

# **LIBERTY SAVINGS BANK, F.S.B.**

## COMMUNITY REINVESTMENT ACT PUBLIC INFORMATION FILE

AS OF APRIL 1, 2024



# **LIBERTY SAVINGS BANK, F.S.B.**

## **Community Reinvestment Act Public Information File**

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# SECTION 1

## Public Comments



March 1, 2024

To Whom It May Concern:

For the period beginning January 1, 2022, to the present date, Liberty Savings Bank, F.S.B., has received only one written comment from the public that specifically relates to Liberty's CRA performance in the areas served by our bank. That comment and our response to it is attached to this letter.

Sincerely,

Sharon Herzog  
Vice President/Community Reinvestment Act Officer  
Liberty Savings Bank, F.S.B.

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Wilmington, Ohio 45177

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Member  
**FDIC**



**Liberty Savings Bank received the following written comment on August 7, 2023, regarding our CRA performance.**

*Since we are based in Florida, we want to share the following comments with the Bank regarding its CRA performance and request that they be placed in the Bank's CRA Public File:*

- 1. We are hoping the Bank will increase its lending in its 3 Assessment Areas (AAs), since only 12-13% of loans are there; many banks are downgraded to an NI rating solely on the basis of such a significant imbalance in that "in-out AA" ratio.*
- 2. The Bank's "wholesale banking model" will require numerous AAs if the proposed NPR becomes a Final Rule with its Retail Lending AA proposal, so the Bank should continue to monitor that proposal.*
- 3. We are hoping the Bank increases its LTD imbalance in FL, since 80% of deposits come from the FL AA but only 28% of home mortgage loans are reinvested there.*
- 4. This LTD imbalance is unfortunately the case for many bank branching in FL, where they gather deposits from our seniors and lend them elsewhere ([https://link.edgepilot.com/s/c8a11a63/Itju2ZQOi0Ge\\_XjRZSSneg?u=https://www.americanbanker.com/opinion/carpetbagger-banks-are-draining-my-city-of-loanable-funds](https://link.edgepilot.com/s/c8a11a63/Itju2ZQOi0Ge_XjRZSSneg?u=https://www.americanbanker.com/opinion/carpetbagger-banks-are-draining-my-city-of-loanable-funds)).*
- 5. Quite frankly, we are surprised the OCC gave the Bank a Sat. rating in FL with such an LTD imbalance, as that suggests a possible IBBEA Section 109 violation in FL? (<https://link.edgepilot.com/s/41379dda/s15lEb61QkKXUmOvz2hAkQ?u=https://www.occ.gov/news-issuances/news-releases/2023/nr-ia-2023-47a.pdf>)*
- 6. We are puzzled as to why the Bank's home office is in OH with the majority of branches in FL? With a main office in FL, perhaps the Bank's LTD imbalance in FL would be improved?*
- 7. We are hoping the Bank increases its lending to LMI borrowers in FL, which is generally below aggregate and demographic comparators.*
- 8. We are disappointed that the Bank did not originate any CD Loans in either FL (or CO), but rather relied on CD Investments for a passing CD Test rating; there is a very critical need for CD Loans in FL, esp. those related to Affordable Housing, our #1 credit need.*

**Liberty's response to this comment is as follows:**

Liberty Savings Bank, FSB was established in 1889 in Highland County, Ohio, with the primary purpose to support home ownership in the community. Over 130 years later, Liberty has expanded those efforts to a national scale. As of December 31, 2019, Liberty had total assets of roughly \$700 million. Despite being a relatively small institution, from 2017 to 2019 Liberty was able to leverage its national mortgage origination

platform to originate over \$162,000,000 in home mortgage loans within our Assessment Areas (“AA(s)”).

In Liberty’s Florida AAs during the 2017-2019 CRA evaluation period, the percentage of home loans to low and moderate income (“LMI”) borrowers exceeded peer.

Additionally, Liberty’s CRA Performance Evaluation for the 2017-2019 triennium notes the following with respect to Qualified Investments.

“Liberty’s qualified investment activity represents excellent responsiveness. During the evaluation period, Liberty made 19 qualified investments totaling \$9.2 million which equates to 18.4 percent of prorated tier 1 capital based on total deposit by AA. Qualified investments consist of mortgage-backed securities and donations to various non-profit organizations.

The bank purchased mortgage-backed securities relating primarily to mortgages granted to LMI borrowers in the amount of \$9.2 million. In addition, Liberty made 14 donations totaling \$29,000 that supports local affordable housing assistance to aid homeless veterans. Organizations include Habitat for Humanity of Sarasota, Habitat for Humanity South Sarasota, Habitat for Humanity Manatee County and Face of Hope.”

It was also noted by regulators that Liberty exhibits adequate responsiveness to community development needs through community development services. Liberty employees participated in 34 community development services during the evaluation period. Activities included Habitat for Humanity Board or committees, financial literacy for LMI audiences at Chamber of Commerce, Habitat for Humanity events, as well as teaching financial literacy at local schools.

As previously stated, Liberty has expertise in residential mortgage lending. As that has been a traditional focus, Liberty does not maintain nor currently have staff or systems that would allow origination of what would traditionally be considered “community development” loans as these are typically small business, multi-family, or commercial loans. Without the people or systems to support these loans, it would not be safe and sound for Liberty to attempt to deliver such products at this time.

Having said that, Liberty looks forward to the future as we seek to responsibly expand our product offerings to support all of our customers and to continue to do what we always strive to do, which is provide superior customer service to the best of our ability.

## SECTION 2

### Community Reinvestment Act Performance Evaluation

Dated August 14, 2023





Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

August 14, 2023

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Liberty Savings Bank, FSB  
Charter Number: 708039

2251 Rombach Ave.  
Wilmington, OH 45177

Office of the Comptroller of the Currency

4555 Lake Forest Drive  
Suite 520  
Blue Ash, OH 45242

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 Community Development Test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on the state rating and the following overall conclusions:
  - The bank's loan-to-deposit (LTD) ratio is reasonable.
  - The bank exhibits a reasonable geographic distribution of loans in the assessment area (AA).
  - The bank exhibits an excellent distribution of loans to individuals of different income levels in the AA.
- The Community Development (CD) Test rating is based on the state rating, which is overall satisfactory. Overall, the bank's level of qualified investments and CD services represent adequate responsiveness to CD needs, considering the bank's capacity and the need and availability of such opportunities for CD in the AA.

### Loan-to-Deposit Ratio

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

Over the 12 quarters since the previous Community Reinvestment Act (CRA) evaluation (January 1, 2020 – December 31, 2022), Liberty Savings Bank, FSB's (Liberty or bank) quarterly average LTD ratio is 79.4 percent. The ratio ranged from a high of 105.7 percent as of March 31, 2020, to a low of 66.1 percent as of June 30, 2021. The LTD ratio was 81.2 percent as of December 31, 2022. Liberty's quarterly average LTD ratio is reasonable when compared to similarly situated banks headquartered in the bank's AA (Manatee and Sarasota Counties, Florida) and surrounding counties (Polk, Hillsborough, Charlotte, DeSoto, and Hardee Counties, Florida), with total assets less than \$1.5 billion. Similarly situated banks include 11 financial institutions with a quarterly average LTD ratio of 67.2 percent, ranging from a high of 104.6 percent to a low of 43.6 percent. Of the 11 financial institutions, only one was headquartered in Sarasota or Manatee County, with an average LTD ratio of 61.7 percent. During the evaluation period, management sold substantial amounts of home mortgage loans on the secondary market, with the majority of home mortgage loans originated or purchased outside the AA.

### Lending in Assessment Area

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

The bank originated and purchased 7.9 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. The Office of the Comptroller of the Currency (OCC) considered the bank's non-traditional business model, consisting of a small, locally based retail deposit-taking operation in Sarasota and Manatee Counties in Florida, and mortgage lending originations primarily through mortgage brokers. During 2020 and 2021, the bank conducted business in many different states and participated in a substantial level of secondary market sales activity. Beginning in 2022, the bank transitioned to a retail branch network model for mortgage lending origination and began exiting the third-party loan originator program.

The OCC also considered Liberty's lending performance within the state of Florida where all their branches are located. From January 1, 2020, to December 31, 2022, approximately 851 home mortgage loans were originated and purchased in Florida, representing 18.7 percent of the total home mortgage loan originations and purchases during the evaluation period.

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	358	7.9	4,183	92.1	4,541	79,228	4.8	1,577,280	95.2	1,656,508
Source: 1/1/20 – 12/31/22 Bank Data (Home Mortgage Disclosure Act (HMDA) data). Due to rounding, totals may not equal 100.0%.										

## Description of Institution

Liberty is a full-service, interstate federally chartered stock savings bank headquartered in Wilmington, Ohio, with all full-service offices located in Florida. As of December 31, 2022, the bank had total assets of \$1.2 billion and \$102.9 million in tier 1 capital. Liberty is a wholly owned subsidiary of Liberty Capital, Inc., a single bank holding company also headquartered in Wilmington. As of August 2, 2021, the bank's administrative office in Clinton County, Ohio, relocated to a new location within the same county. There is no merger or acquisition activity that affects the scope of the bank's operations during the evaluation period.

Although Liberty is headquartered in Wilmington, Ohio, the Ohio office is not a financial center and is not open to the public for account transactions. The Ohio office is the bank's administrative headquarters, primarily serving employees, former employees (retirees), and the bank's corporate accounts. There is no automated teller machine (ATM) at this location. As of the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, approximately 12 percent of the bank's total deposits are in Ohio. There are no lending officers at this location and the bank does not originate home mortgage loans out of this office. The bank did not market any deposit or lending products out of the Ohio office during this evaluation period. Given that the office is not open to the public, the OCC will not rate the state of Ohio as part of this CRA performance evaluation.

The bank operates five full-service branches in Florida. Four of the five branches have ATMs, and all include drive-up facilities. As of the 2015 American Community Survey (ACS) U.S. Census data, four branches were in middle-income census tracts (CTs) and one was in a moderate-income CT (Bradenton, Florida) for 2020 and 2021. As of the 2020 U.S. Census data, all offices are in middle-income tracts beginning in 2022. On February 21, 2020, Liberty sold its Colorado branches; therefore, the state of

Colorado is not included in the scope of this evaluation period. No other offices have been opened or closed since the previous evaluation. For purposes of this CRA evaluation, Liberty has one rating area (Florida) and one AA in Florida. The AA in Florida includes Manatee and Sarasota counties in the North Port-Sarasota-Bradenton, Florida Metropolitan Statistical Area #35840 (MSA AA). The AA is contiguous, meets the requirements of the regulation, and does not reflect illegal discrimination or arbitrarily exclude any low- and moderate-income (LMI) areas. The AA is further described in the “Scope of the Evaluation” and “Description of Institution’s Operations in Florida” sections of this performance evaluation.

The bank offers a variety of traditional deposit products, including checking, savings, and certificates of deposit. The bank also offers online and mobile banking. Liberty launched an online banking subsidiary “MPH” in 2021, allowing for online account opening in exchange for rewards. MPH increases access to financial services for individuals of all income backgrounds. In 2022, Liberty began using a program called Raisin (formerly SaveBetter) to grow deposit accounts. Raisin is an online platform partnering with select financial institutions to provide customers access to various deposit products at competitive terms.

Liberty’s primary loan products include home mortgage loans (one-to-four family and multifamily), with a small volume of consumer and business loans. During the evaluation period, the bank’s principal line of business was mortgage banking, consisting of originating, purchasing, and selling one-to-four family mortgage loans. The originations and purchases were conducted almost exclusively through brokers in 2020 and 2021; however, the bank exited the third-party loan originator program by year-end 2022. During the evaluation period, the bank sold \$795 million in mortgages to the secondary market. As of the December 31, 2022, Consolidated Reports of Condition and Income (Call Report) and Uniform Bank Performance Reports (UBPR), Liberty’s net loans represent approximately 66.3 percent of its total assets. The composition of loans includes residential real estate (home mortgage) loans of 98.6 percent, consumer loans of 1.1 percent, and commercial and industrial loans and commercial real estate loans (business) of 0.3 percent. During the evaluation period, almost 100 percent of all loan originations and purchases were residential real estate loans.

Liberty’s lending activities are consistent with its size, expertise, financial capability, and local economic conditions. There are no financial, legal, or other factors that impede the bank’s ability to help meet the credit needs of its AA. Liberty received a Satisfactory rating for its CRA performance during the prior evaluation period. This rating was reported in the OCC’s CRA Performance Evaluation dated May 4, 2020.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The OCC conducted a CRA performance evaluation to assess the bank’s record of meeting the credit and CD needs of its entire community, including LMI areas. The OCC used intermediate small bank CRA evaluation procedures to assess the bank’s performance under the Lending and CD Tests. The evaluation period is January 1, 2020, through December 31, 2022.

The OCC evaluated the bank’s lending performance based on its primary lending product, home mortgage loans. The review included all home mortgage loans originated and purchased by the bank during the evaluation period using Home Mortgage Disclosure Act (HMDA) data.

For analysis purpose, the OCC compared the bank’s lending performance with demographic data from the 2015 ACS U.S. Census data for years 2020 and 2021, and the 2020 U.S. Census data for year 2022. Therefore, there will be two sets of tables in appendix D for the different census periods. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

### **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 metropolitan statistical area (MSA), multistate metropolitan statistical area (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 the 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.

Liberty has one AA in the North Port-Sarasota-Bradenton, FL MSA 35840 (MSA AA). There are two counties in this MSA, Sarasota and Manatee. The OCC completed a full-scope review of the MSA AA. This AA is further described above under the “Description of Institution” and “Description of Institution’s Operations in Florida” sections of this evaluation.

### **Ratings**

Liberty operates all branches in a single state. Since all the bank’s branches are in Florida, its overall rating is based on performance solely in Florida. The state of Florida rating is based on performance in the MSA AA. Given that the home office in Ohio is not open to the public and is an administrative office only, the OCC will not rate the state of Ohio as part of this CRA performance evaluation.

