



## **PUBLIC DISCLOSURE**

July 30, 2018

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Liberty Savings Association  
Charter Number 704214

24 S. Judson Street  
Fort Scott, KS 66701

Office of the Comptroller of the Currency  
7101 College Blvd., Suite 1600  
Overland Park, KS 66210

**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.

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## Overall CRA Rating

The Lending Test is rated: **Satisfactory**.

- Liberty Savings Association's (LSA) in and out ratio is outstanding with the substantial majority of loans originated inside the assessment area (AA).
- The loan-to-deposit (LTD) ratio reflects reasonable responsiveness toward meeting the credit needs of the community.
- LSA's overall distribution of loans to borrowers of different income levels is reasonable.
- The bank received no consumer complaints concerning its performance in meeting the community's credit needs.

## 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 metropolitan area/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. CTs are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AA(s) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(s).

**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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), 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 refinances, 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 metropolitan/AA.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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 Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties 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 MA. 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 MA, the institution will receive a rating for the multi-state MA.

**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) 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 1 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

LSA is a \$32.5 million single-state financial institution headquartered in Fort Scott, Kansas. LSA is a mutual charter. LSA has not opened or closed any branches since the prior CRA examination.

LSA has one AA, which includes all of Bourbon County, Kansas. The AA does not include an MSA. Bourbon County includes four middle-income CTs and one moderate-income CT.

LSA is a full-service financial institution operating one branch in Fort Scott, Kansas. LSA offers a variety of loan and deposit products. However, the institution's primary product is residential real estate mortgages. As of June 30, 2018, the loan portfolio totaled \$9.5 million, or 29 percent of total assets. LSA's loan portfolio consists of the following by dollar: real estate loans (89 percent), commercial loans (2 percent), and other loans (9 percent). Net tier 1 capital totals \$6.5 million and deposits total \$25.9 million. LSA holds 9.32 percent of the AA's deposit market share, which ranks 5<sup>th</sup> out of the six financial institutions in the AA. Primary competitors include Landmark National Bank, UMB Bank, and Union State Bank. Given the amount of competition in the Bourbon County market, LSA has limited lending opportunities.

LSA's strategic plan is to continue originating residential real estate mortgages within the AA. LSA does not have plans for significant loan growth.

There are no legal, financial, or other factors impeding LSA's ability to meet the community's credit needs. LSA received a "Satisfactory" rating at the previous CRA examination dated February 4, 2013.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated LSA's CRA performance under the small bank procedures for the period January 1, 2015 through December 31, 2017. We selected a sample of loans for LSAs two primary products in 2015 and 2016. We did not select a sample for 2017 since LSA did not originate a sufficient number of loans to provide meaningful analysis. By number, consumer loans are one of LSA's primary loan products, comprising 73.87 percent of total loans. In addition, LSA originated residential loans totaling 56.13 percent of total loans by dollar volume. Comparable to census data, our sample included 30 consumer loans and 21 residential loans.



## **Data Integrity**

This evaluation was based on accurate data. LSA is not required to collect and maintain data on consumer loans. Therefore, we utilized random sampling to obtain consumer loan data, including income and geographic data.

## **Selection of Areas for Full-Scope Review**

LSA's AA consists solely of Bourbon County. Refer to Appendix A for more information.

## **Ratings**

LSA's overall rating is based primarily on those areas that received full-scope reviews.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Tests

### LENDING TEST

LSA's performance under the lending test is rated satisfactory.

While the geographic dispersion of loans in LSA's one moderate CT is poor, lending to borrowers of different incomes is reasonable. We gave more weight to the borrower distribution of loans since the AA only consists of one moderate-income CT. The LTD ratio is reasonable and management originated the substantial majority of loans within its AA.

#### Loan-to-Deposit Ratio

LSA's quarterly average LTD ratio is reasonable at 34.3 percent as external factors negatively affect the bank's ability to lend. We calculated LSA's quarterly average LTD ratio on a bank-wide basis using information from the Call Reports submitted between December 31, 2012 and March 31, 2018. The quarterly average LTD ratio for similarly situated financial institutions for the same period is 48 percent. The highest peer ratio is 77.6 percent, and the lowest is 17.7 percent. By LTD ratio, LSA ranked third out of five similarly situated financial institutions. These financial institutions ranged from \$33.4 million to \$52.1 million in asset size, with an average asset size of \$42.87 million.

