



PUBLIC DISCLOSURE

June 10, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Savings & Loan Association, FSB
Charter Number 704846

5151 South 4th Street
Leavenworth, Kansas 66048

Office of the Comptroller of the Currency

7101 College Boulevard, Suite 1600
Overland Park, Kansas 66210

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable.
- The bank originated a substantial majority of its loans by both dollar and number in the bank's assessment area (AA).
- The bank has a reasonable record of lending to borrowers in low- and moderate-income (LMI) geographies.
- The bank has a reasonable record of lending to borrowers of different incomes.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

Citizens Savings & Loan Association, FSB's (CSLA) quarterly average LTD ratio is reasonable. The bank's quarterly LTD ratio averaged 58.1 percent from March 31, 2014 to March 31, 2019. The average quarterly LTD ratio for five similarly situated institutions over the same period is 59.7 percent with a range from a low of 37.1 percent to a high of 82.9 percent. CSLA ranked fourth out of the five financial institutions in asset size serving the AA. The asset size of the institutions ranged from \$173.4 million to \$469.6 million, with an average asset size of \$265.7 million.

Lending in Assessment Area

CSLA originated a substantial majority of loans inside its AA.

CSLA originated and purchased 88.2 percent of its loans by number and 85.4 percent of its loans by dollar inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	134	92.4	11	7.6	145	21,252	85.5	3,592	14.5	24,844
2017	116	90.6	12	9.4	128	21,070	92.0	1,829	8.0	22,899
2018	118	81.9	26	18.1	144	20,334	79.2	5,330	20.8	25,664
Total	368	88.2	49	11.8	417	62,656	85.4	10,751	14.6	73,407

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0.

Description of Institution

CSLA is a \$179 million federally chartered single-state mutual federal savings bank that operates its main office and branches in the Kansas City, MO-KS multi-state metropolitan statistical area (MMSA). The AA consists of Leavenworth County, Kansas in the Kansas City, MO-KS metropolitan statistical area (MSA) AA. CSLA operates three offices that offer a range of loan and deposit products, two deposit-taking ATMs, and two cash dispensing only ATMs. Three of the ATMs are located at bank facilities and one cash dispensing ATM is located remotely. CSLA did not open or close any branches during the evaluation period. CSLA has one branch located in a low-income census tract (CT), the main bank office is located in a moderate-income CT, and the third location is in a middle-income CT. CSLA has no affiliates or subsidiaries.

CSLA's primary business focus is residential real estate lending. CSLA retains and services the majority of the loans that it originates. As of December 31, 2018, the bank's loan portfolio, by dollar volume, consisted of 95.4 percent residential real estate loans, 1.0 percent multi-family loans, 1.0 percent construction loans, 1.6 percent commercial loans, and 1.0 percent consumer loans. Net loans and leases were 41.9 percent of average assets. Total deposits were at \$131 million. Net tier 1 capital was \$37.8 million, or 20.6 percent of average total assets.

CSLA received a satisfactory rating at its previous CRA examination dated February 3, 2014. There are no legal, financial, or other constraints limiting CSLA's ability to meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The CRA evaluation determines the bank's record of meeting community credit needs. The Office of the Comptroller of the Currency (OCC) used a combination of bank and examiner generated loan and/or demographic reports to assess the bank's CRA performance. Consistent with CSLA's business strategy, the bank's primary product by dollar and number is home mortgage loans. The evaluation period for the lending test is January 1, 2016 through December 31, 2018. The OCC placed greater weight on performance in 2017 and 2018 since this is based on American Community Survey Census Data that is more recent.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the MSA, MMSA, or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

CSLA has only one AA. All weighting for the evaluation is placed on the Kansas City, MO-KS MMSA/Leavenworth AA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that CSLA has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

State Rating

State of Kansas

CRA rating for the State of Kansas¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- CSLA has a reasonable record of lending to borrowers in LMI geographies for home mortgages.
- CSLA has a reasonable record of lending to borrowers of different incomes for home mortgages.

Description of Institution's Operations in Kansas AA

CSLA's primary business focus is residential real estate lending. The June 30, 2018 FDIC Deposit Market Share Report ranked CSLA third out of 9 financial institutions with 11.4 percent of the deposit market share in the AA. Major competitors include national banks, regional banks, local community banks, credit unions, and other nonbank financial institutions operating in the AA and nationwide with deposits ranging from \$42.4 million to \$300.6 million in the AA. Competitors include Armed Forces Bank, First State Bank and Trust, and Mutual Savings Association, FSA. The top two institutions in the AA have 42 percent of the deposit market share. These institutions have total assets ranging from \$182.7 million to \$300.6 million. Lending competition is strong in the AA.

Rental units represent 33.2 percent of the total housing available in the AA and 93 percent of those units are occupied. The primary employer in the bank's AA is Fort Leavenworth, which houses the War College and sees a large number of US and foreign military personnel transitioning through the area. Other major employers include the military prison at Fort Leavenworth and other state and local prisons. The VA hospital is also a major employer in the area.

Within the AA, 85.5 percent of the housing units, including rental units, are located in middle- and upper-income CTs. Only 9 percent of the AA's housing in low- or moderate-income CTs is owner-occupied while 25.3 percent is renter-occupied. Single-family housing in LMI CTs represents only 14 percent of the housing in the AA. Families below the poverty level represent 8.3 percent of total families in the AA. The AA is home to four major prisons whose adult population is 6.8 percent of the AA's total population. Prisoners are counted as part of the census and are included in the AA's population; however, their poverty rates are not included. While the AA's poverty rate is officially 8.3 percent, it is most likely significantly higher due to the prison populations.

Examiners reviewed one recent community contact that stated the overall local economy is good and stable with high employment. The contact indicated that there is economic growth and more affordable housing than in other local communities with financial institutions offering low down payment programs. The contact noted that home mortgages are easy to obtain and that there is heavy competition

¹ This rating reflects performance within the MMSA. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

in the area for these mortgages. The contact also noted that start-up businesses experience more difficulty in obtaining credit and financing due to a lack of performance history.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2017-2018 Leavenworth AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	6.3	12.5	62.5	18.8	0.0
Population by Geography	78,227	2.3	10.4	59.8	27.4	0.0
Housing Units by Geography	28,999	4.1	11.4	61.9	22.6	0.0
Owner-Occupied Units by Geography	17,772	1.0	8.0	70.0	21.0	0.0
Occupied Rental Units by Geography	8,975	8.3	17.0	47.6	27.1	0.0
Vacant Units by Geography	2,252	11.5	16.3	55.5	16.8	0.0
Businesses by Geography	3,032	12.2	11.1	54.9	21.9	0.0
Farms by Geography	199	2.5	4.5	79.4	13.6	0.0
Family Distribution by Income Level	19,130	17.7	16.2	23.2	42.8	0.0
Household Distribution by Income Level	26,747	21.9	14.1	18.1	46.0	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$146,676
			Median Gross Rent			\$985
			Families Below Poverty Level			8.3%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Kansas

Evaluation Period/Products Evaluated

The CRA evaluation determines the bank's record of meeting community credit needs. The OCC used a combination of bank and examiner generated loan and/or demographic reports to assess the bank's CRA performance. Consistent with CSLA's business strategy, the bank's primary product by dollar and number is home mortgage loans. The evaluation period for the lending test is January 1, 2016 through December 31, 2018. Examiners placed greater weight on performance in 2017 and 2018 since this is based on American Community Survey Census Data that is more recent.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or CSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details

regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

CSLA has only one AA. All weighting for the evaluation is placed on the Kansas City, MO-KS MMSA/Leavenworth AA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Satisfactory and based on a full-scope review.

The lending analysis is based on the bank's lending strategy and primary product originations. CSLA is primarily a home mortgage lender and an analysis of the bank's lending for 2016 and separately for 2017-2018 shows that by both dollar and by number, home mortgages are CSLA's primary product.

Distribution of Loans by Income Level of the Geography

CSLA exhibits a reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the bank's home mortgage loans originated in LMI geographies is reasonable. The proportion of loans originated in these areas was generally comparable to the proportion of owner-occupied units and the aggregate distribution of loans in those geographies.

The proportion of home mortgage loans originated in the low-income geography is comparable to both the owner-occupied housing units and the aggregate distribution of home mortgage loans in this geography. There is a very limited population and a low number of owner-occupied homes available in the low-income geography. A large part of the area is commercial in this tract.

The proportion of home mortgage loans originated in moderate-income geographies is comparable to both the owner-occupied housing units and the aggregate distribution of home mortgage loans in those geographies. The limited number of moderate-income geographies, low number of housing units available, and competition, limit CSLA's lending opportunities in these areas. There are a significant number of rental units in the moderate-income geographies due to the close proximity of the military base. Refer to the Description of Institution's Operations above for additional information.

The bank's performance in 2016 for lending in LMI geographies was consistent with the bank's performance in 2017-18.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of home mortgage loans to borrowers of different income levels, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

CSLA's distribution of home mortgage loans to LMI borrowers for calendar years 2017 and 2018 is reasonable. The distribution rate of 15 percent is only slightly below the 16.2 percent ratio of moderate-income families in the AA. In addition, lending data for the AA indicates that aggregate lending for all institutions represents a 20.7 percent distribution rate to moderate-income borrowers.

While CSLA's distribution of home mortgage loans to low-income borrowers at 6.8 percent is significantly below the ratio of low-income families in the AA at 17.7 percent, it is comparable to the aggregate lending of all institutions in the AA of 8.7 percent. Performance compared to demographics is mitigated based on the percent of families below the poverty level of 8.3 percent and the additional information referenced in the paragraph below.

The bank's and industry's performance was adversely affected by increases in the median home value over the last six years, which has limited lending opportunities for LMI families. The Housing Price Index for the AA has steadily increased for the last three years rising from 121 to 137. Based on the AA median income of \$72,623, the calculated income for LMI families is \$36,000 and up to \$58,809, respectively. Housing costs are increasing, which affects the ability of LMI borrowers to purchase homes.

CSLA's performance has been further affected by the number of military and government jobs with high turnover rates. In addition, CSLA's largest competitor with over 26 percent of the market share is a military bank with local and nationwide market presence. The AA also houses a substantial prisoner population with four major prisons. Adult inmates comprise approximately 6.8 percent of the AA's population.

Responses to Complaints

CSLA did not receive any written complaints about its CRA performance during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	January 1, 2016 – December 31, 2018	
Bank Products Reviewed:	Home Mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
No affiliates, N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
State of Kansas	Full-Scope	Leavenworth County, KS

Appendix B: Summary of MMSA and State Ratings

RATINGS	Citizens Savings & Loan Association, FSB
Overall Bank:	Lending Test Rating
Citizens Savings & Loan Association, FSB	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A CT delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A CT with a median family income that is less than 50 percent.

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 state/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
2016 Leavenworth AA	134	21,252	100.0	2,889	1.7	0.0	0.7	22.2	21.6	19.9	44.5	20.1	40.6	31.7	58.2	38.8	0.0	0.0	0.0	
Total	134	21,252	100.0	2,889	1.7	0.0	0.7	22.2	21.6	19.9	44.5	20.1	40.6	31.7	58.2	38.8	0.0	0.0	0.0	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
2017-2018 Leavenworth AA	234	41,404	100.0	2,418	1.0	0.4	1.1	8.0	6.0	7.8	70.0	51.3	66.1	21.0	42.3	25.0	0.0	0.0	0.0	
Total	234	41,404	100.0	2,418	1.0	0.4	1.1	8.0	6.0	7.8	70.0	51.3	66.1	21.0	42.3	25.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
2016 Leavenworth AA	134	21,252	100.0	2,889	17.0	8.2	7.3	17.4	11.9	15.4	22.1	28.4	21.2	43.4	50.7	34.6	0.0	0.7	21.6	
Total	134	21,252	100.0	2,889	17.0	8.2	7.3	17.4	11.9	15.4	22.1	28.4	21.2	43.4	50.7	34.6	0.0	0.7	21.6	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
2017-2018 Leavenworth AA	234	41,404	100.0	2,418	17.7	6.8	8.7	16.2	15.0	20.7	23.2	24.4	23.7	42.8	53.4	30.8	0.0	0.4	16.1	
Total	234	41,404	100.0	2,418	17.7	6.8	8.7	16.2	15.0	20.7	23.2	24.4	23.7	42.8	53.4	30.8	0.0	0.4	16.1	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0.