Home mortgage lending is the only primary product and was the only product to receive consideration in the rating. Refer to the “Scope of the Evaluation” section under the state of Florida section for more details.

### **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 Consumer Financial Protection Bureau, 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 Florida

**CRA rating for the State of Florida<sup>1</sup>: Satisfactory.**

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

**The Community Development Test is rated: Satisfactory.**

The major factors that support this rating include:

- Liberty exhibits a reasonable geographic distribution of loans in its AA.
- Liberty exhibits an excellent distribution of loans to individuals of different income levels in the AA.
- The bank's responsiveness to CD needs of the AA is overall adequate.

### Description of Institution's Operations in Florida

Liberty has one AA in Florida, the MSA AA. The AA is based on the bank's targeted lending area and office locations. The AA is contiguous, meets the requirements of the regulation, and does not reflect illegal discrimination, nor does it arbitrarily exclude LMI areas.

#### MSA AA

During the evaluation period, the MSA AA in Florida includes Sarasota and Manatee Counties in their entirety. The bank has five full-service offices, one in Manatee County (Bradenton) and four in Sarasota County (two in Sarasota and two in Venice). All offices have a drive-up facility and four have an ATM. As of 2020 and 2021, four of the five branches were in middle-income CTs, while one branch (Bradenton) was in a moderate-income CT. As of 2022, all branches are in middle-income CTs.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contact/credit needs provides additional performance context for Liberty's operations in Florida. The table below provides a summary of demographic data for the AA.

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

Demographic Information of the Assessment Area						
Assessment Area: MSA AA 2020 - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	174	2.3	24.7	45.4	26.4	1.1
Population by Geography	735,767	2.8	23.7	47.5	26.0	0.0
Housing Units by Geography	407,196	1.8	22.5	47.5	28.2	0.0
Owner-Occupied Units by Geography	221,993	1.0	18.3	50.7	29.9	0.0
Occupied Rental Units by Geography	87,917	4.5	33.8	43.7	18.1	0.0
Vacant Units by Geography	97,286	1.2	21.6	43.5	33.7	0.0
Businesses by Geography	149,530	1.4	19.6	43.6	35.4	0.0
Farms by Geography	4,202	2.3	20.2	44.1	33.3	0.0
Family Distribution by Income Level	194,874	19.4	19.1	21.0	40.5	0.0
Household Distribution by Income Level	309,910	23.1	17.1	18.1	41.7	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$62,814	Median Housing Value			\$210,725
			Median Gross Rent			\$1,020
			Families Below Poverty Level			8.4%
Source: 2015 ACS and 2021 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.						

Demographic Information of the Assessment Area						
Assessment Area: MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	217	2.3	22.1	45.6	28.6	1.4
Population by Geography	833,716	2.2	22.3	43.6	31.6	0.2
Housing Units by Geography	439,870	1.8	21.1	45.2	31.8	0.1
Owner-Occupied Units by Geography	255,124	1.2	18.1	46.7	33.8	0.2
Occupied Rental Units by Geography	84,449	3.9	31.6	42.9	21.5	0.1
Vacant Units by Geography	100,297	1.4	19.7	43.4	35.5	0.1
Businesses by Geography	171,572	1.3	15.8	46.3	36.3	0.3
Farms by Geography	4,713	2.0	20.7	45.8	31.1	0.4
Family Distribution by Income Level	216,689	18.8	19.6	20.4	41.2	0.0
Household Distribution by Income Level	339,573	22.0	17.7	18.5	41.8	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$77,172	Median Housing Value			\$295,896
			Median Gross Rent			\$1,304
			Families Below Poverty Level			6.1%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						



*Demographic Data*

As of the 2015 ACS U.S. Census data in the table above, the population of the MSA AA is 735,767, with 2.8 percent of the population living in low-income CTs, 23.7 percent in moderate-income CTs, 47.5 percent in middle-income CTs, and 26 percent in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consists of 174 CTs, and is comprised of four low-income, 43 moderate-income, 79 middle-income, 46 upper-income CTs, and two CTs that consists of geographies that have not been assigned an income classification (NA). The AA includes 194,874 families and 309,910 households.

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the MSA AA is 833,716, with 2.2 percent of the population living in low-income CTs, 22.3 percent in moderate-income CTs, 43.6 percent in middle-income CTs, 31.6 percent in upper-income CTs, and 0.2 percent in NA as the geographies have not been assigned an income classification. As of the 2020 U.S. Census, the AA consists of 217 CTs, and is comprised of five low-income, 48 moderate-income, 99 middle-income, 62 upper-income CTs, and three CTs that consists of geographies that have not been assigned an income classification (NA). The AA includes 216,689 families and 339,573 households.

*Affordable Housing Cost*

According to the 2015 ACS U.S. Census data, the median housing value is \$210,725. With the median family income of \$62,814, moderate-income families make less than \$50,251 annually and low-income families make less than \$31,407 annually. Median housing values are 4.2 times the annual income of moderate-income families and 6.7 times the annual income of low-income families; thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2015 ACS U.S. Census data show that there are 407,196 total housing units in the MSA AA, of which 54.5 percent are owner-occupied, 21.6 percent are rental-occupied, and 23.9 percent are vacant units. As of the 2015 ACS U.S. Census, 1956 was the weighted average of median year built for housing, with the median age of housing stock within the AA of 65 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 8.4 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 U.S. Census data, the median housing value is \$295,896. With the median family income of \$77,172, moderate-income families make less than \$61,738 annually and low-income families make less than \$38,586 annually. Median housing values are 4.8 times the annual income of moderate-income families and 7.7 times the annual income of low-income families; thus, the cost of housing may create a significant financial barrier to homeownership among these families. The 2020 U.S. Census data show that there are 439,870 total housing units in the MSA AA, of which 58 percent are owner-occupied, 19.2 percent are rental occupied, and 22.8 percent are vacant units. As of the 2020 U.S. Census, 1984 was the weighted average of median year built for housing, with the median age of housing stock within the AA of 38 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 6.1 percent of the families live below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

### Job Market and Economic Conditions

The economic conditions in the MSA AA have improved since the start of the COVID-19 pandemic. The unemployment rates in Manatee and Sarasota Counties and the state and national unemployment rates experienced a spike from April to July 2020, followed by a gradual recovery through the end of 2021. According to the U.S. Bureau of Labor Statistics as of December 2022, the “not seasonally adjusted” unemployment rate was 2.3 percent in Manatee County and 2.4 percent in Sarasota County, which is reasonable when compared with the state of Florida unemployment rate of 2.3 percent and the national unemployment rate of 3.3 percent for the same period.

	<b>Average Annual &amp; December 2022 Unemployment Rates</b>			
	Average 2020	Average 2021	Average 2022	December 2022
Manatee County	7.2	4.1	2.9	2.3
Sarasota County	7.2	4.0	2.9	2.4
State of Florida	8.2	4.7	2.9	2.3
United States	8.1	5.4	3.7	3.3

*Source: U.S. Bureau of Labor Statistics (not seasonally adjusted).*

According to Moody’s Analytics as of April 2023, the North Port-Sarasota-Bradenton MSA is in good shape with tourism and healthcare as key contributors. Diversified industries play a significant role in supporting employment within the AA. These industries include, but are not limited to, services, healthcare, tourism, and government agencies. Primary employers include Sarasota Memorial Health Care System, Bealls Inc., Publix Super Markets Inc., PGT Industries, Manatee Memorial Hospital, IMG Academy, and Sun Hydraulics.

### Competition

Competition for deposits is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the June 30, 2022, Deposit Market Share Report from the FDIC, 40 financial institutions with 233 offices operated in Manatee and Sarasota Counties. Liberty held the 10<sup>th</sup> largest deposit market share at 2.6 percent as of June 30, 2022, with \$815.7 million in total deposits, representing 88 percent of the bank’s total deposits. The bank’s primary competitors with significant deposit activity in the AA include Bank of America, National Association (N.A.), Truist Bank, Wells Fargo, N.A., JPMorgan Chase Bank, N.A., and Fifth Third Bank, N.A. These five banks hold almost 60.3 percent of the deposit market share.

Competition for home mortgage loans is also strong in the AA. As stated above, Liberty’s primary business focus is home mortgage lending. Liberty ranked 74<sup>th</sup> out of 1,059 lenders in the MSA AA in residential home mortgage volume based on 2021 Peer Mortgage Data and 2015 ACS U.S. Census data. Liberty had 0.2 percent of the lending market share, based on the number of loans, as of the 2021 Peer Mortgage Data Report, lending \$27.2 million (122 loans). Top mortgage lenders in the AA included Rocket Mortgage, United Wholesale Mortgage, and Wells Fargo, N.A., with a combined market share of 15.6 percent.

Based on 2022 Peer Mortgage Data and 2020 U.S. Census data, Liberty ranked 212<sup>th</sup> out of 1,004 lenders in the MSA AA in residential home mortgage volume. Liberty had 0.05 percent of the lending market share, based on the number of loans, as of the 2022 Peer Mortgage Data Report, lending \$4.3 million (18 loans). Top mortgage lenders in the AA included Rocket Mortgage, United Wholesale Mortgage, and Wells Fargo, N.A., with a combined market share of 13.7 percent.

*Community Contact/Credit Needs*

As part of the CRA performance evaluation, the OCC reviewed information provided from two meetings with representatives from various CD organizations. One contact shared that primary credit needs in the area include small business, home mortgage, and consumer loans. The contact also stated that approximately 25 percent of the population is unbanked. Both contacts identified a need for more affordable housing in the community. One contact also highlighted how inflationary pressure is increasing costs for low-income families and exacerbating community needs, with families facing higher food costs, living in food deserts, and poor and increasing costs of transportation options. In general, affordable and accessible transportation is an issue for the area and there is an overall need for redevelopment initiatives that are responsive to the community and address the issues.

**Scope of Evaluation in Florida**

The OCC performed a full-scope review of the MSA AA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation. Home mortgage lending is the bank's primary lending product and was evaluated under the Lending Test. As discussed above, the OCC used HMDA data for 2020, 2021, and 2022 for the home mortgage loan analysis. The OCC reviewed CD loans, qualified investments, and CD services for 2020, 2021, and 2022. Refer to the "Scope of the Evaluation" section for more details.

The MSA AA is the bank's primary lending and deposit area with all full-service offices located in Florida. According to the FDIC Deposit Market Share Report as of June 30, 2022, approximately 88 percent of the bank's total deposits are in the MSA AA. Home mortgage lending is the only primary product and the only product to receive consideration in the rating.

Given the bank's wholesale mortgage business model, the OCC also conducted a limited scope review of statewide lending outside the AA in the state of Florida. Aggregate HMDA data was not considered. Refer to the "Conclusions for Area Receiving a Limited Scope Review" section for more details.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA****LENDING TEST**

The bank's performance under the Lending Test in Florida is rated Satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's lending performance in the state of Florida is reasonable.

**Distribution of Loans by Income Level of the Geography**

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

***Home Mortgage Loans***

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to the percentage of owner-occupied housing units (demographic data) in the four geographic income categories, placing emphasis on the LMI geographies. The OCC also compared the bank's performance against the percentage of home mortgage loans of other mortgage lenders (aggregate data) in the AA, as demonstrated by HMDA aggregate data.

In determining the rating, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from other financial institutions, the number of LMI geographies, branch presence, area demographics, and the location of most owner-occupied housing.

#### MSA AA – 2020 and 2021

The bank exhibits an overall reasonable geographic distribution of home mortgage loans within the MSA AA. During the evaluation period, the percentage of home mortgage loans originated or purchased by the bank in low-income CTs is below both the demographic comparator and aggregate lending data of other HMDA reporters. However, aggregate data was only 0.4 percent, and the percentage of owner-occupied housing units was only 1 percent. The bank's percentage of lending in moderate-income CTs slightly exceeded aggregate data and was below demographic data, demonstrating overall satisfactory performance.

The OCC considered other factors contributing to limited lending opportunities within the LMI CTs, which include strong competition from other financial institutions. One of the five branches in the MSA AA was in a moderate-income CT in 2020 and 2021. Based on 2021 figures, approximately 18.3 percent of the of housing units are in the moderate-income tracts (91,418), with an overall poverty rate (based on families below poverty) of 8.4 percent and vacancy rate in the AA of 23.9 percent. Approximately 21.6 percent of the housing units are rental occupied. As of the 2015 ACS U.S. Census, 1956 was the weighted average of median year built for housing, with the median age of housing stock within the AA of 65 years. This may present an additional barrier to lending, given the cost of homeownership in older housing is typically higher than newer housing. Competition for loans is strong due to the volume of financial institutions in the AA. The top five financial institutions in home mortgage lending account for 21.2 percent of the home mortgage market share as of the 2021 Peer Mortgage Data report, with Liberty ranking 74<sup>th</sup> with 0.2 percent of the lending market share. These performance context factors provide further support for the bank's lending in LMI tracts.

#### MSA AA – 2022

The OCC could not perform a meaningful geographic analysis for 2022 as there was an insufficient number of home mortgage loans originated or purchased in the MSA AA in 2022.

### ***Lending Gap Analysis***

The OCC did not identify any unexplained, conspicuous gaps in the lending distribution during the review of bank reports and maps.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

## ***Home Mortgage Loans***

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

The OCC compared the percentage of home mortgage loans originated or purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level (demographic data), placing emphasis on lending to LMI families. The OCC also compared the bank's performance against home mortgage loans of other home mortgage lenders (aggregate data), as demonstrated by HMDA aggregate data.

### **MSA AA – 2020 and 2021**

The bank exhibits an overall excellent distribution of home mortgage loans among borrowers of different income levels within the MSA AA. Liberty's percentage of home mortgage loans to low-income borrowers significantly exceeds aggregate data and is below demographic data. Liberty's percentage of home mortgage loans to moderate-income borrowers exceeds both demographic and aggregate data, demonstrating overall excellent performance.

