



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks  
Washington, DC 20219

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**PUBLIC DISCLOSURE**

July 06, 2004

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

**The Lawrenceburg National Bank  
Charter Number 7497**

**838 North College Street  
Harrodsburg, KY 40330**

**Comptroller of the Currency  
Louisville Field Office  
9200 Shelbyville Road, Suite 505  
Louisville, KY 40222**

**NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, 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

The Lawrenceburg National Bank (LNB) is a \$145 million intrastate bank headquartered in Lawrenceburg, Kentucky. LNB is wholly owned by Farmers Capital Bank Corporation, a multi-bank holding company. The bank's market and its two branches are located in Anderson and Mercer Counties, Kentucky. There are two offices in Anderson County and the bank's main office in Mercer County. LNB did not have any mergers or acquisitions during this evaluation period.

LNB's primary lending focus is home mortgage loans and consumer loans. LNB also makes loans to small businesses and farms in the area. As of June 30, 2004, LNB had net loans to total assets of 71 percent. The loan portfolio consists of mostly 1-4 Family Residential mortgages (36 percent) with consumer loans accounting for 20 percent of the portfolio. In addition, the bank's portfolio consists of the following: Non-Farm Non-Residential - 16 percent, Construction and Development - 9 percent, Commercial loans - 7 percent, Farmland - 6 percent, Multi-farm loans - 3 percent, Ag loans - 2 percent, and Municipal loans - 1 percent.

LNB delineated one assessment area (AA), which includes all of Anderson and Mercer Counties. This AA is in a non-metropolitan area and consists of 9 geographies. There are no low- or moderate-income geographies. The geographic makeup includes three (33 percent) middle-income areas and six (67 percent) upper-income areas. The AA is legal and the bank did not arbitrarily exclude any low- and/or moderate-income geographies.

Competition is considered strong and involves significant competition from a large number of financial institutions. As of June 30, 2003, LNB has the largest deposit market share (23.30 percent) within their market.

We contacted two community organizations to ascertain the community and credit needs in the AA. A local economic development organization stated a need to continue recruiting industry to the area to further reduce the unemployment rate. A low-income housing organization indicated a need for more affordable home financing along with more flexible underwriting criteria.

There are no legal, financial, or other factors impeding LNB's ability to help meet the credit needs in its AA. As of June 30, 2004, LNB had Net Tier 1 Capital of \$11 million or approximately 8 percent of total assets.

LNB was rated "Satisfactory" at its last CRA evaluation dated October 4, 1999.

## **Evaluation Period**

We performed a full-scope review in the non-metropolitan AA (Anderson and Mercer Counties).

We evaluated LNB's mortgage, consumer, and small business/small farm lending using data for the period beginning January 1, 2000 through December 31, 2003. For community development loans, investments and services, our evaluation period runs from the ending date of the last CRA examination which is October 4, 1999, through July 06, 2004, the starting date of this evaluation.

The bank does not have an office located in a metropolitan statistical area, and therefore, is not subject to the Home Mortgage Disclosure Act (HMDA) that requires certain home mortgage data collection.

## Overall CRA Rating

**INSTITUTION'S CRA RATING:** This institution is rated Satisfactory.

The following table indicates the performance level of **The Lawrenceburg National Bank** with respect to the lending, investment, and service tests]:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Due to LNB's business focus, we gave the greatest weight to home mortgage loans. It was also given weight because a significant amount of the home mortgage lending consisted of affordable housing loans for low- and moderate-income families. Affordable housing is a significant credit need as indicated by the community groups we contacted. Our rating of the bank's performance takes this information into consideration.

The major factors that support this overall rating and conclusions with respect to performance tests:

### Lending

Refer to Table 1 through 13 in Appendix C for facts and data used to evaluate the bank's lending.

Performance is rated outstanding. The distribution of small loans to businesses and farms as well as borrower distribution among the different income levels for mortgages was excellent. In addition, LNB made six community development loans and they offer customer access to flexible affordable housing products on the secondary market.

- LNB's lending activity is excellent. The bank's deposit market share of Anderson and Mercer Counties combined is 23 percent, which compares favorably with its small business loan market share of 7.63 percent. Market share for loans reportable under the Home Mortgage Disclosure Act was not available as this bank is not subject to HMDA.
- We calculated the inside/outside ratio at the bank level and found that a substantial majority of loans and other lending-related activities are in the bank's AA. The bank originated 95 percent of its home mortgage loans, 84 percent of its small business loans, and 97 percent of its small farm loans in the AA.

