

*Community
Bank* of Pickens
County



Community Bank of Pickens County
Community Reinvestment Act
Public File

Community Bank of Pickens County

C.R.A. File

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*Community
Bank* of Pickens
County



Section 1

Public Disclosure from Last CRA EXAM

PUBLIC DISCLOSURE

September 7, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Bank of Pickens County
Certificate Number: 35513

15 Sammy McGhee Boulevard
Jasper, Georgia 30143

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

10 10th Street NE, Suite 800
Atlanta, Georgia 30309-3849

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

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INSTITUTION RATING

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

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

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment area.
- The bank made a majority of the loans reviewed inside its assessment area.
- The bank's geographic distribution of small business and home mortgage loans reflects a reasonable dispersion throughout the assessment area.
- The bank's distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration to businesses of different sizes and borrowers of different income levels (including low- and moderate-income).
- The bank has not received any Community Reinvestment Act (CRA) related complaints during the evaluation period. Therefore, this factor did not affect the CRA rating.

The Community Development Test is rated Satisfactory.

The bank demonstrated an overall adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities for community development within its assessment area.

DESCRIPTION OF INSTITUTION

Background

Community Bank of Pickens County is a state-chartered community bank headquartered in Jasper, Pickens County, Georgia (GA), which is located in the northwestern portion of the state. The bank is a wholly-owned subsidiary of Community Banks of Georgia Inc., a one-bank holding company also headquartered in Jasper, Georgia. The holding company has one additional affiliate, Community Banks of Georgia Capital Trust, a non-operational shell company. The bank has not opened or closed any branches, and no merger or acquisition activity has occurred since the prior evaluation.

Community Bank of Pickens County received a Satisfactory rating at its previous FDIC CRA Performance Evaluation, dated October 22, 2019, based on Interagency Intermediate Small Institution Examination Procedures.

Operations

Community Bank of Pickens County operates two full service offices in Jasper, GA. Both locations provide a full range of products and services, including drive-through teller facilities and non-deposit-taking automated teller machine (ATM) access. Both offices are reasonably accessible within the assessment area and maintain identical hours of operation. The bank also opened a loan production office (LPO) in Canton, Cherokee County, GA on June 1, 2022, to originate commercial loans. Cherokee County is located adjacent to Pickens County.

Community Bank of Pickens County offers a variety of loan and deposit products and services to businesses and consumers. Loan products offered include commercial, construction, home mortgage, and consumer loans. The bank also offers longer term home mortgage products through a broker arrangement with a third party investor. The bank's primary focus remains commercial loans, including SBA and U. S. Department of Agriculture (USDA) lending.

Deposit products offered include personal and commercial checking accounts, savings accounts, money market deposit accounts, debit cards, and certificates of deposit. Other available deposit products include individual retirement accounts and a non-reloadable stored value gift card. Customers may access account information through alternative banking services, including the bank's website located at www.cbopc.com, a mobile banking application that includes deposit and payment features, and telephone banking. The bank also offers non-deposit taking ATM access at its LPO and 10 remote locations, including nine in Pickens County and one in neighboring Cherokee County.

Ability and Capacity

As of the June 30, 2022, Consolidated Reports of Condition and Income, Community Bank of Pickens County had total assets of \$550.6 million, total loans of \$305.0 million, total deposits of \$492.0 million, and total securities of \$51.8 million. As shown in the following table, commercial loans (loans secured by non-farm, non-residential properties and commercial and industrial loans) represent the

largest portion of the loan portfolio at 56.0 percent; followed by construction, land development, and other land loans at 22.7 percent; and, 1-4 family residential properties at 16.6 percent.

Loan Portfolio Distribution as of 6/30/2022		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	69,141	22.7
Secured by Farmland	3,944	1.3
Secured by 1-4 Family Residential Properties	50,757	16.6
Secured by Multifamily (5 or more) Residential Properties	1,808	0.6
Secured by Nonfarm Nonresidential Properties	151,432	49.7
Total Real Estate Loans	277,082	90.9
Commercial and Industrial Loans	19,298	6.3
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	8,670	2.8
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	25	0.0
Less: Unearned Income on Loans	<125>	<0.0>
Total Loans	304,950	100.0
<i>Source: Reports of Condition and Income. Due to rounding, total may not equal 100.0 percent.</i>		

Examiners did not identify any financial or legal impediments, other than legal lending limits, that would affect the bank’s ability to meet the credit needs of its assessment area. However, the relatively high level of competition from small and large financial institutions, credit unions, and non-depository mortgage lenders within the assessment area may have affected the availability of lending opportunities. In addition, the COVID-19 Pandemic may have affected lending during the evaluation period. Refer to the *Competition* section for additional details.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which to evaluate its CRA performance. The Community Bank of Pickens County has delineated one assessment area comprised of Pickens County, GA in its entirety, which is located within the Atlanta-Sandy Springs-Alpharetta, Georgia Metropolitan Statistical Area (MSA) [Atlanta MSA]. Bank management delineated the assessment area based on the main office and branch locations, the bank’s lending activities, and the areas that the bank can reasonably be expected to serve. The assessment area consists of whole geographies and does not arbitrarily exclude any low- or moderate-income areas. The bank’s assessment area remains unchanged since the previous evaluation.

Economic and Demographic Data

The bank’s assessment area consists of six census tracts, including two moderate-, three middle-, and one upper-income tracts. The following table presents select demographic information for the

bank's assessment area, according to the 2015 American Community Survey (ACS) Census and the 2021 Dunn & Bradstreet (D&B) data.

