Data, Bank Data; Due to rounding, totals may not equal 100.0%</i>					

Response to Complaints

Citizens Bank of Americus has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

The institution’s community development performance demonstrates adequate responsiveness to community development needs in its assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities for community development in the institution’s assessment area.

Community Development Loans

During the evaluation period, the bank originated, renewed, or refinanced 18 community development loans totaling \$3.7 million, compared to 29 community development loans totaling \$4.6 million at the previous evaluation. Although the number of community development loans declined compared to the previous evaluation, the dollar volume remained comparable.

Based on dollar volume, the bank’s current community development lending activity represents 1.6 percent of net loans. Citizens Bank of Americus’ community development loans to net loans is below the similarly situated institutions of 5.5 percent, 9.1 percent, and 11.5 percent. Although the bank’s performance is below the similarly situated institutions, quantitatively, the bank’s community development loan activity primarily supported revitalization and stabilization efforts, which helps meet a primary need of the assessment area. Overall, the bank’s community development loans demonstrate adequate responsiveness to the community development needs in the assessment area. The following table reflects the bank’s overall community development lending, by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021 (partial)	-	-	-	-	-	-	-	-	-	-
2022	-	-	-	-	3	1,621	5	943	8	2,564
2023	-	-	1	100	-	-	2	326	3	426
2024 (*YTD)	-	-	-	-	-	-	7	751	7	751
Total	-	-	1	100	3	1,621	14	2,020	18	3,741
<i>Source: Bank Data; *Year-to-Date</i>										

The following are examples of community development loans originated within the assessment area.

- In 2022, the bank originated a \$1.5 million loan to a business located in a moderate-income geography for construction and expansion efforts that created new jobs, benefiting low- and moderate-income individuals.
- In 2022, the bank originated a \$627,000 loan to renovate an abandoned building in a moderate-income geography and provide for commercial use.
- In 2023, the bank originated a \$100,000 loan for business expenses of an organization located in a moderate-income geography that provides healthcare and other essential services for low- and moderate-income individuals.

Qualified Investments

During the evaluation period, Citizens Bank of Americus made 67 qualified donations to 22 organizations, totaling approximately \$1.0 million. The bank’s donations increased from the previous evaluation, where there were nine qualified donations totaling \$130,000. For both the current and previous evaluation, the bank did not participate in any locally based qualified investments due to the limited investment opportunities within its rural assessment area.

Qualified investments and donations are typically compared to the bank’s total assets and securities. Although the bank did not participate in qualified investments, total donations equate to 0.3 percent of total assets and 1.1 percent of total securities. Citizens Bank of Americus’ percentage levels are comparable to the similarly situated institutions of 0.2 percent, 0.3 percent, and 0.4 percent of total assets, and 1.4 percent, 4.9 percent, and 5.8 percent of total securities. Of note, one similarly situated institution also did not participate in any locally based qualified investments due to limited opportunities within its rural assessment area. Citizens Bank of Americus’ donations demonstrate adequate responsiveness to the community development needs in the assessment area, in consideration of available opportunities and the performance of the similarly situated institutions. The following table reflects the bank’s donation activity, by purpose.

Qualified Investments										
Activity	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Qualified Grants & Donations	1	5	49	790	3	75	14	178	67	1,048
Total	1	5	49	790	3	75	14	178	67	1,048

Source: Bank Data

The following are examples of donations made within the assessment area.

- In 2022, the bank donated \$5,000 to an organization that addresses housing poverty and promotes partnerships to provide affordable housing for low- and moderate-income individuals.
- From 2022 to 2024, the bank made three donations totaling \$150,000 to help fund construction and expansion efforts, in a moderate-income geography, of an organization that attracts new and supports existing businesses, thereby promoting revitalization and stabilization.
- From 2022 to 2024, the bank made three donations totaling \$75,000 to an organization that promotes workforce development, improved infrastructure, and economic development.

Community Development Services

During the evaluation period, bank members acting as representatives of Citizens Bank of Americus provided 63 community development services to 14 organizations, where bank representatives served as a Board or committee member and attended regular meetings. Included in the 62 community development services were eight service activities with two organizations with a regional and statewide footprint, benefiting multiple areas including the bank’s assessment area.