- A review of the bank's geographic distribution of loans was not performed, as the analysis would not be meaningful since there are no low- or moderate-income geographies identified within either the 1990 or the 2000 U.S. Census. However, the loan sampling performed as part of our data integrity review indicates LNB's lending activity is spread throughout its market. We identified no conspicuous gaps in lending within the AA of Anderson and Mercer Counties.
- LNB's distribution of small loans to businesses and farms was excellent. Loans to businesses with revenues of \$1 million or less represented approximately 97 percent of the bank's reportable loans, which was greater than the 69 percent of area businesses with revenues of less than \$1 million. Loans to farms with revenues of \$1 million or less represented 100 percent of the bank's reportable loans, which was greater than the 96 percent of area farms with revenues of less than \$1 million. (Note: This is based upon information as of Year End 2003.)
- LNB's overall distribution of home mortgage loans reflects excellent penetration among individuals of different income levels. LNB granted 8 percent of its mortgage loans to low-income individuals, which is below the 11 percent of low-income families in the area. However, 40 percent of its mortgage loans were made to moderate-income individuals, which significantly exceeds the 12 percent of families within that income level.
- Community development lending positively impacted the bank's rating. LNB originated six qualified loans totaling \$852 thousand, representing approximately eight percent of LNB's tier one capital. This volume is favorable because all of this money went to projects for affordable housing for low- and/or moderate-income families. Affordable housing is an identified credit need in the AA.
- While LNB offers traditional lending products within their AA, they have also developed a loan product called Easy Line. This is a consumer loan product that provides borrowers with small lines of credit to use for consumer purchases. This product was developed to meet the needs of those borrowers requiring small dollar loans. These borrowers are typically low- or moderate-income individuals. In addition, they offer access to affordable housing loan products on the secondary market, and VA and FHA loans through the Federal Home Loan Program. Under these programs, they have made 96 loans for a total of \$9.3 million. Lastly, LNB has been involved with the Welcome Home Program through the FHLB since 2003, which is a program that provides financial grants to low- or moderate-income families to help with the costs of obtaining a loan. LNB has made ten loans through this program for a total of \$827 thousand. All of these loans involved the completion of affordable housing units for low- or moderate-income borrowers.

## Investments

In evaluating the bank's volume of investments, we considered community development opportunities in the AA, as well as the capacity for the local infrastructure to create qualified investments. We determined that opportunities for qualified investments are very limited as most community development activities are either federally or state funded. Locally, the most prominent community development organizations consist of the Anderson County Chamber of Commerce, the Mercer County Chamber of Commerce, Harrodsburg-Mercer County Industrial Authority, and the Habitat for Humanity. Housing needs are primarily met through services provided by Kentucky Housing Corporation, a federally funded program, that serves the entire state of Kentucky. They provide home loans to low- and moderate-income persons at below market interest rates and require little or no down payment. They also provide homeownership counseling. On a local level, the Anderson County and the Mercer County chapters of the Habitat for Humanity is an initiative that works for affordable housing. Based upon this information, we placed significant weight on the fact that opportunities to make qualified investments other than donations are limited.

Refer to Table 14 in Appendix C for facts and data used to evaluate the bank's level of qualified investments.

Performance under the investment test is rated low satisfactory.

- The volume of LNB's investments is satisfactory due to the limited opportunities available to them and the level of effort the bank makes to find available opportunities. LNB's investments were primarily donations to the local chapters of the Chamber of Commerce, the Habitat for Humanity, Christmas programs specifically designed to buy gifts for low- and moderate-income children, school programs specifically offered to low- and moderate-income children, and to local organizations that assist low- and moderate-income individuals in medical situations. During the review period, the bank made 54 donations for a total of \$17 thousand.

## Services

In evaluating LNB's services, we considered the bank's size in relation to the size of the AA as well as the absence of any low- or moderate-income geographies in the AA.

Refer to Table 15 in Appendix C for facts and data used to evaluate the distribution of the bank's branch delivery system, and branch openings and closings.

Performance under the service test is rated low satisfactory.

- LNB's delivery systems are accessible to essentially all geographies and individuals of different income levels in the AA. Full financial services and drive-thru service are offered at all of the offices. In addition, the bank has three full-service ATM's located throughout the AA.
- The bank has not opened or closed any branches during our period of review.

