Liberty Bank and Trust Company

CRA Public File



Liberty Bank and Trust Company Public Comments

There have been no written public comments for current year 2024 or previous years 2023 and 2022

CRA Performance Evaluation

PUBLIC DISCLOSURE

September 5, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Liberty Bank and Trust Company Certificate Number: 20856

6600 Plaza Drive New Orleans, Louisiana 70127

Federal Deposit Insurance Corporation Division of Depositor and Consumer Protection Dallas Regional Office

> 600 North Pearl Street, Suite 700 Dallas, Texas 75201

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, 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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DESCRIPTION OF INSTITUTION

Liberty Bank and Trust Company (LBTC), established in 1972, maintains its headquarters in New Orleans, Louisiana. Liberty Financial Services, Inc., located in New Orleans, Louisiana, wholly owns LBTC. No affiliates or subsidiaries exist relevant to this CRA evaluation, as the institution did not ask for consideration of the activities from such. LBTC received a "Satisfactory" rating at its previous FDIC performance evaluation, dated September 8, 2020, based on the Federal Financial Institutions Examination Council (FFIEC) Intermediate Small Institution CRA Examination Procedures.

LBTC functions as a retail bank with a primary business focus, unchanged since the prior evaluation, on commercial and home mortgage lending. In October 2021, the bank acquired Tri-State Bank of Memphis, Tennessee, which involved one office. The institution operates fourteen full-service offices in eight states. In July 2022, LBTC closed a full-service office in Louisville, Kentucky. In October 2022, LBTC relocated a full-service office in Kansas City, Kansas. The bank also operates three loan production offices (LPOs) in Atlanta, Georgia (opened in November 2022); Houston, Texas; and Vicksburg, Mississippi.

The institution offers a variety of loan products, including home mortgage, commercial, and consumer loans. It also provides a variety of deposit services, including checking, savings, and certificate of deposit accounts. Service hours include extended lobby and drive-thru hours on Fridays at most locations as well as limited lobby and drive-thru hours on Saturdays at some locations. Alternative banking services include online and mobile banking, online bill pay, and 30 bank-owned automated teller machines (ATMs).

As of the June 30, 2023, Reports of Condition and Income, assets totaled \$1.1 billion, total loans equaled \$557.7 million, and deposits totaled \$949.6 million. Since the prior evaluation, on average per year, total assets increased 15.4 percent, net loans increased 11.0 percent, and total deposits increased 16.4 percent. The following table shows a distribution supportive of the institution's primary business focus with commercial loans representing the largest portion of the loan portfolio followed closely by home mortgage loans.

Description of Assessment Areas							
Assessment Area	Counties/Parishes in Assessment Area	# of CTs	# of Branches				
Kansas City Multi-State MSA	Wyandotte - Kansas Jackson - Missouri	291	2				
Alabama							
Montgomery MSA	Lowndes, Montgomery	75	1				
Alabama Non-MSA	Macon	12	1				
Illinois							
Chicago MSA	Cook	1,332	1				
Louisiana							
Baton Rouge MSA	East Baton Rouge	108	2				
New Orleans MSA	Jefferson, Orleans	312	4				
Michigan							
Detroit MSA	Wayne	627	1				
Mississippi							
Jackson MSA	Hinds	67	1				
Tennessee							
Memphis MSA	Shelby	249	1				
Source: Bank Data							

SCOPE OF EVALUATION

General Information

Examiners evaluated performance based on FFIEC Intermediate Small Institution CRA Examination Procedures, which include the Lending Test and Community Development Test. The appendix details each tests' criteria. This evaluation covers the period from the previous evaluation dated September 8, 2020, to the current evaluation dated September 5, 2023.

Examiners applied full-scope procedures to the following AAs: the Kansas City Multi-State MSA, Montgomery MSA, Chicago MSA, New Orleans MSA, Detroit MSA, Jackson MSA, and Memphis MSA. Examiners applied limited-scope procedures to the Alabama Non-MSA and Baton Rouge MSA AAs. Please refer to the rated area sections for additional details.

The following table shows that the bank originated a majority of its loans, deposits, and branches in the State of Louisiana. Consequently, examiners weighed records in the State of Louisiana heaviest when arriving at applicable conclusions and ratings.

calendar years since the prior evaluation.

- 2020 276 such loans totaling \$66.2 million,
- 2021 265 such loans totaling \$64.5 million, and
- 2022 182 such loans totaling \$49.4 million

Examiners did not identify any trends between the different years considered that materially affect conclusions, unless otherwise noted. Therefore, this evaluation presents information for 2022, the most recent year for which aggregate data exists as of this evaluation date. U.S. Census data for 2020, as well as HMDA aggregate data, provide the standards of comparison for the reviewed home mortgage loans.

This evaluation also includes a review of the universe of 207 small business loans totaling \$36.7 million originated in 2022, the most recent calendar year of available data. Examiners considered the reviewed loans representative of the entire evaluation period. D&B data for 2022 provides a standard of comparison for the reviewed small business loans. Within the New Orleans MSA assessment area, however, examiners utilized a random sample of 38 small business loans totaling \$7.9 million for the borrower profile analysis.

In addition, this evaluation includes a review of the universe of 227 consumer loans totaling \$2.8 million originated in 2022, the most recent calendar year of available data. Examiners considered the reviewed loans representative of the entire evaluation period. U.S. Census data for 2020 provides a standard of comparison for the reviewed consumer loans.

Examiners considered the universes of the dollar volume and number of loans originated for the loan categories reviewed, as well as management's stated business strategy, to determine the weighting applied when evaluating the applicable performance factors. The following table shows that, of the loan categories reviewed, home mortgage loans comprise a majority by dollar volume. As the different assessment areas have varied credit needs, examiners reviewed different loan products in each assessment area. However, examiners generally weighed home mortgage loans heavier than small business and consumer loans when arriving at applicable conclusions, unless otherwise noted.

Loan Products Reviewed							
Loan Category	Un	iverse	Rev	iewed			
	#	\$(000s)	#	\$(000s)			
Home Mortgage	276	66,228	276	66,228			
Small Business	207	36,745	207	36,745			
Consumer	227	2,834	227	2,834			

For the Community Development Test, this evaluation considers applicable current period CD activities, including CD loans, QIs, and CD services. Current period activities involve those generated since the previous September 8, 2020, evaluation. This test further encompasses all prior period QIs. Prior period QIs involve those purchased prior to the previous evaluation but remain

	N	umber	of Loans		Total	Dollar A	mount	of Loans \$	(000s)	
#	Insi	de	Outs	Outside		Insid	le	Outsi	de	Total \$(000s)
	#	%	#	%	#	\$	%	\$	%	φ(σσσσ
Home Mortgage										-
2020	182	65.9	94	34.1	276	42,447	64.1	23,781	35.9	66,228
2021	160	60.4	105	39.6	265	35,630	55.3	28,833	44.7	64,462
2022	103	56.6	79	43.4	182	27,164	55.0	22,194	45.0	49,358
Subtotal	445	61.5	278	38.5	723	105,241	58.5	74,808	41.5	180,048
Small Business	153	73.9	54	26.1	207	21,930	59.7	14,815	40.3	36,745
Consumer	175	77.1	52	22.9	227	2,002	70.6	832	29.4	2,834

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the assessment areas for the bank as a whole. Excellent records in the States of Louisiana, Illinois, Michigan, and Tennessee outweighed reasonable records in the Kansas City Multi-State MSA and the States of Alabama and Mississippi to support this conclusion. Examiners considered the bank's performance relative to the available comparative data and any performance context issues. They focused on the percentage by number of loans in low- and moderate-income geographies within the assessment areas when arriving at conclusions.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income) for the bank as a whole. Reasonable records in all rated areas support this conclusion. Examiners considered the bank's performance relative to the available comparative data and any performance context issues. They focused on the percentage by number of loans to businesses with gross annual revenue of \$1 million or less and to low- and moderate-income individuals within the assessment area when arriving at conclusions.

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

The institution's CD performance demonstrates adequate responsiveness to CD needs in its assessment areas through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the institution's

- Affordable Housing The bank originated two loans totaling \$10.0 million loan to build apartment complexes that provide rental rates below the Department of Housing and Urban Development's fair market rents for the area. Thus, the activity provides affordable housing primarily to low- and moderate-income families.
- Revitalize or Stabilize The bank originated a \$5.0 million loan to fund the creation of a community grocery store in a low-income census tract. Thus, the activity revitalizes and stabilizes qualifying geographies by helping to attract new, or retain existing, businesses or residents.

Qualified Investments

The bank made use of 53 QIs totaling \$9.8 million. This reflects a decrease by number and an increase by dollar amount from the 60 QIs totaling \$6.5 million reported at the previous evaluation. The total dollar amount equates to 1.0 percent of average total assets since the prior evaluation and 3.4 percent of average securities of \$285.8 million for the same period. These levels reflect a decrease from the 1.1 percent of average total assets and equal the 3.4 percent of average securities reported at the previous evaluation. The responsiveness of the QIs addresses identified needs of the assessment area primarily for revitalization or stabilization efforts. The following tables illustrate the bank's QIs by rated area, year, and purpose.

	Quali	fied In	vestments	by Ra	ted Area				
		Community Services		Economic Development		Revitalize or Stabilize		Totals	
#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
0	0	2	252	0	0	5	1,642	7	1,894
0	0	1	1	0	0	0	0	1	1
0	0	0	0	0	0	0	0	0	0
6	10	10	44	4	24	9	4,716	29	4,794
0	0	2	479	0	0	0	0	2	479
0	0	2	1	0	0	2	502	4	503
0	0	5	1,601	0	0	0	0	5	1,601
0	0	5	561	0	0	0	0	5	561
6	10	27	2,939	4	24	16	6,860	53	9,833
	# 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Affordable Housing # \$(000s) 0 0 0 0 0 0 6 10 0 0 0 0 0 0 0	Affordable Housing Consequence # \$(000s) # 0 0 2 0 0 1 0 0 0 6 10 10 0 0 2 0 0 2 0 0 5 0 0 5	Affordable Housing Community Services # \$(000s) # \$(000s) 0 0 2 252 0 0 1 1 0 0 0 0 6 10 10 44 0 0 2 479 0 0 2 1 0 0 5 1,601 0 0 5 561	Affordable Housing Community Services Ecope Development # \$(000s) # \$(000s) # 0 0 2 252 0 0 0 1 1 0 0 0 0 0 0 0 0 0 6 10 10 44 4 4 0 0 2 479 0 0 0 2 1 0 0 0 5 1,601 0 0 0 5 561 0	Housing Services Development # \$(000s) # \$(000s) 0 0 2 252 0 0 0 0 1 1 0 0 0 0 0 0 0 0 6 10 10 44 4 24 0 0 2 479 0 0 0 0 2 1 0 0 0 0 5 1,601 0 0 0 0 5 561 0 0	Affordable Housing Community Services Economic Development Revious St # \$(000s) # \$(000s) # \$(000s) # 0 0 2 252 0 0 5 0 0 1 1 0 0 0 0 0 0 0 0 0 0 6 10 10 44 4 24 9 0 0 2 479 0 0 0 0 0 2 1 0 0 2 0 0 5 1,601 0 0 0 0 0 5 561 0 0 0	Affordable Housing Community Services Economic Development Revitalize or Stabilize # \$(000s) # \$(000s) # \$(000s) # \$(000s) 0 0 2 252 0 0 5 1,642 0 0 1 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 6 10 10 44 4 4 24 9 4,716 479 0 0 0 0 0 0 0 0 0 0 0 2 479 0 0 0 0 0 0 0 0 0 0 0 0 0 2 1 0 0 0 2 502 0 0 0 0 0 0 0 5 1,601 0 0 0 0 0 0 0 0 0 0 5 561 0 0 0 0 0 0 0	Affordable Housing Community Services Economic Development Revitalize or Stabilize Textonomic Stabilize # \$(000s) # \$(000s) # \$(000s) # \$(000s) # 0 0 2 252 0 0 5 1,642 7 0 0 1 1 0 0 0 0 1 0 0 0 0 0 0 0 0 0 6 10 10 44 4 24 9 4,716 29 0 0 2 479 0 0 0 0 2 0 0 2 1 0 0 2 502 4 0 0 5 1,601 0 0 0 0 5 0 0 5 561 0 0 0 0 5

Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Kansas City Multi-State MSA	0	0	0	0	0
Alabama	1	0	6	0	7
Illinois	1	7	1	1	10
Louisiana	5	8	3	0	16
Michigan	0	0	1	0	1
Mississippi	4	3	0	0	7
Tennessee	0	1	1	0	2
Total	11	19	12	1	43

	Community De	velopment Ser Institution	vices by Year		
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020*	0	0	0	0	0
2021	0	9	1	0	10
2022	1	9	8	1	19
YTD 2023	10	1	3	0	14
Total	11	19	12	1	43
Source: Bank data. *Since the	prior evaluation.				

LBTC also provides retail banking services that benefit low- and moderate-income individuals or areas. The following table shows the bank operates more than half of its branches and nearly half of its ATMs in low- and moderate-income census tracts.

	Branc	h and AT	M Distributio Insti	n by Geog tution	raphy In	come Level		
Tract Income	Census	Tracts	Popula	tion	Bra	nches	A ^r	ΓMs
Level	#	%	#	%	#	%	#	%
Low	538	16.3	1,511,323	13.2	4	28.6	7	23.3
Moderate	900	27.4	3,154,470	27.6	4	28.6	7	23.3
Middle	839	25.5	3,318,256	29.0	5	35.7	6	20.0
Upper	867	26.4	3,321,388	29.0	1	7.1	7	23.3
NA	145	4.4	130,925	1.2	0	0.0	3	10.0
Total	3,289	100.0	11,436,362	100.0	14	100.0	30	100.0
Source: U.S. Census 1	Data (2020); Ba	nk data.		,		•		

Furthermore, the bank also provides alternative delivery systems that help avail the bank's services to low- and moderate-income individuals or geographies. Those systems include the bank's ATMs, nearly half of which are located in low- and moderate-income census tracts. Besides its ATMs, the

KANSAS CITY MULTI-STATE MSA – Full-Scope Review

CRA RATING FOR KANSAS CITY MULTI-STATE MSA: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KANSAS CITY MULTI-STATE MSA

The Kansas City Multi-State MSA Assessment Area (Kansas City MS MSA AA), unchanged since the prior evaluation, consists of the following contiguous census tracts in the following contiguous counties. The counties represent two of fourteen counties that comprise the Kansas City, Missouri-Kansas MS MSA located in west Missouri and east Kansas.

- Jackson County, MO all census tracts
- Wyandotte County, KS all census tracts

The following table shows that the bank operates two full-service offices and ATMs in this assessment area. The offices maintain hours consistent with the area and the industry.

Full-Service Office Locations Kansas City MS MSA AA							
County/City/Street	Office Type	Census Tract Number	Census Tract Income Level	ATM	Office Opened or Closed Since Last Evaluation		
Jackson County, MO: Kansas City – Troost Ave Wyandotte County, KS:	Branch	0075.00	Moderate	Yes	No		
Kansas City – State Ave	Branch	0439.03	Low	Yes	Yes – opened Oct 2022		
Kansas City – N 5 th St	Branch	0411.00	Low	Yes	Yes – closed Oct 2022		

Economic and Demographic Data

During the evaluation period, the income classifications of the census tracts within the assessment area changed. According to 2015 ACS data, the assessment area's 269 census tracts reflect the following income designations: 76 low-, 75 moderate-, 65 middle-, 38 upper-income census tracts, and 15 census tracts with no income designation. According to 2020 U.S. Census data, the assessment area's 291 census tracts reflect the following income designations: 53 low-, 99 moderate-, 80 middle-, 41 upper-income census tracts, and 18 census tracts with no income designation. The Federal Emergency Management Agency (FEMA) declared this area as a major disaster area during the entire period under review. The following table illustrates select demographic characteristics of the assessment area.

Credit and Community Development Needs and Opportunities

Considering information from bank management, as well as demographic and economic data, examiners determined that home mortgage, consumer, and small business loans represent primary credit needs in the assessment area.

Regarding the area's CD needs, demographic data showing that 52.2 percent of the area's census tracts received low- or moderate-income designations and the federal disaster area designations suggest a need for activities that revitalize or stabilize qualifying geographies. In addition, the demographic data showing lower percentages of owner-occupied housing units relative to total housing units in low- and moderate-income geographies, in connection with the 48.6 percent of the area's families reporting low or moderate incomes, also suggests a need for affordable housing. The percentage of low- and moderate-income families also suggests a need for activities that benefit projects or organizations that provide community services targeted to those families. The area's businesses suggest a need for economic development activities, such as those that finance smaller sized entities that support permanent job creation, retention, or improvement for low- or moderate-income persons or geographies.

SCOPE OF EVALUATION – KANSAS CITY MULTI-STATE MSA

Examiners considered the same review period as discussed at the institution level. Examiners also reviewed small business, home mortgage, and consumer loans in this rated area. Small business lending received the greatest weight when arriving at overall conclusions for the Kansas City MS MSA AA because of its greater relative number and dollar volume of loans. Regarding the CD Test, the scope for this rated area remains consistent with that of the institution as a whole. Refer to the institution level Scope of Evaluation section for additional information.

CONCLUSIONS ON PERFORMANCE CRITERIA IN KANSAS CITY MULTI-STATE MSA

LENDING TEST

LBTC demonstrated a satisfactory record regarding the Lending Test in the Kansas City MS MSA AA. Reasonable geographic distribution and borrower profile support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Kansas City MS MSA AA. Reasonable records regarding small business, home mortgage, and consumer loans support this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the Kansas City MS MSA AA. Reasonable performance in moderate-income geographies insufficiently lifted by excellent performance in low-income geographies supports this conclusion. The following table shows that, in low-income census tracts, the bank's level of lending is 50.0 percentage points

Geographic Distribution of Consumer Loans Kansas City MS MSA AA							
Tract Income Level	% of Households	#	%	\$(000s)	%		
Low	14.9	3	37.5	28	51.9		
Moderate	36.8	3	37.5	7	13.0		
Middle	31.4	2	25.0	19	35.1		
Upper	15.2	0	0.0	0	0.0		
NA	1.6	0	0.0	0	0.0		
Total	100.0	8	100.0	54	100.0		
Source: U.S. Census D	Pata (2020); Bank Data		•	-			

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income) in the Kansas City MS MSA AA. Excellent records regarding small business and consumer loans lowered by a very poor record regarding home mortgage loans support this conclusion.

Small Business Loans

The distribution of borrowers reflects, given the demographics of the assessment area, excellent penetration among businesses of different sizes in the Kansas City MS MSA AA. Excellent performance to businesses with gross annual revenue of \$1 million or less supports this conclusion. The following table shows that the bank originated all of the loans to businesses with gross annual revenues of \$1 million or less, thereby reflecting an excellent level.

Distribution of	Small Business I Kansas	Loans by Gi City MS M		devenue Categ	ory
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	72.5	7	70.0	514	52.7
\$100,000 - \$249,999	13.5	1	10.0	26	2.7
\$250,000 - \$499,999	3.3	0	0.0	0	0.0
\$500,000 - \$1,000,000	1.8	2	20.0	435	44.6
Subtotal ≤ \$1,000,000	91.1	10	100.0	975	100.0
> \$1,000,000	2.9	0	0.0	0	0.0
Revenue Not Available	6.0	0	0.0	0	0.0
Total	100.0	10	100.0	975	100.0

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the assessment area, very poor penetration among individuals of different income levels in the Kansas City MS MSA AA. Very poor performances to low- and moderate-income borrowers support this conclusion. The following

Community Development Loans

As noted in the institution level section, the bank originated 11 CD loans totaling nearly \$8.3 million in the Kansas City MS MSA AA. These levels reflect a decrease by number and an increase by dollar amount over the 18 loans totaling \$3.5 million in this AA at the prior evaluation. The current dollar amount equates to 11.3 percent of the bank's total CD loans compared to this rated area contributing 2.6 percent of the bank's total dollar volume of loans. The responsiveness of the loans address identified needs in the assessment area primarily targeted to revitalization and stabilization efforts but also benefit economic development and community services.

The following points are examples of the bank's CD loans in the Kansas City MS MSA AA:

- Revitalize or Stabilize The bank renewed a loan for \$1.2 million originally made to construct a building addition in a low-income census tract. Thus, the activity revitalizes and stabilizes qualifying geographies by helping to attract new, or retain existing, businesses or residents.
- *Economic Development* The bank originated a \$5.0 million loan to finance a micro loan fund to assist small businesses. Thus, the activity promotes economic development by assisting businesses that meet the size eligibility standards of the regulation and that support permanent job creation, retention, or improvement for low- or moderate-income persons or in low- and moderate-income geographies.

Qualified Investments

As noted in the institution level section, the bank made use of 7 QIs totaling nearly \$1.9 million in the Kansas City MS MSA AA. This reflects a slight increase from the 5 QIs totaling \$1.6 million in this AA at the prior evaluation. The current dollar amount equates to 19.3 percent of the bank's total QIs compared to this rated area containing 4.3 percent of the bank's total deposits. The responsiveness of the QIs addresses identified needs of the assessment area primarily for revitalization or stabilization.

The following points are examples of the bank's QIs in the Kansas City MS MSA AA:

- Revitalize or Stabilize The bank continued its investments in four municipal bonds totaling \$1.6 million. The bonds improved sewers, public utilities, and other public infrastructure in an area where a majority of the census tracts are designated as low- and moderate-income. Thus, the activity revitalizes and stabilizes qualifying geographies by helping to attract new, or retain existing, businesses or residents.
- Community Services The bank continued its investment of \$251,116 in a money market deposit account at a CDFI that provides affordable financial services to low- and moderate-income individuals and in economically distressed areas. Thus, the activity benefits organizations or projects that provide community services primarily to low- and moderate-income individuals.

STATE OF ALABAMA

CRA RATING FOR ALABAMA: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

As noted at the institution level, LBTC designated two assessment areas in the State of Alabama: the Montgomery MSA AA and the Alabama Non-MSA AA. Refer to the individual assessment area sections for additional details.

SCOPE OF EVALUATION – ALABAMA

Examiners considered the same review period and same lending products discussed at the institution level. However, home mortgage lending did not comprise a primary lending focus in the Alabama Non-MSA AA; therefore, examiners drew conclusions for this assessment area based on small business and consumer lending performance. Small business lending received the greatest weight when arriving at overall conclusions for the State of Alabama because of its greater relative number and dollar volume of loans. Regarding the CD Test, the scope for this rated area remains consistent with that of the institution as a whole. Refer to the institution level Scope of Evaluation section for additional information.