Demographic Information of the Assessment Area					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	6	0.0	33.3	50.0	16.7
Population by Geography	29,740	0.0	32.6	50.2	17.2
Housing Units by Geography	13,680	0.0	29.5	45.6	24.8
Owner-Occupied Units by Geography	8,687	0.0	31.2	45.8	23.0
Occupied Rental Units by Geography	2,599	0.0	32.5	57.6	9.9
Vacant Units by Geography	2,394	0.0	20.4	31.8	47.8
Businesses by Geography	3,446	0.0	22.1	67.8	10.1
Farms by Geography	165	0.0	31.5	58.2	10.3
Family Distribution by Income Level	8,597	22.6	20.0	22.3	35.1
Household Distribution by Income Level	11,286	25.0	18.5	17.9	38.6
Median Family Income MSA - 12060 Atlanta- Sandy Springs-Roswell, GA MSA		\$67,322	Median Housing Value		\$202,390
			Median Gross Rent		\$823
			Families Below Poverty Level		8.6%
<i>Source: 2015 ACS and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>					

The analysis of small business loans under the *Borrower Profile* criterion compares the distribution of businesses by gross annual revenues (GARs). According to the 2021 D&B data, there were 3,446 non-farm businesses operating within the assessment area. GARs for these businesses are:

- 91.2 percent with \$1 million or less,
- 2.6 percent with more than \$1 million, and
- 6.2 percent with unknown revenues.

Service industries represent the largest portion of businesses (33.4 percent), followed by non-classifiable establishments (22.0 percent); retail trade (10.2 percent); finance, insurance, and real estate (9.4 percent); and, various other sectors that make up the remaining percentages. Additionally, 65.5 percent of assessment area businesses have four or fewer employees and 94.6 percent operate from a single location. According to the *Georgia Department of Labor*, top employers in Pickens County include Piedmont Mountainside Hospital, Walmart Supercenter, Big Canoe Property Owners Association, Royston LLC, and the Home Depot.

Examiners used the Federal Financial Institutions Examination Council's (FFIEC) median family income (MFI) data to analyze the bank's home mortgage lending under the Borrower Profile criterion. The following table reflects the 2021 MFI ranges for the low-, moderate-, middle-, and upper-income categories in the Atlanta MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Atlanta MSA Median Family Income (12060)				
2021 (\$85,700)	<\$42,850	\$42,850 to <\$68,560	\$68,560 to <\$102,840	≥\$102,840
<i>Source: FFIEC</i>				

According to the *Bureau of Labor Statistics*, the unemployment rate in Pickens County increased in 2020 due largely to the COVID Pandemic. The rate declined during 2021 to a level below the pre-pandemic level. The following table reflects the unemployment rates and trends for the assessment area, State of Georgia, and nation during the evaluation period.

Unemployment Rates			
Area	2019	2020	2021
	%	%	%
Pickens County	3.2	4.8	2.8
State of Georgia	3.6	6.5	3.9
National Average	3.7	8.1	5.4
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a moderate level of competition from institutions located within the bank's assessment area. According to the *FDIC's June 30, 2021 Summary of Deposits Report*, three FDIC insured financial institutions operate six banking offices within the area. Of these institutions, Community Bank of Pickens County ranked second, with a 20.4 percent deposit market share. The top financial institution accounted for 76.9 percent of the deposit market share. Additionally, competition and demand is high for small business and home mortgage loans within the assessment area. The bank is not required to report its small business loan data and has elected not to do so. However, aggregate data for 2020 indicates there were 52 lenders in the market that reported 850 small business loans totaling \$36.8 million originated within the assessment area. During the same period, 218 mortgage lenders reported 2,233 home mortgage loans totaling \$506.6 million in the area. Peer lending data is not yet available for 2021.

Community Contact

As part of the CRA performance evaluation process, examiners contact third parties active within a bank's assessment area to gain insight regarding local economic conditions and assist in identifying credit needs and bank opportunities. This information helps determine whether local financial institutions are responsive to these needs and helps identify credit and community development opportunities available.

Examiners contacted a representative of an economic development organization located in Pickens County. The organization promotes trade, commerce, and job creation within the county. The contact indicated that small businesses financing continues to be a significant credit need in the area. The contact also indicated that the county's population growth and increasing housing values have presented a challenge for infrastructure and affordable housing.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, as well as information from the community contact, examiners determined that small business loans represent a primary credit need within the assessment area. The significant percentage of businesses with gross annual revenues of \$1 million or less (91.2 percent), the large percentage of small businesses in the assessment area with 10 or fewer employees (93.5 percent), and the large percentage of businesses that operate from a single location (94.6 percent) support this assessment. Affordable housing also represents a need, as 42.6 percent of families and 43.5 percent of households are low- or moderate-income.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the bank's previous evaluation dated October 22, 2019, to the current evaluation dated September 7, 2022. Examiners used Interagency Intermediate Small Institution Examination Procedures to evaluate the bank's CRA performance. These procedures include the Lending Test and the Community Development Test as described in the appendices.

Activities Reviewed

The bank's major product lines are commercial (small business) and home mortgage loans. Both loan categories are integral components of the bank's lending focus. For purposes of this evaluation, loan distribution analyses were conducted on small business loans and home mortgage loans. Small farm and consumer loans were not reviewed due to the lower volume of such originations compared to the aforementioned categories. Bank records indicate the lending focus and product mix remained consistent throughout the evaluation period.

