

A woman with long hair and glasses is sitting at a table, looking at a laptop screen. She is holding a document with a grid of images. The background is a blurred meeting room with other people. The text is overlaid on the image.

# COMMUNITY REINVESTMENT ACT PUBLIC FILE

CITIZENS BANK OF LAFAYETTE

2025

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

# 1 - Community Reinvestment Act Comments

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

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

## Current Year

January through March 2025

*None*

April through June 2025

*None*

July through September 2025

*None*

October through December 2025

*None*

## Previous Years

January through December 2023

*None*

January through December 2024

*None*

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

## 2 – Branch List

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

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

Citizens Bank of Lafayette CRA Public File  
January 2025

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

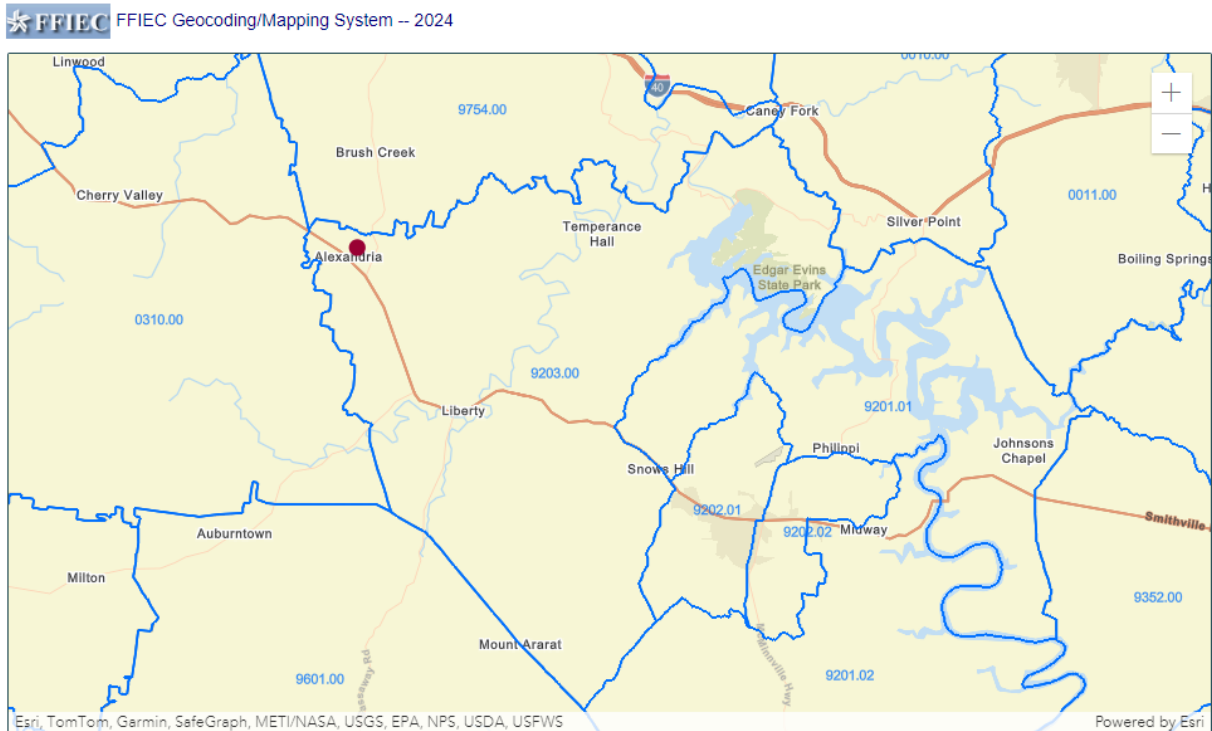
Citizens Bank of Lafayette CRA Public File  
January 2025

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

### 3 - Branch Locations and Census Tracts

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

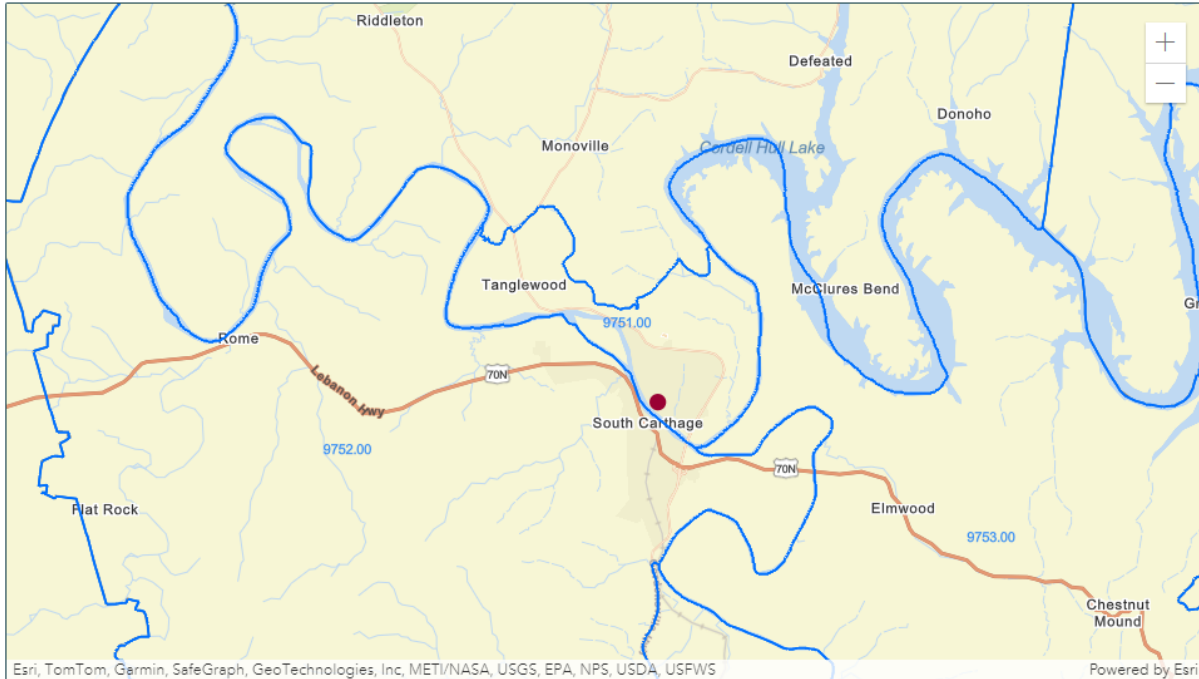
#### Branch Location I – Alexandria Branch (Alexandria Branch) 100 N Public Square Alexandria, TN 37012



● Matched Address: 100 N Public Sq, Alexandria, Tennessee, 37012  
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 041 - DEKALB COUNTY || Tract Code: 9203.00

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

FFIEC FFIEC Geocoding/Mapping System -- 2024

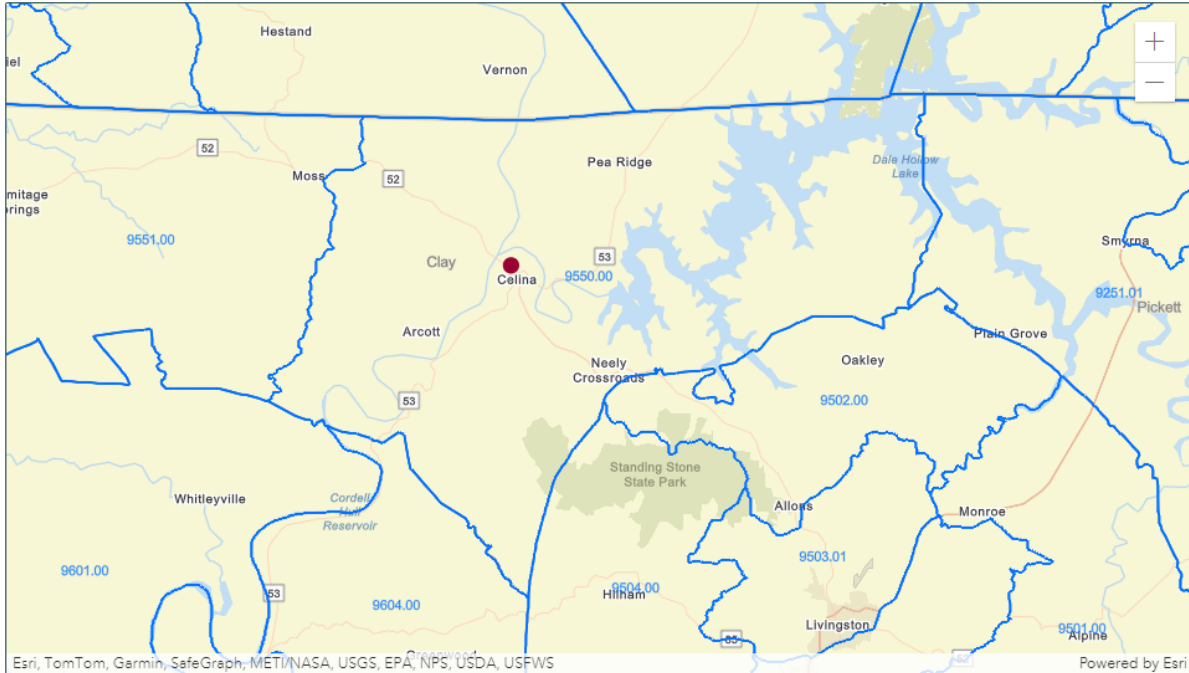


● Matched Address: 50 Main St N, Carthage, Tennessee, 37030  
MSA: 34980 - NASHVILLE-DAVIDSON--MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 159 - SMITH COUNTY || Tract Code: 9751.00



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

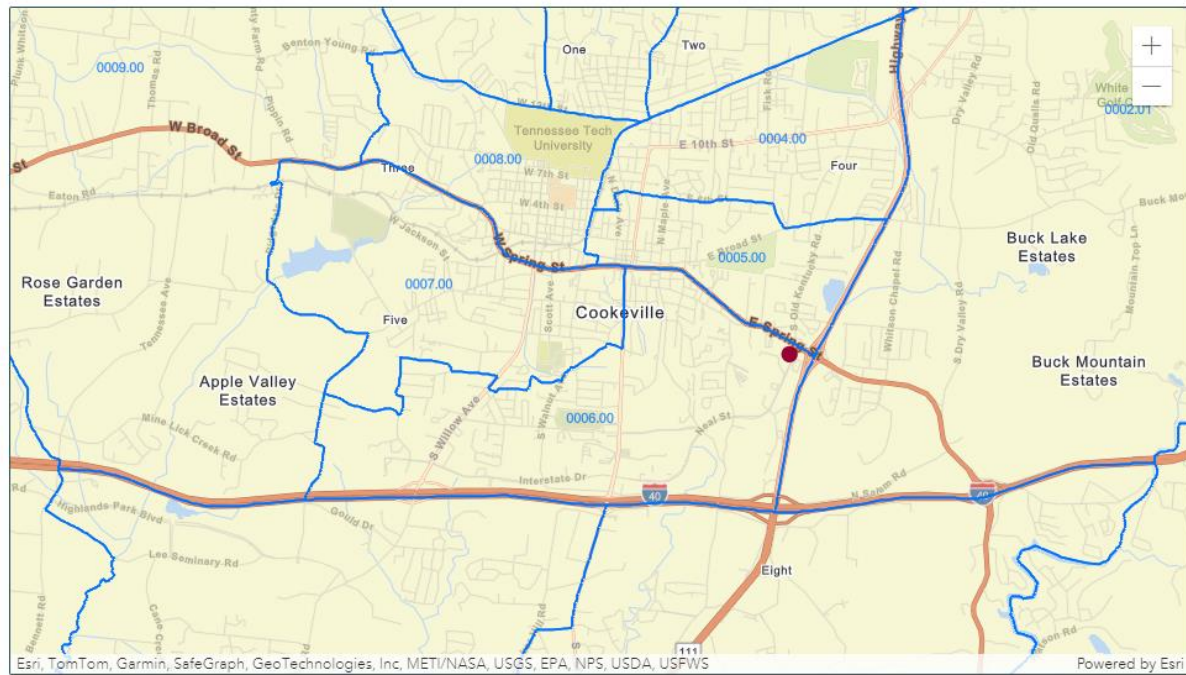
FFIEC FFIEC Geocoding/Mapping System -- 2024



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

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

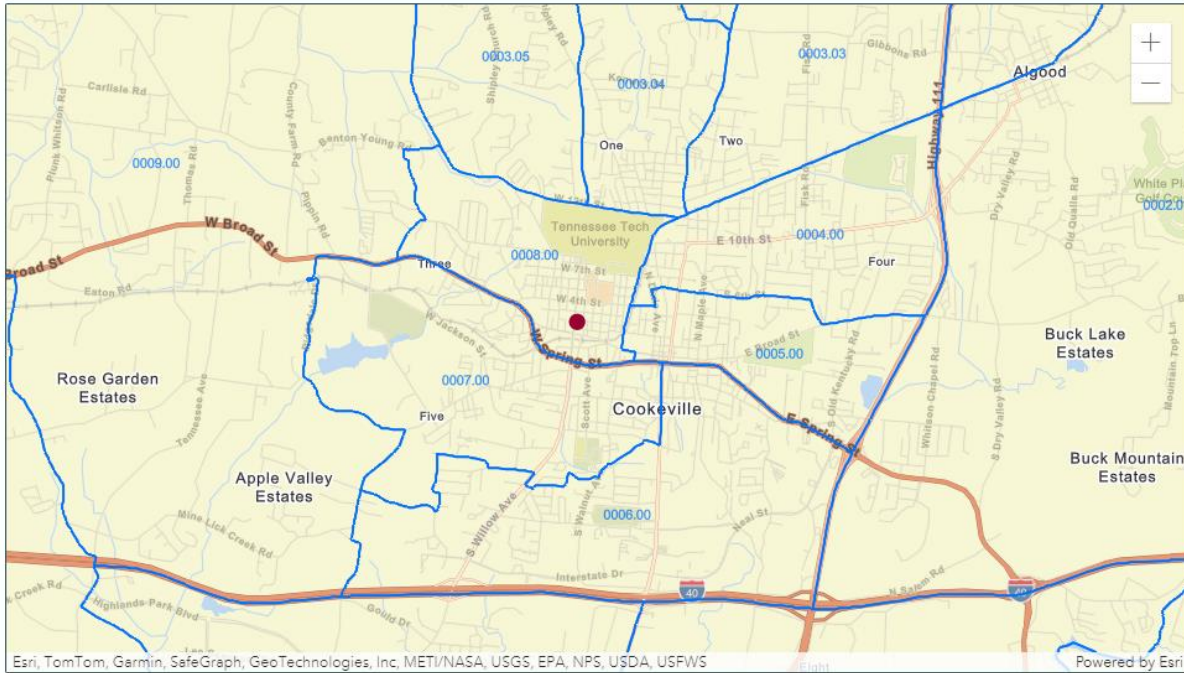
FFIEC FFIEC Geocoding/Mapping System – 2024



● Matched Address: 1450 Neal St, Cookeville, Tennessee, 38501  
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 141 - PUTNAM COUNTY || Tract Code: 0006.00

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

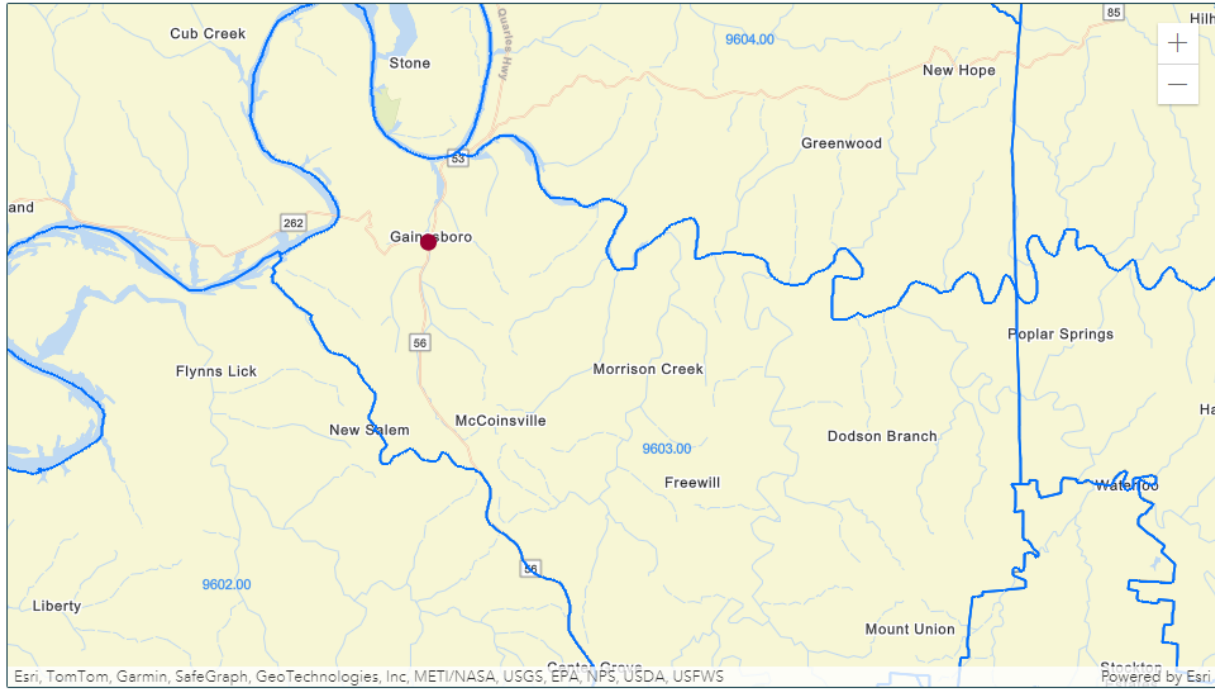
FFIEC FFIEC Geocoding/Mapping System -- 2024



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

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

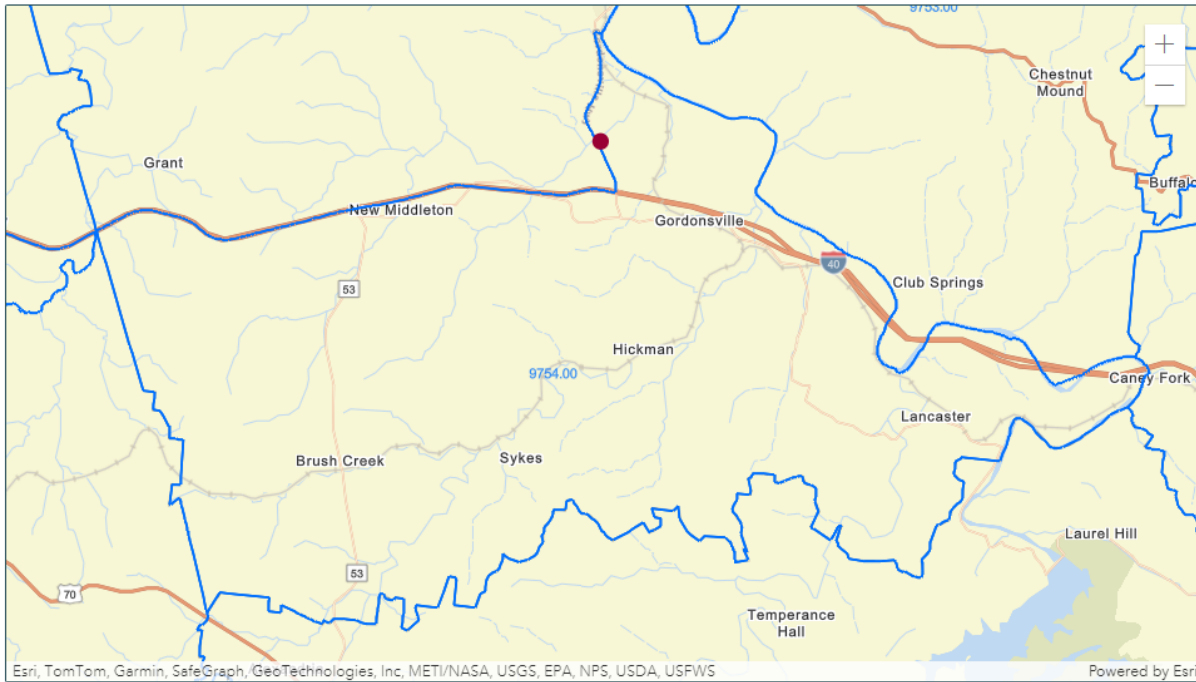
FFIEC FFIEC Geocoding/Mapping System -- 2024



● Matched Address: 116 S Grundy Quarles Hwy, Gainesboro, Tennessee, 38562  
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 087 - JACKSON COUNTY || Tract Code: 9603.00