The following table shows that the Montgomery MSA AA generated a significant percentage of the bank's loans and deposits in the State of Alabama. Consequently, examiners weighed performance in the Montgomery MSA AA heaviest when arriving at applicable conclusions and ratings for this rated area.

Ass	sessment Area B		f Loans, Depo pama	sits, and Brar	iches	
	Loa	ns	Depo	osits	Bra	inches
Assessment Area	\$(000s)	%	\$(000s)	%	#	%
Montgomery MSA	1,160	62.9	49,075	62.0	1	50.0
AL Non-MSA	685	37.1	30,039	38.0	1	50.0
Total	1,845	100.0	79,114	100.0	2	100.00

CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA

LENDING TEST

LBTC demonstrated a satisfactory Lending Test record in the State of Alabama. Reasonable records regarding geographic distribution and borrower profile support this conclusion. The Montgomery MSA

The following points are examples of the bank's CD loans benefitting a broader statewide or regional area:

- *Revitalize or Stabilize* The bank renewed two loans totaling \$1.2 million originally made to purchase a strip mall located in a low-income census tract. Thus, the activity revitalizes and stabilizes qualifying geographies by helping to attract new, or retain existing, businesses or residents.
- *Affordable Housing* The bank participated nearly \$29,000 in a loan to finance a low-income housing apartment complex. Thus, the activity provides affordable housing primarily to low- and moderate-income families.

Qualified Investments

The following table shows the bank made use of 1 QI totaling \$1,000 in the State of Alabama. This reflects a decrease from the 4 QIs totaling \$4,000 in this rated area at the prior evaluation. The current dollar amount equates to less than 0.1 percent of the bank's total QIs compared to this rated area containing 8.5 percent of the bank's total deposits.

		Qualifie	ed Invo	estments b Alaban	•	ssment Ar	ea			
Assessment Area		ordable ousing		nmunity ervices		onomic elopment		italize or abilize	Т	otals
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Montgomery MSA	0	0	1	1	0	0	0	0	1	1
Alabama Non-MSA	0	0	0	0	0	0	0	0	0	0
Total	0	0	1	1	0	0	0	0	1	1
Source: Bank Data										

Community Development Services

The following table shows that the bank provided 7 CD services in this rated area since the prior evaluation. This level reflects a slight decrease over the 8 CD services at the prior evaluation. The current figure represents 16.3 percent of the bank's total CD services, compared to this rated area containing 14.3 percent of the bank's total branches.

Com	nmunity Developm	ent Services b Alabama	y Assessment	Area	
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Montgomery MSA	1	0	6	0	7
Alabama Non-MSA	0	0	0	0	0
Total	1	0	6	0	7
Source: Bank Data					

assessment area's 75 census tracts reflect the following income designations: 12 low-, 22 moderate-, 21 middle-, 18 upper-income census tracts, and 2 census tracts with no income designation. FEMA declared this area as a major disaster area during the majority of the period under review. The following table illustrates select demographic characteristics of the assessment area.

Demogra	•	nation of tomery MS	he Assessme SA AA	nt Area		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	75	16.0	29.3	28.0	24.0	2.7
Population by Geography	239,265	11.0	33.4	26.8	27.8	1.0
Housing Units by Geography	110,314	12.6	34.2	27.0	24.7	1.4
Owner-Occupied Units by Geography	54,751	7.9	29.5	30.6	31.7	0.3
Occupied Rental Units by Geography	38,973	15.1	40.4	22.9	19.2	2.4
Vacant Units by Geography	16,590	22.5	35.3	25.0	14.5	2.7
Businesses by Geography	28,249	10.0	27.8	25.9	29.8	6.5
Farms by Geography	600	6.7	27.0	31.2	33.0	2.2
Family Distribution by Income Level	56,988	26.0	17.2	17.5	39.3	0.0
Household Distribution by Income Level	93,724	27.9	15.6	18.2	38.3	0.0
Median Family Income – Montgomery, AL MSA	\$6	8,115	Median Housing Value Median Gross Rent Families Below Poverty Level			\$129,617 \$919 14.9%

According to Moody's Analytics, major employers in the area include Maxwell/Gunter Air Force Base, Baptist Health, and Hyundai Motor Manufacturing Alabama. The U.S. Bureau of Labor Statistics reflects a July 2023 unemployment rate of 2.4 percent for the Montgomery MSA, which is below the 3.5 percent national and slightly above the 2.3 percent State of Alabama unemployment rates for the same period.

Examiners use the applicable FFIEC-updated MFI levels to analyze home mortgage and consumer loans under the borrower profile criterion. The following table shows the applicable income ranges based on the 2022 FFIEC-estimated MFI of \$75,500 for the Montgomery MSA.

Median Family Income Ranges – Montgomery MSA							
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%			
2022 (\$75,500)	<\$37,750	\$37,750 to <\$60,400	\$60,400 to <\$90,600	≥\$90,600			

lending by dollar volume in moderate-income tracts exceeds the demographic data by 19.9 percentage points.

	Geographic Distribution of Small Business Loans Montgomery MSA AA							
Tract Income Level	% of Businesses	#	%	\$(000s)	%			
Low	10.0	1	9.1	63	8.4			
Moderate	27.8	2	18.2	356	47.7			
Middle	25.9	3	27.3	225	30.2			
Upper	29.8	5	45.4	102	13.7			
NA	6.5	0	0.0	0	0.0			
Total	100.0	11	100.0	746	100.0			
Source: 2022 D&B Da	ta; Bank Data		•					

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the Montgomery MSA AA. Reasonable performance in moderate-income geographies outweighed poor performance in low-income geographies to support this conclusion. The following table shows that no loans originated in low-income census tracts, reflecting poor performance. The table further shows that, in moderate-income tracts, the bank's level of lending rises 78.9 percentage points higher than aggregate data, reflecting reasonable performance. Given the consideration of the greater percentage of owner-occupied housing units within moderate-income geographies, the reasonable performance for moderate-income geographies outweighed the poor performance in the low-income geographies.

Montgomery MSA AA Tract Income Owner-Occupied Aggregate Bank's Home Mortgage Loans							
Level	Housing Units (% of #)	Data (% of #)	#	%	\$(000s)	%	
Low	7.9	1.9	0	0.0	0	0.0	
Moderate	29.5	21.1	2	100.0	324	100.0	
Middle	30.6	30.9	0	0.0	0	0.0	
Upper	31.7	45.9	0	0.0	0	0.0	
NA	0.3	0.2	0	0.0	0	0.0	
Total	100.0	100.0	2	100.0	324	100.0	

Consumer Loans

The geographic distribution of consumer loans reflects reasonable dispersion throughout the Montgomery MSA AA. Excellent performance in moderate-income geographies sufficiently lifted poor performance in low-income geographies to support this conclusion. The following table shows that no loans originated in low-income census tracts, reflecting poor performance. The table further shows that, in moderate-income tracts, the bank's level of lending rises 41.0 percentage points higher than the demographic data, evidencing excellent performance.

shows that the bank did not originate any loans to low- or moderate-income borrowers, thereby reflecting a very poor level.

	1	Montgomer			σ	
Borrower Income	Families	Aggregate Data		Bank's Home I	Mortgage Loan	S
Level	(%)	(% of #)	#	%	\$(000s)	%
Low	26.0	8.6	0	0.0	0	0.0
Moderate	17.2	20.9	0	0.0	0	0.0
Middle	17.5	20.5	0	0.0	0	0.0
Upper	39.3	33.6	0	0.0	0	0.0
NA	0.0	16.5	2	100.0	324	100.0
Total	100.0	100.0	2	100.0	324	100.0

Consumer Loans

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels in the Montgomery MSA AA. Reasonable performances to low- and moderate-income borrowers support this conclusion. The following table shows that to low-income borrowers, the bank's level of lending falls 2.9 percentage points lower than demographic data, thereby reflecting a reasonable level. The table further shows that, to moderate-income borrowers, the bank's level of lending rises 34.4 percentage points above demographic data, reflecting an excellent level. Given the higher percentage of low-income households, examiners placed more weight on the bank's lending to low-income borrowers. As a result, the overall level of consumer loan originated to low- and moderate-income borrowers is reasonable.

Distribution of Consumer Loans by Borrower Income Level Montgomery MSA AA								
Borrower Income Level	% of Households	#	%	\$(000s)	%			
Low	27.9	1	25.0	14	15.5			
Moderate	15.6	2	50.0	15	16.7			
Middle	18.2	0	0.0	0	0.0			
Upper	38.3	1	25.0	61	67.8			
Total	100.0	4	100.0	90	100.0			

COMMUNITY DEVELOPMENT TEST

The institution's CD performance demonstrates adequate responsiveness to CD needs in the assessment area through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the Montgomery MSA AA.

The following points are examples of the bank's CD services in the Montgomery MSA AA:

- *Economic Development* A bank representative provided financial literacy to a small business development center. Thus, the activity promotes economic development by assisting an organization that aids businesses that meet the size eligibility standards of the regulation and that support permanent job creation, retention, or improvement for low- or moderate-income persons or in low- and moderate-income geographies.
- Affordable Housing A bank representative serves on a loan consortium that provides multi-family housing to low-income individuals. Thus, the activity helps provide affordable housing to low-income individuals.

As seen in the following table, the bank operates its only branch and ATM in a middle-income census tract in the assessment area. However, alternative delivery systems available throughout all portions of this assessment area remain consistent with those discussed previously at the institution level section.

	Branc	ch and ATN		on by Geog ery MSA A		come Level		
Tract Income	Censu	s Tracts	Popul	Population		nches	ATMs	
Level	#	%	#	%	#	%	#	%
Low	12	16.0	26,319	11.0	0	0.0	0	0.0
Moderate	22	29.3	79,960	33.4	0	0.0	0	0.0
Middle	21	28.0	64,080	26.8	1	100.0	1	100.0
Upper	18	24.0	66,469	27.8	0	0.0	0	0.0
NA	2	2.7	2,437	1.0	0	0.0	0	0.0
Total	75	100.0	239,265	100.0	1	100.0	1	100.0
Source: U.S. Census D	ata (2020); Ba	nk Data.						

ALABAMA NON-MSA – Limited-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA NON-MSA

The Alabama Non-MSA AA consists solely of Macon County, located in southeast Alabama. The bank operates one full-service branch and ATM in this assessment area.

During the evaluation period, the income classifications of the census tracts within the assessment area changed. According to 2015 ACS data, the assessment area's 12 census tracts reflect the following income designations: 0 low-, 4 moderate-, 5 middle-, 2 upper-income census tracts, and 1 census tract with no income designation. According to 2020 U.S. Census data, the assessment area's 12 census tracts reflect the following income designations: 1 low-, 4 moderate-, 4 middle-, and 3 upper-income census tracts. FEMA declared this area as a major disaster area during the majority of the period under review. The following table illustrates select demographic characteristics of the assessment area.

Consumer Loans

	Geographic Distribution of Consumer Loans Alabama Non-MSA AA							
Tract Income Level	% of Households	#	%	\$(000s)	%			
Low	5.6	0	0.0	0	0.0			
Moderate	38.3	1	16.7	30	46.9			
Middle	39.2	3	50.0	19	29.7			
Upper	17.0	2	33.3	15	23.4			
Total	100.0	6	100.0	64	100.0			
Source: U.S. Census D	Data (2020); Bank Data							

Borrower Profile

Small Business Loans

Distribution of	Small Business I Alaban	na Non-MS		tevenue Categ	,or y
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	58.0	1	25.0	46	7.4
\$100,000 - \$249,999	22.7	1	25.0	56	9.0
\$250,000 - \$499,999	4.4	0	0.0	0	0.0
\$500,000 - \$1,000,000	1.5	2	50.0	519	83.6
Subtotal $\leq $1,000,000$	86.6	4	100.0	621	100.0
> \$1,000,000	2.0	0	0.0	0	0.0
Revenue Not Available	11.4	0	0.0	0	0.0
Total	100.0	4	100.0	621	100.0

Consumer Loans

Dist	Distribution of Consumer Loans by Borrower Income Level Alabama Non-MSA AA								
Borrower Income Level	% of Households	#	%	\$(000s)	%				
Low	29.5	3	50.0	34	53.1				
Moderate	18.9	1	16.7	6	9.4				
Middle	16.1	2	33.3	24	37.5				
Upper	35.5	0	0.0	0	0.0				
Total	100.0	6	100.0	64	100.0				
Source: U.S. Census de	nta (2020); Bank data (20	122).							

STATE OF ILLINOIS - Full-Scope Review

CRA RATING FOR ILLINOIS: <u>SATISFACTORY</u>

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS

LBTC designated one assessment area in the State of Illinois: the Chicago Metropolitan Statistical Area Assessment Area (Chicago MSA AA). Since the prior evaluation, the bank expanded this assessment area to include Cook County in its entirety. The following county represents one of five counties that comprise the Chicago-Naperville-Evanston, IL MSA located in northeast Illinois.

• Cook County – all census tracts

The following table shows that the bank operates one full-service office and ATM in this assessment area. The offices maintain hours consistent with the area and the industry.

		rvice Office iicago MSA			
County/City/Street	Office Type	Census Tract Number	Census Tract Income Level	ATM	Office Opened or Closed Since Last Evaluation
Cook County: Forest Park – Roosevelt Rd	Branch	0081.61	Middle	Yes	No

Economic and Demographic Data

During the evaluation period, the income classifications of the census tracts within the assessment area changed. According to 2015 ACS data, the assessment area's 83 census tracts reflect the following income designations: 25 low-, 20 moderate-, 22 middle-, 15 upper-income census tracts, and 1 census tract with no income designation. According to 2020 U.S. Census data, the assessment area's 291 census tracts reflect the following income designations: 53 low-, 99 moderate-, 80 middle-, 41 upper-income census tracts, and 18 census tracts with no income designation. The following table illustrates select demographic characteristics of the assessment area.

Community Contact(s)

Examiners reviewed a previous contact with a community member knowledgeable of the area's economic, demographic, and business environment to help assess the current economic conditions, community credit needs, and potential opportunities for bank involvement in the area.

The contact stated that small business loans and start-up capital are significant needs within the area. The contact suggested that local banks could address these needs by funding loan pools. Financial institutions could also increase involvement by providing effective financial education to small business owners. The contact indicated that some of the larger financial institutions in the area are active in the community.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, as well as demographic and economic data, examiners determined that home mortgage and small business loans represent primary credit needs in the assessment area.

Regarding the area's CD needs, demographic data showing that 43.3 percent of the area's census tracts received low- or moderate-income designations and the federal disaster area designations suggest a need for activities that revitalize or stabilize qualifying geographies. In addition, the demographic data showing lower percentages of owner-occupied housing units relative to total housing units in low- and moderate-income geographies, in connection with the 44.2 percent of the area's families reporting low or moderate incomes, also suggests a need for affordable housing. The percentage of low- and moderate-income families also suggests a need for activities that benefit projects or organizations that provide community services targeted to those families. The area's businesses suggest a need for economic development activities, such as those that finance smaller sized entities that support permanent job creation, retention, or improvement for low- or moderate-income persons or geographies.

SCOPE OF EVALUATION – ILLINOIS

Examiners considered the same review period and same lending products discussed at the institution level. However, consumer lending did not comprise a primary lending focus in the State of Illinois; therefore, examiners drew conclusions for this AA based on home mortgage and small business lending performance. Home mortgage lending received the greatest weight when arriving at overall conclusions for the State of Illinois because of its greater relative number and dollar volume of loans. Regarding the CD Test, the scope for this rated area remains consistent with that of the institution as a whole. Refer to the institution level Scope of Evaluation section for additional information.

	(Chicago MS	A AA		
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	8.4	3	15.8	444	61.7
Moderate	20.5	2	10.5	198	27.5
Middle	28.4	0	0.0	0	0.0
Upper	42.0	14	73.7	78	10.8
NA	0.7	0	0.0	0	0.0
Total	100.0	19	100.0	720	100.0

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income) in the Chicago MSA AA. An excellent record regarding home mortgage loans lowered by a poor record regarding small business loans supports this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the assessment area, excellent penetration among individuals of different income levels in the Chicago MSA AA. Excellent performances to low- and moderate-income borrowers support this conclusion. The following table shows that, to low-income borrowers, the bank's level of lending rises 20.7 percentage points higher than aggregate data, thereby reflecting an excellent level. The table further shows that, to moderate-income borrowers, the bank's level of lending rises 17.3 percentage points higher than aggregate data, also reflecting an excellent level.

1011		f Home Mortgage I Chicago	MSA AA			
Borrower Income	Families	Aggregate Data		Bank's Home I	Mortgage Loans	S
Level	(%)	(% of #)	#	%	\$(000s)	%
Low	27.3	10.1	4	30.8	601	26.6
Moderate	16.9	21.1	5	38.4	1,043	46.1
Middle	18.1	19.5	2	15.4	281	12.4
Upper	37.7	31.2	2	15.4	338	14.9
NA	0.0	18.2	0	0.0	0	0.0
Total	100.0	100.0	13	100.0	2,263	100.0

Small Business Loans

The distribution of borrowers reflects, given the demographics of the assessment area, poor penetration among businesses of different sizes in the Chicago MSA AA. Poor performance to businesses with gross annual revenue of \$1 million or less supports this conclusion. The following table shows that the bank only originated two out of every ten loans to businesses with gross annual

Qualified Investments

As noted in the institution level section, the bank did not make use of any QIs in the State of Illinois, despite containing 3.7 percent of the bank's total deposits. This reflects a decrease from the 3 QIs totaling \$9,000 in this assessment area at the prior evaluation.

Community Development Services

As noted in the institution level, the bank provided 10 CD services in the State of Illinois. This figure reflects a decrease from the 40 services at the prior evaluation. The current level represents 23.3 percent of the bank's total CD services whereas the State of Illinois contains 7.1 percent of the bank's total branches. The services involve bank personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. Although not particularly responsive, these activities primarily benefit community services.

The following points are examples of the bank's CD services in the Chicago MSA AA:

- *Community Services* A bank representative taught financial literacy classes at a school where the majority of students are low- and moderate-income individuals. Thus, the activity benefits organizations or projects that provide community services primarily to low- and moderate-income individuals.
- *Community Services* A bank representative provided financial education to a center that offers low- to moderate-income residents professional housing counseling assistance. Thus, the activity benefits organizations or projects that provide community services primarily to low- and moderate-income individuals.

As seen in the following table, the bank operates its only branch and ATM in a middle-income census tract in the assessment area. However, alternative delivery systems available throughout all portions of this assessment area remain consistent with those discussed previously at the institution level section.

			M Distribution Chicago	MSA AA				
Tract Income	Census	Tracts	Popula	ation	Bra	nches	\mathbf{A}'	ГMs
Level	#	%	#	%	#	%	#	%
Low	225	16.9	704,469	13.4	0	0.0	0	0.0
Moderate	351	26.3	1,416,283	26.8	0	0.0	0	0.0
Middle	369	27.7	1,605,841	30.4	1	100.0	1	100.0
Upper	371	27.9	1,521,788	28.9	0	0.0	0	0.0
NA	16	1.2	27,160	0.5	0	0.0	0	0.0
Total	1,332	100.0	5,275,541	100.0	1	100.0	1	100.0

this conclusion. The New Orleans and Baton Rouge MSA AAs demonstrated consistent performance. Examiners placed more weight on the bank's performance in the New Orleans MSA AA.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the assessment areas in the State of Louisiana. Excellent performance in the New Orleans MSA outweighed reasonable performance in the Baton Rouge MSA AA to support this conclusion. Examiners placed more weight on the bank's performance in the New Orleans MSA AA.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes in the State of Louisiana. Reasonable performances in the New Orleans MSA and Baton Rouge MSA AAs support this conclusion. Examiners placed more weight on the bank's performance in the New Orleans MSA AA.

COMMUNITY DEVELOPMENT TEST

The institution's CD performance demonstrates adequate responsiveness to CD needs in the assessment areas through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the State of Louisiana. The New Orleans MSA AA demonstrated consistent performance, while the Baton Rouge MSA AA demonstrated inconsistent performance. Examiners placed more weight on the bank's performance in the New Orleans MSA AA.

Community Development Loans

The following table shows that, since the prior evaluation, the bank originated 38 CD loans totaling over \$28.4 million in the State of Louisiana. This level reflects an increase over the 15 CD loans totaling \$12.5 million in this rated area at the prior evaluation. The current dollar amount equates to 38.7 percent of the bank's total CD loans compared to this rated area contributing 69.4 percent of the dollar volume of the bank's total loans.

	Cor	nmunity I	Devel o	pment Ler	iding 1	by Assessm	ient Ai	·ea		
				Louisia	na					
Assessment Area		ordable ousing			Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Baton Rouge MSA	1	110	0	0	0	0	3	208	4	318
New Orleans MSA	0	0	0	0	1	4,000	32	24,083	33	28,083
Regional Activities	0	0	0	0	0	0	1	40	1	40
Total	1	110	0	0	1	4,000	36	24,331	38	28,441
Source: Bank Data										

•		y Assessment	Area	
Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
#	#	#	#	#
1	0	2	0	3
4	8	1	0	13
5	8	3	0	16
	Affordable	Louisiana Affordable Community Housing Services	Louisiana Affordable Community Economic Housing Services Development	Affordable Community Economic Revitalize Housing Services Development or Stabilize

Additionally, the bank's retail banking services benefit low- and moderate-income individuals and areas. As seen in the following table, the bank operates half of its branches and over 40 percent of its ATMs in low- and moderate-income census tracts in the assessment area. Alternative delivery systems available throughout all portions of this assessment area remain consistent with those discussed previously at the institution level section.

			Lou	isiana				
Tract Income	Census	Tracts	Popula	ition	Bra	nches	ΑT	ΓMs
Level	#	%	#	%	#	%	#	%
Low	64	15.2	173,503	13.5	1	16.7	4	21.1
Moderate	111	26.4	332,459	25.9	2	33.3	4	21.1
Middle	97	23.1	360,214	28.1	2	33.3	2	10.5
Upper	126	30.0	385,242	30.1	1	16.7	6	31.5
NA	22	5.3	30,141	2.4	0	0.0	3	15.8
Total	420	100.0	1,281,559	100.0	6	100.0	19	100.0

NEW ORLEANS MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW ORLEANS MSA

The New Orleans MSA AA, unchanged since the prior evaluation, consists of the following 312 contiguous census tracts in the following contiguous parishes, two of the eight parishes that make up the New Orleans-Metairie, LA Metropolitan Statistical Area, located in southeast Louisiana.

- Jefferson Parish all census tracts
- Orleans Parish all census tracts

The following table shows that the bank operates four full-service offices and ATMs in this assessment area. There are also 13 offsite ATMs in this assessment area. The office maintains hours consistent with the area and the industry.

below the 3.5 percent national and slightly above the 3.3 percent State of Louisiana unemployment rates for the same period.

