

PUBLIC DISCLOSURE

August 11, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Byron Bank
RSSD #945941

2445 84th Street SW
Byron Center, Michigan 49315

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604

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, 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'S RATING

INSTITUTION'S CRA RATING: Satisfactory

The following table indicates the performance level of Byron Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>BYRON BANK</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve		X	
Substantial Noncompliance			

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

Summary of Major Factors Supporting Rating

Lending Test

- The bank periodically ascertains the credit needs in its assessment area. The bank's lending patterns and product array reflect good responsiveness in addressing those credit needs;
- The bank originated a substantial majority of HMDA-reportable and CRA loans (91.3%) within the combined assessment area;

- The bank's geographic distribution of its HMDA-reportable and CRA loans reflects adequate penetration throughout the assessment areas;
- The bank's distribution of loans by borrower income and to businesses of different sizes reflects excellent penetration in the Holland MSA and Allegan County;
- The bank originated an adequate number of community development loans in the Grand Rapids MSA; and
- The bank's use of innovative and/or flexible lending practices in serving assessment area credit needs is limited.

Investment Test

- The bank's level of qualified investments is poor; however, it represents an improvement since the previous evaluation. A total of \$1,045,890 in qualified investment activities was noted.

Service Test

- The bank's products and services are considered reasonably accessible to all portions of the assessment area through its branch and ATM networks, mobile banking fleet, and website.
- Bank staff participates in various organizations that provide services to individuals with low- and moderate-incomes.

INSTITUTION

DESCRIPTION OF INSTITUTION

Byron Bank, Byron Center, Michigan with total assets \$762.1 million as of March 31, 2008 is a wholly-owned subsidiary of OAK Financial Corporation. The bank, which operates through 14 full-service branches, provides banking and financial services to individuals, small- and mid-sized businesses, local governmental units, and institutional clients located in the bank's combined assessment area. These services include traditional deposit products, such as demand, savings, money market, and time deposit accounts; and loan products, such as home equity lines-of-credit, home mortgages, consumer loans, and commercial loans. The bank also offers other services, such as safe deposit access, tailored to meet the needs of customers.

The bank is primarily a commercial lender, with a concentration in non-farm non-residential real estate. Based on the bank's Consolidated Report of Condition dated March 31, 2008, the bank reported total loans of \$607.5 million, including non-farm nonresidential real estate representing 40.7% of the loan portfolio, commercial and industrial loans (19.1%), and 1-4 family residential loans (10.8%). Additionally, as of June 30, 2007, Byron Bank had a 3.7% market share of total deposits of all banks in the bank's combined assessment area.

It should be noted that an economic downturn, spurred by the restructuring of the automobile industry within the state of Michigan has impacted lending opportunities in varying degrees in the bank's three assessment areas. Based on U. S. Census data as of June 30, 2008, the unemployment rates in the Grand Rapids, Holland, and Michigan Non Metropolitan MSAs (6.4%, 6.4%, and 6.9% not seasonally adjusted) respectively are lower than the unemployment rate for the state of Michigan (7.9%). However, all of these rates are significantly higher than the unemployment rate for the United States at 5.2% as of June 30, 2008. In addition, the continuing weak economic conditions coupled with a significant decline in real estate values in many parts of the state, including portions of the bank's assessment areas, has impacted employment, and contributed to increasing bankruptcy and home foreclosure rates within local markets.

DESCRIPTION OF ASSESSMENT AREA

The bank has not made any changes to its assessment areas since the previous examination. The bank's combined assessment area, shown in Appendix A, has three designated individual assessment areas including Kent County, Ottawa County, and Allegan County. Kent County is one of four counties that comprise the Grand Rapids-Wyoming MSA (hereinafter referred to as the Grand Rapids MSA); Ottawa County is also known as the Holland-Grand Haven MSA (Holland MSA); and Allegan County is part of the non-metropolitan area of the state of

Michigan. The largest of the bank's three assessment areas is the Grand Rapids MSA, which includes 126 census tracts, of the 181 census tracts in the combined assessment area. The following exhibit illustrates Byron Bank's combined assessment area demographics based on 2000 U.S. Census Bureau and Dun & Bradstreet data.

Exhibit 1								
Assessment Area Demographics Combined Assessment Area								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	2.8	3,081	1.3	936	30.4	37,211	15.8
Moderate-income	29	16.0	27,214	11.5	4,047	14.9	42,632	18.1
Middle-income	108	59.7	152,306	64.6	6,236	4.1	60,065	25.5
Upper-income	39	21.5	53,254	22.6	1,287	2.4	95,947	40.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	181	100.0	235,855	100.0	12,506	5.3	235,855	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	5,147	1,807	0.7	35.1	2,691	52.3	650	12.6
Moderate-income	47,848	23,642	9.6	49.4	20,785	43.4	3,421	7.1
Middle-income	230,905	163,044	65.9	70.6	54,194	23.5	13,667	5.9
Upper-income	70,247	58,823	23.8	83.7	7,731	11.0	3,693	5.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	354,148	247,316	100.0	69.8	85,401	18.1	5,194	6.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	607	1.7	461	1.4	132	3.3	14	1.9
Moderate-income	4,761	12.9	4,101	12.8	563	14.3	97	13.4
Middle-income	22,237	60.5	19,537	60.9	2,251	57.1	449	62.0
Upper-income	9,160	24.9	8,001	24.9	995	25.2	164	22.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	36,765	100.0	32,100	100.0	3,941	100.0	724	100.0
	Percentage of Total Businesses:			87.3		10.7		2.0
Note: Information regarding businesses is based on 2005 Dun & Bradstreet information; all other information is based on 2000 U.S. Census Bureau data								

SCOPE OF EXAMINATION

Based on asset size, and under the provisions of the CRA, Byron Bank is considered an intermediate small bank; however, bank management elected to be evaluated under the large bank criteria. Accordingly, performance within the three designated assessment areas was evaluated based on the following performance standards.

- ***Lending Test***

- ***Lending Activity*** – The volume of HMDA-reportable loans and CRA-reportable small loans to businesses (hereinafter referred to as CRA loans) originated from January 1, 2006 to December 31, 2007, was reviewed to determine responsiveness to assessment area credit needs.

The bank also collected and reported CRA-reportable small farm loans during the two-year period; however, the volume of small farm lending as a percentage of overall CRA reportable lending at approximately 2.7 percent is minimal. As noted above, the bank's strategic focus is primarily commercial lending. Consequently, small farm lending was not included in assessing the bank's performance under the Lending Test.

- ***Assessment Area Concentration*** – The bank's HMDA-reportable loans and CRA loans originated from January 1, 2006 to December 31, 2007, were reviewed to determine the percentage of loans originated in the combined assessment areas.
- ***Geographic Distribution of Lending in the Assessment Area*** – The bank's HMDA-reportable loans and CRA loans originated within the assessment areas, from January 1, 2006 to December 31, 2007, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate-income.
- ***Borrower Distribution of Lending in the Assessment Area*** – The bank's HMDA-reportable loans and CRA loans to businesses originated within the assessment areas, from January 1, 2006 to December 31, 2007 were also reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses with different revenue levels.
- ***Community Development Lending*** – The volume and complexity of community development loans originated from July 11, 2006 to June 30, 2008, within the assessment areas were reviewed.

- *Innovative or Flexible Lending Practices* – The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals or geographies was assessed.
- *Investment Test* – Qualified investments made from July 11, 2006 to June 30, 2008 were reviewed and evaluated to determine the bank’s use of innovative or complex investments, as well as the bank’s responsiveness to credit and community development needs within the assessment areas.
- *Service Test* – The distribution of the branch offices, banking services, hours of operation, availability of loan and deposit products and the extent and degree of innovation of community development services were reviewed.
- *Response to Substantiated Complaints* – Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous examination.

In addition to the above criteria, information obtained through discussions with five community representatives was considered in the overall evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Byron Bank’s performance was evaluated in the context of information about the institution, such as asset size, financial condition, and competition, as well as economic and demographic characteristics of each of the three assessment areas.

The overall CRA rating is primarily supported by the bank’s performance under the lending and service tests. While performance under the investment test is less than satisfactory, it is noted that the number and dollar volume has increased since the prior evaluation. Detailed information on the bank’s performance for the tests is discussed under each of the assessment area sections. The facts and data considered in evaluating the lending performance in 2007 may also be found in the Core Tables in Appendix D.

LENDING TEST

Byron Bank’s performance is satisfactory.

Lending Activity

Lending levels reflect good responsiveness to the combined assessment area credit needs. The

bank originated a total of 1,059 HMDA-reportable loans for the 2006 and 2007 reporting years. This is a decrease from 1,292 HMDA-reportable loans for the 2004 and 2005 reporting years. The decline in originations is a direct result of the decrease in the refinancing business experienced in the real estate lending industry, but also reflects the bank's emphasis on risk aversion and loan quality. Refinanced loan activity decreased substantially; however, the decrease is consistent with the industry trend. The number of home purchase loans, alternatively, has remained stable primarily due to an increase in the number of loan mortgage originators recently hired.

The bank's small business loan originations have increased 124.9 percent since the previous evaluation to 713 CRA loans. The increase is attributed to a continuing shift in the bank's focus to commercial lending, coupled with the hiring of several experienced commercial lenders. The table below illustrates the bank's lending for the current period.

Exhibit 2				
Byron Bank				
Summary of Lending Activity				
January 1, 2006 – December 31, 2007				
Loan Type	#	%	\$ (000s)	%
Home Purchase	493	-	70,330	-
Home Improvement	89	-	2,483	-
Multi-Family Housing	1	-	1,400	-
Refinancing	476	-	60,532	-
Total HMDA-reportable	1,059	59.8	134,745	54.9
CRA-reportable Small Business	713	40.2	110,890	45.1
Total Loans	1,772	100.0	245,635	100.0

Assessment Area Concentration

A substantial majority of the bank's loans were originated within the combined assessment area. During the evaluation period, the bank originated 91.3 percent of its combined HMDA-reportable loans and CRA loans within the assessment area. The following table illustrates concentration by loan type.

Exhibit 3								
Byron Bank								
Combined Assessment Area Concentration								
January 1, 2006 – December 31, 2007								
	Inside				Outside			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Purchase	430	87.2	60,161	85.5	63	12.8	10,169	14.5
Home Improvement	82	92.1	2,282	91.9	7	7.9	201	8.1
Multi-Family Housing	1	100.0	1,400	100.0	0	0.0	0.0	0.0
Refinancing	438	92.0	51,293	84.7	38	8.0	9,239	15.3
Total HMDA-reportable	951	89.8	115,136	85.4	108	10.2	19,609	14.6
Total CRA-reportable small business	666	93.4	101,017	91.1	47	6.6	9,873	8.9
Total Loans	1,617	91.3	216,153	88.0	155	8.7	29,482	12.0

Geographic Distribution of Loans

The geographic distribution of loans reflects adequate penetration throughout the combined assessment area. The exhibit below illustrates the bank's lending distribution by census tract income.

Exhibit 4				
Byron Bank				
Loan Distribution By Tract Income – Combined Assessment Area				
January 1, 2006 – December 31, 2007				
HMDA-Reportable				
Income Categories	#	%	\$ (000s)	%
Low	4	0.4	266	0.2
Moderate	32	3.4	3,609	3.1
Middle	514	54.1	58,346	50.7
Upper	401	42.1	52,915	46.0
Total HMDA-Reportable	951	100.0	115,136	100.0
CRA-Reportable				
Income Categories	#	%	\$	%
Low	7	1.1	661	0.7
Moderate	48	7.2	4,478	4.4
Middle	357	53.6	55,154	54.6
Upper	254	38.1	40,724	40.3
Total CRA Reportable	666	100.0	101,017	100.0

As depicted in Exhibit 4, approximately 3.8 and 8.3 percent of the bank’s HMDA-reportable and CRA loans, respectively, originated during the evaluation period are located within low- and moderate-income census tracts. In contrast, aggregate data for all lenders reflects that 12.4 percent of their HMDA-reportable loans and 12.1 percent of their CRA loans during the two-year period were originated to borrowers in low- or moderate-income census tracts within the combined assessment area. Exhibit 1 reflects that although the bank’s penetration of low- and moderate-income tracts is below aggregate, it is generally in line with the number of low- and moderate-income families at 1.3 and 11.5 percent respectively. The bank’s penetration level is also commensurate with the number of low- and moderate income census tracts in the assessment area at 2.8 and 16.0 percent, respectively. Analysis of the bank’s performance by assessment area below provides additional information and context regarding the impact of environmental factors.

Borrower Distribution of Loans

The bank’s distribution of HMDA- and CRA loans reflects excellent penetration among borrowers of different income levels and businesses of different sizes. The following exhibits illustrate this fact.

Exhibit 5 Byron Bank HMDA-Reportable Loan Distribution – Combined Assessment Area By Borrower Income January 1, 2006 – December 31, 2007				
Income Categories	#	%	\$ (000s)	%
Low	79	8.3	5,464	4.8
Moderate	245	25.7	21,867	19.0
Middle	251	26.4	25,913	22.5
Upper	341	35.9	54,847	47.6
Unknown	35	3.7	7,045	6.1
Total	951	100.0	115,136	100.0

Exhibit 5 shows that the bank originated 34.0 percent of HMDA-reportable loans during the evaluation period to low- and moderate-income borrowers. Consequently, the bank’s performance is consistent with the percentage of low- and moderate-income families in the assessment area, which represent 33.9 percent of all families as depicted in Exhibit 1. Furthermore, the bank also exceeded aggregate performance of 30.1 percent of 2006 and 2007 HMDA-reportable loans to borrowers in low- or moderate-income census tracts. Byron Bank’s lending to low- and moderate-income borrowers is also considered significant considering that 5.3 percent of the families in the assessment area are below the poverty level.

