

PUBLIC DISCLOSURE

January 26, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The State Savings Bank of Manistique
RSSD #259956

101 South Cedar Street
Manistique, Michigan 49854

Federal Reserve Bank of Minneapolis

90 Hennepin Avenue
P.O. Box 291
Minneapolis, Minnesota 55480

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

The State Savings Bank of Manistique (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A substantial majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Small Institutions to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Examiners reviewed the following data:

- The bank's 20-quarter average NLTD ratio.
- A statistical sample of 94 consumer loans and 47 small business loans originated between March 1, 2025, and August 31, 2025, as well as 52 residential real estate loans originated between September 1, 2024, and August 31, 2025. Small business, residential real estate, and consumer loans represent a significant portion of originations, by dollar amount and volume of loans.

Of the five lending performance criteria, examiners placed the greatest weight on the bank's lending to borrowers of different income levels and businesses of different sizes. The NLTD ratio and lending inside the AA received the next highest weight; these criteria were weighted equally. The geographic distribution of loans received the least weight. By loan type, examiners gave small business loans and residential real estate loans the greatest and equal weight based on the number and dollar amount of lending during the evaluation period.¹ Consumer loans were weighted less.

¹ In 2020 and 2021, the bank participated in Paycheck Protection Program (PPP) lending through the Small Business Administration. These loans were designed to help businesses keep their workforces employed during the COVID-19 pandemic. Examiners considered the bank's PPP loans made during 2021 in their evaluation of the bank's small business loans. PPP loans made in 2020 were considered at the previous evaluation.

DESCRIPTION OF INSTITUTION

The State Savings Bank of Manistique is a community bank headquartered in Manistique, Michigan. The bank’s characteristics include:

- The bank is a wholly-owned subsidiary of SSB, Inc., also headquartered in Manistique.
- The bank has two partially-owned subsidiaries: an insurance agency and a technology service corporation.
- The bank has total assets of \$169.4 million as of September 30, 2025.
- In addition to its main office in Manistique, the bank has two limited-service branches in Curtis and Gulliver, Michigan.²
- The bank operates drive-up facilities at all three offices and offers Saturday hours at the main office drive-up. The Curtis branch offers seasonal Saturday hours in the lobby and at its drive-up (Memorial Day to Labor Day). The bank also operates two interactive teller machines and one full-service ATM at the main office, and a cash-dispensing-only ATM at the Curtis branch.
- As shown in Table 1, the bank’s primary business focus is commercial and residential real estate loans. The bank also provides consumer loans throughout its AA. In addition to conventional loans, the bank offers government-sponsored loan programs through the Small Business Administration. The overall composition of the bank’s loan portfolio did not change significantly since the previous evaluation. However, commercial and residential real estate loans increased by 60.0% and 59.1%, respectively.

Table 1		
Composition of Loan Portfolio as of September 30, 2025		
Loan Type	\$(000)	%
Agricultural	35	0.0
Commercial	43,210	49.6
Residential Real Estate	33,256	38.1
Consumer	10,012	11.5
Other	687	0.8
Gross Loans	87,200	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its November 2, 2020, performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

² In 2023, the bank consolidated its Deer Street branch in Manistique with its main office. The branch was only 0.6 miles from the main office.

DESCRIPTION OF ASSESSMENT AREA

The bank’s Manistique AA comprises all of Luce and Schoolcraft counties and portions of Alger, Delta, and Mackinac counties.³ See Appendix A for an AA map and Appendix B for additional demographic data.

- The bank’s AA consists of 13 census tracts: 10 middle- and three unknown-income tracts. Unknown-income tracts 9900.00 in Luce County and 9900.00 in Schoolcraft County consist entirely of water (small portions of Lake Superior and Lake Michigan, respectively). Unknown-income tract 9800.00 in Luce County is heavily forested and includes a lake. All of the bank’s middle-income tracts in the AA are designated as distressed and/or underserved.
- At the previous evaluation, the AA included three moderate-, seven middle-, and three unknown-income tracts. The bank has not changed its AA since the previous evaluation. However, the income classifications of four tracts changed (three from moderate to middle, and one from middle to moderate income), based on 2020 census changes. Subsequently, based on 2024 FFIEC adjusted census data, the new moderate-income tract was changed back to middle income.
- Small portions of the Sault Ste. Marie Reservation off-reservation tribal land are in the bank’s AA.
- According to the June 30, 2025, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank ranks seventh out of nine FDIC-insured financial institutions with offices in Alger, Delta, Luce, Mackinac, and Schoolcraft counties, with 8.9% of the deposits.
- Examiners spoke with community contacts familiar with local and regional business and housing economic conditions, as well as demographic characteristics of the AA.