Examiners use the applicable FFIEC-updated MFI levels to analyze home mortgage loans under the borrower profile criterion. The following table shows the applicable income ranges based on the 2022 FFIEC-estimated MFI of \$81,800 for the New Orleans MSA.

Median Family Income Ranges – New Orleans MSA								
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%				
2022 (\$81,800)	<\$40,900	\$40,900 to <\$65,440	\$65,440 to <\$98,160	≥\$98,160				
Source: FFIEC (2020).		-	Annual and a second					

Competition

The New Orleans MSA AA contains a relatively good level of competition from other chartered banks. According to FDIC Deposit Market Share data as of June 30, 2023, 28 institutions operate 184 offices in the assessment area. Mortgage companies, credit unions, and finance companies also compete for loans in the area adding to the competition level. LBTC ranks 7th in deposit market share by capturing 1.7 percent of the area's deposits.

Credit and Community Development Needs and Opportunities

Considering information from bank management, as well as demographic and economic data, examiners determined that home mortgage and small business loans represent primary credit needs in the assessment area.

Regarding the area's CD needs, demographic data showing that 42.9 percent of the area's census tracts received low- or moderate-income designations and the federal disaster area designations suggest a need for activities that revitalize or stabilize qualifying geographies. In addition, the demographic data showing lower percentages of owner-occupied housing units relative to total housing units in low- and moderate-income geographies, in connection with the 42.6 percent of the area's families reporting low or moderate incomes, also suggests a need for affordable housing. The percentage of low- and moderate-income families also suggests a need for activities that benefit projects or organizations that provide community services targeted to those families. The area's businesses suggest a need for economic development activities, such as those that finance smaller sized entities that support permanent job creation, retention, or improvement for low- or moderate-income persons or geographies.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NEW ORLEANS MSA

LENDING TEST

LBTC demonstrated a satisfactory record in the New Orleans MSA AA regarding the Lending Test. Reasonable records regarding borrower profile outweighed excellent records regarding geographic distribution to support this conclusion.

	Geographic Dis	tribution of w Orleans I		ss Loans	
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	8.9	11	15.5	1,376	11.3
Moderate	26.0	23	32.4	4,346	35.5
Middle	26.8	12	16.9	2,053	16.8
Upper	36.0	25	35.2	4,442	36.4
NA	2.4	0	0.0	0	0.0
Total	100.0	71	100.0	12,217	100.0
Source: 2022 D&B Da	ta; Bank Data				

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income) in the New Orleans MSA AA. Reasonable records regarding home mortgage and small business loans support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels in the New Orleans MSA AA. Excellent performance to low-income borrowers lowered by reasonable performance to moderate-income borrowers supports this conclusion. The following table shows that, to low-income borrowers, the bank's level of lending rises 9.5 percentage points higher than the aggregate data, thereby reflecting an excellent level. The table further shows that, to moderate-income borrowers, the bank's level of lending falls 2.8 percentage points lower than the aggregate data, also reflecting a reasonable level.

Di	stribution o	f Home Mortgage New Orlea	Loans by Bons MSA AA		me Level	
Borrower Income	Families	Aggregate Data		Bank's Home I	Mortgage Loans	S
Level	(%)	(% of #)	#	%	\$(000s)	%
Low	27.3	5.5	9	15.0	1,305	6.9
Moderate	15.3	16.1	8	13.3	1,103	5.8
Middle	17.9	18.0	6	10.0	975	5,2
Upper	39.4	38.5	27	45.0	11,041	58.6
NA	0.0	21.9	10	16.7	4,431	23.5
Total	100.0	100.0	60	100.0	18,855	100.0
Source: U.S. Census data (2020); HMDA do	nta (2022). HMDA aggrego	nte data (2022).			

Small Business Loans

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes in the New Orleans MSA AA. Reasonable performance to businesses with gross annual revenue of \$1 million or less supports this conclusion. The following table shows that the bank originated over seven out of every ten loans to businesses with gross annual revenues of \$1 million or less, thereby reflecting a reasonable level.

Qualified Investments

As noted in the state level section, the bank made use of 25 QIs totaling nearly \$1.8 million in the New Orleans MSA AA. This reflects a decrease in number and an increase in dollar volume from the 34 QIs totaling over \$1.4 million in this AA at the prior evaluation. The current dollar amount equates to 37.2 percent of the bank's total QIs in the State of Louisiana compared to this area containing 94.4 percent of the bank's total deposits in this state. The responsiveness of the QIs addresses identified needs of the assessment area primarily for revitalization or stabilization efforts.

The following points are examples of the bank's QIs in the New Orleans MSA AA:

- Revitalize or Stabilize The bank invested \$350,000 in two municipal bonds. The bonds are for the costs of extensions, improvements, enlargements, alterations, renewals, and replacements to the sewerage system in an area where a majority of the census tracts are designated as low- and moderate-income. Thus, the activity revitalizes and stabilizes qualifying geographies by helping to attract new, or retain existing, businesses or residents.
- *Community Services* The bank donated \$15,500 to two school where the majority of students receive free or reduced lunch. Thus, the activity benefits organizations or projects that provide community services primarily to low- and moderate-income individuals.

Community Development Services

As noted in the state level, the bank provided 13 CD services in the New Orleans MSA AA. This figure reflects a decrease from the 24 services at the prior evaluation. The current level represents 81.3 percent of the bank's total CD services in the State of Louisiana compared to 66.7 percent of the bank's total branches in this state. The services involve bank personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. Although not particularly responsive, these activities primarily benefit community services.

The following points are examples of the bank's CD services in the New Orleans MSA AA:

- *Community Services* A bank representative serves as a Board member of a school where the majority of students receive free or reduced lunch. Thus, the activity benefits an organization that provides community services primarily to low- and moderate-income individuals.
- *Economic Development* A bank representative provided financial literacy to small business owners. Thus, the activity promotes economic development by assisting businesses that meet the size eligibility standards of the regulation and that support permanent job creation, retention, or improvement for low- or moderate-income persons or in low- and moderate-income geographies.

Additionally, the bank's retail banking services benefit low- and moderate-income individuals and areas. As seen in the following table, the bank operates most of its branches and ATMs in low- and moderate-income census tracts in the assessment area. Alternative delivery systems available

Demograp		nation of t Rouge MS	he Assessme SA AA	nt Area		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	108	18.5	19.4	27.8	29.6	4.6
Population by Geography	456,781	15.6	17.5	31.7	31.7	3.4
Housing Units by Geography	195,178	15.7	17.4	30.5	33.0	3.3
Owner-Occupied Units by Geography	99,008	8.6	14.4	34.2	42.0	0.8
Occupied Rental Units by Geography	65,633	24.3	20.1	26.2	24.4	4.9
Vacant Units by Geography	30,537	20.4	21.3	27.9	22.3	8.1
Businesses by Geography	79,146	11.9	18.3	32.5	35.9	1.4
Farms by Geography	1,450	8.8	17.5	34.6	38.1	1.0
Family Distribution by Income Level	98,787	24.7	16.4	17.2	41.8	0.0
Household Distribution by Income Level	164,641	27.8	15.3	16.5	40.4	0.0
Median Family Income – Baton Rouge, LA MSA	\$7	7,948	Median Hous Median Gross Families Belo	s Rent	evel	\$198,100 \$938 11.9%

| Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.

CONCLUSIONS ON PERFORMANCE CRITERIA IN BATON ROUGE MSA

LENDING TEST

The institution's lending performance in the Baton Rouge MSA AA is consistent with the institution's lending performance in the State of Louisiana.

Geographic Distribution

Small Business Loans

ses # 5 1	% 50.0 10.0	\$(000s) 499 65	% 25.6 3.3
1			
	10.0	65	3.3
2	20.0	66	3.4
2	20.0	1,319	67.7
0	0.0	0	0.0
) 10	100.0	1,949	100.0
	0	0 0.0	0 0.0 0

Home Mortgage Loans

Distribution of Home Mortgage Loans by Borrower Income Level Baton Rouge MSA AA							
Borrower Income Level	Families (%)	Aggregate Data (% of #)	Bank's Home Mortgage Loans				
			#	%	\$(000s)	%	
Low	24.7	9.5	0	0.0	0	0.0	
Moderate	16.4	20.0	1	33.3	189	21.5	
Middle	17.2	17.8	1	33.3	259	29.5	
Upper	41.8	32.6	1	33.3	430	49.0	
NA	0.0	20.0	0	0.0	0	0.0	
Total	100.0	100.0	3	100.0	878	100.0	

Consumer Loans

Distribution of Consumer Loans by Borrower Income Level Baton Rouge MSA AA								
Borrower Income Level	% of Households	#	%	\$(000s)	%			
Low	27.8	7	31.8	78	32.3			
Moderate	15.3	7	31.8	71	29.5			
Middle	16.5	5	22.7	40	16.6			
Upper	40.4	3	13.7	52	21.6			
Total	100.0	22	100.0	241	100.0			
Source: U.S. Census de	ata (2020); Bank data (20	022).						

COMMUNITY DEVELOPMENT TEST

The institution's CD performance in the Baton Rouge MSA AA is below the CD performance in the State of Louisiana; however, it does not change the state rating. The bank originated 4 CD loans totaling \$318,000, which accounted for 1.1 percent of the bank's total CD loans in this state. Additionally, the bank made use of QIs consisting of a \$2,000 donation that accounts for less than 0.1 percent of the bank's total QIs in this state. Lastly, the bank provided 3 CD services accounting for 18.8 percent of the CD services in this state.

Demographic Information of the Assessment Area Detroit MSA AA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	627	14.2	27.1	19.9	28.2	10.5	
Population by Geography	1,793,561	12.5	27.0	23.0	35.7	1.8	
Housing Units by Geography	814,954	14.7	28.3	21.7	32.9	2.5	
Owner-Occupied Units by Geography	434,235	8.1	21.9	23.8	45.1	1.2	
Occupied Rental Units by Geography	260,623	20.6	32.3	21.7	21.8	3.6	
Vacant Units by Geography	120,096	25.5	42.6	14.1	12.6	5.2	
Businesses by Geography	131,712	10.1	21.5	20.4	43.7	4.3	
Farms by Geography	2,130	6.9	20.5	23.6	46.9	2.0	
Family Distribution by Income Level	416,034	24.3	15.8	17.6	42.2	0.0	
Household Distribution by Income Level	694,858	26.4	15.0	16.1	42.5	0.0	
Median Family Income – Detroit- Dearborn-Livonia, MI MSA	\$63,896		Median Housing Value Median Gross Rent Families Below Poverty Level			\$126,43 \$899 16.0%	

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.

According to Moody's Analytics, major employers in the area include General Motors Corp., Ford Motor Co., and University of Michigan. The U.S. Bureau of Labor Statistics reflects a July 2023 unemployment rate of 3.9 percent for the Detroit MSA, which is above the 3.5 percent national and below the 4.3 percent State of Michigan unemployment rates for the same period.

Examiners use the applicable FFIEC-updated MFI levels to analyze home mortgage loans under the borrower profile criterion. The following table shows the applicable income ranges based on the 2022 FFIEC-estimated MFI of \$72,800 for the Detroit MSA.

Median Family Income Ranges – Detroit MSA								
Median Family Incomes	Low Moderate <50% to <80%		Middle 80% to <120%	Upper ≥120%				
2022 (\$72,800)	<\$36,400	\$36,400 to <\$58,240	\$58,240 to <\$87,360	≥\$87,3600				
Source: FFIEC (2020).	<u> </u>	1						

Competition

The Detroit MSA AA contains a relatively good level of competition from other chartered banks. According to FDIC Deposit Market Share data as of June 30, 2023, 18 institutions operate 252 offices in the assessment area. Mortgage companies, credit unions, and finance companies also compete for loans in the area adding to the competition level. LBTC ranks 15th in deposit market share by capturing 0.06 percent of the area's deposits.

			MSA AA			
Tract Income Level	Owner-Occupied	Aggregate Data (% of #)		Bank's Home I	Mortgage Loans	<u>S</u>
	Housing Units (% of #)		#	%	\$(000s)	%
Low	8.1	3.9	1	10.0	218	13.2
Moderate	21.9	14.4	6	60.0	786	47.7
Middle	23.8	28.5	2	20.0	367	22.2
Upper	45.1	52.4	1	10.0	278	16.9
NA	1.2	0.8	0	0.0	0	0.0
Total	100.0	100.0	10	100.0	1,649	100.0

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) in the Detroit MSA AA. A reasonable record regarding home mortgage loans supports this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) in the Detroit MSA AA. Reasonable performance to moderate-income borrowers hampered by poor performance to low-income borrowers supports this conclusion. The following table shows that the bank did not originate any home mortgage loans to low-income borrowers, thereby reflecting a poor level. The table further shows that, to moderate-income borrowers, the bank's level of lending rises 9.1 percentage points higher than aggregate data, reflecting a reasonable level.

Detroit MSA AA								
Borrower Income Level	Families (%)	Aggregate Data (% of #)	Bank's Home Mortgage Loans					
			#	%	\$(000s)	%		
Low	24.3	8.0	0	0.0	0	0.0		
Moderate	15.8	20.9	3	30.0	382	23,2		
Middle	17.6	23.3	3	30.0	508	30.8		
Upper	42.2	35.0	4	40.0	759	46.0		
NA	0.0	12.8	0	0.0	0	0.0		
Total	100.0	100.0	10	100.0	1,649	100.0		

COMMUNITY DEVELOPMENT TEST

The institution's CD performance demonstrates adequate responsiveness to CD needs in the assessment area through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the State of Michigan.

Community Development Services

As noted in the institution level, the bank provided 1 CD service in the State of Michigan. This figure reflects a decrease from the 12 services at the prior evaluation. The current level represents 2.3 percent of the bank's total CD services whereas the State of Michigan contains 7.1 percent of the bank's total branches. The service involves bank personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. Although not particularly responsive, this activity benefits economic development.

The following point is the bank's sole CD service in the Detroit MSA AA:

• *Economic Development* — A bank representative served on the Loan Committee of an organization that provides loans and technical assistance to small businesses. Thus, the activity promotes economic development by assisting an organization that aids businesses that meet the size eligibility standards of the regulation and that support permanent job creation, retention, or improvement for low- or moderate-income persons or in low- and moderate-income geographies.

Additionally, the bank's retail banking services benefit low- and moderate-income individuals and areas. As seen in the following table, the bank operates its branch and ATM in a moderate-income census tract in the assessment area. Alternative delivery systems available throughout all portions of this assessment area remain consistent with those discussed previously at the institution level section.

Branc	h and ATI		•	rapny In	come Level		
Census	Tracts	Tracts Population		Branches		ATMs	
#	%	#	%	#	%	#	%
89	14.2	223,493	12.5	0	0.0	0	0.0
170	27.1	484,014	27.0	1	100.0	1	100.0
125	20.0	413,377	23.0	0	0.0	1	10.0
177	28.2	641,067	35.7	0	0.0	0	0.0
66	10.5	31,610	1.8	0	0.0	0	0.0
627	100.0	1,793,561	100.0	1	100.0	1	100.0
	Census # 89 170 125 177 66	Census Tracts # % 89 14.2 170 27.1 125 20.0 177 28.2 66 10.5	Detroit Census Tracts Popular # % # 89 14.2 223,493 170 27.1 484,014 125 20.0 413,377 177 28.2 641,067 66 10.5 31,610	Detroit MSA AA Census Tracts Population # % # % 89 14.2 223,493 12.5 170 27.1 484,014 27.0 125 20.0 413,377 23.0 177 28.2 641,067 35.7 66 10.5 31,610 1.8	Detroit MSA AA Census Tracts Population Bra # % # % # 89 14.2 223,493 12.5 0 170 27.1 484,014 27.0 1 125 20.0 413,377 23.0 0 177 28.2 641,067 35.7 0 66 10.5 31,610 1.8 0	Census Tracts Population Branches # % # % 89 14.2 223,493 12.5 0 0.0 170 27.1 484,014 27.0 1 100.0 125 20.0 413,377 23.0 0 0.0 177 28.2 641,067 35.7 0 0.0 66 10.5 31,610 1.8 0 0.0	Detroit MSA AA Census Tracts Population Branches A' # % # % # 89 14.2 223,493 12.5 0 0.0 0 170 27.1 484,014 27.0 1 100.0 1 125 20.0 413,377 23.0 0 0.0 1 177 28.2 641,067 35.7 0 0.0 0 66 10.5 31,610 1.8 0 0.0 0

Demograp	Demographic Information of the Assessment Area Jackson MSA AA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	67	22.4	29.9	31.3	13.4	3.0		
Population by Geography	227,742	14.9	27.3	40.4	16.6	0.9		
Housing Units by Geography	104,356	18.0	29.3	36.1	15.1	1.4		
Owner-Occupied Units by Geography	51,403	10.8	21.2	48.4	19.3	0.3		
Occupied Rental Units by Geography	37,429	25.6	36.0	24.0	11.4	2.9		
Vacant Units by Geography	15,524	23.6	40.1	24.3	10.4	1.6		
Businesses by Geography	23,766	14.3	21.3	33.0	23.5	7.9		
Farms by Geography	541	8.5	16.3	47.1	24.2	3.9		
Family Distribution by Income Level	54,762	29.1	17.9	19.4	33.6	0.0		
Household Distribution by Income Level	88,832	30.1	17.6	17.5	34.8	0.0		
Median Family Income – Jackson, MS MSA	,		Median Housing Value Median Gross Rent Families Below Poverty Level			\$112,661 \$864 15.9%		

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.

According to Moody's Analytics, major employers in the area include University of Mississippi Medical Center, Merit Health, and Nissan. The U.S. Bureau of Labor Statistics reflects a July 2023 unemployment rate of 3.5 percent for the Jackson MSA, which equals the 3.5 percent national and is below the 4.0 percent State of Mississippi unemployment rates for the same period.

Examiners use the applicable FFIEC-updated MFI levels to analyze home mortgage loans under the borrower profile criterion. The following table shows the applicable income ranges based on the 2022 FFIEC-estimated MFI of \$74,000 for the Jackson MSA.

	Median Family Income Ranges – Jackson MSA							
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%				
2022 (\$74,000)	<\$37,000	\$37,000 to <\$59,200	\$59,200 to <\$88,800	≥\$88,800				
Source: FFIEC (2020).								

Competition

The Jackson MSA AA contains a moderate level of competition from other chartered banks. According to FDIC Deposit Market Share data as of June 30, 2023, 16 institutions operate 66 offices in the assessment area. Mortgage companies, credit unions, and finance companies also compete for loans in the area adding to the competition level. LBTC ranks 13th in deposit market share by capturing 0.3 percent of the area's deposits.

Jackson MSA AA Treet Income Occupied Aggregate Bank's Home Mortgage Loans								
Tract Income Level	Housing Units (% of #)	Data (% of #)	#	%	\$(000s)	%		
Low	10.8	4.3	0	0.0	0	0.0		
Moderate	21.2	11.0	1	10.0	137	6.2		
Middle	48.4	53.7	4	40.0	857	38.7		
Upper	19.3	30.8	5	50.0	1,223	55.1		
NA	0.3	0.2	0	0.0	0	0.0		
Total	100.0	100.0	10	100.0	2,217	100.0		

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) in the Jackson MSA AA. A reasonable record regarding home mortgage loans supports this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) in the Jackson MSA AA. Excellent performance to moderate-income borrowers lowered by poor performance to low-income borrowers supports this conclusion. The following table shows that no loans originated to low-income borrowers, thereby reflecting a poor level. The table further shows that, to moderate-income borrowers, the bank's level of lending rises 19.8 percentage points higher than aggregate data, reflecting an excellent level. Examiners also noted that, in 2020 and 2021, the bank originated three and ten home mortgage loans, respectively, in low-income tracts. For both years, the bank's lending levels exceeded aggregate data.

		Jackson I	MSA AA			
Borrower Income	Families	Aggregate Data]	Bank's Home I	Mortgage Loans	S
Level	(%)	(% of #)	#	%	\$(000s)	%
Low	29.1	7.3	0	0.0	0	0.0
Moderate	17.9	20.2	4	40.0	612	27.6
Middle	19.4	19.5	4	40.0	794	35.8
Upper	33.6	30.4	2	20.0	811	36.6
NA	0.0	22.7	0	0.0	0	0.0
Total	100.0	100.0	10	100.0	2,217	100.0

benefits organizations or projects that provide community services primarily to low- and moderate-income individuals.

Community Development Services

As noted in the institution level, the bank provided 7 CD services in the State of Mississippi. This figure reflects a decrease from the 21 services at the prior evaluation. The current level represents 16.3 percent of the bank's total CD services, whereas the State of Mississippi contains 7.1 percent of the bank's total branches. The services involve bank personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. Although not particularly responsive, these activities benefit community services and affordable housing.

The following points are examples of the bank's CD services in the Jackson MSA AA:

- *Community Services* A bank representative taught financial literacy classes at a school where the majority of students are low- and moderate-income individuals. Thus, the activity benefits organizations or projects that provide community services primarily to low- and moderate-income individuals.
- Affordable Housing Bank representatives provided technical assistance to low-income individuals who applied for grants through the Federal Home Loan Bank's Homebuyer Equity Leverage Partnership (HELP) program. The HELP program assists low-incomequalified, first-time homebuyers with down payment assistance and closing costs. Thus, the activity helps provide affordable housing to low- and moderate-income individuals.

Additionally, the bank's retail banking services benefit low- and moderate-income individuals and areas. As seen in the following table, the bank operates its branch and two of its ATMs in low- and moderate-income census tracts in the assessment area. Alternative delivery systems available throughout all portions of this assessment area remain consistent with those discussed previously at the institution level section.

	Branc	h and ATN		on by Geog 1 MSA AA	raphy In	come Level			
Tract Income	Censu	s Tracts	Popul	Population		Branches		ATMs	
Level	#	%	#	%	#	%	#	%	
Low	15	22.4	33,853	14.9	1	100.0	1	33.3	
Moderate	20	29.9	62,159	27.3	0	0.0	1	33.3	
Middle	21	31.3	92,031	40.4	0	0.0	0	10.0	
Upper	9	13.4	37,698	16.5	0	0.0	1	33.3	
NA	2	3.0	2,001	0.9	0	0.0	0	0.0	
Total	67	100.0	227,742	100.0	1	100.0	3	100.0	
Source: U.S. Census D	ata (2020); Ba	nk Data.							

Demogra	Demographic Information of the Assessment Area Memphis MSA AA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	249	20.5	26.9	19.7	28.1	4.8		
Population by Geography	929,744	15.5	27.0	22.6	33.6	1.4		
Housing Units by Geography	406,026	17.8	27.6	22.2	31.3	1.1		
Owner-Occupied Units by Geography	195,260	9.0	23.3	22.9	44,4	0.4		
Occupied Rental Units by Geography	161,347	23.6	31.4	22.9	20.1	1.9		
Vacant Units by Geography	49,419	33.5	32.2	17.4	15.6	1.3		
Businesses by Geography	97,718	10.5	23.9	21.0	42.1	2.5		
Farms by Geography	1,758	9.1	20.2	21.4	47.6	1.7		
Family Distribution by Income Level	219,410	24.9	15.8	17.5	41.8	0.0		
Household Distribution by Income Level	356,607	26.7	15.7	16.5	41.2	0.0		
Median Family Income – Memphis, TN-MS-AR MSA	Median Family Income – Memphis, \$68,008 Median Housing Value		evel	\$155,181 \$977 14.3%				

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.

According to Moody's Analytics, major employers in the area include FedEx Corp., United States Government, and Methodist Le Bonheur Healthcare Corp. The U.S. Bureau of Labor Statistics reflects a July 2023 unemployment rate of 4.5 percent for the Memphis MSA, which exceeds both the 3.5 percent national and the 3.7 percent State of Tennessee unemployment rates for the same period.

Examiners use the applicable FFIEC-updated MFI levels to analyze consumer loans under the borrower profile criterion. The following table shows the applicable income ranges based on the 2022 FFIEC-estimated MFI of \$76,200 for the Memphis MSA.

ow	Moderate	Middle	Upper
50%	50% to <80%	80% to <120%	≥120%
8,100	\$38,100 to <\$60,960	\$60,960 to <\$91,440	≥\$91,440

Competition

The Memphis MSA AA contains a relatively good level of competition from other chartered banks. According to FDIC Deposit Market Share data as of June 30, 2023, 31 institutions operate 199 offices in the assessment area. Mortgage companies, credit unions, and finance companies also compete for loans in the area adding to the competition level. LBTC ranks 25th in deposit market share by capturing 0.3 percent of the area's deposits.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TENNESSEE

LENDING TEST

LBTC demonstrated a satisfactory record regarding the Lending Test in the State of Tennessee. Reasonable borrower profile and excellent geographic distribution support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the Memphis MSA AA. An excellent record regarding small business loans and an excellent record regarding consumer loans supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the Memphis MSA AA. Excellent performance in moderate-income geographies outweighed reasonable performance in low-income geographies to support this conclusion. The following table shows that, in low-income census tracts, the bank's level of lending is 6.2 percentage points higher than demographic data, reflecting reasonable performance. The table further shows that in moderate-income tracts, the bank's level of lending rises 17.8 percentage points higher than the demographic data, evidencing excellent performance. Given the consideration of the greater percentage of businesses within moderate-income geographies, the excellent performance for moderate-income geographies outweighed the reasonable performance in low-income geographies.

Geographic Distribution of Small Business Loans Memphis MSA AA						
Tract Income Level	% of Businesses	#	%	\$(000s)	%	
Low	10.5	4	16.7	1,236	29.7	
Moderate	23.9	10	41.7	1,243	29.9	
Middle	21.0	5	20.8	586	14.1	
Upper	42.1	2	8.3	88	2.1	
NA	2.5	3	12.5	1,009	24.2	
Total	100.0	24	100.0	4,162	100.0	
Source: 2022 D&B Da	nta; Bank Data					

Consumer Loans

The geographic distribution of consumer loans reflects excellent dispersion throughout the Memphis MSA AA. Excellent performance in low-income geographies sufficiently lifted reasonable performance in moderate-income geographies to support this conclusion. The following table shows that, in low-income census tracts, the bank's level of lending rises 38.9 percentage points higher than the demographic data, reflecting excellent performance. The table further shows that in moderate-income tracts, the bank's level of lending rises 0.3 percentage points higher than the demographic data, evidencing reasonable performance.

The table further shows that, to moderate-income borrowers, the bank's level of lending falls 6.6 percentage points below demographic data, also reflecting a reasonable level.

Distribution of Consumer Loans by Borrower Income Level Memphis MSA AA						
Borrower Income Level	% of Households	#	%	\$(000s)	%	
Low	26.7	4	36.4	17	15.3	
Moderate	15.7	1	9.1	15	13.5	
Middle	16.5	4	36.4	68	61.3	
Uppèr	41.2	2	18.1	11	9.9	
Total	100.0	11	100.0	111	100.0	

COMMUNITY DEVELOPMENT TEST

The institution's CD performance demonstrates adequate responsiveness to CD needs in the assessment area through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the State of Tennessee.

Community Development Loans

As noted in the institution level section, the bank originated 23 CD loans totaling nearly \$4.8 million in the State of Tennessee. The current dollar amount equates to 6.5 percent of the bank's total CD loans compared to this rated area contributed 9.7 percent of the bank's total dollar volume of loans. The responsiveness of the loans address identified needs in the assessment area primarily targeted to revitalization and stabilization efforts.

The following points are examples of the bank's CD loans in the Memphis MSA AA:

- Revitalize or Stabilize The bank renewed a \$1.2 million loan originally made to purchase a church facility located in a low-income census tract. Thus, the activity revitalizes and stabilizes qualifying geographies by helping to attract new, or retain existing, businesses or residents.
- Revitalize or Stabilize The bank renewed a \$1.3 million loan originally made to provide working capital for operating expenses to a college located in low-income census tract. Thus, the activity revitalizes and stabilizes qualifying geographies by helping to attract new, or retain existing, businesses or residents.

Qualified Investments

As noted in the institution level section, the bank made use of 5 QIs totaling \$1.6 million in the State of Tennessee. The current dollar amount equates to 16.3 percent of the bank's total QIs compared to this rated area containing 8.5 percent of the bank's total deposits. Although not

	1			is MSA AA				
Tract Income	Census	Tracts	Popul	ation	Branches		A'	ΓMs
Level	#	%	#	%	#	%	#	%
Low	51	20.5	143,782	15.5	0	0.0	0	0.0
Moderate	67	26.9	250,596	27.0	0	0.0	0	0.0
Middle	49	19.7	209,671	22.5	1	100.0	1	100.0
Upper	70	28.1	312,540	33.6	0	0.0	0	0.0
NA	12	4.8	13,155	1.4	0	0.0	0	0.0
Total	249	100.0	929,744	100.0	1	100.0	1	100.0

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
Kansas City	Satisfactory	Satisfactory	Satisfactory
Alabama	Satisfactory	Satisfactory	Satisfactory
Illinois	Satisfactory	Satisfactory	Satisfactory
Louisiana	Satisfactory	Satisfactory	Satisfactory
Michigan	Satisfactory	Satisfactory	Satisfactory
Mississippi	Satisfactory	Satisfactory	Satisfactory
Tennessee	Satisfactory	Satisfactory	Satisfactory

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Core Based Statistical Area (LBTCSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of LBTCSAs.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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 area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a LBTCSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): LBTCSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

BRANCH LOCATIONS



New Orleans, LA.

Crowder Branch 7200 Crowder Blvd.

New Orleans, LA. 70127

Hours:

Monday thru Thursday 9am - 3:00pmFriday 9am - 5:00pmSaturday 9am - 12pm

> MSA/MD: 35380 State Code: 22 County Code: 071

Census Tract Code: 0017.28

Franklin Branch 6600 Franklin Ave.

New Orleans, LA. 70122

Hours:

Monday thru Friday 9am - 7:00pmSaturday 9am - 12:00pm

> MSA/MD: 35380 State Code: 22 County Code: 071

Census Tract Code: 0133.02

General Degaulle Branch 3535 General Degaulle Dr. New Orleans, LA. 70114

Hours:

 $\begin{array}{ll} \mbox{Monday thru Thursday} & 9am - 3:00pm \\ \mbox{Friday} & 9am - 5:00pm \\ \mbox{Saturday} & 9am - 12pm \end{array}$

MSA/MD: 35380 State Code: 22 County Code: 071

Census Tract Code: 0006.13

Gentilly Branch 3002 Gentilly Blvd. New Orleans, LA. 70122

Hours:

 $\begin{array}{ll} \mbox{Monday thru Thursday} & 9am - 3:00pm \\ \mbox{Friday} & 9am - 5:00pm \\ \mbox{Saturday} & 9am - 12:00pm \end{array}$

MSA/MD: 35380 State Code: 22 County Code: 071

Census Tract Code: 0033.08

Canal Branch 2714 Canal Street

New Orleans, LA. 70119

Hours:

 $Monday\ thru\ Thursday \quad 9am-3:00pm$

Friday 9am – 5:00pm

Saturday 9am - 12pm

MSA/MD: 35380

State Code: 22 County Code: 071

Census Tract Code: 0063.00



Baton Rouge, LA.

Perkins Rd. Branch 4707 Perkins Road

Baton Rouge, LA. 70808

Hours:

9am - 3:00pm Monday thru Thursday

Friday

9am - 5:30pm

MSA/MD:

12940

State Code:

22

County Code:

033

Census Tract Code: 0026.02

Scenic Branch

7990 Scenic Highway

Baton Rouge, LA. 70807

Hours:

Monday thru Friday

9am - 3:00pm

Friday:

9am - 5:30pm

Saturday

9am - 12:00pm

Drive -up Monday thru Friday

9am – 6pm

MSA/MD:

12940

State Code:

22

County Code:

033

Census Tract Code: 0033.00

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Jackson, MS.

Livingston Office 2325 Livingston Road Jackson, MS. 39213

Hours:

Monday thru Thursday

9am - 4:30pm

Friday

9am - 5:00pm

MSA/MD:

27140

State Code:

28

County Code:

049

Census Tract Code:



Carmichael Branch 4141 Carmichael road Montgomery, AL. 36106

Hours:

Monday thru Friday 9am – 5pm Saturday Closed

> MSA/MD: 33860 State Code: 01 County Code: 101

Census Tract Code: 0033.02

Tuskegee Branch 301 N Elm Street Tuskegee, AL. 36083

Hours:

MSA/MD: NA (Outside of MSA/MD)

State Code: 01 County Code: 087

Census Tract Code: 2320.00

at Office Box	at Office Box 60131 ■	st Office Box 60131 ■ New Orlea	at Office Box 60131 ■ New Orleans, LA 701	st Office Box 60131 New Orleans, LA 70160-0131	st Office Box 60131 ■ New Orleans, LA 70160-0131 ■ 504-240-5124 (Office www.libertybank.net	st Office Box 60131 New Orleans, LA 70160-0131 504-240-5124 (Office) (504) 24



Memphis, TN.

Whitehaven Office 4606 Elvis Presley Blvd. Memphis, TN 38116

Hours

Monday thru Friday:

Lobby: 9am – 5pm

Saturday:

9am – 12pm

MSA/MD:

32820

State code:

47

County code:

157



Louisville, KY.

South 12th Street 900 S 12th Street Louisville, KY. 40210

Hours

Monday thru Friday:

Saturday:

Lobby: 9am – 4pm

Closed

MSA/MD:

31140

State code:

21

County code:

111

Census tract:

0027.00



Chicago, IL.

Roosevelt Branch 7610 West Roosevelt Road Forest Park, IL. 60130

Hours:

Monday thru Friday

Lobby:

9am - 5pm

Saturday

Lobby:

9am - 1pm

MSA/MD:

16974

State Code:

17

County Code:

031

Census Tract Code: 8161.00



Detroit, MI.

Woodward Office 9108 Woodward Ave. Detroit MI. 48202

Hours:

Monday thru Friday

9am - 4:30pm

Saturday

9am - 1pm

MSA/MD:

19804

State Code:

26

County Code:

163

Census Tract Code: 5116.00



Kansas City, KS

Fifth Street Office

1314 N. Fifth Street

Kansas City, KS. 66101

Hours:

Monday thru Thursday

9am - 5:00pm

Friday

9am - 6:00pm

Saturday

9am - 12pm

Drive thru Monday – Thursday

9am - 5pm

Friday

9am - 6pm

Saturday

9am - 12pm

MSA/MD:

28140

State Code:

20

County Code:

209

Census Tract Code: 0411.00

Kansas City, MO.

Troost Branch

4701 Troost Avenue

Kansas City, MO. 64110

Hours:

Monday thru Friday

9am - 5:00pm

Saturday

9am - 12:00pm

Drive -up Monday thru Friday

9am – 6pm

MSA/MD:

28140

State Code:

29

County Code:

095

Census Tract Code: 0075.00



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BRANCH OPENINGS AND CLOSINGS



Branch Opening and Closings

2023: 0 - Branch opening 0 - Branch closing 2022: 0- Branch opening 1- Branch closing 2021: 1- Branch opening 0- Branch closing 2020: 1- Branch opening 1- Branch closing



Branch Closings 2022

Louisville, KY

Louisville Office 900 South 12th St. Louisville, KY 40210

Hours:

Monday thru Friday:

Saturday:

9am - 5:00pm

9am - 12:00pm

MSA/MD:

31140

State Code:

21

County Code:

111

Census Tract:



Branch Opening 2021

Memphis, TN.

Whitehaven Office 4606 Elvis Presley Blvd. Memphis, TN 38116

Hours

Monday thru Friday: Lobby: 9am – 5pm

Saturday: 9am – 12pm

MSA/MD: 32820 State code: 47 County code: 157



Branch Closings 2020

Greenwell Springs, Baton Rouge, LA.

Greenwell Springs 8796 Greenwell Springs Road Baton Rouge, LA. 70814

Hours:

Monday thru Thursday:

9am - 3:00pm

Friday

9am - 5:30pm

Saturday:

9am - 12:00pm

Drive-up Monday thru Friday

9am - 6:00pm

MSA/MD:

12940

State Code:

22

County Code:

033

Census Tract:

0035.06



Branch Opening 2020

Louisville, KY.

South 12th Street 900 S 12th Street Louisville, KY. 40210

Hours

Monday thru Friday:

Lobby: 9am – 4pm

Saturday:

Closed

MSA/MD:

31140

State code:

21

County code:

111

Census tract:

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Premium Checking

Rewarding a higher balance with Interest, our Premium Checking account is one of the many ways we like to help your money achieve its highest potential.

FEATURES

- Interest earned when a minimum balance of \$1,000 is maintained
- \$50 deposit to open
- Balances that fall below \$1,000 per statement cycle will incur a \$10 service fee
- No fee for the first 20 checks or other debit items per statement cycle, thereafter only \$0.25 per check or other debit item
- Statement shows check images, can be combined with other statements

ACCOUNT MANAGEMENT TOOLS

- · Online banking
- Monthly statement
- · 24-hour Telebank Service
- · Online bill pay (additional charge)

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Personal Checking

When you maintain a steady balance of \$500 or more in our Personal Checking account, you're free to enjoy as much check writing and check card use as your finances allow without incurring a monthly fee.

FEATURES

- Unlimited check writing
- Visa debit card
- \$50 deposit to open
- Balances that fall below \$500 per statement cycle will incur a \$10 service fee
- Statement shows check images, can be combined with other statements

ACCOUNT MANAGEMENT TOOLS

- · Online banking
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ETA Account

With low maintenance and low cost, our Electronic Transfer Account makes banking nice and easy for those who receive federal benefit payments.

FEATURES

- · No minimum balance required
- VISA® Debit Card
- . No minimum opening deposit
- · Direct deposit required
- · No check writing capabilities
- Low fixed service charge of \$3.00 per statement cycle
- · For customers who receive Federal benefit payments

ACCOUNT MANAGEMENT TOOLS

- Online banking
- Monthly statement
- 24-hour Telebank Service
- Online bill pay (additional charge)

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First Account

Equipped with direct deposit and a VISA® Debit Card in place of checks, banking with our First Account couldn't be simpler for the minimalist or first timer. Not only that, it will protect you from the possibility of

FEATURES

- . No minimum balance required
- VISA® Debit Card
- · No minimum opening deposit
- · Direct deposit required
- · No check writing capabilities
- Low fixed service charge of \$2.00 per statement cycle

ACCOUNT MANAGEMENT FEATURES

- Online banking
- Monthly statement
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Capital Asset Fund

With our Capital Asset Fund's check-writing flexibility and rewarding interest, you'll find freedom to grow your savings, while maintaining easy access too.

FEATURES

- \$2,500 to open
- · Interest earned when a minimum balance of \$2,500 is maintained
- · Unlimited in-person transactions
- . Limit of six checks or debit card transactions per statement cycle, thereafter \$10 per excessive
- Balances that fall below \$2,500 per statement cycle will incur a \$12 service fee
- · Statement shows check images, can be combined with other statements

ACCOUNT MANAGEMENT TOOLS

- Online banking
- · Monthly statement, combined if requested

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First Savings

With no minimum balance, service charge or deposit requirement, our First Savings account can help minors say "yes" to start saving for their future and the things they want to buy along the way.

FEATURES

- Available to minors (17 years of age and younger)
- · Only \$50 to open
- · No minimum balance required
- No monthly service charge, regardless of balance
- . Two withdrawals per statement cycle, thereafter \$2 per withdrawal

ACCOUNT MANAGEMENT TOOLS

- · Online banking
- 24-hour Telebank Service
- Monthly statement, combined if requested

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IRAs

Since earnings on your retirement contributions are not considered taxable income until withdrawal in retirement, and are compounded, an IRA is a great way to help you achieve the financial freedom that your retirement goals require.

FEATURES

- · Traditional, Roth, Education and Rollover IRA options
- · Interest earnings are tax-deferred
- Minimum deposit of only \$500 to open
- Contributions may be tax deductible, subject to income limits
- · Penalty Incurred with early withdrawal

ACCOUNT MANAGEMENT TOOLS

- · Online banking
- 24-hour Telebank Service
- Monthly statement, combined if requested

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Personal Savings

Our Personal Savings account's low starting balance and interest on any size balance makes it easy for your savings goals to shine with potential.

FEATURES

- · Interest earned on any size balance
- Only \$50 to open
- Balances that fall below \$200 will incur a \$4 monthly service fee.
- Two withdrawals per statement cycle, thereafter \$2 per withdrawal

ACCOUNT MANAGEMENT TOOLS

- Online banking
- 24-hour Telebank Service
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Certificates Of Deposit

Offering a fixed interest rate for a term you determine, a CD can set your savings free for safe and consistent growth. And when maturity rolls around, you can take it out or renew to keep up with the good work.

FEATURES

- . Interest earned with a minimum balance of \$1,000
- · Flexible terms available from three months to five years
- Minimum deposit of only \$1,000 to open
- Interest paid monthly, quarterly, semi-annually or annually at no charge
- Interest paid by check or credited to any other Liberty Bank account

ACCOUNT MANAGEMENT TOOLS

- Online banking
- 24-hour Telebank Service
- Monthly statement, combined if requested

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Penalty incurred for early withdrawal

Buy a Home

With our low rates and options, we can help you pursue your dream.

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Home Mortgage Loans

With a mortgage loan from Liberty Bank, you're free to pursue your dreams for homeownership-whether large or small; newly built or aged to perfection; mortgage-free in 30 years or sooner. We can help you determine how much you can afford and customize a financial solution for you.

To learn more about each of our mortgage loans or find other helpful resources, speak with one of our mortgage consultants.

MORTGAGE LOANS

- · Conventional Fixed-Rate Loan
- FHA Fixed-Rate Loan
- VA Fixed-Rale Loan
- Adjustable Rate Mortgage (ARM)
- Jumbo Loans

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Personal Line of Credit

With a revolving personal line of credit, you can transform immediate needs into missions accomplished. Simply write a check up to your preapproved limit. When you repay, your credit line renews for future needs.

FEATURES

- . A revolving line of credit to use as you see fit
- · Pay finance charges only when you use the line
- Easy access with special MoneyLine checks that you can use anywhere checks are accepted

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Home Equity Loans

With a home equity loan from Liberty Bank, you can take out a portion of the equity your home has acquired for use however you please and pay it back with a term that works for you. The payments may be tax-deductible too, which can make this a smart financing strategy for home improvement projects, a new business, a college education and more. Apply today and check with your tax advisor for the tax benefits available to you.

FEATURES

- Fixed monthly payment
- Flexible terms up to 15 years
- No prepayment penalty

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Installment Loans

For the opportunity that arises, the purchase on the horizon, or the unexpected need for cash, a quick, flexible installment loan from Liberty Bank can help you rise to the occasion.

To learn more about each of our mortgage loans or find other helpful resources, visit the links featured on the right side of this page or speak with one of our mortgage consultants.

options, we can help you pursue your dream. Mortgage Center »

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FEATURES

- · Compellive rates
- . Secured or unsecured loans
- No prepayment penalties
- Quick approval
- · 24-hour account information

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Automobile Loans

With a quick and easy automobile loan from Liberty Bank, you're ready to purchase the vehicle that will take you where you want to go. Freedom awalts. Apply online or in-person today-whether after negotiating the purchase price, or to discover how much you can afford ahead of time.

FEATURES

- . Loans for new or used vehicles
- · Competitive interest rates
- Flexible terms
- Fixed monthly payment
- No prepayment penalty

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Home Equity Line of Credit

With this revolving line of credit, accessing your home's equity is as convenient as writing a check. Like our home equity loan, our home equity line of credit also allows you to borrow for a variety of needs and the Interest may be tax-deductible (consult your tax advisor). What's more, its revolving nature allows you to take out just what you need, when you need it. Then repay and reuse as life demands. So plan away ... we'll help make It happen.

FEATURES

- A revolving line of credit to use as you see fit
- Flexible terms up to 36 months
- Easy access with special home equity line of credit checks that you can use anywhere checks are
- · Pay interest only when you use the line

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Online Banking

With online banking right here on our website, there are no boundaries to when you do your banking. Log in from wherever you have Internet for free, safe and convenient access to your checking, savings, CDs and loans.

- View previous activity and search transaction history
- View check images
- Transfer funds between your Liberty accounts
- Access and print account statements
- Export account Information to your personal financial management software

Getting started is easy. Here's what you will need:

· One of your Liberty Bank account numbers

(This can be a savings, checking, certificate of deposit (CD) or loan account number.)

Your Telebanking PIN

(This will be used as your password the first time you log in. If you do not have a Financial Freedom Telebanking PIN, please contact our Customer Care Center at 1.866.333.5211 Monday through Friday, 9 a.m. through 5 p.m., or visit any one of our convenient locations to obtain one.)

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Online Bill Pay

With the online bill pay option through online banking, you can infliate single or ongoing electronic payments to any payee you set up in mere seconds. Just enter the amount and delivery date and we'll do the rest to ensure your payment is received on time.

