



# **Community Bank of Pickens County**

## **Community Reinvestment Act**

### **Public File**

# Community Bank of Pickens County

## C.R.A. File

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## Section 1

# Public Disclosure from Last CRA EXAM

# **PUBLIC DISCLOSURE**

October 16, 2025

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Community Bank of Pickens County  
Certificate Number: 35513

15 Sammy Mcghee Blvd  
Jasper, Georgia 30143

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

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

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

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## INSTITUTION RATING

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

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

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment area.
- The bank originated a majority of its home mortgage and small business loans in its assessment area.
- The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The bank did not receive any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the Lending Test rating.

**The Community Development Test is rated Satisfactory.**

- The bank's community development performance demonstrates adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services. Examiners considered the bank'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-charted community bank headquartered in Jasper, Pickens County, Georgia (GA), which is 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, GA. The holding company has one additional affiliate, Community Banks of Georgia Capital Trust, a non-operational shell company. In addition, the bank has not opened or closed any branches, and no merger or acquisition activity has occurred since the previous evaluation.

Community Bank of Pickens County received a Satisfactory rating at its previous FDIC CRA Performance Evaluation, dated September 7, 2022, 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). The offices are reasonably accessible within the assessment area and maintain identical hours of operations. In addition, the bank operates a loan production office (LPO) in Canton, Cherokee County, GA, for the purpose of originating commercial loans. Cherokee County is located adjacent to Pickens County.

The Community Bank of Pickens County's business strategy continues to focus on commercial lending to effectively meet the credit needs in its assessment area. The bank offers a variety of loan and deposit products to businesses and consumers. Loan products offered include commercial, construction, home mortgage, and consumer. The bank also offers long-term home mortgage products through a broker arrangement with a third-party investor. In addition, the bank offers traditional deposit products such as personal and commercial checking, savings, money market deposit, certificates of deposit, and individual retirement accounts. Customers may access account information through alternative banking services, including the bank's website located at [www.cbopc.com](http://www.cbopc.com), a mobile banking application that includes deposit and payment features, and telephone banking. The bank offers five deposit taking ATMs across its two offices, the LPO, and two remote locations, as well as nine non-deposit taking ATMs at remote locations in Pickens and Cherokee Counties.

### **Ability and Capacity**

As of the June 30, 2025 Consolidated Reports of Condition and Income (Call Report), Community Bank of Pickens County had total assets of \$595.1 million, total loans of \$454.2 million, and total securities of \$54.6 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 (51.2 percent), followed by construction, land development, and other land loans (26.5 percent) and loans secured by 1-4 family residential properties (17.8 percent).

<b>Loan Portfolio Distribution as of 06/30/2025</b>		
<b>Loan Category</b>	<b>\$ (000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	120,415	26.5
Secured by Farmland	3,590	0.8
Secured by 1-4 Family Residential Properties	80,833	17.8
Secured by Multifamily (5 or more) Residential Properties	7,457	1.6
Secured by Nonfarm Nonresidential Properties	210,857	46.4
<b>Total Real Estate Loans</b>	<b>423,152</b>	<b>93.1</b>
Commercial and Industrial Loans	21,595	4.8
Agricultural Production and Other Loans to Farmers	-	-
Consumer Loans	9,456	2.1
Obligations of State and Political Subdivisions in the U.S.	-	-
Other Loans	201	-
Lease Financing Receivable (net of unearned income)	-	-
Less: Unearned Income	(180)	-
<b>Total Loans</b>	<b>454,224</b>	<b>100.0</b>

*Source: Reports of Condition and Income*

Examiners did not identify any financial or legal impediments, other than legal lending limits, which would affect the bank's ability to meet the credit needs of its assessment areas.

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Although Community Bank of Pickens County continues to delineate one assessment area, its assessment area has changed since the previous evaluation. Previously, the bank's assessment area consisted of only Pickens County, GA in its entirety. However, in October 2025, management added the northern portion of Cherokee County due to the increase in loan activity within the area as the result of the LPO. Pickens County is part of the Atlanta-Sandy Springs-Roswell, GA Metropolitan Division (MD), and Cherokee County is part of the Marietta, GA MD. These MDs are grouped together as the Atlanta-Sandy Springs-Roswell, GA Metropolitan Statistical Area (MSA).