Table 2 Population Change			
Area	2015 Population	2020 Population	Percent Change
Alger County, MI	9,476	8,842	-6.7%
Delta County, MI	36,712	36,903	0.5%
Luce County, MI	6,477	5,339	-17.6%
Mackinac County, MI	11,044	10,834	-1.9%

³Census tracts 1.00 and 3.00 in Alger County, tract 9701.00 in Delta County, and tracts 9502.00 and 9503.00 in Mackinac County.

Table 2			
Population Change			
Schoolcraft County, MI	8,288	8,047	-2.9%
NonMSA Michigan	1,669,627	1,659,797	-0.6%
Michigan	9,900,571	10,077,331	1.8%
<i>Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census</i>			

- As shown in Table 2, all but one of the counties in the AA experienced population loss. According to 2025 FFIEC adjusted census data, the population in the AA is 25,529, which decreased 6.9% since the previous evaluation.
- Historically, the AA has faced a declining, aging population as younger people moved to larger cities outside the region for better employment opportunities. However, a community contact noted that increased tourism after the COVID-19 pandemic, as well as a greater prevalence of remote work, spurred some people to move to the area and helped stabilize the population. After three years of construction, internet broadband infrastructure is widely available and has added to the AA’s appeal for remote workers, retirees, and those looking to start a family.

Table 3			
Median Family Income Change			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Alger County, MI	\$57,079	\$59,335	4.0%
Delta County, MI	\$59,766	\$60,681	1.5%
Luce County, MI	\$50,470	\$65,417	29.6%
Mackinac County, MI	\$50,645	\$59,660	17.8%
Schoolcraft County, MI	\$52,243	\$61,420	17.6%
Michigan	\$68,010	\$75,470	11.0%
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- As shown in Table 3, the median family income in the counties in the AA has increased since 2015, with increases in Luce, Mackinac, and Schoolcraft counties outpacing the overall statewide change. According to 2025 FFIEC adjusted census data, the median family income in the AA is \$59,534.
- Wages vary significantly by business and industry. Bank management indicated that wages for jobs in the biggest industries (healthcare, milling, mining) can exceed \$75,000 per year, while jobs in the tourism industry typically pay \$15 to \$20 per hour.
- According to 2025 FFIEC adjusted census data, LMI households comprise 43.2% of all households in the AA.

Table 4 Housing Cost Burden						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Alger County, MI	62.0%	40.0%	42.3%	58.4%	26.1%	19.0%
Delta County, MI	50.9%	12.7%	31.4%	60.6%	23.7%	15.6%
Luce County, MI	64.4%	30.0%	36.5%	50.0%	19.4%	13.9%
Mackinac County, MI	55.4%	26.7%	29.8%	55.9%	19.0%	16.9%
Schoolcraft County, MI	67.1%	21.1%	47.3%	56.0%	15.0%	15.6%
NonMSA Michigan	66.8%	30.6%	39.1%	59.4%	24.6%	17.2%
Michigan	75.3%	35.6%	42.9%	62.1%	27.2%	17.5%
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						

- Table 4 shows the housing cost burden faced by renters and homeowners in the counties in the AA, the non-MSA areas of Michigan, and the state of Michigan. Overall, low-income homeowners and renters, as well as some moderate-income renters in some areas, face significant cost burdens.
- Housing stock in the AA includes affordable inland houses and more expensive waterfront properties. Many of the waterfront homes are seasonally-occupied second homes or investment properties, which explains why 49.8% of homes in the AA are classified as vacant according to 2025 FFIEC census adjusted data. A contact stated that homes near the water can sell for around \$500,000.
- A community contact indicated that the lack of mid-priced housing (in the \$200,000 to \$300,000 range) inhibits employers from recruiting talent and expanding their workforces. Lower-priced homes are older and often require significant repairs, which can make homeownership undesirable and/or unaffordable for many LMI individuals and families. Additional maintenance and utility costs for non-city residents, like maintaining a septic tank, can add several hundred dollars per month of expenses.
- An increase in short-term rental properties has resulted in more availability for tourists but hindered the ability for seasonal workers to find affordable housing, according to a contact. Some cities, like Manistique, have ordinances to limit the number of short-term rental properties.