For the Lending Test, examiners reviewed the number and dollar volume of small business and home mortgage loans. While the number and dollar volume of loans are presented, examiners focused on performance by number of loans as it is a better indicator of the number of businesses and individuals served.

The CRA evaluation includes an analysis of small business loans, as defined in the *Glossary*. During 2021, the bank originated 1,365 small business loans totaling \$96.9 million. Since address and business revenue information was not readily available, a sample of 72 small business loans totaling \$5.2 million was used to evaluate the bank's *Assessment Area Concentration* performance. Of the 72 sampled small business loans, 36 loans totaling \$3.0 million were originated within the assessment area and were used to evaluate *Geographic Distribution* and *Borrower Profile* performance. D&B data for 2021 and the percentage of businesses by geography provided the

standards of comparison for small business loans.

In 2020, the United States government established the Coronavirus Aid, Relief, and Economic Security Act and implemented the Paycheck Protection Program (PPP) through the Small Business Administration (SBA) to offer economic relief to small businesses adversely impacted by the COVID-19 Pandemic. In 2021, the bank originated 935 PPP loans totaling \$31.4 million in amounts of \$1 million or less. Of these, 383 PPP loans totaling \$11.1 million were originated inside the bank's assessment area. The PPP program ended in May 31, 2022.

The bank is not a Home Mortgage Disclosure Act (HMDA) reporter. Therefore, examiners reviewed the universe of 255 home mortgage loans totaling \$41.0 million originated during 2021. Of the 255 home mortgage loans originated, 140 loans totaling \$21.6 million were originated inside the assessment area. The universe of 255 home mortgage loans was used to evaluate the bank's *Assessment Area Concentration* performance. The universe of 140 home mortgage loans originated within the assessment area were used to evaluate *Geographic Distribution* performance. Since borrower income information was not readily available, a sample of 47 home mortgage loans totaling \$7.2 million that were originated within the assessment area were selected to evaluate *Borrower Profile* performance. The 2015 American Community Survey (ACS) data, the percentage of owner-occupied housing units by geography, and the percentage of families by income level were used for comparison purposes, respectively.

According to management, the bank's 2021 small business and home mortgage lending activities and performance are representative of the bank's activities and performance during the entire period since the previous evaluation.

For the Community Development Test, the bank provided information on community development loans, qualified investments, and community development services from October 22, 2019, through September 7, 2022. Examiners also considered qualified investments from the prior period, which were still outstanding.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Community Bank of Pickens County demonstrated reasonable performance under the lending test. The *Loan-to-Deposit Ratio*, *Assessment Area Concentration*, *Geographic Distribution*, and *Borrower Profile* performance support this conclusion.

Loan-to-Deposit Ratio

Community Bank of Pickens County's average net loan-to-deposit (NLTD) ratio is reasonable given the institution's size, financial condition, and assessment area's credit needs. The bank's NLTD ratio averaged 76.8 percent over the previous 12 calendar quarters from September 30, 2019, to June 30, 2022. During this timeframe, the bank's NLTD ratio ranged from a low of 61.1 percent, as of June 30, 2022, to a high of 88.9 percent, as of June 30, 2020.

While Community Bank of Pickens County has several competitors within its assessment area, there are no similarly situated institutions in terms of total asset, products, branch network, and markets served. Therefore, the bank’s average NLTD ratio was compared to that of a peer group, as defined by the Uniform Bank Performance Report (UBPR). The UBPR’s peer group includes commercial banks with total assets between \$300 million and \$1 billion. The Peer Group’s average NLTD ratio, at 75.0 percent, is slightly below the Community Bank of Pickens County’s average NLTD ratio of 76.8 percent for the same time period. The Peer Group’s NLTD ratio ranged from a low of 66.5 percent, as of March 31, 2022, to a high of 82.9 percent, as of September 30, 2019.

Assessment Area Concentration

A majority of loans were originated inside the bank’s assessment area. See the below table for details.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$(000s)	%	\$(000s)	%	
Home Mortgage	140	54.9	115	45.1	255	21,640	52.7	19,401	47.3	41,041
Small Business	36	50.0	36	50.0	72	2,984	57.6	2,199	42.4	5,183

Source: Home Mortgage Data from Bank records: 1/1/2021 - 12/31/2021; Small Business Data from Bank Records: 1/1/2021 - 12/31/2021

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Reasonable performance for small business and home mortgage lending support this conclusion.

Small Business Loans

The geographic distribution of small business lending reflects a reasonable dispersion throughout the assessment area. Small business lending in moderate-income census tracts exceeded demographics. Refer to the following table for details.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	22.1	12	33.3	448	15.0
Middle	67.8	23	63.9	2,515	84.3
Upper	10.1	1	2.8	21	0.7
Totals	100.0	36	100.0	2,984	100.0

*Source: 2021 D&B Data; Bank Data
Due to rounding, totals may not equal 100.0%*

Home Mortgage Loans

The geographic distribution of home mortgage lending reflects reasonable dispersion throughout the assessment area. The bank’s home mortgage lending in moderate-income census tracts was below demographics. However, 15.5 percent of families that reside in moderate-income census tracts earn incomes below the poverty level. As a result, these families may not meet minimum qualification standards to obtain a mortgage loan from a financial institution. Refer to the following table for details.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Moderate	31.2	33	23.6	4,703	21.7
Middle	45.8	98	70.0	15,203	70.3
Upper	23.0	9	6.4	1,734	8.0
Total	100.0	140	100.0	21,640	100.0
<i>Source: 2015 ACS, Bank Data Due to rounding, totals may not equal 100.0%</i>					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels in the assessment area. Reasonable performance for small business and home mortgage lending support this conclusion.

Small Business Loans

The distribution of small business loans reflects reasonable penetration of loans to businesses with GARs of \$1 million or less. As reflected in the following table, bank lending to businesses with GARs of \$1 million or less was below demographics. However, revenues were not available for nine (25.0 percent) of the sampled small business loans, which were all PPP loans. When considering only loans with available revenue information, lending to small businesses was 100.0 percent, which exceeds demographics. The following table reflects the distribution of small business loans among businesses of different sizes.

Distribution of Small Business Loans by GAR					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	91.2	27	75.0	2,584	86.6
>\$1,000,000	2.6	0	0.0	0	0.0
Revenue Not Available	6.2	9	25.0	400	13.4
Total	100.0	36	100.0	2,984	100.0
<i>Source: 2021 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%</i>					

Examiners also evaluated the sample of nine PPP loans originated inside the assessment area using loan size as a proxy for the size of the business served. A majority of the sampled PPP loans originated in the assessment area, by number, had loan amounts of less than \$100,000, further indicating that the bank is helping to serve the needs of small businesses in the assessment area. The following table reflects the distribution of the PPP loans by loan size.

Distribution of PPP Loans by Loan Size				
Loan Size	#	%	\$	%
< \$100,000	8	88.9	236	59.0
\$100,000 - \$249,999	0	0.0	0	0.0
Subtotal	8	88.9	236	59.0
\$250,000 - \$499,999	1	11.1	164	41.0
\$500,000 - \$1,000,000	0	0.0	0	0.0
Total	9	100.0	400	100.0
<i>Source: 2021 D&B Data, Bank Data</i>				

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate- income borrowers, is reasonable.

The bank’s home mortgage lending to low-income borrowers exceeded demographics. Additionally, the bank’s home mortgage lending to moderate-income borrowers was comparable to demographics. The following table reflects the distribution of home mortgage loans to borrowers of different incomes.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	22.6	14	29.8	2,198	30.6
Moderate	20.0	10	21.3	1,529	21.3
Middle	22.3	7	14.9	749	10.4
Upper	35.1	14	29.8	2,367	33.0
Not Available	0.0	2	4.2	336	4.7
Total	100.0	47	100.0	7,179	100.0
<i>Source: 2015 ACS; Bank Data</i>					
<i>Due to rounding, totals may not equal 100.0%</i>					

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

Community Bank of Pickens County demonstrated an overall adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities.

Community Development Loans

Community development lending reflects adequate responsiveness to assessment area needs. Community Bank of Pickens County originated 46 community development loans totaling approximately \$3.2 million during the evaluation period. Community development lending represents 0.6 percent of total assets and 1.1 percent of total loans, as of June 30, 2022. During the previous evaluation period, the bank made 14 community development loans totaling \$2.5 million, which represented 0.7 percent of total assets and 0.9 percent of total loans. The table below reflects community development lending by year and purpose.

Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	2	323	-	-	14	564	16	887
2021	2	475	2	154	2	69	24	1,636	30	2,334
YTD 2022	-	-	-	-	-	-	-	-	-	-
Total	2	475	4	477	2	69	38	2,200	46	3,221
<i>Source: Bank Records</i>										

Below are examples of notable community development loans originated during the evaluation period:

2020

- A \$263,963 loan made to a non-profit that provides services for addiction recovery to residents of Pickens County.
- Fourteen PPP loans made to revitalize and/or stabilize businesses in the bank’s moderate-income census tracts.

2021

- A \$95,000 loan made to an organization that provides emergency housing for children that are removed from their home by State agencies and placed in foster care.
- A \$164,000 mortgage loan made to a resident of Pickens County under the USDA rural loan program.
- A \$311,125 loan to finance multi-family properties that serve low- and moderate-income residents in Pickens County.

- Twenty-four PPP loans made to revitalize and/or stabilize businesses in the bank’s moderate-income census tracts.

Qualified Investments

Community Bank of Pickens County’s qualified investment activity reflects a reasonable responsiveness to the needs of its assessment area, considering the bank’s capacity, resources, and availability of opportunities. Qualified investments total approximately \$9.7 million and include three bonds totaling approximately \$9.7 million and 38 donations of \$27,400. This dollar amount of equity investments equates to 1.8 percent of total assets and 18.8 percent of total investments. During the previous evaluation period, the bank made two investments totaling approximately \$4.9 million and 44 donations totaling approximately \$23,000, representing 1.4 percent of total assets and 18.0 percent of total investments. The below table illustrates the bank’s qualified investments by year and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	2	3,927	0	0	2	3,927
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	1	5,800	0	0	1	5,800
YTD 2022	0	0	0	0	0	0	0	0	0	0
Subtotal	0	0	0	0	3	9,727	0	0	3	9,727
Qualified Grants & Donations	0	0	38	27	0	0	0	0	38	27
Total	0	0	38	27	3	9,727	0	0	41	9,754

Source: Bank Data

Qualified investments include a 2021 bond totaling \$5.8 million, as well as one prior period bond that remains outstanding. The bond was used to finance the Pickens County Comprehensive Strategic Plan for the acquisition, construction, and expansion of an aircraft hangar at the Pickens County Airport. The Comprehensive Plan includes an extension of the property, as well as the construction of a new hangar to generate new economic activity in the county. The second prior period investment relates to a Pickens County Development Authority bond financed to improve land for an industrial technology park. The County has developed the area around the park to provide housing for people over the age of 55, including those in need of medical assistance. The technology park is located in a middle-income geography (bordering a moderate-income geography) and assists in revitalizing the City of Jasper.

