

PUBLIC DISCLOSURE

April 12, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old Kent Bank, N.A.
Charter #23174

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Jonesville, Michigan 49250

Comptroller of the Currency
Detroit Field Office
Omni Officentre, Suite 411
26877 Northwestern Highway
Southfield, Michigan 48034

NOTE: 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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GENERAL INFORMATION

The CRA (Community Reinvestment Act) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Old Kent Bank, N.A.** prepared by the OCC (Office of the Comptroller of the Currency), the institution's supervisory agency, as of **April 12, 1999**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

INSTITUTION'S CRA RATING: This institution is rated as having a **Satisfactory record of meeting community credit needs.**"

The following are the primary factors supporting Old Kent Bank, N.A.'s (OKB) performance under the lending, investment and service tests.

C Lending Test

Old Kent Bank's geographic distribution of small business and small farm loans is satisfactory. The bank made a majority (76 percent) of its loans within its assessment area. Also, the bank's distribution of loans to borrowers of various income levels and businesses of different sizes is reasonable. Old Kent Bank has addressed the needs of small businesses in its market area. The bank has concentrated its commercial lending efforts on businesses with sales less than \$1 million. Old Kent Bank has a reasonable level of community development loans.

C Investment Test

Old Kent Bank and its affiliates made an acceptable level of qualified investments given the limited investment opportunities within the area.

C Service Test

The bank has provided a good level of community development services. A primary issue facing local businesses is job training. Management has successfully addressed the needs of small businesses by supporting the community initiative of improving job skills. This

project is essential for low- and moderate-income individuals who are trying to improve their earning potential. Delivery systems are reasonably accessible to geographies and individuals of different income levels.

The following table summarizes the performance level of OKB with respect to the lending, investment, and service tests.

Performance levels	Old Kent Bank, N.A.		
	Lending Test *	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			

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

DESCRIPTION OF INSTITUTION

Old Kent Bank is a full-service community bank, which primarily services Hillsdale County, Michigan. Old Kent Bank is a wholly owned subsidiary of Old Kent Financial Corporation. This multi-bank holding company has assets of approximately \$16 billion and is active throughout the state of Michigan. Old Kent Bank has two offices and two full-service ATMs (automatic teller machines).

As of December 31, 1998, total assets of the bank were \$117.3 million. The bank's loan portfolio represented 83 percent of total assets. The portfolio consisted of residential and commercial real estate loans (54 percent), loans to consumers (18 percent), and commercial loans (28 percent). The bank's primary lending focus has been on serving the community by originating commercial loans to small businesses and consumer loans to individuals of all income levels.

There are no legal impediments that would adversely affect the bank's ability to serve the community. The bank was chartered as a national bank in April of 1997 and this is the first evaluation of their performance under the CRA.

DESCRIPTION OF ASSESSMENT AREA

Old Kent Bank's assessment area consists of Hillsdale County. This area includes 12 BNAs (block numbering areas), of which one is designated as an upper-income tract and eleven are designated as middle-income tracts. There are no low- or moderate-income BNAs in the county. The 1990 census data also shows that 17 percent of the area's families are low-income,

17 percent are moderate-income, 24 percent are middle-income and 42 percent are upper-income. The county is primarily a rural area located approximately 90 miles southwest of Detroit, Michigan. The median housing value in the county is \$42,168.

The bank's trade area is rural. Most of the area businesses focus on manufacturing (primarily auto related). There are also some small farming operations in the county. Major employers in the area are Hillsdale Manufacturing, Walker Manufacturing, SKD, LP, Teleflex, Inc., Swift, Ekrich, and Mark I Molded Plastics. Unemployment as of January 1999 for the county was

3.9 percent, compared to 4.5 percent for the state of Michigan. The area has seen modest economic growth over the past two years. The population in the county was 45,887 in 1996, a slight increase from 43,431 in 1990. There has been minimal residential construction in the area in the past few years.

There are approximately 1,500 businesses and farms within the assessment area. According to internal analysis performed by Old Kent Financial Corp staff, approximately 90 percent of the businesses and farms have revenues of less than \$1 million. These same reports showed that

96 percent of these businesses are located in middle-income areas. Based on our review of these reports and supporting data, this information was considered reliable.

Old Kent Bank is one of seven financial institutions with offices in this market. Local competition is provided by credit unions, savings banks, an independent bank, and branches or affiliates of regional banks. Based on June 30, 1998, deposit data from the Federal Deposit Insurance Corporation Market Share Report, OKB is the second largest bank in the local market, with a market share of 27 percent.

Two community contacts were made during the examination and two additional contacts (made during the last year) were reviewed. The community contacts included a local realtor, a member of the chamber of commerce, and officials from local government.