The demographic composition of the bank's assessment areas also changed since the previous evaluation based on available census data. Specifically, the previous evaluation used the 2015 American Community Survey Census to delineate the bank's assessment area. However, in 2022, the Federal Financial Interagency Examination Council (FFIEC) released updates to the Metropolitan Statistical Areas (MSAs), MDs, states, counties, census tracts, and income-level indicators based on information collected during the 2020 United States (U.S.) Census. As a result, the number of census tracts increased and income classifications changed, which slightly impacted the bank's assessment area. The following table details the breakdown by income levels for the assessment area based on 2020 Census data.

Assessment Area Geographies						
Assessment Area County	Low-Income	Moderate-Income	Middle-Income	Upper-Income	NA*	Total
Pickens	-	2	6	1	-	9
Cherokee (Partial)	-	3	8	1	-	12
<b>Total</b>	<b>-</b>	<b>5</b>	<b>14</b>	<b>2</b>	<b>-</b>	<b>21</b>

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

## Economic and Demographic Data

The following table presents select demographic information from the 2020 U.S. Census and the 2024 Dun and Bradstreet (D&B) data.

Demographic Information of the Assessment Area ATL MSA CRA AA (Pickens & North Cherokee)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	21	0.0	23.8	66.7	9.5	0.0
Population by Geography	87,082	0.0	27.1	67.6	5.3	0.0
Housing Units by Geography	33,254	0.0	25.7	66.2	8.1	0.0
Owner-Occupied Units by Geography	22,611	0.0	18.1	72.7	9.2	0.0
Occupied Rental Units by Geography	7,541	0.0	49.0	50.4	0.6	0.0
Vacant Units by Geography	3,102	0.0	24.9	57.0	18.1	0.0
Businesses by Geography	7,246	0.0	28.0	66.1	6.0	0.0
Farms by Geography	184	0.0	23.4	73.4	3.3	0.0
Family Distribution by Income Level	21,686	22.4	19.7	24.3	33.7	0.0
Household Distribution by Income Level	30,152	25.2	18.2	20.9	35.8	0.0
Median Family Income MD - 12054 Atlanta-Sandy Springs-Roswell, GA MD	\$81,951	Median Housing Value			\$ 239,330	
		Median Gross Rent			\$997	
		Families Below Poverty Level			6.4%	

Source: 2020 Census And 2024 D&B Data (\*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenues (GARs). According to the 2024 D&B data, there were 7,246 non-farm businesses operating within the assessment area. The following are the GARs for these businesses:

- 92.7 percent with \$1 million or less,

- 1.5 percent with more than \$1 million, and
- 5.8 percent with unknown revenues.

According to North American Industry Classification System (NAICS), non-classifiable establishments represent the largest sector of businesses in the assessment area, followed by professional, scientific, and technical services; construction; and other services. The major employers throughout Cherokee County include Inafla Roof Systems, Inc., Lowes Home Centers, Inc., Northside Hospital Inc., Pilgrim's Pride Corporations, and Publix Super Markets, Inc. The major employers throughout Pickens County include Big Canoe Property Owners Association, Bojangles, Ingles Markets Inc., Lexington Precision Corp., and Magnum Contracting, LLC.

According to the U.S. Bureau of Labor Statistics, unemployment rates slightly increased in both counties, and the state, year-over-year during the evaluation period. The national average was consistent from 2022 to 2023, but increased in 2024. The unemployment rates in both counties were below the state and national averages from 2022 to 2024. The following table reflects the average annual unemployment rates and trends for the assessment area's county, state, and nation.

Area	Unemployment Rates		
	2022	2023	2024
	%	%	%
Cherokee County	2.5	2.6	2.9
Pickens County	2.6	2.8	2.9
State of Georgia	3.2	3.3	3.5
National Average	3.6	3.6	4.0

*Source: Bureau of Labor Statistics*

Examiners used the FFIEC's updated median family data to analyze the bank's home mortgage lending under the *Borrower Profile* criterion. The following table reflects the median family income ranges for the low-, moderate-, middle-, and upper-income categories in the Atlanta-Sandy Springs-Roswell, GA MD.