- Pay bills electronically from wherever you have internet access
- Schedule single or recurring payments to individuals or businesses
- Transaction data can be downloaded into financial programs such as Microsoft Excel, Microsoft Money or Quicken
- Cost is similar to that of stamps, but far less in time and hassie
- \$4.95 access fee per statement cycle, includes 10 bill payments
- Additional bill payments only \$0.50 each

How to Enroll in Online Bill Pay:

- You must first enroll in Online Banking after your account has been opened. If you have not enrolled for Online Banking yet, you may do so now.
- If you are an existing Online Banking customer, click on the link below to sign up for Online Bill
- Read the Liberty Online Bill Pay Services Agreement carefully. Click on the "I Agree" button if you agree with the terms and conditions.
- You can choose to enroll online, or you can print the information form. Fax the completed form to 504,240,5129, or give it to a bank representative at any Liberty Bank location.

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E-statements

The convenience of our electronic statements allows you to access your monthly account information with freedom from clutter. Enroll today via online banking.

KEY FEATURES

- · Available quickly after close of your statement cycle
- View securely online
- · Download and print, or save for your records

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VISA® Credit Card

Liberty Bank's VISA gives you the convenience you demand and the credit you deserve.

Choose a Liberty Bank VISA® and enjoy the convenience of credit wherever you go.

Use your card to pay for purchases at more than 23 million merchant locations worldwide. You can also use your VISA® to get cash at more than 700,000 VISA® ATMs and more than 400,000 VISA® Member offices around the world.

Not all credit cards are created equal. Some have high interest rates, some have high annual fees, and some have high balance transfer fees; but a Liberty Bank VISA® Oredit Card has just what you need with a low interest rate, no annual fee and no balance transfer fees.

With a Liberty Bank VISA® Credit Card, you can afford to take a vacation or consolidate other credit card balances. So apply online now, or at a Liberty Bank branch today. Get your Liberty Bank VISA® Credit Card, loday.

HERE'S WHAT YOU GET -

- No Annual Fee
- · Free Travel Accident Insurance
- Worldwide ATM cash access

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Visa® Debit Card

With a lower interest rate than most banks, no annual fee and no balance transfer fees, the Liberty Bank Visa® is all about you and your desire for a fair, straightforward credit card. It's as simple as that. Start afresh and apply online now, or at a Liberty Bank branch.

KEY FEATURES

- Usable anywhere Visa is accepted "
- · Automatically withdraws the amount from your account
- Allows deposits or transfers at our ATMs
- · Grants access to cash at ATMs anywhere (no fee for our ATMs)
- · Transactions detailed on statement

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Enterprise Checking

With an allotted number of check and debit transactions surcharge-free each statement cycle, Enterprise Checking offers simple, cost-efficient checking for sole proprietorships or nonprofit organizations. You can be rewarded with interest too.

FEATURES

- Interest earned when a minimum balance of \$1,000 is maintained
- . \$60 deposit to open
- · Statement shows check images, can be combined with other statements
- Balances that fall below \$1,000 per statement cycle will incur a \$10 service fee
- . Limit of 20 debits/checks per statement cycle, thereafter \$0.25 per debit/check

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- Online banking
- Vlsa check card
- Monthly statement
- 24-hour Telebank service

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Corporate Checking

For the freedom to conduct countless banking transactions in a cost-efficient way, we've created Corporate Checking, which can offer your business an earnings credit to help offset the service charge. Managing It is convenient with tools like online banking, and others like cash management can be added to serve other needs, such as payroll or account reconcillation.

FEATURES

- · Statement shows check images
- Earnings credit may be earned based on your average collected balance, which may help offset
- Low service charge of \$10 per statement cycle
- Fixed processing fee of only \$0.15 per item posted
- Account information fax services

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Corporate Savings

For an easy-to-maintain savings account, Corporate Savings just may be the solution for your business. It allows you to store up your excess funds with no to low cost depending on your balance and activity. Managing it online is easy, and transfers to and from your business checking account can be made

FEATURES

- · \$50 deposit to open
- No monthly service charge if you maintain a minimum balance of only \$200, otherwise \$4.00 per
- Up to two withdrawals per month, thereafter \$2.00 per withdrawal

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- Online banking
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Certificates Of Deposit

A CD from Liberty Bank gives you the ability to lock in a portion of the savings your business has at a fixed interest rate for a specific time period. You'll enjoy steady, safe, predictable earnings. And when maturity rolls around, you can take it out or renew to keep it going and growing.

FEATURES

- Interest earned with a minimum balance of \$1,000
- · Flexible terms available from three months to five years
- Minimum deposit of only \$1,000 to open
- interest paid monthly, quarterly, semi-annually or annually at no charge
- interest paid by check or credited to any other Liberty Bank account
- Penalty incurred with early withdrawal

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Capital Asset Commercial Fund

With the flexible and rewarding features of our Capital Asset Fund, you can write checks, earn interest and maintain easy access to the excess funds your business sets aside for future use. Enjoy the freedom.

FEATURES

- \$2,500 to open
- Interest earned when a minimum balance of \$2,500 is maintained
- . Unlimited in-person transactions
- Limit of six checks or debit card transactions per statement cycle, thereafter \$10 per excessive
 Inspection.
- Balances that fall below \$2,500 per statement cycle will incur a \$12 service fee
- Statement shows check images, can be combined with other statements

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Commercial Real Estate Loans

Whether purchasing existing owner-occupied or rental properties for your business, or building them from the ground up, we offer solid Commercial Real Estate Loans to help you move forward quickly and bring your plans to fruition. Apply now or talk with us personally; and as your business advocate, we'll work to personalize the loan to your needs.

FEATURES

- · Competitive interest rates
- Fast, local decisions
- · Convenient, flexible terms
- · Online viewing and payment capabilities
- · Subject to credit approval

All loans are subject to credit approval.

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Business Line of Credit

With a revolving Business Line of Credit, you can immediately accommodate for cash flow needs that arlse, such as increasing inventory, making payroll and paying time-sensitive bills. When you repay what you've used, the full amount of your credit line becomes available for future use. For some extra financial security and peace of mind, talk with us today.

FEATURES

- · A revolving line of credit to use as you see fit
- · Pay Interest only on what you use
- Can be tled to your checking account for overdraft protection
- Low annual fee
- · Subject to credit approval

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Equipment Financing

With a flexible term and down payment, Liberty Bank can offer the Equipment Financing your business needs to Invest in new technology, furniture; vehicles, other equipment and more. Talk to us today or apply now to equip your business with all it needs to succeed.

FEATURES

- Competitive interest rates
- · Fast, local decisions
- · Convenient, flexible terms
- Fixed monthly payment
- No prepayment penalty
- Online viewing and payment capabilities
- Subject to credit approval

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Automated Cash Clearinghouse

Through the Automated Cash Clearinghouse (ACH) system offered by Liberty Bank, your business can transfer payments or receipts, and handle employee payroil, vendor payments and account funds—all electronically. Additionally, you can easily concentrate funds from your accounts at other banks into one manageable Liberty Bank account. We will automatically initiate the appropriate ACH transactions.

FEATURES

- . Eliminates the need for wire transfers
- Saves time and money by automating the distribution of employee payroll
- Stores important depository bank information such as bank routing numbers
- Provides for a systematic movement of funds from your other depository locations to your Liberty account(s)
- Post funds immediately to recipient bank accounts
- Works with Liberty Premier E-Corp Internet Banking to originate ACH transactions from your office

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Online Banking

For businesses utilizing our cash management services, we offer a premier level of online banking, backed by Premier E-Corp banking software. You'll enjoy full-service access to your accounts in a completely secure environment, where you can perform traditional online banking lasks as well as sophisticated and flexible funds management capabilities--all 24/7.

FEATURES

- Multiple security controls for various users
- Access and approve stop payments, fund transfers and file transfers based on controls
- · Make controlled disbursements
- Initiate transfers (including ACH and internal transfers)
- Send domestic wire transfers
- · View previous activity and search transaction history
- View check images
- Transfer funds between your Liberty accounts
- Export account information to your financial management software
- Access and print account statements

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Account Reconciliation

Our account reconciliation system can help you match and reconcile your business checking accounts quickly and accurately by automalically capturing, auditing and storing the serial number, date and dollar amount for each transaction. We offer two levels of account reconciliation from which to choose:

FEATURES

- Partial Reconciliation: provides a listing of checks paid in serial number order with the amount, date paid, and the total number of checks and dollars paid
- Full Reconciliation: automatically compares the checks issued from a list you provide to the checks paid, and then creates lists of items issued, paid and outstanding

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Direct Deposit

By utilizing direct deposit, you can arrange to have any recurring payments, such as payroli, deposited directly into the banking accounts of your employees, adding a touch of convenience and efficiency to the tasks at hand.

FEATURES

- · Recurring payments issued and deposited electronically, instead of by check
- · Secure transmission of payroll file over the Internet via Premier E-Corp software
- · Speeds up availability efficiency of cash flow
- Free checking account for all employees participating in direct deposit
- Free ATM-only accounts for direct deposit participants

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Cash Management

With a range of cash management services, Liberty Bank can help you manage your accounts, payroll and other payments with absolute efficiency.

FEATURES

- Automated Cash Clearinghouse: allows you to transfer payments or receipts, and handle employee payroll, vendor payments and account funds, all electronically
- Account Reconciliation: matches and reconciles the checking accounts of your business with speed. accuracy and cost-control
- Online Banking: review balances, transfer funds, requesting stop payments, review corporate cash
- Direct Deposit: process payroll automatically; a free checking or ATM-only account for employees who participate

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Merchant Services

With a variety of card processing methods, the Liberty Merchant Processing System can allow you to accommodate your customers' preference to pay their way, whether debit or credit, Visa, MasterCard

FEATURES

- · Choice of phone-in authorization and in-person deposit of sales drafts, or use of our Electronic Draft Capture (EDC) terminal to authorize and automatically deposit funds
- Accommodates Visa, MasterCard, American Express, Discover, Diner's Club, International Card and Telecheck
- · Competitive discount rate
- · Quick authorization
- . Free 24-hour help line

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Making deposits electronically from your business ... It's just one more way we offer you freedom to bank how you want, when you want. With our easy-to-use Remote Deposit Capture service, checks are scanned, accurately totaled and transmitted for deposit. Funds are available sconer and you save a trip to the bank. To arrange a demonstration or find out more, talk with us today,

FEATURES

- · Scan and deposit checks securely from your desk
- Increase speed and accuracy of accounts receivable processing
- · 24/7 access to deposit status
- Extended dally deposit deadlines
- Internet access required
- Easy-to-use scanner
- Service fee based on usage

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Visa® Business Credit Card

With credit conveniently available and rewards earned on your purchases, the Liberty Bank Visa® Business Credit Card can make it easy to take care of your everyday business needs, meals, major purchases, emergencies and more. Apply online now or at any of our branches.

FEATURES

- · ScoreCard Rewards in the form of discounts and other offers
- · Usable for purchases wherever Visa is accepted
- · Worldwide ATM cash access
- No annual fee
- Travel Accident Insurance

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With the power of Visa® behind you, transactions from your business checking account are simple and quick. Your Visa® Business Debit card allows you to pay online like a credit card; pay in person with a simple swipe and entry of your PIN or signature; and access your accounts at ATMs anywhere. It's a whole lot of freedom in a tiny plastic package. Request a card free of charge today.

FEATURES

- · Usable anywhere Visa® is accepted
- Automatically withdraws the amount from your account
- Allows deposits or transfers at our ATMs
- Grants access to cash at ATMs anywhere (no fee for our ATMs)
- Transactions detailed on statement

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DELINEATION OF ASSESSMENT AREAS

Louisiana Region

Assessment area consist of: New Orleans - Metairie, LA.

MSA - 35380

Number of census tracts within MSA - 304

Counties consist of the following:

Jefferson	-127		Orleans	-177	
	Low	- 11	low		- 53
	Moderate	- 30	Mod	erate	- 45
	Middle	- 49	Mida	lle	- 22
	Upper	- 33	Uppe	er	- 47
	Unknown	- 4	Unkr	nown	- 10

Branches locations:

2714 Canal Street New Orleans, LA. 70119

6600 Franklin Avenue New Orleans, LA. 70122

3002 Gentilly Blvd. New Orleans, LA. 70122

3535 General DeGaulle New Orleans, LA. 70114

7200 Crowder Blvd. New Orleans, LA. 70126

Assessment area consist of: Baton Rouge, LA.

MSA - 12940

Number of census tracts within MSA – 92

Counties consist of the following:

East BR

Low - 17

Moderate - 27

Middle - 19

Upper - 28

Unknown - 1

Branches locations:

4707 Perkins Road Baton Rouge, LA. 70808

7990 Scenic Highway Baton Rouge, LA. 70807

Mississippi Region

Assessment area consist of: Jackson, MS.

MSA - 27140

Number of census tracts within MSA - 64

Counties consist of the following:

Hinds

Low - 15

Moderate - 23

Middle - 16

Upper - 10

Unknown - 0

Branches locations:

2325 Livingston Road Jackson, MS. 39213

Alabama Region

Assessment area consist of: Montgomery, AL.

MSA - 33860

Number of census tracts within MSA - 69

Counties consist of the following:

Montgomery - 64

Low - 11

Moderate - 19

Middle - 15

Upper - 18

Unknown - 1

Lowndes County - 5

Low - 1

Moderate - 4

Middle - 0

Upper - 0

Unknown - 0

Branches locations:

4141 Carmichael Rd. Montgomery, AL. 36106

Assessment area consist of: Tuskegee, AL.

MSA – NA (outside MSA)

Number of census tracts within MSA - 13

Counties consist of the following:

Macon

Low - 0

Moderate - 4

Middle - 6

Upper - 2

Unknown - 1

Branches locations:

301 N. Elm Street Tuskegee, AL. 36083

Illinois Region

Assessment area consist of: Chicago Naperville - Evanston, IL

MSA - 16984

Number of census tracts within MSA – 1,332

Counties consist of the following:

Cook

Low - Moderate

- 576

Middle - Upper

- 756

Unknown

- 0

Branches locations:

7610 West Roosevelt Road Forest Park, IL. 60130

Kansas – Missouri Region

Assessment areas consist of: Kansas City, MO - KS

MSA - 28140

Number of census tracts within MSA -

Counties consist of the following:

Wyndotte - 70

Low - 27

Moderate - 21

Middle - 11

Upper - 3

Unknown - 8

Jackson - 199

Low - 49

Moderate - 54

Middle - 54

Upper - 35

Unknown - 7

Branches locations:

1314 N. 5th Street, Kansas City, KS 66101

4701 Troost Avenue Kansas City, MO 64110

Michigan Region

Assessment area consist of: Detroit – Livonia – Dearborn, MI.

MSA - 19804

Number of census tracts within MSA - 611

Counties consist of the following:

Wayne

Low - 127

Moderate - 174

Middle - 117

Upper - 176

Unknown - 17

Branches locations:

9108 Woodward Avenue Detroit, MI. 48202

Tennessee Region

Assessment areas consist of: Shelby County, TN.

MSA - 32820

Number of census tracts within MSA - 221

Counties consist of the following:

Shelby County

Low - 65

Moderate - 48

Middle - 32

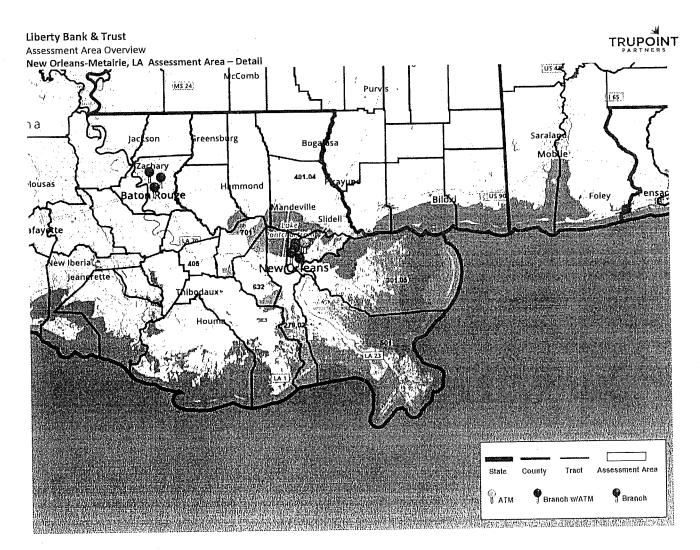
Upper - 70

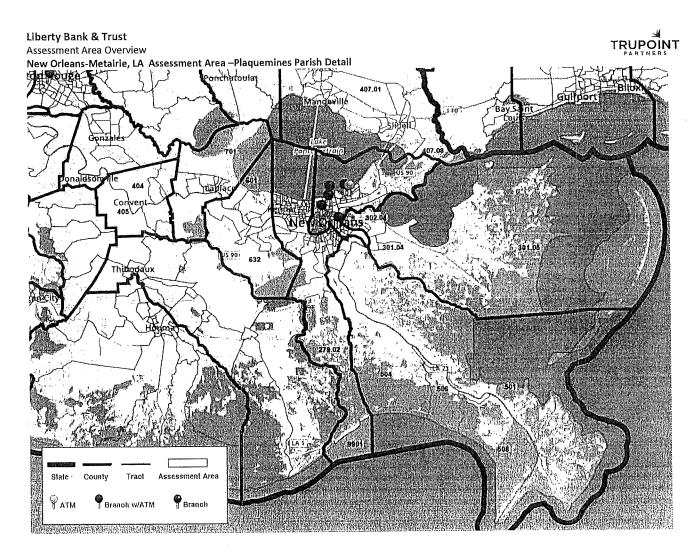
Unknown - 6

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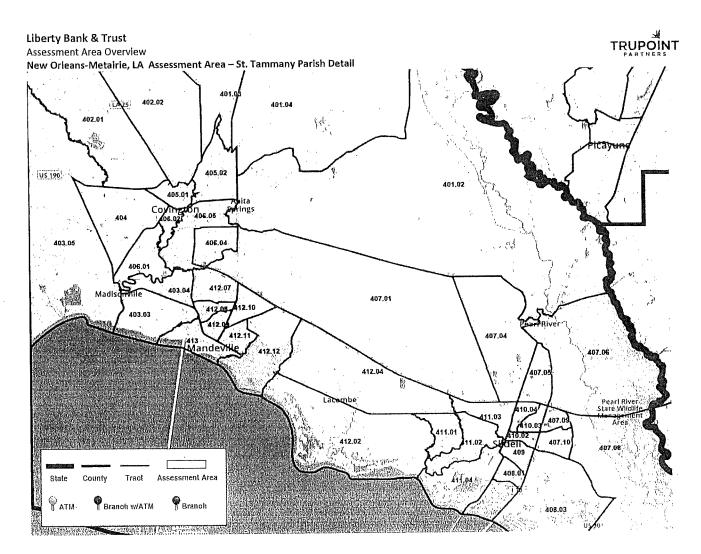
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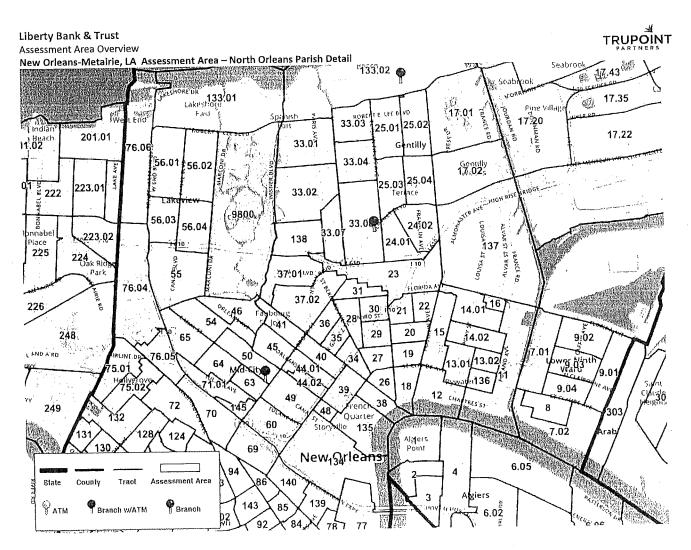




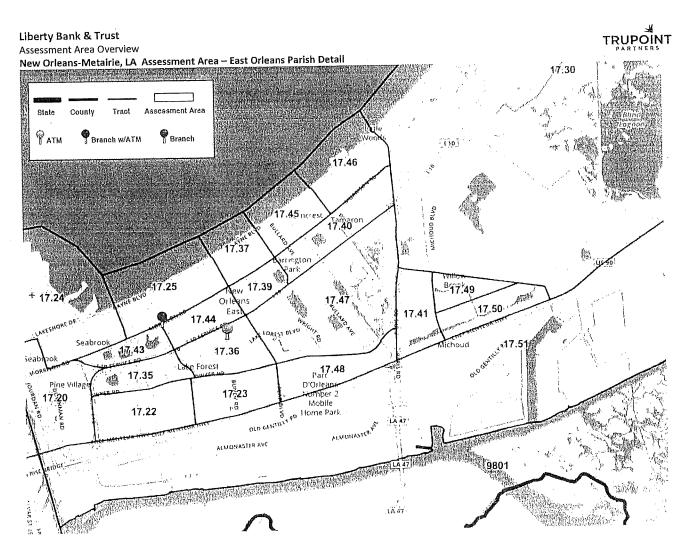
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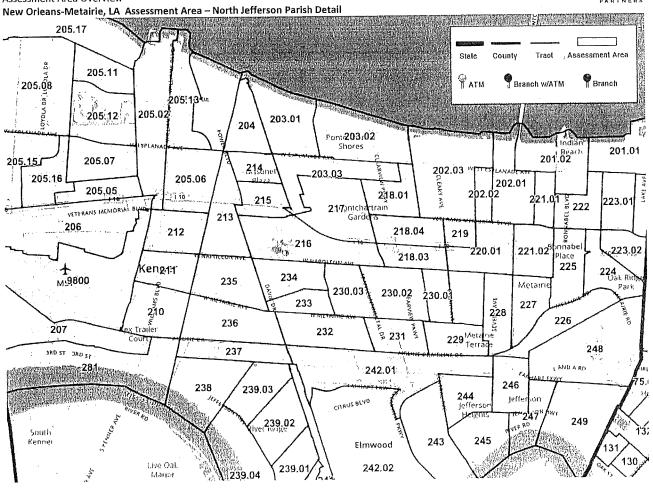
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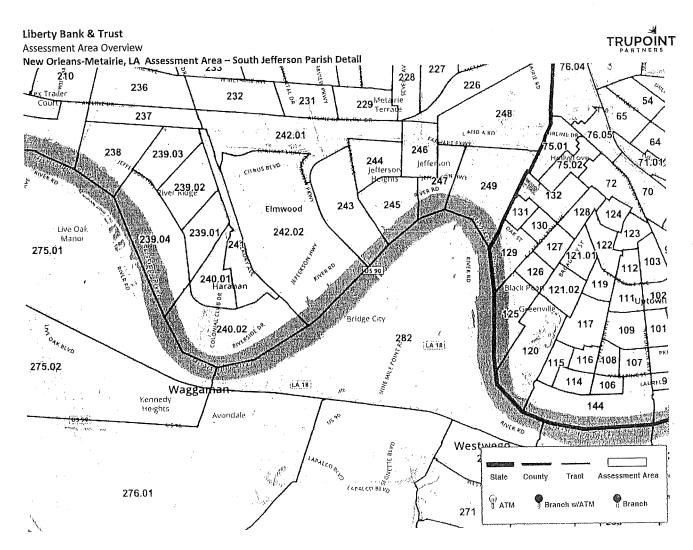


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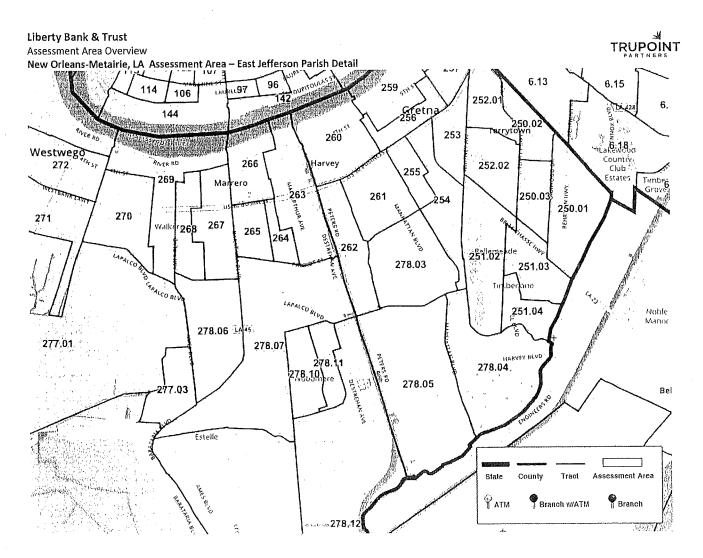
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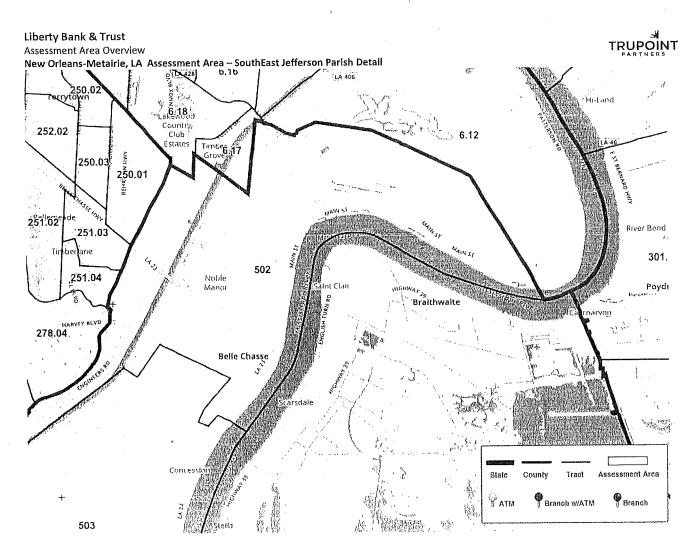


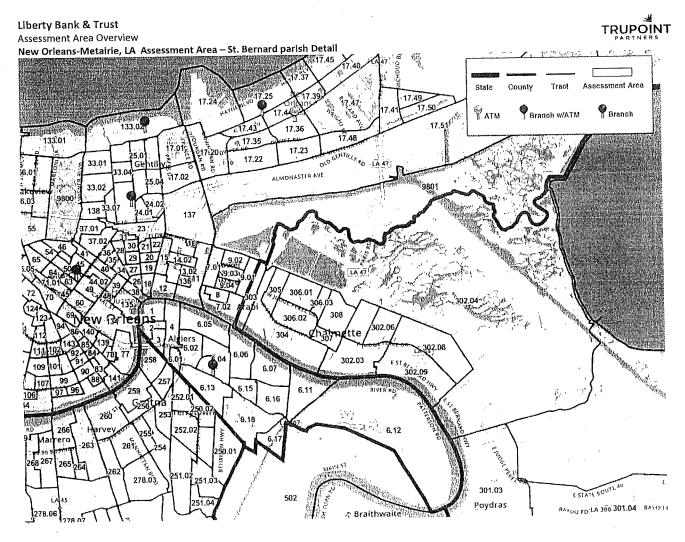


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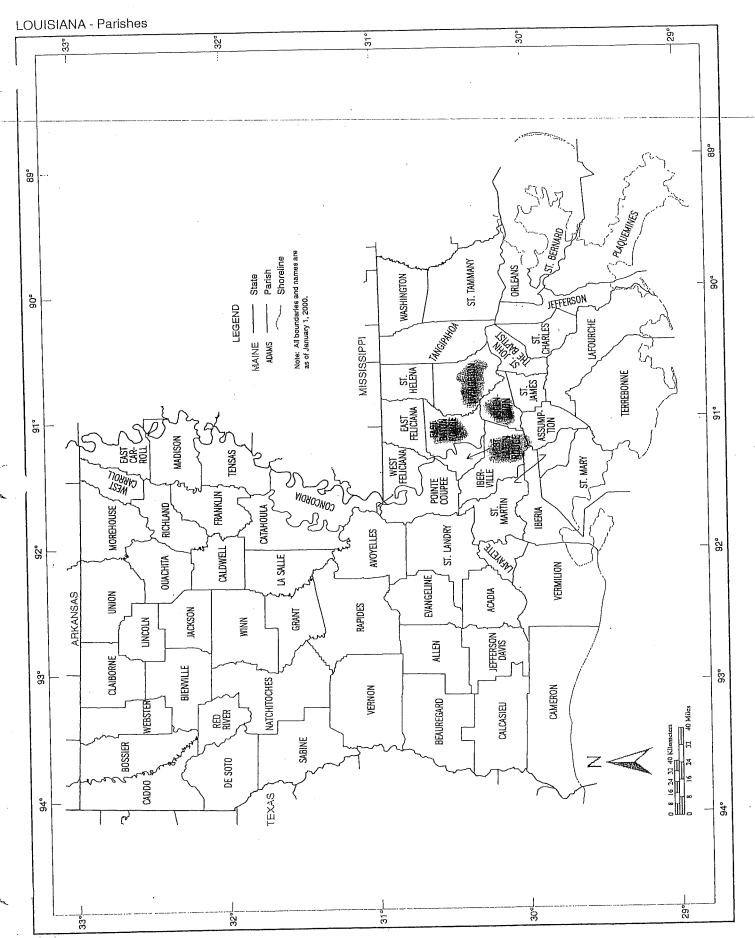
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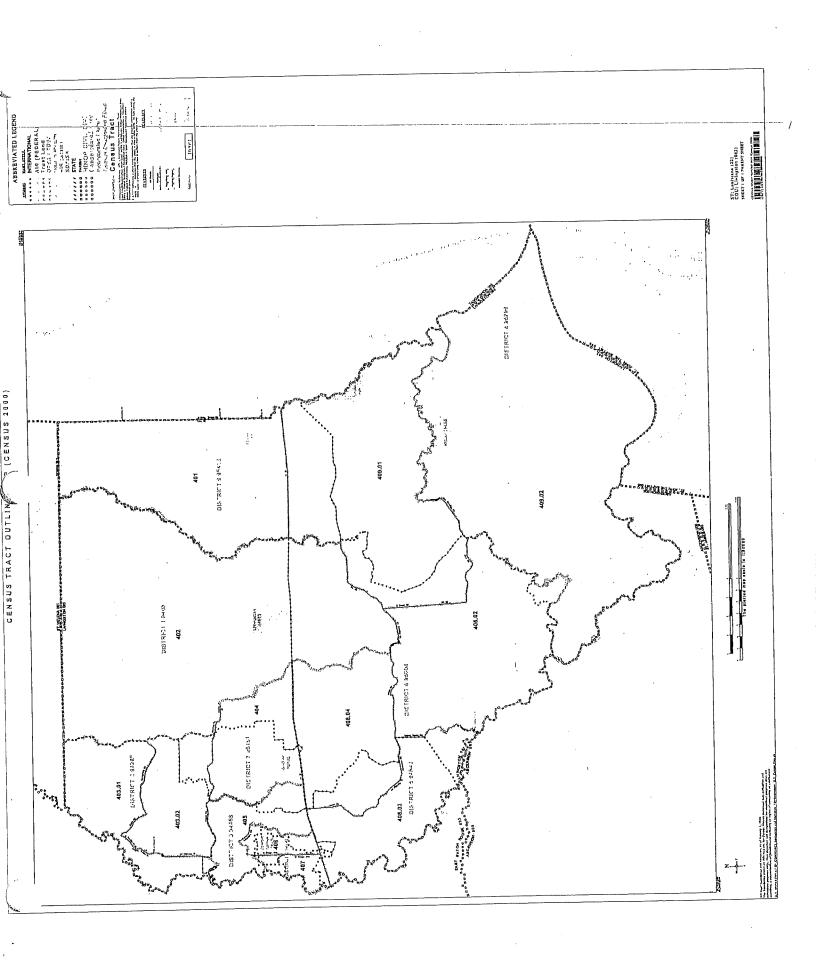


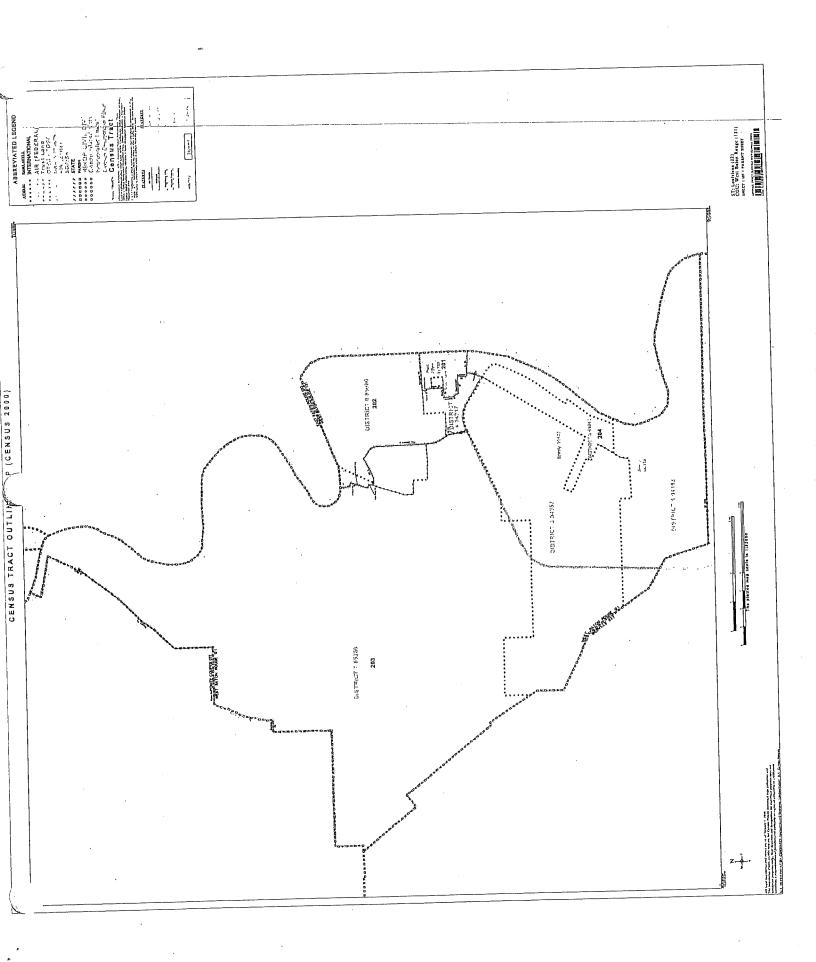


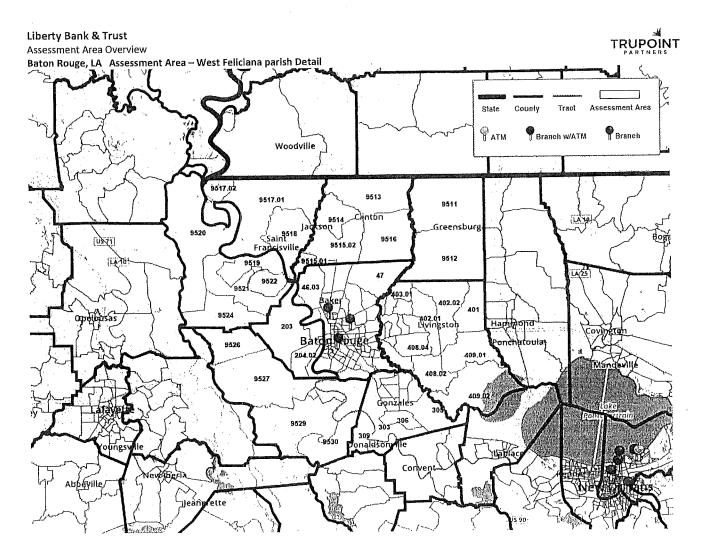
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BATON ROUGE ASSESSMENT AREA

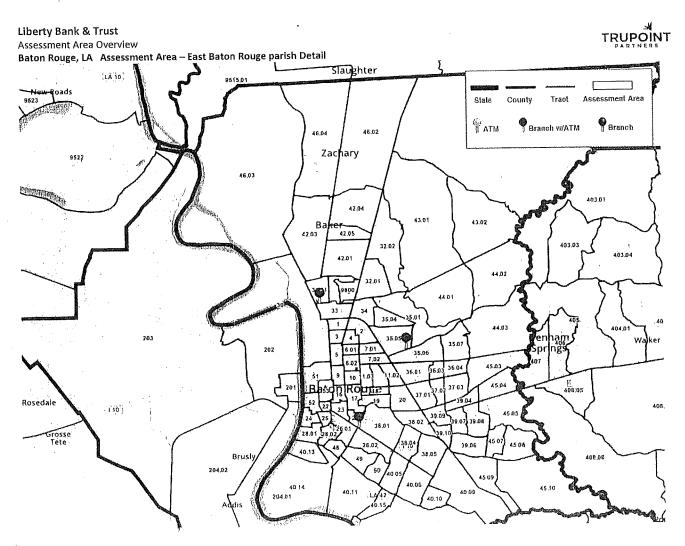


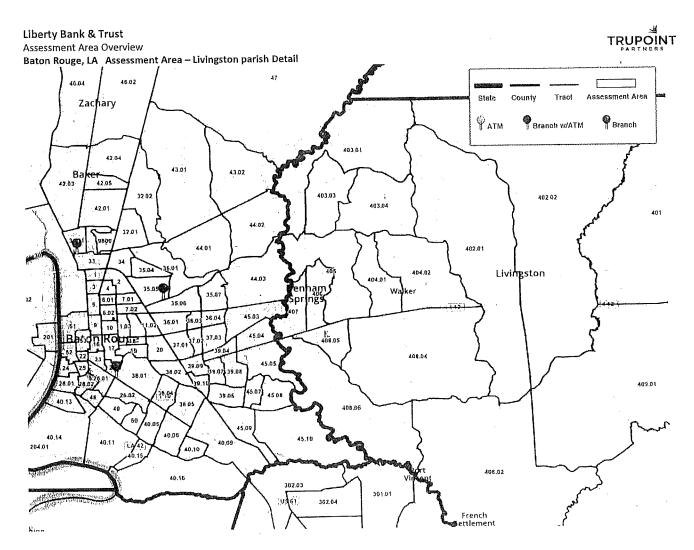


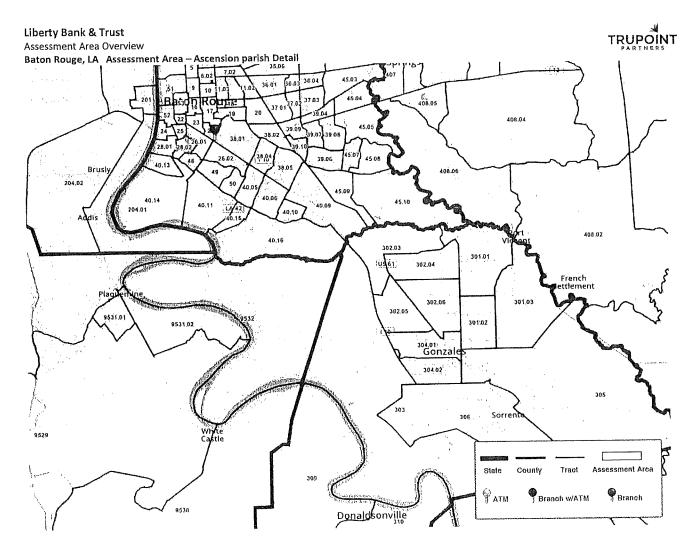




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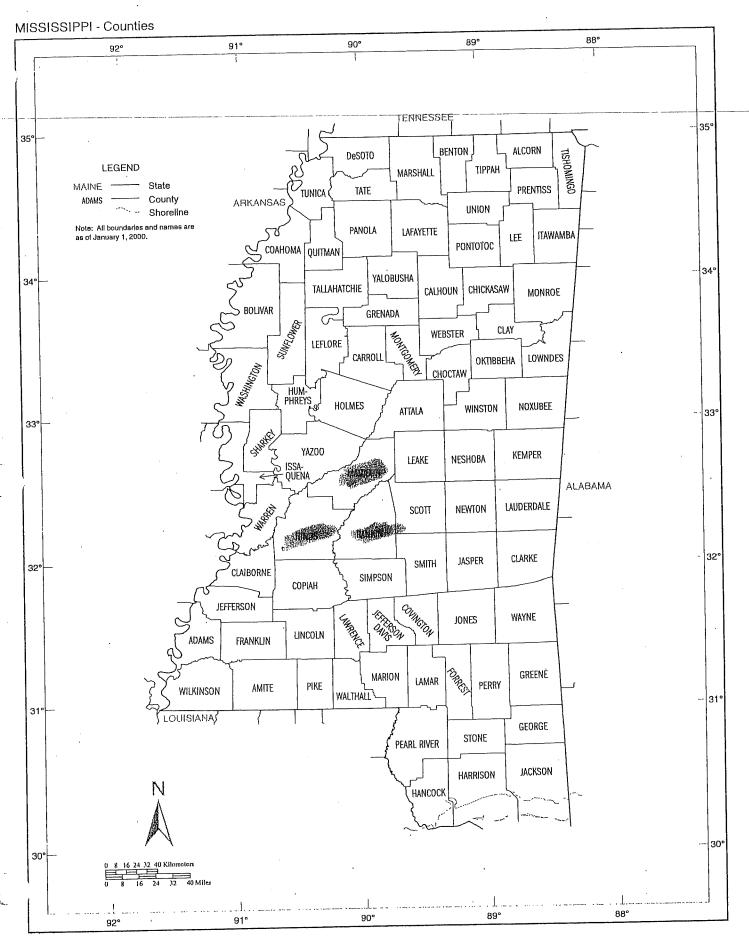