Table 5 Unemployment Rates				
Area	2021	2022	2023	2024
Alger County, MI	7.8%	7.3%	7.7%	8.7%
Delta County, MI	6.2%	5.7%	5.5%	6.1%
Luce County, MI	7.5%	6.9%	6.8%	7.9%

Table 5 Unemployment Rates				
Mackinac County, MI	8.6%	8.9%	9.1%	9.7%
Schoolcraft County, MI	7.8%	7.6%	7.4%	8.1%
Non-MSA Michigan	5.8%	5.1%	5.0%	5.6%
Michigan	5.7%	4.2%	3.9%	4.7%
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>				

- Despite the non-MSA Michigan and statewide unemployment rates generally decreasing between 2021 and 2024, the unemployment rate increased slightly in four of the five counties in the AA during the same period, as shown in Table 5. Bank management described employment as generally stable.
- According to community contacts, tourism is the biggest economic driver in the AA. Major employers in the AA include the local hospitals, paper mills, school districts, and local governments. The retail industry employs a significant number of people; some businesses, particularly restaurants, close for one to four months in the winter when tourism is low.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, number of offices, product offerings, market share, and locations (within or outside of but in the same counties as the AA).

The bank’s NLTD ratio is reasonable. As shown in Table 6, the bank’s average NLTD ratio for the past 20 quarters is 49.0%. At the previous evaluation, the bank’s 18-quarter average NLTD ratio was 55.5%. The bank’s NLTD ratio ranged from 38.9% to 61.4% during the current period. The NLTD ratio decreased during the pandemic as loan demand decreased and deposits increased. The bank also saw an increase in its deposits when a local financial institution headquartered in Manistique, Michigan, was acquired by a national bank in September 2021. From the end of 2021 to the most recent quarter in the evaluation period, the bank’s NLTD ratio increased steadily to the high of 61.4%. Bank management indicated loan demand accelerated post-pandemic and has remained steady since.

As of September 30, 2025, the bank’s NLTD ratio was 61.4%, which is below the peer group ratio of 68.7%. The bank’s peer group includes all insured commercial banks having assets between

\$100 million and \$300 million, with two or fewer full-service banking offices and not located in an MSA.

Table 6			
Comparative NLTD Ratios for December 31, 2020, to September 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			20-Quarter Average
The State Savings Bank of Manistique	Manistique, Michigan	169,427	49.0
Similarly Situated Institutions			
Peoples State Bank of Munising	Munising, Michigan	194,022	66.4
Baybank	Gladstone, Michigan	166,209	80.3

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. As shown in Table 7, the bank originated a substantial majority of the bank’s loans, by number and dollar, inside the AA. The bank originated some loans outside the AA, primarily due to relationships with borrowers.

Table 7								
Lending Inside and Outside the AA								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Small Business	46	97.9	5,004	85.0	1	2.1	886	15.0
Residential Real Estate	42	80.8	4,707	78.2	10	19.2	1,312	21.8
Consumer	90	95.7	1,361	96.2	4	4.3	53	3.7
Total	178	92.2	11,072	83.1	15	7.8	2,251	16.9

Note: Percentages may not total 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank’s geographic distribution of small business, residential real estate, and consumer loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. During the loan sample years of 2024 and 2025, there were no LMI census tracts in the AA. The AA consists of 10 middle-income and three unknown-income tracts.⁴ The bank extended loans (though not each loan type) in all but one of the middle-income census tracts, specifically tract 1.00 in Alger County. This tract is more than 30 miles from the bank’s main office and

⁴ As mentioned, the unknown-income tracts are water or a combination of forested land and water; understandably, the bank made no loans in these tracts.

branches, and the bank likely faces competition from other financial institutions in closer proximity to the tract. Examiners did not identify any unexplained gaps in lending.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. Overall, the bank’s lending has an excellent distribution among individuals of different income levels and businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. Table 8 shows the bank’s distribution of small business loans by revenue of borrowers, as well as demographic information.

Table 8					
Distribution of 2025 Small Business Lending By Revenue Size of Businesses					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	42	91.3	4,053	81.0	90.0
Over \$1 Million	4	8.7	951	19.0	6.7
Revenue Unknown	0	0.0	0	0.0	3.3
Total	46	100.0	5,004	100.0	100.0
By Loan Size					
\$100,000 or Less	32	69.6	1,204	24.1	
\$100,001 - \$250,000	8	17.4	1,474	29.5	
\$250,001 - \$1 Million	6	13.0	2,326	46.5	
Total	46	100.0	5,004	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	31	73.8	1,154	28.5	
\$100,001 - \$250,000	7	16.7	1,324	32.7	
\$250,001 - \$1 Million	4	9.5	1,575	38.9	
Total	42	100.0	4,053	100.0	
<i>Source: 2025 FFIEC Census Data 2025 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

The bank’s lending to businesses with gross annual revenues of \$1 million or less (small businesses) is comparable to demographics, which indicate that 90.0% of businesses in the AA are small businesses. Bank management indicated that small business loan demand has been

steady in recent years and the bank works to maintain its core customer base, which includes local small businesses. The bank originated 73.8% of its loans to small businesses in amounts of \$100,000 or less, which indicates a willingness to serve the needs of small businesses in the AA.

