



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

May 17, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of America
Charter Number: 14740

241 East Saginaw, Suite 101
East Lansing, MI 48823

Office of the Comptroller of the Currency

Northern Ohio Field Office
Omni Office Center 26877 Northwestern Highway
Southfield, MI 48034-2141

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.

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION	7
SCOPE OF THE EVALUATION	7
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	8
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	9
LENDING TEST	9
INVESTMENT TEST	12
SERVICE TEST	13
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

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 geographic distribution of loans among geographies of different income levels is adequate.
- The distribution of loans among borrowers of different income levels and businesses of different sizes is good.
- Lending volumes within the bank's assessment area are low but considered adequate.
- Qualified investment activity is adequate.
- The accessibility of delivery systems to geographies and individuals of different income levels is reasonable.
- The provision of community development services is good.

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 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 (CD): 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.

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 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 (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on 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 ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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) 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.

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) is a full service intrastate bank headquartered in East Lansing, Michigan. With one banking office, FNBA had total assets of \$476 million as of December 31, 2009. FNBA is a wholly-owned subsidiary of First National Bancshares, a \$568 million one-bank holding company also located in East Lansing. Other holding company subsidiaries have operations that manage acquired real estate, tax liens, land contracts, and subordinated debentures. None of these non-bank operations impact FNBA's capacity to address the credit needs of the community.

FNBA subsidiaries include a community development corporation as well as entities that perform loan servicing, conduct wholesale lending, administer foreclosure assets, perform payroll functions, and perform building management functions. At the request of the bank, we considered the activities of First National Development Company (FNDC) in this evaluation. While FNDC increases FNBA's capacity to reinvest in the community through home rehabilitation activities, the other subsidiaries do not materially impact the bank's community reinvestment capacity.

Offering a wide range of banking products and services, FNBA's primary business focus is providing residential real estate loans to customers with impaired credit or non-conforming collateral, including mobile homes. FNBA operates across the country, with nearly 40 percent of new loan activity originated through a broker network. Some consumer, business, and agricultural lending is also done. As of year-end 2009, the bank's loan portfolio totaled \$362 million, including \$360 million in real estate secured loans. Within the real estate segment, 73 percent were for 1-4 family residential, 13 percent were construction and development, 3 percent farm, and 11 percent non-farm / non residential. Brokered deposits represent 43 percent of all bank deposits. According to bank reports, 42 percent of deposits stem from the bank's assessment area (AA).

No financial or legal impediments hindered FNBA's ability to address community needs during the evaluation period. As of year-end 2009, Tier 1 Capital was \$63.6 million. The last CRA evaluation was performed as of July 24, 2006 and resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is July 24, 2006 through May 17, 2010. The start of the evaluation period corresponds to the date that the prior evaluation was performed. We analyzed HMDA and small loans to businesses and farms data for the calendar years 2006 through 2009. The review period for CD loans, qualified investments, and CD services is July 24, 2006 through May 17, 2010. Refer to Appendix A for additional information.

Data Integrity

We tested the accuracy of public information filed by the bank for home mortgage loans and small loans to businesses and farms. We also reviewed CD loans, qualified investments, and CD services to ensure that they meet the regulatory definition of CD. Some data errors were identified and corrected. This evaluation is based on corrected data.

Selection of Areas for Full-Scope Review

We performed a full-scope review on FNBA's only AA, the Lansing-East Lansing MSA. Refer to Appendix A for more information.

Ratings

The bank's overall rating of "Satisfactory" is based on our assessment of FNBA's performance in its AA.

When determining conclusions for the Lending Test, loan products were generally weighted according to their relative volume. Home mortgage activity was weighted greater than small loans to businesses and small loans to farms. Among the home mortgage products, refinances received the most weight.

Other

Bank management elected to have FNBA evaluated under Large Bank performance standards.

Our evaluation took into consideration information derived from members of the local community. We contacted five organizations that focus on affordable housing, neighborhood revitalization, the provision of social services to low- and moderate-income individuals, and small business economic development initiatives. 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

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the lending test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance within the Lansing-East Lansing MSA is adequate.

Lending Activity

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

The level of FNBA's lending activity during the evaluation period is low, but considered adequate. The bank made a total of 331 reportable and non-reportable loans of \$35 million within the AA. In drawing conclusions, consideration was given to the bank's limited physical presence, the large number of lenders operating in the area, and the economic conditions of the area that had a negative impact on lending in general, as discussed under the Market Profile section in Appendix B.

FNBA's lending activity in the AA is somewhat lower than its position in the local deposit market. The bank's lending market share is below one percent for each home mortgage loan and business loan type. According to June 30, 2009 FDIC deposit data, FNBA was ranked sixth in deposits among 24 depository institutions with a 6.2 percent share of the market. However, when FNBA's non-local deposits (primarily brokered deposits) are excluded, FNBA is ranked 12th with a 2.7 percent market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of FNBA's loans is adequate. Based on volume, home refinance lending performance received the most weight when drawing conclusions.

The volume of multifamily loans and small loans to farms was too small to perform meaningful analyses. Furthermore, the bank's market shares for all loan types were too small for meaningful analyses.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans and home improvement loans is excellent. For both of these loan types, the percentages of loans in low-income geographies and moderate-income geographies significantly exceed the percentages of owner-occupied housing units that are located in those areas. While performance calculations reflect excellent performance, the number of loans involved is relatively low.

The geographic distribution of home refinance loans is poor. The percentage of loans in moderate-income geographies is significantly below the percentage of owner-occupied housing units in those areas, and no FNBA loans were made in low-income areas during the evaluation period.

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/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The percentage of loans in both low-income and moderate-income geographies significantly exceeds the portion of businesses located in those areas.

Other (non-reported) Loans

The bank extended several loans that are not reportable for HMDA and CRA purposes, including construction loans and loans secured by vacant land. Of the 26 loans reflected on Table 1 – Other Products in Appendix C, two loans (7.7 percent) were made in low-income areas, and six loans (23.1 percent) were made in moderate-income areas. A comparison to demographics cannot be readily performed as the loans represent a mix of types that do not share common demographic characteristics.

Lending Gap Analysis

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

Inside/Outside Ratio

A small percentage of FNBA's reportable loans are located within the AA. Overall, 7.5 percent of the number of loans and 16.3 percent of loan dollars are from within the AA. This record is consistent with the bank's national lending business strategy. Considering the bank's narrow business focus, its reliance on loan brokers from various parts of the country, and the fact that a majority of deposits are not from the local area, the low percentage of lending in the AA had a neutral impact on our conclusions regarding the bank's overall geographic distribution performance.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of FNBA's loans is good overall. Based on volume, home refinance lending performance received the most weight when drawing conclusions.

The volume of small loans to farms was too small to perform meaningful analyses. Furthermore, the bank's market shares for all loan types were too small for meaningful analyses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the market profile in Appendix C for demographic information, including the poverty rate.

The borrower distribution of home purchase loans and home improvement loans is excellent. For both of these loan types, the percentages of loans made to moderate-income borrowers significantly exceed the percentages of families in those income categories within the AA. The percentage of home improvement loans to low-income borrowers also significantly exceeds the demographic. The percentage of home purchase loans to low-income borrowers is somewhat below the percentage of low-income families within the AA.

The borrower distribution of home refinance loans is adequate. The percentage of loans to moderate-income borrowers is somewhat below the percentage of moderate-income families in the AA. While the percentage of loans to low-income borrowers is somewhat lower than the percentage of low-income families in the area, consideration is given to the impact that the area's poverty level has on the opportunities to lend to the low-income segment of the community.

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/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds the percentage of area businesses that have revenues of \$1 million or less. FNBA has a good record of making loans of all size levels, with nearly two-thirds at amounts of \$100 thousand or less.

Other (non-reported) Loans

The bank extended several loans that are not reportable for HMDA and CRA purposes, including construction loans and loans secured by vacant land. Of the 26 loans reflected on

Table 1 – Other Products in Appendix C, four loans (15.4 percent) were made to low-income borrowers, and five loans (19.2 percent) were made to moderate-income borrowers. Relative to the percentages of low-income and moderate-income families in the AA, this performance is good.

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 community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

FNBA's CD lending performance is adequate. Community development loan activity during the evaluation period consisted of two loans located within the AA totaling \$248 thousand, and six loans totaling \$938 thousand located outside of the AA, but within the broader state-wide and regional area. All CD loans were for multi-family rental purposes with rents affordable to low- and moderate-income individuals. In addition, one of the bank's small business loans made outside of the AA but within the state-side or regional area demonstrated CD characteristics as well.

Product Innovation and Flexibility

FNBA offers flexible lending which can help address the credit needs of low- and moderate-income individuals and geographies in a safe and sound manner. FNBA provides flexible financing to customers with impaired credit and to homeowners who are at risk of losing their home because of delinquent property taxes. The bank has also deferred loan payments for victims of national disasters. The bank's programs are available to areas that include the bank's AA. The impact of flexible lending to low- and moderate-income borrowers and geographies in the AA has a neutral effect on Lending Test conclusions.

INVESTMENT TEST

The bank's performance under the investment test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Lansing-East Lansing MSA is adequate. Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

FNBA was responsive to the community development needs of the AA through making qualified investments totaling \$365 thousand during the evaluation period. Current and prior period investments are comprised of the following:

- ◆ An investment of \$236 thousand into the bank's community development company, FNDC. This is considered to be a current period investment as all investment dollars were used during the evaluation period. The primary activity of the CDC has been to

acquire and rehabilitate nine homes within the bank's AA, seven of which are located in low-income or moderate-income neighborhoods, and all homes in price ranges affordable to low- and moderate-income individuals. This activity is directly responsive to the neighborhood revitalization and affordable housing needs of the community, and reflects innovativeness and complexity compared to many typical investments. Furthermore, the CDC's impact is greater than the invested dollars, as funds are re-deployed for other rehabilitation projects as finished properties are sold.

- ◆ A \$75 thousand investment was made during the evaluation period in a mortgage-backed security fund. Collateral for the underlying loans is single family homes for low- and moderate-income individuals within the bank's AA. Prior period investments in the fund totaling \$500 thousand also continue to be outstanding. These investments help address the affordable housing needs of the community.
- ◆ The bank provided financial grants and in-kind donations totaling \$54 thousand to 17 local community organizations for CD initiatives for affordable housing, social services for low- and moderate-income individuals, neighborhood revitalization, and small business financing related programs.

SERVICE TEST

The bank's performance under the Service Test is rated "Low-Satisfactory." Based on a full-scope review, the bank's performance in the Lansing-East Lansing MSA is adequate.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FNBA's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the AA. FNBA operates exclusively out of its main office located in an upper-income geography in East Lansing. No offices were opened or closed during the evaluation period. While FNBA does not have a physical presence in the low- and moderate-income sections of the AA, the bank's lending activity reflects that these areas are being served by the bank. Office hours and services are provided in a manner that does not inconvenience any portions of the AA, including the low- and moderate-income areas and individuals, with some extended hours available.

Access to products and services are also available through some alternative delivery systems, including banking by mail, telephone, and internet. While the bank operates one full-service ATM at its main office, it also provides customers free access to a national ATM network system. Twenty of the ATMs within the network are located within the AA, including four in moderate-income areas and one in a low-income area. As specific information is not available regarding the degree in which low- and moderate-income individuals and geographies are impacted by these services, significant weight cannot be placed on these alternative delivery systems when drawing conclusions for performance.

Community Development Services

Through its employees, FNBA provides a good level of CD services to the AA. Bank personnel provide financial and technical expertise to organization involved in affordable housing, social services for low- and moderate-income individuals, economic development, and small business financing. Primary examples are:

- ◆ Bank officers and employees hold officer positions and are active members of committees and boards of organizations that provide CD programs for the local community, including affordable housing and social services for low- and moderate-income individuals.
- ◆ Employees have participated in several financial literacy initiatives for low- and moderate-income adults, students, and small business owners.
- ◆ The bank has provided office space free of charge for community organizations to hold meetings for community development initiatives.

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): 01/01/2006 to 12/31/2009 Investment and Service Tests and CD Loans: 07/24/2006 to 05/17/2010	
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, community development services, and other non-reportable loan data provided by the bank.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
First National Development Company (FNDC)	Subsidiary	Community development activities.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Lansing-East Lansing MI MSA #29620	Full Scope	None

Appendix B: Market Profiles for Full-Scope Areas

FNBA Assessment Area (Lansing-East Lansing, MI MSA #29620)

Demographic Information for Full-Scope Area: FNBA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	117	7.69	21.37	49.57	19.66	1.71
Population by Geography	447,728	5.69	16.98	55.47	21.05	0.80
Owner-Occupied Housing by Geography	115,901	1.72	13.87	61.20	23.22	0.00
Businesses by Geography	35,045	4.42	17.38	52.03	23.95	2.22
Farms by Geography	1,658	0.72	6.27	76.90	16.04	0.06
Family Distribution by Income Level	110,774	18.99	18.70	23.64	38.67	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	41,750	6.58	24.60	56.54	12.27	0.00
Median Family Income = \$55,552			Median Housing Value = \$107,179			
HUD Adjusted Median Family Income for 2009 = \$67,000			Unemployment Rate = 10.8%			
Households Below the Poverty Level = 11%			(2009 unadjusted)			

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2000 U.S. Census and 2009 HUD updated MFI.

FNBA's AA consists of the entire Lansing-East Lansing, Michigan MSA (29620). The MSA is comprised of Clinton, Eaton, and Ingham Counties 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 capitol, and Michigan State University is based in East Lansing. Service, retail trade, and government are the largest industries in the area. According to the Lansing Regional Chamber of Commerce, the largest employers are the State of Michigan, Michigan State University, Sparrow Health Systems, and General Motors Corporation.

Competition is strong within the banking and lending markets. According to June 30, 2009 FDIC deposit data, there are 24 insured depository institutions operating 126 offices in this three-county area with a population of 448 thousand. According to aggregate HMDA data, 270 lenders originated home mortgage loans in the AA during 2008. FDIC deposit data reflects that FNBA is ranked sixth in deposits with a 6.2 percent share of the market. However, when FNBA's non-local deposits (primarily brokered deposits) are excluded, FNBA is ranked 12th with a 2.7 percent market share. The largest deposit competitors are Fifth Third Bank, PNC Bank, National Association (formerly National City Bank), and Citizens Bank, each with deposit markets shares exceeding 10 percent.

The Michigan and local economies deteriorated during the evaluation period, as evidenced in part by problems within the U.S. automotive industry. Local and statewide unemployment

levels increased during the period as well. The average unadjusted unemployment rate for the Lansing-East Lansing MSA increased during the evaluation period from 5.8 percent in 2006 to 10.8 percent in 2009. Regardless, the local unemployment rates were favorable in comparison to those for the state, which at times were the highest in the country. The statewide unadjusted unemployment average was 6.9 percent in 2006, and 13.6 percent in 2009. Housing markets were negatively impacted and foreclosure rates increased. Aggregate home mortgage lending volumes for the MSA declined during the evaluation period by over 40 percent from 2004-2005 levels. Approximately 11 percent of AA households are below the poverty level, with 49 percent of low-income households below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

Assessment Area Needs

There have been opportunities to make CD loans and qualified investments, and to provide CD services within the area. The competition for involvement in larger projects is high as a large number of financial institutions operate in the AA, as discussed above. Community resources and opportunities exist where banks can participate in partnerships to address the credit and community development needs. There are various community development organizations that have the capacity to help address community needs, as well as local government programs.

Our evaluation took into consideration information derived from the bank as well as members of the community. We met with five organizations that focus attention on affordable housing, neighborhood revitalization, the provision of social services to low- and moderate-income individuals, and small business economic development initiatives. Common needs identified include additional safe affordable housing, the rehabilitation of existing homes, and neighborhood revitalization. Mortgage products with flexible underwriting and downpayment assistance features are needed, as well as small business financing and micro-loan programs. There is a need for additional homebuyer support programs, including homebuyer and home ownership counseling, foreclosure prevention, credit repair, and general financial literacy. Local community organizations need additional funding and credit support.

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 description for Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See description for 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 description for Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See description for 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: MICHIGAN						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
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:												
FNBA AA	100.00	260	28,579	32	3,392	11	1,148	2	248	305	33,367	100.00
CD loans in state/region but outside of AA with no potential benefit to AA								6	690			

* Loan Data as of December 31, 2009. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is July 24, 2006 to May 17, 2010.

*** Deposit Data as of June 30, 2009 . Rated Area refers to the state.

Table 1. Other Products

LENDING VOLUME		Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009	
MA/Assessment Area:	Other Unsecured Consumer Loans			Other Optional Loans	
	#	\$ (000's)		#	\$ (000's)
Full Review:					
FNBA AA	0	0		26	1,632

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2009		Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31,							
MA/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 AA	61	100.00	1.72	8.20	13.87	18.03	61.20	47.54	23.22	26.23	0.58	1.67	0.39	0.55	0.66

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2009			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31,					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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 AA	55	100.00	1.72	16.36	13.87	18.18	61.20	58.18	23.22	7.27	0.87	0.00	1.55	0.91	0.45	

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2009			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2006 TO DECEMBER					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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 AA	141	100.00	1.72	0.00	13.87	9.22	61.20	52.48	23.22	38.30	0.38	0.00	0.42	0.26	0.70	

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
FNBA AA	3	100.00	14.64	0.00	19.48	66.67	46.19	0.00	19.69	33.33	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 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: MICHIGAN				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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 AA	32	100.00	4.42	12.50	17.38	28.13	52.03	53.13	23.95	6.25	0.12	0.00	0.26	0.17	0.00	

* Based on 2008 Peer Small Business Data: U.S.

** 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 2009.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 2009			Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
MA/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 AA	11	100.00	0.72	0.00	6.27	0.00	76.90	100.00	16.04	0.00	0.90	0.00	0.00	1.11	0.00

* Based on 2008 Peer Small Business Data: U.S.

** 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 2009

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
FNBA AA	61	100.00	18.99	17.65	18.70	25.49	23.64	23.53	38.67	33.33	0.66	1.13	0.34	0.68	0.76

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 11.8% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2009		Geography: MICHIGAN								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31,					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
FNBA AA	55	100.00	18.99	48.00	18.70	32.00	23.64	8.00	38.67	12.00	0.91	3.94	0.42	0.71	0.29

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 8.2% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2009		Geography: MICHIGAN								Evaluation Period: JANUARY 1, 2006 TO DECEMBER					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
FNBA AA	141	100.00	18.99	4.42	18.70	16.81	23.64	26.55	38.67	52.21	0.48	0.42	0.37	0.46	0.56

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 13.6% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 31, 2009				Geography: MICHIGAN			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009		
MA/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 AA	32	100.00	76.96	84.38	65.63	28.13	6.25	0.12	0.30

* Based on 2008 Peer Small Business Data: U.S.

** 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 - 2009.

**** Small loans to businesses with revenues of \$1 million or less as a percentage of reported small loans to businesses. No information was available for 12.5% 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 2009				Geography: MICHIGAN			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009		
MA/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 AA	11	100.00	97.17	0.00	72.73	18.18	9.09	0.90	0.00

* Based on 2008 Peer Small Business Data: U.S.

** 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 businesses. Source: D&B - 2009.

**** Small loans to farms with revenues of \$1 million or less as a percentage of reported small loans to farms. No information was available for 100% of small loans to farms originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009			
MA/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 AA	1	500	19	365	20	865	100	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: MICHIGAN				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					
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 AA	100.00	1	100.00	0	0	0	100	0	0	0	0	0	0	5.69	16.98	55.47	21.05