



PUBLIC DISCLOSURE

Date of Evaluation: OCTOBER 7, 2024

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Name of Depository Institution: AMERICAN BANK

Institution's Identification Number: 2580243

Address: 4029 WEST TILGHMAN STREET

ALLENTOWN, PENNSYLVANIA

**FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106**

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 the 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.

Table of Contents

INSTITUTION'S CRA RATING.....	1
INSTITUTION'S CRA RATING: SATISFACTORY.....	1
PERFORMANCE TEST RATINGS TABLE	1
SUMMARY OF MAJOR FACTORS SUPPORTING RATING	1
 INSTITUTION	 2
DESCRIPTION OF INSTITUTION	2
SCOPE OF EXAMINATION.....	18
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	19
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES	43
 CRA APPENDICES	 44
CRA APPENDIX A: SCOPE OF EXAMINATION TABLE.....	45
CRA APPENDIX B: SUMMARY OF STATE RATING.....	46
CRA APPENDIX C: GLOSSARY.....	47
CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES	50
CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES	63
CRA APPENDIX F: ASSESSMENT AREA MAPS.....	69

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: SATISFACTORY

The following table indicates the performance level of American Bank (American) with respect to the lending, investment, and service tests.

PERFORMANCE TEST RATINGS TABLE

PERFORMANCE LEVELS	American Bank		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- An adequate percentage of loans are made in the bank's assessment area;
- The borrower distribution of loans reflects good penetration among business customers of different sizes, and poor penetration among retail customers of different income levels;
- The geographic distribution of loans reflects good penetration throughout the assessment area;
- The bank has made a relatively high level of community development loans;
- The bank has made a significant level of qualified investments and donations; and
- The bank provides an adequate level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

American was rated satisfactory at its previous CRA evaluation dated September 23, 2019, which used the Interagency Large Institution CRA Examination Procedures.

American, headquartered in Allentown, Lehigh County, Pennsylvania, is a state-chartered full-service commercial bank offering a variety of consumer and commercial banking services. American is wholly-owned by American Bank Incorporated, a single bank holding company.

The bank has one branch located in the Allentown-Bethlehem-Easton, PA-NJ metropolitan statistical area (Allentown, PA MSA), and operates one commercial loan production office (LPO) in Blue Bell, Montgomery County, PA, adjacent to the Allentown, PA MSA. The bank's single branch and LPO are located in upper-income tracts as of the 2015 American Community Survey (ACS) and 2020 Census¹. The bank operates two automated teller machines (ATMs), one full-service ATM at the branch, and a cash-only ATM at Lehigh Carbon Community College in Schnecksville, Lehigh County, PA.

The following table details the locations of American's branch and LPO as of the evaluation date.

American Bank Branch Locations			
Assessment Area	County	State	Number of Branches / Offices
Full-Service Branches			
Allentown, PA	Lehigh	Pennsylvania	1
Total Full-Service Branches			1
Loan Production Offices			
Blue Bell, PA	Montgomery	Pennsylvania	1
Total Loan Production Offices			1

According to the Consolidated Reports of Condition and Income (Call Report) as of June 30, 2024, American reported \$920 million in assets, of which \$764 million, or 83%, were loans.

On a dollar volume basis, commercial loans (comprised of commercial mortgages and commercial and industrial loans) represent the largest segment of the bank's loan portfolio, at \$512 million or 67% of the loan portfolio. Residential loans (comprised of open-end and closed residential properties, and multifamily loans) represented the second largest segment of the loan portfolio, at \$188 million or 25% of all loans. Finally, construction and land development made up the third largest segment of the bank's loan portfolio, comprising \$61 thousand or 8% of the portfolio.

¹The LPO location was classified as a middle-income tract as of the 2015 ACS update, but changed to an upper-income tracts at the 2020 Census.

LARGE INSTITUTION PERFORMANCE EVALUATION

OCTOBER 2024

The composition of the bank's loan portfolio as of June 30, 2024 is presented in the following table.

American Bank		
LOANS as of 06/30/2024	\$ (000s)	%
Loans Secured by Nonfarm Nonresidential Properties (Commercial Mortgages)	423,169	55.4
Commercial and Industrial Loans	89,262	11.7
Secured by Farmland	494	0.1
Secured by Residential Properties (Closed-end)	126,026	16.5
Secured by Residential Properties (Open-end)	5,686	0.8
Secured by Multifamily Residential Properties	56,047	7.3
Construction & Land Development	60,579	7.9
Consumer Loans	866	0.1
Loans to Finance Agricultural Production & Other Loans to Farmers	0	0.0
States and Political Subdivisions	0	0.0
Other Loans	1,832	0.2
Other Leases	0	0.0
TOTAL LOANS	763,961	100.0

Small Business Loans

Schedule RC-C Part II (Loans to Small Businesses and Small Farms) of the Call Report as of June 30, 2024 indicates that \$163 million (32%) of the bank's outstanding commercial loans² were designated as small business loans. At the previous CRA evaluation, American's outstanding commercial loan volume was at \$358 million, of which \$105 million (29%) was designated as small business loans. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less, as detailed in the table below.

American Bank Small Business Loans		
	Amount Outstanding as of 06/30/2024 \$ (000s)	%
Loans with original amounts of \$100,000 or less	12,354	2.4
Loans with original amounts of \$100,001 through \$250,000	29,444	5.8
Loans with original amounts of \$250,001 to \$1 million	121,541	23.7
TOTAL SMALL BUSINESS LOANS	163,339	31.9
Loans with original amounts of more than \$1,000,000	349,092	68.1
TOTAL COMMERCIAL LOANS	512,431	100.0

The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of its assessment area. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

DESCRIPTION OF ASSESSMENT AREAS

For the purposes of the CRA, American's single Allentown, PA assessment area includes the Allentown, PA MSA, which is coterminous with the entirety of Lehigh, Northampton, and Carbon Counties in Pennsylvania, and Warren County, in New Jersey.

² Commercial loans are comprised of loans secured by nonfarm nonresidential properties, along with commercial and industrial loans.

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

There have been no changes to the bank's assessment area since the previous CRA evaluation. The bank's assessment area was determined to comply with the requirements of the CRA, and do not arbitrarily exclude low- or moderate-income census tracts.

2015 ACS Data

Based on 2015 ACS data, the Allentown, PA MSA had 179 census tracts, of which 16 were low-income (9%), 34 were moderate-income (19%), 78 were middle-income (44%), and 51 were upper income (28%). Of the 16 low-income census tracts, 11 were in Lehigh County, four were in Northampton County, and one was in Carbon County. Of the 34 moderate-income tracts, 14 were located in Lehigh County, 14 were in Northampton County, three were in Carbon County, and three were in Warren County. According to the 2015 ACS data, the assessment area had a population of 828,232, with 27% of the population residing in the low- and moderate-income census tracts.

2020 Census Data

Based on the 2020 Census data, the Allentown, PA MSA had 195 census tracts, of which 15 were low-income (8%), 44 were moderate-income (23%), 81 were middle-income (41%), and 55 were upper-income (28%). Of the 15 low-income census tracts, 12 were in Lehigh County, two were in Northampton County, and one was in Carbon County. Of the 44 moderate-income census tracts, 17 were in Northampton County, 16 were in Lehigh County, seven were in Carbon County, and four were in Warren County. The assessment area's population increased to 861,889, with 28% of the population residing in low- and moderate-income census tracts.

Maps of the assessment area at the 2015 ACS update, and the 2020 Census are available in Appendix F.

American's performance was evaluated in terms of the demographic and economic context in which the bank operates. Banking in the assessment area is highly competitive, and local competition includes Embassy Bank for the Lehigh Valley, New Tripoli Bank, Mauch Chunk Trust Company, and First Northern Bank and Trust Company. In addition, the following large banks have a significant market presence in the assessment area such as Wells Fargo, N.A.; PNC Bank, N.A.; Truist Bank; and Fulton Bank, N.A.

According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2024, there were 33 depository institutions operating in the bank's assessment area. These institutions maintained a total of 191 banking offices, holding \$22 billion in deposits. American ranked eighth with \$736 million in deposits, or 3% of the deposit market share. Wells Fargo Bank, N.A. held the largest market share of deposits with almost 18% of the deposit market. PNC Bank, N.A. ranked second with 11% of the market, and Truist Bank was ranked third with 10% of the deposit market.

American reports home-mortgage loans pursuant to the Home Mortgage Disclosure Act (HMDA) and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data are reported annually. Annual data below provides context on the relative market share for HMDA loans in the assessment area for the years included in the CRA evaluation.

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

According to the 2018 data, there were 520 HMDA reporters in the assessment area, who originated or purchased 24,298 home mortgage loans. American ranked sixty-third among these institutions, with less than 1% of the HMDA market, originating 78 loans. Wells Fargo Bank, N.A. led the home-mortgage market with 10% of HMDA loans. Quicken Loans, Inc. ranked second with just under 4% of the HMDA market, followed by PNC Bank, N.A. also with just under 4% of the market.

According to the 2019 data, there were 526 HMDA reporters in the assessment area, who originated or purchased 28,159 home mortgage loans. American ranked fifty-third, with less than 1% of the market, originating 110 loans. Again, Wells Fargo Bank, N.A. ranked first with just under 10% of the market, followed by Quicken Loans, Inc. with 4% of the market, and PNC Bank, N.A. with 3% of the market.

According to the 2020 data, there were 573 HMDA reporters in the assessment area, who originated or purchased 38,012 loans. American ranked fifty-fifth, with less than 1% of the HMDA market, originating 144 loans. Similar to prior years, Wells Fargo Bank, N.A. ranked first with 8% of the HMDA market, and Quicken Loans, LLC ranked second with 7% of the market. Caliber Home Loans, Inc. ranked third with 3% of the HMDA market.

According to the 2021 data, there were 624 HMDA reporters in the assessment area, who originated or purchased 42,522 home mortgage loans. American tied for sixty-first with less than 1% of the market, originating 145 loans. Rocket Mortgage, LLC ranked first with 8% of the HMDA market, followed by Wells Fargo Bank, N.A. with 6% of the market share. CrossCountry Mortgage, Inc. ranked third with 3% of the market.

According to the 2022 data, there were 554 HMDA reporters in the assessment area, who originated or purchased 26,676 home mortgage loans. American ranked sixtieth, with less than 1% of the HMDA market, originating 90 loans. Wells Fargo Bank, N.A. ranked first with 5% of the HMDA market, followed by Rocket Mortgage, LLC with close to 5% of the market. First Commonwealth Federal Credit Union ranked third with close to 4% of the HMDA market.

Finally, in 2023, there were 526 HMDA reporters in the assessment area, who originated or purchased 18,716 loans. American ranked forty-seventh, with less than 1% of the market, originating 89 loans. Rocket Mortgage, LLC ranked first with nearly 5% of the HMDA market, followed by First Commonwealth Federal Credit Union with just under 5% of the market. Pennymac Loan Services, LLC ranked third with 4% of the market share.

Similarly, the bank reports its small business loans pursuant to the CRA, and was compared to the aggregate of all small business and small farm reporters in the assessment area. Small business market share is discussed below for the years included in the CRA evaluation.

According to the 2019 CRA data, there were 124 small business reporters, who originated or purchased 17,541 small business or small farm loans in the assessment area. American ranked twenty-third among the institutions in 2019, with less than 1% of the small business market, originating 104 small business loans. American Express, N.B. ranked first with 18% of the small business market, followed by JP Morgan Chase Bank, N.A. with 12% and Wells Fargo Bank, N.A. with 8% of the market.

According to the 2020 CRA data, there were 164 small business reporters in the assessment area, who originated or purchased 19,528 small business or small farm loans. American ranked thirty-third with less than 1% of the small business market, originating 93³ small business loans. American Express, N.B. ranked first with nearly 13% of the small business market, followed by Wells Fargo Bank, N.A. with 9%, and PNC Bank, N.A. with 7% of the market.

