

# **PUBLIC DISCLOSURE**

**January 5, 2009**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Bank of Greensburg  
Certificate Number: 1372**

**6151 Highway 10  
Greensburg, Louisiana 70441**

**Federal Deposit Insurance Corporation  
Division of Supervision and Consumer Protection  
Dallas Region – Memphis Area Office  
5100 Poplar Avenue, Suite 1900  
Memphis, Tennessee 38137**

**NOTE:**

**This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

## INSTITUTION RATING

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

Bank of Greensburg received a Community Reinvestment Act (CRA) rating of “Satisfactory” at its prior evaluation dated November 25, 2003.

The bank’s CRA performance depicts an excellent record of providing for the credit needs of its assessment area. The following is a summary of conclusions derived from the evaluation of each factor to support this rating. Performance under each factor is detailed elsewhere in this evaluation. Additionally, management requested a review of the bank’s qualified investments, retail banking services, and Affordable Small Dollar Loan Program for this evaluation.

- The bank’s net loan-to-deposit ratio reflects a reasonable responsiveness to community credit needs based on the length of time this institution has been established, loan demand, and the economic and demographic data for the community.
- The institution displayed a reasonable record of originating loans inside its assessment areas. A majority of loans reviewed were originated within the bank’s assessment area.
- The bank depicted excellent performance in extending credit to borrowers of different incomes and businesses of different sizes.
- The institution demonstrated a reasonable penetration of lending within its assessment area.
- The bank has not received any CRA-related complaints since the bank’s previous evaluation.

### **Investments and Retail Banking Services**

The Bank of Greensburg has established an excellent responsiveness to the community development needs by dollar volume of qualified investments reviewed. The bank provided a total of \$2,950,000, or 4.13 percent of average assets.

The bank demonstrated a good record of offering retail banking systems that help to enhance the availability of credit considering the nature of the assessment area. Additionally, the bank provided various services free of charge to customers and non-customers during the aftermath of Hurricane Katrina in 2005 and Hurricane Gustav in 2008. All of the bank’s assessment area remains a federally declared designated disaster area.

### **Affordable Small Dollar Loan Program**

Since the last evaluation, the bank has implemented an Affordable Small Dollar Loan Program to help residents of the bank’s assessment area with consumer loans. The bank’s program allows customers the ability to borrow money in smaller loan amounts with fixed payment streams.

\$600,000 on March 27, 2006, that matured March 1, 2007. Greensburg is in a moderate-income level census tract with a minority level of 47 percent. The current certificate will mature on February 26, 2009.

- **Senior Housing Crime Prevention Foundation Series L Bonds (SHCPF)**

The Bank of Greensburg made an investment of \$250,000 in Series L Preferred Stock of the SHCPF on July 31, 2007. This is a non-profit organization which provides for a crime reporting program in nursing homes to protect residents and provides lock boxes for the residents. The program also gives cash rewards to people who call the 24-hour hotline with tips regarding crimes in any nursing facility using the program. The investment sponsors the St. Helena Parish Nursing Home located in Greensburg, Louisiana. The St. Helena Parish Nursing Home is located in a moderate-income census tract within a federally declared designated disaster area.

## **Retail Banking Services**

The bank demonstrated a good record of offering retail banking systems that help to enhance the availability of credit considering the nature of the assessment area. Examples of these include the following applications:

- Bank of Greensburg's 24-hour internet banking offers a variety of bank-at-home services. Customers may check account balance information and transaction history, access deposit rate information, make loan payments, and transfer funds between deposit accounts. There is also an internet banking program for commercial accounts.
- The bank has four automated teller machines (ATMs) that are located at each banking office.
- All of the bank's facilities offer a complete line of banking products and services. Lobby hours are reasonable with hours of operations between 9:00 a.m. and 5:30 p.m. Additional drive-thru hours are available for each location. The Bank of Greensburg's office locations adequately serve each geographic location within its assessment area. Three of the four bank locations serve moderate-income areas.
- The bank offers consumer and business banking services. Consumer products include Certificate of Deposits, Individual Retirement Accounts, Free Personal checking, NOW Account, Savings Account, Certificate of Deposit Account Registry Services (CDARS), and Christmas Club Accounts. Business deposit products include Business Checking, CDARS, Public Funds Checking Account, Public Funds NOW Account, and Business Money Market Accounts. The bank offers an array of consumer, real estate, and commercial loans. The bank also provides the following services: Personal and Commercial ATM/debit card, direct deposit, telephone transfers, wire transfers, stop payments, and night deposit boxes.
- The bank provided a range of accommodations and services for victims of Hurricane Katrina in 2005 and Hurricane Gustav in 2008. For both hurricanes, the bank waived check cashing, ATM, wire fees, and raised ATM usage limitations. In addition, the wire policy was temporarily amended so customers would be able to utilize wiring services by providing one form of identification instead of two. Non-sufficient funds (NSF) fees were waived on all accounts and overdraft fees were refunded. The loan department approved loan payment extensions and waived late fees.