- LNB's hours of operation are considered good. While individual branches may differ in the exact hours of operation, typical lobby hours are Monday through Friday from 8:30 A.M. until 4:00 P.M. with extended lobby hours on Friday until 6:00 P.M. Drive-through banking is available at all three offices with all offering extended hours on Friday until 6:00 P.M. In addition, two of the branches, along with their drive-thru windows are open on Saturday mornings until 11:30 A.M.
- LNB has various checking and deposit products, including Internet banking service and TABS, a toll free, 24-hour service providing customer account access, allowing funds transfers, account verification, and deposit verification. The bank also offers free cashing of government checks for both bank and non-bank customers. Since the bank could not provide specific information on how low- and moderate-income individuals are impacted by Internet banking service or TABS, significant weight was not placed on alternate delivery systems when drawing conclusions in the AA.
- Overall, LNB's community development services are considered adequate given the moderate opportunities for CD services in the AA. Employees of LNB have served in several organizations in the community that provide general services to low- and moderate-income persons as well as help attract businesses and affordable housing to the area.

Some of the organizations that LNB currently participates with include, but are not limited to:

1. Anderson County Chamber of Commerce: The primary purpose of this organization is promoting, establishing, and maintaining businesses in Anderson County, most of which are small businesses. A senior bank officer has been involved with the Chamber of Commerce as a Board member since 2000. As a Board member, he provides financial expertise regarding a bank's perspective on new businesses and the financial needs of those businesses.
2. Anderson County Industrial Authority: The main purpose of this foundation is to recruit business and industry to Anderson County, which would employ mostly low- and moderate-income individuals. A director of this bank has been a board member of this organization since 2000. He also provides financial expertise to the organization as questions arise regarding potential financing needs of those businesses being recruited.
3. Mercer County Chamber of Commerce: The primary purpose of this organization is promoting, establishing, and maintaining businesses in Mercer County, most of which are small businesses. A senior bank officer was involved with the Chamber of Commerce as a Board member in 2000 and 2001. As a Board member, he provided financial expertise regarding a bank's perspective on new businesses and the financial needs of those businesses.
4. Harrodsburg-Mercer County Industrial Authority: The main purpose of this foundation is to recruit business and industry to Harrodsburg and Mercer County. These businesses would employ mostly low- and moderate-income individuals. A senior bank officer has been a Board member of this organization since 2000 and also provides financial expertise to the organization as questions arise regarding potential financing needs of those businesses being recruited.



5. Homan Committee: This is a nonprofit group dedicated to helping low- and moderate-income families that are in financial need. A senior bank officer has been a Board member and Treasurer for this organization since 2000 and provides ongoing financial advise to the organization.
6. Other organizations that bank officers either serve as Board members or provide financial expertise to include: the Lawrenceburg Renaissance, United Way Heart of Kentucky (local chapter) and United Way of Mercer County.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## **Appendix A**

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# Appendix B: Market Profiles for Full-Scope Areas

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### Market Profiles for Areas Receiving Full-Scope Reviews

Anderson and Mercer County – Non-metropolitan Area.....B-2

**Anderson and Mercer Counties – Kentucky – Non-metropolitan Area**

Demographic Information for Full-Scope Area: Anderson and Mercer Counties - Kentucky						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.00	0.00	22.22	77.78	0.00
Population by Geography	39,928	0.00	0.00	22.51	77.49	0.00
Owner-Occupied Housing by Geography	12,116	0.00	0.00	20.90	79.10	0.00
Businesses by Geography	1,836	0.00	0.00	23.15	76.85	0.00
Farms by Geography	183	0.00	0.00	23.50	76.50	0.00
Family Distribution by Income Level	11,672	11.32	11.85	18.73	58.10	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	2,704	0.00	0.00	33.47	66.53	0.00
Median Family Income HUD Adjusted Median Family Income for the AA (described above) Households Below the Poverty Level	\$34,625 \$38,600 20.37%	Median Housing Value Unemployment Rate (avg for the 2 counties)				\$62,400 3.70%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2003 HUD updated MFI

## Appendix C: Tables of Performance Data

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**Table 1. Lending Volume**

LENDING VOLUME	Geography: ANDERSON-MERCER		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2003				% of Rated Area Deposits in MA/AA ...					
	% of Rated Area Loans (#) in MA/AA*		Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
MA/Assessment Area:												
Full Review:												
LNB Lawrenceburg	100.00	40	2,888	298	11,958	572	6,192	6	852	916	21,890	100.00

\* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2000 to July 6, 2004.

\*\*\* Deposit Data as of August 05, 2004. Rated area refers to either the state, multi-state MA, or institution, as appropriate.