According to the 2021 CRA data, there were 159 small business reporters in the assessment area, who originated or purchased 21,632 small business or small farm loans. American ranked twenty-eighth with less than 1% of the small business market, originating 116⁴ small business loans. American Express, N.B. ranked first with 16% of the small business market, followed by Wells Fargo Bank, N.A. with just under 9%, and JP Morgan Chase Bank, N.A. with 7% of the market.

According to the 2022 CRA data, there were 128 small business reporters in the assessment area, who originated or purchased 20,678 small business or small farm loans. American ranked twenty-first with less than 1% of the small business market, originating 108 small business loans. Again, American Express, N.B. ranked first with 21% of the small business market. JP Morgan Chase Bank, N.A. followed in second with over 10%, and Synchrony Bank ranked third with 7% of the small business market.

Finally, in 2023, there were 116 small business reporters in the assessment area, who originated or purchased 18,448 small business or small farm loans. American ranked twenty-first with less than 1% of the small business market, originating 70 small business loans. Again, American Express, N.B. ranked first with 23% of the small business market, followed by JP Morgan Chase Bank, N.A. with 13%, and Synchrony Bank with 8% of the small business market.

To supplement economic, demographic and performance data, and to gain a better perspective on the credit and community development needs of the Allentown, PA assessment area, interviews were conducted with two local community organizations. More specifically, discussions were held with a housing authority organization and an economic development organization.

Community contacts raised concerns about the lack of affordable housing, and a need for more gainful employment in the assessment area. One community contact noted that financial institutions are not hearing the needs of the county with respect to housing and small business lending. The other community contact noted the need for financial literacy within the community.

ECONOMIC CHARACTERISTICS

As indicated above, American's single assessment area consists of the Allentown, PA MSA, which includes the entirety of Lehigh County, Northampton County, and Carbon County in Pennsylvania, and Warren County in New Jersey. The Allentown, PA MSA is situated between the Philadelphia and New York City metropolitan areas, and is part of the Allentown-Bethlehem-East Stroudsburg, PA-NJ Combined Statistical Area.

³ In 2020, 401 PPP loans were not reported in the CRA Market Peer Reports by American Bank. As such, the 2020 peer ranking for American Bank does not include the PPP loans, however, this did not affect the overall CRA rating.

⁴ In 2021, 265 PPP loans were not reported in the CRA Market Peer Reports by American Bank. As such, the 2021 peer ranking for American Bank does not include the PPP loans, however, this did not affect the overall CRA rating.

LARGE INSTITUTION PERFORMANCE EVALUATION

OCTOBER 2024

According to the Moody's Analytics January 2024 Precise report for the Allentown, PA MSA, the area economy is in mid-expansion mode, and has resumed growing more quickly than Pennsylvania, and is on par with the U.S. national economy. About half of the private industries in the area are adding jobs to the market with healthcare and hospitality/leisure being the market leaders. On the other hand, manufacturing and logistics jobs have experienced downturns.

According to Moody's, the Allentown, PA MSA's strengths include the proximity to East Coast ports, densely populated metro areas, and below-average costs of living and doing business. The low cost of living promotes resident inflows and boosts services and housing. Weaknesses described by Moody's include an aging population, high employment volatility relative to the United States, and below-average educational attainment.

According to Moody's, Top industries include education and health services (21%), professional and business services (13%), manufacturing (10%), retail trade (10%), and government (10%). Top employers in the Allentown, PA MSA include Lehigh Valley Health Network, St. Luke's University Health Network, Walmart Inc., and Dorney Park/Wildwater Kingdom.

During the evaluation period, seasonally unadjusted unemployment rates for the Allentown, PA MSA generally have remained slightly higher than Pennsylvania and the nation as a whole. The highest unemployment rates in the Allentown, PA MSA are present in Carbon County, followed by Lehigh County then Northampton County. In most years, unemployment rates were lowest in Warren County, NJ. As a result of the COVID-19 pandemic, unemployment rates increased substantially in 2020. However, the pandemic's impact on unemployment was short-lived, as evident by the decrease in unemployment in 2021, 2022, and 2023.

Seasonally unadjusted unemployment rates for the years 2018, 2019, 2020, 2021, 2022, and 2023, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table.

American Bank Allentown, PA MSA Unemployment Rates (Annual, Not Seasonally Adjusted)						
Location	% 2018	% 2019	% 2020	% 2021	% 2022	% 2023
Lehigh County, PA	4.7	4.5	9.3	6.3	4.1	3.6
Northampton County, PA	4.6	4.4	8.7	5.5	3.9	3.5
Carbon County, PA	5.2	5.3	9.5	6.2	4.7	3.9
Warren County, NJ	3.7	3.3	8.2	5.9	3.6	4.0
Allentown, PA MSA	4.6	4.4	9.0	6.0	4.0	3.6
Pennsylvania	4.4	4.3	8.9	5.9	4.1	3.4
New Jersey	4.0	3.5	9.4	6.7	3.9	4.4
United States	3.9	3.7	8.1	5.3	3.6	3.6

Source: Unemployment data is from the Bureau of Labor Statistics.

HOUSING

2015 ACS Data

According to 2015 ACS data, the Allentown, PA assessment area contained 343,976 housing units, of which 64% were owner-occupied, 27% were rental units, and 9% were vacant. The overall owner-

occupied rate in the assessment area (64%) was slightly higher than in the Commonwealth of Pennsylvania as a whole (61%), and in New Jersey (57%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home mortgage credit within such tracts. According to 2015 ACS data, only 3% of owner-occupied housing units were located in low-income tracts, and 14% of owner-occupied housing units were located in moderate-income tracts. In contrast, 44% of owner-occupied housing units were located in middle-income tracts, and 39% of owner-occupied housing units were located in upper-income tracts.

Of the total existing housing units in the Allentown, PA MSA, 77% were single family units, 9% were two-to-four family units, and 12% were multifamily units, defined as dwellings consisting of five or more units of housing. The remaining 2% of housing stock comprised of mobile homes. The median age of the housing stock in the MSA was 55 years, compared to a statewide median age of 54 in Pennsylvania, and 49 in New Jersey. Furthermore, the median age of the MSA's housing stock in both low- and moderate-income census tracts was 61 years, compared to the median age of the housing stock in middle-income tracts of 56 years, and housing stock in upper-income tracts of 38 years. This may indicate a particular need for home-improvement lending in low- and moderate-income tracts, to rehabilitate the aged housing stock.

Data show that the price of housing in the assessment area is slightly more expensive than in the Commonwealth of Pennsylvania, but is outpaced by the median housing value in New Jersey. The median housing value in the assessment area was \$199,777, and the median housing value in Pennsylvania was \$166,000, while it measured \$315,900 in the state of New Jersey. Data show a disparity between housing values in low- and moderate-income tracts compared to those located in middle- and upper-income tracts. The median housing value in low-income tracts was \$89,071, and \$132,100 in moderate-income tracts. These values were lower than median housing values in middle- and upper-income tracts (\$185,926 and \$266,335 respectively). In the assessment area, less than 14% of the total owner-occupied housing units were valued at less than \$100 thousand. This measure indicates that the housing stock in the assessment area is less affordable than in the Commonwealth of Pennsylvania as a whole, where 26% of owner-occupied units are less than \$100 thousand, but more affordable than the State of New Jersey, where only 6% of units are less than \$100 thousand.

Finally, median gross rent (rent plus utilities) was higher in the Allentown, PA assessment area compared to the Commonwealth of Pennsylvania, but less than the median gross rent in New Jersey. Median gross rent in the assessment area was \$941, which was above the median gross rent in Pennsylvania at \$840, but below the same measure in New Jersey at \$1,192. Within the Allentown, PA MSA, the percentage of renters spending more than 30% of their income on rent was 50%, which was slightly higher than the percentage in Pennsylvania (46%), and on par with New Jersey (51%).

2020 Census Data

According to 2020 census data, the Allentown, PA assessment area contained nearly 350,620 housing units, of which 64% were owner-occupied, 29% were rental units, and 7% were vacant. The overall occupancy rate in the assessment area of 64% exceeded that of the Commonwealth of

Pennsylvania which reported 62%, and the State of New Jersey at 58%. Disparities continued to exist between owner-occupied rates in low- and moderate-income census tracts compared to middle- and upper-income tracts. Of the housing units in low-income tracts, less than 3% was owner-occupied, and in moderate-income tracts, 16% was owner-occupied. By contrast, 43% of the housing units in middle-income tracts was owner-occupied, and 38% of the housing stock was owner-occupied in upper-income tracts.

Of the total existing housing units, 78% were single-family units, 8% were two-to-four family units, 12% were multifamily units (five families or more), and 2% were mobile homes. The median age of the housing stock in the assessment area was 58 years, making it comparable to the statewide median age of 57 years in Pennsylvania, but older than the housing stock in New Jersey, at 52 years. As in the 2015 ACS data, the median age of the MSA's housing stock in both low- and moderate-income census tracts was 61 years, which is older than the median age in middle-income tracts (58 years) and significantly older than the median age in upper-income tracts (43 years).

Data show that the price of housing in the assessment area is slightly more expensive than in the Commonwealth, but less than the stock in the State of New Jersey. According to 2020 census data, the median housing value in the Allentown, PA MSA was \$219,210, which is above the median housing value in the Commonwealth of Pennsylvania of \$187,500, and less than in New Jersey at \$343,500. Furthermore, the data depicts a disparity between housing values in low- and moderate-income tracts compared to those in middle- and upper-income tracts. The median housing value in low-income tracts was \$96,659, and this increased to \$142,660 in moderate-income tracts. The middle- and upper-income tracts reported \$200,116 and \$291,190 respectively. In the assessment area, less than 11% of total owner-occupied units were valued at less than \$100,000. This compared to a percentage of 21% for the Commonwealth of Pennsylvania, and only 5% for the State of New Jersey.

Finally, median gross rent (rent plus utilities) was slightly higher in the Allentown, PA assessment area compared to Pennsylvania, but less than in New Jersey. Median gross rent in the assessment area was \$1,090, which was slightly above the median gross rent in Pennsylvania at \$958, and lower than rents in New Jersey at \$1,368. Within the assessment area, 47% of renters spent more than 30% of their income on rent, which is slightly higher than that in Pennsylvania as a whole (43%), and lower than the same measure in New Jersey (48%).

BORROWER INCOME

2015 ACS Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 214,409 families in the assessment area.

Of the total families in the assessment area, 21% were designated as low-income, 18% were designated as moderate-income, 21% were middle-income, and 40% were upper-income families. According to the 2015 ACS data, 8% of families were living below the poverty level, which was

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

slightly below the same measure in Pennsylvania (9%), and consistent with the measure in New Jersey (8%).

2020 Census Data

The 2020 Census data shows that there were 217,900 families in the assessment area. Of the total families in the assessment area, 20% were designated as low-income, 18% were designated as moderate-income, 21% were middle-income, and 41% were upper-income. According to the 2020 Census data, 7% of the families in the assessment area were living below the poverty level, which was slightly below the same measure in Pennsylvania (8%), and consistent with the level in New Jersey (7%).