LSA competes with five other institutions located within its AA, as well as banks outside of its AA. Many of LSA's competitors have larger deposit bases and market shares, and can offer lower loan rates, which negatively affects the LSA's ability to compete. In addition, two competitors have a regional market footprint and a third has a national footprint. A small market share and strong competition negatively impact LSA's lending opportunities.

LSA has an aging customer base and experiences lower loan demand. Total loans declined 14 percent, while deposits declined 7 percent during the review period January 1, 2015 through December 31, 2017. Loan demand continues to decline due to the county's declining population, competition, and low housing inventory for the low to moderate income demographic. Although deposit levels declined during the review period, LSA's total deposits exceed funding needs due to payment of higher yields on deposits, and contributes to the lower-than-average LTD ratio.

#### Lending in Assessment Area

LSA originated a substantial majority of loans by number (79.63 percent) and by dollar amount (65.60 percent), respectively, inside its AA. The OCC's analysis is based on consumer and residential loans originated during 2015 and 2016.

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

The overall borrower distribution of loans is reasonable. The distribution of consumer and residential real estate loans reflects an overall reasonable penetration.

### *Consumer Loans*

Based on data in Table V in Appendix C, we concluded that the borrower distribution of consumer loans is reasonable.

The consumer loan distribution among moderate-income borrowers reflects excellent penetration and exceeded the percentage of such households in the AA. However, consumer loan distribution to low-income borrowers reflects poor penetration and is below the percentage of such households in the AA. LSA's lending to the low-income demographic is negatively impacted by strong competition resulting in LSA's low market share, and the number of households below the poverty level at 14.6 percent.

### *Residential Loans*

Based on Table P in Appendix C and the following performance context considerations, we concluded the borrower distribution of home mortgage loans is reasonable.

The residential loan distribution among moderate-income borrowers reflects reasonable penetration in comparison to the aggregate percentage of such households in the AA and poor compared to demographics. Residential loan distribution to low-income borrowers reflects poor penetration compared to demographics, but is reasonable in comparison with aggregate data with the percentage of such households in the AA. LSA's ability to originate safe-and-sound residential loans to low- and moderate-income borrowers is limited in the AA due to LSA's low market share from significant competition, low affordable housing inventory, and the county's high poverty level. The percentage of families below the poverty level (10 percent) within the bank's AA contributes to the lower level of lending compared to the percent of low-income families in the AA. Currently, Bourbon County has minimal affordable housing inventory for low- and moderate income borrowers. Many of the available, affordable housing options comprise homes that are old and dilapidated, which is consistent with the demographic data reporting vacant housing units at 19 percent. The 2016 demographic data reports 22.67 percent of housing in the AA consists of rental units. The reports also reflects affordable rental costs with a weighted average monthly gross rent at \$543, which only exceeds 30 percent gross income for 6 percent of the lessee population. The City of Fort Scott has implemented initiatives to provide affordable rental units and subsidized housing, which makes home ownership a less cost-effective means of housing for the low- and moderate-income demographic. The City of Fort Scott affordable housing initiatives included five low-income and subsidized apartment complexes consisting of 367 units.

## **Geographic Distribution of Loans**

The overall geographic distribution of loans is poor. The distribution of consumer and residential real estate loans reflects poor dispersion overall in the AA.

### *Consumer Loans*

Refer to Table U in appendix C for the data used to evaluate the geographic distribution of consumer loans.

The geographic distribution of consumer loans in LSA's AA reflects poor dispersion. The analysis reflects lending in all CTs in the AA; however, lending within the moderate-income geography is lower than the percentage of households in the geography. The institution's loans sampled totaled 16.00 percent in the moderate-income tract, which is below the percent of households at 22.20 percent.

### *Residential Loans*

Refer to Table O in appendix C for the data used to evaluate the geographic distribution of home mortgage loans.

LSA's geographic distribution of residential loans within the AA reflects poor performance. LSA's lending performance within the moderate-income tract falls below the aggregate level. Although opportunities to provide residential real estate loans are limited due to the affordable housing initiatives by the City of Fort Scott and low housing inventory, LSA's performance at 11.1 percent is significantly below the aggregate level at 25.1 percent.