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

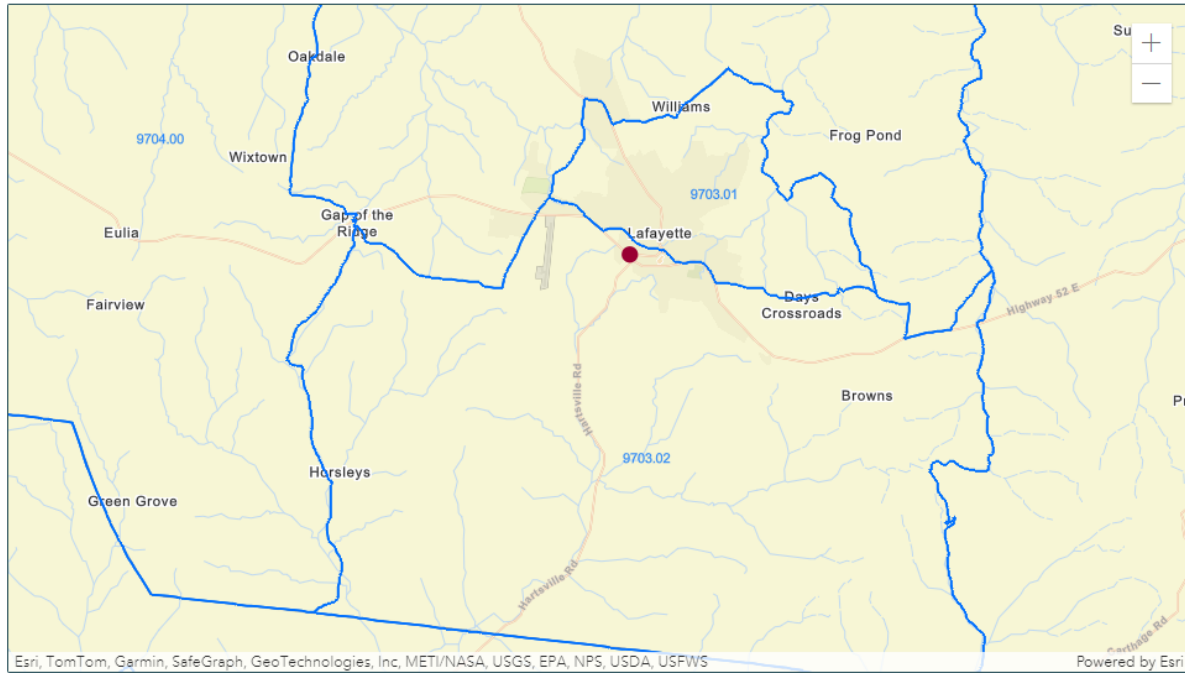
FFIEC FFIEC Geocoding/Mapping System -- 2024



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

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

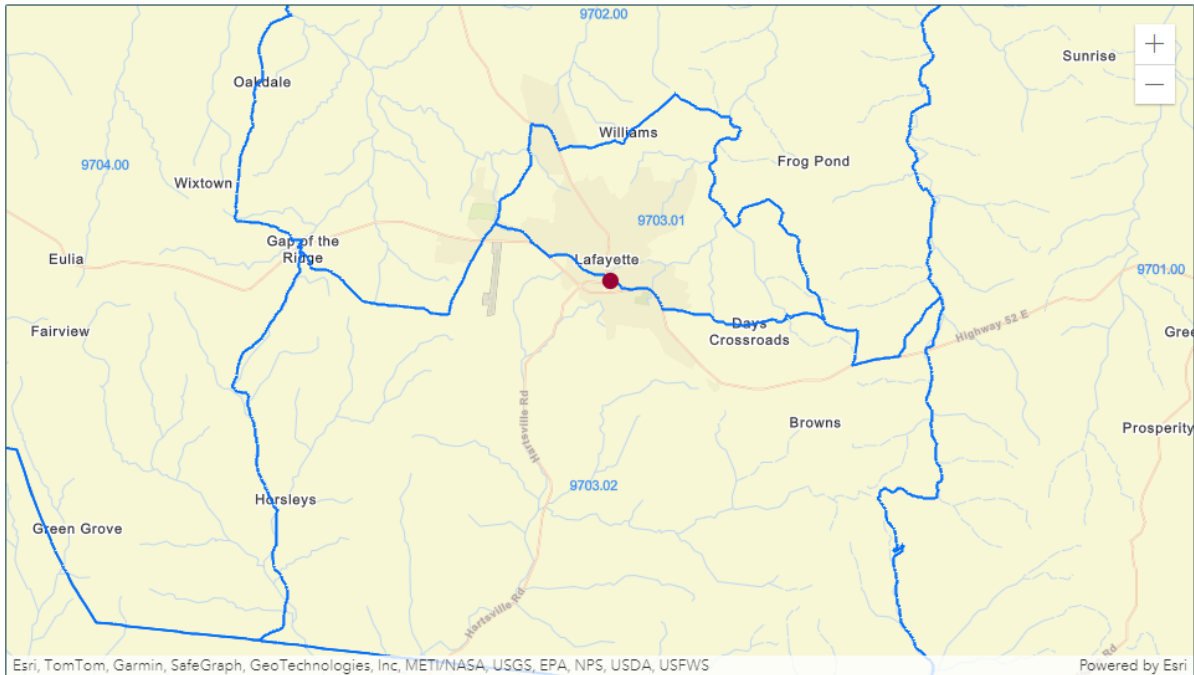
FFIEC FFIEC Geocoding/Mapping System – 2024



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

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

FFIEC FFIEC Geocoding/Mapping System -- 2024

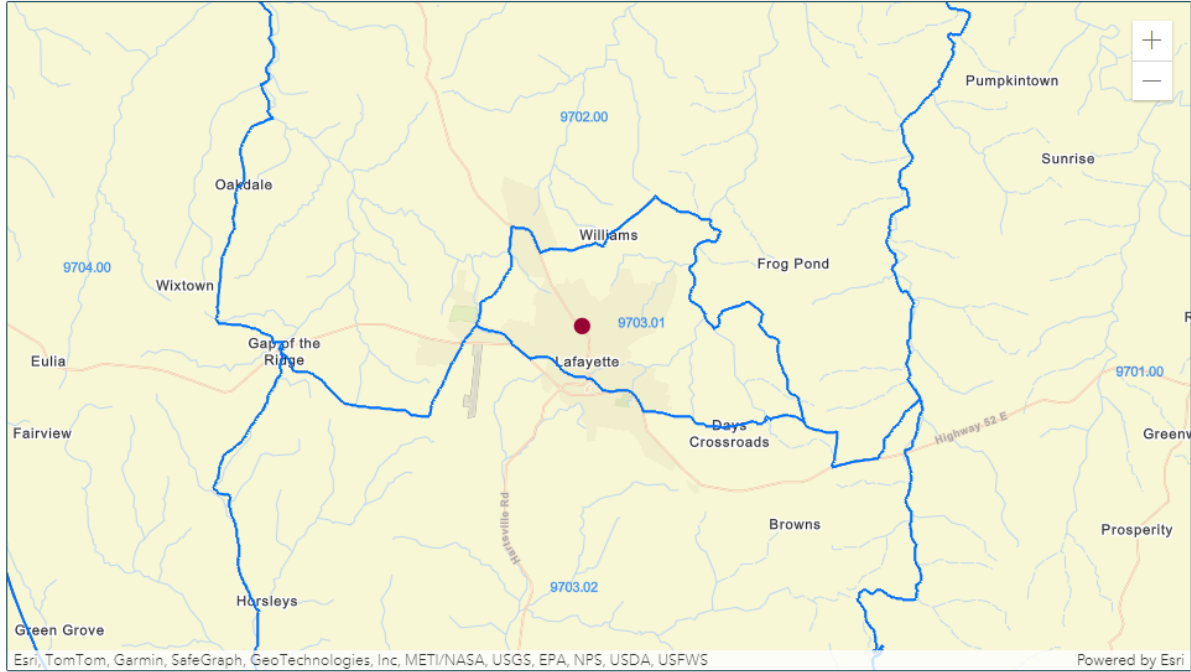


● Matched Address: 201 W Locust St, Lafayette, Tennessee, 37083  
MSA: 34980 - NASHVILLE-DAVIDSON--MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 111 - MACON COUNTY || Tract Code: 9703.02



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

FFIEC FFIEC Geocoding/Mapping System – 2024

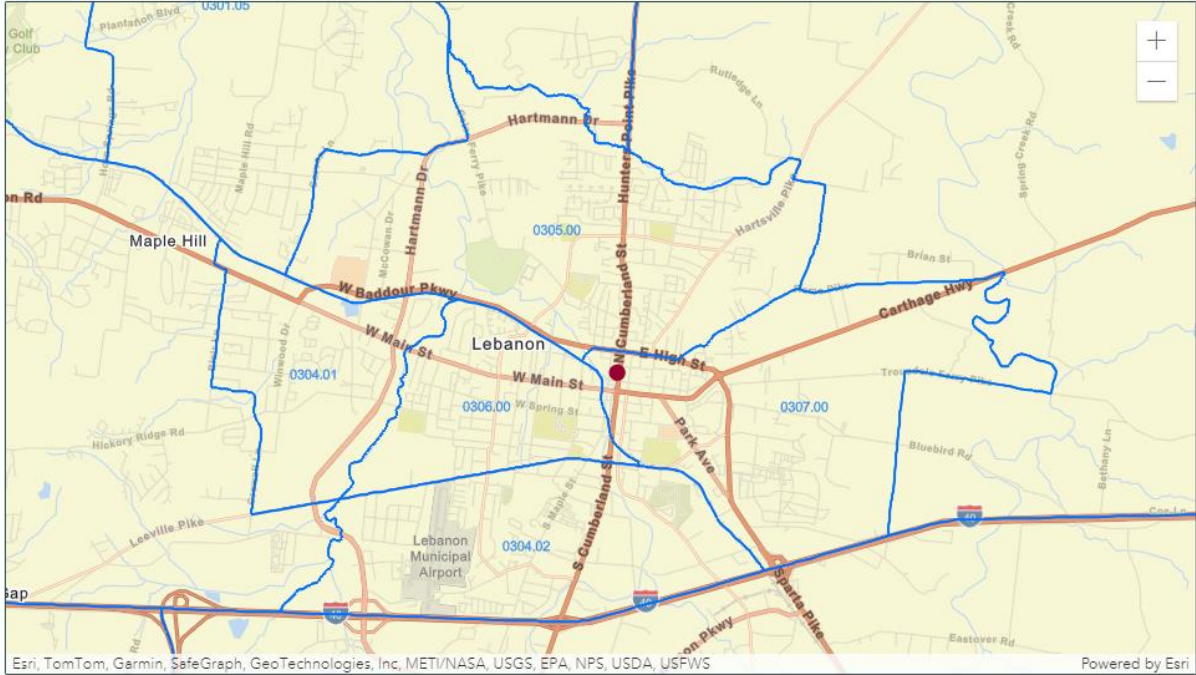


● Matched Address: 1108 Scottsville Rd, Lafayette, Tennessee, 37083  
MSA: 34980 - NASHVILLE-DAVIDSON-MURFREESBORO-FRANKLIN, TN || State: 47 - TENNESSEE || County: 111 - MACON COUNTY || Tract Code: 9703.01



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

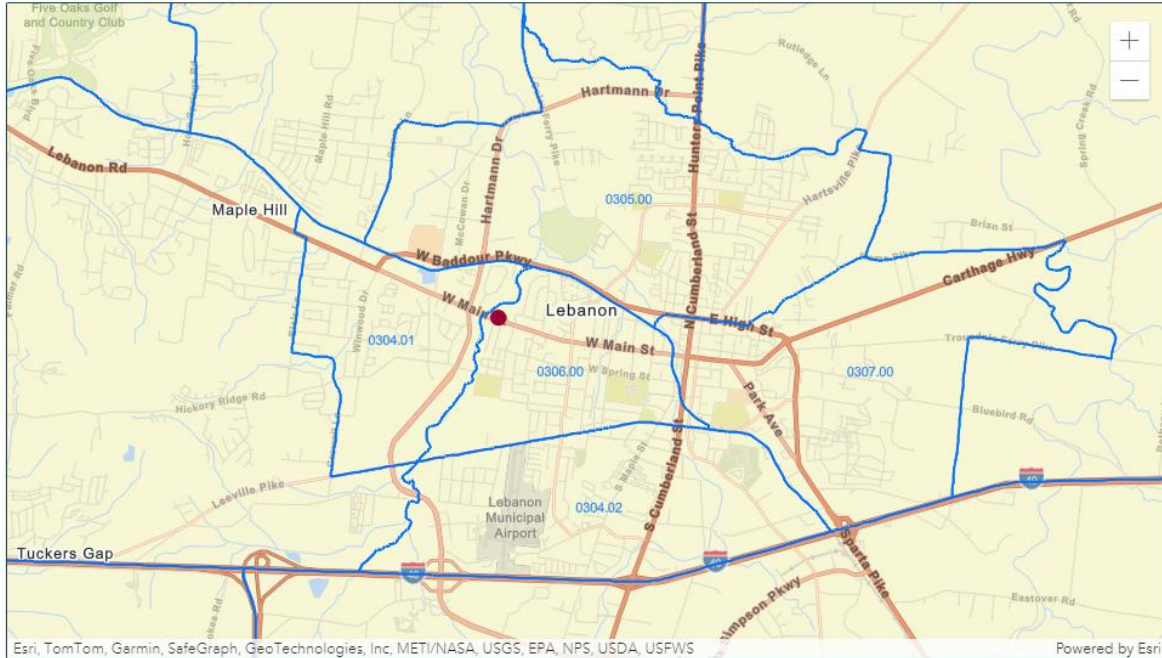
FFIEC FFIEC Geocoding/Mapping System -- 2024



● Matched Address: 214 N Cumberland St, Lebanon, Tennessee, 37087  
MSA: 34980 - NASHVILLE-DAVIDSON-MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 189 - WILSON COUNTY || Tract Code: 0307.00

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

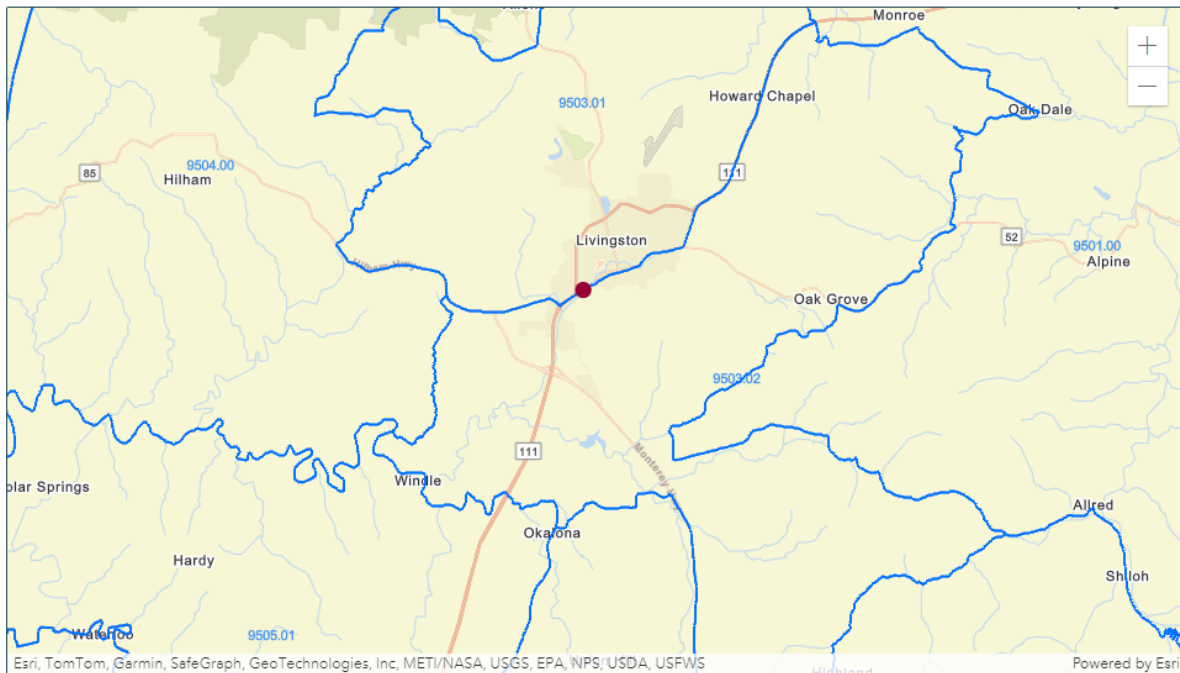
FFIEC FFIEC Geocoding/Mapping System -- 2024



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

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

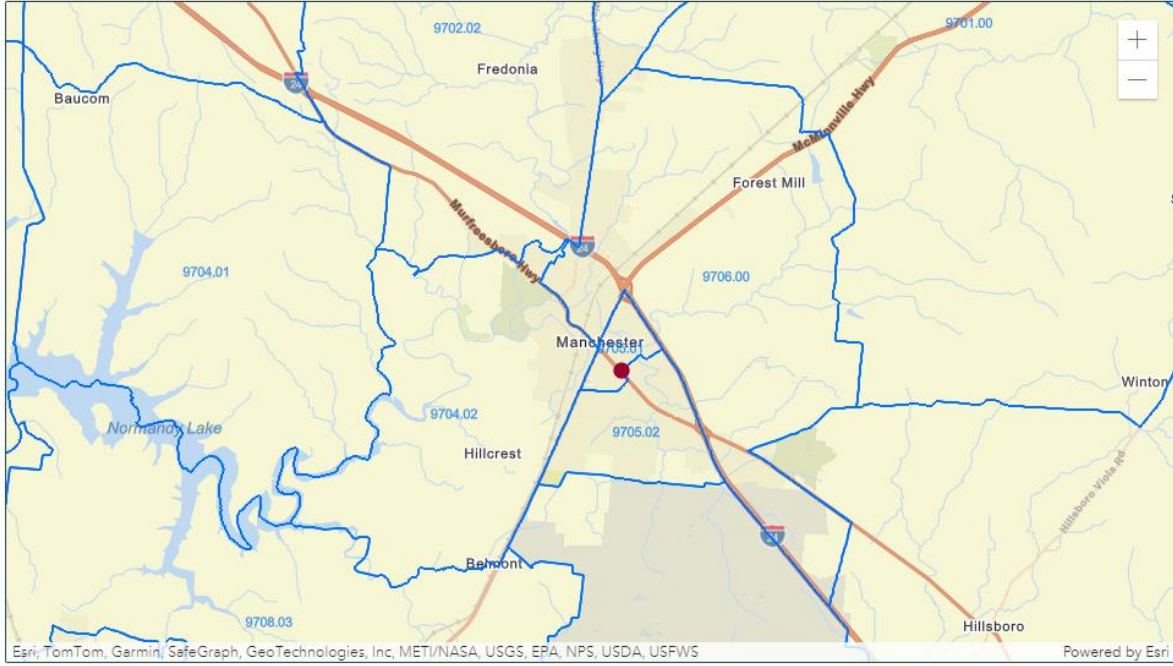
FFIEC FFIEC Geocoding/Mapping System – 2024



● Matched Address: 808 W Main St, Livingston, Tennessee, 38570  
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 133 - OVERTON COUNTY || Tract Code: 9503.01

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

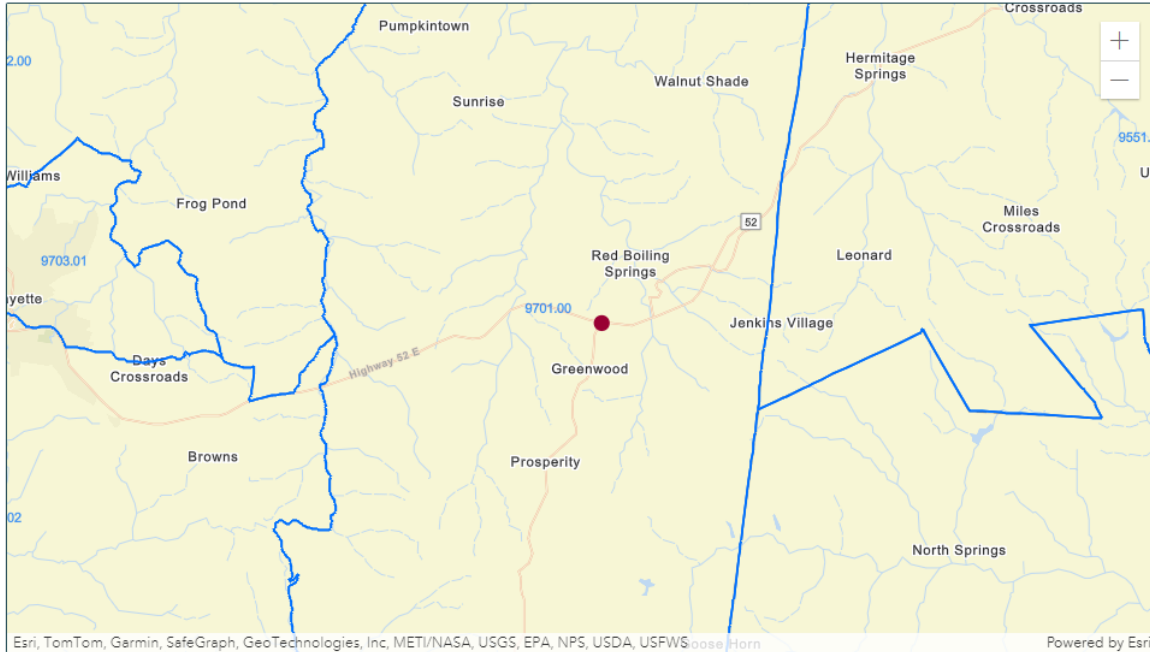
FFIEC FFIEC Geocoding/Mapping System -- 2024



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

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

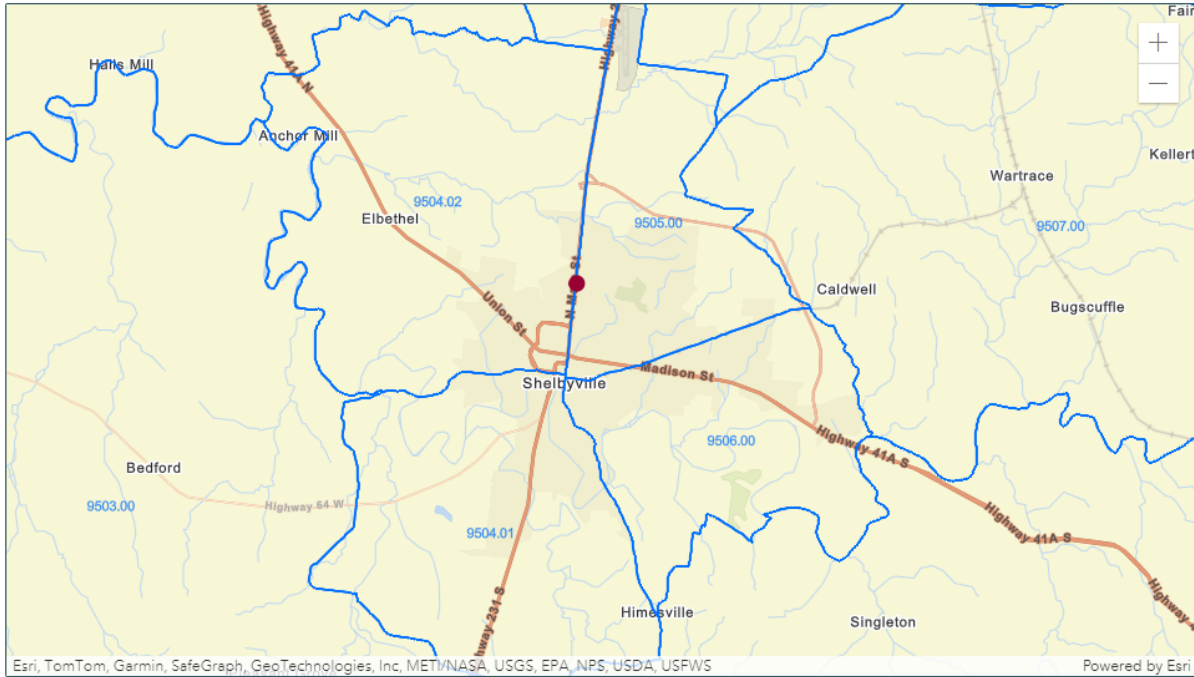
FFIEC FFIEC Geocoding/Mapping System -- 2024



● Matched Address: 32 Carthage Rd, Red Boiling Springs, Tennessee, 37150  
MSA: 34980 - NASHVILLE-DAVIDSON--MURFREESBORO--FRANKLIN, TN || State: 47 - TENNESSEE || County: 111 - MACON COUNTY || Tract Code: 9701.00

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

FFIEC FFIEC Geocoding/Mapping System -- 2024

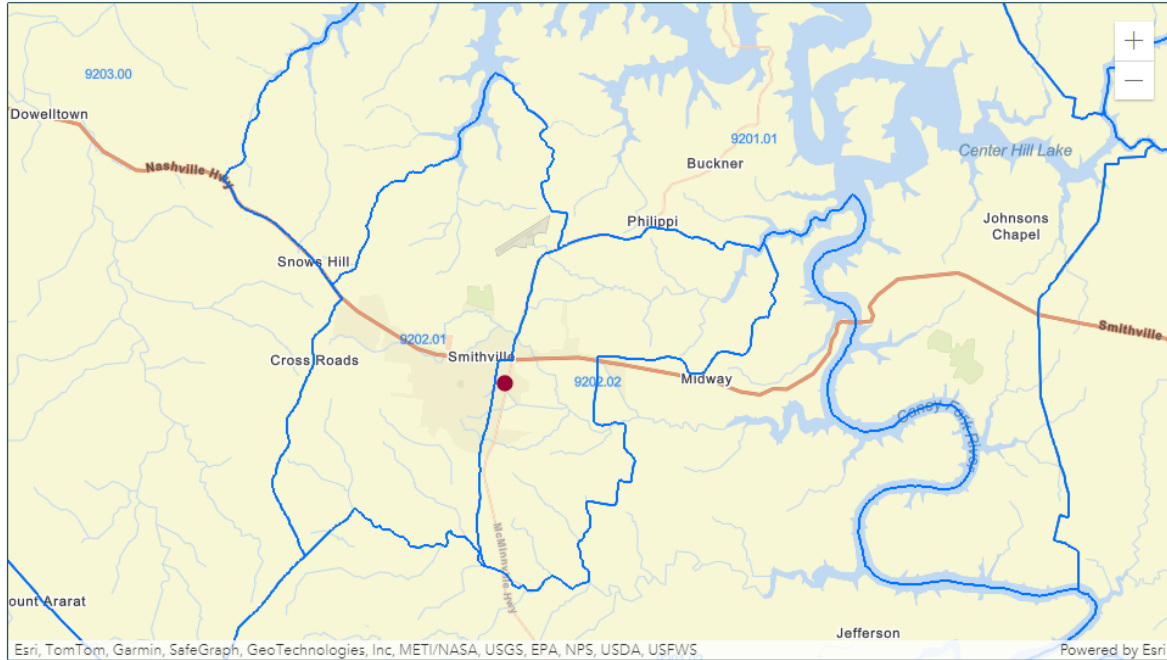


● Matched Address: 1602 N Main St, Shelbyville, Tennessee, 37160  
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 003 - BEDFORD COUNTY || Tract Code: 9505.00



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

FFIEC FFIEC Geocoding/Mapping System -- 2024



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

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

FFIEC FFIEC Geocoding/Mapping System -- 2024

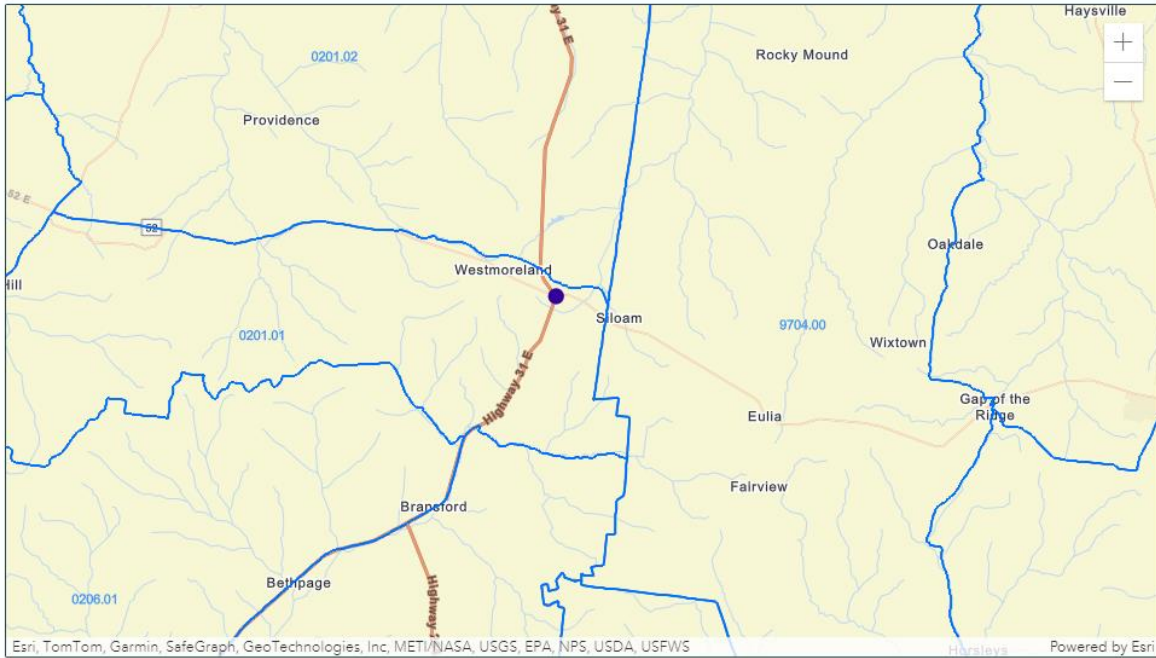


● Matched Address: 120 N Jackson St, Tullahoma, Tennessee, 37388  
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 031 - COFFEE COUNTY || Tract Code: 9708.01



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

FFIEC FFIEC Geocoding/Mapping System -- 2024



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

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

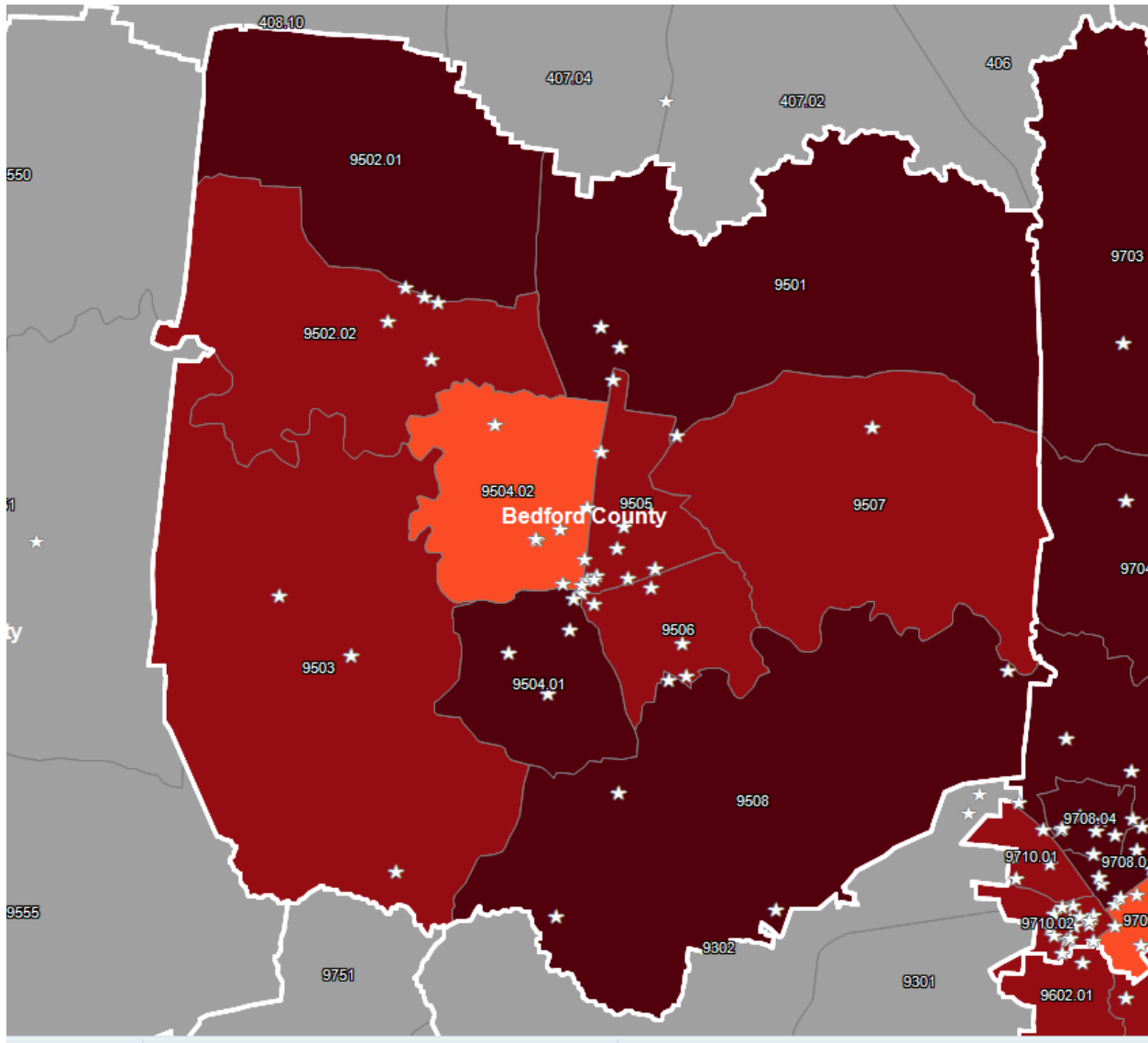
Branch Location XX – Winchester (Winchester Branch)  
2695 Decherd Blvd, Winchester, TN, 37398

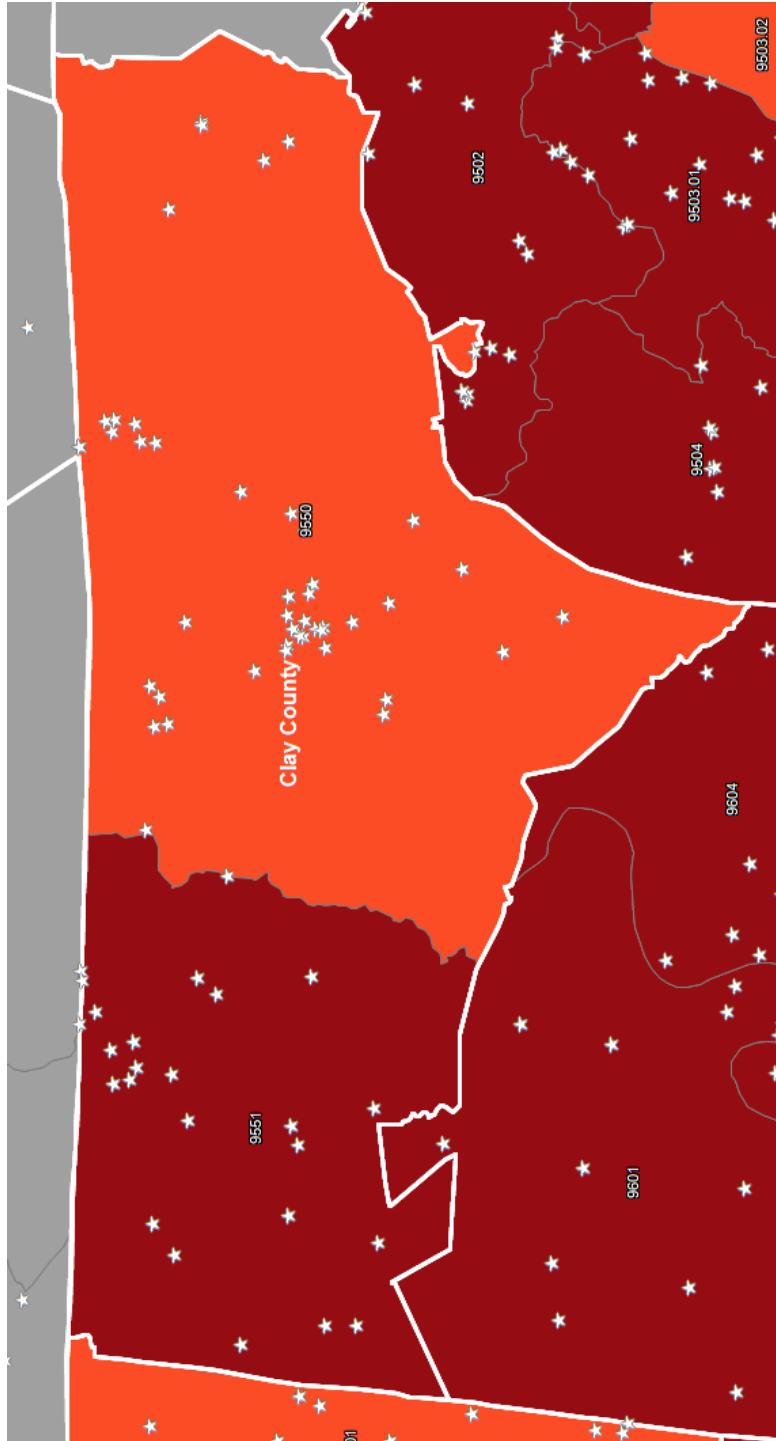
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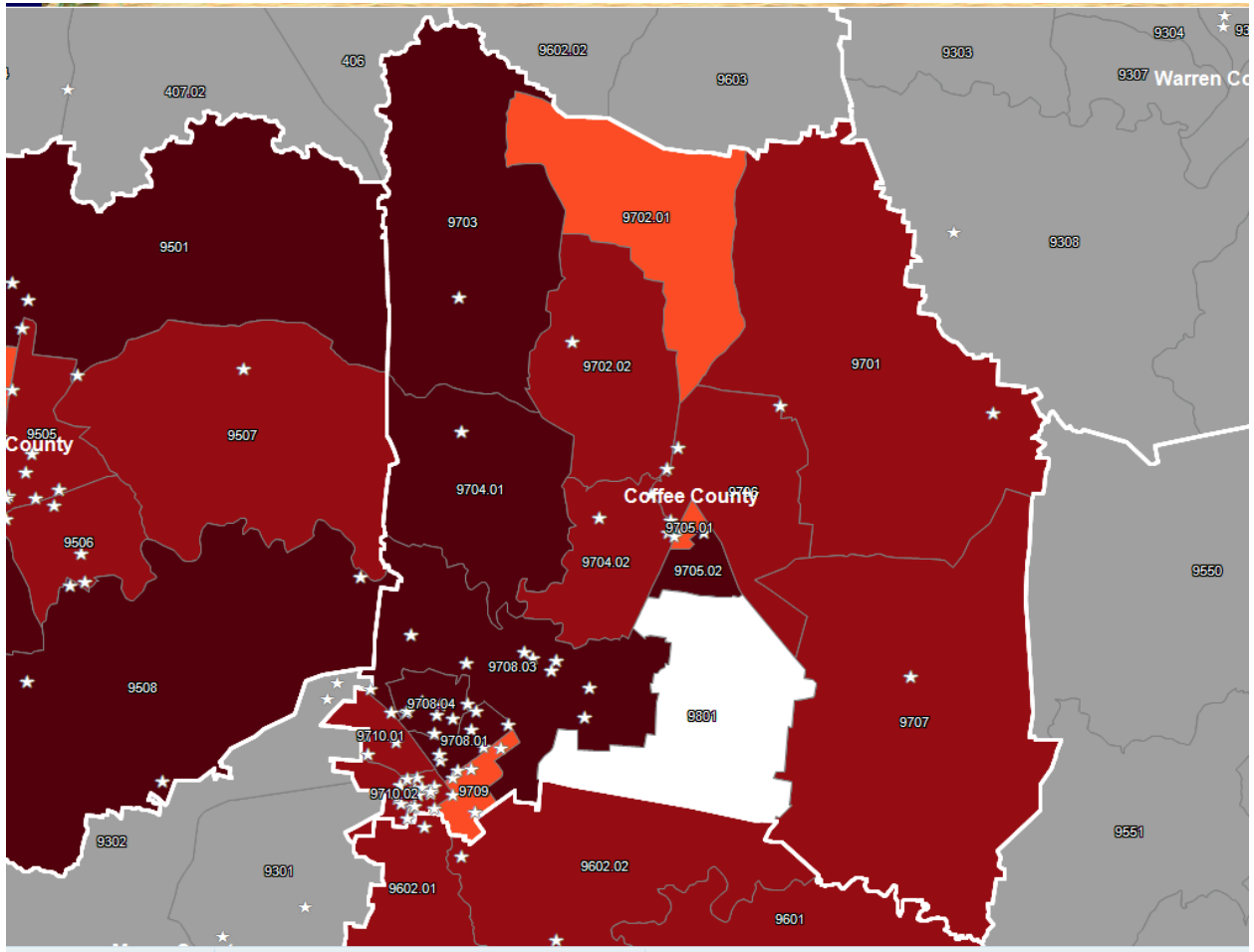


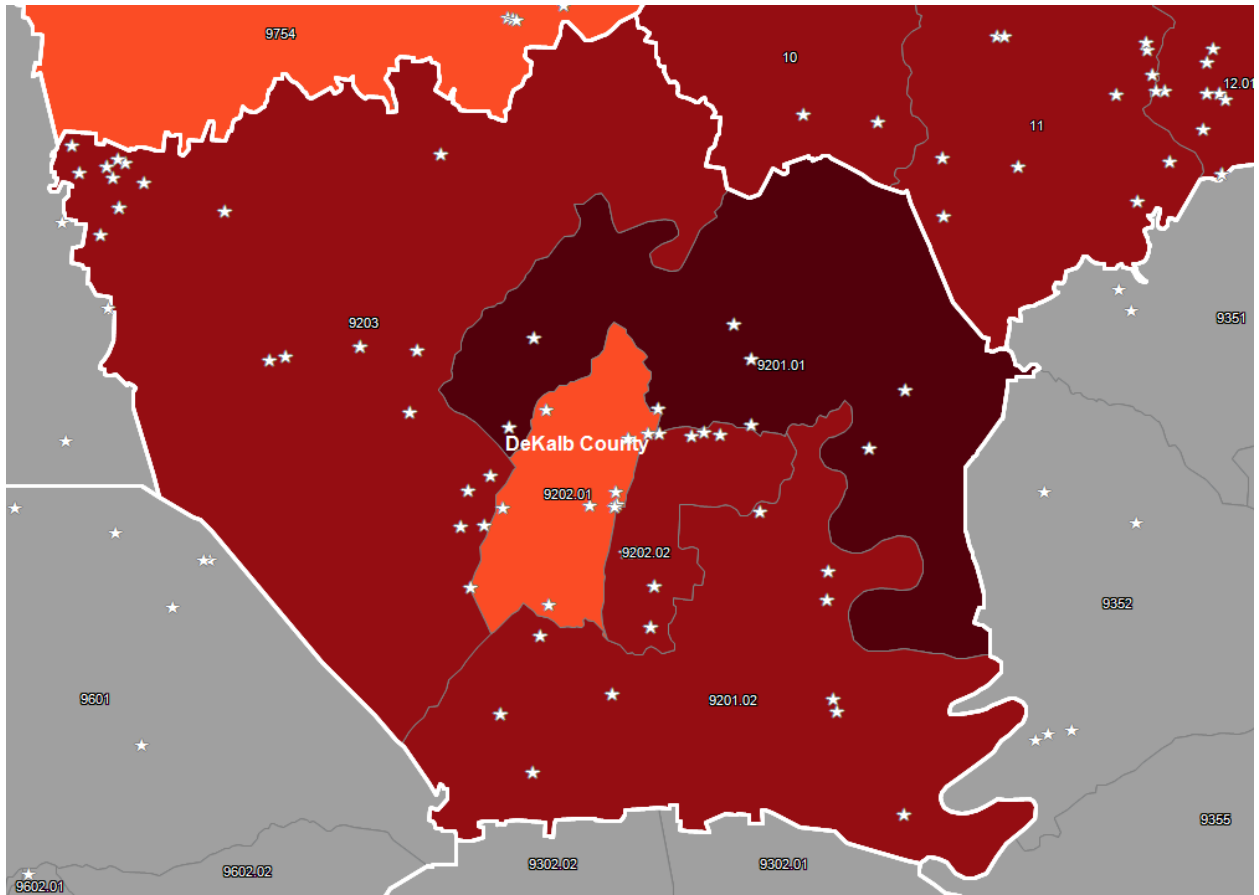
● Matched Address: 2695 Decherd Blvd, Winchester, Tennessee, 37398  
MSA: NA - NA (Outside of MSA) || State: 47 - TENNESSEE || County: 051 - FRANKLIN COUNTY || Tract Code: 9604.02

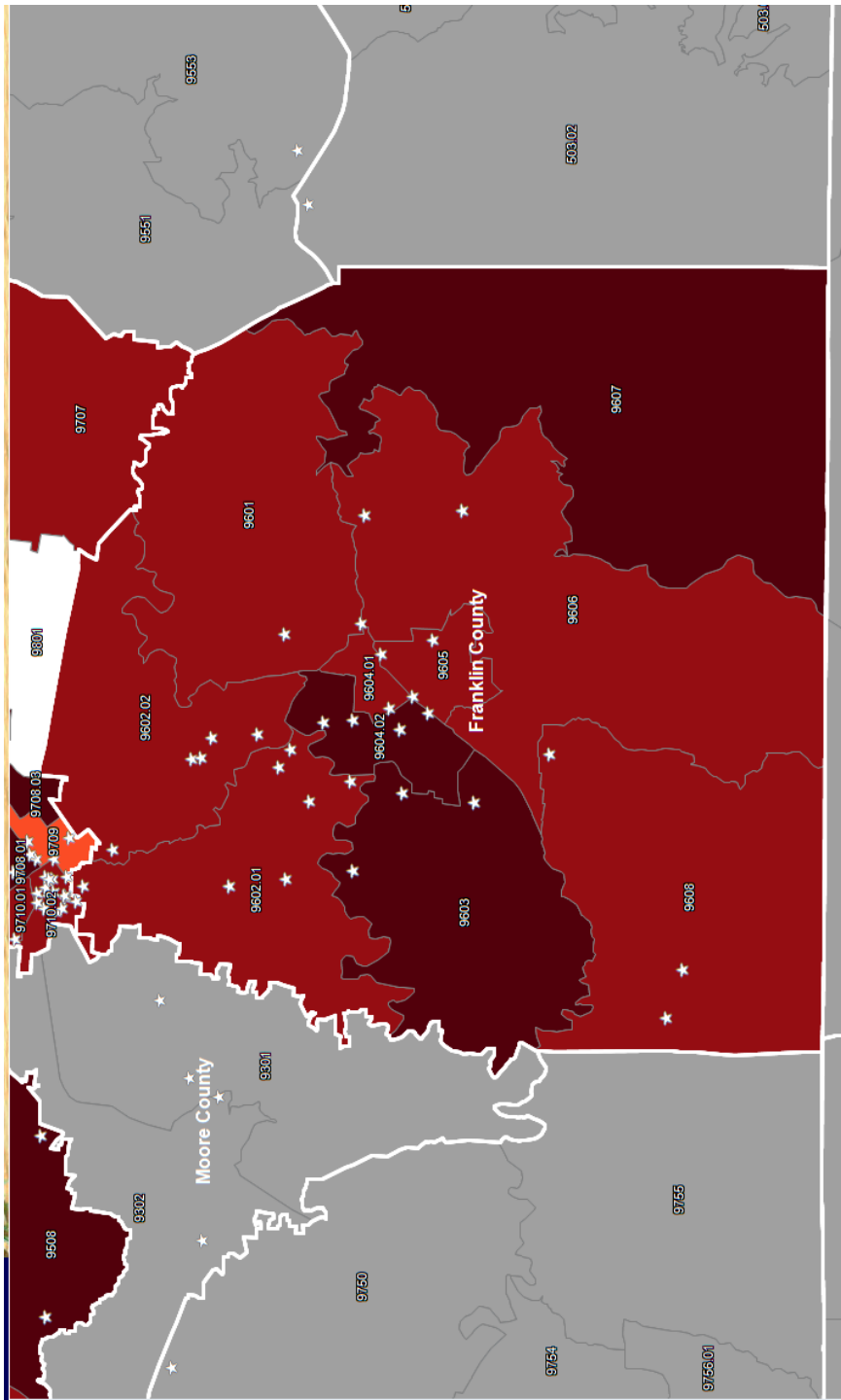
## 4 - Assessment Area and Census Tracts