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the Federal Financial Institutions Examination Council (FFIEC). Median family incomes for the assessment area are listed in the following table for each of the years covered by the evaluation, and are categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2018	\$76,100	Less than \$38,050	\$38,050 - \$60,879	\$60,880 - \$91,319	\$91,320 or more
2019	\$80,200	Less than \$40,100	\$40,100 - \$64,159	\$64,160 - \$96,239	\$96,240 or more
2020	\$80,400	Less than \$40,200	\$40,200 - \$64,319	\$64,320 - \$96,479	\$96,480 or more
2021	\$84,900	Less than \$42,450	\$42,450 - \$67,919	\$67,920 - \$101,879	\$101,880 or more
2022	\$94,300	Less than \$47,150	\$47,150 - \$75,439	\$75,440 - \$113,159	\$113,160 or more
2023	\$99,500	Less than \$49,750	\$49,750 - \$79,599	\$79,600 - \$119,399	\$119,400 or more

GEOGRAPHIC BUSINESS DATA**2015 ACS Data**

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to 2019 Dun & Bradstreet data, there were 37,918 businesses located in the bank's assessment area. Of these businesses, 6% were located in low-income census tracts, 16% were located in moderate-income tracts, 41% were located in middle-income tracts, and 37% were located in upper-income tracts. Business demographic data also revealed that of the 37,918 businesses located in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

In 2020, the total number of businesses decreased to 35,839. Of these businesses, 6% were located in low-income census tracts, 16% were in moderate-income tracts, 40% were in middle-income tracts, and 38% were in upper-income tracts. Of the 35,839 businesses located in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

In 2021, the total number of businesses decreased to 35,032. Similar to the previous year, 6% of businesses were located in low-income census tracts, 16% were in moderate-income tracts, 40% were in middle-income tracts, and 38% were in upper-income income tracts. Of the 35,032 businesses in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

2020 Census Data

In 2022, a total of 34,619 businesses operated in the assessment area. Of these businesses, 5% were located in low-income census tracts, 19% were in moderate-income tracts, 39% were in middle-income tracts, and 37% were in upper-income tracts. Of the 34,619 businesses in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

Finally, in 2023, a total of 35,291 businesses operated in the assessment area. Of these businesses, 5% were located in low-income census tracts, 19% were in moderate-income tracts, 39% were in middle-income tracts, and 37% were in upper-income tracts. Of the 35,291 businesses in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

The 2018, 2019, 2020, 2021, 2022, and 2023 assessment area demographics used to evaluate American's CRA performance in the assessment area are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	8.9	13,315	6.2	4,633	34.8	44,006	20.5
Moderate-income	34	19.0	36,343	17.0	5,648	15.5	38,780	18.1
Middle-income	78	43.6	89,783	41.8	4,747	5.3	45,189	21.1
Upper-income	51	28.5	74,968	35.0	1,890	2.5	86,434	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	179	100.0	214,409	100.0	16,918	7.9	214,409	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,037	6,742	3.1	26.9	14,409	57.6	3,886	15.5
Moderate-income	66,903	30,801	14.0	46.0	27,624	41.3	8,478	12.7
Middle-income	146,249	97,346	44.1	66.6	36,765	25.1	12,138	8.3
Upper-income	105,787	85,632	38.8	80.9	14,986	14.2	5,169	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	343,976	220,521	100.0	64.1	93,784	27.3	29,671	8.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,115	5.6	1,900	5.5	193	6.6	22	4.7
Moderate-income	5,886	15.6	5,288	15.4	534	18.3	64	13.6
Middle-income	15,618	41.5	14,279	41.6	1,118	38.4	221	47.1
Upper-income	14,052	37.3	12,823	37.5	1,067	36.7	162	34.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	37,671	100.0	34,290	100.0	2,912	100.0	469	100.0
	Percentage of Total Businesses:			91.0		7.7		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.3	2	0.3	0	0.0	0	0.0
Moderate-income	29	4.7	27	4.4	2	18.2	0	0.0
Middle-income	282	45.3	277	45.4	4	36.4	1	100.0
Upper-income	310	49.8	305	49.9	5	45.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	623	100.0	611	100.0	11	100.0	1	100.0
	Percentage of Total Farms:			98.1		1.8		0.2

2015 ACS Data and 2018 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	8.9	13,315	6.2	4,633	34.8	44,006	20.5
Moderate-income	34	19.0	36,343	17.0	5,648	15.5	38,780	18.1
Middle-income	78	43.6	89,783	41.8	4,747	5.3	45,189	21.1
Upper-income	51	28.5	74,968	35.0	1,890	2.5	86,434	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	179	100.0	214,409	100.0	16,918	7.9	214,409	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,037	6,742	3.1	26.9	14,409	57.6	3,886	15.5
Moderate-income	66,903	30,801	14.0	46.0	27,624	41.3	8,478	12.7
Middle-income	146,249	97,346	44.1	66.6	36,765	25.1	12,138	8.3
Upper-income	105,787	85,632	38.8	80.9	14,986	14.2	5,169	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	343,976	220,521	100.0	64.1	93,784	27.3	29,671	8.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,146	5.7	1,935	5.6	190	6.6	21	4.7
Moderate-income	5,946	15.7	5,347	15.5	533	18.5	66	14.7
Middle-income	15,700	41.4	14,388	41.6	1,107	38.5	205	45.8
Upper-income	14,126	37.2	12,923	37.3	1,047	36.4	156	34.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	37,918	100.0	34,593	100.0	2,877	100.0	448	100.0
	Percentage of Total Businesses:			91.2		7.6		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.3	2	0.3	0	0.0	0	0.0
Moderate-income	32	5.0	30	4.7	2	16.7	0	0.0
Middle-income	293	45.4	289	45.7	4	33.3	0	0.0
Upper-income	318	49.3	312	49.3	6	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	645	100.0	633	100.0	12	100.0	0	0.0
	Percentage of Total Farms:			98.1		1.9		0.0

2015 ACS Data and 2019 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	8.9	13,315	6.2	4,633	34.8	44,006	20.5
Moderate-income	34	19.0	36,343	17.0	5,648	15.5	38,780	18.1
Middle-income	78	43.6	89,783	41.8	4,747	5.3	45,189	21.1
Upper-income	51	28.5	74,968	35.0	1,890	2.5	86,434	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	179	100.0	214,409	100.0	16,918	7.9	214,409	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,037	6,742	3.1	26.9	14,409	57.6	3,886	15.5
Moderate-income	66,903	30,801	14.0	46.0	27,624	41.3	8,478	12.7
Middle-income	146,249	97,346	44.1	66.6	36,765	25.1	12,138	8.3
Upper-income	105,787	85,632	38.8	80.9	14,986	14.2	5,169	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	343,976	220,521	100.0	64.1	93,784	27.3	29,671	8.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,016	5.6	1,811	5.5	182	6.6	23	5.4
Moderate-income	5,627	15.7	5,071	15.5	494	18.0	62	14.6
Middle-income	14,663	40.9	13,414	41.1	1,043	38.1	206	48.4
Upper-income	13,533	37.8	12,380	37.9	1,018	37.3	135	31.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35,839	100.0	32,676	100.0	2,737	100.0	426	100.0
	Percentage of Total Businesses:			91.2		7.6		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.3	2	0.3	0	0.0	0	0.0
Moderate-income	31	5.1	29	4.9	2	15.4	0	0.0
Middle-income	282	46.2	277	46.5	5	38.5	0	0.0
Upper-income	295	48.4	288	48.3	6	46.1	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	610	100.0	596	100.0	13	100.0	1	100.0
	Percentage of Total Farms:			97.7		2.1		0.2

2015 ACS Data and 2020 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Demographics 2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	8.9	13,315	6.2	4,633	34.8	44,006	20.5
Moderate-income	34	19.0	36,343	17.0	5,648	15.5	38,780	18.1
Middle-income	78	43.6	89,783	41.8	4,747	5.3	45,189	21.1
Upper-income	51	28.5	74,968	35.0	1,890	2.5	86,434	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	179	100.0	214,409	100.0	16,918	7.9	214,409	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,037	6,742	3.1	26.9	14,409	57.6	3,886	15.5
Moderate-income	66,903	30,801	14.0	46.0	27,624	41.3	8,478	12.7
Middle-income	146,249	97,346	44.1	66.6	36,765	25.1	12,138	8.3
Upper-income	105,787	85,632	38.8	80.9	14,986	14.2	5,169	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	343,976	220,521	100.0	64.1	93,784	27.3	29,671	8.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,011	5.7	1,807	5.7	183	6.8	21	4.8
Moderate-income	5,485	15.7	4,931	15.5	488	18.1	66	15.0
Middle-income	14,178	40.5	12,958	40.6	1,014	37.7	206	46.9
Upper-income	13,358	38.1	12,208	38.2	1,004	37.4	146	33.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35,032	100.0	31,904	100.0	2,689	100.0	439	100.0
	Percentage of Total Businesses:			91.1		7.7		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.3	2	0.4	0	0.0	0	0.0
Moderate-income	31	5.3	28	5.0	3	20.0	0	0.0
Middle-income	262	45.1	257	45.5	5	33.3	0	0.0
Upper-income	286	49.3	278	49.1	7	46.7	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	581	100.0	565	100.0	15	100.0	1	100.0
	Percentage of Total Farms:			97.2		2.6		0.2

2015 ACS Data and 2021 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	15	7.7	12,131	5.6	3,768	31.1	44,629	20.5
Moderate-income	44	22.6	40,646	18.7	5,535	13.6	38,978	17.9
Middle-income	81	41.5	90,552	41.6	4,631	5.1	45,939	21.1
Upper-income	55	28.2	74,571	34.1	1,791	2.4	88,354	40.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	195	100.0	217,900	100.0	15,725	7.2	217,900	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	20,974	5,690	2.5	27.1	12,885	61.4	2,399	11.4
Moderate-income	76,732	35,219	15.8	45.9	34,253	44.6	7,260	9.5
Middle-income	147,670	97,596	43.7	66.1	37,902	25.7	12,172	8.2
Upper-income	105,244	84,963	38.0	80.7	15,731	14.9	4,550	4.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	350,620	223,468	100.0	63.7	100,771	28.7	26,381	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,684	4.9	1,498	4.7	175	6.7	11	2.5
Moderate-income	6,616	19.1	5,985	19.0	540	20.7	91	20.5
Middle-income	13,579	39.2	12,452	39.4	924	35.5	203	45.7
Upper-income	12,740	36.8	11,636	36.9	965	37.1	139	31.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	34,619	100.0	31,571	100.0	2,604	100.0	444	100.0
	Percentage of Total Businesses:			91.2		7.5		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	38	6.6	36	6.5	2	13.3	0	0.0
Middle-income	258	45.1	250	44.9	8	53.3	0	0.0
Upper-income	275	48.1	270	48.4	5	33.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	572	100.0	557	100.0	15	100.0	0	0.0
	Percentage of Total Farms:			97.4		2.6		0.0

2020 Census Data and 2022 Dun & Bradstreet Information

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Assessment Area Demographics 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	15	7.7	12,131	5.6	3,768	31.1	44,629	20.5
Moderate-income	44	22.6	40,646	18.7	5,535	13.6	38,978	17.9
Middle-income	81	41.5	90,552	41.6	4,631	5.1	45,939	21.1
Upper-income	55	28.2	74,571	34.1	1,791	2.4	88,354	40.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	195	100.0	217,900	100.0	15,725	7.2	217,900	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	20,974	5,690	2.5	27.1	12,885	61.4	2,399	11.4
Moderate-income	76,732	35,219	15.8	45.9	34,253	44.6	7,260	9.5
Middle-income	147,670	97,596	43.7	66.1	37,902	25.7	12,172	8.2
Upper-income	105,244	84,963	38.0	80.7	15,731	14.9	4,550	4.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	350,620	223,468	100.0	63.7	100,771	28.7	26,381	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,733	4.9	1,544	4.8	178	6.8	11	2.5
Moderate-income	6,752	19.1	6,120	19.0	543	20.8	89	20.4
Middle-income	13,830	39.2	12,711	39.4	919	35.2	200	45.8
Upper-income	12,976	36.8	11,870	36.8	969	37.2	137	31.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35,291	100.0	32,245	100.0	2,609	100.0	437	100.0
	Percentage of Total Businesses:			91.4		7.4		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	40	6.9	39	6.9	1	6.7	0	0.0
Middle-income	258	44.7	250	44.5	8	53.3	0	0.0
Upper-income	278	48.2	272	48.4	6	40.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	577	100.0	562	100.0	15	100.0	0	0.0
	Percentage of Total Farms:			97.4		2.6		0.0

2020 Census Data and 2023 Dun & Bradstreet Information

SCOPE OF EXAMINATION

The current evaluation of American's CRA performance covers the period from September 24, 2019 through October 7, 2024. While the bank's asset size is below the threshold to be evaluated under the Interagency Large Institution Examination Procedures, American has elected to be evaluated under these examination procedures. As a result, the lending, investment, and service tests were applied to assess the bank's performance under the CRA.