## **Responses to Complaints**

LSA has not received any complaints during the evaluation period relating to its CRA performance.

## Appendix A: Scope of Examination

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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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2015 to 12/31/2017	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Liberty Savings Association (LSA) Fort Scott, Kansas	Consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
All Census Tracts in Bourbon County, Kansas (9556, 9557, 9558, 9559, 9560)	Full-Scope	See Appendix B for additional information.

## Appendix B: Community Profiles for Full-Scope Areas

### Bourbon County, Kansas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Bourbon County Non-MSA AA 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0.0	20.0	80.0	0.0	0.0
Population by Geography	15,173	0.0	22.4	77.6	0.0	0.0
Housing Units by Geography	7,202	0.0	20.8	79.2	0.0	0.0
Owner-Occupied Units by Geography	4,355	0.0	19.7	80.3	0.0	0.0
Occupied Rental Units by Geography	1,478	0.0	29.8	70.2	0.0	0.0
Vacant Units by Geography	1,369	0.0	14.8	85.2	0.0	0.0
Businesses by Geography	781	0.0	16.4	83.6	0.0	0.0
Farms by Geography	101	0.0	9.9	90.1	0.0	0.0
Family Distribution by Income Level	4,011	22.2	22.0	23.5	32.2	0.0
Household Distribution by Income Level	5,833	26.7	17.6	18.3	37.5	0.0
Median Family Income Non-MSAs - KS		\$52,419	Median Housing Value			\$75,272
			Median Gross Rent			\$543
			Families Below Poverty Level			9.8%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

LSA's AA includes all of Bourbon County, Kansas, which includes four middle-income CTs (9556, 9557, 9558, and 9559) and one moderate-income CT (9560). LSA operates one branch in the AA. The AA is not located in an MSA. Demographic data shows the 2016 MFI for non-MSAs in the state of Kansas is \$52,419, and 9.8 percent of households in the AA reported income below the poverty level.

Primary industries in the AA include manufacturing, commercial printing, healthcare, and education. The AA's largest employers include Peerless Products Inc., Ward Kraft Inc., USD 234, and Mercy Hospital. The unemployment rate in the AA is 4.8 percent compared to 3.6 percent for the state of Kansas and 3.9 percent nationally.

Based on loan originations during the evaluation period, the primary products for LSA are residential real estate and consumer loans. Competition in the AA is strong. LSA holds 9.3 percent of the deposit market share, which ranks 5<sup>th</sup> out of the six institutions in the AA. The top four competitors, including: Landmark National Bank, UMB Bank, Union State Bank, and The City Bank, hold 90.13 percent of the AA's deposit market share.

During the examination, we reviewed one community contact. The contact was a local real estate broker. The contact indicated that new residential construction is limited, and the majority of new construction is custom rather than speculative. As a result, home improvement lending is the community's most significant credit need. The contact felt that local financial institutions appropriately meet the credit needs of the community, and the contact was not aware of any complaints or discrimination regarding local financial institutions.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of 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; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - 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 aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - 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 aggregate peer data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – 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 throughout those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - 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 households by income level in each MA/assessment area.



**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Bourbon County Non-MSA AA 2015-2016	24	2,124	100	203	0.0	0.0	0.0	19.7	11.1	25.1	80.3	88.9	74.9	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, due to rounding, totals may not equal 100.0.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bourbon County Non-MSA AA 2015-2016	24	2,124	100	167	22.2	5.6	13.2	22.0	11.1	19.2	23.5	33.3	21.6	32.2	50.0	22.8	0.0	0.0	23.4

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 HMDA Aggregate Data, due to rounding, totals may not equal 100.0.

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Bourbon County Non-MSA AA 2015-2016	30	366	100	0.0	0.0	22.2	16.0	77.8	84.0	0.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, due to rounding, totals may not equal 100.0.

**Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2015-16**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Bourbon County Non-MSA AA 2015-2016	30	366	100	26.7	12.0	17.6	24.0	18.3	8.0	37.5	56.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, due to rounding, totals may not equal 100.0.