



PUBLIC DISCLOSURE

May 29, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of America
Charter Number 14740

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East Lansing, MI 48823

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Northern Ohio Field Office
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Cleveland, OH 44114-2301

NOTE: 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, and should not 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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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **First National Bank of America** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of America Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The institution’s distribution of loans among individuals of different income levels and businesses of different sizes throughout its assessment areas (AAs) is adequate.
- The institution’s geographic distribution of loans among geographies of different income levels throughout its AAs is adequate. The distribution of home mortgage loans in both its Lansing-East Lansing and Grand Rapids-Wyoming AAs is adequate, while the distribution of small loans to businesses in the Lansing-East Lansing AA is excellent and in the Grand Rapids-Wyoming AA is poor.
- The institution’s community development (CD) lending performance demonstrates responsiveness to CD needs in its Lansing-East Lansing AA, based upon its record of making qualified CD loans, and had a positive impact on the overall lending test rating.
- The institution provided an adequate level of qualified CD investments throughout its AAs that were responsive to CD needs.
- The institution’s performance in meeting CD service needs in both its Lansing-East Lansing AA and Grand Rapids-Wyoming AA is adequate, and bank delivery systems are reasonably accessible to both geographies and individuals of different income levels within the AAs.
- The institution’s level of lending activity within its AAs is low, but considered adequate.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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.

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, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent and less than 120 percent, in the case of a geography

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

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

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

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have

original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): 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, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

First National Bank of America (FNBA or bank) is a full-service intrastate bank headquartered in East Lansing, Michigan. As of December 31, 2016, the bank had \$1.1 billion in total assets. It is a wholly-owned subsidiary of First National Bancshares (FNB), a \$1.2 billion single-bank holding company also located in East Lansing, Michigan.

FNBA has subsidiaries and affiliates including First National Development Company (FNDC), as well as entities that perform loan servicing, conduct wholesale lending, administer foreclosure assets, and perform building management functions. FNDC performed no community development activities during our evaluation period, and the bank's other subsidiaries do not materially impact its community reinvestment capacity.

FNBA has three AAs, and one branch in each AA. The bank's primary AA is the Lansing-East Lansing Metropolitan Statistical Area (MSA), which is serviced by its East Lansing branch. The bank's second AA is a portion of the Grand Rapids-Wyoming MSA, comprised of Kent County, and is serviced by its Grand Rapids branch. The third AA is not located within an MSA. The Traverse City AA is comprised of Grand Traverse County, and is serviced by the bank's Traverse City branch. For additional detail regarding the AAs, refer to the Market Profile section in *Appendix B* of this report.

FNBA's three branch offices are all full-service facilities offering the same products. Drive-through teller services are only available at the Grand Rapids location. The bank provides access to a surcharge-free automated teller machine (ATM) network for customers at all three branches. The bank does not have any stand-alone drive-through locations or ATMs, and did not open or close any branches during the evaluation period.

FNBA's primary business is purchasing conforming residential real estate loans from other institutions. The bank also originates small loans to businesses, and non-conforming residential real estate loans. Non-conforming loans are loans that do not meet the specific criteria that allow a government-sponsored entity, such as Fannie Mae or Freddie Mac, to purchase them. The bank has experienced difficulty in finding loans to purchase within its own AAs during the evaluation period, due to pricing and competition from larger institutions. As of December 31, 2016, the bank's loan portfolio totaled \$1.02 billion, of which \$1 billion was secured by real estate. Of the real estate secured portfolio, 86.3 percent was 1-4 family residential, 6.7 percent was non-farm / non-residential real estate, 3.9 percent was multifamily, 2.4 percent was construction, and less than one percent was farm related. During the evaluation period, the bank originated or purchased \$871.5 million in loans. Of that amount, \$607.1 million (69.6 percent) was purchased. The bank originated \$172.2 million (19.75 percent) in non-conforming mortgage loans through a nationwide network of brokers and local customers, and \$92.7 million (10.6 percent) in commercial loans.

There are no legal, financial, or other factors impeding FNBA's ability to help meet the credit needs of the communities it serves. As of December 31, 2016, the bank had approximately \$105 million in Tier One capital, representing 14.3 percent of total assets. Brokered deposits represented 35.5 percent of total deposits, and the bank's net loans and leases to total assets ratio was 89.7 percent. FNBA received a rating of "Satisfactory" as a result of its previous CRA Performance Evaluation, which was dated July 7, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNBA's CRA performance within its AAs using CRA Large Bank procedures. This evaluation covers the period from January 1, 2014, through December 31, 2016. The procedures used to assess the bank's performance focused on its lending and CD activities. The evaluation period for assessing the bank's lending activity was from January 1, 2014, through December 31, 2016. The evaluation period for assessing the bank's CD lending, investments, and services was from July 7, 2014 (the date of our last performance evaluation), through December 31, 2016.

We evaluated FNBA's lending performance based on its primary loan products, which were home purchase loans, home refinance loans, and small loans to businesses. While the bank originated home improvement and multi-family loans, they are not a primary lending focus for the bank. The bank also makes only a very limited number of consumer and farm loans. Therefore, we did not consider these loan products as part of this evaluation, as an analysis of related data would not be meaningful.

We also utilized other supporting information while evaluating FNBA's CRA performance. This included 2010 Census Data, 2016 business demographic data, internal bank records, deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AA.

Data Integrity

This evaluation is based on reported loan data and qualifying CD activities. Prior to our evaluation, we tested the accuracy of the bank's reported HMDA loan data and small loans to businesses data, and determined that the information was accurate. We also reviewed CD loans, qualified investments, and CD services to ensure that they met the regulatory definition of CD.