The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership in the AA as an obstacle to homeownership for low-income borrowers. As stated above, overall median housing values are 6.7 times the weighted average of the median family income of low-income families in the AA. This obstacle may result in fewer opportunities to originate mortgage loans to low-income families. Approximately 8.4 percent of the families live below the poverty level. Additionally, there is strong competition for loans in the MSA AA, as discussed above.

### **MSA AA – 2022**

The OCC could not perform a meaning analysis of the distribution of loans by income level of the borrower for 2022 as there was an insufficient number of home mortgage loans originated or purchased in the MSA AA in 2022.

## **Responses to Complaints**

Liberty received one complaint about its performance in helping to meet the AA's credit needs. The comment was related to the bank's lending performance in Florida, which was discussed in the May 4, 2020, CRA Performance Evaluation completed by the OCC. The comment was received in August 2023 and management will be responding to the comment.

## **Conclusions for Area(s) Receiving a Limited Scope Review**

Because of the bank's wholesale mortgage business model, the OCC also conducted a limited scope review of statewide lending outside the AA. Aggregate HMDA data was not considered. Based on this limited scope review, the bank's statewide lending test performance in Florida is weaker than the bank's overall performance in the MSA AA. However, the bank's statewide lending test performance in Florida is overall reasonable.

The OCC compared the percentage of home mortgage loans purchased or originated to low-, moderate-, middle-, and upper-income borrowers by the bank to the percentage distribution of families by income level (statewide demographic data), placing emphasis on lending to LMI borrowers.

In 2020 and 2021, the OCC observed 450 home mortgage loans in Florida outside the AA. The bank's level of home mortgage lending to low-income borrowers (3.1 percent) was well below demographic data (21.6 percent). Further, the bank's level of home mortgage lending to moderate-income borrowers (11.6 percent) was also below demographic data (17.8 percent).

In 2022, the OCC observed 43 home mortgage loans in Florida outside the AA. The bank's level of home mortgage lending to low-income borrowers (7 percent) was well below demographic data (21.1 percent). Further, the bank's level of home mortgage lending to moderate-income borrowers (11.6 percent) was also below demographic data (18.2 percent).

The OCC considered in its conclusion the bank's limited resources to develop and maintain safe and sound programs that could compete effectively on a statewide basis with national and regional banks. Performance in this limited-scope review had no impact on the overall Lending Test conclusions.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Florida is rated Satisfactory.

### Conclusions for Area(s) Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA. Management focused their CD efforts on qualified investments and CD services.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Liberty did not originate or purchase any qualified CD loans during the evaluation period. Management focused their CD efforts on qualified investments and CD services.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MSA AA	0	0	0	0

## Number and Amount of Qualified Investments

Assessment Area	Qualified Investments									
	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MSA AA	5	\$4,968	22	\$22,084	27	100.0	\$27,052	100.0	0	0

\* Prior Period Investments' means investments made in a previous evaluation 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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the evaluation date.

Liberty's qualified CD investment activity represents excellent responsiveness. During the evaluation period (including prior period investments), Liberty made a total of 27 investments totaling \$27.1 million. Qualified investments consist of mortgage-backed securities and donations to various non-profit organizations.

During the evaluation period, the bank purchased 12 mortgage-backed securities composed primarily of mortgages that support LMI individuals/families (including LMI multifamily housing) in the amount of \$22 million. In addition, Liberty made 10 donations totaling \$38,250 that support local affordable housing organizations. Some of the organizations include Habitat for Humanity Sarasota, Habitat for Humanity South Sarasota, and Habitat for Humanity Manatee County.

## Extent to Which the Bank Provides Community Development Services

Liberty demonstrates adequate responsiveness to CD needs in the MSA AA through CD services. CD services include maintenance of one branch in a moderate-income CT in 2020 and 2021. Beginning in 2022, demographic data reflects the income level of this CT is now middle-income; however, the location and operation of this branch did not change. The bank's other four branches were in middle-income CTs during the evaluation period.

Additional CD services include maintenance of delivery channels beyond traditional service delivery methods. Liberty offers mobile banking, online banking (including web-based loan applications), and ATMs located outside four of the bank's five branches. Notably, Liberty launched an online banking subsidiary "MPH" in 2021, allowing for online account opening in exchange for various rewards. Establishment of this platform increases access to financial services for individuals of all income backgrounds.

During the evaluation period, at least nine officers/employees participated in 18 qualified CD services, many of which included some form of leadership (i.e., service on financial committees, board-related positions, etc.), as well as regular meetings throughout the year. Four employees served on committees for Habitat for Humanity, a non-profit organization dedicated to providing affordable housing for LMI individuals. One of the four employees also served as a board member and board secretary for a chapter

of the organization. Another employee served as a mentor for candidates seeking to become homeowners through the organization's housing program. Four employees taught financial literacy classes to LMI audiences, including students, through programs such as Junior Achievement and Habitat 101. Four employees helped organize events and fundraisers hosted by Habitat for Humanity, a local chamber of commerce, and a local business. One employee performed a home evaluation on behalf of Habitat for Humanity. It was noted that some CD services were impacted by the COVID-19 pandemic in 2020 and 2021.



## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	January 1, 2020 – December 31, 2022	
<b>Bank Products Reviewed:</b>	Home mortgage CD loans, qualified investments, and CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Florida</b>		
MSA AA	Full-Scope	North Port-Sarasota-Bradenton MSA #35840 – Sarasota and Manatee Counties, Florida (entire counties).
Florida	Limited-Scope	Statewide

## Appendix B: Summary of State Ratings

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RATINGS: LIBERTY SAVINGS BANK, FSB			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Liberty Savings Bank, FSB	Satisfactory	Satisfactory	Satisfactory
State:			
Florida	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

**Metropolitan Statistical Area (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The 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

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### 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 the 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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/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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- 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 assessment area.
- 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/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.



## State of Florida

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
MSA AA	340	74,937	100.0	59,444	1.0	0.0	0.4	18.3	12.9	12.7	50.7	45.9	44.2	29.9	41.2	42.7	0.0	0.0	0.0
Total	340	74,937	100.0	59,444	1.0	0.0	0.4	18.3	12.9	12.7	50.7	45.9	44.2	29.9	41.2	42.7	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
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
MSA AA	18	4,291	100.0	37,397	1.2	0.0	0.5	18.1	11.1	14.9	46.7	50.0	41.9	33.8	38.9	42.0	0.2	0.0	0.7
Total	18	4,291	100.0	37,397	1.2	0.0	0.5	18.1	11.1	14.9	46.7	50.0	41.9	33.8	38.9	42.0	0.2	0.0	0.7
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
MSA AA	340	74,937	100.0	59,444	19.4	9.7	4.8	19.1	22.4	14.8	21.0	30.0	20.2	40.5	37.1	46.0	0.0	0.9	14.2
Total	340	74,937	100.0	59,444	19.4	9.7	4.8	19.1	22.4	14.8	21.0	30.0	20.2	40.5	37.1	46.0	0.0	0.9	14.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
MSA AA	18	4,291	100.0	37,397	18.8	11.1	5.7	19.6	50.0	15.1	20.4	11.1	20.8	41.2	27.8	45.0	0.0	0.0	13.3
Total	18	4,291	100.0	37,397	18.8	11.1	5.7	19.6	50.0	15.1	20.4	11.1	20.8	41.2	27.8	45.0	0.0	0.0	13.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

## SECTION 3

### Branch Office Addresses

# LIBERTY SAVINGS BANK FINANCIAL CENTER LOCATIONS

## Florida Locations

<p><b>Jacaranda</b> ATM access 4103 South Tamiami Trail Venice, FL 34293 Phone: 941-493-9174 Fax: 941-408-0014</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4              M-Th: 8-5 F: 8-6 S: 9-12                S: 9-12</p>	<p><b>Shamrock</b> ATM access 1697 South Tamiami Trail Venice, FL 34293 Phone: 941-408-0201 Fax: 941-493-4085</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4              M-Th: 8-5 F: 8-6 S: 9-12                S: 9-12</p>
<p><b>Square South</b> No ATM 8383 South Tamiami Trail, Suite 101 Sarasota, FL 34238 Phone: 941-927-3629 Fax: 941-927-2686</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4              M-Th: 8-5 F: 8-6</p>	<p><b>Stickney Point</b> ATM access 2323 Stickney Point Road Sarasota, FL 34231 Phone: 941-927-8293 Fax: 941-925-3563</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4              M-Th: 8-5 F: 8-6 S: 9-12                S: 9-12</p>
<p><b>Wildewood</b> ATM access 3901 Cortez Road West Bradenton, FL 34210 Phone: 941-755-5733 Fax: 941-755-5875</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4              M-Th: 8-5 F: 8-6 S: 9-12                S: 9-12</p>	

For information call the Liberty FreedomLine® at 800-436-6300, or visit us at [www.libertysavingsbank.com](http://www.libertysavingsbank.com).

**LIBERTY SAVINGS BANK  
HOME OFFICE LOCATION**

<b>Wilmington, Ohio</b> 2251 Rombach Avenue Wilmington, Ohio 45177 Phone: 937-382-1000 Fax: 937-383-2751	No ATM
<u>Office Hours</u> M-F: 8-5	

**This location is not a financial center and is not open to the public for account transactions. This information is provided solely to identify Liberty's Home Office.**

For information call the Liberty FreedomLine® at 800-436-6300, or visit us at [www.libertysavingsbank.com](http://www.libertysavingsbank.com).

## SECTION 4

### Branch Office Geographies

## **LIBERTY SAVINGS BANK**

### **Branch Office Geographies**

<b><u>Branch Office</u></b>	<b><u>MSA</u></b>	<b><u>County</u></b>	<b><u>Census Tract/BN</u></b>
<b><u>FLORIDA (12)</u></b>			
<b><u>Jacaranda</u></b>	North Port-Bradenton-Sarasota (35840)	Sarasota (115)	0025.10
<b><u>Shamrock</u></b>	North Port-Bradenton-Sarasota (35840)	Sarasota (115)	0025.05
<b><u>Square South</u></b>	North Port-Bradenton-Sarasota (35840)	Sarasota (115)	0020.08
<b><u>Stickney Point</u></b>	North Port-Bradenton-Sarasota (35840)	Sarasota (115)	0018.05
<b><u>Wildewood</u></b>	North Port-Bradenton-Sarasota (35840)	Manatee (81)	0011.05
<b><u>OHIO (39)</u></b>			
<b><u>Wilmington - Home Office</u></b>	Non-MSA	Clinton (27)	9645.02

## SECTION 5

Branches Opened or Closed



## **LIBERTY SAVINGS BANK**

### **Branches Opened or Closed - 2024**

<b><u>Branch Office Address</u></b>	<b><u>MSA County Census Tract/BNA</u></b>	<b><u>Date Opened</u></b>	<b><u>Date Closed</u></b>
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No branches have been opened or closed to date in 2024.

## **LIBERTY SAVINGS BANK**

### **Branches Opened or Closed - 2023**

<b><u>Branch Office Address</u></b>	<b><u>MSA County Census Tract/BNA</u></b>	<b><u>Date Opened</u></b>	<b><u>Date Closed</u></b>
-------------------------------------	---	---------------------------	---------------------------

No branches were opened or closed in 2023.

## **LIBERTY SAVINGS BANK**

### **Branches Opened or Closed - 2022**

<b><u>Branch Office Address</u></b>	<b><u>MSA County Census Tract/BNA</u></b>	<b><u>Date Opened</u></b>	<b><u>Date Closed</u></b>
-------------------------------------	---	---------------------------	---------------------------

No branches were opened or closed in 2022.

## SECTION 6

Locations and Hours of Operation  
Products and Services  
Fee Schedule

# LIBERTY SAVINGS BANK FINANCIAL CENTER LOCATIONS

## Florida Locations

<p><b>Jacaranda</b> ATM access 4103 South Tamiami Trail Venice, FL 34293 Phone: 941-493-9174 Fax: 941-408-0014</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4      M-Th: 8-5 S: 9-12      F: 8-6 S: 9-12</p>	<p><b>Shamrock</b> ATM access 1697 South Tamiami Trail Venice, FL 34293 Phone: 941-408-0201 Fax: 941-493-4085</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4      M-Th: 8-5 S: 9-12      F: 8-6 S: 9-12</p>
<p><b>Square South</b> No ATM 8383 South Tamiami Trail, Suite 101 Sarasota, FL 34238 Phone: 941-927-3629 Fax: 941-927-2686</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4      M-Th: 8-5 F: 8-6</p>	<p><b>Stickney Point</b> ATM access 2323 Stickney Point Road Sarasota, FL 34231 Phone: 941-927-8293 Fax: 941-925-3563</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4      M-Th: 8-5 S: 9-12      F: 8-6 S: 9-12</p>
<p><b>Wildewood</b> ATM access 3901 Cortez Road West Bradenton, FL 34210 Phone: 941-755-5733 Fax: 941-755-5875</p> <p><u>Lobby Hours</u>      <u>Drive Up Hours</u> M-F: 9-4      M-Th: 8-5 S: 9-12      F: 8-6 S: 9-12</p>	

For information call the Liberty FreedomLine® at 800-436-6300, or visit us at [www.libertysavingsbank.com](http://www.libertysavingsbank.com).