Based on these community contacts, the primary credit needs in the county are for housing and small businesses, especially job training. A local government official stated a community-wide initiative is underway to improve job skills of the local workforce. Home purchase loans are also a primary credit need. A substantial portion of OKB's loans are for these purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

This evaluation covers activity from the bank's inception to date. The primary data used in the lending analysis was the years of 1997 and 1998. Overall, OKB addresses the community credit needs in a manner consistent with its size, resources, and capabilities. Our review focused on small business, consumer and home purchase loans. Consumer loans, primarily home equity and direct consumer, comprise a significant portion of the bank's lending activities.

Lending Test

Old Kent Bank's lending activity shows a satisfactory response to identified credit needs within its assessment area. The bank originated small business, consumer and home purchase loans throughout its assessment area, and to borrowers of all income levels. The bank's average loan-to-deposit ratio over the rating period was high at 95 percent. Market share data for mortgage loans was not available because the bank's assessment area is non-MSA and the bank is not required to submit HMDA data. Also, market share data for small business and farm loans was not available due to lack of data from competitors.

In 1997, the bank originated 157 loans secured by residential mortgages (including home purchase, refinance and home improvement) totaling \$11 million. In 1998, originations increased to 329 loans totaling \$23 million. County records for 1998 show that four lending institutions accounted for 50 percent of the loans recorded in the county. Old Kent Bank ranked second in this group with 15 percent of all mortgages originated.

The bank also originated 198 small business (non-farm) loans in 1997 and 171 loans in 1998. The total of these loans was \$17 million, which resulted in an average loan size of \$46,000. These businesses all had annual revenues less than \$1 million. Internal data

shows that approximately 90 percent of all businesses in the assessment area have annual revenues less than \$1 million.

During this time period the bank also made 98 loans to fund farm operations. All of these loans were to farms located within their assessment area. Also, every one of these farms had revenues less than \$1 million. Tables 6 and 11 show additional details of this lending activity. In 1997, the bank originated 583 loans for various consumer purposes. This lending increased to 721 loans in 1998. Approximately 85 percent of these loans were made to borrowers in the bank's assessment area.

Table 1 shows the bank's overall lending activity during the review period. The bank continues to offer a full range of lending products; however, its primary focus is on small business lending. Tables 2 through 6 show the geographic distribution of various loan products.

Geographic Distribution of Loans

While there are no low- or moderate-income tracts in the bank's assessment area, it is noted that 76 percent of OKB's loans are within its assessment area. Also, the bank originated loans for all major products in every BNA within their assessment area for both 1997 and 1998. According to internal data, the bank originated 96 percent of its home purchase, refinance and home improvement loans in middle-income areas. Additionally, the bank originated 99 percent of its small business loans and 88 percent of their farm loans in middle-income areas.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

Residential mortgage lending

During 1997 and 1998, the bank originated 486 mortgage related loans. As shown in tables 7 through 9, while 21 percent of the borrowers in the bank's assessment area were low-income, the bank originated 3 percent of its home purchase loans, 1 percent of its refinance loans, and

15 percent of home improvement loans to low-income individuals. These tables also show that 14 percent of the borrowers in the bank's assessment area are moderate-income and the bank originated 8 percent of its home purchase loans, 11 percent of its refinance loans, and 23 percent of home improvement loans to moderate-income borrowers. While the

percentage of OKB's real estate lending to low- and moderate-income borrowers is low, its consumer and small business lending performance (as discussed below) displays reasonable penetration throughout the assessment area.

Small business lending

Old Kent Bank is also very active in small business lending. Old Kent Bank originated 412 commercial loans totaling \$25 million in 1997 and 1998. This total includes 369 loans (90 percent) to businesses with less than \$1 million in annual revenues, which is high compared to business demographics that show 78 percent of the businesses in the assessment area have annual revenues less than \$1 million. Also, 84 percent of the bank's loans were for less than \$100,000. Table 10 shows the bank's distribution of these loans by loan amount.

Farm lending

Old Kent Bank originated 47 loans totaling \$13 million to area farms in 1997. They increased this to 51 loans totaling \$15 million in 1998. All of these loans were to farm operations with less than \$1 million in gross revenues. This level of lending is higher than business statistics that show 95 percent of the area farm operations have annual revenues less than \$1 million. Also, 91 percent of the bank's loans were for less than \$100,000.

Consumer lending

In 1997 and 1998, the bank originated 1,304 loans for various consumer purposes. Analysis of internal records showed that 15 percent of these loans were to low-income borrowers, 21 percent were to moderate-income borrowers, 30 percent were to middle-income individuals, and 34 percent were to upper-income individuals. This shows satisfactory distribution when compared to 1990 census data, which shows 21 percent of the households designated as low-income, 14 percent as moderate-income, 19 percent as middle-income, and 46 percent as upper-income.

Investment Test

Old Kent Bank has demonstrated an acceptable record of responsiveness to affordable housing needs by participating in two housing investments. These investments are for low-income housing projects throughout the state of Michigan, which includes the bank's entire assessment area. Old Kent Financial Corporation (the bank's sole shareholder) made \$3,5 million to these investments during 1998 as part of their ongoing support of this project. Old Kent Financial has allocated \$500,000 of these investments to OKB. This amount will not be credited to other banks for CRA purposes.

Through research of Internet sites and discussions with corporate management, it was confirmed that limited investment opportunities existed in the bank's assessment area. Contacts with local government officials also noted that residential housing projects had been minimal in the recent years. There are no other projects for low- and moderate-income housing currently underway in this market area.

Additionally, the bank donated funds in 1998 to the Hillsdale Technology Center to pay start-up costs. This center's primary focus is to provide job training for local residents. The local community has identified the need for improved job skills as economic priority. This effort will provide low- and moderate-income individuals with the opportunity to increase their earning potential.

Service Test

Community Development Services

Old Kent Bank has provided a good level of community development services within its assessment area. The bank's efforts have been concentrated on job training, which was one of the needs identified in the community. The overall goal is provide and maintain a trained workforce for the area businesses. This will especially provide low- and moderate-income individuals the opportunity to increase their level of income. Low- and moderate-income individuals comprise over 30 percent of the local population, and this is the only formal training project in the county. Bank management has participated in this project from the beginning and continues to serve as financial advisors.

- The bank has taken an active role in the Hillsdale Technology Center project. This unique endeavor is a community-wide effort to provide various job skills to the local population. The center provides basic job skills; i.e., math and computer courses, as well as manufacturing oriented job training. Training is paid for by local companies and through the use of federal grant money. This system helps low- and moderate-income individuals obtain training they would not have access to otherwise. Individuals can earn college credits (through Jackson Community College) and certification for specific types of machinery.

The primary purpose of the center is to provide job skills to a wide range of individuals which will increase their earning potential. According to local government officials, job training and an updated work force are key elements for the community's continued economic growth.

Old Kent Bank's president has provided technical expertise for this project by participating in monthly finance and budget meetings. He also serves as a board member and the treasurer for this organization.

- Bank management has been active in supporting the Hillsdale Community Health Center. This facility provides health care for the entire county, which includes the bank's assessment area. During 1997 and 1998, over 70 percent of the individuals that received treatment at this facility relied on Medicare or Medicaid to pay for their care. Old Kent Bank's president serves on the finance committee and provides technical expertise on investment matters for this non-profit organization.

Old Kent Bank's delivery system is reasonably accessible to areas and individuals of all income levels. The bank currently operates two full-service offices and two full-service ATMs. These facilities are reasonably accessible to all customers within the bank's assessment area. Both of the bank's branches are located in middle-income BNAs. According to the latest demographic information, 92 percent of the assessment area's population live in middle-income areas.

Hours of branch operation are reasonable and do not vary significantly between locations. Both branches provide the same level of financial services. Additionally, both branches provide drive-up access and Saturday hours of operation. The bank's core hours of operation are from 9:00 A.M. to 4:00 P.M.

Changes in Branch Locations

Old Kent Bank's record of closing branch offices has not affected the accessibility of its services to low- or moderate-income individuals. The bank has not closed a branch in the past two years.

Alternative Systems for Delivering Retail Banking Services

In addition to the services offered at its ATM locations, the bank offers other innovative services to its customers. The bank provides both direct deposit and automatic loan payment capabilities. Two of the bank's alternative systems are described below.

- Telephone Banking is a service that provides customers with access to opening deposit accounts and applying for consumer loans. This is a toll-free service, which supports numerous languages and is available 24-hours a day, seven days a week. This allows customers to access bank products without having to visit a branch location. The reduced fee for this service allows low- and moderate-income full access to bank products.
- The bank also offers direct banking products, such as direct deposit and direct bill paying. These services provide alternatives for customers who do not maintain a minimum balance checking account. This low cost product allows low- and moderate-income individuals equal access to bank products.

Because there was no specific data on how many low- or moderate-income individuals use the services, we did not place significant weight on them in our overall analysis.

There have been no complaints relating to CRA.

Fair Lending

We did not identify any violations of the anti-discrimination laws and regulations during our examination. In addition, the bank received no complaints regarding its fair lending activities. The scope of our fair lending examination included a sample of home purchase loans. We reviewed approved files for single males compared to approved files for single females. This review of terms and conditions found that all applicants were treated similarly.