Under the lending test, loan products evaluated include:

- Small business loans reported by the bank, pursuant to the CRA, for calendar years 2019, 2020, 2021, 2022, and 2023⁵;
- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans and loans with purpose "not applicable," collectively titled HMDA loans, reported by the bank for calendar years 2018, 2019, 2020, 2021, 2022, and 2023⁶; and
- Other loans that qualified as community development loans during the entire evaluation period from September 24, 2019 through October 7, 2024.

As mentioned previously, American is primarily a commercial lender, with 67% of its loan portfolio concentrated in commercial real estate and commercial and industrial loans. As such, the bank originated more small business loans, by both number and dollar volume, than HMDA loans. In total, within the bank's assessment area, the bank originated 1,148 small business loans totaling \$220 million, and 656 HMDA loans totaling \$185 million. A significant portion of the bank's small business lending was conducted pursuant to the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP), which was a temporary lending facility offered from April 3, 2020 to May 31, 2021⁷.

⁵ 2018 small business loans were reviewed during the 2019 CRA Evaluation, as such, it is not included in the current review.

⁶ In October 2015 and August 2017, the Consumer Financial Protection Bureau (CFPB) issued final rules amending Regulation C effective January 1, 2018. Among other changes, the final rules modified:

(1) the types of institutions subject to Regulation C (covered institutions); (2) the types of transactions subject to Regulation C (covered transactions); (3) the types of data institutions are required to collect, record, and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data. See [80 Fed. Reg. 66127](#) (Oct. 28, 2015) (final rule); and [82 Fed. Reg. 43088](#) (Sept. 13, 2017) (correction). In response to the amendments, the Board of Governors, along with the other federal agencies that implement the CRA, amended their regulations to conform to the Regulation C amendments. Of note, the definition of "home-mortgage loan" in Regulation BB was revised to mean a "closed-end mortgage loan" or an "open-end line of credit," as those terms are defined in, and not excluded transactions under, amended Regulation C. As a result, home improvement loans not secured by a dwelling, which were previously reportable under Regulation C, are no longer reported; home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the HMDA reporter, are now covered transaction under HMDA that must be reported if the institution originates 200 or more of them in each of the two preceding calendar years. Finally, "home equity loan" was deleted from the CRA definition of "consumer loan" because home equity loans are now included within the CRA definition of "home-mortgage loan."

⁷ Established as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the PPP directed hundreds of billions of dollars to small businesses and other organizations adversely affected by the COVID-19 crisis, providing resources to maintain payrolls and to cover business overhead. This program, which offered low-interest uncollateralized loans to small businesses, was available from April 3, 2020 through May 31, 2021.

A significant portion of the bank's loans to small businesses did not contain revenue information, as permitted under CARES Act reporting requirements. For CRA evaluation purposes, small business lending was weighted more heavily than HMDA lending.

American's small business and HMDA loans were compared to the aggregate of all lenders in the bank's assessment area that report small business loans pursuant to CRA, and home-mortgage loans pursuant to HMDA. These data are reported annually.

Examiners also analyzed the demographic characteristics of the assessment area as one way to measure loan demand. Demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, demographic data provides context for the bank's performance in the assessment area where it operates.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of 2015 ACS data for loans made in 2018, 2019, 2020, and 2021, and 2020 Census data for loans made in 2022 and 2023. The distribution of HMDA loans to borrowers of different income levels was based upon annually-adjusted median family income data for each of those years, made available by the FFIEC. All other demographic indices and statistics presented throughout this evaluation are based on 2015 ACS data in 2018, 2019, 2020, and 2021, and 2020 Census data in 2022 and 2023, unless otherwise noted.

For small business loans, examiners used Dun & Bradstreet data for comparison purposes for the applicable years. Dun & Bradstreet collects and publishes this self-reported data detailing the revenues and locations of local businesses.

American's community development loans, qualified investments, and community development services for the entire evaluation period were reviewed to assess the bank's performance under the community development portions of the lending, investment, and service tests.

Finally, as detailed previously, to supplement economic, demographic and performance data, examiners also interviewed two community representatives in the assessment area.

A full-scope review of the Allentown, PA MSA was conducted, as the bank operates its single full-service branch in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Performance under the lending test is rated high satisfactory. The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Concentration of lending within the assessment area, including small business and HMDA lending;

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of different sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Overall, the bank's lending activity demonstrates adequate responsiveness to the credit needs of its assessment area. As stated earlier, the bank's assessment area includes Lehigh, Northampton, and Carbon Counties, PA, and Warren County, NJ. During the evaluation period, lending activities have been predominately in Lehigh and Northampton Counties, as the bank's single branch is located in Lehigh County. However, there have been very little lending activities in both Carbon County, PA and Warren County, NJ.

As indicated earlier, as of June 30, 2024, American reported \$920 million in total assets, of which \$764 million, or 83% were loans. At the previous evaluation conducted as of September 23, 2019, total loans measured \$518 million, and represented 81% of total assets using June 30, 2019 Call Report data.

The bank's loan-to-deposit ratio averaged 101.7% over the 20-quarter period ending June 30, 2024, while the peer group averaged 75% over the same time frame. This shows that the bank's lending compared to deposits exceeded that of its peer institutions around the country. Although the overall lending activity within the assessment area is good, given the fact that the bank does not meet the credit needs in Carbon County, PA and Warren County, NJ the lending activity is considered adequate.

The table below depicts the bank's HMDA and CRA lending activity during the evaluation period.

American Bank Summary of Lending Activity ⁸				
Loan Types	#	%	\$ (000s)	%
Home Purchase – Conventional	317	13.6	89,557	15.9
Home Purchase – FHA	2	< 0.1	602	0.1
Home Improvement	51	2.2	3,714	0.7
Multifamily Housing	92	4.0	85,417	15.1
Other Purpose Closed-End	22	0.9	1,128	0.2
Refinancing	349	15.0	73,375	13.0
Total HMDA related	833	35.7	253,793	45.0
Small Business	1498	64.3	310,479	55.0
Total Small Business related	1498	64.3	310,479	55.0
TOTAL LOANS	2,331	100.0	564,272	100.0

⁸ The Summary of Lending Activity report was updated to include the PPP loans from 2020 and 2021 as small business loans.

Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank's assessment area. The analysis consisted of an evaluation of American's small business and HMDA loans. The assessment area concentration analysis indicated that an adequate percentage of loans were made in the bank's assessment area.

More specifically, during the evaluation period, American made 77% of its small business loans by number, and 71% by dollar amount of loans in the bank's assessment area. This level of small business lending represents a decrease from the previous evaluation, when 81% of the number of small business loans, and 73% by dollar amount were extended inside the assessment area.

With respect to HMDA loans, 79% of HMDA loans by number, and 73% by dollar amount were extended in the bank's assessment area. This represents a decrease in number of HMDA loans, and a slight increase by dollar amount from the previous evaluation, when 83% of the total number of HMDA loans, and 71% by dollar amount were extended inside the assessment area.

Overall, 77% of all loans by number, and 72% of loans by dollar volume, were made within the assessment area during the evaluation period. At the previous evaluation, 82% of loans by number, and 72% of loans by dollar volume were made within the assessment area.

The table below shows the distribution of lending inside and outside the bank's assessment area.

American Bank Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Improvement	42	82.4	3,196	86.1	9	17.6	518	13.9
Home Purchase – Conventional	232	73.2	62,127	69.4	85	26.8	27,430	30.6
Home Purchase – FHA	2	100.0	602	100.0	0	0.0	0	0.0
Multifamily Housing	65	70.7	60,305	70.6	27	29.3	25,112	29.4
Other Purpose Closed-End	22	100.0	1,128	100.0	0	0.0	0	0.0
Refinancing	293	84.0	57,260	78.0	56	16.0	16,115	22.0
Total HMDA related	656	78.8	\$184,618	72.7	177	21.2	69,175	27.3
Small Business	1,148	76.6	220,332	71.0	350	23.4	90,147	29.0
Total Small Business related	1,148	76.6	\$220,332	71.0	350	23.4	90,147	29.0
TOTAL LOANS	1,804	77.4	\$404,950	71.8	527	22.6	\$159,322	28.2

Borrower Distribution of Lending⁹

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, adequate penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

⁹The information used to evaluate lending activity by American is detailed in the Loan Distribution Tables contained in the Appendices.

It is noted that borrower and geographic distribution analyses were given the same weight in determining the lending test performance. Further, as indicated previously, small business lending was provided greater weight in determining the bank's borrower distribution of loans, followed by HMDA loans.

Small Business Lending

An analysis of American's distribution of loans to businesses reflects good penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of \$1 million or less, namely, small businesses.

The number of businesses operating in the Allentown, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to Dun & Bradstreet data, there were 37,918 businesses operating in the assessment area in 2019, 34,593 (91%) of which were designated as small businesses reporting revenues of less than \$1 million. In 2020, 35,839 businesses were operating in the assessment area, 91% of which (32,676) were designated as small businesses. In 2021, there were 35,032 businesses operating in the assessment area, of which 91% (31,904) were designated as small businesses. In 2022, there were 34,619 businesses, of which 91% (31,571) were designated as small businesses. Finally, in 2023, 35,291 businesses were operating in the assessment area, of which 91% (32,245) were designated as small businesses.

2015 ACS Data

In 2019, American's small business borrower distribution was good. The bank originated 104 small business loans aggregating nearly \$24 million within the assessment area. Of these loans, 54% were originated to small businesses (56 loans). This performance was above the aggregate lending level of 48% to small businesses, but below the proxy of 91%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus, added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2019, 41% of small business loans were extended in amount of \$100 thousand or less, compared with 94% of loans made by aggregate lenders.

In 2020, the bank's borrower distribution of small business loans was good, considering performance context factors. In 2020, the bank originated 489 small business loans aggregating nearly \$86 million within the assessment area. Of these loans, 11% (55 loans) were originated to small businesses. Notably, 82% of the bank's small business loan originations (400 loans) were to businesses with unknown revenues. This is attributed to the bank's participation in the SBA's PPP¹⁰.

¹⁰ In April 2020, the PPP was established by the CARES Act and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP provided small businesses with funds to pay up to eight weeks of payroll costs, including benefits. Funds could also be used to pay interest on mortgages, rents and utilities.

Under this program, institutions were not required to collect revenue information. The COVID-19 pandemic was an unprecedented global event that impacted businesses of all sizes, most notably smaller businesses that typically do not have an excess of capital to weather long periods of closure and slashed revenue. American's participation in this program is considered in the evaluation of its borrower distribution of lending.

When only considering the bank's loans where revenues were reported as \$1 million or less, the bank's performance (11%) was below the aggregate lending of 42% to small businesses, and the proxy of 91%. However, when considering the bank's PPP lending, which is reasonably inferred to be supportive of small businesses in need of capital, the bank's performance is considered to be good.

In 2020, 57% of American's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 87% of small business loans made in the assessment area were originated in amount of \$100 thousand or less.

In 2021, the bank's borrower distribution of small business loans was good, considering performance context. In 2021, American originated 377 small business loans within the assessment area, aggregating nearly \$61 million. Of these loans, 14% were originated to small businesses (52 loans). As noted above, American's participation in the PPP significantly impacted the bank's small business loan data. Seventy-three percent of the bank's small business loan originations (274 loans) were to businesses with unknown revenues, and it is reasonably inferred that these originations were to benefit small businesses impacted by the COVID-19 pandemic.