**LIBERTY SAVINGS BANK  
HOME OFFICE LOCATION**

<b>Wilmington, Ohio</b> 2251 Rombach Avenue Wilmington, Ohio 45177 Phone: 937-382-1000 Fax: 937-383-2751	No ATM
<u>Office Hours</u> M-F: 8-5	

**This location is not a financial center and is not open to the public for account transactions. This information is provided solely to identify Liberty's Home Office.**

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## **LIBERTY SAVINGS BANK, F.S.B.**

### **Products and Services**

#### **Personal Products and Services**

Big Interest Bundle:

- Big Interest Checking
- Big Interest Gold Checking
- Big Interest Savings

Personal Checking Accounts:

- Free Checking
- Free Checking with Interest
- Freedom Gold Checking
- 50 Freedom Checking
- Premier Checking
- Clean Slate Checking

Money Market Demand Accounts

Convenience Savings Account

Reward Savings Account

Holiday Club Savings Account

Certificates of Deposit

Insured Cash Sweep (ICS)/CDARS

Traditional IRAs, Roth IRAs & SEP IRAs

ATM Access Card/VISA Debit Cards

Card Valet

VISA Credit Cards

Freedom Overdraft Protection

Savings Overdraft Solution

FreedomLine® 24-Hour Access

Direct Deposit

SurePay

Wire Transfer

Safe Deposit Boxes

Cash Advance

Notary Service

Refer a Friend Program

AllPoint ATM Network

#### **Online Banking**

You can open and access your checking account or savings account any time of the day or night at [www.libertysavingsbank.com](http://www.libertysavingsbank.com). Best of all we've taken the worry out of online banking with our privacy and security features. Our online products and services include:

Visa Debit Cards

Visa Credit Cards

Account Opening

eStatements

Online Bill Pay

Internal and External Account to Account Transfers

Mobile Banking and Mobile Deposit

Tablet Banking

Order Checks

Travel Alerts

Zelle

Apple Pay

Google Pay

Samsung Pay

Card Valet

Opt-In

Refer a Friend Program

Debit Card Replacement

Change of Address

Change Direct Deposit

Personal Financial Management Across Financial Institutions

Credit Score and Credit Monitoring

Close Account Request



## **LIBERTY SAVINGS BANK, F.S.B.**

### **Products and Services**

#### **Commercial Products and Services**

Commercial Checking Accounts:

- Non-Profit Checking
- Business Value Checking
- Business Advantage Checking
- Business Checking with Interest
- Commercial Checking Account
- IOTA, IOLTA Accounts

Money Market Demand Account

Certificates of Deposit

Business Savings Account

Small Business Overdraft Account

Remote Deposit

Mobile Deposit

Business Online Banking & Bill Pay

Corporate Credit Cards

Visa Debit Card

ACH

#### **Plus Special Services for Retail Businesses:**

Merchant Bank Card Program

Night Depository (most locations)

Currency & Coin Services (selected locations)

#### **Loan Products**

Mortgage Loans:

- Fixed Rate
- Adjustable Rate (ARM)

First Lien HELOC (Home Equity Line of Credit)

Second Lien HELOC (Home Equity Line of Credit)

Foreign National Loans

Non-Qualified Mortgage (Non-QM Loans)

Personal Unsecured Loans

Classic Auto Loans

#### **Simplify your life**

Take advantage of doing all of your banking with Liberty Savings Bank. You can handle your complete business and personal banking transactions at any Liberty financial center. Whether you're making a deposit into your personal savings account or transferring funds to your business checking account, you know you'll get the same level of personal service and professionalism.

Discover how easy and efficient banking can be when you work with a single partner for all your financial needs. Stop by any of our financial centers and speak to a Liberty representative, call the Liberty FreedomLine® at 1-800-436-6300, or visit us at [www.libertysavingsbank.com](http://www.libertysavingsbank.com).





## **MPH.BANK**

### **Products and Services**

#### **Personal Products and Services**

Spend (Debit Card) Accounts:

- Friends Spend Account
- Free Spend Account
- First Spend Account
- Fresh Spend Account

Future Savings Account

Goals (Savings) Account

VISA Debit Cards

Card Valet

Direct Deposit

Referral Rewards Program

AllPoint ATM Network

#### **Online Banking**

You can open and access your checking account or savings account any time of the day or night at <https://mph.bank>. Best of all we've taken the worry out of online banking with our privacy and security features. Our online products and services include:

Visa Debit Cards

Account Opening

eStatements

Online Bill Pay

Internal and External Account to Account Transfers

Mobile Banking and Mobile Deposit

Travel Alerts

Zelle

Apple Pay

Google Pay

Samsung Pay

Card Valet

Referral Rewards Program Management

Round-Up

Debit Card Replacement

Change of Address

Change Direct Deposit

Personal Financial Management Across Financial Institutions

Credit Score and Credit Monitoring

#### **Simplify your life**

Take advantage of being able to manage all of your banking with mph.bank. You can see all of your personal finances from one place using our PFM product and monitor your personal financial health using our built-in Credit Reporting Service.

Discover how easy and efficient banking can be when you work with a single app for all your financial needs. Visit us at <https://mph.bank> or call our Customer Service Reps at 1-800-892-8798.



## **LIBERTY SAVINGS BANK FEE SCHEDULE**

**Liberty Savings Bank** is dedicated to being the very best local full-service option for your financial needs. We demonstrate that ***our interest is in you*** through excellent customer service and the best product and service options. Our mission is to provide the best value available to every customer.

### **LIBERTY SAVINGS BANK - RETAIL BANKING PRODUCTS**

#### **Commercial Checking Products**

- ✓ Checking for Non-Profit Organizations (*Eligible Non-Profit Organizations/Associations*) – No monthly maintenance fee; basic Business Online Banking and Online Bill Pay are free.
- ✓ Business Value Checking – Maintenance fee of \$5.00 per month; first 25 items are free, then \$.25 per item over 25 in the statement cycle; basic Business Online Banking and Online Bill Pay are free.
- ✓ Business Advantage Checking – Maintenance fee of \$10.00 per month (waived with \$2,500 minimum daily balance); first 250 items are free, then \$.25 per item over 250 in the statement cycle; basic Business Online Banking and Online Bill Pay are free.
- ✓ Business Checking with Interest – Monthly maintenance fees are offset with earnings credit. Any excess earnings credit is posted as interest. Maintenance fee of \$15.00 per month, plus \$.60 per deposit ticket, \$.12 per deposit item, and \$.17 per withdrawal/debit; basic Business Online Banking and Online Bill Pay are free.
- ✓ Commercial Checking – Maintenance fee of \$15.00 per month plus \$.60 per deposit ticket, \$.12 per deposit item, and \$.17 per withdrawal/debit; basic Business Online Banking and Online Bill Pay are free.
- ✓ IOTA, IOLTA – These attorney and realtor trust accounts earn a competitive interest rate with no monthly fees.

## **LIBERTY SAVINGS BANK - RETAIL BANKING PRODUCTS - continued**

### **Other Commercial Products/Services**

- ✓ ACH Origination Fee Per Item      \$0.10
- ✓ Business Online Banking:              Level 1 – Free  
    Level 2 - \$24.95 per month  
    Level 3 - \$49.95 per month
- ✓ Remote Deposit (*offered to commercial customers*):
  - Single Feed Processing                      \$30.00 per month
  - Multi-Feed Processing                      \$50.00 per month
  - Additional Single Feed Scanner/Location      \$20.00 per month
  - Additional Multi-Feed Scanner/Location      \$30.00 per month
  - Fee Per Remote Deposit Item                  \$ 0.12

### **Personal Checking Products**

- ✓ Free Checking – No minimum balance, no monthly service fee
- ✓ Free Checking with Interest – No minimum balance, no monthly service fee; does require eStatements
- ✓ Big Interest Bundle/Big Interest Checking – No minimum balance, no monthly service fee
- ✓ Big Interest Bundle/Big Interest Gold Checking - \$4.00 per month
- ✓ Premier Checking - \$25.00 per month if the combined balance in any Liberty deposit products falls below \$35,000
- ✓ Freedom Gold Checking - \$4.00 per month
- ✓ 50 Freedom Checking - \$4.00 per month if balance falls below \$100
- ✓ Clean Slate Checking - \$10.00 per month

### **Money Market Account (MMDA) – Personal and Business**

**Minimum balance to avoid imposition of fees** – A service charge of \$10.00 will be imposed each statement cycle if the balance in the account falls below \$2,500.00 any day of the cycle.

## **LIBERTY SAVINGS BANK - RETAIL BANKING PRODUCTS - continued**

### **Savings Accounts**

- ✓ Rewards Savings – No minimum balance or monthly fees
- ✓ Big Interest Bundle/Big Interest Savings – No minimum balance or monthly fees
- ✓ Convenience Savings - A minimum balance fee of \$5.00 will be imposed each statement cycle if the daily balance falls below \$300.00 any day of the monthly statement cycle. This fee will be waived for accounts held by minors.
- ✓ Holiday Club – No minimum balance or monthly fees

### **Certificate of Deposit (CD) Accounts**

A withdrawal of principal from a CD account with a term of 12 months or less will incur a forfeiture of interest, whether earned or not, of 90 days plus a \$50.00 fee.

A withdrawal of principal from a CD account with a term greater than 12 months will incur a forfeiture of interest, whether earned or not, of 180 days plus a \$50.00 fee.

### **VISA® Check Card/VISA® Business Check Card and ATM Usage Information**

Liberty Savings Bank ATM Transactions

Customers

Free

Non-Customers

\$5.00 per withdrawal  
(may vary per location)

Non-Liberty Savings Bank ATMs

\$3.00 per withdrawal

\$5.00 per international withdrawal

No transaction fee at point-of-sale terminals

(All applicable fees will be deducted at the time of the transaction)

Liberty customers have access to 55,000+ surcharge-free ATMs through the Allpoint Network.

VISA® Check Card

No POS fees

Debit/ATM Card Replacement

\$10.00 per card

## **LIBERTY SAVINGS BANK - RETAIL BANKING PRODUCTS - continued**

### **Additional Bank Fees**

Account Activity Printout/Duplicate Statement	\$5.00 per statement
Account Research/Statement Balancing (Half hour minimum)	\$20.00 per half hour
Cash/Coin	\$0.25 per strap/roll
Cashiers Checks for Customers	\$10.00 each
Commercial Night Drop Bags	\$25.00 each
Counter Checks	\$2.00 each
Deposit Bags	\$3.00 each
Dormant Account Fee for Checking/MMDA Accounts (Account balance less than \$10,000 and inactivity for 6 months)	\$15.00 per month
Dormant Account Fee for Savings Accounts (Account balance less than \$10,000 and inactivity for 12 months)	\$15.00 per month
Early Account Closure Fee (Account closed within 180 days of opening)	\$50.00
Escheat Fee	\$50.00
Legal Fees/Garnishment	\$150.00 per item
Non-Sufficient Funds/Overdraft Fee	\$37.00 per item
Online Bill Pay (Personal Accounts)	No charge
On-Us Check Cashing for Non-Customers	\$15.00
Replacement Debit/ATM Card	\$10.00 each
Returned Mail Processing (monthly statement only)	\$10.00 per month
Rushed Debit Card	\$60.00
Savings Overdraft Solution (SOS) Transfer	\$10.00 per transfer

**LIBERTY SAVINGS BANK - RETAIL BANKING PRODUCTS - continued**

**Additional Bank Fees (continued)**

Special Handling Fee	\$25.00
Stop Payment	\$37.00 per item
Verification of Deposit/Credit	\$15.00
Wires – Incoming Domestic	\$15.00 per wire
Wires – Incoming Foreign	\$15.00 per wire plus correspondent bank fees
Wires – Outgoing Domestic	\$30.00 per wire
Wires – Outgoing Foreign	\$45.00 per wire plus correspondent bank fees

## **MPH.BANK FEES**

MPH.BANK provides a variety of accounts to meet the needs of most on-line banking customers. The fees and account requirements also vary according to the purpose of the account.

### **Spend Accounts**

- Friends Spend Account – No minimum balance; \$9.00 fee per month waived with at least 15 posted and cleared debit card transactions per month.
- Free Spend Account – No minimum balance; no monthly service fee; direct deposit of at least \$500 per month required to maintain the account.
- First Spend Account – No minimum balance, no fees. This account is limited to customers ages 10-17 with parent or guardian as a joint account holder, or customers ages 18-24 attending higher level education.
- Fresh Spend Account – No minimum balance, \$9.00 fee per month. This account is designed to assist customers with previous CheckSystems problems to open a bank account.

### **Savings Accounts**

- Future Savings Account – No fees; no special requirements.
- Goals Savings Account – No fees; offered only in conjunction with one of the Spend accounts.

### **mphCard/VISA® Check Card and ATM Usage Information**

Allpoint Network	Free
------------------	------

Non-Liberty Savings Bank ATMs	Fee free from Liberty; ATM owners may assess a fee
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### **Additional Bank Fees**

No usual bank fees!

## **LIBERTY SAVINGS BANK – SAFE DEPOSIT BOX RATES**

### **Florida Region**

<b><i>Box Size</i></b>	<b><i>Annual Rental Fee</i></b>
3 x 5	\$ 45.00
3 x 10	\$ 70.00
5 x 10	\$ 85.00
10 x 10	\$140.00

- Safe deposit box rentals are subject to availability.
- Lost key fee is \$25.00.
- Safe deposit box rent is paid for one year in advance.
- Safe deposit box rental cannot be pro-rated.
- Drilling fees may vary. Drilling fees are based on materials and labor.



## **LIBERTY SAVINGS BANK – SAFE DEPOSIT BOX RATES**

### **Ohio Region**

There are no safe deposit boxes available in the Ohio region.

## **LIBERTY SAVINGS BANK – COMMERCIAL LENDING**

Although fees for commercial loans are often negotiated with the Borrower, the Commercial Lending department generally requires the following standard fees. Interest rate and risk of the loan may affect the charges assessed.

### **Commercial Lines of Credit**

- 1.0% Origination Fee (at each annual renewal a renewal fee of one-half the origination fee is generally assessed)
- \$300 - \$500 Document Preparation Fee
- Borrower is responsible for all out-of-pocket charges for appraisals, environmental work, title work and legal fees.

### **Commercial Term Loans**

- 1.0% Origination Fee
- \$300 - \$500 Document Preparation Fee
- Borrower is responsible for all out-of-pocket charges for appraisals, environmental work, title work and legal fees.

