



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

February 26, 2025

William M. Schaefer  
Chief Financial Officer  
Isabella Bank Corporation  
401 North Main Street  
Mount Pleasant, MI 48858

**Re: Isabella Bank Corporation**  
**Form 10-K for the Fiscal Year Ended December 31, 2023**  
**File No. 000-18415**

Dear William M. Schaefer:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Finance