When only considering the bank's loan where revenues were reported as \$1 million or less, the bank's performance (14%) was below the aggregate lending of 49% to small businesses, and the proxy of 91%. However, when considering the bank's PPP lending, the bank's performance was good.

In 2021, 57% of American's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

2020 Census Data

In 2022, the bank's borrower distribution of small business loans was good. In 2022, American originated 108 small business loans within the assessment area, aggregating nearly \$30 million. Of these loans, 54% were originated to small businesses (58 loans). The bank's lending to small business was comparable to the aggregate lending level of 55%, and was below the proxy of 91% small businesses in the assessment area.

In 2022, 24% of American's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 95% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Finally, in 2023, the bank's borrower distribution of small business loans was poor. In 2023, American originated 70 small business loans within the assessment area, aggregating almost \$21 million. Of these loans, 37% were originated to small businesses (26 loans). The bank's lending to small business was below the aggregate lending level of 58% to small businesses, and was below the proxy of 91% small businesses in the assessment area.

In 2023, 29% of American's small business loans were extended in amounts of \$100 thousand or less. Aggregate data indicates that 95% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Home-Mortgage Lending

American's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is poor.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in the assessment area, the greater the demand for credit is among the low- and moderate-income individuals and families within the assessment area.

As noted previously, according to the 2015 ACS data, 21% of assessment area families were low-income, 18% were moderate-income, 21% were middle-income, and 40% were upper-income. Thirty-nine percent of families using 2015 ACS data, were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

According to the 2020 Census data, 20% of assessment area families were low-income, 18% were moderate-income, 21% were middle-income, and 41% were upper-income. Thirty-eight percent of families, using the 2020 Census data, were designated as low- or moderate-income families.

The following tables compare American's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The tables used to evaluate lending in 2018, 2019, 2020, and 2021 rely on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data. The table used to evaluate lending in 2022 and 2023 relies on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data.

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level					
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison			
		2018		2019	
		% American Lending	% Aggregate Lending	% American Lending	% Aggregate Lending
Low	20.5	0.0	8.1	6.4	8.3
Moderate	18.1	10.3	18.9	10.0	19.7
Middle	21.1	12.8	22.4	12.7	21.8
Upper	40.3	41.0	33.9	45.5	33.9
Unknown	0.0	35.9	16.7	25.4	16.3
Total	100.0	100.0	100.0	100.0	100.0

American Bank Allentown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level					
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison			
		2020		2021	
		% American Lending	% Aggregate Lending	% American Lending	% Aggregate Lending
Low	20.5	7.6	5.8	2.8	7.1
Moderate	18.1	9.7	16.2	12.4	18.1
Middle	21.1	17.4	20.9	20.7	22.2
Upper	40.3	52.1	39.0	46.9	35.4
Unknown	0.0	13.2	18.1	17.2	17.2
Total	100.0	100.0	100.0	100.0	100.0

American Bank Allentown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level					
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison			
		2022		2023	
		% American Lending	% Aggregate Lending	% American Lending	% Aggregate Lending
Low	20.5	8.9	8.9	4.5	7.0
Moderate	17.9	8.9	20.7	6.7	19.5
Middle	21.1	18.9	22.2	7.9	22.9
Upper	40.5	34.4	33.0	53.9	34.4
Unknown	0.0	28.9	15.2	27.0	16.2
Total	100.0	100.0	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, American's lending to low-income borrowers was poor.

2015 ACS Data

American's lending in 2018 to low-income borrowers was very poor. In 2018, American did not originate any of its 78 HMDA-reportable loans to low-income borrowers. This performance was far

below the proxy of 21%, and trailed behind aggregate lenders, who made 8% of HMDA loans to low-income borrowers in 2018. By loan category, aggregate lenders made 8% of home purchase loans, 9% of refinance loans, 7% of home improvement loans, less than 1% of multifamily loans, 9% of other purpose lines of credit, 10% of other purpose closed/exempt loans, and less than 1% of loans with purpose of “not applicable” to low-income borrowers in 2018.

American’s lending in 2019 to low-income borrowers was poor. In total, 6% of the bank’s 110 HMDA loans (seven loans) were originated to low-income borrowers, falling below the proxy of 21%, and the aggregate lending of 8%. By loan category, American originated 3% of its home purchase loans, 7% of refinance loans, 14% of home improvement loans, 25% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose of “not applicable” to low-income borrowers. In comparison, aggregate lenders made close to 10% of home purchase loans, 7% of refinance loans, 8% of home improvement loans, less than 1% of multifamily loans, 9% of other purpose lines of credit, 10% of other purpose closed/exempt loans, and less than 1% of loans with purpose of “not applicable” to low-income borrowers in 2019.

American’s lending in 2020 to low-income borrowers was adequate. In total, nearly 8% of the bank’s 144 HMDA loans (11 loans) were originated to low-income borrowers, falling below the proxy of 21% and slightly above aggregate lenders, who made 6% of HMDA loans to low-income borrowers in 2020. By loan category, American originated 14% of home purchase loans, 4% of refinance loans, 100% of home improvement loans, and no multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of “not applicable” in 2020. In comparison, aggregate lenders made 9% of home purchase loans, nearly 4% of refinance loans, 5% of home improvement loans, no multifamily loans, 7% of other purpose lines of credit, 7% of other purpose closed/exempt loans, and less than 1% of loans with purpose of “not applicable” to low-income borrowers in 2020.

American’s lending in 2021 to low-income borrowers was poor. In total, 3% of the bank’s 145 HMDA loans (four loans) were originated to low-income borrowers, falling far below the proxy of 21% and below the aggregate lending of 7%. By loan category, American originated 2% of home purchase loans, nearly 4% of refinance loans, and no home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of “not applicable” in 2021. In comparison, aggregate lenders originated nearly 10% of home purchase loans, close to 6% of refinance loans, nearly 8% of home improvement loans, no multifamily loans, 7% of other purpose lines of credit, 8% of other purpose closed/exempt loans, and less than 1% of loans with purpose of “not applicable” to low-income borrowers in 2021.

2020 Census Data

American’s lending in 2022 to low-income borrowers was adequate. In total, 9% of the bank’s 90 HMDA loans (eight loans) were originated to low-income borrowers, falling far below the proxy of 20% and matching the aggregate lending of 9%.

By loan category, American originated nearly 11% of home purchase loans, 10% of refinance loans, 9% of home improvement loans, and no multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of “not applicable” in 2021. In comparison,

aggregate lenders originated 8% of home purchase loans, 11% of refinance loans, nearly 7% of home improvement loans, less than 1% of multifamily loans, 7% of other purpose lines of credit, 9% of other purpose closed/exempt loans, and less than 1% of loans with purpose “not applicable” to low-income borrowers in 2022.

American’s lending in 2023 to low-income borrowers was poor. In total, close to 5% of the bank’s 89 HMDA loans (four loans) were originated to low-income borrowers, falling far below the proxy of 20%, and below the aggregate lenders of 7%. By loan category, American originated nearly 6% of home purchase loans, 10% of home improvement loans, and no refinance loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of “not applicable” in 2023. In comparison, aggregate lenders made 6% of home purchase loans, 10% of refinance loans, 7% of home improvement loans, no multifamily loans, 6% of other purpose lines of credit, 10% of other purpose closed/exempt, and 3% of loans with purpose of “not applicable” to low-income borrowers in 2023.

Although American’s lending to low-income borrowers was poor during the evaluation period, this performance must be considered within the bank’s overall performance context. Considerations such as median family incomes and housing costs, and challenges faced by low-income borrowers in saving for a down payment and closing costs, present significant obstacles to homeownership, thereby limiting lending opportunities. As previously stated, nearly 50% of renters using 2015 ACS data, and 47% of renters using 2020 Census data, spent more than 30% of their income on rent, which makes it difficult to save the customary down payment and closing costs necessary to purchase a home. Furthermore, American is primarily a commercial lender, is not a significant mortgage lender in the assessment area, and operates in a highly competitive market.

Lending to Moderate-Income Borrowers

For the period under review, the bank’s lending to moderate-income borrowers was poor.

2015 ACS Data

American’s lending in 2018 to moderate-income borrowers was poor. In total, 10% of the bank’s 78 HMDA loans (eight loans) were originated to moderate-income borrowers, falling below the proxy of 18%, and aggregate lending of 19%. By loan category, American originated 10% of home purchase loans, nearly 13% of refinance loans, 25% of other purpose closed/exempt loans, and no home improvement loans, multifamily loans, other purpose lines of credit, or loans with purpose of “not applicable” in 2018. In comparison, aggregate lenders made close to 21% of home purchase loans, 18% of refinance loans, 16% of home improvement loans, less than 1% of multifamily loans, nearly 19% of other purpose lines of credit, almost 20% of other purpose closed/exempt loans, and 2% of loans with purpose of “not applicable” to moderate-income borrowers in 2018.

American’s lending in 2019 to moderate-income borrowers was poor. In total, 10% of the bank’s 110 HMDA loans (11 loans) were originated to moderate-income borrowers, falling below the proxy of 18%, and the aggregate lending of 20%. By loan category, American originated nearly 10% of home purchase loans, almost 12% of refinance loans, 14% of home improvement loans, and no multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with

purpose of “not applicable” in 2019. In comparison, aggregate lenders made 24% of home purchase loans, nearly 16% of refinance loans, 16% of home improvement loans, less than 1% of multifamily loans, 17% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and less than 1% of loans with purpose of “not applicable” to moderate-income borrowers in 2019.

American’s lending in 2020 to moderate-income borrowers was poor. In total, 10% of the bank’s 144 HMDA loans (14 loans) were originated to moderate-income borrowers, falling below the proxy of 18%, and aggregate lending of 16%. By loan category, American generated nearly 6% of home purchase loans, nearly 12% of refinance loans, 10% of multifamily loans, and no home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of “not applicable” in 2020. In comparison, aggregate lenders made 23% of home purchase loans, 12% of refinance loans, 16% of home improvement loans, less than 1% of multifamily loans, nearly 17% of other purpose lines of credit, almost 18% of other purpose closed/exempt loans, and less than 1% of loans with purpose of “not applicable” to moderate-income borrowers in 2020.

American’s lending in 2021 to moderate-income borrowers was poor. In total, 12% of the bank’s 145 HMDA loans (18 loans) were originated to moderate-income borrowers, falling below the proxy and aggregate lending, both of which were 18%. By loan category, American originated 18% of home purchase loans, 12% of refinance loans, and no home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of “not applicable” in 2021. In comparison, aggregate lenders made 22% of home purchase loans, 16% of refinance loans, 14% of home improvement loans, no multifamily loans, almost 19% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and no loans with purpose of “not applicable” to moderate-income borrowers in 2021.

2020 Census Data

American’s HMDA lending in 2022 to moderate-income borrowers was poor. In total, 9% of the bank’s 90 HMDA loans (eight loans) were originated to moderate-income borrowers, falling far below the proxy of 18%, and aggregate lending of 21%. By loan category, American originated 8% of home purchase loans, 13% of refinance loans, 100% of other purpose closed/exempt loans, and no home improvement loans, multifamily loans, other purpose lines of credit, or loans with purpose of “not applicable” in 2022. In comparison, aggregate lenders made 21% of home purchase loans, nearly 23% of refinance loans, 18% of home improvement loans, less than 1% of multifamily loans, 18% of other purpose lines of credit, 20% of other purpose closed/exempt loans, and less than 1% of loans with purpose of “not applicable” to moderate-income borrowers in 2022.