### **Commercial Modifications**

- \$150 - \$300 Modification Fee

## **LIBERTY SAVINGS BANK - MORTGAGE LENDING**

### **Mortgage Lending Fees**

Origination Fee	\$1,195.00
Appraisal	Actual cost (varies)
Credit Report	Actual cost (varies)
Title Charges	Actual cost (varies)
Recording Fees	Actual cost (varies)
Tax Service Fee	\$80.00
Flood Certification Fee	\$12.25
Survey	Actual cost (varies)

**LIBERTY SAVINGS BANK – MORTGAGE SERVICING FEES**  
**(Cenlar as Subservicer)**

<b>Appraisals</b>	Range depending on property and location	\$350.00 - \$1,200.00
<b>Assumptions</b>	As permitted by state law (may vary by loan type)	Up to \$1,000.00
<b>Attorney Fees and Costs</b>	As permitted by law, typically	\$900.00 - \$2,900.00 Plus costs
<b>Brokers Price Opinion (BPO)</b>	Typically	\$135.00 - \$500.00
<b>Credit Reports</b>	Extra charges may apply for additional borrowers	\$9.90 - \$25.00
<b>Late Fee</b>	Normally a percentage of the monthly installment, depending on the type of loan and the provisions in the loan documents.	
<b>Modification Fee</b>	As permitted by state law	Up to \$3,000.00
<b>Partial Release Fee</b>		No cost
<b>Payment made by other than regular mail</b>		No cost
<b>Payoff Rescinded Fee</b>		\$200.00
<b>Payoff Statement Preparation Fee</b>		No cost
<b>Property Inspection Fee</b>		Up to \$25.00
<b>Property Preservation Fee</b>	May vary by loan type, city/state, property size, grass height, etc.	Typically \$10 - \$25,000 Bond
<b>Recasts</b>		\$250.00
<b>Recording Fee</b>	Varies -actual costs are passed on	Varies
<b>Returned Check Fee</b>	As permitted by state law (may vary by loan type)	Up to \$25.00
<b>Subordination Fee</b>	Plus applicable legal fees	\$200.00
<b>Title Reports</b>	Varies – actual costs are passed on	Varies

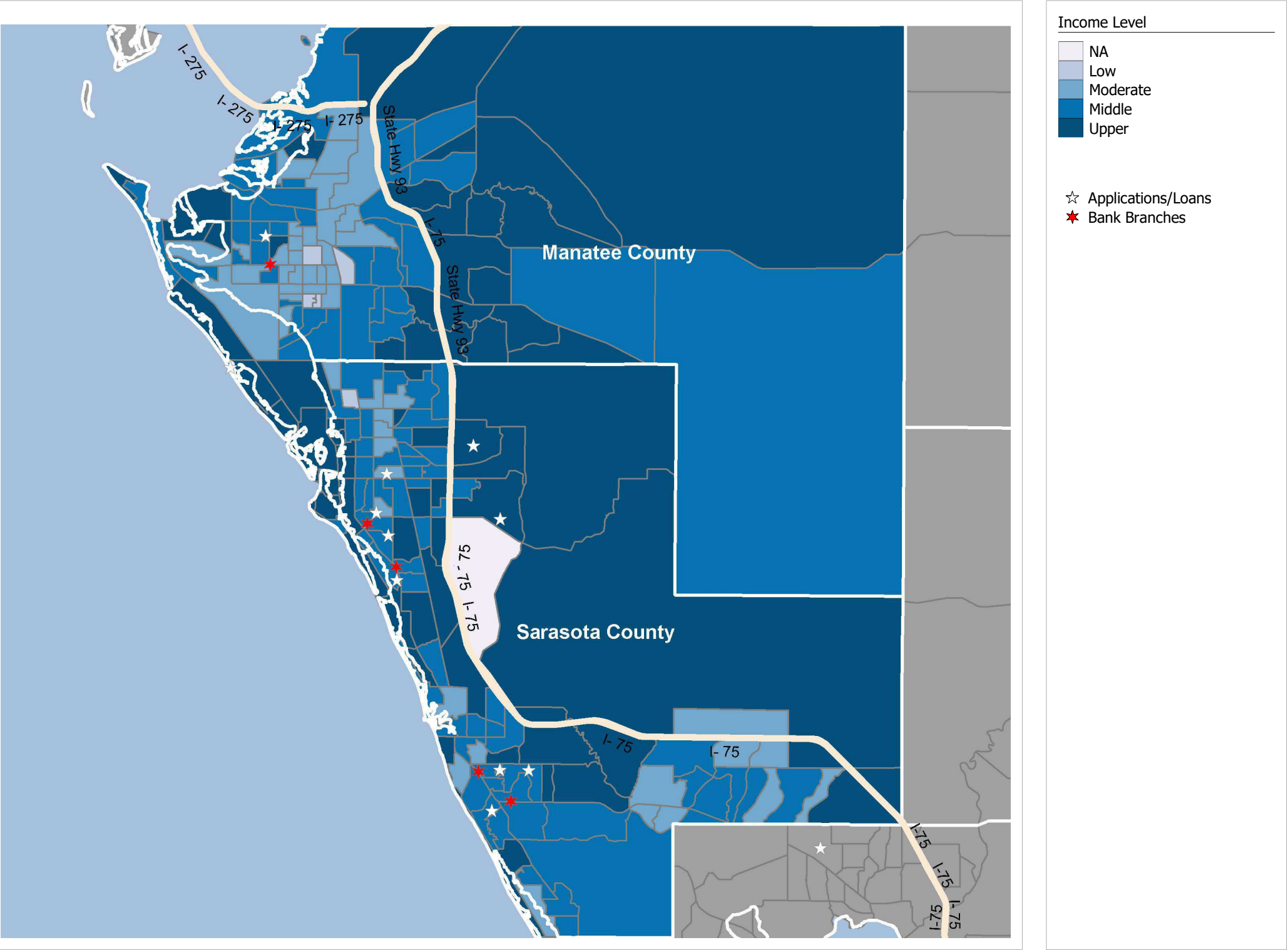
**LIBERTY SAVINGS BANK – CLASSIC AUTO LOAN SERVICING FEES**

<b>Late Fee</b>	Normally a percentage of the monthly installment, depending on the type of loan and the provisions in the loan documents	
<b>Payment made by other than regular mail</b>		No cost
<b>Payoff Statement Preparation Fee</b>		No cost

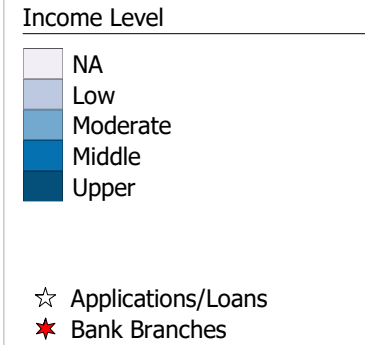
## SECTION 7

### Assessment Area Maps and Census Tracts

LIBERTY SAVINGS BANK, FSB - 2023 CRA - ASSESSMENT AREA INCOME MAP  
FLORIDA\*

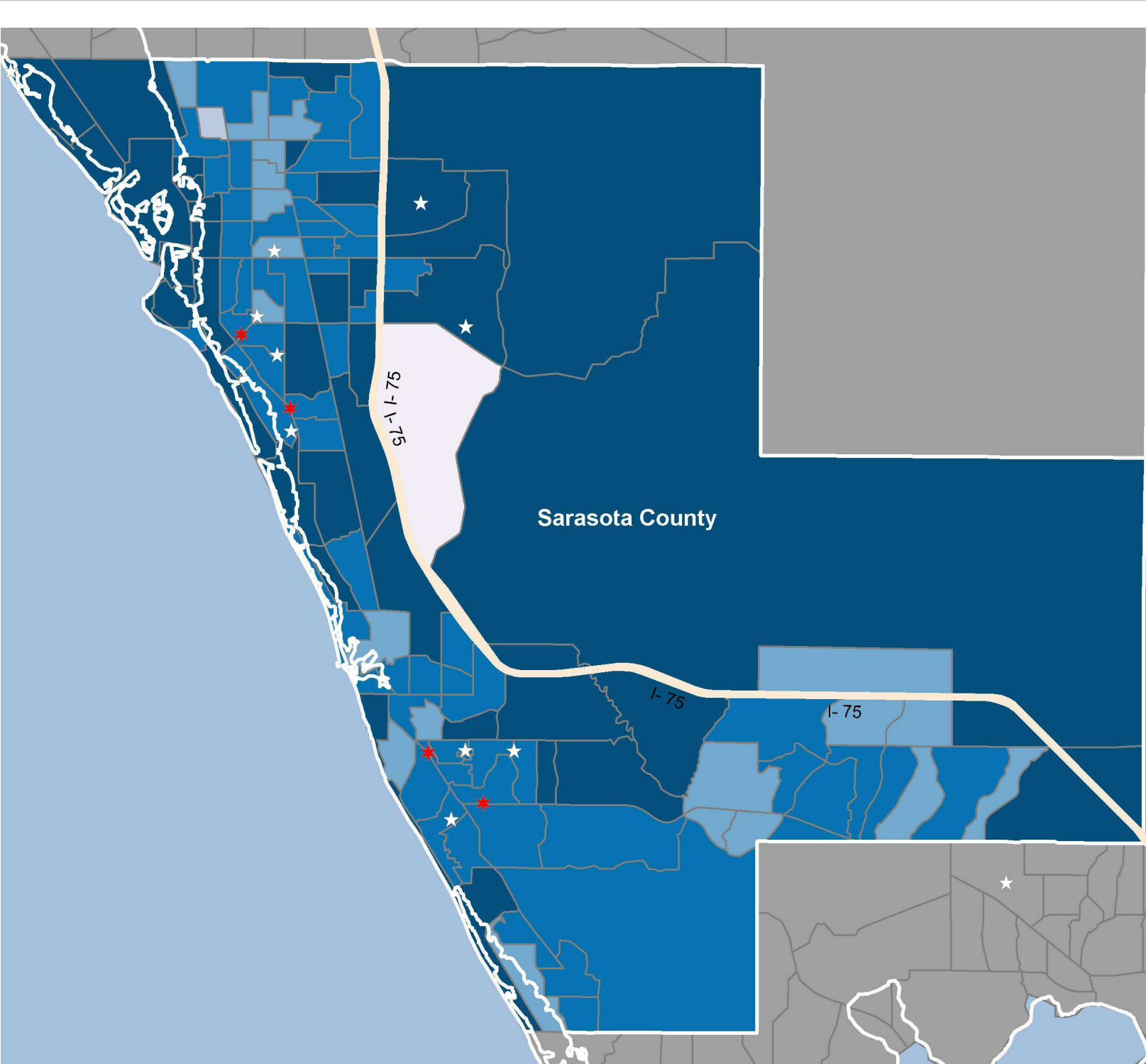


## LSB NORTHPORT SARASOTA MSA\*

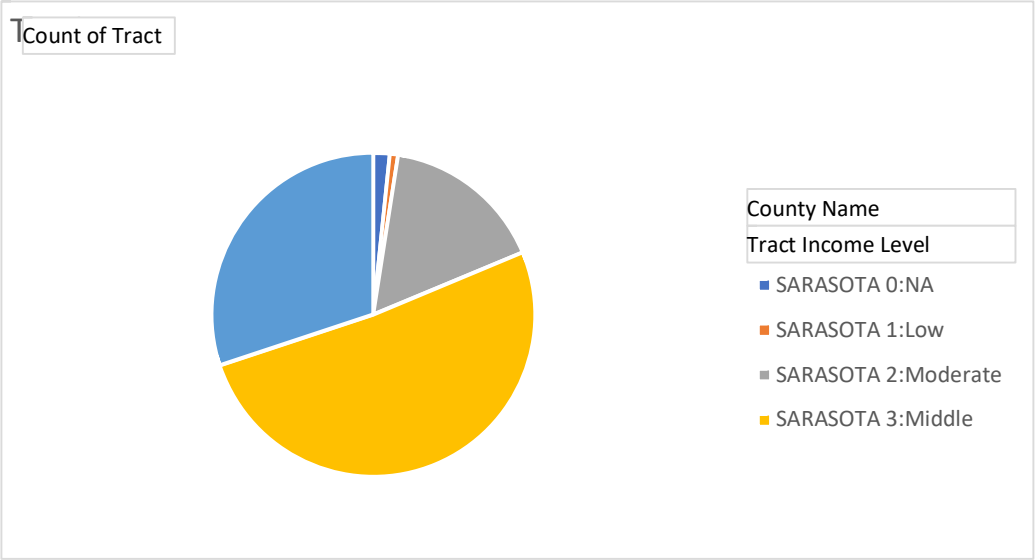




LIBERTY SAVINGS BANK, FSB - 2023 CRA - ASSESSMENT AREA INCOME MAP  
FLORIDA\*



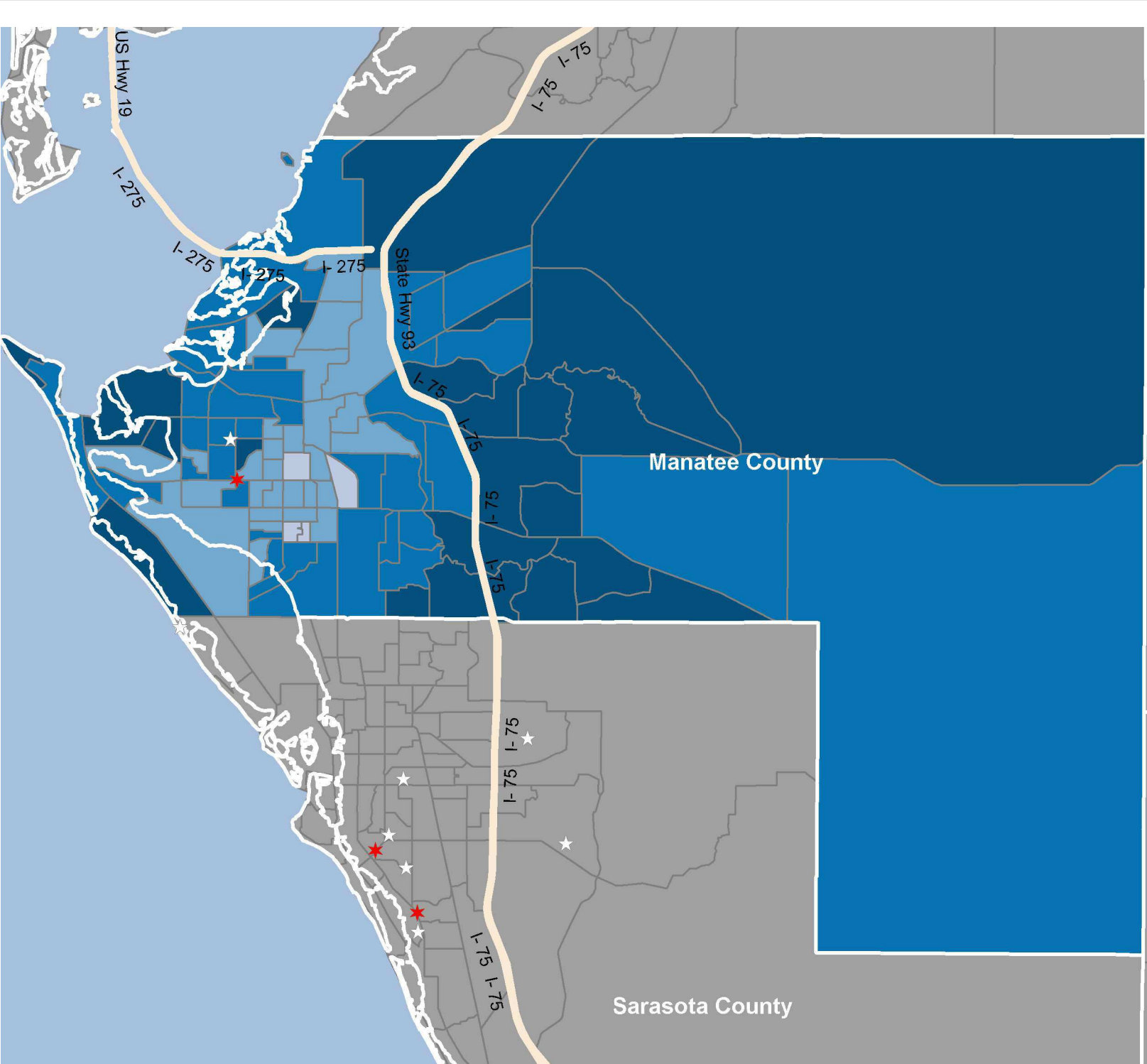
Row Labels	Count of Tract
<b>SARASOTA</b>	<b>123</b>
0:NA	2
1:Low	1
2:Moderate	20
3:Middle	63
4:Upper	37
<b>Grand Total</b>	<b>123</b>



State ID	State	County ID	County Name	MSA/MD	MSA/MD Name	Tract	Tract Income Level	Minority Level	Minority Pct.	Black Minority Pct.	Hispanic	Minority Pct.	Distrsd / Undersvd	Hispanic Black Minority Pct.	Hispanic Black Minority Level	Asian Minority Pct.	Asian Minority Level
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	9900.00	0:NA	0	0	0			No	0	0	0	0
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.48	4:Upper	2	19.23	3.16	10.57		No	13.43	2	2.02	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.47	2:Moderate	3	26.6	7.94	12.36		No	20.21	3	1.59	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.46	4:Upper	3	27.05	7.59	12.64		No	19.87	2	1.33	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.45	2:Moderate	3	24.8	5.75	12.49		No	18.1	2	1.51	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.44	2:Moderate	2	17.71	3.23	8.64		No	11.81	2	1.07	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.43	3:Middle	3	25.07	5.41	12.54		No	17.57	2	2.25	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.42	3:Middle	3	22.42	5.68	10.27		No	15.63	2	2.68	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.41	2:Moderate	3	29.51	8.2	15.1		No	22.77	3	1.45	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.40	2:Moderate	3	23.91	5.72	12.23		No	17.72	2	1.35	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.39	3:Middle	3	22.16	6.19	9.51		No	15.59	2	1.89	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.38	3:Middle	3	24.25	7.73	10.83		No	18.25	2	1.29	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.37	3:Middle	2	16.73	3.64	7.38		No	10.73	2	2	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.36	3:Middle	3	22.35	4.75	10.33		No	14.99	2	1.67	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.35	4:Upper	1	3.35	0.13	1.74		No	1.88	1	0.4	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.34	4:Upper	1	9.83	0.75	3.98		No	4.69	1	1.85	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.33	3:Middle	1	4.99	0.13	2.27		No	2.38	1	0.82	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.32	3:Middle	1	6.55	0.32	2.82		No	3.12	1	1.35	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.31	3:Middle	1	5.59	0.5	2.26		No	2.68	1	1.37	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.30	3:Middle	1	5.51	0.2	2.28		No	2.48	1	0.96	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.29	2:Moderate	1	4.78	0.29	1.65		No	1.89	1	0.18	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.28	4:Upper	1	3.77	0.41	1.82		No	2.16	1	0.25	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.27	0:NA	2	15.08	0.62	6.06		No	6.61	1	3.65	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.26	4:Upper	1	8.82	0.91	3.54		No	4.45	1	1.97	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.25	4:Upper	2	13.34	1.2	6.71		No	7.85	1	1.81	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.24	2:Moderate	1	2.27	0	0.45		No	0.45	1	0.25	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.23	2:Moderate	2	12.34	1.87	6.63		No	8.29	1	1.02	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.21	2:Moderate	3	24.3	5.86	12.99		No	18.6	2	1.08	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.20	3:Middle	1	6.46	0.46	2.91		No	3.25	1	1.24	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.16	4:Upper	2	10.33	1.02	4.65		No	5.61	1	1.58	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.14	4:Upper	1	9.51	0.4	3.44		No	3.8	1	1.66	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0027.10	3:Middle	3	20.32	5.9	8.71		No	14.47	2	1.04	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0026.05	3:Middle	2	10.67	0.39	6.42		No	6.77	1	0.78	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0026.04	3:Middle	1	7.9	0.48	3.95		No	4.43	1	0.72	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0026.03	2:Moderate	1	7.45	0.29	3.89		No	4.18	1	0.63	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0026.02	3:Middle	1	6.12	0.42	1.89		No	2.3	1	0.87	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0026.01	4:Upper	1	8.8	0.45	3.66		No	4.12	1	1.25	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0025.11	3:Middle	1	9.66	0.69	4.25		No	4.95	1	1.53	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0025.10	3:Middle	1	9.24	0.82	4.49		No	5.26	1	0.96	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0025.09	3:Middle	2	10.49	0.92	5.45		No	6.31	1	0.92	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0025.08	3:Middle	2	12.27	1.15	5.44		No	6.46	1	1.49	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0025.07	3:Middle	2	10.98	0.82	6.22		No	6.92	1	1.26	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0025.05	3:Middle	2	18.25	0.63	10.07		No	10.7	2	1.89	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0025.04	3:Middle	2	15.61	0.81	7.56		No	8.37	1	2.73	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0024.04	3:Middle	2	10.66	0.56	5.14		No	5.65	1	1.41	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0024.03	2:Moderate	1	5.87	0.35	3.04		No	3.33	1	0.99	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0024.01	4:Upper	1	8.61	0.48	4.43		No	4.91	1	0.55	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0023.07	3:Middle	1	4.45	0.16	2.26		No	2.42	1	0.48	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0023.06	3:Middle	1	7.04	1.16	3.72		No	4.81	1	0.29	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0023.05	3:Middle	1	6.45	0.37	2.96		No	3.28	1	0.48	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0023.04	3:Middle	1	6.75	1.32	2.47		No	3.78	1	0.86	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0023.02	3:Middle	1	8.48	0.75	4.52		No	5.22	1	0.66	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0022.05	3:Middle	1	8.08	1.03	3.41		No	4.27	1	1.12	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0022.04	4:Upper	2	10.25	0.81	3.52		No	4.34	1	2.3	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0022.03	2:Moderate	2	14.48	3.57	5.36		No	8.93	1	1.45	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0022.01	3:Middle	1	8.36	0.5	3.44		No	3.94	1	1.73	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0021.02	4:Upper	1	9.27	0.56	4.02		No	4.58	1	1.79	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0021.01	4:Upper	2	14.08	0.49	5.24		No	5.67	1	4.4	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.16	4:Upper	2	10.02	0.95	4.66		No	5.52	1	1.8	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.15	3:Middle	2	17.62	1.05	8.61		No	9.65	1	3.6	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.14	4:Upper	2	11.98	1.22	4.59		No	5.81	1	3.28	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.13	4:Upper	2	16.58	1.17	5.21		No	6.33	1	5.89	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.12	3:Middle	2	12.73	1.45	6.63		No	7.94	1	1.25	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.11	3:Middle	1	6.99	0	4.31		No	4.31	1	0.29	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.08	3:Middle	3	23.64	3.08	13.91		No	16.88	2	3.04	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.07	3:Middle	1	9.02	1	3.9		No	4.79	1	1.41	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.04	3:Middle	2	13	1.25	6.92		No	8.18	1	1.69	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.03	3:Middle	3	20.62	1.41	12.61		No	13.93	2	1.66	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.09	4:Upper	1	5.7	0.34	2.26		No	2.61	1	1.43	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.05	3:Middle	1	4.66	0	1.97		No	1.97	1	1.04	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.04	4:Upper	1	9.57	0.25	3.55		No	3.8	1	2.07	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.03	4:Upper	1	7.33	0.48	2.41		No	2.77	1	1.14	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0018.05	3:Middle	2	13.41	1.28	6.74		No	7.91	1	1.07	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0018.04	3:Middle	3	20.41	1.85	12.73		No	14.35	2	1.43	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0018.03	3:Middle	2	18.32	1.77	11.31		No	13.02	2	1.29	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0018.01	4:Upper	2	11.14	0.75	5.16		No	5.88	1	1.71	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0017.04	3:Middle	3	29.21	2.22	19.74		No	21.66	3	1.68	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0017.03	2:Moderate	3	21.44	2.11	14.14		No	16.2	2	1.3	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0017.02	3:Middle	2	19.23	1.56	11.27		No	12.8	2	1.87	1

State ID	State	County ID	County Name	MSA/MD	MSA/MD Name	Tract	Tract Income Level	Minority Level	Minority Pct.	Black Minority Pct.	Hispanic	Minority Pct.	Distrsd / Undersvd	Hispanic Black Minority Pct.	Hispanic Black Minority Level	Asian Minority Pct.	Asian Minority Level
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0016.02	2:Moderate	3	26.69	1.99	19.18	No	No	21.1	3	1.18	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0016.01	3:Middle	2	17.73	1.7	10.32	No	No	11.8	2	2.07	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.11	3:Middle	3	20.78	1.62	8.85	No	No	10.47	2	4.92	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.10	4:Upper	2	17.25	1.4	8.69	No	No	10.02	2	3.28	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.09	4:Upper	2	18.82	1.12	8.94	No	No	10.01	2	4.42	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.08	3:Middle	2	16.32	1.9	9.99	No	No	11.78	2	1.4	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.05	3:Middle	3	29.75	1.68	21.28	No	No	22.91	3	1.79	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.04	3:Middle	3	28.96	1.79	20.49	No	No	22.12	3	1.27	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.03	3:Middle	3	25.23	1.42	17.44	No	No	18.68	2	1.24	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.05	4:Upper	2	17.25	1.8	7.66	No	No	9.43	1	4.25	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.04	4:Upper	2	15.55	1.54	6.2	No	No	7.72	1	3.4	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.03	4:Upper	2	12.3	1.12	5.7	No	No	6.78	1	2.74	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.02	3:Middle	3	21.33	2.68	12.52	No	No	15.11	2	1.62	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0013.04	3:Middle	2	16.8	1.32	11.22	No	No	12.12	2	1.11	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0013.03	3:Middle	2	19.42	1.88	9.96	No	No	11.68	2	3.01	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0013.02	4:Upper	3	21.05	2.46	12.04	No	No	14.29	2	2.39	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0013.01	3:Middle	3	25.28	4.13	14.89	No	No	18.7	2	3.49	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.06	3:Middle	3	33.7	6.2	21.07	No	No	26.87	3	1.64	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.05	4:Upper	3	25.73	4.71	13.18	No	No	17.89	2	2.33	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.04	3:Middle	3	25.19	3.41	13.99	No	No	17.05	2	2.27	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.03	3:Middle	1	9.22	2.02	4.25	No	No	6.15	1	1.07	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.02	2:Moderate	3	49.6	5.41	38.43	No	No	43.54	3	1.69	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0011.02	2:Moderate	4	57.81	21.94	30.23	No	No	51.94	4	1.16	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0011.01	3:Middle	3	43.31	18.3	20.17	No	No	38.06	3	0.75	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0010.00	2:Moderate	3	45.75	14.16	16.8	No	No	30.54	3	10.81	2
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0009.00	4:Upper	2	18.76	3.76	8.15	No	No	11.57	2	3.22	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.02	4:Upper	1	5.87	0.51	2.2	No	No	2.71	1	0.94	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.01	4:Upper	1	5.38	0.4	1.86	No	No	2.26	1	1.56	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0007.00	4:Upper	1	5.15	0.13	2.09	No	No	2.22	1	1.6	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0006.02	3:Middle	2	16.69	1.39	9.22	No	No	10.49	2	2.07	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0006.01	4:Upper	2	14	0.91	6.26	No	No	7.09	1	2.52	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0005.03	2:Moderate	3	25.44	2.45	18.66	No	No	21.06	3	0.77	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0005.02	3:Middle	3	29.21	3.55	19.3	No	No	22.62	3	2.31	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0005.01	4:Upper	2	10.19	0.89	3.4	No	No	4.17	1	2.33	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.07	2:Moderate	3	49.39	6.84	35.11	No	No	41.76	3	2.75	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.06	2:Moderate	3	48.74	7.39	36.42	No	No	43.48	3	1.7	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.05	3:Middle	3	31.64	2.89	23.9	No	No	26.69	3	0.75	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.04	4:Upper	2	15.66	2.46	7.23	No	No	9.54	1	2.15	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.01	3:Middle	3	39.11	6.84	25.47	No	No	31.93	3	1.91	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.00	1:Low	5	91.79	75.64	11.89	No	No	86.35	5	0.28	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0002.00	3:Middle	4	61.99	27.44	22.71	No	No	49.71	3	8.71	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0001.04	4:Upper	1	8.71	0.93	3.89	No	No	4.82	1	1.75	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0001.03	4:Upper	2	15.72	3.45	7.09	No	No	10.41	2	2.13	1
12	FL	115	SARASOTA	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0001.02	3:Middle	3	38.82	10.41	25.01	No	No	34.77	3	1.09	1

LIBERTY SAVINGS BANK, FSB - 2023 CRA - ASSESSMENT AREA INCOME MAP  
FLORIDA\*

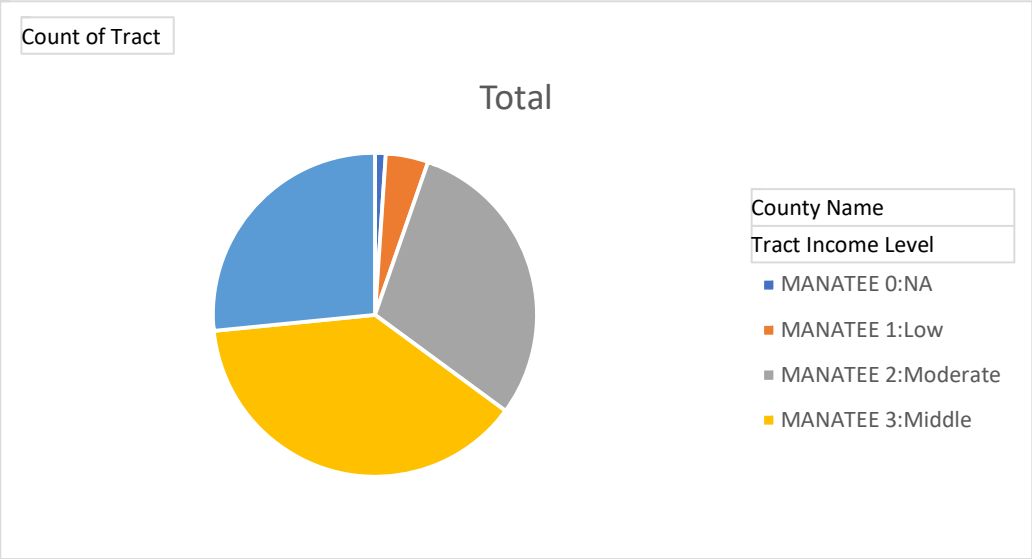


Income Level

- NA
- Low
- Moderate
- Middle
- Upper

☆ Applications/Loans  
★ Bank Branches

Row Labels	Count of Tract
<b>MANATEE</b>	<b>94</b>
0:NA	1
1:Low	4
2:Moderate	28
3:Middle	36
4:Upper	25
<b>Grand Total</b>	<b>94</b>

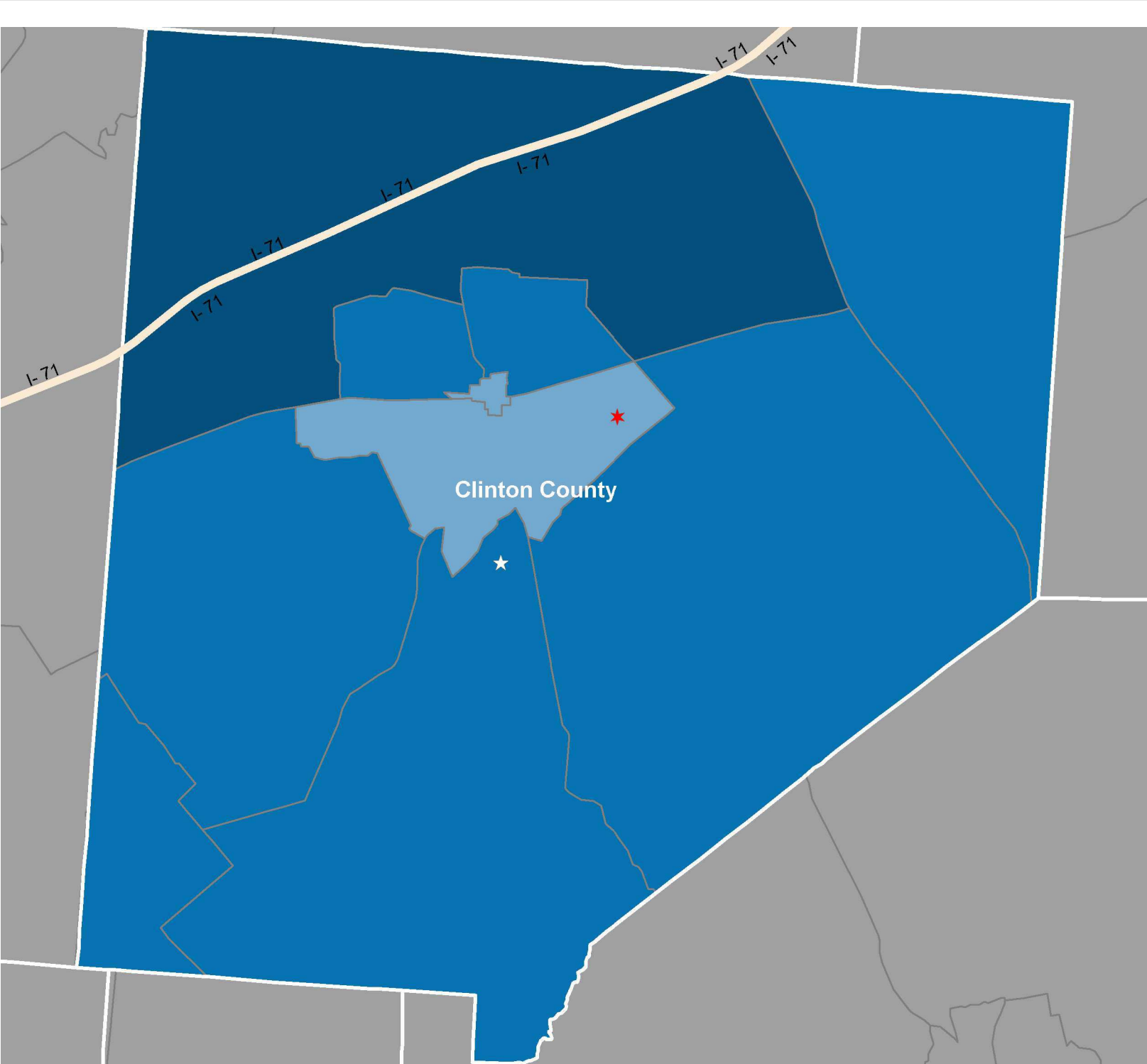


State ID	State	County ID	County Name	MSA/MD	MSA/MD Name	Tract	Tract Income Level	Minority Level	Minority Pct.	Black Minority Pct.	Hispanic	Minority Pct.	Distrsd / Undersvd	Hispanic Black Minority Pct.	Hispanic Black Minority Level	Asian Minority Pct.	Asian Minority Level
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	9900.00	0:NA	0	0	0	0	No	No	0	0	0	0
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.25	4:Upper	3	25.46	6.12	12.14	No	No	18.02	2	3.46	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.24	4:Upper	2	13.18	2.04	5.38	No	No	7.31	1	2.91	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.23	4:Upper	2	16.94	2.11	7.9	No	No	9.91	1	3.27	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.22	4:Upper	2	14.33	1.53	5.09	No	No	6.62	1	3.76	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.21	4:Upper	3	20.55	2.67	9.62	No	No	12.17	2	4.69	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.20	3:Middle	2	15.68	1.94	7.57	No	No	9.46	1	1.94	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.19	4:Upper	3	21.53	2.66	10.36	No	No	12.92	2	4.35	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.18	4:Upper	2	17.42	1.99	8.09	No	No	9.99	1	3.05	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.17	4:Upper	2	19.73	2.17	9.71	No	No	11.72	2	3.21	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.16	4:Upper	2	12.47	2.05	4.2	No	No	6.23	1	3.56	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.14	4:Upper	3	22.32	3.29	10.74	No	No	13.92	2	3.66	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.12	3:Middle	3	21.23	2.48	11.09	No	No	13.42	2	2.46	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.11	3:Middle	3	28.26	9.02	11.94	No	No	20.52	3	2.39	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.10	3:Middle	2	17.69	0.48	11.93	No	No	12.34	2	0.6	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.08	4:Upper	3	21.53	2.99	9.8	No	No	12.72	2	2.7	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.05	4:Upper	2	15.98	2.33	6.27	No	No	8.47	1	4.22	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0020.03	3:Middle	3	27.78	5.98	13.9	No	No	19.64	2	2.76	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.16	4:Upper	3	25.39	7.08	10.92	No	No	17.88	2	2.58	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.15	4:Upper	3	28.58	9.41	11.86	No	No	21.06	3	3.01	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.14	4:Upper	3	24.91	1.55	17.16	No	No	18.67	2	2.54	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.13	4:Upper	2	18.57	4.35	8.87	No	No	13.12	2	1.71	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.11	3:Middle	3	23.66	6.32	10.67	No	No	16.83	2	2.8	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.10	4:Upper	3	23.75	5.01	11.56	No	No	16.27	2	2.4	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.09	3:Middle	2	14.38	2.55	6.19	No	No	8.53	1	1.55	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.08	3:Middle	2	16.12	4.18	7.28	No	No	11.31	2	1.6	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.07	3:Middle	3	32.61	10.89	14.45	No	No	25.04	3	2.58	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0019.04	2:Moderate	3	34.72	9.66	18.91	No	No	28.36	3	2.36	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0018.02	4:Upper	1	7.16	0.25	3.29	No	No	3.54	1	0.91	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0018.01	3:Middle	1	8.08	0.22	3.41	No	No	3.63	1	0.99	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0017.05	4:Upper	1	6.66	0.33	2.88	No	No	3.2	1	1.13	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0017.01	3:Middle	1	7.8	0.66	3.39	No	No	4.05	1	0.66	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0016.04	2:Moderate	3	33.81	11.55	17.14	No	No	28.39	3	1.07	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0016.03	3:Middle	2	10.49	0.47	4.56	No	No	5.04	1	1.78	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0016.02	3:Middle	3	31.89	13.14	15.26	No	No	27.99	3	0.79	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.02	2:Moderate	4	72.59	29.59	40.3	No	No	69.62	4	0.61	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0015.01	2:Moderate	4	76.98	37.75	36.27	No	No	73.45	4	0.68	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.06	2:Moderate	3	23.46	4.72	14.42	No	No	19.15	2	1.36	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.05	3:Middle	3	47.57	6.54	37.1	No	No	43.52	3	0.8	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.04	4:Upper	3	35.92	6.12	23.94	No	No	29.94	3	1.01	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0014.02	3:Middle	2	16.6	1.72	11.55	No	No	13.21	2	0.27	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0013.00	3:Middle	3	28.19	3.47	19.72	No	No	22.98	3	0.29	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.04	4:Upper	1	8.99	0.78	3.86	No	No	4.64	1	0.98	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.03	3:Middle	2	15.13	2.14	7.31	No	No	9.46	1	2.05	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0012.02	3:Middle	2	13.44	1.16	6.05	No	No	7.13	1	1.35	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0011.08	3:Middle	2	10.8	1.04	5.68	No	No	6.44	1	0.88	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0011.07	2:Moderate	2	18.78	4.9	9.23	No	No	13.89	2	0.8	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0011.06	2:Moderate	3	41.67	17.03	19.07	No	No	35.62	3	1.79	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0011.05	3:Middle	3	27.78	9.34	11.52	No	No	20.54	3	2.58	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0011.04	2:Moderate	3	28.1	6.8	11.58	No	No	18.24	2	4.97	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0010.02	3:Middle	3	25.12	2.33	18.04	No	No	20.37	3	1.25	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0010.01	2:Moderate	3	25.17	4.14	16.65	No	No	20.61	3	0.83	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0009.02	3:Middle	3	39.99	11.2	22.2	No	No	33.02	3	1.87	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0009.01	3:Middle	3	42.42	7.72	28.51	No	No	35.86	3	1.84	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.14	3:Middle	3	22.05	3.4	8.58	No	No	11.8	2	7.17	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.13	3:Middle	3	28.12	4.85	11.23	No	No	15.88	2	7.16	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.12	3:Middle	3	47.1	10.59	29.61	No	No	39.72	3	3.29	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.11	1:Low	4	63.27	19.57	38.19	No	No	57.08	4	1.12	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.10	4:Upper	2	14.85	3.34	6.03	No	No	9.27	1	2.66	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.09	4:Upper	3	21.78	3.37	12.15	No	No	15.29	2	2.18	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.08	3:Middle	2	18.53	3.1	8.42	No	No	11.45	2	3.81	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.05	3:Middle	3	34.02	9.37	17.22	No	No	26.2	3	3.87	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0008.04	3:Middle	3	20.44	2.63	10.57	No	No	13.17	2	2.95	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0007.05	2:Moderate	4	71.26	33.29	35.25	No	No	67.86	4	0.85	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0007.04	2:Moderate	4	75.59	28.31	44.63	No	No	72.38	4	0.49	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0007.03	2:Moderate	4	70.31	34.31	30.93	No	No	64.76	4	1.12	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0006.04	2:Moderate	3	48.57	16.46	28.13	No	No	44.16	3	0.78	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0006.03	2:Moderate	3	43.49	7.16	31.27	No	No	37.93	3	1.47	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0006.01	2:Moderate	3	36.39	9.69	20.39	No	No	29.58	3	0.63	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0005.04	2:Moderate	3	28.92	4.24	16.62	No	No	20.8	3	1.96	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0005.03	4:Upper	3	22.57	3.08	13.28	No	No	16.18	2	1.86	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0005.01	3:Middle	3	25.33	4.92	13.97	No	No	18.67	2	1.19	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.10	2:Moderate	2	16.67	3.97	7.63	No	No	11.57	2	1.94	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.09	3:Middle	2	15.08	4.3	6.52	No	No	10.65	2	1.15	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.07	3:Middle	2	10.68	2.51	4.14	No	No	6.58	1	1.12	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.06	3:Middle	2	15.26	2.64	7.99	No	No	10.53	2	1.46	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.05	3:Middle	2	15.49	1.99	7.92	No	No	9.79	1	1.11	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0004.03	4:Upper	2	12.83	1.09	4.98	No	No	6.07	1	2.75	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.14	1:Low	4	50.85	8.11	40.						