Atlanta-Sandy Springs-Roswell, GA MD Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2024 (\$81,951)	<\$40,975	\$40,975 to <\$65,560	\$65,560 to <\$98,341	≥\$98,341

*Source: FFIEC*

## **Competition**

The assessment area is moderately competitive in the financial services market. According to the FDIC's June 30, 2025, *Summary of Deposits Report*, 16 FDIC-insured financial institutions operate 50 offices in the assessment area. Of these institutions, Community Bank of Pickens County ranked 5<sup>th</sup> with a deposit share of 7.9 percent. The top five institutions accounted for 55.8 percent of the deposit share.

The bank is not required to collect or report its small business loan data and has elected not to report such data. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, aggregate data reflects the level of demand within the assessment area. According to the 2023 Peer Small Business Data, 97 lenders reported 9,857 small business loans totaling \$278.6 million in the assessment area, indicating a high degree of competition for this product. The top five institutions account for 88.0 percent of the small business market share. Two of the top five small business lenders have offices in the assessment area.

There is also a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2024, 290 lenders reported 3,667 residential mortgage loans totaling \$1.8 billion in the assessment area. Community Bank of Pickens County ranked 27th with a market share of 1.0 percent by number of loans. The top five home mortgage lenders accounted for 22.3 percent of the total market share by number of loans. None of the top five home mortgage lenders have offices in the assessment area.

### **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 conducted a community contact with a representative of an economic development organization serving Pickens County. The contact stated that the community, though stable, is currently going through stagnation as it is experiencing limitations of opportunities due to a lack of infrastructure and that the majority of the area is rural. As a result, the contact indicated there is a need for more affordable housing developments for seniors and families within the county. Overall, the contact provided positive feedback on the local financial institutions' willingness to meet the credit needs of the assessment area.

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

Considering demographic and economic data, as well as the community contact information, 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 \$1.0 million or less (96.7 percent), the percentage of businesses operating from a single location (95.2 percent), and the number of businesses with four or fewer employees (75.1 percent) supports this conclusion. Affordable housing also represents a need, as 42.1 percent of the families and 43.4 percent of the households are low- or moderate-income.

## SCOPE OF EVALUATION

### General Information

In evaluating Community Bank of Pickens County's CRA performance, examiners used the Interagency Intermediate Small Institution Examination Procedures, which consists of two tests: a Lending Test and a Community Development Test as defined in the Appendices. The evaluation period was from September 7<sup>th</sup>, 2022, to the current evaluation dated October 16, 2025. Refer to the *Appendices* for Intermediate Small Bank Performance Criteria for additional details.

### Activities Reviewed

The CRA regulation requires a review of an institution's lending performance in its defined assessment area with respect to small business, home mortgage, small farm, and consumer loans, if significant. Examiners evaluated the bank's lending data and determined that the major product lines are small business and home mortgage loans. No other loan types, such as small farm or consumer loans, represent a major product line. Therefore, these loan products were not reviewed during the evaluation.

The current evaluation includes a review of small business loans, as defined in the *Glossary*, originated between January 1, 2024, through December 31, 2024. Management considered this period representative of the bank's lending performance for the entire evaluation period. During this period, the bank originated 152 small business loans totaling \$26.3 million, of which all were reviewed for the *Assessment Area Concentration* performance. Examiners reviewed 104 of the 152 small business loans totaling \$15.9 million to evaluate the bank's *Geographic Distribution* performance. In addition, a sample of 51 of the 104 small business loans totaling \$7.5 million was used to evaluate the *Borrower Profile* performance, as gross annual revenue information was not readily available. D&B data for 2024 provided a standard of comparison for small business lending.