Finally, American’s lending in 2023 to moderate-income borrowers was poor. In total, 7% of the bank’s 89 HMDA loans (six loans) were originated to moderate-income borrowers, falling far below the proxy of 18%, and aggregate lending of 20%.

By loan category, American originated nearly 4% of home purchase loans, 15% of refinance loans, 20% of home improvement loans, and no multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of “not applicable” to moderate-income borrowers in 2023. In comparison, aggregate lenders made 19% of home purchase loans, nearly 23% of refinance loans, 19% of home improvement loans, 22% of other purpose lines of credit, nearly

19% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose of “not applicable” to moderate-income borrowers in 2023.

Geographic Distribution of Lending¹¹

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects good penetration throughout the assessment area, including low- and moderate-income tracts. As indicated previously, geographic and borrower distribution analyses were provided the same amount of weight in determining the overall lending test performance. Further, as with borrower distribution analysis, small business lending was given greater weight in determining the geographic distribution conclusion, due to the higher volume of these loans, followed by HMDA loans.

Small Business Lending

The geographic distribution of American’s small business loans reflects good penetration throughout the assessment area, in the context of the assessment area’s demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. Based on 2019 Dun & Bradstreet data, there were 37,918 businesses operating in the bank’s assessment area. Of these businesses, 6% were located in low-income tracts, and 16% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (41% and 37%, respectively). In 2020, the total number of businesses decreased to 35,839. Of these businesses, 6% were located in low-income census tracts, and 16% were in moderate-income tracts. Again, the majority of the businesses were located in middle- and upper-income tracts (40% and 38%, respectively). In 2021, there were 35,032 businesses operating in the assessment area, and there was no change from the previous year in the distribution of businesses by tracts. In 2022, there were 34,619 businesses operating in the assessment area. Of these businesses, 5% were located in low-income census tracts, and 19% were in moderate-income tracts. Once again, the majority of businesses were located in middle- and upper-income tracts (39% and 37%, respectively). Finally, in 2023, there were 35,291 businesses operating in the assessment area, and there was no change from the previous year in the distribution of businesses by income tracts.

¹¹The information used to evaluate lending activity by American is detailed in the Loan Distribution Tables contained in the Appendices.

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

The tables below present American’s small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

American Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2019 Dun & Bradstreet Data)	Aggregate Comparison	
		2019	
		% American Lending	% Aggregate Lending
Low	5.7	3.8	5.0
Moderate	15.7	10.6	15.1
Middle	41.3	38.5	38.9
Upper	37.3	47.1	39.7
Unknown	0.0	0.0	1.3
Total	100.0	100.0	100.0

American Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Dun & Bradstreet Data)	Aggregate Comparison	
		2020	
		% American Lending	% Aggregate Lending
Low	5.6	8.2	5.0
Moderate	15.7	12.5	15.2
Middle	40.9	33.9	39.9
Upper	37.8	45.4	39.4
Unknown	0.0	0.0	0.5
Total	100.0	100.0	100.0

American Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2021 Dun & Bradstreet Data)	Aggregate Comparison	
		2021	
		% American Lending	% Aggregate Lending
Low	5.7	5.6	5.0
Moderate	15.7	11.9	15.9
Middle	40.5	36.6	39.5
Upper	38.1	45.9	39.0
Unknown	0.0	0.0	0.6
Total	100.0	100.0	100.0

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2022 Dun & Bradstreet Data)	Aggregate Comparison	
		2022	
		% American Lending	% Aggregate Lending
Low	4.9	0.0	4.6
Moderate	19.1	13.9	18.8
Middle	39.2	42.6	38.0
Upper	36.8	43.5	38.1
Unknown	0.0	0.0	0.5
Total	100.0	100.0	100.0

American Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2023 Dun & Bradstreet Data)	Aggregate Comparison	
		2023	
		% American Lending	% Aggregate Lending
Low	4.9	2.9	4.6
Moderate	19.1	20.0	18.6
Middle	39.2	40.0	38.1
Upper	36.8	37.1	38.3
Unknown	0.0	0.0	0.4
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

American's small business lending in low-income tracts was good.

2015 ACS Data

In 2019, the geographic distribution of the bank's small business lending in low-income census was adequate. American originated 4% of its 104 small business loans (four loans) in the assessment area's low-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 6%, and the 2019 aggregate small business lending level of 5%.

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was excellent. American originated 8% of its 489 small business loans (40 loans) in the assessment area's low-income census tracts. The bank's lending exceeded both the applicable business loan demand proxy of 6%, and the aggregate small business lending level of 5%.

In 2021, the geographic distribution of the bank's small business lending in low-income census tracts was excellent. American originated 6% of its 377 small business loans (21 loans) in the assessment area's low-income tracts. The bank's lending matched the applicable business loan demand proxy of 6%, and exceeded the aggregate small business lending level of 5%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in low-income census tracts was very poor. American did not originate any of its 108 small business loans in low-income tracts. The bank's lending was far below the applicable business loan demand proxy and aggregate small business lending level, both of which were 5%.

In 2023, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. American originated 3% of its 70 small business loans (two loans) in low-income tracts. The bank's lending was below both the applicable business loan demand proxy, and aggregate small business lending level, both of which were 5%.

Lending in Moderate-Income Census Tracts

American's lending to moderate-income census tracts was adequate.

2015 ACS Data

In 2019, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. American originated 11% of its 104 small business loans (11 loans) in moderate-income tracts. The bank's lending level was below both the applicable business loan demand proxy of 16%, and the 2019 aggregate small business lending of 15%.

In 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. American originated 13% of its 489 small business loans (61 loans) in moderate-income tracts. The bank's lending level was below both the applicable business loan demand proxy of 16%, and the 2020 aggregate small business lending of 15%.

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. American originated 12% of its 377 small business loans (45 loans) in moderate-income tracts. The bank's lending level was below both the applicable business loan demand proxy of 16%, and the 2021 aggregate small business lending of 16%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. American originated 14% of its 108 small business loans (15 loans) in moderate-income tracts. The bank's lending level was below both the applicable business loan demand proxy of 19%, and the 2022 aggregate small business lending of 19%.

In 2023, the geographic distribution of the bank's small business lending in moderate-income census tracts was excellent. American originated 20% of its 70 small business loans (14 loans) in moderate-income tracts. The bank's lending level just exceeded both the applicable business loan demand proxy, and 2023 aggregate small business lending, both of which were 19%.

Home-Mortgage Lending

American's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is good, taking into consideration the bank's business strategy and the demographics and economic characteristics of the assessment area. It is noted that the bank is primarily a commercial lender, and that there is significant competition in the assessment area.

As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, only 3% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 14% was located in moderate-income tracts. The majority of owner-occupied housing was located in the middle- and upper-income tracts (44% and 39%, respectively).

According to 2020 Census data, close to 3% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and about 16% was located in moderate-income tracts. Once again, the majority of owner-occupied housing was located in middle- and upper-income tracts (44% and 38%, respectively).

The following tables present American's geographic distribution of HMDA loans in 2018, 2019, 2020, 2021, 2022, and 2023, in comparison to the applicable owner-occupied housing proxies, and the aggregate lending levels in the assessment area. The tables rely on 2015 ACS data for 2018, 2019, 2020, and 2021, and 2020 Census data for 2022 and 2023, along with updated HMDA data.

American Bank Allentown, PA Assessment Area Geographic Distribution of HMDA Loans					
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison			
		2018		2019	
		% American Lending	% Aggregate Lending	% American Lending	% Aggregate Lending
Low	3.1	12.8	3.8	4.5	3.8
Moderate	14.0	12.8	15.8	10.0	15.1
Middle	44.1	32.1	42.6	37.3	41.6
Upper	38.8	42.3	37.8	48.2	39.5
Unknown	0.0	0.0	0.0	0.0	0.0
Total	100.0	100.0	100.0	100.0	100.0

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Geographic Distribution of HMDA Loans					
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison			
		2020		2021	
		% American Lending	% Aggregate Lending	% American Lending	% Aggregate Lending
Low	3.1	4.9	3.0	1.4	3.1
Moderate	14.0	8.3	12.8	9.7	14.7
Middle	44.1	33.3	40.6	37.9	41.2
Upper	38.8	53.5	43.6	51.0	41.0
Unknown	0.0	0.0	0.0	0.0	0.0
Total	100.0	100.0	100.0	100.0	100.0

American Bank Allentown, PA Assessment Area Geographic Distribution of HMDA Loans					
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison			
		2022		2023	
		% American Lending	% Aggregate Lending	% American Lending	% Aggregate Lending
Low	2.5	1.1	4.2	3.4	4.1
Moderate	15.8	21.1	18.1	18.0	17.8
Middle	43.7	42.2	42.2	47.2	42.6
Upper	38.0	35.6	35.5	31.4	35.5
Unknown	0.0	0.0	0.0	0.0	0.0
Total	100.0	100.0	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, American’s overall HMDA lending in low-income tracts was good.

2015 ACS Data

American’s lending in low-income census tracts in 2018 was excellent. Of the bank’s 78 HMDA loans in 2018, American originated 13% (10 loans) in low-income tracts, which far exceeded the proxy of 3% and the aggregate lending of 4%. By loan category, American originated 17% of home purchase loans, 43% of multifamily loans, and no refinance loans, home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose “not applicable” in 2018. In comparison, aggregate lenders made 4% of home purchase loans, nearly 3% of refinance loans, nearly 2% of home improvement loans, 31% of multifamily loans, 2% of other purpose lines of credit, almost 4% of other purpose closed/exempt loans, and 6% of loans with purpose “not applicable” in low-income tracts.

American’s lending in low-income census tracts in 2019 was good. Of the bank’s 110 HMDA loans in 2019, American originated 5% (five loans) in low-income tracts, which exceeded the proxy of 3%, and aggregate lending of 4%.

By loan category, American originated 3% of home purchase loans, 3% of refinance loans, 25% of multifamily loans, and no home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose “not applicable” in 2019. In comparison, aggregate lenders made nearly 5% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 23% of multifamily loans, 1% of other purpose lines of credit, 3% of other purpose closed/exempt loans, and nearly 10% of loans with purpose “not applicable” in low-income tracts.

American’s lending in low-income census tracts in 2020 was excellent. Of the bank’s 144 HMDA loans in 2020, American originated 5% (seven loans) in low-income tracts, which exceeded the proxy and the aggregate lending levels, both of which were 3%. By loan category, American originated nearly 6% of home purchase loans, 1% of refinance loans, 40% of multifamily loans, and no home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose “not applicable” in 2020. In comparison, aggregate lenders made nearly 5% of home purchase loans, nearly 2% of refinance loans, 1% of home improvement loans, 27% of multifamily loans, less than 1% of other purpose lines of credit, 2% of other purpose closed/exempt loans, and nearly 6% of loans with purpose “not applicable” in low-income tracts.

American’s lending in low-income census tracts in 2021 was poor. Of the bank’s 145 HMDA loans in 2021, American originated 1% (two loans) in low-income tracts, which was below the proxy and the aggregate lending levels, both of which were 3%. By loan category, American originated 14% of home improvement loans, nearly 13% of multifamily loans, and no home purchase loans, refinance loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose “not applicable” in 2021. In comparison, aggregate lenders made 5% of home purchase loans, nearly 2% of refinance loans, 2% of home improvement loans, 26% of multifamily loans, 2% of other purpose lines of credit, 4% of other purpose closed/exempt loans, and 6% of loans with purpose “not applicable” in low-income tracts.

2020 Census Data

American’s lending in low-income census tracts in 2022 was poor. Of the bank’s 90 HMDA loans in 2022, American originated 1% (one loan) in a low-income tract, which was below the proxy of 3%, and aggregate lending of 4%. By loan category, American originated nearly 3% of home purchase loans, and no refinance loans, home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose “not applicable” in 2022. In comparison, aggregate lenders made 5% of home purchase loans, nearly 4% of refinance loans, 2% of home improvement loans, 16% of multifamily loans, 2% of other purpose lines of credit, 3% of other purpose closed/exempt loans, and 5% of loans with purpose “not applicable” in low-income tracts.

American’s lending in low-income census tracts in 2023 was adequate. Of the bank’s 89 HMDA loans in 2023, American originated 3% (three loans) in low-income tracts, which matched the proxy of 3%, and was below the aggregate lending of 4%. By loan category, American originated nearly 4% of home purchase loans, 14% of multifamily loans, and no refinance loans, home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose “not applicable” in 2023. In comparison, aggregate lenders made 5% of home purchase loans, 4% of refinance loans, 2% of home improvement loans, 20% of multifamily loans, 1% of other purpose lines of credit, 3% of other purpose closed/exempt loans, and nearly 6% of loans with purpose “not applicable” in low-income tracts.

Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was good.

2015 ACS Data

American's lending in moderate-income census tracts in 2018 was good. Of the bank's 78 HMDA loans in 2018, American originated 13% (10 loans) in moderate-income tracts, which was slightly below the proxy of 14%, and below the aggregate lending of 16%. By loan category, American originated nearly 15% of home purchase loans, 6% of refinance loans, nearly 29% of multifamily loans, 13% of other purpose closed/exempt loans, and no home improvement loans, other purpose lines of credit, or loans with purpose "not applicable" in 2018. In comparison, aggregate lenders made nearly 18% of home purchase loans, nearly 13% of refinance loans, 10% of home improvement loans, 20% of multifamily loans, 10% of other purpose lines of credit, 12% of other purpose closed/exempt loans, and nearly 24% of loans with purpose "not applicable" in moderate-income tracts.

American's lending in moderate-income census tracts in 2019 was adequate. Of the bank's 110 HMDA loans in 2019, American originated 10% (11 loans) in moderate-income tracts, which was below the proxy of 14%, and the aggregate lending of 15%. By loan category, American originated 16% of home purchase loans, 8% of refinance loans, nearly 13% of multifamily loans, and no home improvement loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in 2019. In comparison, aggregate lenders made 18% of home purchase loans, almost 11% of refinance loans, 10% of home improvement loans, 26% of multifamily loans, 10% of other purpose lines of credit, 13% of other purpose closed/exempt loans, and 26% of loans with purpose "not applicable" in moderate-income tracts.

American's lending in moderate-income census tracts in 2020 was poor. Of the bank's 144 HMDA loans, American originated 8% (12 loans) in moderate-income tracts, which was below the proxy of 14%, and aggregate lending of 13%. By loan category, American originated nearly 9% of home purchase loans, 5% of refinance loans, 50% of home improvement loans, 30% of multifamily loans, and no other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in 2020. In comparison, aggregate lenders made 18% of home purchase loans, 8% of refinance loans, 10% of home improvement loans, 34% of multifamily loans, 8% of other purpose lines of credit, 11% of other purpose closed/exempt loans, and 24% of loans with purpose "not applicable" in moderate-income tracts.

American's lending in moderate-income census tracts in 2021 was adequate. Of the bank's 145 HMDA loans, American originated 10% (14 loans) in moderate-income tracts, which was below the proxy of 14%, and the aggregate lending level of 15%. By loan category, American originated 16% of home purchase loans, 6% of refinance loans, nearly 13% of multifamily loans, 25% of other purpose closed/exempt loans, and no home improvement loans, other purpose lines of credit, or loans with purpose "not applicable" in 2021. In comparison, aggregate lenders made 20% of home purchase loans, 11% of refinance loans, 11% of home improvement loans, 34% of multifamily loans, 10% of other purpose lines of credit, 12% of other purpose closed/exempt loans, and 28% of loans with purpose "not applicable" in moderate-income tracts.

2020 Census Data

American's lending in moderate-income census tracts in 2022 was excellent. Of the bank's 90 HMDA loans, American originated 21% (19 loans) in moderate-income tracts, which exceeded the proxy of 16%, and the aggregate lending level of 18%. By loan category, American originated 24% of home purchase loans, 16% of refinance loans, 9% of home improvement loans, 44% of multifamily loans, and no other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in 2022. In comparison, aggregate lenders made nearly 20% of home purchase loans, 18% of refinance loans, 13% of home improvement loans, 42% of multifamily loans, 10% of other purpose lines of credit, 16% of other purpose closed/exempt loans, and 24% of loans with purpose "not applicable" in moderate-income tracts.

Finally, American's lending in moderate-income census tracts in 2023 was excellent. Of the bank's 89 HMDA loans, American originated 18% (16 loans) in moderate-income tracts, which exceeded the proxy of 16%, and matched the aggregate lending of 18%. By loan category, American originated 18% of home purchase loans, 15% refinance loans, 10% of home improvement loans, nearly 29% of multifamily loans, 25% of other purpose closed/exempt loans, and no other purpose lines of credit or loans with purpose "not applicable" in 2023. In comparison, aggregate lenders made 19% of home purchase loans, 18% of refinance loans, 14% of home improvement loans, 34% of multifamily loans, 13% of other purpose lines of credit, nearly 16% of other purpose closed/exempt loans, and 24% of loans with purpose "not applicable" in moderate-income tracts.

Responsiveness to Credit Needs

American exhibits a good record of servicing the credit needs of very small businesses, and low- and moderate-income individuals and areas, consistent with safe and sound banking practices. As mentioned previously, community contacts identified small business credit, and affordable housing as the predominant needs within the assessment area.

The bank's responsiveness to credit needs was met primarily through its small business and retail HMDA lending, and to a lesser extent, through its use of innovative and flexible retail lending practices, and its community development lending, which are discussed in more detail below.

Further, American was a participant in the SBA PPP program, and funded a total of 666 PPP loans totaling \$92.4 million in the bank's assessment area. The funding of these PPP loans demonstrates responsiveness to the needs of small businesses affected by the COVID-19 pandemic. Two of the PPP loans, totaling \$2.3 million, were included in the bank's community development lending totals, as they qualified under the revitalization and stabilization prong of community development.

Innovative and/or Flexible Lending Practices

American makes use of innovative and/or flexible lending practices in serving its assessment area's credit needs. Through a number of different programs, the bank made small business loans and home-mortgage loans to low- and moderate-income borrowers during the evaluation period.

Often, the credit needs of small businesses can be addressed more effectively through alternative commercial products. To address the credit needs of small businesses in the assessment area, American participates in SBA loan programs, including the SBA 7(a) and 504 programs. During the evaluation period, American made four SBA 7(a) loans totaling \$1.5 million in the assessment area.

Similarly, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. American participates in loan programs for first-time homebuyers through the Pennsylvania Housing Finance Agency (PHFA) loan program, the Federal Housing Administration's (FHA) loan program, the U.S. Department of Veteran's Affairs (VA) loan program, the U.S. Department of Agriculture's (USDA) Rural Development loan program. Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers. During the evaluation period, American made 17 PHFA loans totaling \$2.8 million, two FHA loans totaling \$502 thousand, and one USDA loan totaling \$213 thousand.

Finally, the bank provided closing cost/downpayment assistance through the Federal Home Loan Bank (FHLB) of Pittsburgh's First Front Door Program. During the evaluation period, the bank provided four grants through the program, totaling \$20 thousand within its assessment area.

Community Development Lending Activities

American makes a relatively high level of community development loans in the assessment area.

During the evaluation period of September 24, 2019 through October 7, 2024, the bank originated 14 community development loans aggregating \$15 million. American's community development lending showed an increase from the prior evaluation when the bank made nine community development loans totaling \$9.4 million.

Eleven of the 14 loans, totaling \$12.6 million supported affordable housing initiatives for low- and moderate-income individuals. One loan totaling \$50 thousand supported community services, and two loans totaling \$2.3 million supported revitalization and stabilization within low- or moderate-income census tracts in the assessment area.

The following table includes the bank's community development loans, broken out by community development purpose.

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

American Bank Allentown, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2018	1	948	0	0	0	0	0	0	1	948
2019	3	2,109	0	0	0	0	0	0	3	2,109
2020	2	2,812	0	0	0	0	1	1,040	3	3,852
2021	1	492	0	0	0	0	1	1,307	2	1,799
2022	2	1,035	0	0	0	0	0	0	2	1,035
2023	2	5,181	1	50	0	0	0	0	3	5,231
TOTAL	11	12,577	1	50	0	0	2	2,347	14	14,974

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Performance under the investment test is assessed as high satisfactory.

Volume of Investment and Grant Activity

American has a significant level of qualified community development investments and grants, occasionally in a leadership position. During the evaluation, qualified investments, grants and donations totaled nearly \$1.6 million, which is a substantial increase from \$428 thousand during the prior evaluation.

Investments and donations totaling \$936 thousand supported affordable housing initiatives (60%), and \$622 thousand (40%) supported the provision of community services in the assessment area.

Of the \$877 thousand in qualified investments which supported affordable housing, \$632 thousand were loan pools with the Community Lenders of Pennsylvania, and \$245 thousand were securities through Community Capital Management Community.

The bank also made donations totaling \$681 thousands to local organizations that routinely provide community development services to low- and moderate-income individuals in the assessment area. Of the \$681 thousand in donations, \$573 thousand were qualified donations to the Pennsylvania Educational Improvement Tax credit program. The remaining \$59 thousand were qualified donations that supported affordable housing, and \$49 thousand supported provisions of community services.

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

The following table present the investment and grant activity for the assessment area.

American Bank Allentown, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	7	877	0	0	0	0	0	0	7	877
Donations	10	59	52	622	0	0	0	0	62	681
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	17	936	52	622	0	0	0	0	69	1,558

Responsiveness to Credit and Community Development Needs

American exhibits adequate responsiveness to credit and community development needs of the assessment area. Community contacts identified small business loans and affordable housing as pronounced credit and community development needs within the assessment area. As noted in the table above, the majority of the investments and donations dollars in the assessment area (60%) addressed affordable housing.

Community Development Initiatives

American makes occasional use of innovative and/or complex investments to support community development initiatives. American participated in loan pools through Community Lenders with other banks to provide financing for projects benefiting low- to moderate-income individuals and/or low- to moderate- income areas in the assessment area. Furthermore, through Community Capital Management, the bank invested in two community impact bond funds, which have been earmarked as CRA-qualifying securities to benefit the assessment area. Both investments supported affordable housing initiatives, and carry more complexity than simple donations.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the assessment area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. The bank operates just one banking office, located in an upper-income census tract using both 2015 ACS and 2020 Census data. The branch office is located within a five-mile radius of the assessment area's low- and moderate-income census tracts. The bank also operates two ATMs, one located in the upper-income tract at the branch office, and the other in a middle-income census tract on the campus of Lehigh Carbon Community College in Schnecksville, PA. The ATMs are linked to the Allpoint and Accel ATM networks. Membership in these surcharge-free networks enhances affordable accessibility throughout the assessment area.

The bank operates a fully transactional website that allows consumers to conduct transactions through an online system (<https://www.ambk.com>). The bank's online system allows customers to apply for loans or credit accounts, open deposit accounts or pay bills online. Customers can also monitor account balances or transaction histories, and transfer funds between accounts. Online banking access is available through customer's personal computer, smartphone browser, or through the mobile phone application.

Finally, the bank offers bank-by-phone services at no cost to customers, through which customers can contact a customer service representative to assist with checking account balances, transferring funds between accounts, placing stop payments, obtaining recent account histories, and reordering checks.

Changes in Branch Locations

The bank did not open or close any branches during the evaluation period, and therefore this component of the service test was not considered in the evaluation.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences the assessment area, particularly low- and moderate-income geographies or individuals. The bank's single office location has extended hours on Fridays and offers Saturday morning banking hours.

Bank Products

American provides the following banking products, which provide greater access to banking services for low- and moderate-income customers, and small businesses.