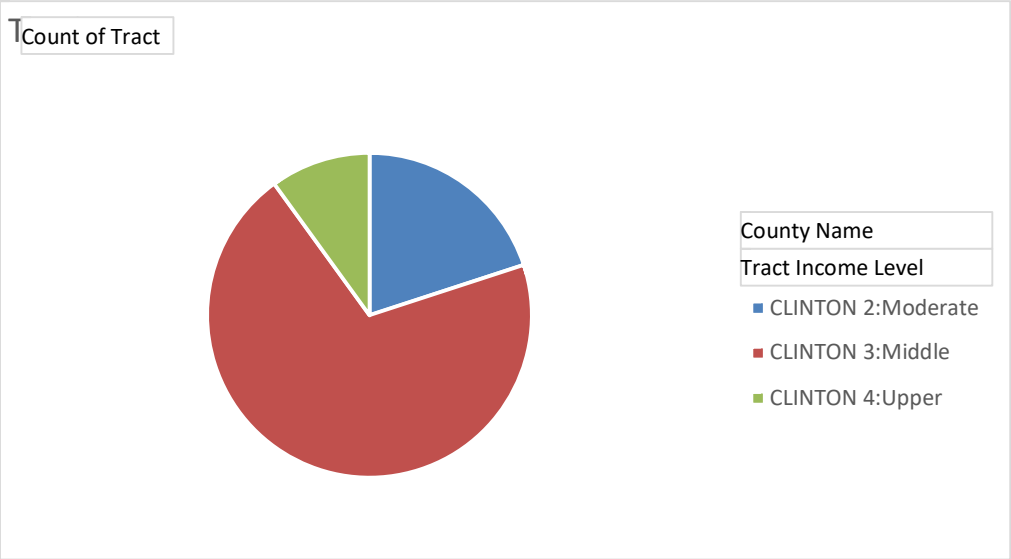
State ID	State	County ID	County Name	MSA/MD	MSA/MD Name	Tract	Tract Income Level	Minority Level	Minority Pct.	Black Minority Pct.	Hispanic Minority Pct.	Distrsd / Undersvd	Hispanic Black Minority Pct.	Hispanic Black Minority Level	Asian Minority Pct.	Asian Minority Level
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.13	1:Low	4	72.12	13.06	55.59	No	68.07	4	0.33	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.12	3:Middle	3	20.98	3.39	13.15	No	16.24	2	1.59	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.11	2:Moderate	3	39.09	12.45	21.37	No	33.33	3	1.58	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.10	2:Moderate	4	52.77	9.34	39.24	No	48.06	3	0.58	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.09	2:Moderate	4	52.32	13.27	33.76	No	46.72	3	1.31	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.07	2:Moderate	4	57.79	13.01	38.72	No	51.04	4	1.44	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.05	2:Moderate	5	82.12	12.19	67.4	No	78.7	4	0.46	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0003.04	2:Moderate	3	41.46	10.89	25.81	No	36.39	3	0.91	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0002.04	2:Moderate	2	12.08	0.55	7.86	No	8.41	1	0.86	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0002.03	2:Moderate	3	39.06	5.21	29.65	No	34.51	3	0.56	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0002.01	2:Moderate	3	25.32	6.4	13.01	No	19.26	2	1.64	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0001.06	2:Moderate	4	78.87	20.1	56.14	No	76.03	4	0.28	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0001.05	1:Low	4	70.92	18.88	49.34	No	67.59	4	0.69	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0001.03	2:Moderate	4	75.7	33.88	37.33	No	70.37	4	0.59	1
12	FL	081	MANATEE	35840	NORTH PORT-SARASOTA-BRADENTON, FL	0001.01	3:Middle	2	18.78	5.83	7.43	No	13.26	2	1.77	1



LIBERTY SAVINGS BANK, FSB - 2023 CRA - ASSESSMENT AREA INCOME MAP  
OHIO



Row Labels	Count of Tract
CLINTON	10
2:Moderate	2
3:Middle	7
4:Upper	1
Grand Total	10



State ID	State	County ID	County Name	MSA/MD	MSA/MD Name	Tract	Tract Income	Minority Level	Minority Pct.	Black Minority	Hispanic	Min Distrsd / Under	Hispanic	Black	Hispanic	Black	Asian	Minority	Asian	Minority Level
39	OH	027	CLINTON		9651.00	3:Middle	1	5.53	0.7	1.45	No	2.15	1	0.26	1					
39	OH	027	CLINTON		9650.00	3:Middle	1	5.84	0.28	1.55	No	1.83	1	0.08	1					
39	OH	027	CLINTON		9649.00	3:Middle	1	6.62	0.34	0.83	No	1.16	1	0.3	1					
39	OH	027	CLINTON		9648.00	3:Middle	1	6.87	0.64	1.76	No	2.4	1	0.39	1					
39	OH	027	CLINTON		9647.00	2:Moderate	2	15.18	6.13	2.55	No	8.52	1	0.83	1					
39	OH	027	CLINTON		9646.00	2:Moderate	2	16.46	5.15	3.49	No	8.65	1	0.52	1					
39	OH	027	CLINTON		9645.02	3:Middle	2	11.73	2.11	2.55	No	4.66	1	0.94	1					
39	OH	027	CLINTON		9645.01	3:Middle	2	13.18	4.29	2.11	No	6.28	1	1.79	1					
39	OH	027	CLINTON		9644.00	4:Upper	1	4.58	0.27	1.2	No	1.47	1	0.02	1					
39	OH	027	CLINTON		9643.00	3:Middle	1	6.8	0.54	1.54	No	2.08	1	0.14	1					

## SECTION 8

### Community Reinvestment Act Institution Disclosure Statement

## **LIBERTY SAVINGS BANK, F.S.B.**

### **CRA Institution Disclosure Statement**

CRA regulations require that the Community Reinvestment Act Institution Disclosure Statement be available to the public in conjunction with a financial institution's CRA Public File. This Disclosure Statement is in regards to small business, small farm, and community development lending activity.

Pursuant to this requirement, Liberty Savings Bank's CRA Institution Disclosure Statement for calendar year 2022 and prior years may be obtained from the web site of the Federal Financial Institutions Examination Council at [www.ffiec.gov](http://www.ffiec.gov).

## SECTION 9

### Home Mortgage Disclosure Act Statement (HMDA Statement)

## **LIBERTY SAVINGS BANK, F.S.B.**

### **HMDA Disclosure Statement**

CRA regulations require that data under the Home Mortgage Disclosure Act (HMDA) be available to the public in conjunction with a financial institution's CRA Public File. This data includes information regarding the geographic distribution of loans and applications; the ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials.

Pursuant to this requirement, Liberty Savings Bank's HMDA Disclosure Statement for calendar years 2021 and 2022 may be obtained from the web site of the Consumer Financial Protection Bureau at [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).

## SECTION 10

### Community Reinvestment Act Underwriting Policy



**LIBERTY SAVINGS BANK, FSB**  
**COMMUNITY REINVESTMENT ACT UNDERWRITING POLICIES**  
**November, 2023**

**Underwriting Policies**

The following underwriting policies were developed and are utilized by Liberty Savings Bank, FSB, (Liberty) in evaluating applications for the credit products and services offered by Liberty. These products and services include consumer loans, mortgage loans, and lines of credit. Liberty is an “Equal Opportunity Lender” and promotes the availability of credit on a nondiscriminatory basis. Liberty will grant credit to qualified applicants regardless of:

- Age or location of the dwelling being used for collateral
- Race
- Color
- Religion
- National origin
- Sex (including gender, gender identity, sexual orientation, and sexual harassment)
- Marital status
- Age (provided the applicant has the capacity to contract)
- The applicant’s receipt of income derived from any public assistance program
- The applicant’s exercise, in good faith, of any right under the Consumer Credit Protection Act
- Familial status (defined as children under the age of 18 living with a parent or legal custodian, pregnant women, and people securing custody of children under 18)
- Handicap

The primary geographic locations for extending credit by Liberty are its Community Reinvestment Act (CRA) delineated assessment areas. These areas are Sarasota and Manatee Counties in Florida. However, Liberty will accept applications for credit and grant credit to qualified applicants without regard to geographic area.

Liberty grants credit through the Residential Mortgage Lending Department.

Request for credit shall be in writing on a standard Liberty application form or other approved form. To analyze the applicant’s creditworthiness, Liberty will generally obtain a credit report, verify the applicant’s employment and/or source of income, verify the applicant’s assets and secure an appraisal of any property to be used as collateral.

## **Residential Mortgage Lending**

Liberty offers 1 to 4 family residential real estate mortgage loans facilitated in our regional loan processing center in Wilmington, Ohio. This processing center enables Liberty to provide effective and timely service to its customers.

Liberty has various real estate loan products, including fixed rate and adjustable rate mortgages. Loans are available for owner occupied dwellings, second homes and investment properties. Purchase money mortgages and refinance loans can be obtained through Liberty.

Liberty generally utilizes the Uniform Residential Loan Application (URLA) for mortgage loan requests. The fully completed application is the basis for underwriting the request for credit.

The applicant's creditworthiness will be determined by considering the following:

- Adequacy of monthly income
- Stability of employment and/or income
- Monthly housing expense to income ratio
- Monthly debt payment to income ratio
- Residual income
- Credit history
- Adequacy and source of liquid assets needed for the down payment and loan closing costs
- Appraisal of the property being used for collateral

Typically, Liberty will verify stability of employment and income directly with the applicant's employer. In some instances, alternate documentation such as IRS W-2 forms or payroll stubs may be accepted. For self-employed applicants, complete Federal tax returns for the most recent two years and a year-to-date profit and loss statement are typically required. For income received from other sources, verification and/or documentation will be required that shows a history of receipt of the income and/or evidence of continuance of the income. Verified income must be sufficient to enable the applicant to satisfy all financial obligations.

The applicant should have an established and satisfactory credit history. Liberty will obtain a credit report to analyze the applicant's credit habits, ability to manage financial affairs and the manner in which debts are repaid. Any derogatory credit information on a credit report may result in the application being denied.

Sufficient liquid assets must be available to the applicant to provide the necessary funds for the down payment and closing costs. Liberty will generally verify the source of the funds directly with the appropriate source. In some instances, alternate documentation such as bank statements or investment account statements may be accepted. If a gift is used as a source of funds, a satisfactory letter from the donor must be obtained and the transfer of funds must be adequately documented.

Liberty may obtain a Uniform Residential Appraisal Report (or such other form as may be acceptable to the investor) from an approved appraiser that is licensed or certified by the state in which the property is located. Appraisals will be prepared in accordance with the Uniform

Standards of Professional Appraisal Practice (USPAP) and the guidelines established by Fannie Mae, Freddie Mac, and the OCC as applicable. The appraisal will be analyzed to determine the acceptability of the collateral in relation to the type of loan and the amount of the loan requested.

### **General Underwriting Criteria**

Following this policy is Appendix A, which shows general underwriting criteria for each of the lending programs discussed above. However, Appendix A is not intended to be a substitute for the detailed underwriting policies that are used in actual underwriting circumstances. Rather, it is to be used as a general guideline in understanding typically acceptable ranges in the underwriting criteria used. There are criteria that may not be listed in Appendix A. In addition, there are situations that merit making exceptions to these guidelines, such as a credit strength balancing a credit weakness. Conversely, some credit weaknesses cannot be overcome by credit strengths. The ranges depicted should therefore not be considered absolute. Underwriting criteria do periodically change, and Appendix A may not reflect the most recent changes.

## Appendix A

### General Underwriting Criteria for Standard Programs

<b>Residential Mortgage Lending</b>	<b>Maximum Debt to Income Ratio</b>	<b>Minimum Credit Score</b>	<b>Maximum Loan to Value Ratio</b>
Fixed Conventional	Based on Investor Guidelines	Based on Investor Guidelines	Based on Investor Guidelines
ARM Conventional	Based on Investor Guidelines	Based on Investor Guidelines	Based on Investor Guidelines
Non-Conforming	Based on Investor Guidelines	680	Based on Investor Guidelines

## SECTION 11

Loan to Deposit Ratios by Quarter  
Calendar Years 2021, 2022, and 2023

**Liberty Savings Bank**  
**Loan to Deposit Ratio**

Call Report  
Reference:

		3/31/2023	6/30/2023	9/30/2023	12/31/2023
Loans (\$000s)	RC line 4b	866,378	862,610	887,234	867,359
Deposits (\$000s)	RC line 13a	975,078	925,013	888,204	882,410
Loan/Deposit Ratio		88.9%	93.3%	99.9%	98.3%

		3/31/2022	6/30/2022	9/30/2022	12/31/2022
Loans (\$000s)	RC line 4b	674,995	833,471	811,774	795,180
Deposits (\$000s)	RC line 13a	1,017,344	928,514	1,036,760	973,017
Loan/Deposit Ratio		66.3%	89.8%	78.3%	81.7%

		3/31/2021	6/30/2021	9/30/2021	12/31/2021
Loans (\$000s)	RC line 4b	554,662	515,950	564,718	701,203
Deposits (\$000s)	RC line 13a	844,772	802,925	736,004	857,720
Loan/Deposit Ratio		65.7%	64.3%	76.7%	81.8%