APPENDIX

Definition of Terms

The following are definitions of terms used throughout this public evaluation. The definitions are not the strict legal definitions contained in 12 C.F.R. 25.12, but rather a more concise synopsis of their meaning.

Community Development - The primary purpose of the loan, investment, or service is for (1) affordable housing for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing small businesses and farms; and (4) activities that revitalize or stabilize low- or moderate-income areas.

Consumer Loan - A loan to one or more individuals for household, family, or other personal expenditures.

Geography - A census tract or BNA (block numbering area).

HMDA Loan - A residential real estate loan (home purchase, home refinance, home improvement, or multi-family).

Low-, Moderate-, Middle-, and Upper-Income Area/Individual - A low-income is when the median family income is less than 50 percent of the area median income, moderate-income is 50-79 percent of the median family income, middle-income is 80-119 percent of the median family income, and upper-income is 120 percent or more of the median family income.

Small Business Loan - A commercial loan with an original loan amount of \$1 million or less.

Small Farm Loan - A farm loan with an original amount of \$500,000 or less.

Table 1. Lending Volume

LENDING VOLUME													State: Michigan	Evaluation Period: December 31, 1996 TO December 31, 1998	
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full-Scope:															
	99%	486	\$34,388	369	\$17,339	98	\$1,495	2	\$160	955	\$39,392	NA			

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE																	State: Michigan	Evaluation Period: December 31, 1996 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
	0%	0%	0%	0%	91%	65%	9%	35%	NA	NA	NA	NA	NA	NA	156	NA			

(*) Based on 199X Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT																	State: Michigan		Evaluation Period: December 31, 1996 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans					
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
	0%	0%	0%	0%	91%	100%	9%	0%	NA	NA	NA	NA	NA	NA	13	NA				

(*) Based on 199X Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE																	State: Michigan		Evaluation Period: December 31, 1996 To December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans					
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
	0%	0%	0%	0%	91%	96%	9%	4%	NA	NA	NA	NA	NA	NA	317	NA				

(*) Based on 199X Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS State: Michigan Evaluation Period: December 31, 1996 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:	0%	0%	0%	0%	96%	99%	4%	1%	NA	NA	NA	NA	NA	NA	369	NA

(*) Based on 199X Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM State: Michigan Evaluation Period: December 31, 1996 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:	0%	0%	0%	0%	96%	92%	4%	8%	NA	NA	NA	NA	NA	NA	98	NA

(*) Based on 199X Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE																
State: Michigan				Evaluation Period: December 31, 1996 TO December31, 1998												
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
	21%	3%	14%	8%	19%	54%	46%	35%	NA	NA	NA	NA	NA	NA	156	NA

(*) As a percentage of loans with borrower income information available. No information was available for XX% of loans originated by BANK.

(**) Based on 199X Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT																
State: Michigan				Evaluation Period: December 31, 1996 TO December 31, 1998												
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
	21%	15%	14%	23%	19%	23%	46%	39%	NA	NA	NA	NA	NA	NA	13	NA

(*) As a percentage of loans with borrower income information available. No information was available for XX% of loans originated by BANK.

(**) Based on 199X Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Michigan				Evaluation Period: December 31, 1996 TO December 31, 1998										
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
	21%	1%	14%	11%	19%	28%	46%	60%	NA	NA	NA	NA	NA	NA	317	NA

(*) As a percentage of loans with borrower income information available. No information was available for XX% of loans originated by BANK.

(**) Based on 199X Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS		State: Michigan			Evaluation Period: December 31, 1996 TO December 31, 1998						
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
	78%	90%	NA	84%	12%	4%	NA	NA	369	16%	\$46,000

(*) As a percentage of businesses with known revenues.

(**) As a percentage of loans with revenue information available. No information was available for XX% of loans originated by BANK.

(***) The market consists of all other Small Business reporters in BANK's assessment area and is based on 199X Aggregate Small Business Data only.

(****) Based on 199X Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM State: Michigan Evaluation Period: December 31, 1996 TO December 31, 1998											
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:	95%	100%	NA	91%	7%	2%	NA	NA	98	4%	\$35,531

(*) As a percentage of farms with known revenues.

(**) As a percentage of loans with revenue information available. No information was available for XX% of loans originated by BANK.

(***) The market consists of all other Small Farm reporters in BANK-s assessment area and is based on 199X Aggregate Small Farm Data only.

(****) Based on 199X Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Michigan Evaluation Period: December 31, 1996 TO December 31, 1998										
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments			
	\$ (000's)	%		\$ (000's)	%		\$ (000's)	%	Total	
Full-Scope:				4			500		4	\$500

(*) Prior Period Investments means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

(*) The percentage of the population in the MSA/assessment area that resides in these geographies.