Selection of Areas for Full-Scope Review

We performed full-scope reviews of FNBA's Lansing-East Lansing and Grand Rapids-Wyoming AAs. When determining the bank's overall CRA performance ratings, we placed greater emphasis on lending in certain AAs, and the bank's record of lending to borrowers of different incomes and businesses of different sizes. The bank's primary market is the Lansing-East Lansing AA, and approximately 67.0 percent of reported loans (from within the three AAs) and 64.0 percent of the bank's deposits originated from within the Lansing-East Lansing AA. Approximately 19.0 percent of reported loans (from within the three AAs) and 17.0 percent of the bank's deposits originated from within the Grand Rapids-Wyoming AA. The Traverse City AA was reviewed using limited-scope procedures. Refer to *Appendix A* for more information.

Ratings

FNBA's overall CRA performance rating is Satisfactory. The bank's overall rating is based primarily on its performance within the Lansing-East Lansing and Grand Rapids-Wyoming MSA AAs. In reaching our conclusion, we weighed information from the following performance criteria: lending within the AA, lending to borrowers of different incomes and to businesses of different sizes, geographic distribution of loans, and CD activities. We based our conclusions for the lending test on loan products weighted according to their relative volume. As a result, home mortgage activity was weighted greater than small loans to businesses. Among home mortgage products, home purchase lending received the most weight.

Other

FNBA's management team elected to have the bank evaluated under Large Bank performance standards.

We utilized information from three recent community contacts located within the Lansing-East Lansing and Grand Rapids-Wyoming MSAs, to gain an understanding of the community credit needs and opportunities in those AAs. We determined that there have been opportunities for financial institutions to make CD loans and qualified investments, and to provide CD services within the AA. This is further discussed within the Market Profile section in *Appendix B*.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

FNBA's performance under the lending test is rated "Low Satisfactory." Based on our full-scope reviews, the bank's lending performance in the Lansing-East Lansing Grand Rapids-Wyoming AAs is adequate.

Lending Activity

Refer to Table 1- Lending Volume in *Appendix C* for the facts and data used to evaluate FNBA's lending activity.

FNBA's lending activity during the evaluation period within its AAs was low, but considered adequate. The bank's overall lending volume throughout the evaluation period in both the Lansing-East Lansing and Grand Rapids-Wyoming AAs was lower than its relative position in the local deposit markets. The bank made 136 HMDA and CRA reportable loans totaling \$31.1 million within the Lansing-East Lansing AA, and 41 HMDA and CRA reportable loans totaling \$15.9 million within the Grand Rapids-Wyoming AA. FNBA's lending market shares have been below one percent in both the Lansing-East Lansing and Grand Rapids-Wyoming AAs, and rank 63rd and 122nd, respectively. Consideration was given to the bank's limited physical presence, its business strategy focus, and the fact that there are considerably more lenders originating or purchasing loans in these AAs than there are depository institutions with branch offices. Lenders include local and non-local depository institutions, as well as non-bank financial institutions.

According to June 30, 2016, FDIC deposit data, after brokered deposits (primarily non-local) are excluded, FNBA ranked eighth (8th) in deposits among 22 insured depository institutions in the Lansing-East Lansing AA, with a 5.0 percent market share. The bank ranked 18th in deposits among 24 insured depository institutions in the Grand Rapids-Wyoming AA, with a 0.4 percent market share. Since the bank's business strategy is to focus on buying conforming package loans, as well as to address the needs of non-conforming borrowers throughout the country, its lending activity within its local market area is considered adequate.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of FNBA's home purchase loans, home refinance loans, and small loans to businesses among CTs of different income levels in both the Lansing-East Lansing and Grand Rapids-Wyoming AAs is adequate. In determining our ratings for each AA, we gave consideration to factors detailed within *Appendix B – Market Profile of AA* section of this report that could affect the bank's ability to lend throughout each AA. These factors include competition, the bank's strategic focus, and the geographic location of the majority of the population, owner-occupied housing, and businesses.

Home Mortgage Loans

Refer to Tables 2 and 4 in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Lansing-East Lansing AA

The geographic distribution of FNBA's home purchase loans among geographies of different income levels in the Lansing-East Lansing AA is adequate. The percentage of the bank's home purchase loans in low-income CTs was comparable to the percentage of the AA's owner-occupied housing units located in those low-income CTs, and exceeded the aggregate lending percentage in those CTs. The percentage of the bank's home purchase loans in moderate-income CTs was slightly below both the percentage of the AA's owner-occupied housing units in those moderate-income CTs and the aggregate lending percentage in those CTs.

The geographic distribution of FNBA's home refinance loans is also adequate. While the bank did not originate or purchase any home refinance loans in low-income CTs during the evaluation period, the percentage of the bank's home refinance loans originated or purchased in moderate-income CTs exceeded both the percentage of the AA's owner-occupied housing units in those moderate-income CTs, and the aggregate lending percentage in those CTs.

Grand Rapids-Wyoming AA

The geographic distribution of FNBA's home purchase loans among geographies of different income levels in the Grand Rapids-Wyoming AA is adequate. The percentage of the bank's home purchase loans in low-income CTs was comparable to both the percentage of the AA's owner-occupied housing units in those low-income CTs, and aggregate lending percentage in those CTs. The percentage of the bank's home purchase loans in moderate-income CTs exceeded both the percentage of the AA's owner-occupied housing units in those moderate-income CTs and the aggregate lending percentages in those CTs.

FNBA did not originate or purchase a sufficient volume of home refinance mortgage loans to allow for quantitative analysis. As a result, these loans were not included in the evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, FNBA's performance under the Distribution of Loans by Income Level of the Geography test in the Traverse City AA was weaker than the bank's overall Low Satisfactory rating for the lending test. The weaker performance was due to a lack of loans originated or purchased in moderate-income CTs in that AA. It should be noted, however, that the Traverse City AA only has one moderate-income CT, which represents 6.3 percent of the total number of CTs in the AA. The AA does not have any low-income CTs.