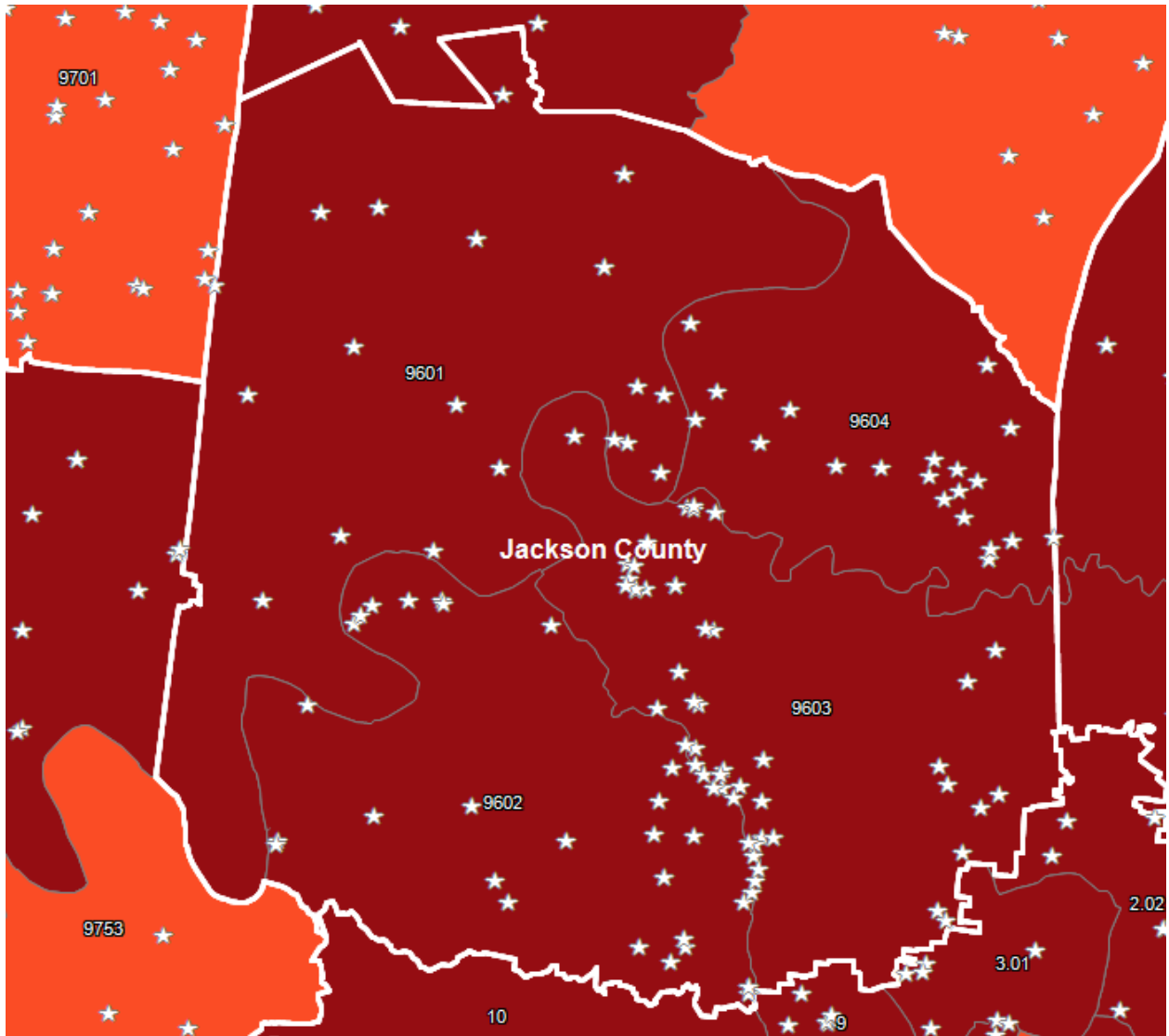




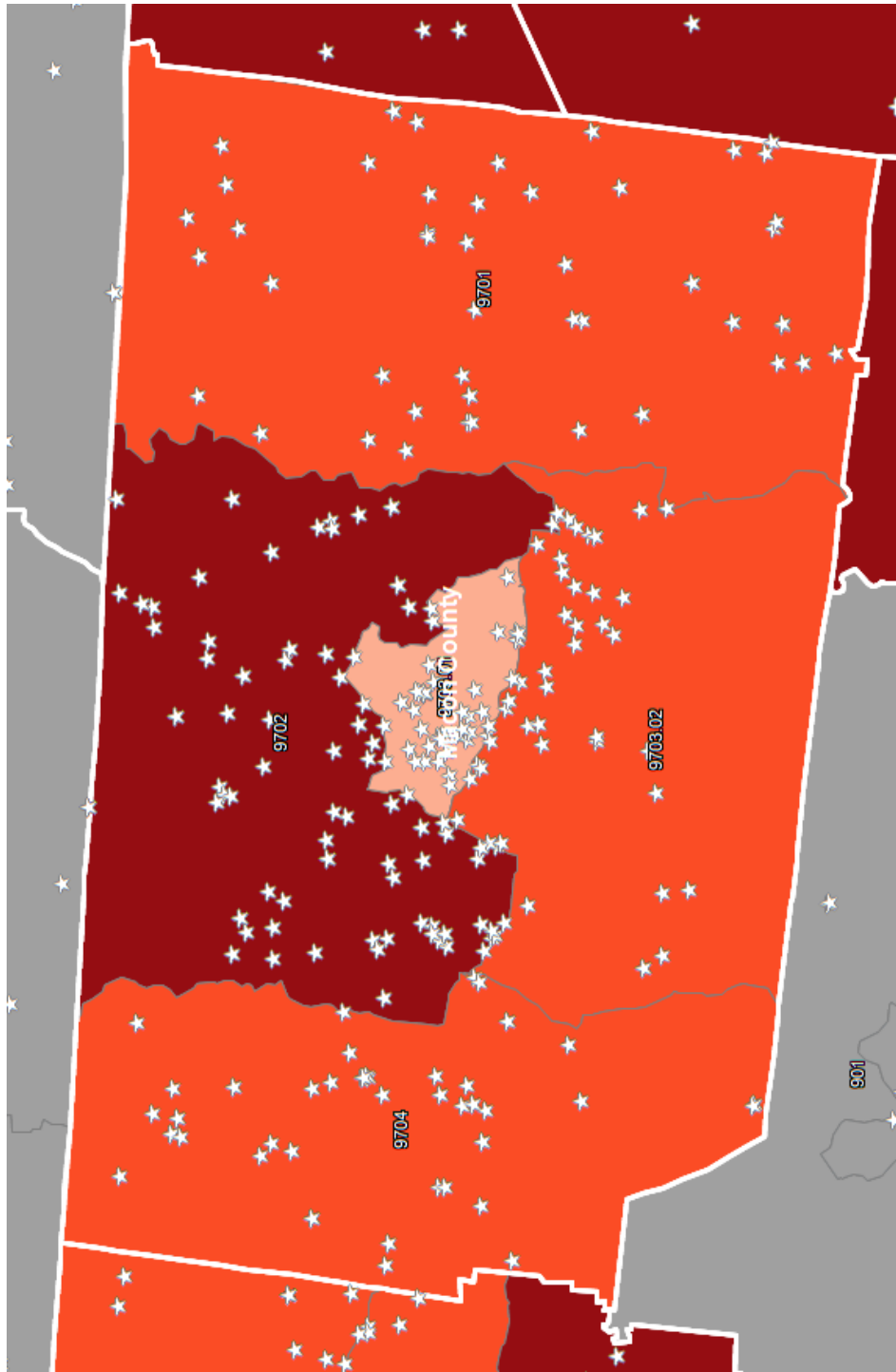


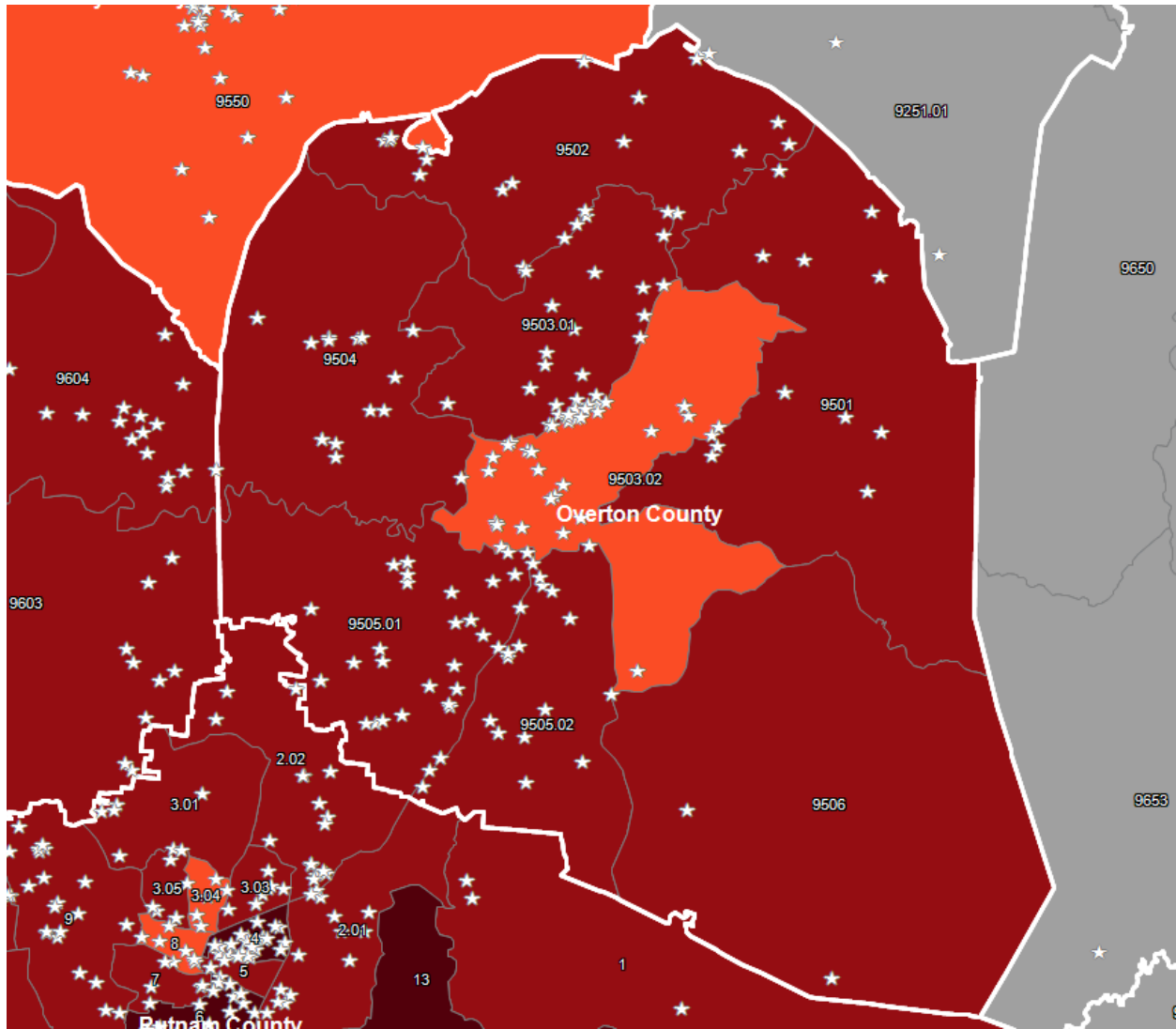


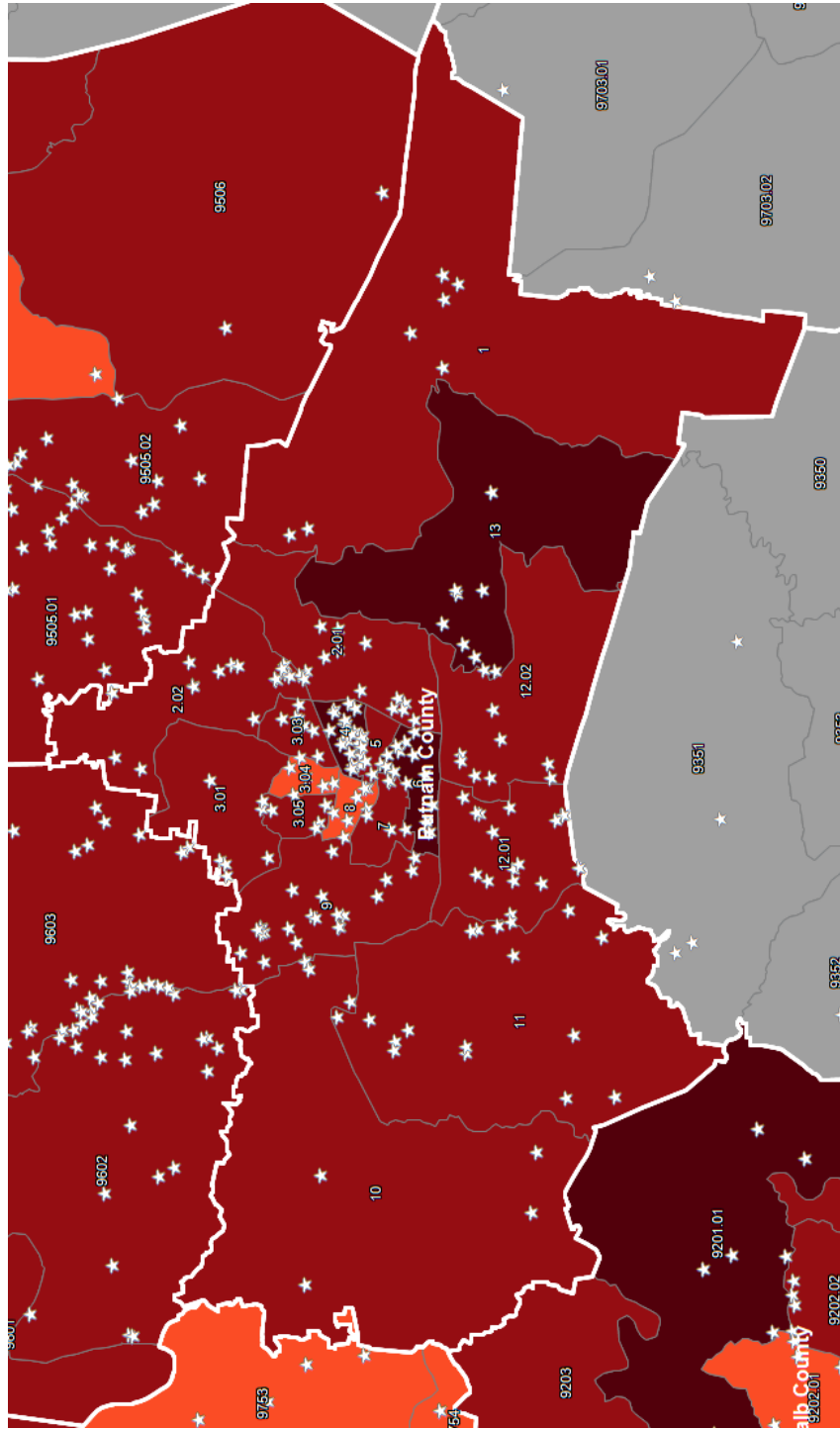


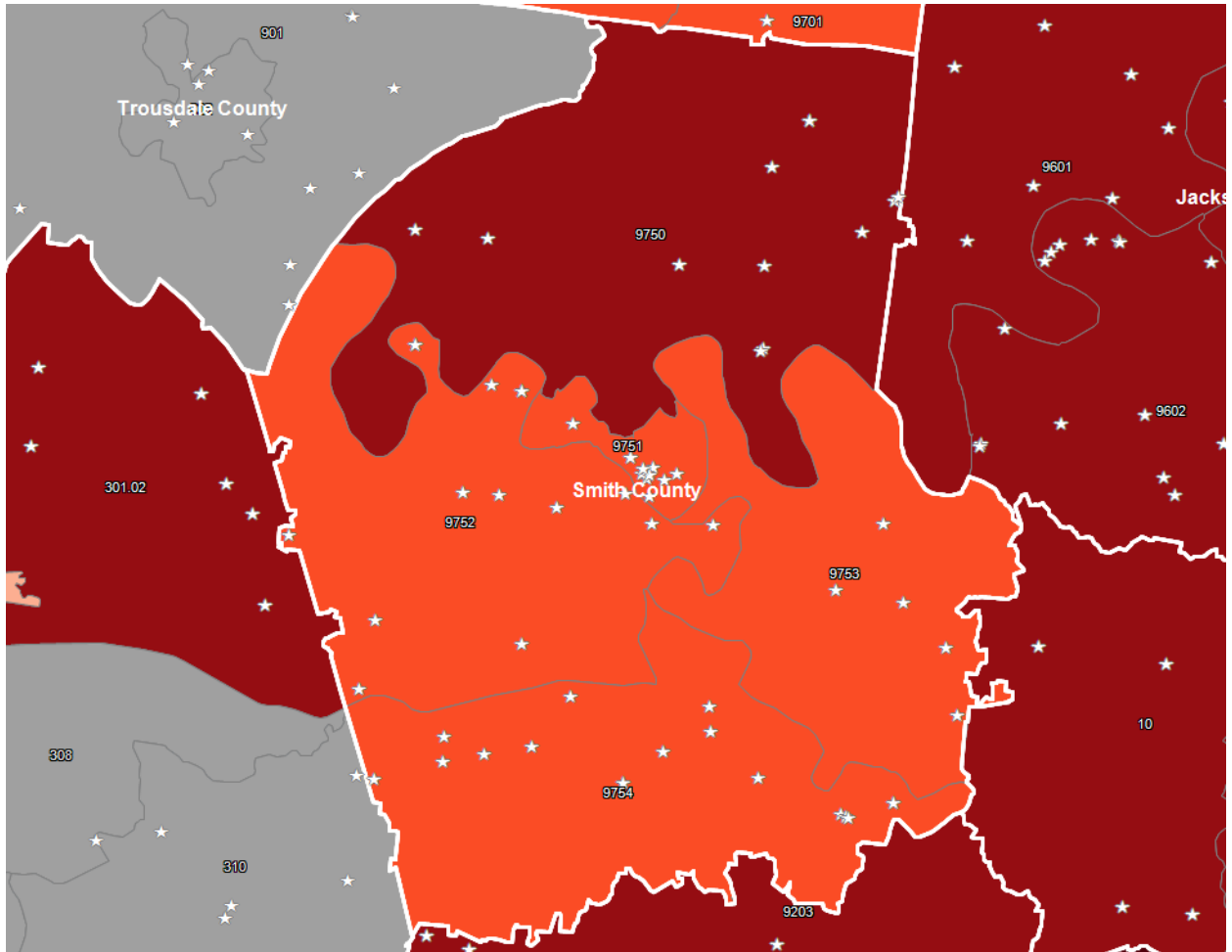


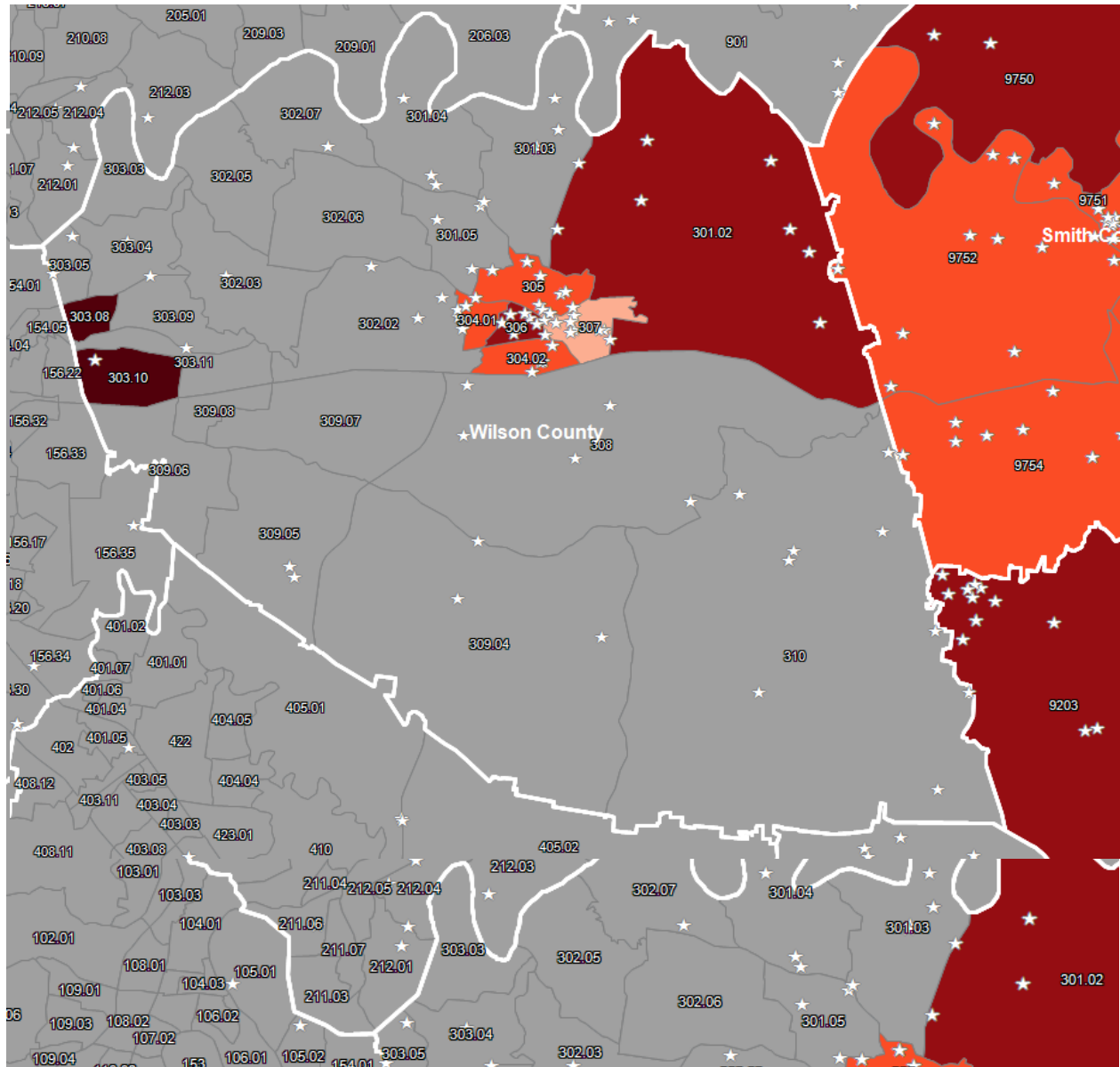














## 5 – Branch Opening and Closings

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

### 2025

January-March 2025

N/A

April-June 2025

N/A

July-September 2025

N/A

October-December 2025

N/A

### 2024

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

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

### 2023

No openings or closings

## 6 – Personal Banking Services

### Online & Mobile Banking



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

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

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



### Let's Get Building...

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

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



### Wondering How Much You Can Afford?

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

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

[View All Calculators](#)



## Personal Checking



CHOOSE SECURITY AND VALUE WITH...

### Citizens IDSecure Checking

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

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

### SECURITY AND VALUE FEATURES:

- Up to \$10,000 Identity Theft Expense Reimbursement Coverage<sup>2</sup> – to cover expenses associated with restoring your identity.
- Fully Managed Identity Theft Resolution Services – access to a dedicated fraud specialist assigned to manage your case until your identity is restored.
- Credit File Monitoring – daily credit file monitoring and automated alerts of key changes to your single bureau credit report. **(registration/activation required)**
- Identity Monitoring – Monitoring of more than 1,000 databases and public records to identify suspicious activity, including credit header information, phone records, United States Postal Service records, and more. A risk rating is generated with each monthly scan and if your scan reflects a high-risk score, you will be notified. **(registration/activation required)**
- Credit Report – ability to request a single bureau report every six months or upon opening a resolution case. **(registration/activation required)**
- Credit Score<sup>3,4</sup> – ability to request a single bureau score every month. **(registration/activation required)**
- Debit and Credit Card Registration - Register your credit, debit and ATM cards and have peace of mind knowing you can call one toll-free number to cancel and request replacement cards should your cards become lost or stolen. **(registration/activation required)**
- Credit Score Tracker<sup>4</sup> – Receive valuable insight into your credit score<sup>3</sup>
- Online Identity Theft News Center **and Valuable Phone and Web Resources (registration/activation required)**
- Financial Wellness 360° - Access your financial wellness platform with unlimited one-on-one coaching, interactive courses, videos, booklets, infographics, and more to help maximize financial wellness. **(available online only)**

### ADDITIONAL FEATURES:

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

**REGISTRATION AND ACTIVATION ARE EASY:**

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

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

Paper Statement Monthly Fee: \$3.00

\*\* OD disclosures apply

[Get Started](#)

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CHOOSE INTEREST WITH...

**Citizens Rewards Checking**

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

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

**CITIZENS REWARDS CHECKING FEATURES:**

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

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

Monthly Fee: \$3.95 (disappearing fee available)

Paper Statement Monthly Fee: \$3.00

\*\* OD disclosures apply

[Get Started](#)

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CHOOSE YOUR GOLDEN YEARS WITH...

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

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

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

**NEW BENEFITS:**

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

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

\*\* OD disclosures apply

[Get Started](#)

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CHOOSE A NEW BEGINNING WITH...

### Citizens SmartStart Checking & SmartStart Basic

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

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

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

Paper Statement Monthly Fee: \$3.00

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

[Get Started](#)

## Personal Savings

### Regular Savings

Regular Savings is an interest bearing account.

*Minimum Deposit to Open: \$10*

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

#### Comments

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

#### [Get Started](#)

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### SaveUp Savings

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

*Minimum Deposit to Open: \$10*

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

#### Comments

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

#### [Get Started](#)

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### Money Market Savings

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

*Minimum Deposit to Open: \$2,500*

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

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

*Service Charge: \$5*

#### Comments:

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

#### [Get Started](#)

### Kids Club Savings

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

*Minimum Deposit to Open: \$5*

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

#### Comments

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

### [Get Started](#)

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### Christmas Club Savings

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

*Minimum Deposit to Open: \$10*

*Withdrawals Allowed: 1 (checks mailed in November)*

*Service Charge: \$10 fee for early withdrawal*

#### Comments:

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

### [Get Started](#)

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### Vacation Club Savings

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

*Minimum Deposit to Open: \$10*

*Withdrawals Allowed: 1 (checks mailed in May)*

*Service Charge: \$10 fee for early withdrawal*

#### Comments

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

### [Get Started](#)

## Personal CDs & IRAs

### Certificate of Deposit (CD)

*Minimum Deposit to Open: \$2,500*

*Service Charge: Early withdrawal penalties apply*

Comments:

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

### Individual Retirement Account (IRA)

*Minimum Deposit to Open: \$500*

*Service Charge: Early withdrawal penalties apply*

Comments:

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

### Roth IRA

*Minimum Deposit to Open: \$500*

*Service Charge: Early withdrawal penalties apply*

Comments:

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

### Educational IRA

*Minimum Deposit to Open: \$500*

*Service Charge: Early withdrawal penalties apply*

Comments:

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



## Personal Debit Cards

### No More Waiting With Card@Once

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

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

### Which Card Is Right For You?

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

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

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

#### School Card

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

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





Citizens Bank of Lafayette CRA Public File  
January 2025





### Regular Debit

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

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



### Real Time Debit/ATM Processing

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

How does Real Time processing benefit you?

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

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

### Benefits for Debit MasterCard® (enhanced)

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

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

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

## Personal Credit Cards - Consumer

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

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

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

### [APPLY NOW](#)

#### Credit Card Member Services

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

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

## Personal Overdraft Privilege

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

### What You Need to Know About Overdrafts and Overdraft Fees

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

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

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

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

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

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

- ATM transactions
- Everyday debit card transactions
- 

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

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

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

Under our standard overdraft practices:

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

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

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

[Opt In Now](#)

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

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

**Deminimus Amount:**

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

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

**[Overdraft Privilege Disclosure](#)**



## Personal Services

### ATMs

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

Visit [www.moneypass.com](http://www.moneypass.com) to find out more.

### Bank by Mail

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

### Cashier Checks

Cashier checks can be purchased at any of our branches.

### Debit Card

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

### Image Statements

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

### Linked Accounts

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

### Mobile App

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

### Mobile Check Deposit

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

### Night Depository

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

### Overdraft Privilege

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

### Notary Service

This service is available at no charge to our customers.

### Safe Deposit Box

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

### Telephone Banking

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

### Wire Transfers

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

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



## Real Time Processing

### Real-Time Debit Card Transaction Processing

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

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

### How it Works

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

### Debit Card Authorization Vs. Posted Transaction

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

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

### Checks & Deposits

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

### Enhanced Security

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

### Contact Us

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

## Personal Loans

### Consumer

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

#### Comments:

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

[\*\*Get Started\*\*](#)

## Mortgages

### Adjustable Rate Mortgage

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

#### Comments:

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

[\*\*Get Started\*\*](#)

### Conventional Fixed Rate Mortgage

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

#### Comments:

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

- *Easier to budget and plan for.*

### [Get Started](#)

#### Freedom Line of Credit

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

#### Comments:

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

### [Get Started](#)

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

#### Construction

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

#### Comments:

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

### [Get Started](#)

#### Agriculture

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

#### Comments:

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

### [Get Started](#)

## 7 – Business Banking Services

### Online & Mobile Banking



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

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

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



### Let's Get Building...

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

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



### Wondering How Much You Can Afford?

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

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

[View All Calculators](#)

## Business Checking

Features to Meet Your Needs. Accounts to Match Your Goals.



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



01-08 07/2021

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

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



Think Small Business with...

### Advisor Checking

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

#### FEATURES

- Business Debit Mastercard<sup>1</sup>
- Online Banking
- Get 100 combined paper and electronic transactions<sup>2</sup>
- Mobile Banking
- 24/7 on-demand eStatement<sup>3</sup>
- Overdraft Privilege Protection available
- No Monthly Service Fee
- Bundle Options available
- Only \$25 Deposit to Open

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



Think Medium Business with...

### **Manager Checking**

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

#### **FEATURES**

- Business Debit Mastercard<sup>1</sup>
- Online Banking
- Get 250 combined paper and electronic transactions<sup>2</sup>
- Dedicated Loan and Deposit Specialist
  
- Card Services Representative
- Mobile Banking
- 24/7 on-demand eStatement<sup>3</sup>
- Overdraft Privilege Protection available
- Lines of Credit available
- Minimum balance of \$5,000 to avoid monthly service fee of \$5.00
- Bundle Options available
- Only \$25 Deposit to Open

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

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Think Interest with...

### **President Checking**

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

#### **FEATURES**

- Business Debit Mastercard<sup>1</sup>
- Online Banking
- Get 250 combined paper and electronic transactions<sup>2</sup>
- Dedicated Loan and Deposit Specialist
  
- Card Services Representative
- Mobile Banking
- 24/7 on-demand eStatement<sup>3</sup>

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

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

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Think Large Business with...

### **Director Checking**

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

#### **FEATURES**

- Business Debit Mastercard<sup>1</sup>
- Online Banking
- Dedicated Loan and Deposit Specialist
  
- Card Services Representative
- Mobile Banking
- 24/7 on-demand eStatement<sup>3</sup>
- Lines of Credit available
- Analysis of Charges with an Earnings Credit
- \$15.00 Monthly Service Fee plus \$0.05 per item deposited charge and \$0.10 per check charge.
- Cash Management Solutions available
- Only \$25 Deposit to Open

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

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

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Think Public Entities with...

### **Government Checking**

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



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

#### FEATURES

- Business Debit Mastercard<sup>1</sup>
- Online Banking
- Business Service Representative
- Mobile Banking
- 24/7 on-demand eStatement<sup>3</sup>
- Analysis of Charges with an Earnings Credit
- \$15.00 Monthly Service Fee plus \$0.05 per item deposited charge and \$0.10 per check charge.
- Cash Management Solutions available
- Only \$25 Deposit to Open

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

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

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Think Civic Organizations with...

#### **Community Checking**

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

#### FEATURES

- Business Debit Mastercard<sup>1</sup>
- Online Banking
- Get 100 combined paper and electronic transactions<sup>2</sup>
- Mobile Banking
- 24/7 on-demand eStatement<sup>3</sup>
- No Monthly Service Fee
- Bundle Options available
- Only \$25 Deposit to Open

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

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Add These Business Services with...

#### **Bundle Options**

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

**SAVER BUSINESS BUNDLE - \$3.95 Per Month**

- Unlimited Mobile Deposit - Mobile check deposit allows you to save time by depositing your checks remotely, no matter where you are or what time of day it is. Instead of making a run to the bank, you can simply snap a picture of the front and back of the check on your smartphone and deposit it using the bank's mobile app.
- Limited BillPay<sup>4</sup> - Pay your business bills quickly and easily online. Simplify your accounts payable. Vendors receive a bank deposit or check in the mail. Five BillPay transactions allowed per month.

