

Fair Credit Reporting Act

Community First Bank Procedures

BANK'S REPORTING PRACTICES

Community First Bank reports loan activity on a monthly basis to TransUnion, Equifax, Experian, and Innovis which are national credit reporting agencies (CRA). The following types of loans are reported:

- consumer installment
- consumer mortgage
- home equity lines of credit
- consumer revolving lines of credit
- overdraft protection lines of credit

Reporting is effected electronically in Metro 2 format by selecting a certain menu option in the bank's core processing system and uploading the file to the CRA's secure websites.

Negative deposit account information is reported to eFunds on charged off checking and savings accounts. Payments made by consumers to a charged off checking or savings account are also reported to eFunds when the account is paid in full. Reporting is accomplished via the eFunds secure website.

ACCURACY AND INTEGRITY RULE

Community First Bank follows the Rules and Regulations of the Federal Trade Commission to ensure the accuracy and integrity of all information reported to credit reporting agencies. The Bank maintains an accurate and up-to-date central information file so that the data provided:

- Reflects the terms of and liability for the account or relationship;
- Reflects the consumer's performance and other conduct with respect to the account or relationship;
- Correctly identifies the appropriate consumer.

DIRECT DISPUTE RULE

The Direct Dispute Rule allows consumers to take their disputes directly to the furnishers of credit information rather than to act solely through a credit reporting agency. Consumer disputes will be investigated when a consumer submits a dispute notice form. The Consumer Direct Dispute Form is available on the bank's website at www.cfbank.com or at any of the bank's offices.

The dispute must be in writing and list the name, address, telephone number, bank account number, specific information being disputed and an explanation for the basis of the dispute. In addition, supporting documentation, such as a copy of the relevant portion of the consumer report that contains the allegedly inaccurate information, a police report, a fraud or identity theft affidavit, a court order or account statements should be included to substantiate the dispute.

The dispute and supporting documentation should be submitted to the Compliance Officer at Community First Bank, 101 N Wisconsin Avenue, PO Box 65, Muscoda, WI 53573. Disputes may also be faxed to 608-608-739-4081, if prefaced by telephone to 608-739-3154.

BANK'S DUTIES UPON RECEIPT OF NOTICE OF DISPUTE

Notification. Within five business days of receiving notice of a consumer dispute, the Bank must notify the consumer of receipt of the dispute. The furnisher (Bank) must provide the consumer with all "relevant information" during the investigation period.

Investigation. After receiving notice of a dispute, the Bank will:

1. Conduct a reasonable investigation with respect to the disputed information;
2. Review all relevant information provided by the consumer;
3. Report the results of the investigation to the consumer;
4. Report the results to all nationwide consumer reporting agencies to which the Bank furnished the incorrect information if the investigation finds that the original information reported was incomplete or inaccurate;
5. If the information is found to be inaccurate or cannot be verified after any reinvestigation, the Bank will promptly:
 - a. Modify the item of information;
 - b. Delete the item; or
 - c. Permanently block reporting of the item.

The Bank must modify, delete or block any item of information it finds to be inaccurate or simply cannot be verified.

Deadline. The Bank generally must complete its investigation and report within 30 days.

Recordkeeping. The Bank will maintain a file for all disputes that are received. The file will contain information provided by the consumer along with the dispute form and supporting documentation. The file and the results of the bank's investigation will be retained for audit and compliance purposes in accordance with the bank's internal record retention schedule.

FRIVOLOUS OR IRRELEVANT DISPUTES

A dispute will be deemed frivolous or irrelevant if:

- The consumer does not provide sufficient information to investigate the disputed information; or
- The dispute is substantially the same as a dispute previously submitted directly through a credit reporting agency, unless the consumer has provided additional supporting information regarding the dispute.

If the dispute is deemed to be frivolous or irrelevant, the Bank will notify the consumer within five business days of such determination.

ALTERNATIVE METHOD FOR DISPUTE

Community First Bank also participates in an on-line, nonpublic dispute response program called eOscar. When a consumer obtains a free credit report (www.annualcreditreport.com) and wishes to dispute inaccurate or incorrect information shown on the report, the consumer may file a dispute directly with the consumer credit reporting agency (CRA) that provided the free credit report, such as TransUnion, Equifax, or Experian. The CRA notifies the Bank of the dispute through the eOscar system. The bank will investigate and respond to the online dispute through eOscar and the CRA will notify the consumer of the outcome of the investigation.