In addition, the bank actively extended PPP loans in the AA. The bank originated 45 PPP loans totaling \$1.2 million to businesses in 2021. Of these loans, 32 (71.1%) were for less than \$25,000. The bank’s PPP lending was responsive to small business credit needs.

Residential Real Estate Lending

The borrower distribution of residential real estate lending is excellent. Table 9 shows the bank’s consumer lending by borrower income level, as well as demographic information.

Table 9					
Distribution of 2024 and 2025 Residential Lending By Borrower Income Level					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	%	
Low	6	14.3	353	7.5	18.9
Moderate	11	26.2	1,105	23.5	21.2
Middle	11	26.2	1,271	27.0	24.5
Upper	13	31.0	1,914	40.7	35.4
Unknown	1	2.4	63	1.3	0.0
Total	42	100.0	4,707	100.0	100.0

*Source: 2024 and 2025 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey*

Note: Percentages may not total 100.0 percent due to rounding.

The bank’s residential real estate lending to low-income borrowers is below demographics, which indicate that 18.9% of families in the AA are low income. However, the bank’s lending to moderate-income borrowers is above demographics, which indicate that 21.2% of families in the AA are moderate income. Bank management and community contacts indicated that home prices are increasing. Housing near the lake is expensive, and affordable homes are often in need of repair. In addition, the area lacks mid-priced housing. Finally, as mentioned, low-income, and some moderate-income, homeowners in the AA face significant housing cost burden. Given the performance context, the bank’s residential real estate lending to LMI borrowers is excellent.

Consumer Lending

The borrower distribution of consumer lending is excellent. Table 10 shows the bank’s consumer lending by borrower income level, as well as demographic information.

Table 10					
Distribution of 2025 Consumer Lending By Borrower Income Level					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	%	
Low	43	47.8	537	39.5	25.2
Moderate	16	17.8	257	18.9	18.0
Middle	7	7.8	122	9.0	19.5
Upper	5	5.6	112	8.2	37.3
Unknown	19	21.1	333	24.5	0.0
Total	90	100.0	1,361	100.0	100.0

*Source: 2025 FFIEC Census Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.*