**POWER BUSINESS BUNDLE - \$8.95 Per Month**

- ACH<sup>5</sup> - Fast, secure automated clearing house (ACH) payment solutions so you can more easily manage payroll, vendor payments, and more.
- Wire<sup>5</sup> - Move money fast so you can get back to business. Our wire transfer services help you quickly move funds across the country or around the world.
- Unlimited BillPay - Same as the Saver Business Bundle, but Unlimited!
- Unlimited Mobile Deposit - Same as the Saver Business Bundle.

**BUSINESS CLUB - \$10.95 Per Month**

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

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See a bank representative for our Business Fee Schedule.

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

## Business Savings

### Regular Savings

Regular Savings is an interest bearing account.

*Minimum Deposit to Open: \$10*

*Withdrawals Allowed: 6 per month*

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

Comments:

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

[\*\*Get Started\*\*](#)

## Business Cash Management

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

### **Linked Accounts**

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

### **Business Online Banking**

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

### **Bill Payment**

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

### **Mobile Banking**

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

### **Mobile Deposit**

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

### **ACH Origination Services**

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

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

### **Wire Transfer Services**

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

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

### **Remote Deposit Capture**

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

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

### **Positive Pay**

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

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

### **ACH Debit Block/Filters**

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

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

### **Account Reconciliation**

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

Processing fees apply.

### **Sweep Account**

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

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

### **SmartPay Express**

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

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

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Download our Cash Management [brochure](#).

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

## Business Debit Cards

### No More Waiting With Card@Once

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

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

### Which Card Is Right For You?

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

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

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

### Business Debit

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

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



### Real Time Debit/ATM Processing

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

How does Real Time processing benefit you?

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

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

### Benefits for Debit MasterCard® (enhanced)

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

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

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



## Business Credit Cards

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

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

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

### [APPLY NOW](#)

#### Credit Card Member Services

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

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

## Business Overdraft Privilege

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

### **What You Need to Know About Overdrafts and Overdraft Fees**

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

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

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

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

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

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

- ATM transactions
- Everyday debit card transactions

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

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

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

Under our standard overdraft practices:

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

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

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

[Opt In Now](#)

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

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

**Deminimus Amount:**

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

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

**[Overdraft Privilege Disclosure](#)**

## Business Services

### ATMs

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

Visit [www.moneypass.com](http://www.moneypass.com) to find out more.

### Business Debit Card

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

### Cash Management

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

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

### Cashier Checks

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

### Image Statements

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

### Intuit QuickBooks & Quicken

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

### Linked Accounts

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

### Merchant Capture

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

### Merchant Card Services

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

### Mobile App

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

### Mobile Check Deposit

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

### Night Depository

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

### Overdraft Privilege

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

### Notary Service

This service is available at no charge to our customers.

### Safe Deposit Box

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

### Sweep Services

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

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

#### Telephone Banking

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

#### Wire Transfers

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

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

## Business Real Time Processing

### Real-Time Debit Card Transaction Processing

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

### How it Works

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

### Debit Card Authorization Vs. Posted Transaction

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

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

### Checks & Deposits

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

### Enhanced Security

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

### Contact Us

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



## Commercial & Business Loans

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

Comments:

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

[Get Started](#)

## Mortgages

Adjustable Rate Mortgage

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

Comments:

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

[Get Started](#)

Conventional Fixed Rate Mortgage

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

Comments:

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

## [Get Started](#)

### Freedom Line of Credit

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

#### Comments:

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

## [Get Started](#)

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

## Construction

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

#### Comments:

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

## [Get Started](#)

## Agriculture

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

#### Comments:

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

## [Get Started](#)

## SCHEDULE OF FEES



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

# **PUBLIC DISCLOSURE**

June 22, 2021

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Citizens Bank of Lafayette  
Certificate Number: 1711

400 Highway 52 Bypass West  
Lafayette, Tennessee 37083

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Region - Memphis Area Office

6060 Primacy Parkway, Suite 300  
Memphis, Tennessee 38119

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

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## INSTITUTION RATING

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

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

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

**The Lending Test is rated High Satisfactory.**

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

**The Investment Test is rated High Satisfactory.**

- The bank has an excellent level of qualified CD investments and grants.
- The bank exhibits adequate responsiveness to credit and CD needs.
- The bank occasionally uses innovative and complex investments to support CD initiatives.

**The Service Test is rated Low Satisfactory.**

- Delivery systems are accessible to essentially all portions of the AAs.
- No opening or closing of branches have been made since the previous evaluation; therefore, this area did not affect overall conclusions.
- Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and individuals.
- The bank provides an adequate level of CD services.

## **DESCRIPTION OF INSTITUTION**

Citizens Bank of Lafayette (CBL), established in 1934, maintains its headquarters in Lafayette, Tennessee. Citizens Bancorp Investment, Inc., a two-bank holding company, also headquartered in Lafayette, Tennessee wholly owns the bank as well as American Bank & Trust of the Cumberland, Livingston, Tennessee. In addition, the holding company wholly owns other non-bank affiliates and subsidiaries; however, examiners did not consider lending or CD activities from these affiliates and subsidiaries in this evaluation. CBL received a Satisfactory rating at its prior May 30, 2018, FDIC Performance Evaluation based on Federal Financial Institutions Examination Council (FFIEC) Large Institution CRA Examination Procedures.

CBL functions as a retail bank operating 19 full-service offices in two AAs located in middle Tennessee. The bank has not opened or closed any branches and had no merger or acquisition activity since the previous evaluation.

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

As of the March 31, 2021, Consolidated Reports of Condition and Income, the bank reported total assets of \$1.1 billion, total loans of \$610.4 million, and total deposits of \$914.8 million.

As seen in the following table, the mix of outstanding loans as of March 31, 2021, shows that commercial loans and home mortgage loans represent the two largest loan categories.

<b>Loan Portfolio Distribution as of 3/31/2021</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	63,724	10.4
Secured by Farmland	50,989	8.4
Secured by 1-4 Family Residential Properties	192,533	31.5
Secured by Multifamily (5 or more) Residential Properties	22,165	3.6
Secured by Nonfarm Nonresidential Properties	158,276	25.9
<b>Total Real Estate Loans</b>	<b>487,687</b>	<b>79.9</b>
Commercial and Industrial Loans	62,773	10.3
Agricultural Production and Other Loans to Farmers	8,135	1.3
Consumer Loans	38,894	6.4
Obligations of State and Political Subdivisions in the U.S.	10,298	1.7
Other Loans	2,688	0.4
Lease Financing Receivable (net of unearned income)	-	0.0
Less: Unearned Income	104	0.0
<b>Total Loans</b>	<b>610,371</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		
<i>Due to rounding, totals may not equal 100.0 percent</i>		

Based on the information discussed in this section, as well as other regulatory data, the institution's financial condition, size, product offerings, prior performance, and status of any legal impediments did not affect its ability to meet AA credit needs.

## **DESCRIPTION OF ASSESSMENT AREAS**

The CRA requires each financial institution to define one or more AAs within which its CRA performance will be evaluated. CBL designated two AAs consisting of 10 counties in Tennessee.

The AAs meet the technical requirements of the CRA. The following table provides additional details regarding the composition of each AA. Refer to the individual AA sections of this evaluation for additional information on each AA.



Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of Census Tracts	# of Branches
Nashville MSA	Macon, Smith, Sumner, and Wilson	21	9
Tennessee Non-MSA	Bedford, Clay, Coffee, DeKalb, Franklin, and Jackson	40	10

*Source: Bank data and 2015 American Community Survey (ACS) data*

## SCOPE OF EVALUATION

### General Information

Examiners used the Interagency Large Institution CRA Examination Procedures to evaluate CBL’s performance since the previous evaluation dated May 30, 2018, to the current evaluation dated June 22, 2021. The procedures consist of the Lending, Investment, and Service Tests. The Appendix lists the details of each test.

Examiners used full-scope procedures to assess CBL’s performance in its Tennessee Non-Metropolitan Statistical Area (MSA) AA as this area maintained a high level of lending, deposits, and branches. Examiners also used full-scope procedures to assess the performance in the Nashville MSA AA since this AA has changed since the previous evaluation.

The following table shows the distribution of the loan categories reviewed by AA based on the dollar volume of loans originated inside the AAs. Examiners weighed each area consistent with that area’s overall lending level. As such, examiners afforded relatively equal weight to both AAs.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Nashville MSA	103,348	49.9	379,962	45.6	9	47.4
Tennessee Non-MSA	103,556	50.1	453,666	54.4	10	52.6
<b>Total</b>	<b>206,904</b>	<b>100.0</b>	<b>833,628</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>

*Source: Home Mortgage Disclosure (HMDA) and CRA data (2018 – 2020), FDIC Summary of Deposits (6/30/2020), and Bank data*

### Activities Reviewed

For the Lending Test, CRA Large Institution procedures require examiners to consider a bank’s reported small business, home mortgage, and small farm loans, as well as all reported CD loans originated since the previous evaluation. Consequently, this evaluation considers total loans reported either according to the HMDA or CRA data collection reporting requirements for completed calendar years since the prior evaluation:

#### Small Business Loans

- 2018 – 501 loans totaling \$45,050,000

- 2019 – 421 loans totaling \$37,078,000
- 2020 – 1,074 loans totaling \$72,109,000

Home Mortgage Loans

- 2018 – 247 loans totaling \$27,141,000
- 2019 – 221 loans totaling \$26,055,000
- 2020 – 237 loans totaling \$33,674,000

Small Farm Loans

- 2018 – 347 loans totaling \$17,774,000
- 2019 – 244 loans totaling \$15,068,000
- 2020 – 208 loans totaling \$13,566,000

Community Development Loans

May 30, 2018 – June 22, 2021: 22 loans totaling \$21,326,000

Since no trends exist between the different years’ data that materially affect applicable conclusions or ratings, this evaluation only presents small business, home mortgage, and small farm data for 2019, the most recent calendar year for which corresponding aggregate data exists. However, examiners include all years of each loan category reviewed in the AA Concentration discussion. Examiners compared the home mortgage lending to 2019 HMDA aggregate data and the small business and small farm lending to 2019 CRA aggregate data. This evaluation also presents demographic data based on the 2015 ACS data and 2018 D&B data.

Examiners considered the universes of loans reviewed by number and dollar volume, as well as management’s stated business strategy, to determine the weighting applied to the loan categories reviewed. As seen in the following table, small business loans represent a majority of the loan categories reviewed. Therefore, small business loans received more weight in both AAs when arriving at overall conclusions.

<b>Loan Products Reviewed</b>				
<b>Loan Category</b>	<b>Universe</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Small Business	421	47.5	37,078	48.3
Home Mortgage	221	25.0	26,055	34.0
Small Farm	244	27.5	13,566	17.7
<b>Total Loans</b>	<b>886</b>	<b>100.0</b>	<b>76,699</b>	<b>100.0</b>
<i>Source: 2019 Bank data</i>				

The CRA evaluation also reviewed the CD investments and services for the period since the previous CRA evaluation. Qualified investments (QIs) included new investments and grants, as well as outstanding QIs from the prior evaluation.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

CBL demonstrated a high satisfactory record regarding the Lending Test. The good geographic distribution, CD lending, and AA concentration outweighed the excellent record for borrower profile and lending activity and the adequate records for responsiveness and product innovation to support this conclusion. This performance remains consistent with the good Lending Test levels in both AAs.

For the CRA Large Institution Lending Test, typically, examiners will first determine whether the presence of any weaker lending activity or AA concentration performance warrants downgrading the overall Lending Test rating. Absent any such warranted downgrading, examiners will then place more weight on the borrower profile, geographic loan distribution, as well as CD loan performances when arriving at the overall Lending Test rating. The following sections contain conclusions for each of the Lending Test performance criteria for the bank overall. Separate analyses for each AA are contained later in this evaluation.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Excellent records regarding small business, home mortgage, and small farm lending support this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to AA credit needs when arriving at this conclusion. Each AA includes a more detailed discussion of the lending activity.

#### Assessment Area Concentration

A high percentage of loans are made inside the institution's AAs. The following table shows that the bank originated a majority of its small business, home mortgage, and small farm loans by number and dollar volume, within the AAs.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2018	388	77.4	113	22.6	501	30,511	67.7	14,539	32.3	45,050
2019	335	79.6	86	20.4	421	26,815	72.3	10,263	27.7	37,078
2020	817	76.1	257	23.9	1,074	51,453	71.4	20,656	28.6	72,109
<b>Subtotal</b>	<b>1,540</b>	<b>77.2</b>	<b>456</b>	<b>22.8</b>	<b>1,996</b>	<b>108,779</b>	<b>70.5</b>	<b>45,458</b>	<b>29.5</b>	<b>154,237</b>
Home Mortgage										
2018	188	76.1	59	23.9	247	19,703	72.6	7,438	27.4	27,141
2019	167	75.6	54	24.4	221	18,963	72.8	7,091	27.2	26,055
2020	182	76.8	55	23.2	237	23,789	70.6	9,885	29.4	33,674
<b>Subtotal</b>	<b>537</b>	<b>76.2</b>	<b>168</b>	<b>23.8</b>	<b>705</b>	<b>62,455</b>	<b>71.9</b>	<b>24,414</b>	<b>28.1</b>	<b>86,870</b>
Small Farm										
2018	294	84.7	53	15.3	347	14,999	84.4	2,775	15.6	17,774
2019	194	79.5	50	20.5	244	11,544	76.6	3,524	23.4	15,068
2020	170	81.7	38	18.3	208	9,126	67.3	4,440	32.7	13,566
<b>Subtotal</b>	<b>658</b>	<b>82.4</b>	<b>141</b>	<b>17.6</b>	<b>799</b>	<b>35,669</b>	<b>76.9</b>	<b>10,739</b>	<b>23.1</b>	<b>46,408</b>
<b>Total</b>	<b>2,735</b>	<b>78.1</b>	<b>765</b>	<b>21.9</b>	<b>3,500</b>	<b>206,903</b>	<b>72.0</b>	<b>80,611</b>	<b>28.0</b>	<b>287,515</b>

Source: HMDA and CRA data (2018 – 2020)

### **Geographic Distribution**

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

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among business and farm customers of different sizes and retail customers of different income levels. Excellent records in the Nashville MSA AA and Tennessee Non-MSA AA support this conclusion. Examiners focused on the percentage by number of loans to businesses and farms with gross annual revenues (GARs) of \$1 million or less and to LMI individuals when arriving at conclusions for this performance factor. This factor only considered loans originated inside the AAs.

***Small Business Administration (SBA) Paycheck Protection Program (PPP) Loans***

The bank’s willingness to meet the credit needs of businesses of varying sizes, including small businesses, through originating PPP loans further supports the bank’s borrower profile performance. The Coronavirus Aid Relief and Economic Security Act, signed into law on March 27, 2020, established the temporary PPP. The SBA, with support from the Department of the Treasury, implements the PPP, which provides loans to encourage qualified businesses that meet certain standards established by the SBA, to retain employees through the COVID-19 Pandemic and includes loan forgiveness subject to certain conditions. The FDIC encourages financial institutions to consider using this program in a prudent manner as they actively work with business borrowers, including small businesses with less financial flexibility to withstand near term operational challenges due to the COVID-19 Pandemic.

The bank originated 2,094 PPP loans totaling \$57.0 million, considered small business loans with loan amounts of \$1 million or less, which is significant. This lending activity demonstrates the bank’s willingness to meet the credit needs of businesses of varying sizes, including small businesses, in response to the COVID-19 Pandemic.

**Innovative or Flexible Lending Practices**

The institution makes limited use of innovative and flexible lending practices in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices support this conclusion. Examiners analyzed performance for this criterion at the institution level only, as the bank offers all of its innovative or flexible lending programs throughout all AAs.

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

<b>Innovative or Flexible Lending Programs</b>										
<b>Type of Program</b>	<b>2018*</b>		<b>2019</b>		<b>2020</b>		<b>2021 YTD**</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Small Dollar Loans	1,790	2,083	2,504	2,942	1,909	2,294	172	226	<b>6,375</b>	<b>7,545</b>
<i>Source: Bank data</i> <i>*Lending activity since May 30, 2018</i> <i>**Year-to-date (YTD)</i>										

Since the prior evaluation, the bank originated 6,375 small dollar loans totaling \$7.5 million. This dollar figure equates to 0.8 percent of average total assets of \$961.4 million since the previous evaluation, thereby reflecting adequate performance. This level slightly increased over the 0.4 percent of average total assets reported in the previous evaluation.

**Community Development Loans**

CBL has made a relatively high level of CD loans. The good level of CD loans and its adequate responsiveness to CD needs support this conclusion. This performance was inconsistent with both AAs where performance fell below that of the institution.

During the evaluation period, CBL originated 22 CD loans totaling \$21.3 million. This level of activity represents 2.2 percent of average total assets and 3.6 percent of average net loans at \$599.3 million since the previous evaluation. This activity reflects a decline in both number and dollar volume from the previous evaluation when the bank originated 34 loans totaling \$29.5 million, which represented 3.4 percent of average total assets and 6.0 percent of average net loans. The following tables show the CD lending by AA, purpose, and year.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nashville MSA	3	396	0	0	6	8,075	2	520	11	8,991
Tennessee Non-MSA	0	0	0	0	1	700	0	0	1	700
Statewide/Regional	0	0	0	0	2	1,550	8	10,085	10	11,635
<b>Total</b>	<b>3</b>	<b>396</b>	<b>0</b>	<b>0</b>	<b>9</b>	<b>10,325</b>	<b>10</b>	<b>10,605</b>	<b>22</b>	<b>21,326</b>
<i>Source: Bank data</i>										

Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2018*	2	266	0	0	0	0	2	520	4	786
2019	1	130	0	0	3	3,750	5	2,056	9	5,936
2020	0	0	0	0	6	6,575	3	8,029	9	14,604
2021 YTD	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>396</b>	<b>0</b>	<b>0</b>	<b>9</b>	<b>10,325</b>	<b>10</b>	<b>10,605</b>	<b>22</b>	<b>21,326</b>
<i>Source: Bank data</i>										
<i>*Activity since May 30, 2018</i>										

The institution exhibits an adequate record of serving the credit needs of the most economically disadvantaged areas of its AAs, , small businesses, LMI individuals and small farms. The CD loans proved responsive to AA needs given that they addressed affordable housing, economic development, and revitalization or stabilization efforts throughout the AAs. As seen in the prior table, 49.7 percent by dollar volume address revitalization or stabilization efforts.

CD lending activities were considered at a statewide or regional level since the needs of the AAs were met. CBL made 10 CD loans totaling approximately \$11.6 million benefitting the statewide or regional area.

The following lists a notable example of the CD lending activities occurring at the statewide or regional level:

- **Revitalize or Stabilize** – The bank granted a loan totaling \$5.0 million dollars to purchase commercial real estate in a moderate-income area. This loan supports efforts to create and retain jobs in LMI census tracts.

**INVESTMENT TEST**

CBL demonstrated a high satisfactory record under the Investment Test. An excellent level of QIs and grants, adequate responsiveness to credit and CD needs, and occasional use of innovative and complex investments, support the rating. This performance was inconsistent with both AAs where performances fell below that of the institution. The inconsistent performance is due to a majority of the QIs benefitting the statewide or regional level.

**Investment and Grant Activity**

The institution has an excellent level of qualified CD, investment, and grants, often in a leadership position, particularly those that are not routinely provided by private investors. As seen in the following table, the bank made use of 42 QIs totaling approximately \$22.3 million. This represents 2.3 percent of average total assets and 8.8 percent of average total securities of \$253.2 million since the previous evaluation. These levels reflect a decrease from the 4.2 percent of average total assets and 12.1 percent of average securities reported in the previous evaluation. The following tables summarize the QIs, donations, and grants by AA, purpose, and year.

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Nashville MSA	1	1,738	0	0	0	0	0	0	1	1,738
Tennessee Non-MSA	0	0	0	0	0	0	0	0	0	0
Statewide/Regional	18	5,398	3	1,580	20	13,627	0	0	41	20,605
<b>Total</b>	<b>19</b>	<b>7,136</b>	<b>3</b>	<b>1,580</b>	<b>20</b>	<b>13,627</b>	<b>0</b>	<b>0</b>	<b>42</b>	<b>22,343</b>

Source: Bank data

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	17	4,246	0	0	18	9,834	0	0	35	14,080
2018*	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0
2020	1	2,845	3	1,580	2	3,793	0	0	6	8,218
2021 YTD	1	45	0	0	0	0	0	0	1	45
<b>Subtotal</b>	<b>19</b>	<b>7,136</b>	<b>3</b>	<b>1,580</b>	<b>20</b>	<b>13,627</b>	<b>0</b>	<b>0</b>	<b>42</b>	<b>22,343</b>
Qualified Grants & Donations	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>19</b>	<b>7,136</b>	<b>3</b>	<b>1,580</b>	<b>20</b>	<b>13,627</b>	<b>0</b>	<b>0</b>	<b>42</b>	<b>22,343</b>
Source: Bank data										
*Activity since May 30, 2018										

QI activities occurred in the statewide or regional level that includes the institution's designated AAs during the evaluation period. CBL made 41 QIs totaling approximately \$20.6 million benefitting the statewide or regional area.

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

- **Affordable Housing** – The bank holds 16 Tennessee Housing Development Agency (THDA) bonds that remain outstanding from the prior period; these bonds have a current book value of \$2.5 million. THDA is a state agency that provides financing for affordable housing to LMI families statewide.
- **Economic Development** – The bank holds 20 bonds funding SBA's Small Business Investment Company (SBIC) Program and the 504 Loan Program. These programs promote economic development by supporting small business financial needs.

### **Responsiveness to Credit and Community Development Needs**

CBL exhibits adequate responsiveness to credit and CD needs. QIs funded economic development, affordable housing, and community services and these all reflect identified CD needs.

### **Community Development Initiatives**

CBL occasionally uses innovative and/or complex investments to support CD initiatives. Although the investments are responsive to AA community needs, many are not particularly innovative or complex. The bank continues to invest in affordable housing initiatives through the THDA, and economic development initiatives through SBIC.



**SERVICE TEST**

CBL demonstrated a low satisfactory record regarding the Service Test. The reasonableness of business hours and services offered and adequate CD services outweighed the accessibility of delivery systems to support this conclusion. This performance proved consistent in both AAs.

**Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution’s AAs. The following table illustrates the distribution of branches and ATMs by geography income level. The table shows that in low-income geographies, the percentage of branches and ATMs exceeds the percentage of the AA populations residing in those areas, thereby reflecting adequate performance. The table further shows that in moderate-income geographies, the percentage of branches and ATMs significantly exceeds the percentage of the AA’s population residing in those areas, thereby reflecting excellent performance.

<b>Branch and ATM Distribution by Geography Income Level</b>								
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	1	1.6	3,120	1.2	1	5.3	1	5.3
Moderate	16	26.2	70,310	25.5	8	42.1	8	42.1
Middle	36	59.0	169,209	61.4	8	42.1	9	47.4
Upper	7	11.5	32,835	11.9	2	10.5	1	5.3
NA	1	1.6	0	0.0	0	0.0	0	0.0
<b>Total</b>	<b>61</b>	<b>100.0</b>	<b>275,474</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>
<i>Source: 2015 ACS data and Bank data Due to rounding, totals may not equal 100.0 percent</i>								

The institution makes its alternative delivery systems reasonably accessible to all portions of the AAs. In addition to its ATMs, alternative delivery systems include online banking, remote deposit capture, and mobile banking services. Services offered remain consistent throughout all AAs.

**Changes in Branch Locations**

CBL has not made any changes to branch locations since the previous evaluation

**Reasonableness of Business Hours and Services**

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies or individuals. Service hours and loan and deposit product offerings are substantially similar throughout the AAs.

CBL maintains hours and services typical for the areas served and the industry. Most locations maintain lobby hours that cover at least eight hours a day, Monday through Thursday. CBL offers

extended hours on Friday.

The bank offers a range of deposit products to consumer and commercial customers to include checking, savings, money market, certificates of deposit, and individual retirement accounts. Credit-related products offered for consumer and commercial entities include non-residential loans, an overdraft line-of-credit product, home mortgage loans, home equity loans and lines of credit, and various commercial-purpose loan products. CBL also makes credit card products available to customers.

### **Community Development Services**

CBL provides an adequate level of CD services. The directors, officers, and employees provided 56 CD services since the previous evaluation. The CD services focused largely on community services and economic development. The level of CD services reflects a slight increase from the prior evaluation, when the bank provided 55 CD services. The following tables shows the number of CD services by AA, purpose, and year.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	#	#	#	#	#
Nashville MSA	0	31	8	2	<b>41</b>
Tennessee Non-MSA	0	5	0	3	<b>8</b>
Statewide/Regional	0	0	7	0	<b>7</b>
<b>Total</b>	<b>0</b>	<b>36</b>	<b>15</b>	<b>5</b>	<b>56</b>

*Source: Bank data*

<b>Community Development Services by Year</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	#	#	#	#	#
2018*	0	5	3	0	<b>8</b>
2019	0	10	4	1	<b>15</b>
2020	0	11	4	2	<b>17</b>
2021 YTD	0	10	4	2	<b>16</b>
<b>Total</b>	<b>0</b>	<b>36</b>	<b>15</b>	<b>5</b>	<b>56</b>

*Source: Bank data*  
*\*Activity since May 30, 2018*

The following lists a notable example of the CD services occurring at the statewide or regional area:

- ***Economic Development*** – An executive officer serves on the Board of an economic development organization. This organization encourages economic development by helping small-businesses obtain financing.

## DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

### NASHVILLE MSA AA – FULL-SCOPE REVIEW

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NASHVILLE MSA AA

This AA includes the following contiguous counties: Macon, Smith, Sumner, and Wilson. The following table shows that CBL operates nine branch offices throughout this middle-Tennessee AA. The bank also operates 10 ATMs in this AA.

Office Locations Nashville MSA AA				
County/City/Office	Office Type	Census Tract Number	Census Tract Income Level	Office Opened or Closed Since Last Evaluation
<b>Macon County:</b>				
Lafayette – 400 Hwy 52 Bypass West	Main Office	9703.00	Moderate	No
Public Square – 201 West Locust Street	Branch	9703.00	Moderate	No
Red Boling Springs – 32 Carthage Road	Branch	9701.00	Moderate	No
Scottsville – 1108 Scottsville Road	Branch	9703.00	Moderate	No
<b>Smith County:</b>				
Gordonsville – 411 Gordonsville Hwy	Branch	9754.00	Middle	No
Smith – 50 Main Street North	Branch	9751.00	Moderate	No
<b>Sumner County:</b>				
Westmoreland – 990 New Hwy 52	Branch	0201.01	Moderate	No
<b>Wilson County:</b>				
North Cumberland – 214 N. Cumberland	Branch	0307.00	Low	No
West Main – 1035 West Main Street	Branch	0306.00	Moderate	No
<i>Source: Bank data and 2015 ACS data</i>				

#### Economic and Demographic Data

Based on 2015 ACS data, the AA's 21 census tracts include the following income designations: one low-, 12 moderate-, and eight middle-income. The following table provides select demographic characteristics for this AA.

Demographic Information of the Assessment Area						
Assessment Area: Nashville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.8	57.1	38.1	0.0	0.0
Population by Geography	96,588	3.2	52.7	44.1	0.0	0.0
Housing Units by Geography	41,149	3.2	55.1	41.7	0.0	0.0
Owner-Occupied Units by Geography	25,431	1.7	48.5	49.8	0.0	0.0
Occupied Rental Units by Geography	10,785	5.5	68.4	26.1	0.0	0.0
Vacant Units by Geography	4,933	5.6	60.3	34.1	0.0	0.0
Businesses by Geography	5,954	8.4	55.7	35.9	0.0	0.0
Farms by Geography	352	1.4	43.5	55.1	0.0	0.0
Family Distribution by Income Level	25,004	30.4	22.5	20.8	26.3	0.0
Household Distribution by Income Level	36,216	32.2	20.5	18.3	29.0	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreeseboro-- Franklin, TN MSA		\$66,441	Median Housing Value			\$124,871
			Median Gross Rent			\$685
			Families Below Poverty Level			13.6%
<i>Source: 2015 ACS data and 2019 D&amp;B data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification</i>						

On April 17, 2019, the Federal Emergency Management Agency (FEMA) made a disaster declaration affecting Smith County due to severe storms. On March 5, 2020, FEMA made a disaster declaration affecting Smith and Wilson Counties due to tornadoes. On April 2, 2020, FEMA made a disaster declaration affecting all counties in the AA due to the COVID-19 Pandemic. On April 21, 2021, FEMA made a disaster declaration affecting Smith County due to severe ice storms. On May 8, 2021, FEMA made a disaster declaration affecting Smith and Wilson Counties due to tornadoes.

Currently, major employers in the Nashville MSA AA include: Vanderbilt University Medical Center, Nissan North America, Inc., HCA Healthcare, Inc., and Vanderbilt University.<sup>1</sup> The following table lists annual unemployment rates over the evaluation period for the AA, State of Tennessee, and nationwide.

<sup>1</sup>Source: Moody's Analytics, Precis U.S. Metro, April 2020

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Macon County	3.1	3.2	6.1
Smith County	3.0	2.9	5.0
Sumner County	2.7	2.6	5.2
Wilson County	2.8	2.6	5.0
State of Tennessee	3.4	3.6	5.6
National Average	3.9	3.6	6.7

*Source: Bureau of Labor Statistics*

Examiners use the applicable FFIEC-updated median family income levels to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle-, and upper-income ranges based on the 2019 FFIEC-updated median family income of \$73,100 for the Nashville MSA.

<b>Median Family Income Ranges – Nashville MSA</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2019 (\$73,100)	<\$36,550	\$36,550 to <\$58,480	\$58,480 to <\$87,720	≥\$87,720

*Source: FFIEC*

### **Competition**

The AA includes a high level of competition for financial services. According to the FDIC Deposit Market Share report as of June 30, 2020, 29 financial institutions operated 115 offices within the AA. Of these institutions, CBL ranked seventh with a 4.3 percent deposit market share.

### **Credit and Community Development Needs and Opportunities**

Considering information obtained from bank management, as well as demographic and economic data, examiners concluded that the primary credit needs of the AA include small business and home mortgage loans. Furthermore, as indicated by the demographic and economic data, the AA CD needs include affordable housing, community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area due to the disaster designations.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NASHVILLE MSA AA**

### **LENDING TEST**

CBL demonstrated a good record under the Lending Test in the Nashville MSA AA. Excellent lending levels and borrower profile and good geographic distribution performance lifted adequate CD lending to support this conclusion.

#### **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. Excellent performance regarding home mortgage loans and small farm loans uplifted the good performance regarding small business loans to support this conclusion.

#### ***Small Business Loans***

Small business lending levels reflect good responsiveness to AA credit needs in the Nashville MSA AA. A moderate level of competition exists within the AA for small business loans. For 2019, the bank originated 174 total reportable small business loans totaling approximately \$13.1 million. CBL captured 2.9 percent of the market share by number.

The bank's activity ranks ninth out of 82 total lenders that reported 6,591 small business loan originations and purchases. This ranking lands the bank in the top 11.0 percent of lenders reporting such loans in the Nashville MSA AA.

#### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. A high level of competition exists for home mortgage loans among the area's banks, credit unions, and non-depository mortgage lenders. For 2019, the bank originated 97 total reportable home mortgage loans totaling approximately \$8.2 million. CBL captured 2.2 percent of the market share by number.

The bank's activity ranks 10th out of 265 total lenders that reported 4,335 home mortgage loan originations and purchases. This ranking lands the bank in the top 3.8 percent of lenders reporting such loans in the Nashville MSA AA.

#### ***Small Farm Loans***

Small farm lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. A moderate level of competition exists within the AA for small farm loans. For 2019, the bank originated 122 total reportable small farm loans totaling approximately \$8.3 million. CBL captured 51.1 percent of the market share by number.

The bank’s activity ranks first out of 20 total lenders that reported 239 small farm loan originations and purchases. This ranking lands the bank in the top 5.0 percent of lenders reporting such loans in the Nashville MSA AA.

**Geographic Distribution**

The geographic distribution of loans reflects good penetration throughout the AA. Good performances regarding small business and small farm lending outweighed excellent performance regarding home mortgage lending to support this conclusion. Examiners focused on the percentages by the number of loans in LMI census tracts when arriving at conclusions.

***Small Business Loans***

The geographic distribution of small business loans reflects good penetration throughout the AA. Good performance in moderate-income census tracts and adequate performance in low-income census tracts supports this conclusion.

The following table shows that the level of lending in low-income census tracts falls below aggregate data by 5.8 percentage points, reflecting adequate performance. The table further shows that the level of lending in moderate-income census tracts exceeds aggregate data by 9.2 percentage points, reflecting good performance. Examiners placed more weight on performance in moderate-income census tracts since aggregate data is higher in these areas, reflecting more loan demand.

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: Nashville MSA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	8.4	8.1	4	2.3	964	7.3
Moderate	55.7	51.1	105	60.3	8,842	67.3
Middle	35.9	40.8	65	37.4	3,343	25.4
Upper	0.0	0.0	0	0.0	0	0.0
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>	<b>13,149</b>	<b>100.0</b>
<i>Source: 2019 D&amp;B data, 2019 CRA Aggregate data, and 2019 CRA data Due to rounding, totals may not equal 100.0 percent</i>						

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects excellent penetration throughout the AA. Excellent performance in moderate-income geographies outweighs adequate performance in low-income geographies to support this conclusion.

Although the bank did not make any home mortgage loans in low-income census tracts, the performance only trailed aggregate data by 2.3 percentage points, reflecting adequate performance. The table further shows that the lending performance in moderate-income census tracts exceeds aggregate data by 18.6 percentage points, reflecting excellent performance.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Assessment Area: Nashville MSA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	1.7	2.3	0	0.0	0	0.0
Moderate	48.5	50.5	67	69.1	5,712	69.3
Middle	49.8	47.2	30	30.9	2,528	30.7
Upper	0.0	0.0	0	0.0	0	0.0
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>97</b>	<b>100.0</b>	<b>8,240</b>	<b>100.0</b>

*Source: 2015 ACS data, 2019 HMDA Aggregate data, and 2019 HMDA data  
Due to rounding, totals may not equal 100.0 percent*

### ***Small Farm Loans***

The geographic distribution of small farm loans reflects good penetration throughout the AA. The good performance in moderate-income census tracts outweighed the adequate performance in low-income census tracts support this conclusion.

The following table shows that the bank did not originate any small farm loans in low-income census tracts; however, this only trails aggregate data by 0.5 percentage points, reflecting adequate performance. The table further shows that the level of lending in moderate-income census tracts exceeds aggregate data by 11.5 percentage points, reflecting good performance. Examiners placed more weight on performance in moderate-income census tracts since aggregate data is higher in these areas, reflecting more loan demand.



<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: Nashville MSA</b>						
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	1.4	0.5	0	0.0	0	0.0
Moderate	43.5	53.3	79	64.8	4,141	50.0
Middle	55.1	46.2	43	35.2	4,136	50.0
Upper	0.0	0.0	0	0.0	0	0.0
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>122</b>	<b>100.0</b>	<b>8,277</b>	<b>100.0</b>

*Source: 2019 D&B data, 2019 CRA Aggregate data, and 2019 CRA data  
Due to rounding, totals may not equal 100.0 percent*

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among businesses and farms of different sizes and retail customers of different income levels in the AA. Excellent small business and small farm lending performances outweigh the good home mortgage lending performance to support this conclusion.

### ***Small Business Loans***

The distribution of borrowers reflects excellent penetration among businesses of different sizes. An excellent record of lending to businesses with GARs of \$1 million or less primarily supports this conclusion.

As shown in the following table, the level of lending to small businesses with GARs of \$1 million or less rises significantly higher than aggregate performance and also exceeds business demographic data, reflecting excellent performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Nashville MSA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	82.7	53.2	174	100.0	13,149	100.0
>1,000,000	4.4	--	0	0.0	0	0.0
Revenue Not Available	12.9	--	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>	<b>13,149</b>	<b>100.0</b>

*Source: 2019 D&B data, 2019 CRA Aggregate data, and 2019 CRA data  
Due to rounding, totals may not equal 100.0 percent*

### ***Home Mortgage Loans***

The distribution of borrowers reflects good penetration among retail customers of different income levels. An excellent record of lending to low-income borrowers and an adequate record of lending to moderate-income borrowers supports this conclusion.

As shown in the following table, the level of lending to low-income borrowers significantly exceeds aggregate data by 18.7 percentage points, reflecting excellent performance. The table further shows that the level of lending to moderate-income borrowers exceeds aggregate data by 3.2 percentage points, reflecting adequate performance.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Assessment Area: Nashville MSA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	30.4	10.2	28	28.9	1,372	16.7
Moderate	22.5	21.5	24	24.7	1,734	21.0
Middle	20.8	24.0	18	18.6	1,456	17.7
Upper	26.3	24.7	24	24.7	2,586	31.4
Not Available	0.0	19.5	3	3.1	1,091	13.2
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>97</b>	<b>100.0</b>	<b>8,240</b>	<b>100.0</b>
<i>Source: 2015 ACS data, 2019 HMDA Aggregate data, and 2019 HMDA data Due to rounding, totals may not equal 100.0 percent</i>						

### ***Small Farm Loans***

The distribution of borrowers reflects excellent penetration among farms of different sizes. An excellent record of lending to farms with GARs of \$1 million or less primarily supports this conclusion.

As shown in the following table, the level of lending to farms with GARs of \$1 million or less rises significantly higher than aggregate performance by 23.1 percentage points, reflecting excellent performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category						
Assessment Area: Nashville MSA						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	98.3	76.9	122	100.0	8,277	100.0
>1,000,000	1.1	--	0	0.0	0	0.0
Revenue Not Available	0.6	--	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>122</b>	<b>100.0</b>	<b>8,277</b>	<b>100.0</b>
<i>Source: 2019 D&amp;B data, 2019 CRA Aggregate data, and 2019 CRA data</i>						
<i>Due to rounding, totals may not equal 100.0 percent</i>						

### Community Development Loans

CBL has made an adequate level of CD loans in the Nashville MSA AA. Specifically, the bank granted 11 CD loans totaling \$9.0 million during the evaluation period. The level of CD lending declined since the previous evaluation where the bank granted 26 loans totaling \$24.1 million. A majority of the CD loans, by number and dollar volume, supported economic development efforts in the area, which demonstrates the bank’s responsiveness to an identified CD need. The following table displays CD lending by year and purpose.

Community Development Lending										
Assessment Area: Nashville MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2018*	2	266	0	0	0	0	2	520	4	786
2019	1	130	0	0	3	3,750	0	0	4	3,880
2020	0	0	0	0	3	4,325	0	0	3	4,325
YTD 2021	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>3</b>	<b>396</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>8,075</b>	<b>2</b>	<b>520</b>	<b>11</b>	<b>8,991</b>
<i>Source: Bank data</i>										
<i>*Activity since May 30, 2018</i>										

The following lists an example of the CD loans within the Nashville MSA AA:

- **Economic Development** – The bank originated five loans totaling approximately \$6.8 million to finance farm operations in Macon County. The activities helped to create and retain jobs for LMI individuals in the area.

### **INVESTMENT TEST**

CBL demonstrated a poor record under the Investment Test within the Nashville MSA AA. The poor level of QIs and poor responsiveness to CD needs outweighed the absence of innovative or complex QIs to support this conclusion.

**Investment and Grant Activity**

CBL has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The institution made one investment totaling approximately \$1.7 million that benefitted LMI individuals within the AA. However, this performance is consistent with the institution’s level of QIs made at the prior evaluation, in this AA. The following table details QIs within the AA by year and purpose.

Qualified Investments Assessment Area: Nashville MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	1	1,738	0	0	0	0	0	0	1	1,738
2018 (Partial)	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
YTD 2021	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>1</b>	<b>1,738</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1,738</b>
Qualified Grants & Donations	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>1,738</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1,738</b>
<i>Source: Bank data</i> <i>*Activity since May 30, 2018</i>										

The following lists the investment within the AA.

- **Affordable Housing** – The bank maintains an investment in a mortgage-backed security that has a current book value of \$1.7 million. The investment is secured by a loan for a multi-family unit for LMI families.

**Responsiveness to Credit and Community Development Needs**

CBL exhibits poor responsiveness to credit and CD needs. The bank only made one investment for \$1.7 million for affordable housing within this AA, and this level did not demonstrate adequate responsiveness.

**Community Development Initiatives**

CBL does not use innovative or complex investments to support CD initiatives in the AA.

**SERVICE TEST**

CBL demonstrated an adequate record regarding the Service Test in the Nashville MSA AA. Adequate records for CD services and reasonableness of business hours and services offered outweighed excellent accessibility of delivery systems to support this conclusion.

**Accessibility of Delivery Systems**

Delivery systems are readily accessible to all portions of the Nashville MSA AA. Excellent accessibility of branches in LMI geographies supports this conclusion.

The following table shows that in low-income geographies within this AA, the bank operated one branch and one ATM, exceeding the population percentage by 7.9 and 6.8 percentage points, respectively, reflecting an excellent level. The bank’s branch and ATM levels rises 25.1 and 17.3 percentage points, respectively, above the population percentage in moderate-income tracts, reflecting an excellent level.

<b>Branch and ATM Distribution by Geography Income Level</b>								
<b>Assessment Area: Nashville MSA</b>								
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	1	4.8	3,120	3.2	1	11.1	1	10.0
Moderate	12	57.1	50,900	52.7	7	77.8	7	70.0
Middle	8	38.1	42,568	44.1	1	11.1	2	20.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>96,588</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>

*Source: 2015 ACS data and Bank data  
Due to rounding, totals may not equal 100.0 percent*

Alternative delivery systems offered in this AA remain consistent with those discussed at the institution level.

**Changes in Branch Locations**

CBL did not open or close branch offices in the AA since the previous evaluation.

**Reasonableness of Business Hours and Services**

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the Nashville MSA AA, particularly LMI geographies or individuals. The business hours and services within this AA are consistent with the overall conclusion.

**Community Development Services**

CBL provides an adequate level of CD services in the Nashville MSA AA. The directors, officers, and employees provided 41 CD services, since the previous evaluation. The CD services focused on community services, economic development, and revitalization or stabilization activities. The level of CD services reflects an increase from the prior evaluation, when the bank provided only 12 CD services. The following table shows the number of CD services by purpose and year.

Community Development Services Assessment Area: Nashville MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2018*	0	4	2	0	6
2019	0	8	2	0	10
2020	0	10	2	1	13
2021 YTD	0	9	2	1	12
<b>Total</b>	<b>0</b>	<b>31</b>	<b>8</b>	<b>2</b>	<b>41</b>
<i>Source: Bank data</i> <i>*Activity since May 30, 2018</i>					

The following lists notable examples of the CD services within the AA.

- **Community Service** – A large number of bank employees teach the Literacy in Financial Education Program at schools throughout the AA. A majority of the students’ families in the schools served reflect LMI and qualify for the government’s free or reduced lunch programs.
- **Economic Development** - An executive officer serves on the Board of an economic development organization. This organization encourages economic development through job creation, thereby providing employment opportunities for LMI residents in the community.

## TENNESSEE NON-MSA AA – FULL-SCOPE REVIEW

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

This AA includes the following contiguous counties: Bedford, Clay, Coffee, DeKalb, Franklin, and Jackson. The following table shows that CBL operates 10 branch offices throughout this middle-Tennessee AA. The bank also operates nine ATMs in the AA.

<b>Office Locations Tennessee Non-MSA AA</b>				
<b>County/City/Office</b>	<b>Office Type</b>	<b>Census Tract Number</b>	<b>Census Tract Income Level</b>	<b>Office Opened or Closed Since Last Evaluation</b>
<b>Bedford County:</b> Shelbyville – 1602 North Main Street	Branch	9505.00	Middle	No
<b>Clay County:</b> Celina – 101 East Lake Ave	Branch	9550.00	Moderate	No
<b>Coffee County:</b> Manchester – 1270 Hillsboro Blvd Traders – 120 North Jackson Street Tullahoma – 412 West Lincoln Street	Branch Branch Branch	9705.00 9708.01 9710.00	Middle Middle Middle	No No No
<b>DeKalb County:</b> Alexandria – 100 North Public Square Liberty – 311 East Main Street Smithville – 735 South Congress Blvd	Branch Branch Branch	9203.00 9203.00 9202.00	Upper Upper Middle	No No No
<b>Franklin County:</b> Winchester – 2695 Decherd Blvd	Branch	9604.00	Moderate	No
<b>Jackson County:</b> Gainesboro – 116 S. Grundy Quarles Hwy	Branch	9603.00	Middle	No
<i>Source: Bank data and 2015 ACS data</i>				

### **Economic and Demographic Data**

Based on 2015 ACS data, the AA’s 40 census tracts include the following income designations: four moderate-, 28 middle-, and seven upper-income tracts, as well as one tract with no-income designation. The following table provides select demographic characteristics for this AA.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Tennessee Non-MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	40	0.0	10.0	70.0	17.5	2.5
Population by Geography	178,886	0.0	10.9	70.8	18.4	0.0
Housing Units by Geography	80,460	0.0	11.0	71.4	17.6	0.0
Owner-Occupied Units by Geography	48,696	0.0	8.4	71.8	19.8	0.0
Occupied Rental Units by Geography	20,190	0.0	16.4	70.2	13.4	0.0
Vacant Units by Geography	11,574	0.0	12.7	71.9	15.4	0.0
Businesses by Geography	9,629	0.0	11.5	70.1	18.3	0.2
Farms by Geography	600	0.0	5.8	73.8	20.3	0.0
Family Distribution by Income Level	48,358	19.4	17.5	20.3	42.9	0.0
Household Distribution by Income Level	68,886	21.6	15.0	17.9	45.5	0.0
Median Family Income Non-MSAs - TN		\$46,066	Median Housing Value			\$114,715
			Median Gross Rent			\$633
			Families Below Poverty Level			14.2%
<i>Source: 2015 ACS data and 2019 D&amp;B data</i>						
<i>Due to rounding, totals may not equal 100.0 percent</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification</i>						

On April 17, 2019, FEMA made a disaster declaration affecting Bedford, Clay, Coffee, DeKalb, and Jackson Counties due to severe storms. On April 2, 2020, FEMA made a disaster declaration affecting all counties in the AA due to the COVID-19 Pandemic. On April 21, 2021, FEMA made a disaster declaration affecting Bedford, Coffee, DeKalb, and Jackson Counties due to severe ice storms. On May 8, 2021, FEMA made a disaster declaration affecting Clay and Jackson Counties due to tornadoes.

One census tract in Clay County was distressed and underserved from 2018 through 2020. Three census tracts in Jackson County were distressed from 2018 through 2019.

Currently, major employers in the Tennessee Non-MSA AA include Tyson Foods, Inc., Crisplant, Inc., Federal Mogul Corporation, and Nissan Powertrain Assembly.

The following table presents the low-, moderate-, middle-, and upper-income ranges based on the 2019 FFIEC-updated median family income of \$50,100 for the Tennessee Non-MSA.



<b>Median Family Income Ranges – Tennessee Non-MSA</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2019 (\$50,100)	<\$25,050	\$25,050 to <\$40,080	\$40,080 to <\$60,120	≥\$60,120
<i>Source: FFIEC</i>				

The following table lists annual unemployment rates over the evaluation period for the AA, State of Tennessee, and nationwide.

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Bedford County	3.6	3.5	6.3
Clay County	5.0	5.7	8.2
Coffee County	3.4	3.4	6.0
DeKalb County	4.6	4.1	7.3
Franklin County	3.0	3.7	6.0
Jackson County	4.8	4.5	7.8
State of Tennessee	3.4	3.6	5.6
National Average	3.9	3.6	6.7
<i>Source: Bureau of Labor Statistics</i>			

### **Competition**

The AA includes a moderate level of competition for financial services. According to the FDIC Deposit Market Share report as of June 30, 2020, 19 financial institutions operated 53 offices within this AA. Of these institutions, CBL ranked first with a 13.3 percent deposit market share.

### **Community Contacts**

Examiners utilized a previously conducted community contact with a member of a local financial services firm to assist in identifying the credit needs of the community. The contact indicated that current economic conditions in the AA have declined due to the COVID-19 Pandemic with two area hospitals having recently closed as well. The contact indicated a need for remote work initiatives and workforce development training in the area. Finally, the contact indicated the primary credit needs of the area include home mortgage, small business, and consumer loans.

### **Credit and Community Development Needs and Opportunities**

Considering information obtained from the community contact, bank management, as well as demographic and economic data, examiners concluded that the primary credit needs of the AA include small business and home mortgage loans. Furthermore, as indicated by the community contact, as well as demographic and economic data, the AA CD needs primarily include affordable

housing, community services that benefit LMI individuals, economic development to support small businesses, and efforts that revitalize and stabilize the area due to the disaster designations.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE TENNESSEE NON-MSA AA**

### **LENDING TEST**

CBL demonstrated a good record under the Lending Test in the Tennessee Non-MSA AA. Excellent lending levels, excellent borrower profile, and good geographic distribution performance lifted the poor CD lending to support this conclusion.

#### **Lending Activity**

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

#### ***Small Business Loans***

Small business lending levels reflect excellent responsiveness to AA credit needs in the Tennessee Non-MSA AA. A moderate level of competition exists within the AA for small business loans. For 2019, the bank originated 161 total reportable small business loans totaling approximately \$13.6 million. CBL captured 7.0 percent of the market share by number.

The bank's activity ranks fifth out of 68 total lenders that reported 2,296 small business loan originations and purchases. This ranking lands the bank in the top 7.4 percent of lenders reporting such loans in the Tennessee Non-MSA AA.

#### ***Home Mortgage Loans***

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Tennessee Non-MSA AA. A high level of competition exists for home mortgage loans among the area's banks, credit unions, and non-depository mortgage lenders. For 2019, the bank originated 70 total reportable home mortgage loans totaling approximately \$10.7 million. CBL captured 1.1 percent of the market share by number.

The bank's activity ranks 22<sup>nd</sup> out of 322 total lenders that reported 6,362 home mortgage loan originations and purchases. This ranking lands the bank in the top 6.8 percent of lenders reporting such loans in the Tennessee Non-MSA AA.

#### ***Small Farm Loans***

Small farm lending levels reflect excellent responsiveness to AA credit needs in the Tennessee

Non-MSA AA. A moderate level of competition exists within the AA for small farm loans. For 2019, the bank originated 72 total reportable small farm loans totaling approximately \$3.2 million. CBL captured 31.7 percent of the market share by number.

The bank’s activity ranks first out of 17 total lenders that reported 224 small farm loans.

**Geographic Distribution**

The geographic distribution of loans reflects good penetration throughout the AA. Good home mortgage and small farmlending performance outweighed the adequate small business lending performance to support this conclusion.

***Small Business Loans***

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

The following table shows that the level of lending in moderate-income census tracts reflects similar performance to aggregate data, reflecting adequate performance.

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: Tennessee Non-MSA</b>						
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0.0	0	0.0	0	0.0
Moderate	11.5	11.9	19	11.8	1,363	10.0
Middle	70.1	66.7	107	66.5	10,316	75.5
Upper	18.3	21.4	35	21.7	1,987	14.5
Not Available	0.2	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>161</b>	<b>100.0</b>	<b>13,666</b>	<b>100.0</b>

*Source: 2019 D&B data, 2019 CRA Aggregate data, and 2019 CRA data  
Due to rounding, totals may not equal 100.0 percent*

***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects good penetration throughout the AA. The good performance in moderate-income geographies supports this conclusion.

The following table shows that the level of lending in the moderate-income census tracts exceeds aggregate data by 7.5 percentage points, reflecting good performance.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Assessment Area: Tennessee Non-MSA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0.0	0	0.0	0	0.0
Moderate	8.4	5.3	9	12.8	4,107	38.3
Middle	71.8	75.8	48	68.6	4,811	44.9
Upper	19.8	18.9	13	18.6	1,806	16.8
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>10,724</b>	<b>100.0</b>

*Source: 2015 ACS data, 2019 HMDA Aggregate data, and 2019 HMDA data  
Due to rounding, totals may not equal 100.0 percent*

### ***Small Farm Loans***

The geographic distribution of small farm loans reflects good penetration throughout the AA. The good performance in moderate-income geographies supports this conclusion.

The following table shows that the level of lending in moderate-income census tracts exceeds aggregate data by 11.3 percentage points, reflecting good performance.

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: Tennessee Non-MSA</b>						
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0.0	0	0.0	0	0.0
Moderate	5.8	8.1	14	19.4	440	13.5
Middle	73.8	73.1	47	65.3	2,631	80.5
Upper	20.3	18.8	11	15.3	196	6.0
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>3,267</b>	<b>100.0</b>

*Source: 2019 D&B data, 2019 CRA Aggregate data, and 2019 CRA data  
Due to rounding, totals may not equal 100.0 percent*

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among businesses and farms of different sizes and retail customers of different income levels in the AA. Excellent small business and small farm lending performance outweighed the adequate home mortgage lending performance to support this conclusion.

### ***Small Business Loans***

The distribution of borrowers reflects excellent penetration among businesses of different sizes. An excellent record of lending to businesses with GARs of \$1 million or less supports this conclusion.

As shown in the following table, the level of lending to small businesses with GARs of \$1 million or less rises significantly higher than aggregate performance and also exceeds business demographic data, reflecting excellent performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Tennessee Non-MSA</b>						
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	82.0	48.4	145	90.1	9,535	69.8
>\$1,000,000	4.3	--	16	9.9	4,131	30.2
Revenue Not Available	13.6	--	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>161</b>	<b>100.0</b>	<b>13,666</b>	<b>100.0</b>
<i>Source: 2019 D&amp;B data, 2019 CRA Aggregate data, and 2019 CRA data Due to rounding, totals may not equal 100.0 percent</i>						

### ***Home Mortgage Loans***

The distribution of borrowers reflects adequate penetration among retail customers of different income levels. The adequate record of lending to moderate-income borrowers outweighed the good record of lending to low-income borrowers to support this conclusion.

As shown in the following table, the level of lending to low-income borrowers exceeds aggregate data by 6.2 percentage points, reflecting good performance. The table further shows that the level of lending to moderate-income borrowers exceeds aggregate data by 3.0 percentage points, reflecting adequate performance. Examiners weighed performance to moderate-income borrowers more because aggregate performance is higher, reflecting more loan demand by these borrowers.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Assessment Area: Tennessee Non-MSA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	19.4	3.8	7	10.0	906	8.5
Moderate	17.5	12.7	11	15.7	489	4.6
Middle	20.3	20.3	15	21.4	1,560	14.5
Upper	42.9	42.6	32	45.7	7,358	68.6
Not Available	0.0	20.7	5	7.2	412	3.8
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>10,724</b>	<b>100.0</b>

*Source: 2015 ACS data, 2019 HMDA Aggregate data, and 2019 HMDA data  
Due to rounding, totals may not equal 100.0 percent*

### ***Small Farm Loans***

The distribution of borrowers reflects excellent penetration among farms of different sizes. An excellent record of lending to farms with GARs of \$1 million or less supports this conclusion.

As shown in the following table, the level of lending to farms with GARs of \$1 million or less rises significantly higher than aggregate performance and also exceeds farm demographic data, reflecting excellent performance.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>						
<b>Assessment Area: Tennessee Non-MSA</b>						
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	96.0	63.2	72	100.0	3,267	100.0
>\$1,000,000	1.5	--	0	0.0	0	0.0
Revenue Not Available	2.5	--	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>	<b>3,267</b>	<b>100.0</b>

*Source: 2019 D&B data, 2019 CRA Aggregate data, and 2019 CRA data  
Due to rounding, totals may not equal 100.0 percent*

### **Community Development Loans**

CBL has made a low level of CD loans in the Tennessee Non-MSA AA. Specifically, the institution granted one CD loan totaling \$700,000 during the evaluation period. The level of CD lending decreased since the previous evaluation where the bank granted six loans totaling \$1.7 million. The CD loan supported economic development efforts in the area, which was an identified need of the area, reflecting responsiveness. The following table displays CD lending by year and purpose.

Community Development Lending Assessment Area: Tennessee Non-MSA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2018*	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	1	700	0	0	1	700
2021 YTD	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>700</b>
<i>Source: Bank data</i>										
<i>*Activity since May 30, 2018</i>										

The following lists the CD loan within the Tennessee Non-MSA AA:

- ***Economic Development*** – The bank granted a loan for \$700,000 to finance farm operations in Clay County. The activity helped to create and retain jobs for LMI individuals in the area.

## **INVESTMENT TEST**

CBL demonstrated a very poor record under the Investment Test within the Tennessee Non-MSA AA. The lack of qualified CD investments and grants, very poor responsiveness, and very poor CD initiatives supports the rating.

### **Investment and Grant Activity**

CBL has a few, if any, qualified CD investments or grants, particularly those that are not routinely provided by private investors in the AA, which is consistent with the bank’s record at the prior evaluation.

### **Responsiveness to Credit and Community Development Needs**

CBL exhibits very poor responsiveness to credit and CD needs.

### **Community Development Initiatives**

CBL does not use innovative or complex investments to support CD initiatives in the AA.

## **SERVICE TEST**

CBL demonstrated an adequate record regarding the Service Test in the Tennessee Non-MSA AA. Adequate records accessibility of delivery systems and reasonableness of business hours and services offered lifted the poor CD services to support this conclusion.

**Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution’s Tennessee Non-MSA AA. Adequate accessibility of branches and ATMs in moderate-income geographies supports this conclusion.

The following table shows that the branch and ATM levels are consistent with the population percentage, reflecting an adequate record.

<b>Branch and ATM Distribution by Geography Income Level</b>								
<b>Assessment Area: Tennessee Non-MSA</b>								
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>ATMs</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	0	0.0	0	0.0	0	0.0	0	0
Moderate	4	10.0	19,410	10.8	1	10.0	1	11.1
Middle	28	70.0	126,641	70.8	7	70.0	7	77.8
Upper	7	17.5	32,835	18.4	2	20.0	1	11.1
NA	1	2.5	0	0.0	0	0.0	0	0
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>178,886</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>
<i>Source: 2015 ACS data and Bank data</i>								
<i>Due to rounding, totals may not equal 100.0 percent</i>								

Alternative delivery systems offered in this AA remain consistent with those discussed at the institution level.

**Changes in Branch Locations**

CBL did not open or close branch offices in the AA since the previous evaluation.

**Reasonableness of Business Hours and Services**

Services (including where appropriate, business hours) do not vary in a way that inconveniences portions of the Tennessee Non-MSA AA, particularly LMI geographies or individuals. The business hours and services within this AA are consistent with the overall conclusion.

**Community Development Services**

CBL provides a limited level of CD services in the Tennessee Non-MSA AA. The directors, officers, and employees provided eight CD services, since the previous evaluation. The CD services focused on community services and revitalization or stabilization activities. The level of CD services reflects a decrease from the prior evaluation, when the bank provided 15 CD services. The following table shows the number of CD services by purpose and year.



Community Development Services Assessment Area: Tennessee Non-MSA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2018*	0	1	0	0	1
2019	0	2	0	1	3
2020	0	1	0	1	2
2021 YTD	0	1	0	1	2
<b>Total</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>3</b>	<b>8</b>
<i>Source: Bank data</i> <i>*Activity since May 30, 2018</i>					

The following lists a notable example of the CD services within this AA.

- **Community Services** – A bank employee volunteers for bank day in a local elementary school. A majority of the students’ families in the school reflect LMI and qualify for the government’s free or reduced lunch programs.

## APPENDICES

### LARGE BANK PERFORMANCE CRITERIA

#### **Lending Test**

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

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

#### **Investment Test**

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

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

## Service Test

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

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

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

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

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

## SCOPE OF EVALUATION

<b>Citizens Bank of Lafayette</b>	
<b>Scope of Examination:</b> Full scope reviews were performed on the following AAs:  Nashville MSA Tennessee Non-MSA	
<b>Time Period Reviewed:</b>	05/30/2018 to 06/22/2021
<b>Products Reviewed:</b> Home Mortgage Loans: (01/01/2018 – 12/31/2020) Small Business Loans: (01/01/2018 – 12/31/2020) Small Farm Loans: (01/01/2018 – 12/31/2020)	

<b>List of Assessment Areas and Type of Evaluation</b>			
<b>Assessment Area</b>	<b>Type of Evaluation</b>	<b>Branches Visited</b>	<b>Other Information</b>
Nashville MSA	Full-scope	None	None
Tennessee Non-MSA	Full-scope	None	None

## GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

**Community Development Loan:** A loan that:

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

**Community Development Service:** A service that:

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

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

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

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

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

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

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

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (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.

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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



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## Community Reinvestment Act Notice

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

Your involvement is encouraged.

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

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

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



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Your involvement is encouraged.

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

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

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## HMDA Disclosure Statement

Home Mortgage Disclosure Act (HMDA) data about the Bank's residential mortgage lending is available online for review. The data shows geographic distribution of loans and applications, ethnicity, race, sex, age and income of applicants and borrowers, and information about loan approvals and denials. These datasets are available online at the Consumer Financial Protection Bureau (CFPB) website<sup>1</sup>. Additionally, HMDA data for many other financial institutions is also available at this website.

For HMDA Aggregate and Disclosure Statements collected **prior to 2017** users will have to go to the Federal Financial Institutions Examination Council (FFIEC) website<sup>2</sup> and perform the following steps to access statements online:

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

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

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

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

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

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