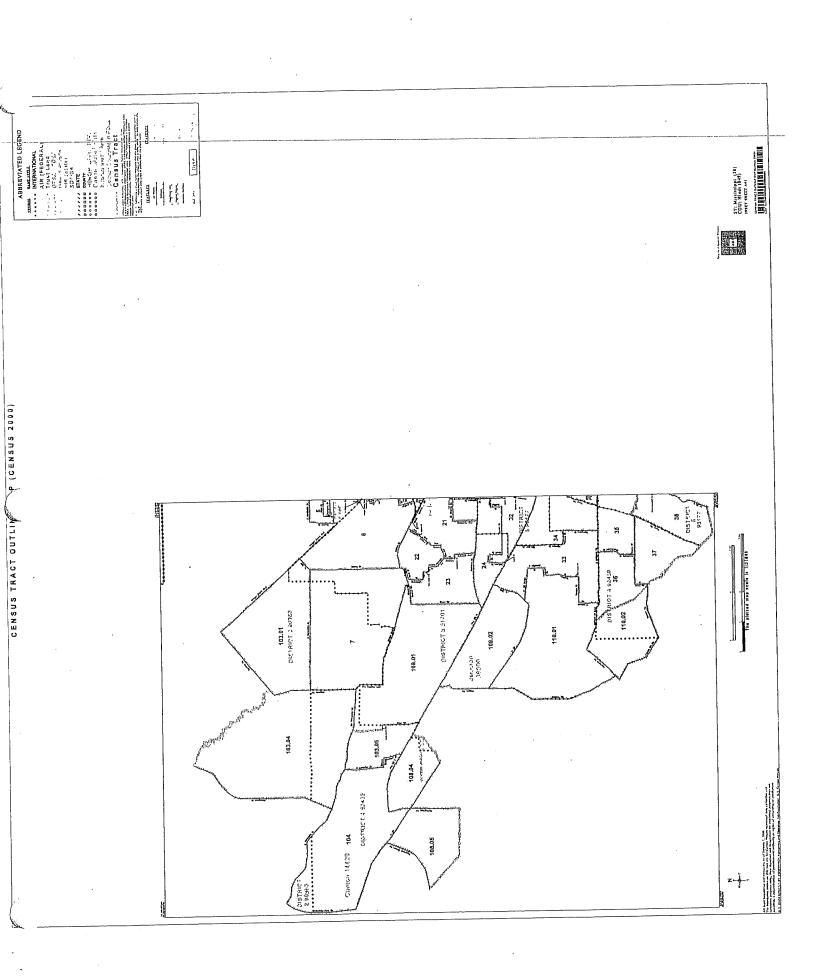


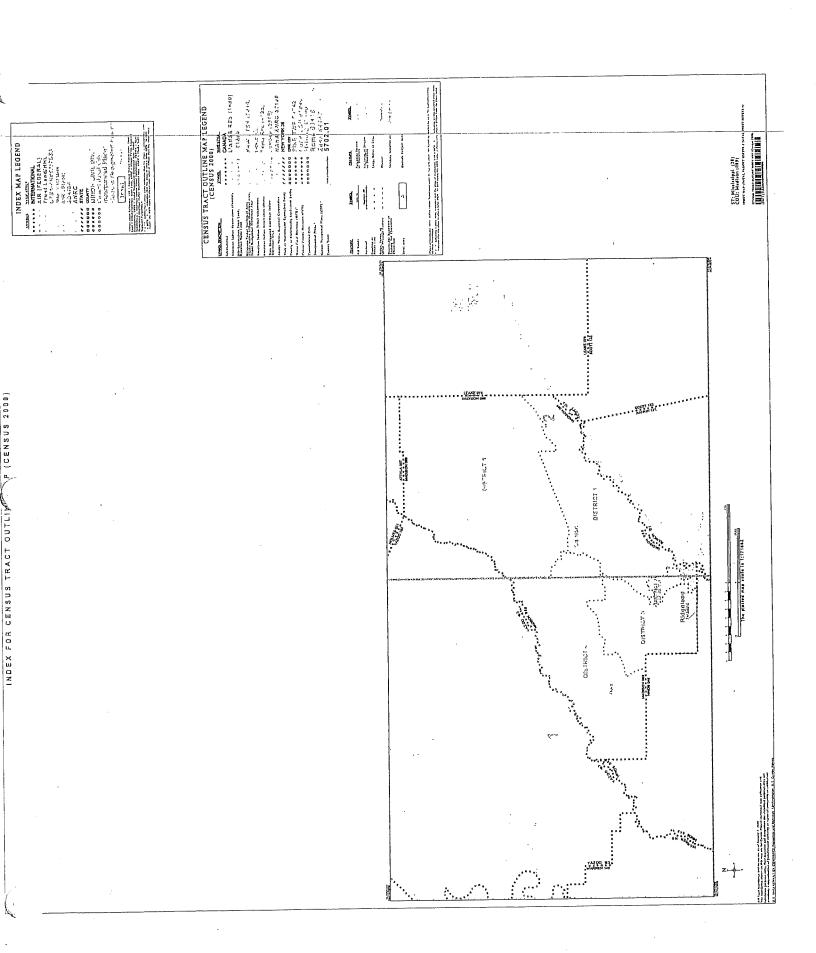


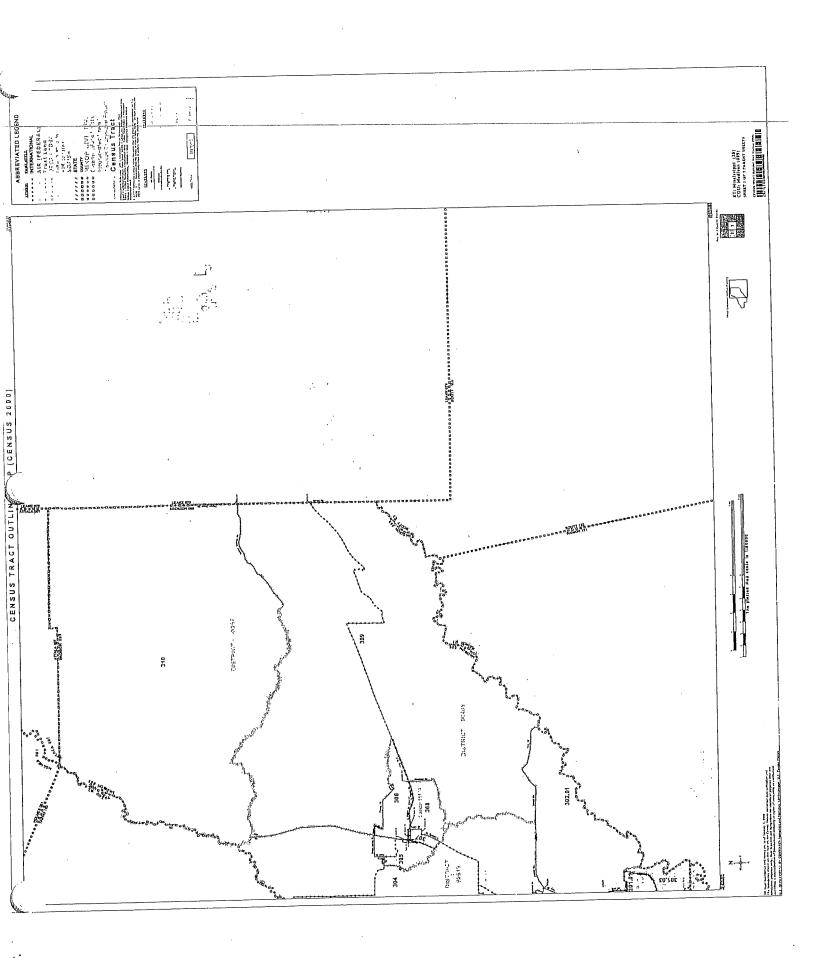
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JACKSON ASSESSMENT AREA

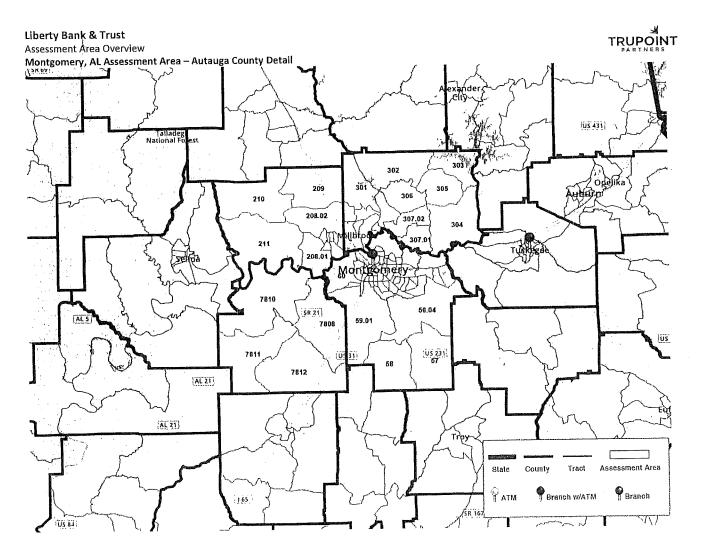




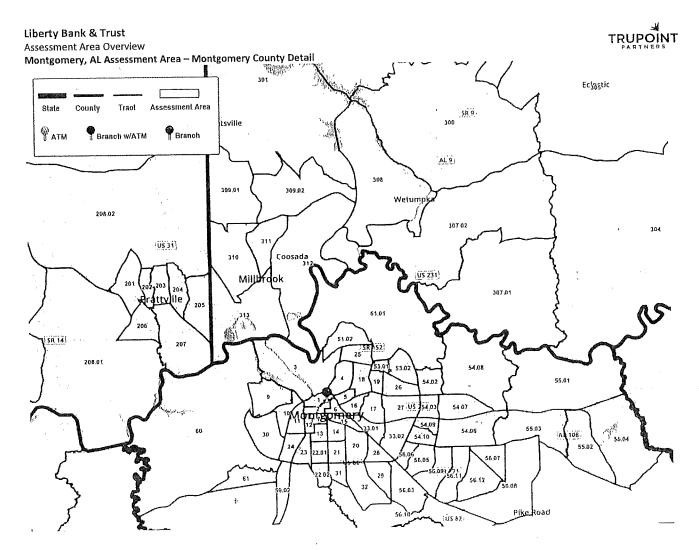




Downtown Montgomery Branch

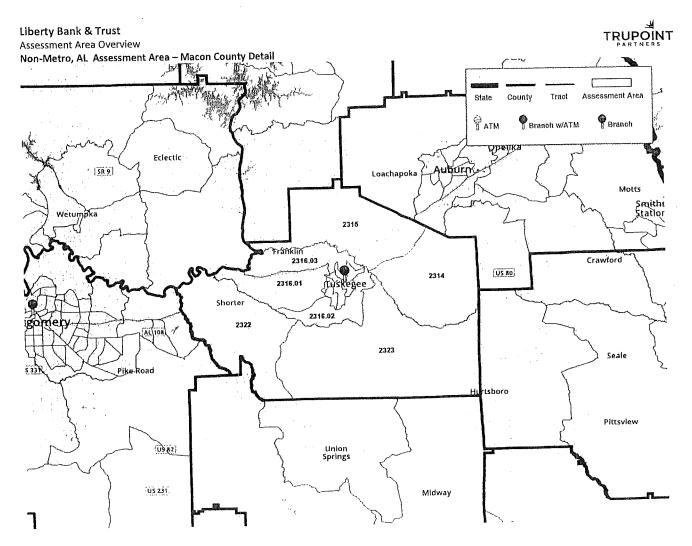


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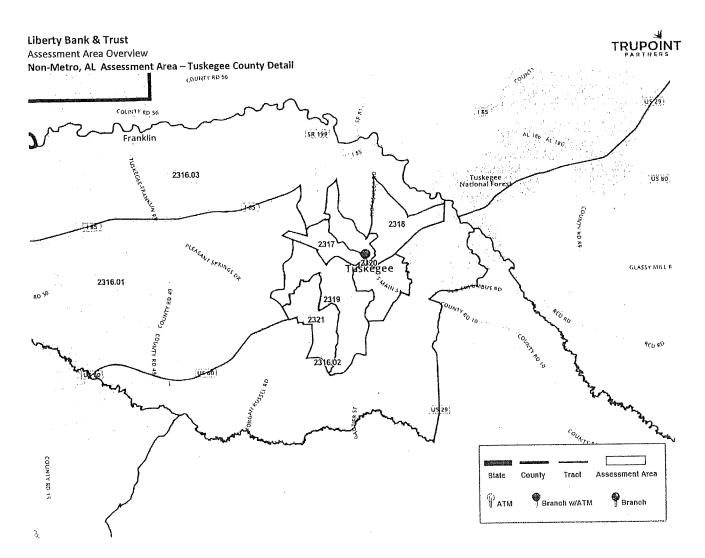


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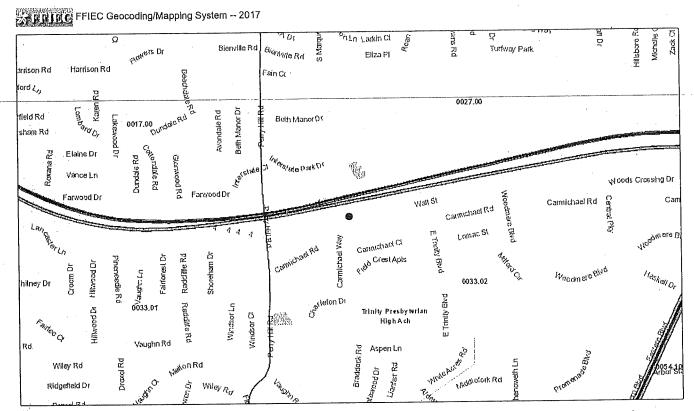
Tuskegee Branch



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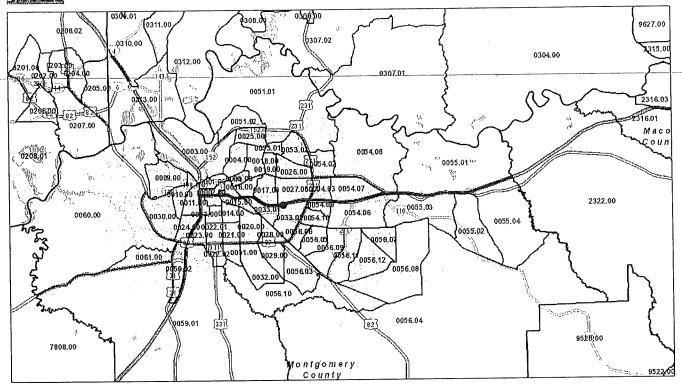
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Matched Address: 4141 CARMICHAEL RD, MONTGOMERY, AL, 36106 MSA: 33860 - MONTGOMERY, AL || State: 01 - ALABAMA || County: 101 - MONTGOMERY COUNTY || Tract Code: 0033.02

Selected Tract
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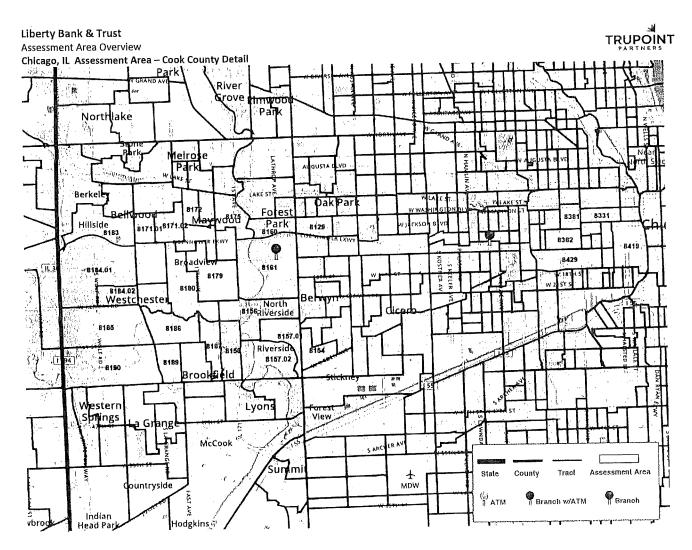
FRIDE FFIEC Geocoding/Mapping System -- 2017



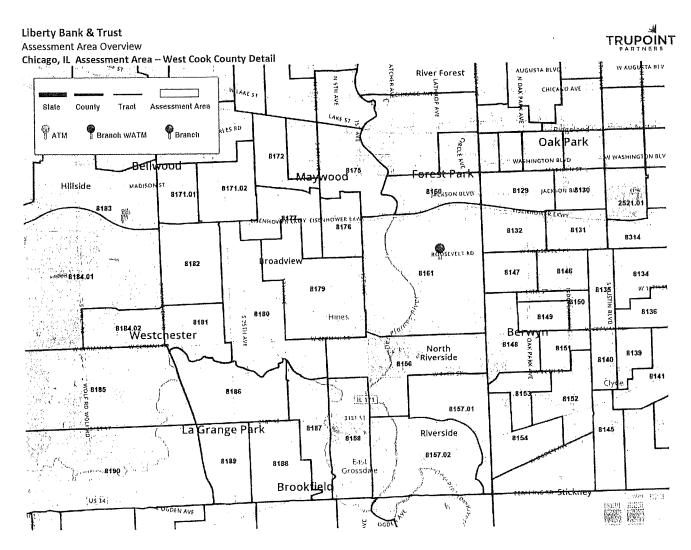
Matched Address: 4141 CARMICHAEL RD, MONTGOMERY, AL, 36106
MSA: 33860 - MONTGOMERY, AL || State: 01 - ALABAMA || County: 101 - MONTGOMERY COUNTY || Tract Code: 0033.02

Selected Tract
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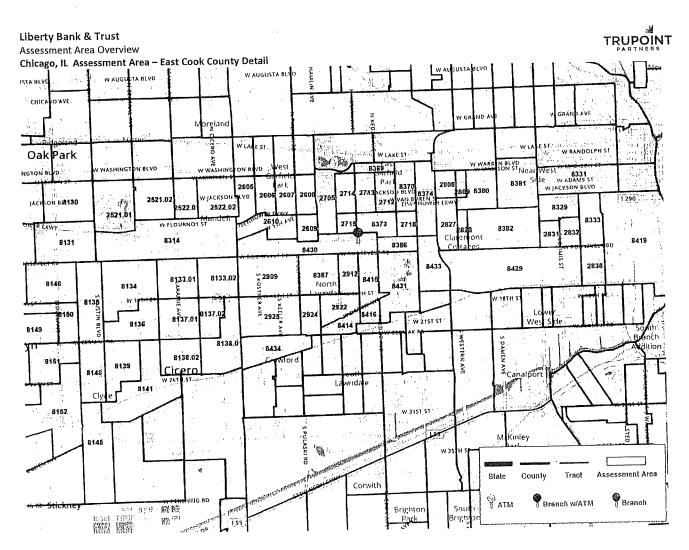
Chicago, IL. Assessment Area



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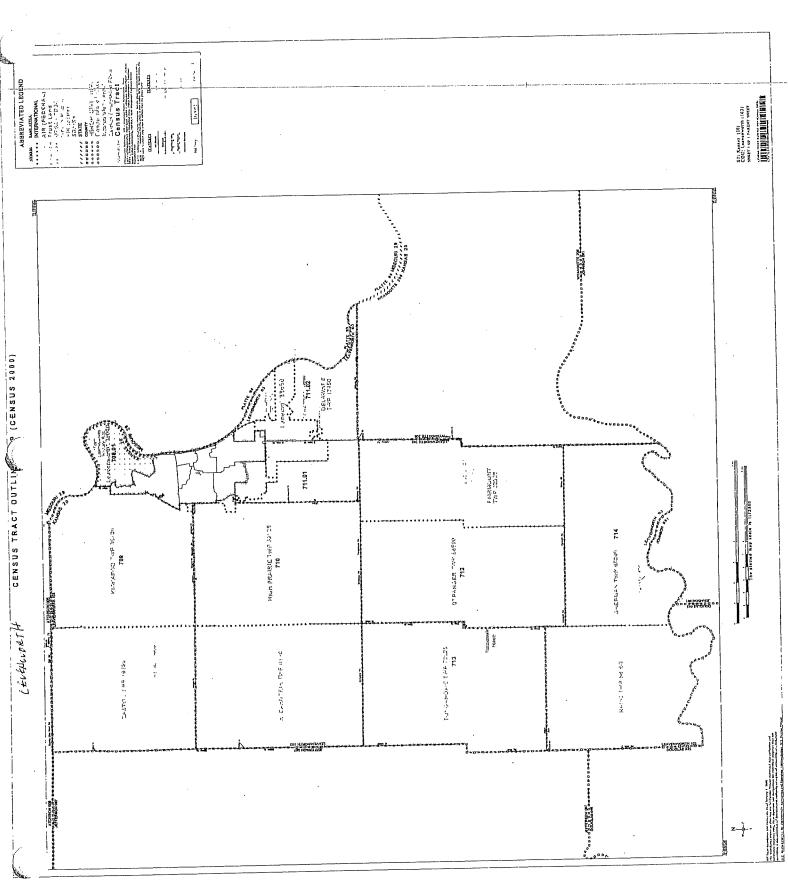


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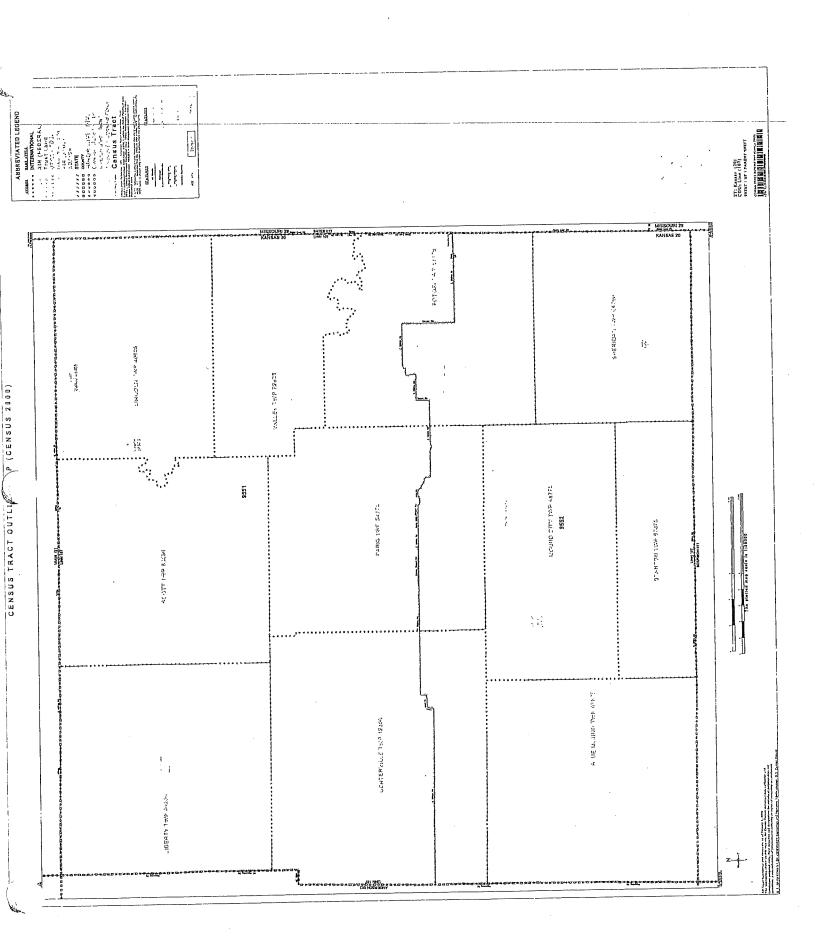
KANSAS CITY ASSESSMENT AREA



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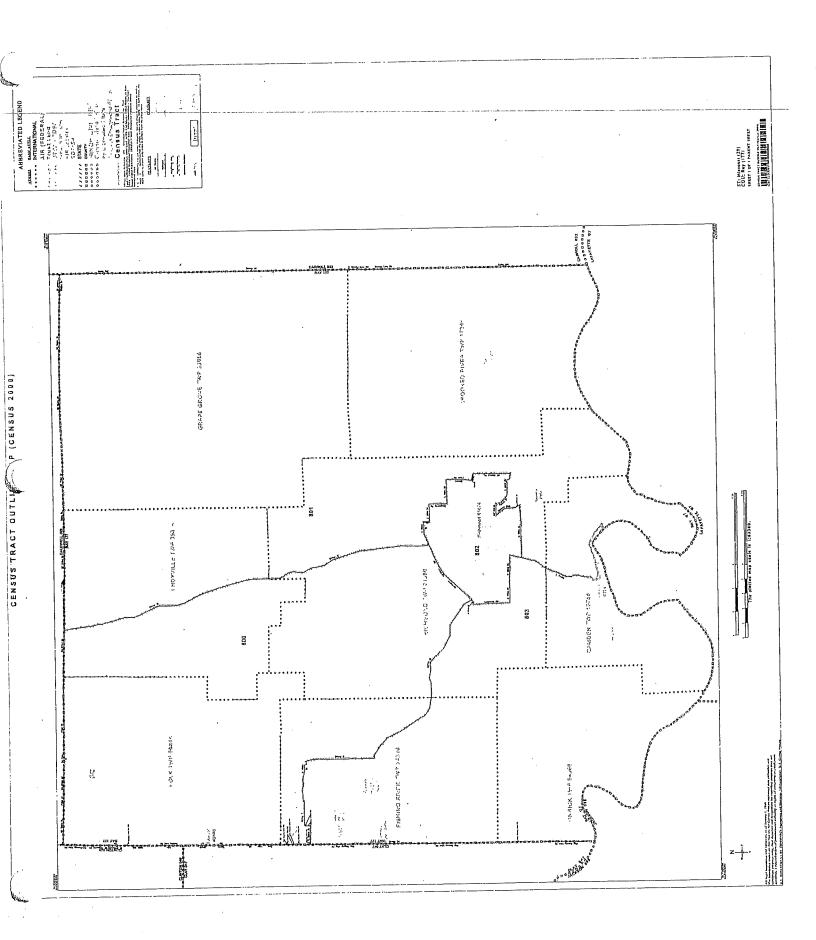
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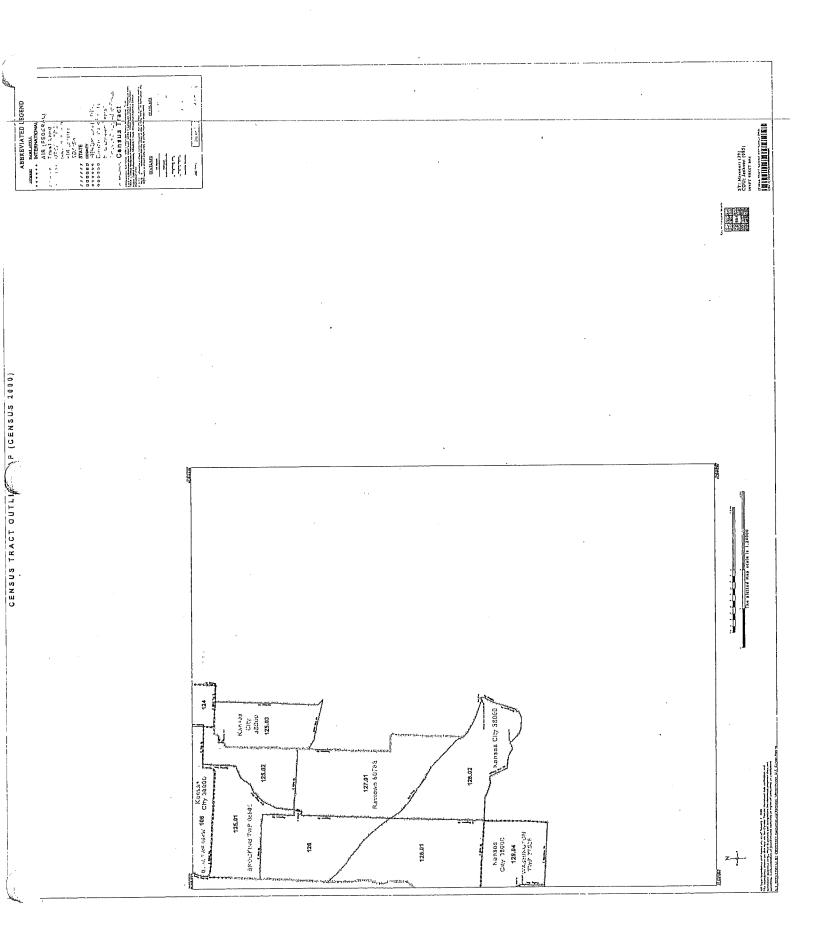
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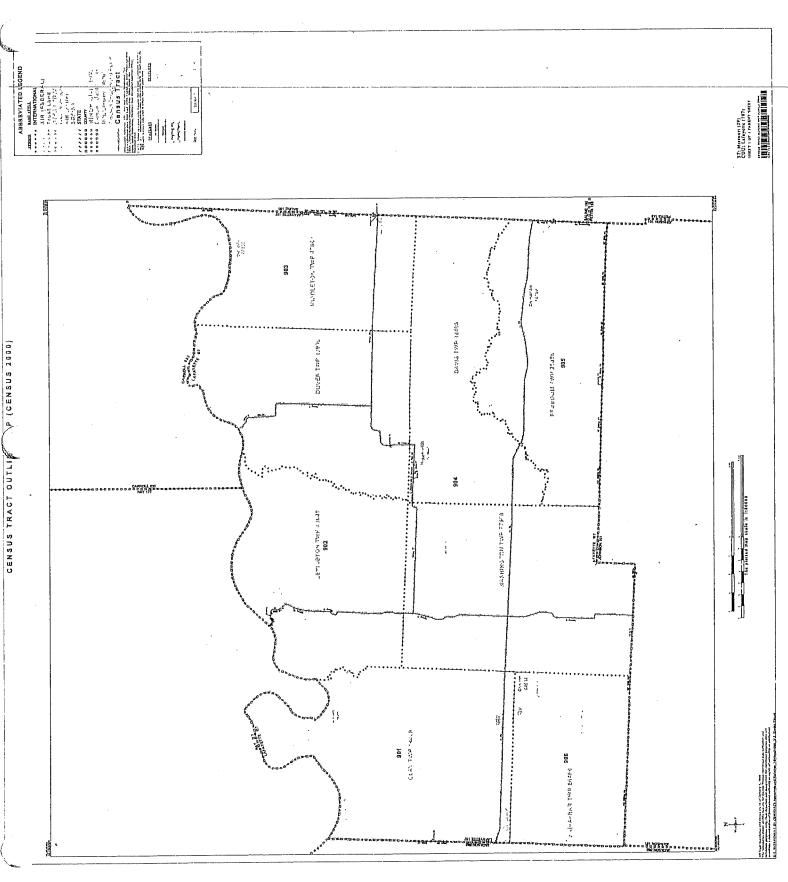
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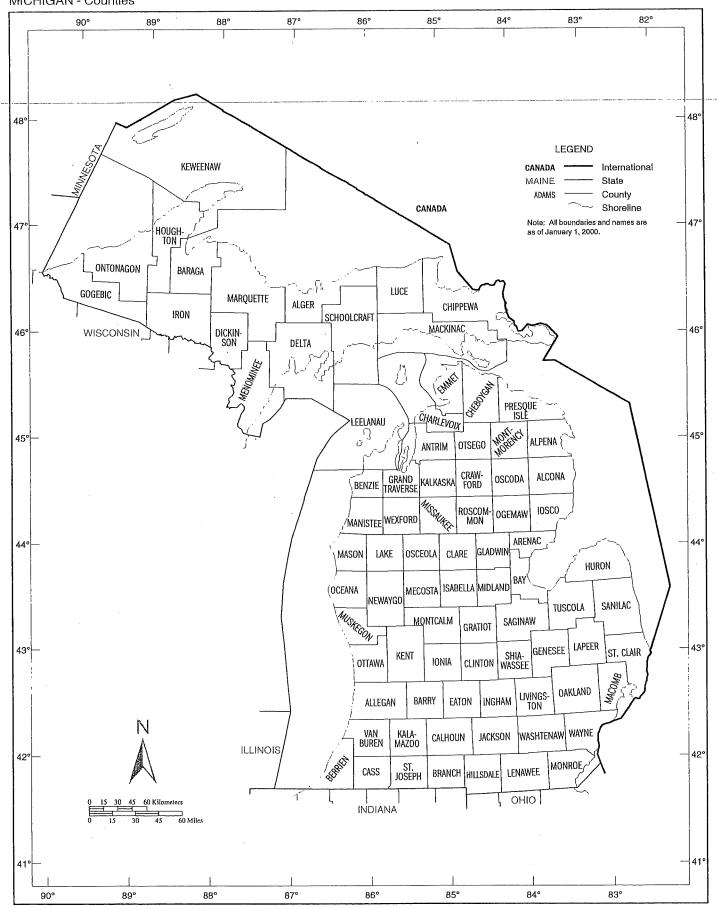
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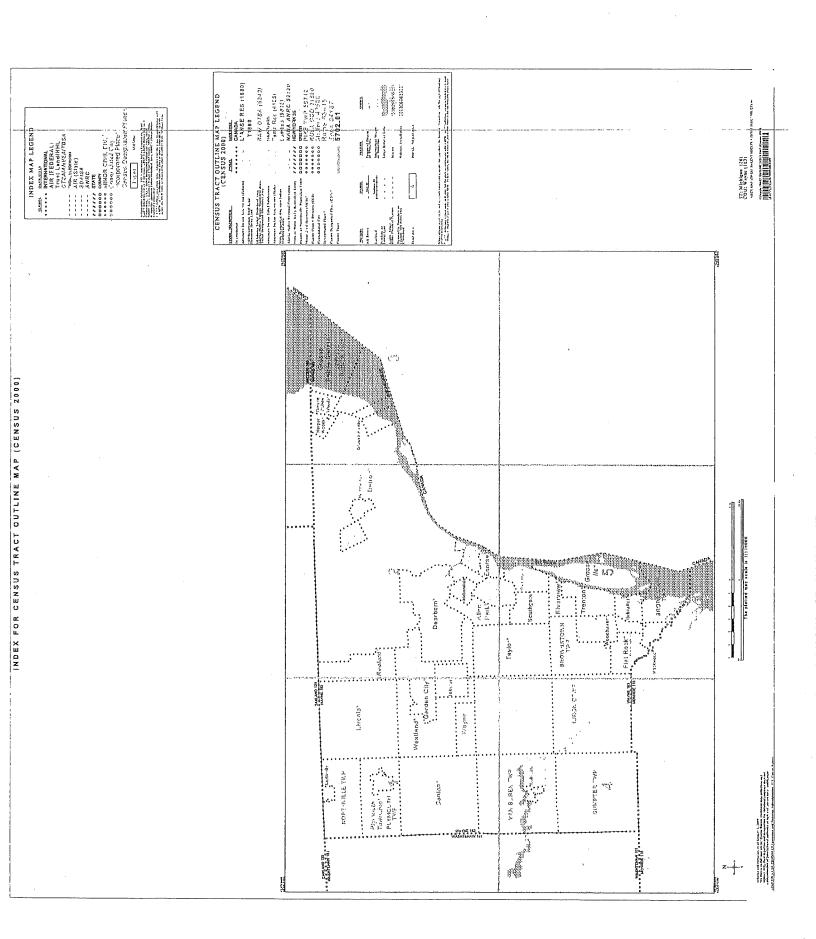
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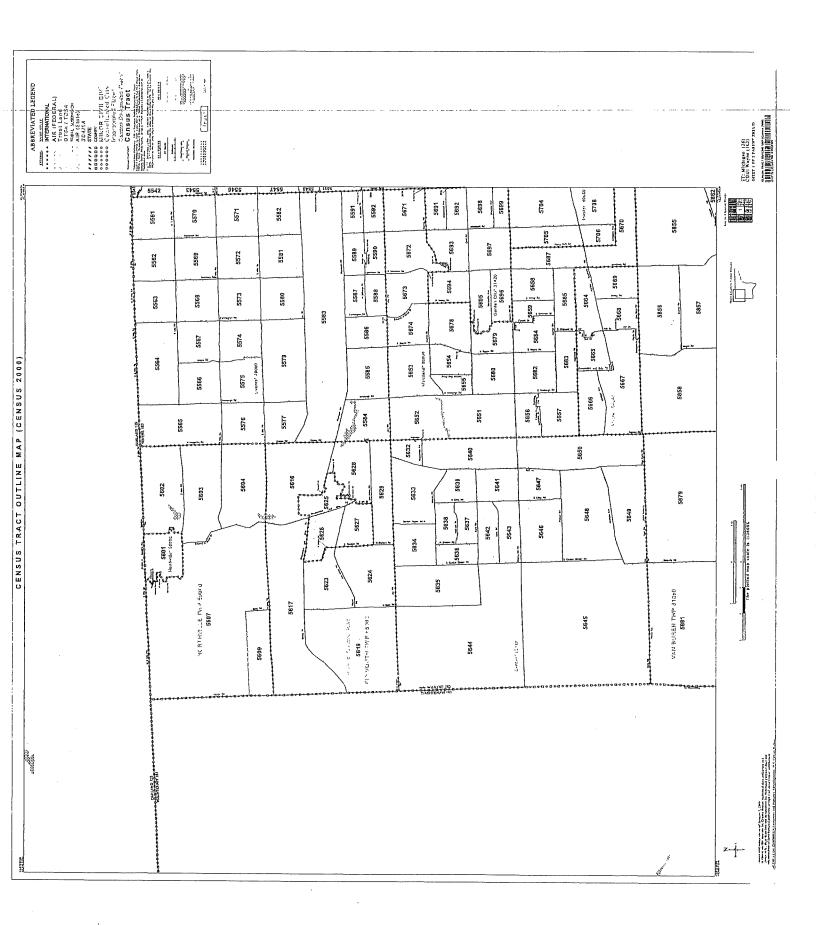


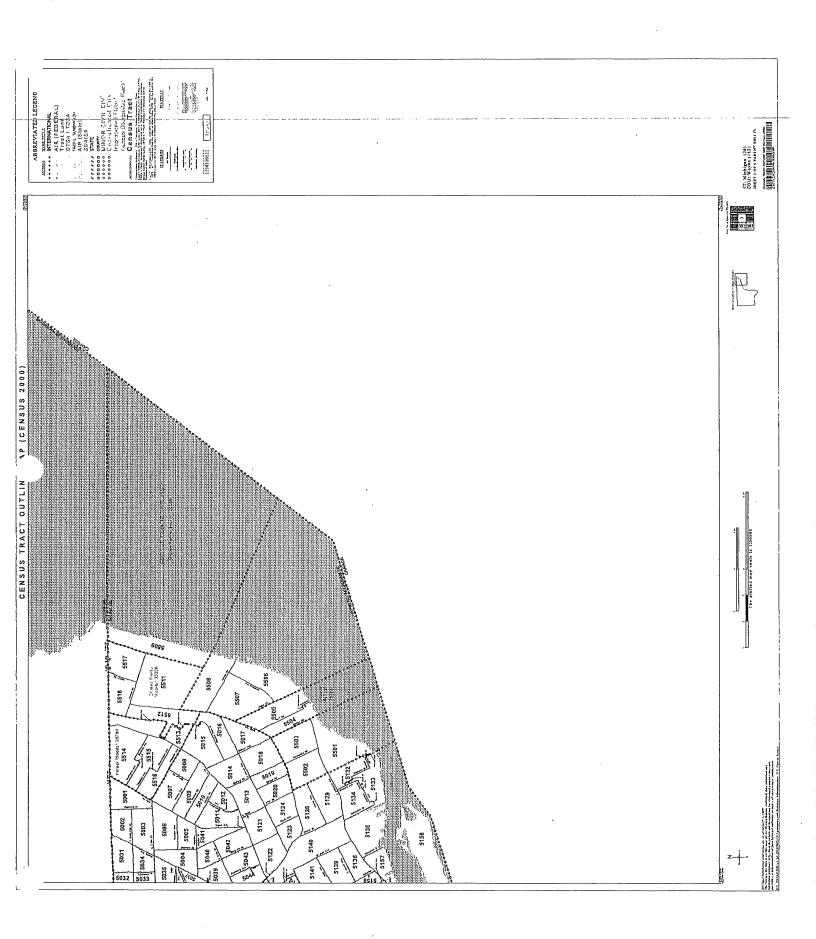
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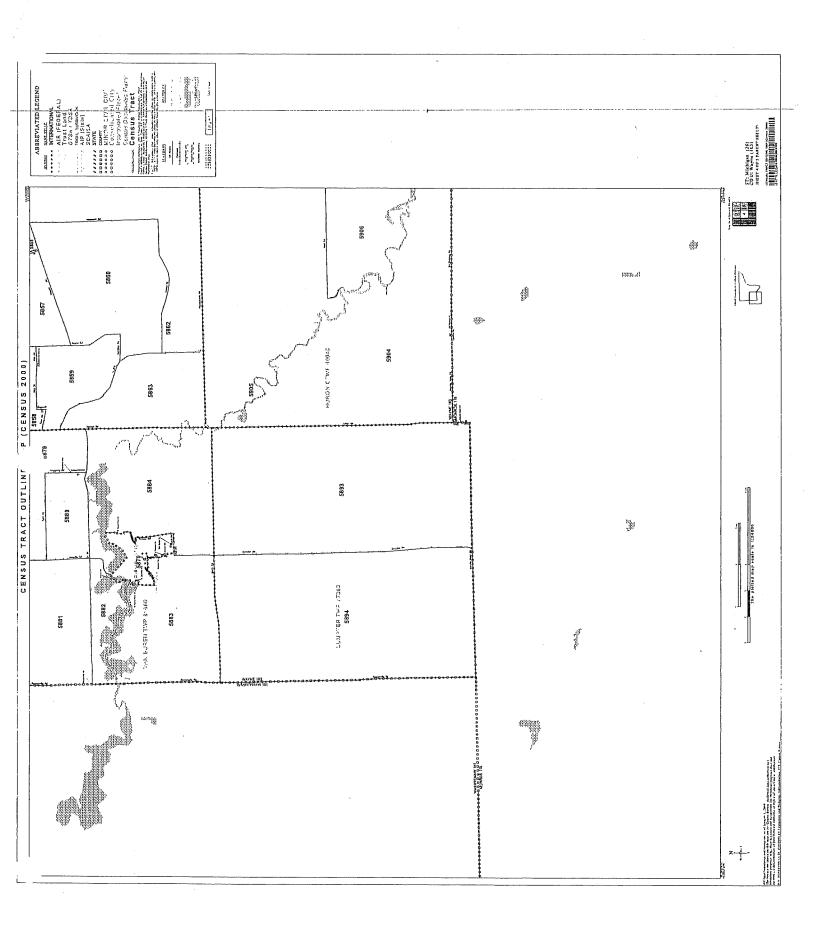
Detroit Assessment Area

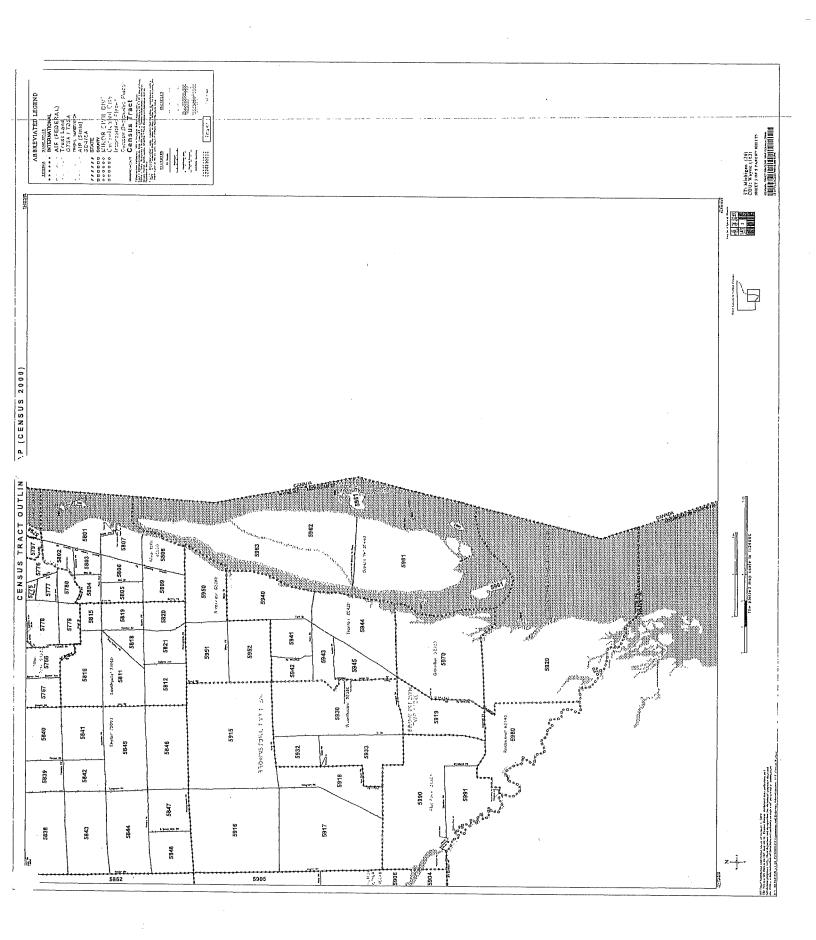














Loan to Deposit Ratios - 2023

12/31/2023

Net Loans and Leases - \$568,623.00 / Total Deposits - \$906,793 = 62.8%

09/30/2023

Net Loans and Leases - \$592,122.00 / Total Deposits - \$906,854 = 61.7%

06/30/2023

Net Loans and Leases - \$550,604.00 / Total Deposits - \$949,649 = 58.00%

03/31/2023

Net Loans and Leases - \$539,678.00 / Total Deposits - \$942,636 = 57.3%

Q



Disclosure reports

 $\mathsf{MSA}/\mathsf{MD}.$ They are based on the most recent data submission made in each filing period. To MSA/MD dropdown after choosing an institution. find an institution's IRS (Institution Register Summary), select "Nationwide" from the These reports summarize lending activity for individual institutions, both nationwide and by

Looking for other HMDA data? Visit the new HMDA Data Browser to filter and download HMDA datasets. To learn about modifications to these reports over the years, visit the $\underline{A\&D\ Report\ Changes}$ page.

1. <u>Year</u> 2022

2. Institution COMPANY -LIBERTY BANK AND TRUST

3. MSA/MD nationwide

4. Report -IRS Institution Register Summary

5493000JTK0IPSNDA832

Institution: 5493000JTK0IPSNDA832

Home Mortgage Disclosure Act Institution Register Summary for 2022

Nationwide

Save se CSV

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mail@example.com

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Return to top

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TOTAL	Washington-Arlington-Alexandria, DC-VA-MD-WV	Warren-Troy-Farmington Hills, MI	MSA/MD NOT AVAILABLE	MSA/MD NOT AVAILABLE	Tallahassee, FL	Springfield, MO	Shreveport-Bossier City, LA	Pittsburgh, PA	Philadelphia, PA	New Orleans-Metairie, LA	Montgomery, AL	Memphis, TN-MS-AR	Louisville/Jefferson County, KY-IN	Los Angeles-Long Beach-Glendale, CA	Little Rock-North Little Rock-Conway, AR	Las Vegas-Henderson-Paradise, NV	Lafayette, LA	Kansas City, MO-KS	Jacksonville, FL	Jackson, MS	Houston-The Woodlands-Sugar Land, TX	Hattiesburg, MS	Greenville-Anderson, SC	Greensboro-High Point, NC	Grand Rapids-Kentwood, Mi	Gary, IN	Fort Lauderdale-Pompano Beach- Sunrise, FL	reign () prop reserve.
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Disclosure reports

MSA/MD dropdown after choosing an institution. find an institution's IRS (Institution Register Summary), select "Nationwide" from the $\ensuremath{\mathsf{MSA/MD}}$. They are based on the most recent data submission made in each filing period. To These reports summarize lending activity for individual institutions, both nationwide and by

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1. <u>Year</u> 2021

2. Institution LIBERTY BANK AND TRUST

5493000JTK0IPSNDA832

COMPANY -

3. MSA/MD

nationwide

4. Report Institution Register Summary

-RS

Institution: 5493000JTK0IPSNDA832 Home Mortgage Disclosure Act Institution Register Summary for 2021

38.130.231

Nationwide

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