Exhibit 6				
Byron Bank				
CRA-Reportable Loan Distribution – Combined Assessment Area				
by Business Revenue and/or Loan Size				
January 1, 2006 – December 31, 2007				
By Revenue	#	%	\$ (000s)	%
Total \$1 Million or Less	623	93.5	91,724	90.8
Over \$1 Million	0	0.0	0	0.0
Not Known	43	6.5	9,293	9.2
Total	666	100.0	101,017	100.0
By Loan Size	#	%	\$ (000s)	%
\$100,000 or less	392	58.9	17,751	17.6
\$100,001-\$250,000	156	23.4	26,892	26.6
\$250,001-\$1 Million	118	17.7	56,374	55.8
Over \$1 Million	0	0.0	0	0.0
Total	666	100.0	101,017	100.0
By Loan Size and Revenue	#	%	\$ (000s)	%
\$1 Million or less				
\$100,000 or less	374	60.0	16,824	18.3
\$100,001-\$250,000	143	23.0	24,473	26.7
\$250,001-\$1 Million	106	17.0	50,427	55.0
Over \$1 Million	0	0.0	0	0.0
Total	623	100.0	91,724	100.0

The bank originated 93.5 percent of its small business loans to entities with revenues under \$1 million, which exceeds the 87.3 percent of all businesses with revenues of less than \$1 million located in the combined assessment area. Of the 623 loans originated to businesses with revenues of \$1 million or less, 374 or 60.0 percent were originated in amounts of \$100,000 or less, which indicates the bank is also originating a significant number of small loans to small businesses.

Community Development Lending

The bank originated an adequate level of community development loans in its combined assessment area. From July 11, 2006 to June 30, 2008, the bank originated six qualified community development loans totaling \$341,657. The purpose of the loans was to purchase or develop affordable housing.

Innovative or Flexible Lending Practices

The bank offers few innovative and/or flexible lending programs to serve its combined

assessment area credit needs. However, the bank participates in some special programs targeted to the credit needs of low- and moderate-income individuals or geographies through third party agencies, including the United States Department of Agriculture (USDA) and Michigan State Housing Development Authority (MSHDA).

INVESTMENT TEST

Although Byron Bank's performance relative to the investment test is considered poor, improvement was noted in the level of qualifying investments since the last evaluation. The bank invested \$1,045,890 in qualified activities, which included \$1,005,000 in municipal bond purchases, and \$40,890 in other qualified investments and donations. At the previous evaluation, the bank originated \$9,000 in qualified grants and donations. The bank also makes limited use of innovative and/or complex investments to support community development initiatives.

Bank management has continued to search for possible qualifying investment opportunities in both traditional and less traditional vehicles. For example, although management has actively searched for municipal bonds that foster community development and has invested in various municipal projects, few qualify under the regulatory definition of community development. Management has also researched mortgage-backed securities, but such securities have been deemed inconsistent with the bank's investment guidelines.

SERVICE TEST

Byron Bank's performance relative to the service test is adequate.

Retail Services

The bank's products and services are considered reasonably accessible through its branch and ATM networks to all portions of its combined assessment area. The bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly for low- and moderate- income geographies or individuals. The bank has opened one branch since the previous evaluation, located in an upper-income geography. In addition, business hours and services do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies.

Community Development Services

The bank provides an adequate level of community development services throughout its combined assessment area. Bank staff participates in various organizations that provide services to individuals with low- and moderate-incomes. In addition, bank officers participate

in the West Michigan CRA Association, which assists in the identification of the credit needs of the communities served by its members, and actively promotes efforts to meet those needs.

COMPLIANCE WITH ANTIDISCRIMINATION LAWS

Byron Bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations, including the Equal Credit Opportunity and Fair Housing Acts. A sample of the banks' lending activity was reviewed to determine whether loan policies and lending standards are in compliance with fair lending laws and regulations, and are consistently applied to all applicants. No evidence of prohibited discriminatory or other illegal credit practices was identified.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GRAND RAPIDS MSA

The assessment area includes 126 census tracts in Kent County and is served by the main office and four branches, all with full service ATMs, and three offsite cash-dispensing only ATMs. The bank is ranked 8th in deposit market share, with 3.1% of deposits, of the 26 FDIC-insured financial institutions with offices in the assessment area.

The population in the assessment area according to 2000 U.S. Census Bureau data is 574,335. However, based on 2006 U.S. Census Bureau estimates, the population in the assessment area increased 4.4 percent to 599,524 between 2000 and 2006. The largest city is Grand Rapids with a population 197,800. There are 145,276 families located within the assessment area, 17.1 percent and 18.0 percent of which are low- and moderate-income, respectively. Of the 24,872 families that are considered low-income, there are 9,172 families with incomes that fall below the poverty rate, representing 6.3 percent of all families. The median family income for the assessment area, as of 2000, is \$54,568. Based on HUD estimates, as of 2006, the median family income for the Grand Rapids MSA increased to \$61,500.

Based on 2000 U.S. Census Bureau data, there are 224,000 housing units in the Grand Rapids MSA, of which 66.8 percent are owner-occupied, 28.2 percent are rental units, and 5.0 percent are vacant. The median age of the housing stock for the assessment area is 33 years, and the median housing value is \$111,647. Additionally, based on 2006 U.S. Census Bureau estimates, the median housing value have increased 33.2 percent to \$148,700.

Affordability ratios, developed by dividing the median family income by the median housing value for a given area, are helpful in comparing costs for different geographies. An area with a higher ratio generally has more affordable housing than an area with a lower ratio. Based on 2000 U.S. Census Bureau data, the affordability ratio for the assessment area of 0.49 is comparable with the state of Michigan, and the MSA at 0.48, and 0.49, respectively. However, based on 2006 HUD and Census Bureau estimates, the affordability ratios for the assessment area and Michigan were 0.41 and 0.34, respectively, which indicates housing has become less affordable. It should be noted, however, that affordability in the assessment area has not declined as quickly as in the state during the same period.

The unemployment rate for Kent County was 6.2 percent, compared to 7.9 percent for the state of Michigan, as of the second quarter of 2008. The largest employers in the assessment area are hospitals, grocery stores, and manufacturers including Meijer Companies, Ltd.; Spectrum Health System; Alticore, Inc.; and Steelcase, Inc.

The following exhibit provides assessment area demographics based on the 2000 U.S. Census

Bureau and Dun & Bradstreet data.