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**Table 8. Borrower Distribution of Home Mortgage Loans**

Borrower Distribution: HOME MORTGAGES		Geography: ANDERSON-MERCER		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2003											
MA/Assessment Area:	Total Home Mortgage Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
LMB Lawrenceburg	40	100.00	11.32	7.50	11.85	40.00	18.73	27.50	58.10	25.00	NA	NA	NA	NA	NA

**Full Review:**

\* Based on Peer Mortgage Data: NA, bank is not a HMDA Reporter.  
 \*\* As a percentage of loans with borrower income information available.  
 \*\*\* Percentage of Families is based on the 2000 Census information.  
 \*\*\*\* Home mortgage loans originated and purchased in the MA/AA as a percentage of all home mortgage loans originated and purchased in the rated area, (mortgages include home purchase, refinance, and home improvement loans).



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**Table 11-a Borrower Distribution of Small Loans to Businesses (2000-2002)**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ANDERSON-MERCER	Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002		Market Share*				
		Loans by Original Amount Regardless of Business Size							
Total Small Loans to Businesses	Businesses With Revenues of \$1 million or less	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less			
#	% of Total**	% BANK Loans****	% of Businesses***	% of Businesses***					
MA/Assessment Area:									
Full Review:									
LNB Lawrenceburg	208	100.00	74.90	99.52	91.35	7.21	1.44	7.63	17.65

**Table 11-b. Borrower Distribution of Small Loans to Businesses (2003)**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ANDERSON-MERCER	Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003		Market Share*				
		Loans by Original Amount Regardless of Business Size							
Total Small Loans to Businesses	Businesses With Revenues of \$1 million or less	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less			
#	% of Total**	% BANK Loans****	% of Businesses***	% of Businesses***					
MA/Assessment Area:									
Full Review:									
LNB Lawrenceburg	90	100.00	68.68	96.67	87.78	7.78	4.44	7.63	17.65

\* Based on 2002 Peer Small Business Data: US and PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

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**Table12-a. Borrower Distribution of Small Loans to Farms (2000-2002)**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ANDERSON-MERCER	Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002		Market Share*		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size		
	#	% of Total**	% of Farms***	% BANK Loans****	> \$100,000 or less	> \$250,000 to \$1,000,000	All
LNB Lawrenceburg	434	100.00	95.48	100.00	99.31	0.46	55.16
<b>Full Review:</b>							
						0.23	55.60

**Table12-b. Borrower Distribution of Small Loans to Farms (2003)**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ANDERSON-MERCER	Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003		Market Share*		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size		
	#	% of Total**	% of Farms***	% BANK Loans****	> \$100,000 or less	> \$250,000 to \$1,000,000	All
LNB Lawrenceburg	138	100.00	96.17	100.00	96.38	3.62	55.16
<b>Full Review:</b>							
						0.00	55.60

\* Based on 2002 Peer Small Business Data: US and PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

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**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ANDERSON-MERCER		Evaluation Period: OCTOBER 5, 1999 TO JULY 7, 2004		Unfunded Commitments**		
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments		Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)		#
LNB Lawrenceburg	0	0	54	17	54	17	0	0
<b>Full Review:</b>								
						100.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS												Geography: ANDERSON-MERCER			Evaluation Period: OCTOBER 5, 1999 TO JULY 7, 2004		
MA/Assessment Area:	Deposits			Branches				Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)			# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			% of Population within Each Geography					
				Low	Mod	Upp			Low	Mod	Upp	Low	Mod	Upp			
LNB Lawrenceburg	0.00	3	100.00	0.00	0.00	33.33	66.67	0	0	0	0	0	0	0.00	0.00	22.51	77.49
<b>Full Review:</b>																	

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**Table 15-a. Distribution of Branch and ATM Delivery System**

Distribution of Branch and ATM Delivery System		Geography: ANDERSON-MERCER		Evaluation Period: OCTOBER 5, 1999 TO JULY 7, 2004												
MA/Assessment Area:	Deposits	Branches			ATMs			Population								
		% of Total Bank Deposits	# of Bank Branches	Location of Branches by Income of Geographies (%)			% of Total Bank ATMs	Location of ATMs by Income of Geographies			% of Population within Each Geography					
				Low	Mod	Upp		Low	Mod	Upp	Low	Mod	Upp			
LNB Lawrenceburg	0.0	3	0	0	1	2	3	100.00	0	0	1	2	0.00	0.00	22.51	77.49

Full Review: