



PUBLIC DISCLOSURE

July 29, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Murray Bank
Charter Number 715834

405 South 12th Street
Murray, Kentucky 42072

Office of the Comptroller of the Currency

10200 Forest Green Boulevard
Suite 501
Louisville, Kentucky, 40223

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.

Table of Contents

OVERALL CRA RATING	1
SCOPE OF THE EVALUATION	3
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	3
STATE RATING	4
STATE OF KENTUCKY	4
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS	B-1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-1

Overall Community Reinvestment Act (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 Murray Bank's (TMB or bank) loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of the bank's loans are inside its Assessment Area (AA).
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The bank's overall geographical distribution of residential mortgage and business loans reflects reasonable dispersion.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The bank's average net LTD ratio for the 13 quarters since the last CRA evaluation was 72.5 percent. The LTD ranged from a quarterly low of 66.2 percent to a quarterly high of 82.2 percent. Six similarly situated institutions averaged LTD ratios ranging from a low of 65.1 percent to a high of 93.8 percent during the same time period.

Despite strong competition and limited growth opportunities in the market area, TMB's loan portfolio grew by 29.5 percent during the evaluation period. The Board of Directors and management continue to focus on growth within the bank's assessment area while similarly situated banks are expanding beyond Calloway County, Kentucky for new lending opportunities.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated 81.4 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	59	84.3	11	15.7	70	\$7,573	76.6	\$2,316	23.4	\$9,889
Business	55	78.6	15	21.4	70	\$6,077	77.8	\$1,733	22.2	\$7,810
Total	114	81.4	19	18.6	140	\$13,650	77.1	\$4,049	22.9	\$17,699

Description of Institution

TMB is a full-service, intrastate financial institution headquartered in Murray, Kentucky. TMB is wholly owned by BancKentucky, Inc., a one-bank holding company also headquartered in Murray, Kentucky. TMB operates three-full service branches in Calloway County. All of which are equipped with full-service automated teller machines (ATMs). The bank additionally operates five stand-alone cash machines located in businesses throughout Calloway County. TMB has not opened or closed any branches, or made any significant changes to its corporate structure since the prior CRA evaluation.

TMB serves Calloway County through an offering of traditional banking products and services. TMB's offers a variety of home mortgage, consumer, and business loans. Primary business loan products include those secured by commercial real estate, non-real estate secured commercial and industrial loans, and agricultural-related loans. Retail loan products include loans secured by residential real estate, including home equity lines of credit, and other consumer purpose credit. TMB also offers deposit products for individuals and businesses including checking accounts, a variety of savings accounts, and certificates of deposit (CDs). Many of the bank's services can be accessed through mobile and online banking platforms.

As of March 31, 2019, the TMB reported \$305.2 million in total assets, \$274.5 million in deposits, \$221.7 million in net loans and leases, and \$28.9 million in tier 1 capital. Net loans represented 72.24 percent of average assets. Loans secured by 1-4 family residential real estate represent the largest percentage of the TMB's loan portfolio at 44.70 percent. This includes home equity lines of credit. Commercial real estate loans account for 26.58 percent of the bank's March 31, 2019 portfolio. The remainder of the bank's portfolio consists of agricultural loans (13.12 percent), non-real estate secured commercial and industrial loans (10.14 percent), consumer loans (4.51 percent), and other loans (0.95 percent).

TMB has designated one AA for CRA purposes. The AA includes all of Calloway County, Kentucky, which is not part of a metropolitan statistical area (MSA). The county is comprised of nine complete census tracts (CTs). TMB's AA does not arbitrarily exclude any low- or moderate-income CTs, nor does it reflect illegal discrimination.

TMB faces strong competition for banking services within its AA. Ten Federal Deposit Insurance Corporation (FDIC)-insured institutions operate one or more branches in Calloway County. According to the June 30, 2018 FDIC Market Share Report, TMB ranked first holding 31.4 percent of deposits in the AA, followed by Branch Banking and Trust Company (19 percent), and Community Financial Services Bank (14.2 percent). The remaining seven institutions each hold 10 percent or less of AA deposits.

There are no legal or financial impediments affecting TMB's ability to meet the credit needs of its AA. The last CRA evaluation was performed by the Office of the Comptroller of the Currency (OCC) on May 23, 2016. The bank received a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted an evaluation of TMB's CRA performance using the OCC's Small Bank (SB) CRA examination procedures. These procedures assess an institution's record of meeting credit needs through its lending activities. Conclusions regarding the bank's lending performance were based on a random sample of the bank's primary loan products originated between January 1, 2016 and December 31, 2018. The bank's primary loan products during the evaluation period were residential real estate and business loans based on dollar volume and number originated.

Selection of Areas for Full-Scope Review

TMB has one AA, Calloway County, in the State of Kentucky. This AA was selected for a full-scope review. Refer to *Appendix A: Scope of Examination*, for information on the full-scope AA.

Ratings

The bank's overall rating is based on performance in TMB's designated AA. In assessing performance, equal weight was placed on home mortgage lending performance and business loans. However, more weight was given to borrower income distribution performance than the geographical distribution as there were no low- or moderate-income CTs in the AA prior to 2017.

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 this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Kentucky

CRA rating for the State of Kentucky: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- TMB's LTD ratio is reasonable given the institution's size, financial condition, and credit needs of the AA.
- A substantial majority of the bank's loans are within its AA.
- The distribution of loans among borrowers of different income levels and businesses of different sizes is reasonable.
- The overall geographical distribution of loans reflects reasonable dispersion.

Description of Institution's Operations in Kentucky

As previously noted, the bank operates three branch locations within its one AA, Calloway County, Kentucky. The 2010 U.S. Census divided the AA into nine CTs: five middle-income and four upper-income. As a result of the 2015 United States ACS census data, the income designation of four census tracts changed in 2017. There are now two moderate-income, four middle-income, and three upper-income tracts. There are no low-income tracts located within the bank's AA. A description of TMB and its operations in Kentucky can be found in the *Description of the Institution* section of this evaluation on pages 2 and 3.

Table A below provides demographic information of TMB's AA. The AA's median family income of \$45,920 is slightly below that of the State of Kentucky. According to Bureau of Labor statistics, the annual unemployment rates for Calloway County in 2016, 2017, and 2018 were 4.6 percent, 4.4 percent, and 3.9 percent, respectively. These figures were below the statewide unemployment rates of 5.1 percent, 4.9 percent, and 4.3 percent during the same time period. The percentage of families in the AA living below the poverty level was just below the national average of 14 percent. In addition, 33.2 percent of households receive social security and 19.1 percent are retired.

One community contact in TMB's assessment area described the Calloway County economy as very strong and growing with new industry. The contact indicated local banks exhibit a willingness to lend to small businesses and assist community development organizations that help promote new industry and the economy of Calloway County.

Calloway County

Table A – Demographic Information of the Assessment Area

Assessment Area: Calloway County: 2015 ASC Census and 2018 D&B Data

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	22.2	44.4	33.3	0.0
Population by Geography	38,106	0.0	23.9	37.0	39.1	0.0
Housing Units by Geography	18,237	0.0	27.7	35.8	36.5	0.0
Owner-Occupied Units by Geography	9,355	0.0	11.4	37.4	51.2	0.0
Occupied Rental Units by Geography	5,479	0.0	56.8	25.8	17.4	0.0
Vacant Units by Geography	3,403	0.0	25.6	47.4	27.0	0.0
Businesses by Geography	2,242	0.0	30.8	36.6	32.6	0.0
Farms by Geography	209	0.0	9.1	33.5	57.4	0.0
Family Distribution by Income Level	8,561	18.4	14.7	17.1	49.7	0.0
Household Distribution by Income Level	14,834	28.7	12.1	15.4	43.8	0.0
Median Family Income Non-MSAs – GA		\$45,920	Median Housing Value			\$123,238
			Median Gross Rent			\$586
			Families Below Poverty Level			13.7%

Source: 2015 ASC. Census and 2018 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.

Scope of Evaluation in Kentucky

TMB’s overall rating is based solely on the full-scope review of performance in the Calloway County AA. Please refer to *Appendix A: Scope of Examination* for a description of the AA and the loan products reviewed. As indicated earlier, in assessing TMB’s performance at meeting AA credit needs, equal weight was placed on home mortgage and small business loans. More weight, though, was given to the bank’s distribution of loans to borrowers of different income levels and businesses of different size than to geographical distribution performance. This is due to the AA having no low- or moderate-income CTs in the AA prior to 2017.

LENDING TEST

The bank’s performance under the Lending Test in Kentucky is rated Satisfactory.

Based on full-scope review, TMB’s lending performance in the state of Kentucky is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA.

Home Mortgage Loans

Refer to Table O in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. Our sample found reasonable dispersion of home mortgage loans across geographies of TMB's AA taking into account the bank's size, financial condition, business focus, and area demographics.

As there are no low- or moderate-income CTs in the AA prior to the CT changes in 2017, we did not assess the geographical distribution of home mortgage loans in 2016. In addition, the AA did not contain any low-income CTs in 2017 and 2018. However, the AA contained two moderate income CTs in 2017 and 2018. While TMB's percentage of home mortgage loans originated within the moderate-income CTs in 2017-2018 is slightly below both the demographic and aggregate comparators, it nonetheless represents reasonable penetration in relation to the bank's size, financial condition, area demographics, and needs of the AA.

Small Loans to Businesses

Refer to Table Q of *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses. Our sample found satisfactory dispersion of business loans across geographies in the bank's AA.

As there were no low- or moderate-income CTs in the AA prior to the CT changes in 2017, we did not assess the geographical distribution of business loans for 2016. For 2017 and 2018, the AA contained two moderate-income CTs that contained 30.70 percent of the AA's businesses. During 2017-2018, TMB originated nearly 26 percent of their loans to small businesses located in moderate-income CTs. This is reasonably comparable to the demographics of the AA, as well as to the percentage of small business loans originated in the moderate-income CTs by all reporting lenders (28.3 percent).

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P of *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. Our sample found reasonable penetration of home mortgage to low- and moderate-income borrowers.

In 2016, TMB's percentage of home mortgage loans to low-income borrowers lagged the demographic comparator. However, TMB's percentage of home mortgage loans to low-income borrowers was more than double the percentage by all reporting lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was slightly below the percentage of moderate-income families and the aggregate distribution. TMB's performance of home mortgage lending to low-and moderate-income borrowers was similar in 2017-2018.

While TMB's percentage of home mortgage loans to low- and moderate-income borrowers is below demographic comparators, TMB's performance is reasonable based on several factors. The percentage of families with below poverty level income rose over the evaluation period from 9.7 percent in 2016 to 13.7 percent in 2017-2018. Due to limited financial resources, families with incomes below the poverty level generally do not have the capacity to support a home mortgage, limiting the demand and opportunity for lending to LMI borrowers. In addition, the median housing value in Calloway County also constrains lending opportunities to LMI borrowers. The median housing value for 2016 was \$108,065 and \$123,238 for 2017-2018.

Small Loans to Businesses

Refer to Table R of *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses. TMB's distribution of loans to small businesses reflects satisfactory performance.

In 2016, TMB's percentage of loans to businesses with revenues less than \$1 million was slightly below the percentage of businesses reporting revenue of \$1 million or less. However, TMB's percentage of loans to small businesses greatly exceeded the percentage of small business loans by all reporting lenders. In 2017-2018, TMB's percentage of small business loans was slightly above the demographic comparator, and again well above the aggregate distribution.

Responses to Complaints

TMB did not receive any written complaints regarding 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 21, 2018	
Bank Products Reviewed:	Home mortgage and small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Kentucky		
Calloway County	Full-scope	

Appendix B: Summary of State Ratings

RATINGS	The Murray Bank
Overall Bank:	Lending Test Rating
The Murray Bank	Satisfactory
State:	
Kentucky	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/assessment area.

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. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts 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 census tract delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

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/assessment area. 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 assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - 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 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
Calloway County	35	\$4,843	100	766	0.0	0.0	0.0	0.0	0.0	0.0	55.3	54.3	52.9	44.7	45.7	47.1	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 2017-2018

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
Calloway County	35	\$3,683	100	638	0.0	0.0	0.0	11.4	8.6	11.3	37.4	42.9	40.0	51.2	48.6	48.7	0.0	0.0	0.0

Source: 2015 ASC Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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
Calloway County	35	\$4,843	100	766	13.5	8.6	3.3	11.4	8.6	11.9	23.1	22.9	21.1	52.1	60	45.6	0.0	0	18.1

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 **2017-2018**

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
Calloway County	35	\$3,683	100	638	18.4	5.7	2.5	14.7	8.6	12.9	17.1	22.9	20.7	49.7	62.9	47.3	0.0	0	16.6

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Calloway County	35	\$3,267	100	507	0.0	0.0	0.0	0.0	0.0	0.0	61.1	54.3	58.8	38.9	45.7	41.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Calloway County	35	\$6,291	100	452	0.0	0.0	0.0	30.7	25.7	28.3	37.3	28.6	36.1	32.0	45.7	35.6	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Calloway County	35	\$3,267	100	507	84.1	80.0	45.0	4.4	20.0	11.5	0.0	
<i>Source: 2010 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Calloway County	35	\$6,291	100	452	84.0	85.7	50.0	4.4	14.3	11.7	0.0	
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												