Citizens Bank of Americus’ community development service activities are comparable to the similarly situated institutions of 3, 41, and 135. The bank’s community development services demonstrate adequate responsiveness to the community development needs in the assessment area, as bank representatives are involved in various organizations that provide affordable housing, essential community services, economic development, and attracting and retaining new and existing businesses and residents. The following table reflects the bank’s community development services, by year and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021 (partial)	2	5	4	3	14
2022	2	5	4	3	14
2023	5	5	4	3	17
2024 (*YTD)	6	5	4	3	18
Total	15	20	16	12	63

Source: Bank Data; *Year-to-Date

The following are examples of community development services within the assessment area.

- From 2021 to 2024, a member of bank management served as a Board member for an organization that addresses systemic challenges related to economic growth and promotes economic and workforce development.
- From 2021 to 2024, a member of bank management served as a Board member for an organization that provides affordable housing for low- and moderate-income individuals.
- From 2021 to 2024, a member of bank management served as a Board member for an organization that revitalizes vacant and abandoned properties and buildings to promote opportunities for development, investment, and growth.

In addition, the following community development service activities have regional and statewide impact, including benefiting the bank's assessment area.

- From 2021 to 2024, a member of bank management served as a Board member of an organization that provides affordable housing programs for low- and moderate-income individuals through partnerships throughout the U.S. Southeast.
- From 2021 to 2024, a member of bank management served as a Board member for an organization that promotes rural development and agricultural initiatives, with an emphasis on creating more jobs in non-urban communities, throughout the state of GA.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

Community Development Test

The Community Development Test considers the following criteria:

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

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

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

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

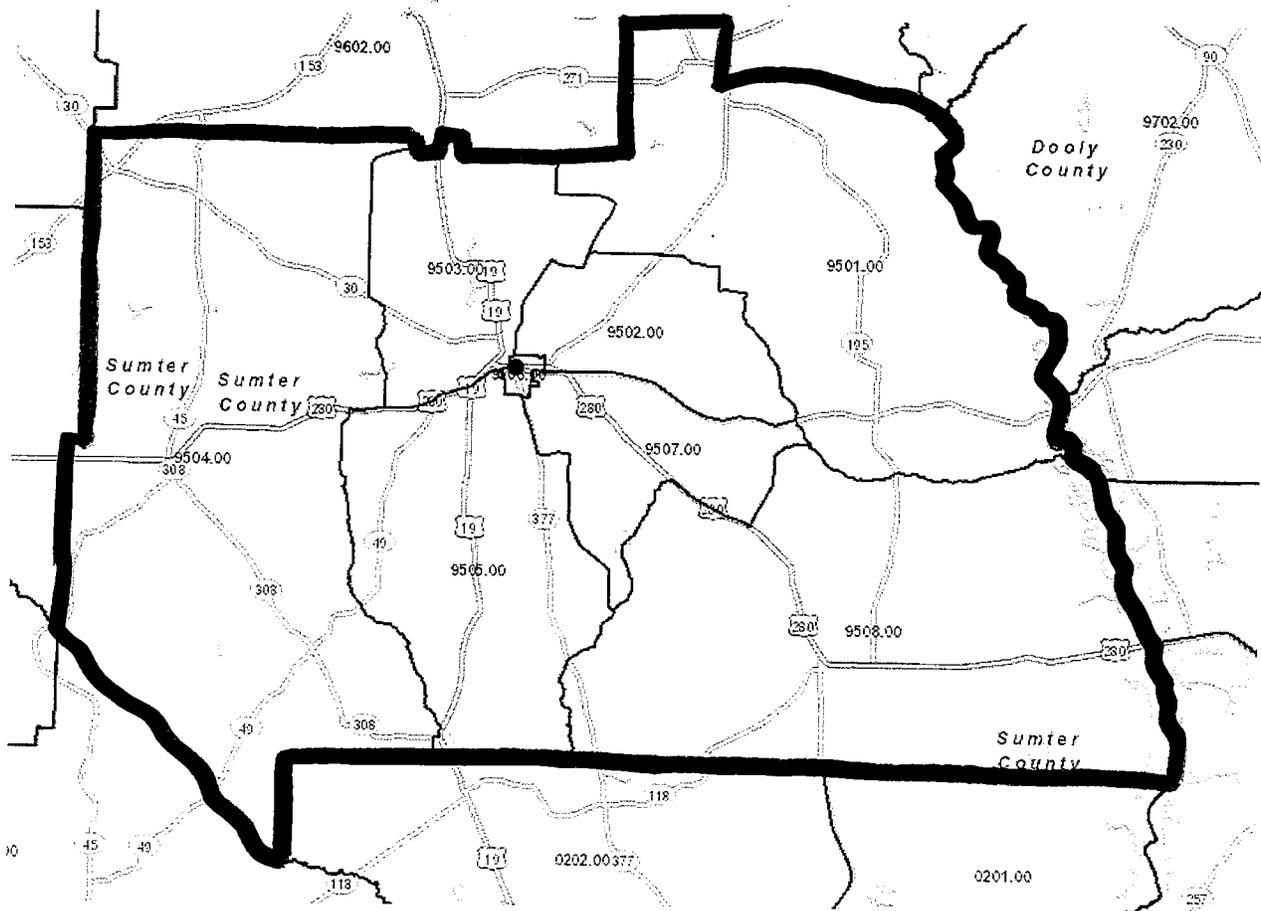
Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

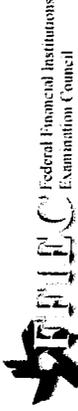
“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

Maps

Assessment Area – Census Tracts
Sumter County



2023 FFIEC Census Report - Summary Census Demographic Information
 State: 13 - GEORGIA (GA)
 County: 261 - SUMTER COUNTY



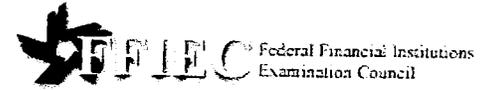
State	County (Code)	Tract (Code)	Family Income Level	Disproportionately Underserved Tract	Tract Median Family Income %	2023 FFIEC ESAM (MID)	2023 ESAM Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	Renters Family Units
13	261	9501.00	Upper	No	148.33	\$69,100	\$102,496	\$83,019	1041	31.89	332	446	659
13	261	9502.00	Middle	Yes*	112.58	\$69,100	\$77,793	\$63,015	5135	74.16	3808	1144	2037
13	261	9503.00	Moderate	No	77.93	\$69,100	\$53,850	\$43,620	6362	72.37	4604	1398	2786
13	261	9504.00	Middle	Yes*	81.21	\$69,100	\$56,116	\$45,455	2568	42.25	1065	739	1292
13	261	9505.00	Middle	Yes*	118.64	\$69,100	\$81,980	\$66,406	3690	42.68	1575	1023	1519
13	261	9506.00	Moderate	No	69.65	\$69,100	\$48,128	\$38,983	2059	61.68	1270	290	922
13	261	9507.00	Moderate	No	61.47	\$69,100	\$42,476	\$34,407	6640	68.19	4528	787	2152
13	261	9508.00	Middle	Yes*	103.19	\$69,100	\$71,304	\$57,760	2121	41.77	886	761	1523
13	261	9999.99	Middle	No	96.35	\$69,100	\$66,578	\$53,930	29616	61.08	18088	6588	12890

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

2023 FFIEC Census Report - Summary Census Income Information

State: 13 - GEORGIA (GA)

County: 261 - SUMTER COUNTY

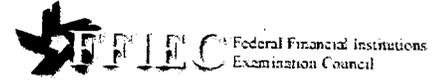


State Code	County Code	Tract Code	Tract Income Level	2020 MSA/MD Statewide non-MSA/MD Median Family Income	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2020 Tract Median Family Income	2023 Es. Tract Median Family Income	2020 Tract Median Household Income
13	261	9501.00	Upper	\$55,969	\$69,100	15.13	148.33	\$83,019	\$102,496	\$82,535
13	261	9502.00	Middle	\$55,969	\$69,100	18.84	112.58	\$63,015	\$77,793	\$45,917
13	261	9503.00	Moderate	\$55,969	\$69,100	27.63	77.93	\$43,620	\$53,850	\$34,427
13	261	9504.00	Middle	\$55,969	\$69,100	24.93	81.21	\$45,455	\$56,116	\$35,326
13	261	9505.00	Middle	\$55,969	\$69,100	14.09	118.64	\$66,406	\$81,980	\$54,273
13	261	9506.00	Moderate	\$55,969	\$69,100	43.98	69.65	\$38,983	\$48,128	\$31,375
13	261	9507.00	Moderate	\$55,969	\$69,100	29.50	61.47	\$34,407	\$42,476	\$27,289
13	261	9508.00	Middle	\$55,969	\$69,100	19.54	103.19	\$57,760	\$71,304	\$41,050
13	261	9999.99	Middle	\$55,969	\$69,100	24.35	96.35	\$53,930	\$66,578	\$37,174

2023 FFIEC Census Report - Summary Census Population Information

State: 13 - GEORGIA (GA)

County: 261 - SUMTER COUNTY



State Code	County Code	Tract Code	Tract Population	Tract Minority %	Number of Families	Number of Households	Non-Hispanic White Population	Tract Minority Population	American Indian Population	Asian, Hawaiian, Pacific Islander Population	Black Population	Hispanic Population	Other Population Two or More Races
13	261	9501.00	1041	31.89	464	546	709	332	4	12	255	37	24
13	261	9502.00	5135	74.16	1477	2245	1327	3808	2	94	3278	319	115
13	261	9503.00	6362	72.37	1423	2307	1758	4604	5	37	4310	98	154
13	261	9504.00	2568	42.25	688	996	1483	1085	7	13	881	114	70
13	261	9505.00	3690	42.68	889	1331	2115	1575	10	40	1192	233	100
13	261	9506.00	2059	61.68	481	802	789	1270	6	13	1038	160	53
13	261	9507.00	6640	68.19	1120	2285	2112	4528	6	290	3376	725	131
13	261	9508.00	2121	41.77	567	907	1235	886	0	8	721	84	73
13	261	9999.99	29616	61.08	7109	11419	11528	18088	40	507	15051	1770	720

2023 FFIEC Census Report - Summary Census Housing Information

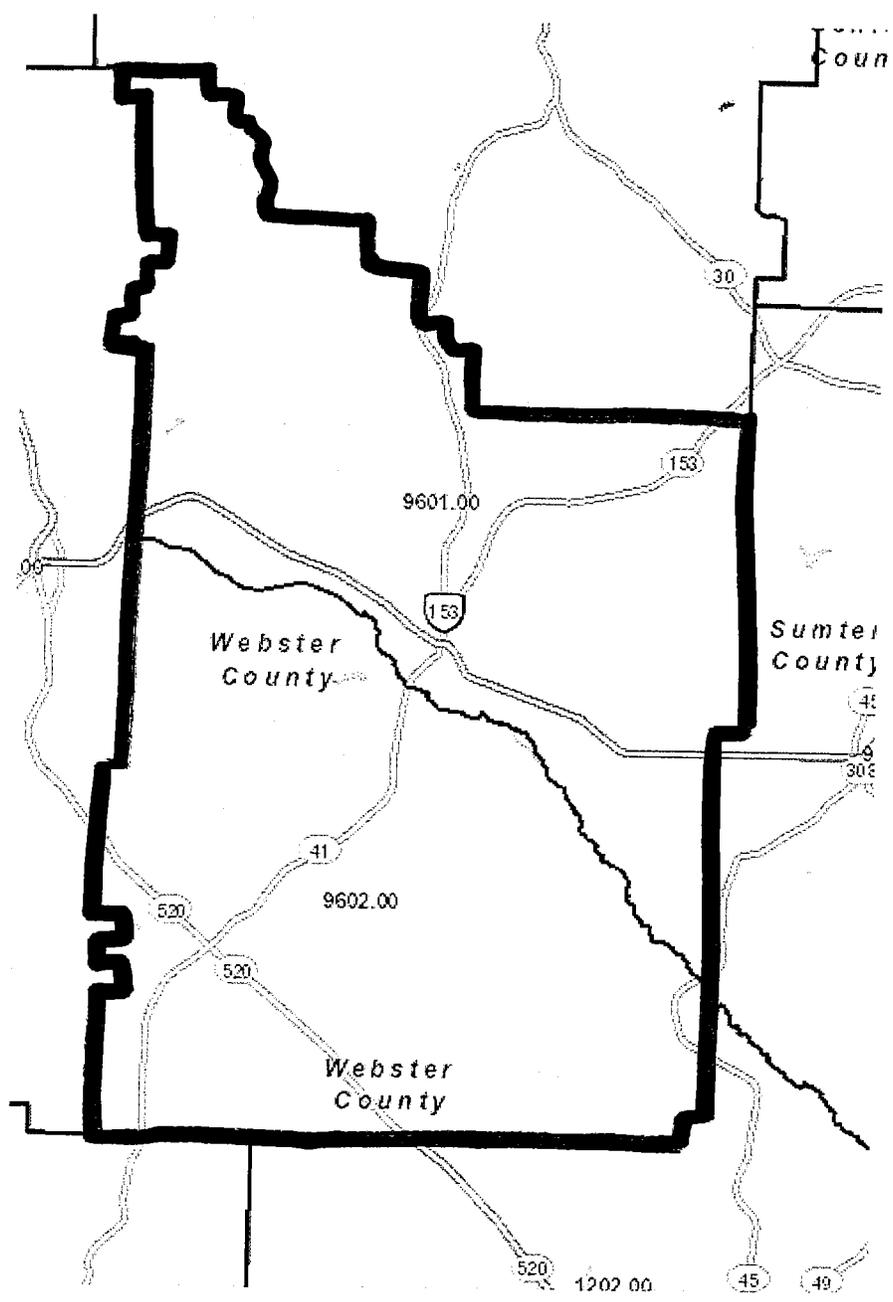
State: 13 - GEORGIA (GA)

County: 261 - SUMTER COUNTY



State Code	County Code	Tract Code	Total Housing Units	1-104-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1-104-Family Units	Renter Occupied Units
13	261	9501.00	668	659	22	No	446	122	437	100
13	261	9502.00	2390	2037	43	No	1144	145	1144	1101
13	261	9503.00	2800	2786	37	No	1398	493	1398	909
13	261	9504.00	1330	1292	48	No	739	334	739	257
13	261	9505.00	1558	1519	51	No	1023	227	1014	308
13	261	9506.00	1015	922	74	No	290	213	290	512
13	261	9507.00	2593	2152	31	No	787	308	776	1498
13	261	9508.00	1523	1523	40	No	761	616	761	146
13	261	9999.99	13877	12890	40	No	6588	2458	6559	4831

Assessment Area – Census Tracts
Webster County



2023 FFIEC Census Report - Summary Census Demographic Information
 State: 13 - GEORGIA (GA)
 County: 307 - WEBSTER COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2020 FFIEC ESMSAM/D	2020 Tract Median Family Income	2021 Tract Median Family Income	2022 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	Total Family Units
13	307	9601.00	Middle	Yes*	85.14	\$69,100	\$58,832	\$47,656	1215	54.81	666	505	693	
13	307	9602.00	Middle	Yes*	115.81	\$69,100	\$80,025	\$64,821	1133	48.19	546	467	806	
13	307	9999.99	Middle	No	88.88	\$69,100	\$61,416	\$49,750	2348	51.62	1212	972	1499	

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

2023 FFIEC Census Report - Summary Census Income Information
 State: 13 - GEORGIA (GA)
 County: 307 - WEBSTER COUNTY



State Code	County Code	Tract Code	Tract Income Level	2020 MSA/MD Statewide non-MSA/MD Median Family Income	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2020 Tract Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Household Income
13	307	9601.00	Middle	\$55,969	\$69,100	22.59	85.14	\$47,656	\$58,832	\$26,438
13	307	9602.00	Middle	\$55,969	\$69,100	26.65	115.81	\$64,821	\$80,025	\$35,579
13	307	9999.99	Middle	\$55,969	\$69,100	24.66	88.88	\$49,750	\$61,416	\$31,629

2023 FFIEC Census Report - Summary Census Population Information

State: 13 - GEORGIA (GA)

County: 307 - WEBSTER COUNTY



State Code	County Code	Tract Code	Tract Population	Tract Minority %	Number of Families	Number of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian Hawaiian Pacific Islands Population	Black Population	Hispanic Population	Other Population Two or More Races
13	307	9601.00	1215	54.81	302	542	549	666	0	7	592	28	39
13	307	9602.00	1133	48.19	347	573	587	546	0	11	471	31	33
13	307	9999.99	2348	51.62	649	1115	1136	1212	0	18	1063	59	72

2023 FFIEC Census Report - Summary Census Housing Information
 State: 13 - GEORGIA (GA)
 County: 307 - WEBSTER COUNTY



State Code	County Code	Tract Code	Total Housing Units	1-to-4-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1-to-4-Family Units	Renter Occupied Units
13	307	9601.00	730	693	38	No	505	188	505	37
13	307	9602.00	806	806	35	No	467	233	467	106
13	307	9999.99	1536	1499	36	No	972	421	972	143