Community Bank of Pickens County was not subject to the Home Mortgage Disclosure Act (HMDA) reporting requirements in 2021 and 2022. However, the bank became subject to the HMDA requirements as of January 1, 2023, as home mortgage lending activity exceeded the data collection and reporting threshold. Consequently, all home mortgage loans originated from January 1, 2023, through December 31, 2023, and from January 1, 2024, through December 31, 2024, were considered for CRA purposes. The bank reported 47 home mortgage loans totaling \$18.4 million in 2023 and 56 home mortgage loans totaling \$15.7 million in 2024. Examiners did not identify any significant trends in the bank's home mortgage lending during this time that would materially affect conclusions. Therefore, the written analysis only includes the bank's 2024 HMDA lending because that is the most recent year in which aggregate data is available. Lending performance for 2024 was reviewed with any significant performance variances discussed, as applicable, under the *Geographic Distribution and Borrower Profile* criterion. The bank's HMDA loan data was compared to the 2020 U.S. Census and aggregate data for performance purposes.

The bank's small business lending received greater weight than home mortgage lending in determining overall conclusions. For both loan products reviewed, the *Geographic Distribution* and

*Borrower Profile* analyses included only loans originated inside the bank's assessment area. 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 emphasized performance by number of loans, as the number of loans is a better indicator of the number of individuals and businesses served.

For the Community Development Test, examiners reviewed information about community development loans, qualified investments, and community development services provided by the bank from September 7, 2022, through October 16, 2025. Additionally, any qualified investments that were made prior to, but still outstanding as of this evaluation date were considered.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

The bank's reasonable net loan-to-deposit (NLTD) ratio, a majority of loans made within the assessment area, and the reasonable geographic distribution and borrower profile performance support this conclusion. In addition, the bank did not receive any consumer complaints since the previous evaluation.

#### Loan-to-Deposit Ratio

Community Bank of Pickens County's net loan-to-deposit (NLTD) ratio is reasonable given its size, financial condition, and credit needs of the assessment areas. The bank's NLTD ratio averaged 79.9 percent over the previous 12 calendar quarters from September 30, 2022, through June 30, 2025. The bank's quarterly NLTD ratios ranged from a low of 68.7 percent as of September 30, 2022, to a high of 88.2 percent as of June 30, 2025, which reflects an overall upward trend during this period.

Examiners identified three similarly situated institutions based on asset size, banking structure, portfolio composition, geographic location, and discussions with management. As reflected in the following table, Community Bank of Pickens County's average NLTD ratio, over the same evaluation period, exceeded or was consistent with the Similar Situated Institutions' ratios. The following table shows the average NLTD ratio comparison data.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 6/30/2025 (\$000s)	Average Net LTD Ratio (%)
<b>Community Bank of Pickens County</b>	<b>595,140</b>	<b>79.9</b>
The Citizens Bank of Georgia	590,200	55.3
Peach State Bank & Trust	727,078	66.9
River City Bank	367,352	77.9

*Source: Call Reports as of 6/30/2025*

## Assessment Area Concentration

Community Bank of Pickens County originated a majority of its home mortgage and small business loans, by number and dollar volume, within the assessment area. The following table details the bank's lending inside and outside of the assessment area.

Lending Inside and Outside of the Assessment Area												
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage												
2023	30	63.8	17	36.2	47	13,393	72.9	4,991	27.1	18,384		
2024	35	62.5	21	37.5	56	8,111	51.7	7,576	48.3	15,687		
<b>Subtotal</b>	<b>65</b>	<b>63.1</b>	<b>38</b>	<b>36.9</b>	<b>103</b>	<b>21,504</b>	<b>63.1</b>	<b>12,567</b>	<b>36.9</b>	<b>34,071</b>		
Small Business												
2024	104	68.4	48	31.6	152	15,876	60.4	10,411	39.6	26,287		
<b>Subtotal</b>	<b>104</b>	<b>68.4</b>	<b>48</b>	<b>31.6</b>	<b>152</b>	<b>15,876</b>	<b>60.4</b>	<b>10,411</b>	<b>39.6</b>	<b>26,287</b>		

*Source: 2023 & 2024 HMDA reported data; Bank Data*

## Geographic Distribution

The bank's geographic distribution of loans reflects reasonable penetration throughout the assessment area. The bank's reasonable small business and home mortgage lending performance supports this conclusion.

### ***Small Business***

The geographic distribution of small business lending reflects reasonable dispersion throughout the assessment area. Small business lending in moderate-income census tracts was comparable to demographic data. The following table reflects the geographic distribution of small business loans within the assessment area.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate					
2024	28.0	31	29.8	5,521	34.8
Middle					
2024	66.1	73	70.2	10,355	65.2
Upper					
2024	6.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>104</b>	<b>100.0</b>	<b>15,876</b>	<b>100.0</b>

*Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.*

## ***Home Mortgage***

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. Home mortgage lending performance in moderate-income census tracts exceeded both aggregate and demographic data. The following table reflects the distribution of home mortgage loans within the assessment area.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Moderate						
2024	18.1	23.5	10	28.6	3,567	44.0
Middle						
2024	72.7	71.6	25	71.4	4,544	56.0
Upper						
2024	9.2	4.9	0	0.0	0	0.0
<b>Total</b>						
<b>2024</b>	<b>100.0</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>8,111</b>	<b>100.0</b>

*Source: 2020 Census; Imported Bank Data; 2024 HMDA Aggregate Data.*

## **Borrower Profile**

The borrower of distribution of loans reflects reasonable penetration among individuals of different income levels and businesses of different sizes. The bank's reasonable small business and home mortgage lending performance supports this conclusion.

### ***Small Business***

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. While the following table indicates a majority of the sampled small business loans was originated to small businesses, the bank's level of lending was below demographic data. However, the bank's performance is considered acceptable given the high level of competition in the area, with the top five small business lenders accounting for 88.0 percent of the market share.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%	
<= \$1,000,000						
2024	92.6	35	68.6	4,606	61.8	
> \$1,000,000						
2024	1.5	13	25.5	2,767	37.1	
Revenue Not Available						
2024	5.8	3	5.9	86	1.2	
<b>Total</b>						
<b>2024</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>7,459</b>	<b>100.0</b>	

*Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.*

## ***Home Mortgage***

The distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels. Home mortgage lending to low-income borrowers is considered reasonable in comparison to aggregate data, but is below demographic data. Home mortgage lending to moderate-income borrowers exceeded aggregate data and was comparable to demographic data.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>HMDA Aggregate % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low						
2024	22.4	6.0	1	2.9	22	0.3
Moderate						
2024	19.7	16.3	7	20.0	1,064	13.1
Middle						
2024	24.3	22.4	9	25.7	1,244	15.3
Upper						
2024	33.7	33.9	12	34.3	3,219	39.7
NA						
2024	0.0	21.4	6	17.1	2,562	31.6
<b>Total</b>						
<b>2024</b>	<b>100.0</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>8,111</b>	<b>100.0</b>

*Source: 2020 Census; Imported Bank Data; 2024 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.*

## **Response to Complaints**

The bank did not receive any CRA-related complaints since the prior evaluation; therefore, this criterion did not affect the Lending Test rating.

## **COMMUNITY DEVELOPMENT TEST**

Community Bank of Pickens County's community development performance demonstrates adequate responsiveness to community development needs within its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. The bank has also shown a leadership position in the provision of community development services.

## **Community Development Loans**

During the evaluation period, the bank originated, renewed, or refinanced 20 community development loans totaling \$14.3 million. The bank's community development lending activity represents 2.4 percent of total assets and 3.1 percent of total loans. This is a decrease in the number, but an increase in the dollar volume of community development loans since the previous evaluation

where the bank made 46 community development loans totaling \$3.2 million (0.6 percent of total assets and 1.1 percent of total loans). However, it is noted that of the 46 community development loans originated during the previous evaluation, 38 community development loans totaling \$2.2 million were Small Business Administration's Paycheck Protection Program (PPP) loans. The PPP was a temporary program implemented through the Coronavirus Aid, Relief, and Economic Security Act to provide economic relief to small businesses adversely impacted by the COVID-19 pandemic. With the exclusion of the PPP loans, the bank's community development loans decreased to eight loans totaling \$1.2 million at the previous evaluation. Given that the bank was responsive to the community development needs of its assessment area, favorable consideration was given to three community loans totaling \$9.9 million that benefitted a broader statewide area, including the bank's assessment area.

The community development loans supported community services, economic development, and revitalization or stabilization efforts in low- and moderate-income census tracts and to low- and moderate-income families and individuals. The bank's community development lending performance was below the two Similarly Situated Institution's ratios of 6.6 percent of total loans and 8.4 percent of total loans, respectively. The following tables detail the bank's community development lending activity by year and purpose during the evaluation period.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (partial)	-	-	-	-	1	589	1	500	2	1,089
2023	-	-	-	-	2	750	6	9,488	8	10,238
2024	-	-	1	43	1	282	1	17	3	342
2025 YTD	-	-	2	260	1	1,870	4	486	7	2,616
<b>Total</b>	-	-	<b>3</b>	<b>303</b>	<b>5</b>	<b>3,491</b>	<b>12</b>	<b>10,491</b>	<b>20</b>	<b>14,285</b>

*Source: Bank Data*

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Atlanta Assessment Area	-	-	3	303	5	3,491	9	641	17	4,435
Broader Statewide Activities	-	-	-	-	-	-	3	9,850	3	9,850
<b>Total</b>	-	-	<b>3</b>	<b>303</b>	<b>5</b>	<b>3,491</b>	<b>12</b>	<b>10,491</b>	<b>20</b>	<b>14,285</b>

*Source: Bank Data*

The following are examples of community development loans made within the bank's assessment area:

- In 2022, the bank refinanced an SBA 7(a) loan totaling \$589,000 where the original funds were used for equipment purchases and daily operations for the business. This loan helped to retain several positions for low- and moderate-income employees; thereby promoting economic development in the assessment area.
- In 2023, the bank originated an SBA 7(a) loan totaling \$650,000 for the acquisition of an existing car wash in Pickens County. This loan helped retain several positions for low- and moderate-income employees; thereby promoting economic development in the assessment area.
- In 2025, the bank originated an SBA 504 loan totaling \$1,870,000 for a business to build a convenience store. The funding of this loan created several low- and moderate-income jobs; thereby promoting economic development in the assessment area.

Below are examples of community development loans originated or renewed in the broader statewide area, which includes the bank's assessment areas:

- In 2022, the bank originated an SBA 7(a) loan totaling \$500,000 to a medical supply dealer located in a low-income geography. The funds were used to purchase equipment and for working capital for the business. The loan helped retain the current business in the area; thereby revitalizing and stabilizing the geography.
- In 2023, the bank originated an SBA 7(a) loan totaling \$5.0 million for the acquisition of commercial real estate and the construction of a retail package store in a moderate-income census tract. The funding of this loan attracted new businesses to the area and created permanent jobs for low- and moderate-income individuals; thereby revitalizing and stabilizing the geography.

### **Qualified Investments**

During the evaluation period, the bank did not make any new qualified investments; however, it maintained three prior period investments totaling \$4.9 million and made 88 qualified donations totaling approximately \$40,000 compared to 41 qualified investments and donations totaling \$9.8 million at the previous evaluation. Total qualified investments and donations equate to 0.8 percent of total assets and 9.0 percent of total securities compared to 1.8 of total assets and 18.8 of total securities at the previous evaluation. The bank's performance was comparable to both Similarly Situated Institutions' ratios of 0.7 percent and 0.5 percent of total assets and exceeded both institutions' ratios of 2.0 percent and 2.0 percent of total securities, respectively.

Qualified investments primarily benefited economic development, followed by community services. The following table reflects the bank's qualified investment and donation activity by purpose and year.

Qualified Investments by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals*	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	3	4,873	-	-	3	4,873
2022 (Partial Year)	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-
2025 (Year-To-Date)	-	-	-	-	-	-	-	-	-	-
<b>Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>3</b>	<b>4,873</b>	<b>-</b>	<b>-</b>	<b>3</b>	<b>4,873</b>
Qualified Grants & Donations	5	1	83	39	-	-	-	-	88	40
<b>Total*</b>	<b>5</b>	<b>1</b>	<b>83</b>	<b>39</b>	<b>3</b>	<b>4,873</b>	<b>-</b>	<b>-</b>	<b>91</b>	<b>4,913</b>

*Source: Bank Data, January 1, 2022, through September 30, 2025.*

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

- In the prior period, the bank invested in two private revenue bonds issued by the Development Authority of Pickens County with a current book value of \$3.8 million to finance the acquisition, construction, and expansion of the Pickens County Airport pursuant to the Pickens County Comprehensive Strategic Plan. The issuance of this bond created several low- and moderate-income positions; thereby promoting economic development in the area.
- In the prior period, the bank invested in a revenue bond issued by the Development Authority of Pickens County with a current book value of \$1.1 million to improve land for an industrial technology park pursuant to the Pickens County Comprehensive Strategic Plan, promoting economic development.
- The bank made a \$1,000 donation to an organization whose mission is to help provide food, clothing, shelter, and financial and educational assistance targeted to low- and moderate-income residents of Pickens County; thereby promoting community services.
- The bank made an annual \$800 donation to a Federally Qualified Health Center organization that helps to cover the medical care costs for uninsured low- and moderate-income residents of Pickens and surrounding counties; thereby promoting community services.

### **Community Development Services**

During the evaluation period, Board of Directors (Board) and bank employees provided 99 instances of financial expertise, economic development, or technical assistance to entities within the assessment area compared to 77 services at the previous evaluation. This performance equates to 16.0 services per branch per year during the current evaluation compared to 13.3 services per

branch per year at the previous evaluation. The following table details the bank's community development services, by year and purpose, performed during the evaluation period.

Activity Year	Community Development Services by Year				
	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022 (Partial)	3	6	6	1	<b>16</b>
2023	2	17	7	1	<b>27</b>
2024	2	20	6	1	<b>29</b>
2025 (YTD)	2	18	6	1	<b>27</b>
<b>Total</b>	<b>9</b>	<b>61</b>	<b>25</b>	<b>4</b>	<b>99</b>

*Source: Bank Data.*

Below are examples of community development services that benefited the assessment area.

- From 2022 through 2025, a bank employee served on the Board of an organization that provides free and/or low-cost healthcare, vision care, and dental care to low- and moderate-income individuals and families; thereby providing community services in the assessment area.
- From 2022 through 2025, a bank employee provided financial expertise for an organization that provides affordable housing to low- and moderate-income individuals and families in the assessment area.
- From 2022 through 2023, a bank employee served on the Board of an organization that provides economic development for the county. The organization provides support for existing businesses, including the retention of jobs for low- and moderate-income individuals. In addition, the organization promotes the area to attract new businesses and provides additional support to those new businesses.

## DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners evaluated the bank's compliance with anti-discrimination laws, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any evidence of 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.



## 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 (Takes Deposits)**  
4631 Hwy. 53 W  
Jasper, GA  
**Census Tract 0504.00**