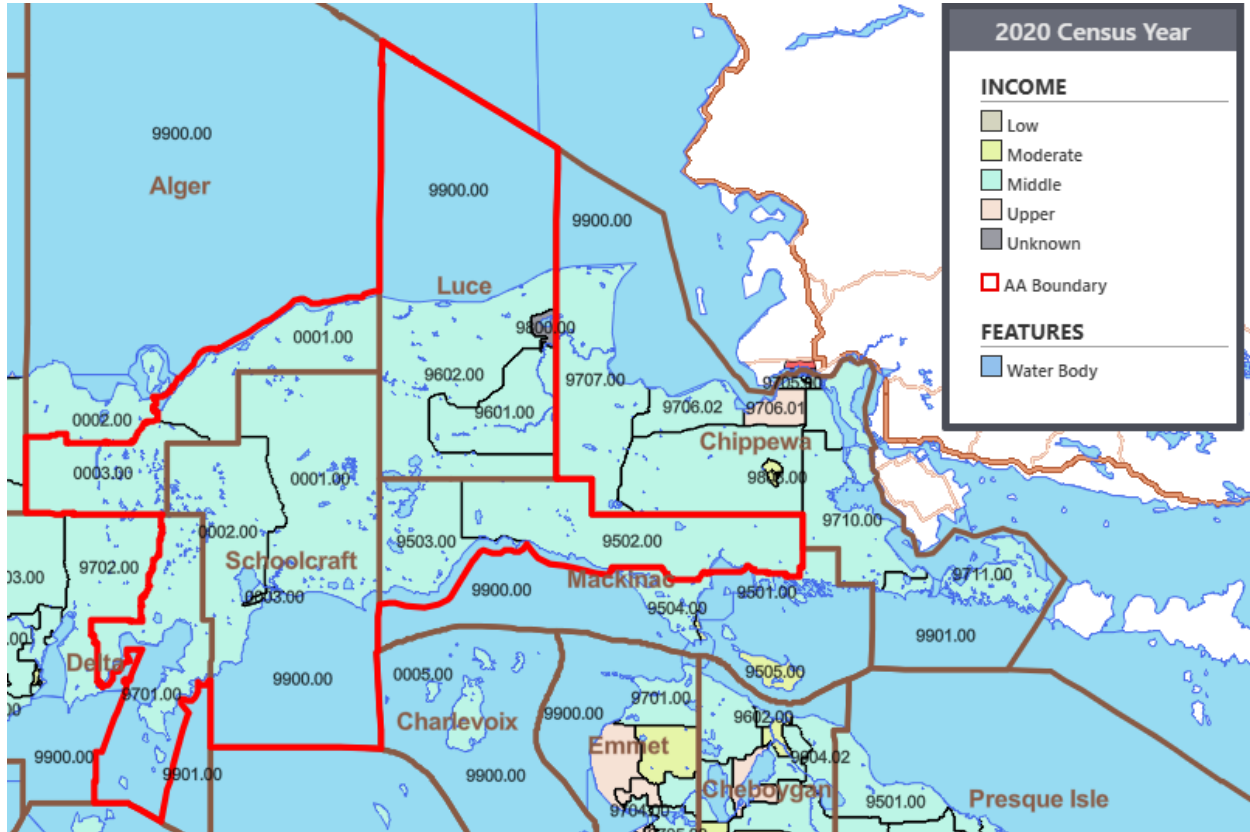
The bank’s consumer lending to low-income borrowers is significantly above demographics, which indicate that 25.2% of households in the AA are low income. The bank’s lending to moderate-income borrowers is comparable to demographics, which indicate that 18.0% of households in the AA are moderate income. The bank is willing to make small-dollar loans; of the consumer loans originated in the AA, 22.2% were for \$3,000 or less.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The examination did not reveal any evidence of violations of antidiscrimination laws or regulations (including Regulation B – Equal Credit Opportunity Act and the Fair Housing Act) or other illegal credit practices inconsistent with the bank helping to meet community credit needs.

APPENDIX A – MAP OF THE ASSESSMENT AREA

The State Savings Bank of Manistique AA



Office Locations (Manistique, Gulliver, and Curtis, Michigan)



APPENDIX B – DEMOGRAPHIC INFORMATION

2024 Manistique AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,317	18.9
Moderate	0	0.0	0	0.0	0	0.0	1,480	21.2
Middle	10	76.9	6,970	100.0	589	8.5	1,705	24.5
Upper	0	0.0	0	0.0	0	0.0	2,468	35.4
Unknown	3	23.1	0	0.0	0	0.0	0	0.0
Total AA	13	100.0	6,970	100.0	589	8.5	6,970	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	21,553	8,962	100.0	41.6	1,868	8.7	10,723	49.8
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	21,553	8,962	100.0	41.6	1,868	8.7	10,723	49.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,011	100.0	902	100.0	70	100.0	39	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,011	100.0	902	100.0	70	100.0	39	100.0
Percentage of Total Businesses:				89.2		6.9		3.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	70	100.0	64	100.0	5	100.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	70	100.0	64	100.0	5	100.0	1	100.0
Percentage of Total Farms:				91.4		7.1		1.4
<p>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</p>								

2025 Manistique AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,317	18.9
Moderate	0	0.0	0	0.0	0	0.0	1,480	21.2
Middle	10	76.9	6,970	100.0	589	8.5	1,705	24.5
Upper	0	0.0	0	0.0	0	0.0	2,468	35.4
Unknown	3	23.1	0	0.0	0	0.0	0	0.0
Total AA	13	100.0	6,970	100.0	589	8.5	6,970	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	21,553	8,962	100.0	41.6	1,868	8.7	10,723	49.8
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	21,553	8,962	100.0	41.6	1,868	8.7	10,723	49.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	941	100.0	847	100.0	63	100.0	31	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	941	100.0	847	100.0	63	100.0	31	100.0
Percentage of Total Businesses:			90.0		6.7		3.3	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	72	100.0	66	100.0	5	100.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	72	100.0	66	100.0	5	100.0	1	100.0
Percentage of Total Farms:			91.7		6.9		1.4	

Source: 2025 FFIEC Census Data
 2025 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX C – 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.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, 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.

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.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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