Exhibit 7								
Assessment Area Demographics Grand Rapids MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	4.0	3,081	2.1	936	30.4	24,872	17.1
Moderate-income	26	20.6	23,974	16.5	3,813	15.9	26,123	18.0
Middle-income	64	50.8	76,763	52.8	3,472	4.5	34,846	24.0
Upper-income	31	24.6	41,458	28.5	951	2.3	59,435	40.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	126	100.0	145,276	100.0	9,172	6.3	145,276	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	5,148	1,807	1.2	35.1	2,691	52.3	650	12.6
Moderate-income	42,581	20,564	13.7	48.3	18,940	44.5	3,077	7.2
Middle-income	121,872	81,566	54.5	66.9	35,314	29.0	4,992	4.1
Upper-income	54,399	45,782	30.6	84.2	6,226	11.4	2,391	4.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	224,000	149,719	100.0	66.8	63,171	28.2	11,110	5.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	607	2.6	461	2.3	132	4.9	14	3.0
Moderate-income	3,991	17.3	3,404	17.1	500	18.6	87	18.9
Middle-income	10,909	47.3	9,476	47.6	1,201	44.7	232	50.3
Upper-income	7,543	32.7	6,562	33.0	853	31.8	128	27.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	23,050	100.0	19,903	100.0	2,686	100.0	461	100.0
	Percentage of Total Businesses:			86.3		11.7		2.0
Note: Information regarding businesses is based on 2005 Dun & Bradstreet information; all other information is based on 2000 U.S. Census Bureau data								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GRAND RAPIDS MSA

Byron Bank's performance in the Grand Rapids MSA, the largest of the bank's assessment areas, significantly impacted its overall rating in all three tests, primarily because the bank originated a large percentage of its HMDA-reportable and CRA loans within this assessment area. In addition, all of the bank's community development lending, and a majority of its community development investments and services were focused in this assessment area.

LENDING TEST

Byron Bank's lending performance in the assessment area is satisfactory.

Lending Activity

The bank's lending levels reflect a good level of responsiveness to assessment area credit needs. A total of 460 HMDA-reportable loans were originated in the assessment area for the 2006 and 2007 reporting years. This is a decrease from 565 HMDA-reportable loans for the 2004 and 2005 reporting years. The number of home purchase loans has remained stable as a result of an increase in the number of loan mortgage originators. However, as noted previously, the decline in originations is a direct result of the decrease in the refinancing business experienced in the industry and the bank's emphasis on loan quality and risk aversion in a declining local economy. In addition, competition from larger lending organizations in the assessment area is significant.

Additionally, the focus on commercial lending and the increase in the unit's lending staff resulted in an increase of 147.7 percent in small business lending since the previous evaluation to 394 loans.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. The exhibit below illustrates the bank's lending distribution by census tract income.

Byron Bank Loan Distribution By Tract Income – Grand Rapids MSA January 1, 2006 – December 31, 2007				
HMDA-Reportable				
Income Categories	#	%	\$ (000s)	%
Low	4	0.9	266	0.4
Moderate	31	6.7	3,547	5.7
Middle	185	40.2	18,900	30.6
Upper	240	52.2	39,145	63.3
Total HMDA-Reportable	460	100.0	61,858	100.0
CRA-Reportable				
Income Categories	#	%	\$ (000s)	%
Low	7	1.8	661	1.0
Moderate	46	11.7	4,078	6.4
Middle	174	44.2	30,389	47.5
Upper	167	42.4	28,883	45.1
Total CRA Reportable	394	100.0	64,011	100.0

Owner-occupied housing in low- and moderate-income census tracts represents 14.9 percent of total housing in the bank’s assessment area (this statistic provides the potential level of demand for housing in a particular area). In addition, 19.4 percent of small businesses are located in low- and moderate-income tracts. Although only 7.6 and 13.5 percent of the bank’s HMDA-reportable and CRA loans are located within low- and moderate-income census tracts, this penetration level is reasonable given the percentage of low-and moderate-income families within the assessment area at 2.1 and 16.5, respectively. The performance of the aggregate of all lenders within the assessment area was 17.4 and 16.8 percent, respectively, for the two product categories. Additionally, the majority of low- and moderate-income census tracts are located within the city of Grand Rapids, and are not in close proximity to the institution’s branch offices located in towns south of the city. Competition is also intense with four, larger regional banking organizations each of which maintains a significant local presence.

Borrower Distribution of Loans

The bank’s distribution of lending in the Grand Rapids MSA, given the product lines offered, reflects good penetration among borrowers of different income levels and businesses of different sizes. The exhibits below illustrate this fact.

Byron Bank HMDA-Reportable Loan Distribution – Grand Rapids MSA By Borrower Income January 1, 2006 – December 31, 2007				
Income Categories	#	%	\$ (000s)	%
Low	36	7.8	2,527	4.1
Moderate	107	23.3	9,753	15.8
Middle	117	25.4	12,482	20.2
Upper	179	38.9	33,710	54.5
Unknown	21	4.6	3,386	5.5
Total	460	100.0	61,858	100.0

The bank originated 31.1 percent of HMDA-reportable loans during the evaluation period to low- and moderate-income borrowers, which is generally consistent with the percentage of low- and moderate-income families in the assessment area at 35.1 percent. In addition, the bank's performance exceeds the aggregate level of such lending at 30.0 percent for the two-year period. Furthermore, 5.3 percent of the families in the assessment area are below the poverty level, which limits lending opportunities.

Exhibit 10 Byron Bank CRA-Reportable Loan Distribution – Grand Rapids MSA by Business Revenue and/or Loan Size January 1, 2006 – December 31, 2007				
By Revenue	#	%	\$ (000s)	%
Total \$1 Million or Less	366	92.9	58,006	90.6
Over \$1 Million	0	0.0	0	0.0
Not Known	28	7.1	6,005	9.4
Total	394	100.0	64,011	100.0
By Loan Size	#	%	\$ (000s)	%
\$100,000 or less	226	57.4	10,436	16.3
\$100,001-\$250,000	90	22.8	15,330	23.9
\$250,001-\$1 Million	78	19.8	38,245	59.7
Over \$1 Million	0	0.0	0	0.0
Total	394	100.0	64,011	100.0
By Loan Size and Revenue \$1 Million or less	#	%	\$ (000s)	%
\$100,000 or less	213	58.2	9,677	16.7
\$100,001-\$250,000	84	23.0	14,181	24.4
\$250,001-\$1 Million	69	18.9	34,148	58.9
Over \$1 Million	0	0.0	0	0.0
Total	366	100.0	58,006	100.0

The bank originated 92.9 percent of its small business loans to entities with annual revenues of

\$1 million or less, which exceeds the 86.3 percent of all businesses with annual revenues of than \$1 million or less in the assessment area. Of the 366 loans originated to businesses with revenues of \$1 million or less, 213 or 58.2 percent were originated in amounts of \$100,000 or less, which indicates the bank is originating small loans to small businesses.

Community Development Lending

The bank's community development lending in the Grand Rapids MSA is considered adequate. A total of six qualified community development loans were originated amounting to \$341,657, all of which were used to purchase or develop affordable housing in the city of Grand Rapids.

INVESTMENT TEST

Byron Bank's investment performance in this assessment area is considered poor. The bank invested \$511,890 in community development qualified activities, including \$475,000 in municipal bond purchases and \$36,890 in other qualified investments and donations.

SERVICE TEST

Byron Bank's performance in the assessment area is satisfactory.

Retail Services

The branch and ATM networks are reasonably accessible to all geographies. The bank operates through its main office and four branches in the Grand Rapids MSA. The main office and one other branch are located in upper-income geographies, two branches are located in middle-income geographies, and one branch is located in a moderate-income geography. All five offices maintain full service ATMs. The branch office located in an upper-income geography was opened subsequent to the previous evaluation. Three offsite cash-dispensing only ATMs are also located within a shopping mall in an upper-income geography. In addition, the bank is able to reach remote areas through its mobile banking fleet. Businesses utilize the mobile banking fleet as a courier for deposits and other banking documents. Consumers can use the telephone banking system and the bank's website, allowing for transfers, deposit history, loan account information, and balance inquiries.

Community Development Services

The bank provides a relatively high level of community development services in the Grand Rapids MSA. During the evaluation period, bank staff participated in 18 different qualified events totaling 696 hours. These services were provided through employee and officer involvement, most notably in leadership capacities relating to affordable housing banking and

financial services for low- and moderate-income individuals.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOLLAND MSA

The Holland MSA includes 35 census tracts in Ottawa County. The assessment area is served by five branches with five full service ATMs. The bank ranks seventh, with a deposit market share of 3.8 percent, among the 18 FDIC-insured financial institutions with offices in this assessment area.

The population in the assessment area based on 2000 U.S. Census Bureau data is 238,314. Between 2000 and 2006, the population in the assessment area increased 8.1 percent to 257,671, based on 2006 U.S. Census Bureau estimates. There are 61,971 families located in the assessment area, 14.3 percent and 19.8 percent of which are low- and moderate-income, respectively. Of the 8,850 families that are considered low-income, 1,897 are families with incomes that fall below the poverty rate, representing 3.1 percent of all families. The median family income for the assessment area, as of 2000, is \$59,896. Based on HUD estimates, as of 2006, the median family income for the Holland MSA is 69,800.

Also, based on 2000 U.S. Census Bureau data, housing units in the Holland MSA total 86,856, of which 76.0 percent are owner-occupied. The median age of the housing stock is 25 years, while the median housing value in the assessment area is \$128,800. However, 2006 U.S. Census Bureau estimates reflect the median housing values have increased significantly by 28.3 percent to \$165,300.

The affordability ratio for the assessment area is consistent with that of the state of Michigan at 0.48. The more recent 2006 HUD and Census Bureau estimates reveal that the affordability ratios for the assessment area and the state were 0.42 and 0.34, respectively, which indicates that housing became less affordable in general throughout the state, but comparatively less so in the assessment area.

Based on data from the FDIC Regional Economic Conditions report, the unemployment rate for this assessment area was 6.4 percent, compared to 7.9 percent for the state, and 5.2 percent for the United States as of the second quarter 2008. The largest employers include manufacturers, shippers, and schools, such as Johnson Control Interiors, LLC; USF Holland; Inc.; Haworth International, Ltd.; and Grand Valley State University.

The following exhibit provides assessment area demographics based on the 2000 U.S. Census Bureau and 2005 Dun & Bradstreet data.

Exhibit 11								
Assessment Area Demographics Holland MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	8,850	14.3
Moderate-income	3	8.6	3,240	5.2	234	7.2	12,296	19.8
Middle-income	31	88.6	56,444	91.1	1,633	2.9	18,441	29.8
Upper-income	1	2.9	2,287	3.7	30	1.3	22,384	36.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35	100.0	61,971	100.0	1,897	3.1	61,971	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,267	3,078	4.7	58.4	1,845	35.0	344	6.5
Middle-income	78,256	60,339	91.5	77.1	13,602	17.4	4,315	5.5
Upper-income	3,333	2,551	3.9	76.5	247	7.4	535	16.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	86,856	65,968	100.0	76.0	15,694	18.1	5,194	6.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	770	8.2	697	8.4	63	6.8	10	6.5
Middle-income	8,403	89.3	7,411	89.0	854	92.2	138	89.6
Upper-income	237	2.5	222	2.7	9	1.0	6	3.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	9,410	100.0	8,330	100.0	926	100.0	154	100.0
	Percentage of Total Businesses:			88.5		9.8		1.6
Note: Information regarding businesses is based on 2005 Dun & Bradstreet information; all other information is based on 2000 U.S. Census Bureau data								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOLLAND MSA

Byron Bank's performance in the Holland MSA favorably impacted the bank's overall rating, especially the investment test rating since approximately half of the bank's community development investments were focused in this assessment area.

LENDING TEST

Byron Bank's lending performance in the assessment area is satisfactory.

Lending Activity

The bank's lending levels reflect a good level of responsiveness to assessment area credit needs. Originations totaled 274 HMDA-reportable loans for the 2006 and 2007 reporting years. This level represents a decrease from 384 HMDA-reportable loans for the 2004 and 2005 reporting years. The number of home purchase loans decreased only slightly. However, as noted previously, the decline in originations is a direct result of the decrease in the refinancing business experienced within the industry and the bank's emphasis on risk aversion and loan quality in a declining local economy.

For the reasons previously mentioned (i.e., increased strategic focus and increased staffing in the commercial lending area), the bank's small business lending level has increased by 70.0 percent since the previous evaluation period to 153 CRA loans.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate penetration throughout the Holland MSA. The exhibit below illustrates the bank's lending distribution by tract income.

Exhibit 12				
Byron Bank				
Loan Distribution By Tract Income – Holland MSA				
January 1, 2006 – December 31, 2007				
HMDA-Reportable				
Income Categories	#	%	\$ (000s)	%
Low	0	0.0	0	0.0
Moderate	1	0.4	62	0.2
Middle	273	99.6	33,724	99.8
Upper	0	0.0	0	0.0
Total HMDA-Reportable	274	100.0	33,786	100.0
CRA-Reportable				
Income Categories	#	%	\$ (000s)	%
Low	0	0.0	0	0.0
Moderate	2	1.3	400	1.9
Middle	151	98.7	20,434	98.1
Upper	0	0.0	0	0.0
Total CRA Reportable	153	100.0	20,834	100.0

Exhibit 11 reflects that owner-occupied housing in moderate-income census tracts represents 4.7 percent of total housing (there are no low-income census tracts in the assessment area). In addition, only 8.4 percent of small businesses are located in moderate-income tracts. Although 0.4 percent and 1.3 percent of the bank’s HMDA-reportable and CRA loans originated during the evaluation period, respectively, are located within moderate-income census tracts, penetration is reasonable compared with aggregate lending of all institutions within the assessment area at 5.9 percent and 6.1 percent for the two product categories. There are no low income census tracts in the bank’s assessment area. In addition, the moderate-income census tracts within the assessment area are located near the cities of Holland and Grand Haven and are not in close proximity to the institution’s branch offices, which are located in the southeast section of the county.

Borrower Distribution of Loans

The bank’s distribution of lending in the Holland MSA, given the product lines offered, reflects excellent penetration among borrowers of different income levels and businesses of different asset sizes. The exhibits below illustrate the bank’s lending distribution by borrower income, business size and loan amount.

Exhibit 13				
Byron Bank				
HMDA-Reportable Loan Distribution – Holland MSA				
By Borrower Income				
January 1, 2006 – December 31, 2007				
Income Categories	#	%	\$	%
Low	30	10.9	2,473	7.3
Moderate	92	33.6	8,903	26.4
Middle	72	26.3	8,280	24.5
Upper	70	25.5	11,218	33.2
Unknown	10	3.6	2,912	8.6
Total	274	100.0	33,786	100.0

As depicted in Exhibit 13 the bank originated 44.5 percent of HMDA-reportable loans during the evaluation period to low- and moderate-income borrowers, which exceeds the assessment area's percentage of low- and moderate-income families of 34.1 percent. In addition, this performance significantly surpasses the aggregate performance of all lenders within this assessment area with 35.1 percent of their 2006 and 2007 HMDA-reportable loans originated to borrowers in low- or moderate-income census tracts. Furthermore, it is noted that 3.1 percent of the families are below the poverty level, which further limits lending opportunities.

Exhibit 14				
Byron Bank				
CRA-Reportable Loan Distribution – Holland MSA				
by Business Revenue and/or Loan Size				
January 1, 2006 – December 31, 2007				
By Revenue	#	%	\$ (000s)	%
Total \$1 Million or Less	143	93.5	18,111	86.9
Not Known	10	6.5	2,723	13.1
Total	153	100.0	20,834	100.0
By Loan Size	#	%	\$ (000s)	%
\$100,000 or less	92	60.1	4,242	20.4
\$100,001-\$250,000	40	26.1	6,966	33.4
\$250,001-\$1 Million	21	13.7	9,626	46.2
Total	153	100.0	20,834	100.0
By Loan Size and Revenue \$1 Million or less	#	%	\$ (000s)	%
\$100,000 or less	89	62.2	4,154	22.9
\$100,001-\$250,000	36	25.2	6,181	34.1
\$250,001-\$1 Million	18	12.6	7,776	42.9
Total	143	100.0	18,111	100.0

The bank originated 93.5 percent of its small business loans to entities with revenues of \$1 million or less, which is consistent with the 93.6 percent of all businesses in this assessment area that had revenues of \$1 million or less. Of the 143 loans originated to businesses with revenues of \$1 million or less, 89 or 62.2 percent were originated in amounts of \$100,000 or less, which indicates the bank is lending to small businesses.

Community Development Lending

The bank did not originate any qualifying community development loans in the Holland MSA, reflecting poor performance within this assessment area.

INVESTMENT TEST

Byron Bank's investment performance in the Holland MSA is considered poor. The bank invested \$534,000 in qualified activities, of which \$530,000 was in municipal bond purchases, and the remaining \$4,000 was in other qualified investments and donations.

SERVICE TEST

Byron Bank's performance in the Holland MSA is considered less than satisfactory primarily due to its few community development service activities.

Retail Services

The branch and ATM network is reasonably accessible to all assessment area geographies. The bank operates five branches with five full service ATMs in the Holland MSA. All of the branches and ATMs are located in middle-income geographies. The bank is able to serve remote areas through its mobile banking fleet. In addition, consumers can use the telephone banking system and the bank's website for transactions such as transfers between accounts, deposit history, loan account information, and balance inquiries.

Community Development Services

The bank provides a limited level of community development services in the Holland MSA. During this evaluation period, bank staff participated in three qualified activities totaling 45 hours. These services are provided through employee and officer involvement and are related to economic development and banking and financial services for low- and moderate-income individuals.

NON-METROPOLITAN STATEWIDE AREA

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALLEGAN COUNTY

The assessment area includes 20 census tracts, and is served by four branches, all housing full service ATMs, and two offsite cash-dispensing ATMs. Byron Bank, at 12.0 percent of total deposits, is ranked fourth in deposit market share of the 11 FDIC-insured financial institutions with offices in the county.

The population in the assessment area according to 2000 U.S. Census Bureau data is 105,665. Between 2000 and 2006, the population in the assessment area increased 7.4 percent to 113,501, based on 2006 U.S. Census Bureau estimates. There are 28,608 families, 12.2 percent and 14.7 percent of which are low- and moderate-income, respectively. Of the 3,489 families that are considered low-income, there are 1,437 families with incomes that fall below the poverty rate, representing 5.0 percent of all families in the assessment area. The median family income for the assessment area, as of 2000, was \$51,908. However, HUD estimates as of 2006 reflect the median family income for Allegan County as \$51,200.

Based on 2000 U.S. Census Bureau data, a total of 43,292 housing units are located in Allegan County, of which 73.1 percent are owner-occupied, 15.1 percent are rental units, and 11.8 percent are vacant. The median age of the housing stock for the assessment area is 27 years, and the median housing value is \$111,300. The 2006 U.S. Census Bureau estimates indicate the median housing value has increased 34.5 percent to \$149,700.

The affordability ratios for the assessment area and the state of Michigan were 0.47 and 0.48, respectively, indicating that this assessment area is consistent with the state affordability trend.

As of the second quarter 2008, the unemployment rate for the assessment area is 6.9 percent, which exceeds the unemployment rate for the state of Michigan at 7.9 percent, and the United States at 5.2 percent. The largest employers in the assessment area are retailers and manufacturers.

The following exhibit provides assessment area demographics based on 2000 U.S. Census

Bureau and Dun & Bradstreet data.

Exhibit 15								
Assessment Area Demographics								
Allegan County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,489	12.2
Moderate-income	0	0.0	0	0.0	0	0.0	4,213	14.7
Middle-income	13	65.0	19,099	66.8	1,131	5.9	6,778	23.7
Upper-income	7	35.0	9,509	33.2	306	3.2	14,128	49.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	20	100.0	28,608	100.0	1,437	5.0	28,608	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	30,777	21,139	66.8	68.7	5,278	17.1	4,360	14.2
Upper-income	12,515	10,490	33.2	83.8	1,258	10.1	767	6.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	43,292	31,629	100.0	73.1	6,536	15.1	5,127	11.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	2,925	67.9	2,650	68.5	196	59.6	79	72.5
Upper-income	1,380	32.1	1,217	31.5	133	40.4	30	27.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,305	100.0	3,867	100.0	329	100.0	109	100.0
	Percentage of Total Businesses:			89.8		7.6		2.5
Note: Information regarding businesses is based on 2005 Dun & Bradstreet information; all other information is based on 2000 U.S. Census Bureau data								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALLEGAN COUNTY

Byron Bank's overall performance in the non-metropolitan area had only a moderate impact on the bank's overall rating.

LENDING TEST

Byron Bank's lending performance in the assessment area is satisfactory.

Lending Activity

The bank's lending reflects a good level of responsiveness to the assessment area's credit needs. Exhibit 16 reflects total of 217 HMDA-reportable loans were originated for the 2006 and 2007 reporting years. This is a decrease from 256 HMDA-reportable loans for the 2004 and 2005 reporting years. The number of home purchase and home refinance loans decreased from the previous evaluation period. These decreases are consistent with industry trends, and reflect the banks' emphasis on risk aversion and loan quality in a declining local economy.

The bank's small business lending increased 128.8 percent since the previous evaluation to 119 CRA small loans to businesses for the combined 2006 and 2007 reporting years compared with 52 CRA small loans to businesses for the combined 2004 and 2005 reporting years. This growth is attributed to the bank's increased commercial lending focus and additional commercial lending staff mentioned earlier.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate penetration throughout Allegan County. There are no low- or moderate-income census tracts in the assessment area; however, loans are reasonably dispersed as illustrated in the exhibit below.

Byron Bank Loan Distribution By Tract Income – Allegan County January 1, 2006 – December 31, 2007				
HMDA-Reportable				
Income Categories	#	%	\$ (000s)	%
Low	0	0.0	0	0.0
Moderate	0	0.0	0	0.0
Middle	56	25.8	5,722	29.4
Upper	161	74.2	13,770	70.6
Total HMDA-Reportable	217	100.0	19,492	100.0
CRA-Reportable				
Income Categories	#	%	\$ (000s)	%
Low	0	0.0	0	0.0
Moderate	0	0.0	0	0.0
Middle	32	26.9	4,331	26.8
Upper	87	73.1	11,841	73.2
Total CRA Reportable	119	100.0	16,172	100.0

Borrower Distribution of Loans

The bank's distribution of lending in Allegan County, given the product lines offered, reflects excellent penetration among borrowers of different income levels and businesses of different sizes. The exhibits below illustrate the bank's lending distribution by borrower income, business size, and loan amount.

Exhibit 17 Byron Bank HMDA-Reportable Loan Distribution – Allegan County By Borrower Income January 1, 2006 – December 31, 2007				
Income Categories	#	%	\$ (000s)	%
Low	13	6.0	464	2.4
Moderate	46	21.2	3,211	16.5
Middle	62	28.6	5,151	26.4
Upper	92	42.4	9,919	50.9
Unknown	4	1.8	747	3.8
Total	217	100.0	19,492	100.0

The bank originated 27.2 percent of HMDA-reportable loans during the evaluation period to low- and moderate-income borrowers, which is generally consistent with the percentage of all low- and moderate-income families with the assessment area at 26.9 percent. In addition, the bank's performance significantly exceeds the aggregate lending level at 20.1 percent of 2006 and

2007 HMDA-reportable loans that were originated to borrowers residing in low- or moderate-income census tracts. It is also noted that 5.0 percent of the families in the assessment area are below the poverty level, which limits lending opportunities.

Exhibit 18				
Byron Bank				
CRA-Reportable Loan Distribution – Allegan County				
by Business Revenue and/or Loan Size				
January 1, 2006 – December 31, 2007				
By Revenue	#	%	\$ (000s)	%
Total \$1 Million or Less	114	95.8	15,607	96.5
Not Known	5	4.2	565	3.5
Total	119	100.0	16,172	100.0
By Loan Size	#	%	\$ (000s)	%
\$100,000 or less	74	62.2	3,073	19.0
\$100,001-\$250,000	26	21.8	4,596	28.4
\$250,001-\$1 Million	19	16.0	8,503	52.6
Total	119	100.0	16,172	100.0
By Loan Size and Revenue \$1 Million or less	#	%	\$ (000s)	%
\$100,000 or less	72	63.2	2,993	19.2
\$100,001-\$250,000	23	20.2	4,111	26.3
\$250,001-\$1 Million	19	16.7	8,503	54.5
Total	114	100.0	15,607	100.0

Exhibit 18 shows the bank originated 95.8 percent of its small business loans to entities with revenues of \$1 million or less, which exceeds the 89.8 percent of all businesses of comparable size. Moreover, of the bank’s 114 loans originated to businesses with revenues of \$1 million or less, 72 or 63.2 percent were originated in amounts of \$100,000 or less, which indicates the bank is also originating small loans to small businesses.

Community Development Lending

The bank originated no community development loans in Allegan County, which constitutes poor community development lending in this assessment area. There are no low- or moderate-income tracts in this assessment area. Opportunities in middle- and upper-income tracts are substantially limited.

INVESTMENT TEST

Byron Bank made no qualified community development investments or grants in the assessment area and, consequently, its performance is considered poor.

SERVICE TEST

Byron Bank's performance is less than satisfactory in the service test primarily due to poor performance with respect to community development services.

Retail Services

The branch and ATM network is reasonably accessible to all geographies. The bank operates four branches, all with full service ATMs, and two cash dispensing-only ATMs in Allegan County. Three branches are located in upper-income geographies, and one branch is located in a middle-income geography. The bank is able to serve remote areas through its mobile banking fleet. Consumers can also use the telephone banking system and the bank's website for transfers between accounts, balance inquiries, and access to deposit history and loan account information.

Community Development Services

Bank management and staff participated in a limited number of community development services in Allegan County. During this evaluation period, bank staff was involved with three qualified activities totaling 61 hours, consisting of contributions related to economic development and banking and financial services for low- and moderate-income individuals.

APPENDIX A – SCOPE OF EXAMINATION

SCOPE OF EXAMINATION		
TIME PERIOD REVIEWED	January 1, 2006 to December 31, 2007	
FINANCIAL INSTITUTION	PRODUCTS REVIEWED	
Byron Bank Byron Center, Michigan	HMDA-Reportable Small Business	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
None	None	None

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION		
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED
MSA 24340 – Grand Rapids-Wyoming	Full-scope review	6455 Division Ave South, Grand Rapids, MI 6225 Kalamazoo Ave SE, Grand Rapids, MI
MSA 26100 – Holland-Grand Haven	Full-scope review	
Non-Metropolitan Michigan (Allegan County)	Full-scope review	

APPENDIX B – GLOSSARY

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the 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.

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

APPENDIX C – CORE TABLES

Table 1. Lending Volume

LENDING VOLUME State: MI Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007												
MA/Assessment Area	% 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:												
2007 Grand Rapids MSA	54.36	243	36,118	0	0	0	0	0	0	243	36,118	0.00
2007 Holland MSA	26.17	117	16,128	0	0	0	0	0	0	117	16,128	0.00
2007 Non-MSA Allegan County	19.46	87	10,516	0	0	0	0	0	0	87	10,516	0.00
Limited-Review:												

(*) The evaluation period for Community Development Loans is JANUARY 01, 2007 TO DECEMBER 31, 2007.

(**) Deposit data as of 2007. Rated area refers to either the state or multi-state MSA rating area.

(***) Loan data as of 2007. Rated area refers to either the state or multi-state MSA ratings area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														State: MI		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*								
	#	% of Total **	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full-Review:																			
2007 Grand Rapids MSA	151	63.45	1.21	0.00	13.74	9.93	54.48	41.72	30.58	48.34	1.73	14.96	49.15	34.17					
2007 Holland MSA	56	23.53	0.00	0.00	4.67	1.79	91.47	98.21	3.87	0.00	0.00	5.75	91.01	3.24					
2007 Non-MSA Allegan County	31	13.03	0.00	0.00	0.00	0.00	66.83	25.81	33.17	74.19	0.00	0.00	67.83	32.17					
Limited-Review:																			

(*) Based on 2007 Aggregate HMDA Data only.

(**) Home purchase loans originated and purchased in the MSA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT State: MI Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007														
MA/Assessment Area	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total **	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
2007 Grand Rapids MSA	6	46.15	1.21	0.00	13.74	0.00	54.48	50.00	30.58	50.00	1.53	11.90	54.05	32.52
2007 Holland MSA	2	15.38	0.00	0.00	4.67	0.00	91.47	100.00	3.87	0.00	0.00	4.99	92.36	2.64
2007 Non-MSA Allegan County	5	38.46	0.00	0.00	0.00	0.00	66.83	0.00	33.17	100.00	0.00	0.00	69.57	30.43
Limited-Review:														

(*) Based on 2007 Aggregate HMDA Data only.

(**) Home improvement loans originated and purchased in the MSA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														State: MI		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007			
MA/Assessment Area	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*								
	#	% of Total **	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full-Review:																			
2007 Grand Rapids MSA	84	43.52	1.21	3.57	13.74	5.95	54.48	32.14	30.58	58.33	1.48	14.79	48.78	34.94					
2007 Holland MSA	59	30.57	0.00	0.00	4.67	0.00	91.47	100.00	3.87	0.00	0.00	5.67	90.25	4.08					
2007 Non-MSA Allegan County	50	25.91	0.00	0.00	0.00	0.00	66.83	22.00	33.17	78.00	0.00	0.00	63.45	36.55					
Limited-Review:																			

(*) Based on 2007 Aggregate HMDA Data only.

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

(***) Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY State: MI Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007														
MA/Assessment Area	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total **	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
2007 Grand Rapids MSA	2	66.67	0.84	0.00	19.49	100.00	67.89	0.00	11.78	0.00	0.00	50.00	50.00	0.00
2007 Holland MSA	0	0.00	0.00	0.00	4.25	0.00	94.68	0.00	1.07	0.00	0.00	21.43	78.57	0.00
2007 Non-MSA Allegan County	1	33.33	0.00	0.00	0.00	0.00	88.36	100.00	11.64	0.00	0.00	0.00	100.00	0.00
Limited-Review:														

(*) Based on 2007 Aggregate HMDA Data only.

(**) Multifamily loans originated and purchased in the MSA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

(***) Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily units in the area based on 2000census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														State: MI		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007											
MA/Assessment Area	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*																
	#	% of Total **	% Businesses ***	% BANK Loans	% Businesses ***	% BANK Loans	% Businesses ***	% BANK Loans	% Businesses ***	% BANK Loans	Low	Mod	Mid	Upp													
Full-Review:																											
2007 Grand Rapids MSA	0	0.00	2.63	0.00	17.31	0.00	47.33	0.00	32.72	0.00	2.25	13.94	44.44	38.45													
2007 Holland MSA	0	0.00	0.00	0.00	8.18	0.00	89.30	0.00	2.52	0.00	0.00	5.59	90.81	2.36													
2007 Non-MSA Allegan County	0	0.00	0.00	0.00	0.00	0.00	67.94	0.00	32.06	0.00	0.00	0.00	59.77	37.62													
Limited-Review:																											

(*) Based on 2007 Aggregate Small Farm Data only.

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

(***) Source of data - DUN & BRADSTREET 2007.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE														State: MI		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007											
MA/Assessment Area	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%) **																
	#	% of Total *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	Low	Mod	Mid	Upp													
Full-Review:																											
2007 Grand Rapids MSA	151	63.45	17.12	4.64	17.98	27.15	23.99	24.50	40.91	41.72	8.63	22.97	21.64	30.01													
2007 Holland MSA	56	23.53	14.28	16.07	19.84	33.93	29.76	19.64	36.12	26.79	13.04	27.48	20.54	23.01													
2007 Non-MSA Allegan County	31	13.03	12.20	3.23	14.73	22.58	23.69	41.94	49.38	32.26	3.34	17.49	22.72	39.39													
Limited-Review:																											

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

(**) Based on 2007 Aggregate HMDA DATA only.

(***) Percentage of Families is based on the 2000 Census information.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT State: MI Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007														
MA/Assessment Area	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%) **			
	#	% of Total *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	Low	Mod	Mid	Upp
Full-Review:														
2007 Grand Rapids MSA	6	46.15	17.12	16.67	17.98	0.00	23.99	16.67	40.91	66.67	8.09	21.31	27.50	41.25
2007 Holland MSA	2	15.38	14.28	0.00	19.84	50.00	29.76	50.00	36.12	0.00	13.07	24.67	30.25	30.25
2007 Non-MSA Allegan County	5	38.46	12.20	0.00	14.73	0.00	23.69	20.00	49.38	80.00	5.12	18.16	27.11	46.55
Limited-Review:														

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
 (**) Based on 2007 Aggregate HMDA DATA only.
 (***) Percentage of Families is based on the 2000 Census information.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE State: MI Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007														
MA/Assessment Area	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%) **			
	#	% of Total *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	% Families ***	% BANK Loans *	Low	Mod	Mid	Upp
Full-Review:														
2007 Grand Rapids MSA	84	43.52	17.12	5.95	17.98	19.05	23.99	29.76	40.91	34.52	6.54	19.84	22.51	32.83
2007 Holland MSA	59	30.57	14.28	5.08	19.84	27.12	29.76	25.42	36.12	37.29	8.74	23.31	26.06	25.13
2007 Non-MSA Allegan County	50	25.91	12.20	6.00	14.73	12.00	23.69	22.00	49.38	54.00	2.79	11.97	23.17	44.52
Limited-Review:														

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.
 (**) Based on 2007 Aggregate HMDA DATA only.
 (***) Percentage of Families is based on the 2000 Census information.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES State: MI Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007									
MA/Assessment Area	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Data ***	
	#	% 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:									
2007 Grand Rapids MSA	0	0.00	86.35	0.00	0	0	0	24,309	9,212
2007 Holland MSA	0	0.00	88.52	0.00	0	0	0	10,724	4,533
2007 Non-MSA Allegan County	0	0.00	89.83	0.00	0	0	0	4,022	1,831
Limited-Review:									

(*) Farms with revenues of \$1 million or less as a percentage of all farms. Data - DUN & BRADSTREET 2007.

(**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

(***) Based on 2007 Aggregate Small Farm data only.

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

Table 11. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										State: MI		Evaluation Period: JANUARY 01, 2007 TO DECEMBER 31, 2007						
MA/Assessment Area	Deposits	Branches						Branch Opening / Closings				Population						
	% of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full-Review:																		
2007 Grand Rapids MSA	0.00	5	35.71	0	1	2	2	0	0	0	0	0	0	0	2.59	18.72	52.45	26.24
2007 Holland MSA	0.00	5	35.71	0	0	5	0	0	0	0	0	0	0	0.00	5.86	90.83	3.31	
2007 Non-MSA Allegan County	0.00	4	28.57	0	0	1	3	0	0	0	0	0	0	0.00	0.00	67.84	32.16	
Limited-Review:																		

(*) Farms with revenues of \$1 million or less as a percentage of all farms. Data - DUN & BRADSTREET 2007.
 (**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.
 (***) Based on 2007 Aggregate Small Farm data only.
 (****) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.