## ATM Locations

**Community Bank Cove Location (Takes Deposits)**

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 Shell**

Corner of Burnt Mtn. Rd. & Cove Rd.  
Jasper, GA  
**Census Tract 0502.02**

**Bent Tree 19<sup>th</sup> Hole Restaurant (Located Inside)**

183 Little Pine Mtn. Rd.  
Jasper, GA  
**Census Tract 0501.02**

**Holcomb's Crossing (Takes Deposits)**

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**

**Pickens County Admin (Located Inside)**

1266 E Church Street  
Jasper, GA  
**Census Tract 0502.02**

**Rooster's Market (Located Inside)**

54 Roosters Way  
Jasper, GA  
**Census Tract 0503.00**



## 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.





## 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  
Bank** of Pickens  
County

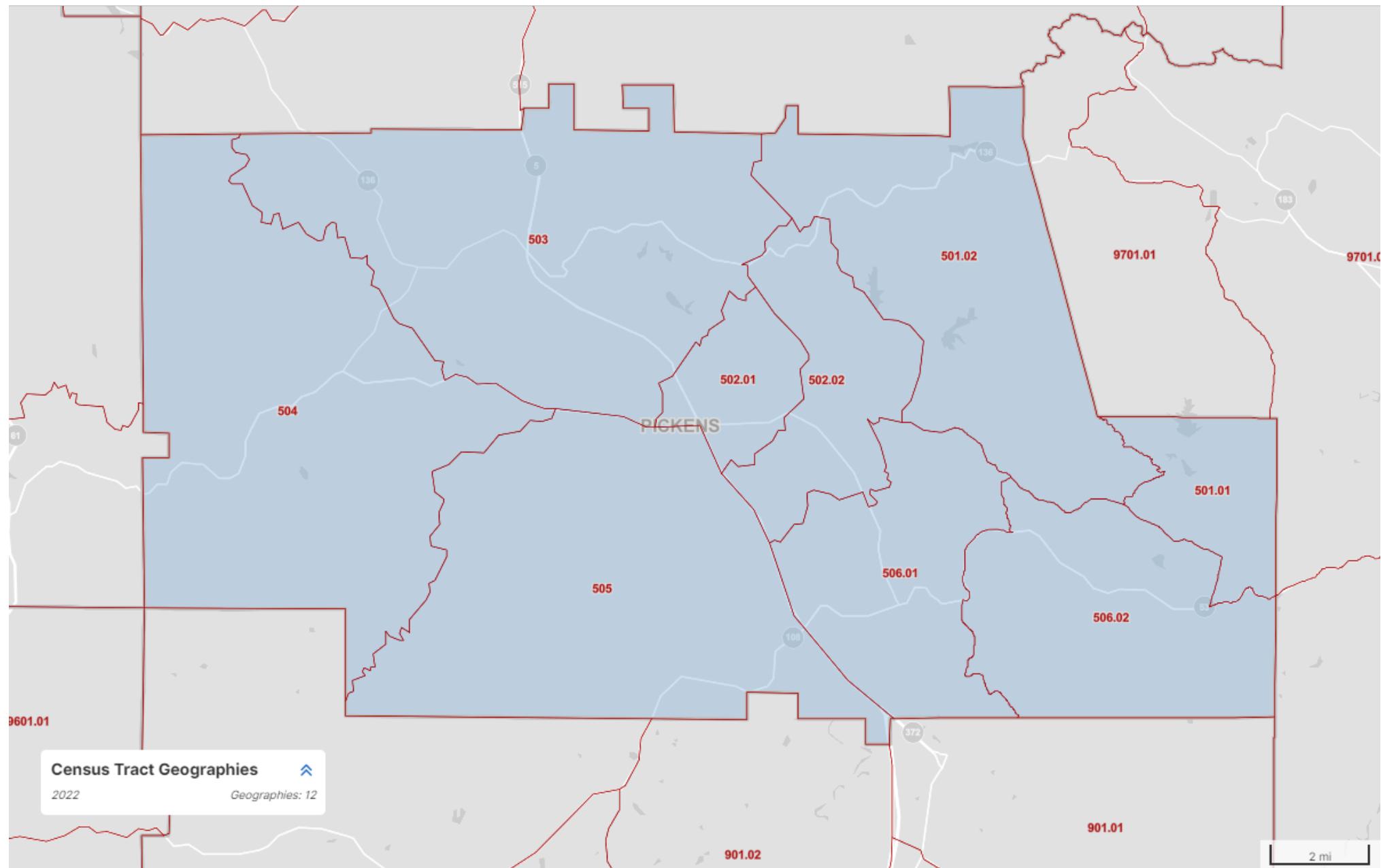




## Section 5

### 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



## Section 6

# Loan to Deposit Ratios for Previous 3 Years

# Community Bank of Pickens County

## Loan to Deposit Ratio

### 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%
2nd Qtr.	June 30, 2024	87.19%
3rd Qtr.	September 30, 2024	87.13%
4th Qtr.	December 31, 2024	86.33%

### 2025

1st Qtr.	March 31, 2025	85.14%
2nd Qtr.	June 30, 2025	89.58%
3rd Qtr.	September 30, 2025	86.23%
4th Qtr.	December 31, 2025	86.36%



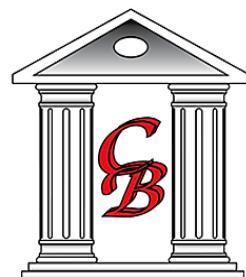


## Section 7

# 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





## Section 8

## Other Information



## Section 9

# HMDA Disclosure Statement Provided by CFPB

# **Community Bank of Pickens County**

**HMDA**

**Disclosure Statements**

**(Provided by CFPB)**





## HOME MORTGAGE DISCLOSURE ACT NOTICE

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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](http://www.consumerfinance.gov/hmda))