Small Loans to Businesses

Refer to Table 6 in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

Lansing-East Lansing AA

The geographic distribution of FNBA's small loans to businesses in geographies of different income levels in the Lansing-East Lansing AA is excellent. The percentage of the bank's small loans to businesses in low- and moderate-income CTs significantly exceeded the percentage of the AA's total number of businesses located in those low- and moderate-income CTs. Of the 56 small loans to businesses originated or purchased by the bank during the three years analyzed, eight (8) were to businesses located in low-income CTs, and 22 were to businesses located in moderate-income CTs.

Grand Rapids-Wyoming AA

FNBA's volume of small loans to businesses in the Grand Rapids-Wyoming AA was not significant enough to allow for meaningful quantitative analysis. As a result, loans in this AA were not included in our evaluation.

Lending Gap Analysis

We analyzed FNBA's home mortgage and small business lending activity reports and maps over the evaluation period to identify any gaps in the geographic distribution of its loans. We did not identify any conspicuous and unexplained gaps.

Inside/Outside Ratio

This ratio represents an institution-wide calculation, and is not calculated for individual rating areas or AAs. The percentage of FNBA's total reportable mortgage loans that were originated or purchased within its AAs is low, which correlates with the bank's nation-wide lending strategy. The bank's business model and strategic focus is reliant upon purchasing packaged loans with the help of loan brokers from various parts of the country. Furthermore, a significant portion of the bank's deposits are brokered, and not from customers within its AAs. As a result, the low percentage of lending inside (versus outside) the bank's AAs had a neutral impact on our performance conclusions. During the evaluation period, the bank originated or purchased 2.3 percent of its total number, and 4.19 percent of its total dollar amount, of home the mortgage loans that it originated or purchased, from within its AAs. In addition, the bank originated or purchased 61.8 percent of its total number, and 65.4 of its total dollar amount, of the small loans to businesses that it originated or purchased, from within its AAs. The percentage of CD lending originations within the bank's AAs by number and dollar amounts of loans was 60.0 and 55.3 percent, respectively.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of FNBA's loans to borrowers of different income levels and businesses of different sizes throughout the AA is adequate. In drawing this conclusion, we

placed more weight on the bank's performance as it related to home purchase loans, given the larger volume of these loans originated or purchased during the evaluation period. Business lending performance was significant enough to positively impact the bank's rating. We also gave consideration to the level of competition within the bank's AAs, and its effect on limiting FNBA's ability to lend to borrowers of different incomes and businesses of different sizes. Finally, as shown in *Appendix B*, the 15.1 percent of the population in the Lansing-East Lansing, and 12.3 percent of the population in the Grand Rapids-Wyoming MSA is living below the poverty level. Given the respective median home values of \$147,218 and \$153,036 in the two AAs, it would be difficult for this segment of the low-income population to afford and maintain a home. Refer to *Appendix B* for demographic and poverty rate information.

Home Mortgage Loans

Refer to Tables 8 and 10 in *Appendix C*, in the PE, for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Lansing-East Lansing AA

FNBA's distribution of home purchase loans among borrowers of different income levels throughout Lansing-East Lansing AA is good. The percentage of the bank's home purchase loans that were to low-income borrowers was below the percentage of families in the AA that are low-income, but near the aggregate lending percentage to low-income borrowers. The percentage of the bank's home purchase loans that were to moderate-income borrowers exceeded both the percentage of families in the AA that are moderate-income, and the aggregate lending percentage to moderate-income borrowers.

FNBA's distribution of home refinance loans among borrowers of different income levels in the AA is adequate. During the evaluation period, the percentage of the bank's home refinance loans that were to low- and moderate-income borrowers was below the percentage of families in the AA that are low- and moderate-income. However, the percentage of the bank's home refinance loans that were to low-income borrowers did exceed the aggregate lending percentage to low-income borrowers.

Grand Rapids- Wyoming MSA AA

FNBA's distribution of home purchase loans among borrowers of different income levels throughout Grand Rapids-Wyoming AA is adequate. The percentage of the bank's home purchase loans that were to low-income borrowers was below the percentage of families in the AA that are low-income, but exceeded the aggregate lending percentage to low-income borrowers. The percentage of the bank's home purchase loans that were to moderate-income borrowers exceeded the percentage of families in the AA that are moderate-income.

FNBA did not originate or purchase a sufficient volume of home refinance mortgage loans to allow for quantitative analysis. As a result, these loans were not included in the evaluation.

Small Loans to Businesses

Refer to Table 11 in *Appendix C* for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Lansing-East Lansing AA

The borrower distribution of FNBA's small loans to businesses in the Lansing-East Lansing AA is good. The bank's percentage of loans to businesses with revenues of \$1 million or less was slightly lower than the percentage of area businesses that have revenues of \$1 million or less. Approximately 66.1 percent of the bank's business loans were to businesses with revenues of \$1 million or less, compared to the 78.76 percent of the businesses in the AA with revenues of \$1 million or less. Furthermore, the bank's percentage of small loans to businesses exceeded the aggregate lending percentage of 44.2 percent.

Grand Rapids-Wyoming AA

FNBA's volume of small loans to businesses in the Grand Rapids-Wyoming AA was not significant enough to allow for meaningful quantitative analysis. As a result, loans in this AA were not included in our evaluation.

Community Development Lending

Refer to Table 1 Lending Volume in *Appendix C* for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. Furthermore, Table 5 includes geographic lending data for all multifamily loans, including those that also qualify as CD loans. However, it does not list CD loans separately.

FNBA's CD lending performance is good, and has a positive impact on the bank's overall rating for the lending test. CD loan activity during the evaluation period consisted of 12 loans totaling \$7.1 million that were originated or purchased within the bank's AAs, and eight loans totaling \$5.7 million that were originated or purchased outside of its AAs but within the broader state-wide area.

Lansing-East Lansing AA

FNBA originated a relatively high volume CD loans during the evaluation period, which had a positive impact on its overall lending performance in the Lansing-East Lansing AA. The bank actively sought out CD lending opportunities within the AA, which resulted in 12 qualified loans totaling approximately \$7 million. All CD loans were for multi-family rental units with rents affordable to low- and moderate-income individuals. Some of the loans also supported revitalization efforts in low- and moderate-income geographies. Examples of CD lending that involve leadership or complexities include:

- A \$204,000 loan to fund an apartment building located in a moderate-income CT in Lansing, Michigan. Ten of the eleven units in the building provide subsidized housing.

- A \$710,000 loan to fund the renovation and end-financing for an apartment building located in a low-income CT in Lansing, Michigan. The property was previously unoccupied, and renovation helps to revitalize the neighborhood and provide affordable housing to low- and moderate-income individuals.

Grand Rapids-Wyoming AA

FNBA's CD lending had a neutral impact on the bank's lending performance within the Grand Rapids-Wyoming AA. The bank does actively seek CD lending opportunities within the AA, and did not originate any loans during the period of review due to the level of competition from larger institutions and the limited size of this single-county AA. FNBA did make one qualified CD loan for \$659,000 during the evaluation period in an adjacent county.

Product Innovation and Flexibility

The bank's performance under the lending test performance is not enhanced by innovative or flexible lending programs, and their effect on lending test performance is considered neutral. The bank's programs are not generally targeted to low- and moderate-income individuals and geographies, and their actual AA impact is low. FNBA offers flexible lending which can help address the credit needs of low- and moderate-income individuals and geographies, and are available in areas that include the bank's AAs. However, the majority of people who benefit from the programs are located outside of the bank's AAs. Through the Near-Miss Program, FNBA provides flexible financing to customers with impaired credit, and to homeowners who are at risk of losing their home because of delinquency.

FNBA has a Disaster Relief Program, through which the bank would defer loan payments for victims of national disasters and enter into forbearance agreements with borrowers pending foreclosure. The bank also is part of the FHLB of Indianapolis Participation Program, which provides down payment assistance and home rehabilitation subsidies to low-income borrowers. However, no participation occurred in either of these programs during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, FNBA's bank's distribution of home mortgage loans among borrowers of different income levels in the Traverse City AA was weaker than the bank's overall distribution of loans among borrowers of different income levels due to the low number of loans that the bank made during the evaluation period. Only two home purchase loans and one home mortgage refinance loan were originated or purchase by the bank within this AA during the evaluation period, with one being to a low- or moderate-income borrower. Furthermore, the bank only originated or purchased 41.4 percent of its small loans to businesses to businesses with revenues of \$1 million or less. The lack of CD loans also contributed to the weaker performance. Due to the relative size of the AA and associated activity levels, performance in the limited-scope area did not materially impact the bank's overall lending test rating. Refer to Tables 1 through 13 in *Appendix C* for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

FNBA's performance under the investment test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in meeting investment needs within the Lansing-East Lansing AA is adequate, and its performance in meeting investment needs within the Grand Rapids-Wyoming AA is good. Refer to Table 14 in *Appendix C* for the facts and data used to evaluate the bank's level of qualified investments.

FNBA is responsive to the CD needs of its AAs. During the evaluation period, the bank made qualified investments and donations totaling \$3.5 million within its AAs. As of December 31, 2016, this represented 3.3 percent of the bank's Tier One capital. There were no investments made during prior evaluation periods that were still on the bank's books as of December 31, 2016.

Lansing-East Lansing AA

FNBA's performance in meeting investment needs in its Lansing-East Lansing AA is adequate. The bank invested \$577,000 in four qualified investments and donations during the evaluation period. Current investments consist of the following:

- Investments in qualifying Fannie Mae pools, through Community Capital Management, totaling \$567,000. Out of three pools, the bank earmarked four loans within its AA. The pools are comprised of loans to low- and moderate-income first-time, repeat, and refinancing homeowners.
- An investment in a qualifying Ginnie Mae Real Estate Mortgage Investment Conduit (REMIC) Trust, totaling \$5,000. The earmarked investment assists a local senior housing organization that provides affordable housing through Section 8 assistance.
- Financial grants and in-kind donations, totaling \$5,000, to 10 local community organizations for CD initiatives including affordable housing and social services for low- and moderate-income individuals.

Grand Rapids-Wyoming AA

FNBA's performance in meeting investment needs in its Grand Rapids-Wyoming AA is good. The bank invested \$1.6 million in five qualified investments and donations during the evaluation period. Current investments consist of the following:

- Investments in qualifying Fannie Mae pools, through Community Capital Management and a Community Development Fund, totaling \$1.6 million. Out of five pools, the bank earmarked 11 loans within its AA. The pools are comprised of loans to low- and moderate-income first-time, repeat, and refinancing homeowners.

- Financial grants and in-kind donations, totaling \$4,000, to 8 local community organizations for CD initiatives including affordable housing and social services for low- and moderate-income individuals.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the FNBA's performance under the Investment Test in the Traverse City non-MSA AA was consistent with the bank's overall "Low Satisfactory" rating for the Investment Test.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

FNBA's performance under the Service Test is rated "Low Satisfactory". Based on a full scope review, the bank's performance in meeting the service needs in both its Lansing-East Lansing AA and Grand Rapids-Wyoming AA is adequate. Retail banking services are weighted more heavily than CD services in determining the overall service test rating.

Retail Banking Services

Refer to Table 15 in *Appendix C* for facts and data used to evaluate the distribution of the FNBA's branch delivery system, and branch opening and closings.

FNBA's delivery systems are reasonably accessible to geographies and individuals of different income levels within its three AAs. As noted in the *Description of Institution* section, the bank operates three full-service branches, with one in each AA. Two branches have 24-hour ATM machines, and the bank also offers customer access to surcharge-free ATMs through the Allpoint™ ATM network (whose ATMs are located throughout the AA and nationwide). During the evaluation period, the bank did not open or close any branches. While the bank does not operate any branches within low- or moderate-income CTs, two branches are located adjacent to at least one moderate-income CT. The bank's hours, days of operation, and available services do not inconvenience any portion of the AA. The Lansing-East Lansing AA branch is open 30 minutes longer than the others, due to a large volume of commercial deposits and customer demand. Services offered are comparable, regardless of the location and income level of the CT.

FNBA offers alternative delivery systems to further support access to retail banking services to low- and moderate-income individuals. However, specific data is not available regarding the impact of alternative delivery systems on low- and moderate-income individuals and geographies. Alternative delivery systems to individuals includes financial services via online, mobile, and text banking. The bank also has a multi-lingual staff to assist customers as needed.

Community Development Services

FNBA demonstrates a good level of responsiveness to community needs by providing a variety of CD services through financial and technical expertise.

Lansing-East Lansing AA

FNBA's employees provide a good level of CD services within this AA. During the evaluation period, bank records reflect 728 hours of employee time was afforded to CD programs. Five employees volunteered for six organizations. Employees provided technical and financial expertise to non-profit groups involved in affordable housing, social services for low- or moderate-income individuals, economic development, and financial literacy through the following activities:

- Multiple employees sit on the boards of organizations primarily focused on providing social services, with one serving on a budget target task force.
- An employee served on the board of a non-profit that provides housing for low- and moderate-income individuals and families.
- Two employees provided financial literacy presentations to different classes in two schools. Over 50 percent of the students attending the schools qualify for free or reduced-cost lunches.

Grand Rapids-Wyoming AA

FNBA's employees provide an adequate level of CD services within this AA. During the evaluation period, bank records reflect 95 hours of employee time was afforded to CD programs. Two employees volunteered for three organizations. Employees participated in several qualified service activities targeted to low- and moderate-income individuals, such as serving on a board and giving presentations on financial literacy. For example:

- An employee sits on the board of an organization, located in a low-income CT, whose primary focus is on providing social services to women.
- Employees provided financial literacy presentations targeting to classes in schools with over 50 percent of students qualifying for free or reduced-cost lunches.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, FNBA's performance under the Service Test in its Traverse City AA was consistent with the bank's overall "Low Satisfactory" rating for the Service Test (given the bank's level of deposits in the AA).

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 1/01/2014 to 12/31/2016 Investment and Service Tests, and CD Loans: 7/07/2014 to 12/31/2016	
Financial Institution	Products Reviewed	
First National Bank of America (FNBA) East Lansing, Michigan	Home mortgage loans, small loans to businesses, community development loans, qualified investments and community development services	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Lansing-East Lansing, MI MSA (29620)	Full-Scope	Full MSA: Clinton, Eaton, and Ingham Counties
Grand Rapids – Wyoming, MI MSA (24340)	Full-Scope	Partial MSA: Kent County
Traverse City (non-MSA)	Limited-Scope	Non-MSA: Grand Traverse County

Appendix B: Community Profiles for Full-Scope Areas

Lansing-East Lansing, MI MSA

Demographic Information for Full-Scope Area: Lansing – East Lansing, MI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	131	6.11	21.37	43.51	21.37	7.63
Population by Geography	464,036	5.23	19.33	47.52	24.26	3.67
Owner-Occupied Housing by Geography	123,057	3.56	15.04	52.88	28.49	0.03
Businesses by Geography	24,474	3.81	24.18	41.97	27.81	2.23
Farms by Geography	1,332	1.58	6.31	65.99	25.53	0.60
Family Distribution by Income Level	112,894	20.56	17.77	21.91	39.77	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	43,267	9.79	25.10	49.11	15.99	0.00
Median Family Income	= \$64,523					
HUD Adjusted Median Family Income for 2016	= \$65,600					
Households Below the Poverty Level	= 15.09%					
				Median Housing Value	= \$147,218	
				Unemployment Rate	= 4.2%	

(*) The NA category consists of geographies that have not been assigned an income classification. Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The Lansing-East Lansing MSA AA consists of the entire Lansing-East Lansing, Michigan MSA, and includes the counties of Clinton, Eaton, and Ingham in the central part of Michigan's Lower Peninsula. The area is a mix of urban, suburban, and rural neighborhoods, with the cities of Lansing and East Lansing being the focal points. Lansing is Michigan's capital, is the third largest metropolitan area in the state behind Detroit and Grand Rapids, and contains most of the AA's low- and moderate-income CTs. Michigan State University is based in East Lansing. The AA is comprised of contiguous geographies, and does not arbitrarily exclude any low- or moderate-income areas. No changes to the AA's profile with regard to CT configurations and income category designations have occurred since the last evaluation period.

The AA has experienced population growth greater than the average growth rate for the State of Michigan. Since 2010, the U.S. Census Bureau estimates that the overall population of the AA has increased by 1.8 percent (with Clinton County seeing the greatest growth at 2.7 percent), compared with the state population growth of 0.4 percent. Based on 2010 U.S. Census data, the AA includes 131 CTs, of which eight (8) are designated as low-income CTs, 28 as moderate-income CTs, 57 as middle-income CTs, and 28 as upper-income CTs. Ten CTs have no income designation.

The population of the AA equated to 464,036 persons and 112,894 families. In addition, there were 123,057 owner-occupied households. The percentage of families in each income level

within the AA are identified in the table above. In aggregate, 43,267 families in the AA are designated low- or moderate-income. Demographic data also indicates that 15.1 percent of households are below the poverty level, and that 23.6 percent of the number of households derive income from social security or public assistance.

The AA benefits from the economic stability afforded by state government offices, Michigan State University, Sparrow Health Systems, and several medical and law schools. The area's major industries are government, education, insurance, healthcare, and automobile manufacturing. General Motors has offices and a hi-tech manufacturing facility in Lansing. The area also is headquarters to four major national insurance companies: Auto-Owners Insurance Company, Jackson National Life, the Accident Fund, and Michigan Millers Insurance Company. The state government is the most significant employer, and healthcare accounts for the largest share of the services sector. A majority of the businesses in the AA are small. According to 2016 Dun & Bradstreet data, 79.4 percent of the businesses located in the AA have less than \$1 million in gross annual revenues, and 69.3 percent of the businesses have fewer than five employees.

FNBA has better opportunities for both business and mortgage lending in the middle- and upper-income CTs within this AA. Over 81 percent of the owner-occupied housing units in the AA are in middle- and upper-income CTs. Conversely, the greatest percentages of rental and vacant housing are in low- and moderate-income CTs. Furthermore, 15.1 percent of the AA's households are considered to be living below the poverty level. This creates a barrier to home ownership, making it especially difficult for this segment of the low-income population to afford and maintain a home. Sixty-nine (69) percent of the AA's businesses, regardless of revenue level, are also located in middle- and upper-income CTs.

A highly competitive banking environment exists within this AA, with a mix of banks, credit unions and other finance companies serving the AA. Aggregate HMDA data reflects that 323 lenders originated home mortgage loans in the AA during 2016. FNBA ranked 63rd, with less than a one percent market share. The top five home loan lenders in the AA held a combined 39.2 percent of the market. According to June 30, 2016, FDIC deposit data, there were 22 insured depository institutions operating 118 offices in the Lansing-East Lansing MSA. FNBA ranked third in deposits, with a 10.3 percent market share. However, the bank has a significant level of brokered deposits that are not considered local deposits. When the bank's brokered deposits are excluded, it ranked eighth in deposits with a 4.9 percent market share. The largest deposit competitors are Fifth Third Bank and PNC Bank, which each have deposit market shares exceeding 12 percent. Other large financial institutions that have a deposit and lending presence in the market include Comerica Bank, Bank of America, and J.P. Morgan Chase Bank.

The Michigan and local economies improved during the evaluation period, with declining unemployment rates reflected across the region. According to Moody's Analytics, the economy is highly dependent on the auto industry, which provides 40% of the factory jobs. Housing prices remain undervalued compared to pre-recession levels. According to the U.S. Department of Labor's Bureau of Labor Statistics database, the unadjusted average annual unemployment rate for the Lansing-East Lansing MSA declined from 5.9 percent in 2014, to 4.2 percent as of December 31, 2016. The state-wide unemployment rate also declined from 7.2 percent in 2014, to 5.0 percent in 2016.

Opportunities to make CD loans and qualified investments, as well as to provide CD services, exist within the AA. However, there is significant competition for involvement in these CD activities, as a large number of financial institutions operate in the AA. We considered information obtained from the bank and community organizations within the AA as part of our evaluation. During our review, we met with two organizations, including one with a focus on affordable housing and one that focuses on financial education and housing assistance. The organizations communicated that CD and credit needs of the AA included affordable single-family housing units, rehabilitation of existing homes, and neighborhood revitalization. Opportunities are available to invest in a loan fund targeted for building homes for the low- and moderate-income community, or provide funding for homebuyer and home ownership counseling and financial coaching programs, and local community organizations need funds or grants for computer and system upgrades and general operating support. Many young adults in the community also do not have bank accounts, or they financially are not financially literate, so there are opportunities to open non-custodial youth accounts and affordable checking accounts for this demographic. Finally, offering small-dollar consumer loan products would provide an alternative to payday lending.

Grand Rapids-Wyoming, MI MSA

Demographic Information for Full-Scope Area: Grand Rapids – Wyoming, MI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	128	9.38	23.44	42.97	24.22	0.00
Population by Geography	602,622	6.80	20.77	42.13	30.29	0.00
Owner-Occupied Housing by Geography	161,947	3.45	16.74	45.62	34.18	0.00
Businesses by Geography	33,800	6.44	18.83	39.40	35.34	0.00
Farms by Geography	989	1.31	7.48	46.61	44.59	0.00
Family Distribution by Income Level	152,710	21.20	17.60	21.34	39.86	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	59,251	11.26	30.00	42.19	16.55	0.00
Median Family Income	= \$ 61,182					
HUD Adjusted Median Family Income for 2016	= \$ 65,800					
Households Below the Poverty Level	= 12.83%					
				Median Housing Value	= \$ 153,036	
				Unemployment Rate	= 3.5%	

(*) The NA category consists of geographies that have not been assigned an income classification. Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The Grand Rapids AA consists of the Kent County portion of the Grand Rapids-Wyoming, Michigan MSA. The AA is located in the southwestern part of Michigan's Lower Peninsula. The area offers a combination of both urban and suburban neighborhoods, as well as rural areas. Grand Rapids is the primary city within the AA, and contains most of the AA's low- and moderate-income CTs. It is also the second largest city in Michigan. Wyoming and Kentwood are the other two focal points of the AA. The AA is comprised of contiguous geographies, and does not arbitrarily exclude any low- or moderate-income areas. Based on 2010 US Census

data, the bank's AA consists of 128 CTs, including 12 low-income, 30 moderate-income, 55 middle-income, and 31 upper-income CTs.

According to 2010 U.S. Census data, the AA contains approximately 6.1 percent of the state's population. The population of the AA equated to 602,622 persons and 152,710 families. In addition, there were 161,947 owner-occupied households. The percentage of families in each income level within the AA are identified in the table above. In aggregate, 59,251 families in the AA are designated low- or moderate-income. Demographic data also indicates that 12.8 percent of households live below the poverty level, and 28.7 percent of the number of households derive income from social security or public assistance.

A majority of businesses in the AA are small. According to 2016 Dun & Bradstreet data, 77.8 percent of the businesses located in the AA have less than \$1 million in gross annual revenues, and 81.4 percent of the businesses have fewer than five employees. Michigan Economic Development Corporation data from 2016 reflected that top industries for jobs in the area include manufacturing, education and health services, professional and business services, and government. According to Moody Analytics, the area's largest employers are Spectrum Health, Meijer Inc., Amway, and Mercy Health Systems.

FNBA has better opportunities for both business and mortgage lending in the middle- and upper-income CTs within this AA as well. Eighty (80) percent of the owner-occupied housing units in the AA are located in middle- and upper-income CTs. Conversely, the greatest percentages of rental and vacant housing are in low- and moderate-income CTs. Furthermore, almost 13 percent of households in the AA are considered to be living below the poverty level, which makes it particularly challenging for this segment of the population to afford and maintain a home. Seventy-four (74) percent of the AA's businesses are also located in middle- and upper-income CTs.

Competition is strong within the banking and lending markets in the AA. According to June 30, 2016, FDIC deposit data, there were 24 insured depository institutions operating 185 offices in the Kent County portion of the Grand Rapids-Wyoming AA. FNBA ranked 18th in deposits, with a 0.4 percent market share. Fifth Third Bank, Wells Fargo, Huntington, and JP Morgan Chase Bank are the top four institutions in deposit market share, with almost 60 percent of the AA's total deposits. Aggregate HMDA data reflects that 357 lenders originated home mortgage loans in the AA during 2016. FNBA ranked 122nd, with .05 percent market share. The top five home loan lenders in the AA held a combined 36.1 percent market share. Other large financial institutions that have a deposit and lending presence in the AA are Mercantile Bank of Michigan, Bank of America, and Chemical Bank.

The Michigan and local economies improved during the evaluation period, with declining unemployment rates reflected across the region. Moody Analytics noted the local economy has rebounded, and added jobs as well as new residents faster than any other metropolitan area in the state. Housing values are approaching pre-recessional levels. According to the U.S. Department of Labor's Bureau of Labor Statistics database, the unadjusted average annual unemployment rate for the Grand Rapids AA declined from 4.9 percent in 2014, to 3.5 percent as of December 31, 2016. This compares very favorably to the state-wide unemployment rate of 5.0 percent.

Opportunities exist to originate/purchase CD loans, make qualified investments, and provide

CD services within the area. However, the competition for involvement in larger projects is strong, as a considerable number of financial institutions operate in this growing AA. Our evaluation took into consideration information derived from the bank as well as members of the community. We contacted one community development organization that focuses on creating quality affordable housing, providing essential support services, and serving as a catalyst for neighborhood revitalization. Credit and CD needs identified within the AA include affordable single-family and multifamily housing units, neighborhood revitalization, and commercial redevelopment. Assistance from financial institutions include providing construction and permanent financing mortgages for local housing initiatives to revitalize neighborhoods, rehabilitation loans, and small business financing for start-up companies are also needed. Opportunities exist to participate in a local business program through mentorship and counseling, or making referrals to their business incubator. There are additional funding needs to support existing programs offering home ownership counseling and financial literacy programs.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 7. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

Table 10. Borrower Distribution of Refinance Loans - See Table 8.

Table 11. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income

geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: FNB OF AMERICA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:													
FNBA Grand Rapids MSA AA	18.75	32	10,126	9	5,729	1	15	0	0	41	15,855	17.12	
FNBA Lansing MSA AA	66.52	80	19,076	56	12,018	1	258	12	7,079	136	31,094	63.65	
Limited Review:													
FNBA Traverse City Non-MSA AA	14.73	4	421	29	2,509	0	0	0	0	33	2,930	19.23	

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 07, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: FNB OF AMERICA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area (2016):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
FNBA Grand Rapids MSA AA	0	0	12	5,353	
FNBA Lansing MSA AA	0	0	48	17,719	
Limited Review:					
FNBA Traverse City Non-MSA AA	0	0	4	203	

* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: FNB OF AMERICA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNBA Grand Rapids MSA AA	21	36.84	3.45	4.76	16.74	23.81	45.62	23.81	34.18	47.62	0.07	0.21	0.16	0.00	0.11
FNBA Lansing MSA AA	34	59.65	3.56	5.88	15.04	11.76	52.89	41.18	28.50	41.18	0.21	1.49	0.22	0.15	0.22
Limited Review:															
FNBA Traverse City Non-MSA AA	2	3.51	0.00	0.00	6.02	0.00	39.88	100.00	54.10	0.00	0.07	0.00	0.00	0.15	0.00

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: FNB OF AMERICA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
FNBA Grand Rapids MSA AA	3	37.50	3.45	33.33	16.74	0.00	45.62	0.00	34.18	66.67	0.12	2.63	0.00	0.00	0.14
FNBA Lansing MSA AA	4	50.00	3.56	0.00	15.04	25.00	52.89	75.00	28.50	0.00	0.10	0.00	0.36	0.09	0.00
Limited Review:															
FNBA Traverse City Non-MSA AA	1	12.50	0.00	0.00	6.02	0.00	39.88	100.00	54.10	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2016 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FNB OF AMERICA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
FNBA Grand Rapids MSA AA	5	15.15	3.45	0.00	16.74	20.00	45.62	40.00	34.18	40.00	0.00	0.00	0.00	0.00	0.00
FNBA Lansing MSA AA	27	81.82	3.56	0.00	15.04	18.52	52.89	51.85	28.50	29.63	0.06	0.00	0.22	0.07	0.00
Limited Review:															
FNBA Traverse City Non-MSA AA	1	3.03	0.00	0.00	6.02	0.00	39.88	0.00	54.10	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2016 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: FNB OF AMERICA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
FNBA Grand Rapids MSA AA	3	16.67	7.00	33.33	33.46	0.00	47.83	33.33	11.71	33.33	3.64	0.00	0.00	5.56	16.67	
FNBA Lansing MSA AA	15	83.33	7.92	13.33	29.73	40.00	42.79	33.33	19.56	13.33	10.59	20.00	10.71	11.76	5.56	
Limited Review:																
FNBA Traverse City Non-MSA AA	0	0.00	0.00	0.00	34.18	0.00	28.52	0.00	37.30	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: FNB OF AMERICA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
FNBA Grand Rapids MSA AA	9	9.57	6.44	0.00	18.83	33.33	39.40	44.45	35.34	22.22	0.03	0.00	0.09	0.02	0.02			
FNBA Lansing MSA AA	56	59.58	3.81	14.29	24.18	39.29	41.97	30.36	27.81	14.29	0.34	0.68	0.56	0.38	0.11			
Limited Review:																		
FNBA Traverse City Non-MSA AA	29	30.85	0.00	0.00	12.55	34.48	42.87	34.48	44.59	31.03	0.26	0.00	0.32	0.29	0.20			

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: FNB OF AMERICA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
FNBA Grand Rapids MSA AA	1	50.00	1.31	0.00	7.48	0.00	46.61	100.00	44.59	0.00	0.89	0.00	0.00	1.47	0.00
FNBA Lansing MSA AA	1	50.00	1.58	0.00	6.31	0.00	65.99	100.00	25.53	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
FNBA Traverse City Non-MSA AA	0	0.00	0.00	0.00	4.88	0.00	44.82	0.00	50.30	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FNB OF AMERICA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ¹	% BANK Loans [*]	% Families ^{***}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{**}	Overall	Low	Mod	Mid	Upp
Full Review:															
FNBA Grand Rapids MSA AA	21	36.84	21.20	16.67	17.60	22.22	21.34	27.78	39.86	33.33	0.08	0.23	0.03	0.10	0.07
FNBA Lansing MSA AA	34	59.65	20.56	6.90	17.77	34.48	21.91	27.59	39.77	31.03	0.19	0.15	0.41	0.17	0.04
Limited Review:															
FNBA Traverse City Non-MSA AA	2	3.51	11.74	50.00	17.21	0.00	21.05	0.00	49.99	50.00	0.08	0.00	0.00	0.00	0.13

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 14.0% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FNB OF AMERICA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ⁶				
	#	% of Total ^{**}	% Families [*] ..	% BANK Loans ^{***} .	% Families ²	% BANK Loans ^{***} *	% Families ^{***}	% BANK Loans ^{***} *	% Families ^{***}	% BANK Loans ^{***} *	Overall	Low	Mod	Mid	Upp
Full Review:															
FNBA Grand Rapids MSA AA	3	37.50	21.20	0.00	17.60	100.00	21.34	0.00	39.86	0.00	0.00	0.00	0.00	0.00	0.00
FNBA Lansing MSA AA	4	50.00	20.56	100.00	17.77	0.00	21.91	0.00	39.77	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
FNBA Traverse City Non-MSA AA	1	12.50	11.74	0.00	17.21	0.00	21.05	0.00	49.99	100.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 62.5% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: FNB OF AMERICA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans [*] ***						
Full Review:																
FNBA Grand Rapids MSA AA	5	15.15	21.20	33.33	17.60	33.33	21.34	33.33	39.86	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Lansing MSA AA	27	81.82	20.56	7.69	17.77	11.54	21.91	23.08	39.77	57.69	0.05	0.00	0.00	0.17	0.00	
Limited Review:																
FNBA Traverse City Non-MSA AA	1	3.03	11.74	0.00	17.21	0.00	21.05	100.00	49.99	0.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 9.1% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: FNB OF AMERICA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FNBA Grand Rapids MSA AA	9	9.57	77.69	77.78	0.00	11.11	88.89	0.03	0.04
FNBA Lansing MSA AA	56	59.58	78.76	66.07	41.07	39.29	19.64	0.34	0.39
Limited Review:									
FNBA Traverse City Non-MSA AA	29	30.85	81.33	41.38	72.41	20.69	6.90	0.26	0.29

^{*} Based on 2016 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: FNB OF AMERICA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
FNBA Grand Rapids MSA AA	1	50.00	93.33	100.00	100.00	0.00	0.00	0.89	1.79
FNBA Lansing MSA AA	1	50.00	96.47	100.00	0.00	100.00	0.00	0.00	0.00
Limited Review:									
FNBA Traverse City Non-MSA AA	0	0.00	96.34	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2016 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FNB OF AMERICA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FNBA Grand Rapids MSA AA	0	0	19	1,607	19	1,607	65.46	0	0
FNBA Lansing MSA AA	0	0	15	577	15	577	23.50	0	0
Limited Review:									
FNBA Traverse City Non-MSA AA	0	0	11	271	11	271	11.04	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: FNB OF AMERICA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
FNBA Grand Rapids MSA AA	17.12	1	33.33	0.00	0.00	100.0	0.00	0	0	0	0	0	0	6.80	20.77	42.13	30.29							
FNBA Lansing MSA AA	63.65	1	33.33	0.00	0.00	0.00	100.0	0	0	0	0	0	0	5.23	19.33	47.52	24.26							
Limited Review:																								
FNBA Traverse City Non-MSA AA	19.23	1	33.33	0.00	0.00	0.00	100.0	0	0	0	0	0	0	0.00	8.21	43.64	48.15							