All donations supported community services through various organizations such as the Good Samaritan Health and Wellness Center, REACH Georgia, Community Assistance Resources and Emergency Services, and Appalachian Children’s Emergency Shelter (ACES).

Community Development Services

The bank has provided an adequate level of community development services to address needs in the assessment area. The services meet the definition of community development under the CRA and relate to the provision of financial services. During the evaluation period, Directors and officers provided approximately 77 instances of financial expertise, economic development, or technical assistance to entities within the assessment area. The level of community development services provided by the bank increased from the previous evaluation when there were 53 instances of financial services provided by employees. The below table details the bank’s involvement with community development services during the evaluation period.

Community Development Services			
Brief Service Description	Community Development Purpose	Technical Assistance/Direct Involvement by Bank Employee	Bank Product or Service
Veterans Checking - <i>Free checking account</i>			2019 – 2022
50+ Checking - <i>Free checking account</i>			2019 - 2022
Classic Checking – <i>Free checking account</i>			2021, 2022
Interest on Lawyer Trust Accounts (IOLTA) - <i>a method of raising money for charitable purposes, primarily the provision of civil legal services to indigent persons</i>			2019 – 2022
Housing Authority of the City of Jasper - <i>Board Member served on Board</i>	Affordable Housing	2019 – 2022	
Habitat for Humanity - <i>Banking officer serves on Board and Finance Committee</i>	Affordable Housing	2019 - 2022	
Northwest Georgia Regional Commission - <i>Banking officer serves on council</i>	Revitalize & Stabilize	2019 - 2022	
Pickens County Chamber of Commerce - <i>Banking officer served on the Board</i>	Economic Development	2019, 2020	
Downtown Development Authority - <i>Board Member serves as council chairman</i>	Economic Development	2019 - 2021	
Economic Development Council – <i>Bank Officer serves as the council chairman</i>	Economic Development	2020 - 2022	
Pickens County Chamber of Commerce - <i>Banking officer serves on the Board</i>	Economic Development	2020 - 2022	
Economic Development Council - <i>Board Member serves as the council chairman</i>	Economic Development	2019 - 2022	
Joint Economic Development Council - <i>Banking officer serves on council</i>	Economic Development	2019 - 2022	
Pickens County Chamber of Commerce - <i>Banking officer serves on the Board</i>	Economic Development	2019 - 2022	
Pickens County Certified Literate Community Program - <i>Banking officer serves on the Board as Treasurer</i>	Community Service	2019, 2020	
REACH Scholarship Committee – <i>Banking officer on the committee to evaluate scholarship recipients</i>	Community Service	2019, 2020	
Pickens County High School - <i>Banking officer presented financial literacy</i>	Community Service	2019, 2020	

Mountain Education Charter High School CTAE - <i>Banking officer presented financial literacy</i>	Community Service	2019, 2020	
Friends of Pickens Library – <i>Banking officer served as Treasurer</i>	Community Service	2019, 2020	
Pickens County Junior High School - <i>Banking officer presented financial literacy</i>	Community Service	2019, 2020	
Mountain Education Charter School Career Day - <i>Two banking officers presented financial literacy</i>	Community Service	2019, 2020	
Redemption Outreach – <i>Banking officer served on the Board</i>	Community Service	2019 - 2022	
Good Samaritan Health & Wellness Center - <i>Banking officer serves on the Board</i>	Community Service	2019 – 2022	
ACES - <i>Banking officer served on the Board</i>	Community Service	2019 - 2022	
<i>Source: Bank Records</i>			

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

Community Development Test

The Community Development Test considers the following criteria:

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

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*Community
Bank* of Pickens
County



Section 2

List of Branches, Hours, and ATM Locations

COMMUNITY BANK OF PICKENS COUNTY currently operates two full-service locations to serve our customers:

15 Sammy McGhee Blvd.
Jasper, GA. 30143
(706) 253 – 9600
Census Tract 0502.01

65 Cove Rd.
Jasper, Ga. 30143
(706) 253 – 9600
Census Tract 0502.02

Hours of Operation (Both Locations)

Lobby

Monday – Friday 9 AM to 5 PM
Saturday No Lobby Hours

Drive Thru

Monday – Friday 8 AM to 5 PM
Saturday 8 AM to 12 PM

COMMUNITY BANK OF PICKENS COUNTY currently operates a Loan Production Office to serve our customers:

1353 Riverstone Pkwy.
Canton, GA 30114
(770) 213-2080
Census Tract 0904.01

Hours of Operation

Lobby

Monday – Friday 9 AM to 5 PM

COMMUNITY BANK OF PICKENS COUNTY currently operates ATMs throughout the greater Pickens County and Cherokee County areas at the following locations:

ATM Locations

Community Bank Main Office *(Takes Deposits)*

15 Sammy McGhee Blvd.
Jasper, GA
Census Tract 0502.01

Amoco/Hill City

4631 Hwy. 53 W
Jasper, GA
Census Tract 0504.00

ATM Locations

Community Bank Cove Location

65 Cove Rd.
Jasper, GA

Census Tract 0502.02

Rocco's Pub *(Located Inside)*

47 Mountainside Village Pkwy #107
Jasper, GA

Census Tract 0505.00

Appalachian Gun & Pawn *(Located Inside)*

140 Shelby Lane
Jasper, GA

Census Tract 0505.00

Mountain View Citgo

Corner of Burnt Mtn. Rd. & Cove Rd.
Jasper, GA

Census Tract 0502.02

Bent Tree 19th Hole Restaurant

183 Little Pine Mtn. Rd.
Jasper, GA

Census Tract 0501.02

Holcomb's Crossing Shopping Center

10150 Ball Ground Hwy.
Ball Ground, GA

Census Tract 0901.01

Pickens County Courthouse *(Located Inside)*

50 N Main St.
Jasper, GA

Census Tract 0502.01

Arrowhead Country Club *(Located Inside)*

260 Camp Rd.
Jasper, GA

Census Tract 0502.02

Pickens Co. Rec. Center *(Located Inside)*

1329 Camp Rd.
Jasper, GA

Census Tract 0502.02

Riverstone Pkwy/Canton *(Takes Deposits)*

1353 Riverstone Pkwy #140
Canton, GA

Census Tract 0904.01

*Community
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Section 3

List of Branches Open or Closed in Past 2 Years

BRANCHES OPENED OR CLOSED PAST 2 YEARS

Community Bank of Pickens County has NOT opened or closed any branch locations in the past 2 years.



*Community
Bank* of Pickens
County



Section 4

List of Services Offered at Each Location

List of Services

At Community Bank of Pickens County, we want you to have a checking account that fits your needs. Our checking accounts require \$100 minimum to open.

CLASSIC CHECKING

- Unlimited check writing
- Debit card with no service charge
- Online banking with free Bill Pay
- No monthly service charge

INCENTIVE CHECKING

- Interest earned on daily balance
- Unlimited check writing
- Debit card with no service charge
- Online banking with free Bill Pay
- Monthly service charge waived with \$1,000.00 minimum balance, otherwise \$9.00 per month
- Basic checks free with \$5,000.00 balance, otherwise regular rates apply

VETERAN'S CHECKING

- Unlimited check writing
- Debit card with no service charge
- Online banking with free Bill Pay
- No monthly service charge
- Basic checks free

50 + CHECKING

- Unlimited check writing
- Debit card with no service charge
- Online banking with free Bill Pay
- No monthly service charge
- Basic checks free

COMMERCIAL CHECKING

- \$100.00 minimum to open
- No per check fee or analysis fee
- No fee for returned deposit items
- First order of basic business checks free
- Basic business checks available the next business day
- Business debit card with no service charge
- Online banking
- Monthly service charge waived with \$1,000.00 minimum balance, otherwise \$9.00 per month
- Unlimited check writing

BUSINESS PRODUCTS

BUSINESS ONLINE BANKING

- Access to multiple accounts
- Employee login credentials allow for extra security
- Administration rights
- 24/7 online banking access
- Display groups for transfers
- Internal and external fund transfers
- ACH file transfers (direct deposit payroll)
- Bill Pay

MERCHANT CAPTURE

- Deposit checks directly from your office anytime
- Consolidate funds from remote locations into one bank
- Saves time preparing deposits
- Allows for faster processing of checks by eliminating trips to the bank
- Reduces risk of check fraud

MERCHANT SERVICES

- Service to process credit card sales & point of sale equipment
- Our Banc Card rep comes to your location for setup

STATEMENT SAVINGS

- Opening deposit \$50.00
- Interest earned on daily balance
- No monthly service charge
- 3 free withdrawals per month
- \$1.00 service charge for each additional withdrawal over 3 per month
- 6 maximum withdrawals per month

BEE-GINNER'S SAVINGS

- 12 years of age & younger
- Opening deposit \$5.00
- Interest earned on daily balance
- No monthly service charge
- 3 free withdrawals per month
- \$1.00 service charge for each additional withdrawal over 3 per month
- 6 maximum withdrawals per month

MONEY MARKET

- Opening deposit - \$100.00
- Interest earned on daily balance
- Maximum of six withdrawals per month, including third party checks

CHRISTMAS CLUB SAVINGS

- Opening deposit \$25.00
- Interest earned on daily balance
- No monthly service charge.
- \$20.00 fee for withdrawals made prior to end of plan year

CERTIFICATES OF DEPOSITS

Enjoy the security of a guaranteed return when you open a Certificate of Deposit with a minimum deposit of \$500.00. A variety of maturities are available with automatic renewal to meet your needs.

INDIVIDUAL RETIREMENT ACCOUNT

An IRA is an Individual Retirement Account that offers customers tax advantages to set aside money for retirement. Community Bank offers Traditional and Roth accounts.

SAFE DEPOSIT BOX

Safe Deposit Boxes allow you to keep your valuables secure. The annual rent for these boxes are as follows:

- 3 x 5 - \$25.00
- 3 x 10 - \$40.00
- 5 x 10 - \$50.00
- 10 x 10 - \$75.00

ONLINE BANKING WITH FREE BILL PAY

Our online banking service allows you to securely access your accounts 24-hours a day from your computer.

- Check account balances
- View transactions
- View check or deposit images
- Transfer funds between your accounts
- Pay your CBOPC loan
- Set up bill payments
- Set up customized account alerts
- And much more!

INSTANT ISSUE DEBIT CARDS

For your convenience we offer Instant Issue debit cards that are available next business day.

BUSINESS LOANS

At Community Bank of Pickens County we work hard to understand your business. By understanding we can better assist your business with its financial needs.

CONSTRUCTION LOANS

Building or remodeling your home? Community Bank of Pickens County can help you with your construction financing.

PERSONAL LOANS

With competitive rates and great service, Community Bank of Pickens County has all of your financial needs covered. From home improvement to consolidation loans, our friendly loan officers will give you the attention you deserve and provide you with the quickest decisions possible.

SBA LOANS

- 7(a)
- 504
- SBA Express

USDA LOANS

- Business & Industry (B & I)
- Farm Service Administration (FSA)
- Community Facilities (CF)

SBA loans are specifically designed for Small Businesses, are guaranteed by the Government, and have numerous advantages when compared to conventional bank financing.

- Lower down payment requirements
- Loan amounts up to \$5,000,000
- Longer repayment terms of up to 25 years
- Less restrictive collateral requirements for businesses with good cash flow but have a collateral deficiency
- Loan proceeds can be used to purchase owner-occupied commercial real estate, equipment, inventory, refinance debt, secure working capital or to acquire an existing business.
- No balloon payments
- SBA loans can be structured so the small business has one loan payment to meet multiple needs.

CBOPC MOBILE BANKING APP is fast, secure, and free. Optimized for iOS and Android devices, it offers immediate secure banking access anywhere, anytime. Enjoy features such as:

- View your account balance without logging in with InstaBalance®
- Lookup transactions and view check images
- Transfer funds between your accounts
- Pay your CBOPC loan in an instant
- Pay bills and manage your pending payments
- Repay a friend for your share of the meal with **ZELLE®**
- Look up the nearest branch or ATM
- Debit Card Management
- Customized account notifications
- Deposit checks anywhere using your phone

Security and privacy of your information is always a top priority at Community Bank of Pickens County. We utilize the same security and encryption features that are available on our online banking system. The **CBOPC Mobile App** does not store any personal or financial information on your mobile device. You can feel confident when using our mobile service that you are safe with us!

DOWNLOAD THE CBOPC MOBILE APP

Smartphone users can take advantage of our Android™ or iPhone® Apps.

With Mobile Wallet, you can use Apple Pay®, Google Pay®, or Samsung Pay® with your Community Bank of Pickens County debit card to pay quickly and conveniently at checkout in stores, online, and for in-app purchases.

FAST

No more fumbling and forgetting your card – your mobile wallet is ready to use!

CONVENIENT

Mobile wallet payments are accepted at a growing number of merchants, in apps and online.

SECURE

Your card number is never exposed to merchants, keeping your transactions safe.

GETTING STARTED IS EASY

Simply choose your preferred mobile wallet and get started today.
Apple Pay® | Google Pay® | Samsung Pay®

TOUCH-TONE BANKING

Bank by phone 24 hours a day, 7 days a week using Community Bank of Pickens County's Touch-Tone banking. Just call (706) 253-TONE (8663) from any touch-tone phone, and the automated system will guide you through a simple menu of options.

Limits and fees - The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Check printing	Fee depends on style of check ordered
Money Order	\$3.00
Returned Item Fee (each)	\$35.00
The fees apply to overdrafts created by check, in person withdrawal, or other electronic means as applicable.	
Overdraft Fee (Paid Item) (each)	\$35.00
The fees apply to overdrafts created by check, in person withdrawal, or other electronic means as applicable.	
Account activity printout	\$1.00
Account research (per hour)	\$25.00
Stop payment - all items	\$25.00
Wire Transfer (Customer)	\$20.00
Wire Transfer (Foreign Outgoing)	\$50.00
Safe Deposit Box Key Replacement	\$100.00
Debit Card Replacement	\$5.00

A dormant account fee of \$5.00 will be charged each month if for ONE YEAR (previous) there is no activity or other indication in writing from you of an interest in this account.

Savings Account Withdrawals - You may make only three free withdrawals from your account each month. There will be a service charge of \$1.00 for each additional withdrawal.



Community Bank of Pickens County also offers the following option to our customers at both locations with these associated fees:

Safe Deposit Box

Safe Deposit Boxes allow you to keep your valuables secure. The annual rent for these boxes are as follows:

- **3 x 5 - \$25.00**
- **3 x 10 - \$40.00**
- **5 x 10 - \$50.00**
- **10 x 10 - \$75.00**

***Community
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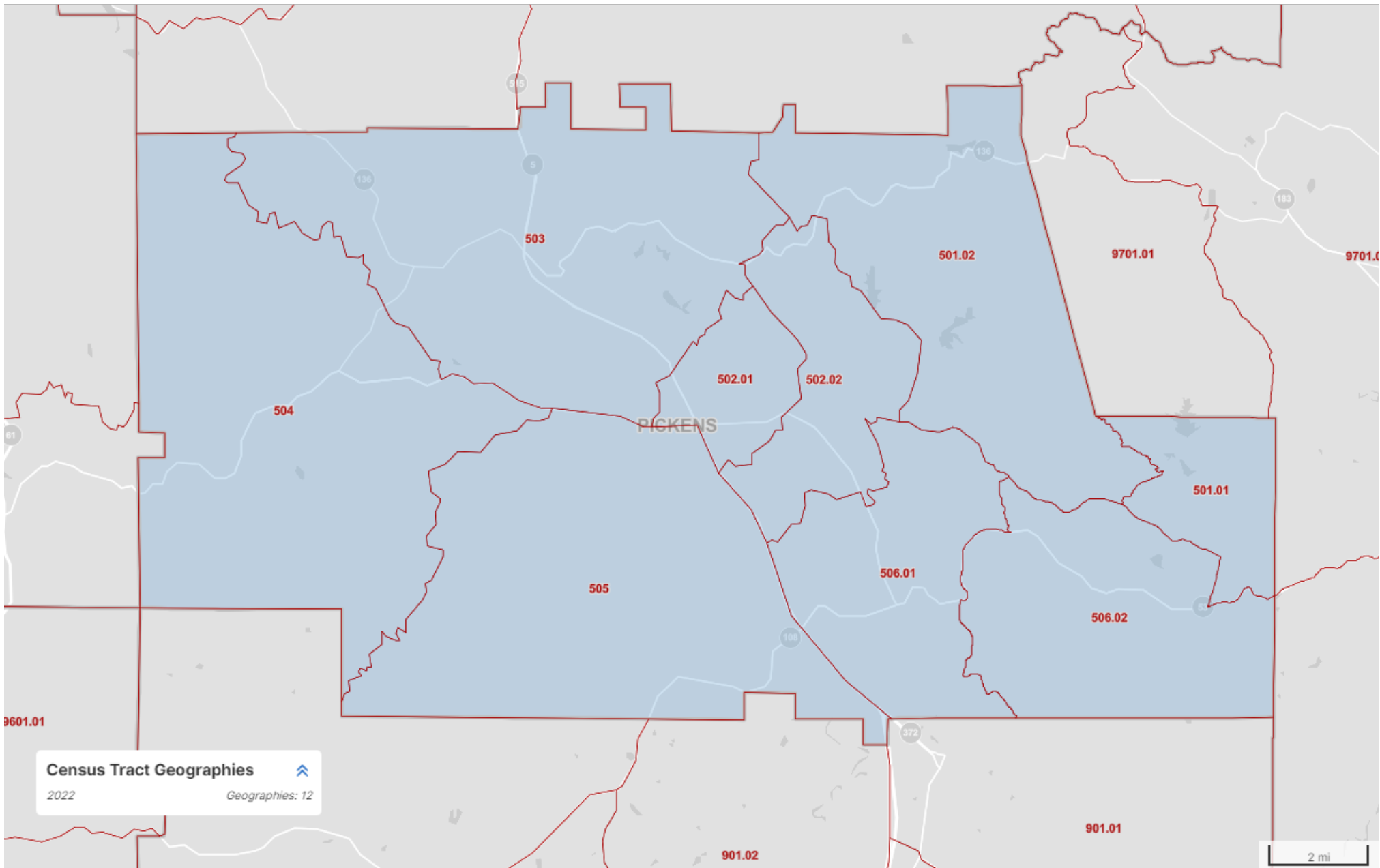
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Section 5

Map of Assessment Area

All Census Tracts within Pickens County, Georgia



2022 FFIEC Census Report - Summary Census Demographic Information

State: 13 - GEORGIA (GA)

County: 227 - PICKENS COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2022 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
13	227	0501.01	Upper	No	155.15	\$95,700	\$148,479	\$131,558	2487	5.59	139	1207	1747
13	227	0501.02	Middle	No	102.60	\$95,700	\$98,188	\$87,000	3388	6.94	235	1284	1719
13	227	0502.01	Middle	No	93.02	\$95,700	\$89,020	\$78,880	3855	15.10	582	786	1519
13	227	0502.02	Moderate	No	55.04	\$95,700	\$52,673	\$46,676	3442	10.66	367	619	936
13	227	0503.00	Middle	No	81.25	\$95,700	\$77,756	\$68,897	4666	9.24	431	1211	1723
13	227	0504.00	Moderate	No	76.04	\$95,700	\$72,770	\$64,483	3943	7.43	293	1162	1620
13	227	0505.00	Middle	No	87.65	\$95,700	\$83,881	\$74,327	5058	9.17	464	1130	1567
13	227	0506.01	Middle	No	107.55	\$95,700	\$102,925	\$91,196	4235	9.92	420	1542	1948
13	227	0506.02	Middle	No	91.80	\$95,700	\$87,853	\$77,841	2142	7.61	163	581	813

* Will automatically be included in the 2023 Distressed or Underserved Tract List

*Community
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Section 6
Loan to Deposit Ratios for Previous 3
Years

Community Bank of Pickens County

Loan to Deposit Ratio

2021

1st Qtr.	March 31, 2021	75.88%
2nd Qtr.	June 30, 2021	73.89%
3rd Qtr.	September 30, 2021	70.09%
4th Qtr.	December 31, 2021	68.56%

2022

1st Qtr.	March 31, 2022	64.65%
2nd Qtr.	June 30, 2022	62.03%
3rd Qtr.	September 30, 2022	68.68%
4th Qtr.	December 31, 2022	74.01%

2023

1st Qtr.	March 31, 2023	76.30%
2nd Qtr.	June 30, 2023	76.41%
3rd Qtr.	September 30, 2023	77.75%
4th Qtr.	December 31, 2023	79.79%

2024

1st Qtr.	March 31, 2024	83.28%
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*Community
Bank* of Pickens
County



Section 7

Written Comments from the Public and Our Responses

Community Bank of Pickens County has NOT had any written comments from the public since our last examination. Therefore, **CBOPC** does NOT have any responses either.

**Community
Bank** *of Pickens
County*



*Community
Bank* of Pickens
County



Section 8

Other Information

*Community
Bank* of Pickens
County



Section 9
HMDA Disclosure Statement Provided
by CFPB

Community Bank of Pickens County

HMDA

Disclosure Statements

(Provided by CFPB)





HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials.

HMDA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protection Bureau's website:

www.consumerfinance.gov/hmda