- Forever Free-Checking, a non-interest-bearing account with no monthly maintenance fee, no minimum balance requirement, and a \$1 minimum balance to open. The account offers free online access through online banking and the mobile banking app, along with account access through the bank's customer service telephone line. The account also provides unlimited bill pay, free checks (first order only), a free debit card, and ATM rebates up to \$10 per statement cycle if an average daily balance of \$200 is maintained. This checking account provides greater access to banking services for low- and moderate-income customers.

- Business Checking, a non-interest-bearing account offered to area businesses with no monthly maintenance fee, no minimum balance required, no per check, per deposit, or per item fees, and a \$1 minimum balance to open. The account offers free online and mobile banking, a free business debit card, and free bill pay transactions for the first 50 transactions per month.
- Community Checking, an interest-bearing account offered to area not-for-profit organizations with no monthly maintenance fee, no per check, per deposit, or per item fees, and a \$1 minimum balance to open. The account offers free online and mobile banking, a free business debit card, and free bill pay transactions for the first 50 transactions per month.

Community Development Services

American provides an adequate level of community development services in its assessment area. Over the evaluation period, bank employees provided community development services and served in various capacities on boards and board-level committees. Some examples include:

- A loan officer served as an advisory board member for the Community Action Financial Services (CAFS), a program of the Community Action Committee of Lehigh Valley. Advisory board members provide input on the homeownership counseling program services provided by CAFS, which includes first-time homebuyer seminars, pre-settlement counseling, and pre-purchase counseling for low- and moderate-income families.
- A senior commercial loan officer served as a board member of the Community Lenders Community Development Corporation, whose mission is to provide opportunities through housing and commercial development projects that benefit low- and moderate-income individuals.
- A senior commercial loan officer served as a board member, Treasurer, and finance committee member of the Allentown School District Foundation. Their mission is to encourage and fund innovative educational programs and scholarships that enhance opportunities for students in the Allentown School District, where a majority of students are from low- or moderate-income families.
- The bank's chief financial officer and the director of marketing both served as board members of the Neighborhood Center, whose mission is to enhance lives and build futures for children of Jordan Heights, a low-income neighborhood in Allentown. The organization offers pre-school, after-school, and teen programming to Jordan Heights youth.
- A bank employee serves as a board member on the Valley Housing Development Corporation, a non-profit agency that administers funds that provide low-cost loans, and rents for low- and moderate-income individuals, and housing for homeless members of the community.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

American is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community credit needs, was identified.

CRA APPENDICES

CRA APPENDIX A: SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
Time Period Reviewed			
09/24/2019 – 10/07/2024			
Financial Institution		Products Reviewed	
American Bank		HMDA	
		Small Business	
Affiliates	Affiliate Relationship	Products Reviewed	
N/A	N/A	N/A	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Examination	Branches Visited	Other Information
Allentown-Bethlehem-Easton Assessment Area	Full-Scope	1	N/A

CRA APPENDIX B: SUMMARY OF STATE RATING

State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Commonwealth of Pennsylvania	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

CRA APPENDIX C: GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area or assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and its physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language.

- (1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
- (2) Community services targeted to low- or moderate-income individuals;
- (3) Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or
- (4) Activities that revitalize or stabilize—
 - (i) Low-or moderate-income geographies;
 - (ii) Designated disaster areas; or
 - (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on—
 - A. Rates of poverty, unemployment, and population loss; or
 - B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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, home equity 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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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 (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated area: A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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

CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2018 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	7	17.1%	1,054	11.8%	0	0.0%	0	0.0%
Moderate	6	14.6%	1,129	12.6%	4	9.8%	549	6.1%
Middle	13	31.7%	3,507	39.3%	4	9.8%	440	4.9%
Upper	15	36.6%	3,243	36.3%	17	41.4%	5,394	60.5%
Unknown	0	0.0%	0	0.0%	16	39.0%	2,550	28.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	41	100.0%	8,933	100.0%	41	100.0%	8,933	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.3%	55	2.7%	2	12.5%	45	2.2%
Middle	6	37.5%	903	43.5%	3	18.8%	296	14.3%
Upper	9	56.2%	1,116	53.8%	8	50.0%	1,345	64.8%
Unknown	0	0.0%	0	0.0%	3	18.7%	388	18.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	2,074	100.0%	16	100.0%	2,074	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	6	100.0%	410	100.0%	5	83.3%	350	85.4%
Unknown	0	0.0%	0	0.0%	1	16.7%	60	14.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	410	100.0%	6	100.0%	410	100.0%
Multi-Family								
Low	3	42.9%	1,812	37.7%	0	0.0%	0	0.0%
Moderate	2	28.6%	2,175	45.3%	0	0.0%	0	0.0%
Middle	2	28.5%	815	17.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	100.0%	4,802	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	4,802	100.0%	7	100.0%	4,802	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	12.5%	7	2.1%	2	25.0%	61	18.7%
Middle	4	50.0%	174	53.2%	3	37.5%	77	23.5%
Upper	3	37.5%	146	44.7%	2	25.0%	154	47.1%
Unknown	0	0.0%	0	0.0%	1	12.5%	35	10.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	327	100.0%	8	100.0%	327	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	10	12.8%	2,866	17.3%	0	0.0%	0	0.0%
Moderate	10	12.8%	3,366	20.3%	8	10.3%	655	4.0%
Middle	25	32.1%	5,399	32.6%	10	12.8%	813	4.9%
Upper	33	42.3%	4,915	29.8%	32	41.0%	7,243	43.7%
Unknown	0	0.0%	0	0.0%	28	35.9%	7,835	47.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	16,546	100.0%	78	100.0%	16,546	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2019 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	3.2%	136	1.9%	1	3.2%	88	1.3%
Moderate	5	16.1%	478	6.8%	3	9.7%	443	6.3%
Middle	8	25.8%	1,921	27.5%	6	19.4%	1,250	17.9%
Upper	17	54.9%	4,456	63.8%	13	41.9%	4,080	58.3%
Unknown	0	0.0%	0	0.0%	8	25.8%	1,130	16.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	6,991	100.0%	31	100.0%	6,991	100.0%
Refinance								
Low	2	3.3%	252	2.8%	4	6.7%	414	4.6%
Moderate	5	8.3%	541	6.0%	7	11.7%	677	7.5%
Middle	25	41.7%	3,780	41.8%	6	10.0%	1,126	12.4%
Upper	28	46.7%	4,472	49.4%	31	51.6%	5,301	58.6%
Unknown	0	0.0%	0	0.0%	12	20.0%	1,527	16.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	60	100.0%	9,045	100.0%	60	100.0%	9,045	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	14.3%	7	1.2%
Moderate	0	0.0%	0	0.0%	1	14.3%	238	39.1%
Middle	3	42.9%	485	79.8%	2	28.6%	50	8.2%
Upper	4	57.1%	123	20.2%	3	42.8%	313	51.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	608	100.0%	7	100.0%	608	100.0%
Multi-Family								
Low	2	25.0%	1,637	26.0%	0	0.0%	0	0.0%
Moderate	1	12.5%	595	9.4%	0	0.0%	0	0.0%
Middle	4	50.0%	3,622	57.5%	0	0.0%	0	0.0%
Upper	1	12.5%	444	7.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	8	100.0%	6,298	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	6,298	100.0%	8	100.0%	6,298	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	25.0%	25	16.7%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	25.0%	25	16.7%	0	0.0%	0	0.0%
Upper	3	75.0%	125	83.3%	3	75.0%	125	83.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	150	100.0%	4	100.0%	150	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	5	4.5%	2,025	8.8%	7	6.4%	534	2.3%
Moderate	11	10.0%	1,614	7.0%	11	10.0%	1,358	5.9%
Middle	41	37.3%	9,833	42.6%	14	12.7%	2,426	10.5%
Upper	53	48.2%	9,620	41.6%	50	45.4%	9,819	42.5%
Unknown	0	0.0%	0	0.0%	28	25.5%	8,955	38.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	110	100.0%	23,092	100.0%	110	100.0%	23,092	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2020 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	2	5.7%	186	2.4%	5	14.3%	643	8.2%
Moderate	3	8.6%	287	3.7%	2	5.7%	258	3.3%
Middle	14	40.0%	2,755	35.1%	5	14.3%	1,030	13.1%
Upper	16	45.7%	4,627	58.8%	17	48.6%	5,102	65.0%
Unknown	0	0.0%	0	0.0%	6	17.1%	822	10.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	7,855	100.0%	35	100.0%	7,855	100.0%
Refinance								
Low	1	1.0%	163	0.7%	4	4.2%	584	2.6%
Moderate	5	5.2%	1,180	5.2%	11	11.5%	1,272	5.6%
Middle	30	31.3%	6,727	29.8%	19	19.8%	3,526	15.6%
Upper	60	62.5%	14,507	64.3%	55	57.2%	16,044	71.1%
Unknown	0	0.0%	0	0.0%	7	7.3%	1,151	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	96	100.0%	22,577	100.0%	96	100.0%	22,577	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	100.0%	172	100.0%
Moderate	1	50.0%	30	17.4%	0	0.0%	0	0.0%
Middle	1	50.0%	142	82.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	172	100.0%	2	100.0%	172	100.0%
Multi-Family								
Low	4	40.0%	1,884	21.2%	0	0.0%	0	0.0%
Moderate	3	30.0%	3,369	38.0%	1	10.0%	250	2.8%
Middle	2	20.0%	2,100	23.7%	1	10.0%	480	5.4%
Upper	1	10.0%	1,520	17.1%	2	20.0%	872	9.9%
Unknown	0	0.0%	0	0.0%	6	60.0%	7,271	81.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	8,873	100.0%	10	100.0%	8,873	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	87	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	87	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	87	100.0%	1	100.0%	87	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	7	4.9%	2,233	5.6%	11	7.6%	1,399	3.5%
Moderate	12	8.3%	4,866	12.3%	14	9.7%	1,780	4.5%
Middle	48	33.3%	11,811	29.9%	25	17.4%	5,036	12.7%
Upper	77	53.5%	20,654	52.2%	75	52.1%	22,105	55.9%
Unknown	0	0.0%	0	0.0%	19	13.2%	9,244	23.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	144	100.0%	39,564	100.0%	144	100.0%	39,564	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2021 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	2.3%	184	1.8%
Moderate	7	15.9%	1,344	13.1%	8	18.2%	1,265	12.3%
Middle	16	36.4%	3,097	30.1%	5	11.4%	1,179	11.5%
Upper	21	47.7%	5,836	56.8%	13	29.5%	4,639	45.1%
Unknown	0	0.0%	0	0.0%	17	38.6%	3,010	29.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	10,277	100.0%	44	100.0%	10,277	100.0%
Refinance								
Low	0	0.0%	0	0.0%	3	3.7%	202	1.3%
Moderate	5	6.1%	590	3.7%	10	12.2%	1,548	9.7%
Middle	29	35.4%	4,893	30.7%	24	29.3%	4,309	27.0%
Upper	48	58.5%	10,446	65.6%	45	54.8%	9,870	62.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	15,929	100.0%	82	100.0%	15,929	100.0%
Home Improvement								
Low	1	14.3%	30	6.5%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	57.1%	235	50.5%	0	0.0%	0	0.0%
Upper	2	28.6%	200	43.0%	6	85.7%	435	93.5%
Unknown	0	0.0%	0	0.0%	1	14.3%	30	6.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	465	100.0%	7	100.0%	465	100.0%
Multi-Family								
Low	1	12.5%	492	3.1%	0	0.0%	0	0.0%
Moderate	1	12.5%	1,277	7.9%	0	0.0%	0	0.0%
Middle	4	50.0%	12,740	79.0%	0	0.0%	0	0.0%
Upper	2	25.0%	1,611	10.0%	1	12.5%	1,361	8.4%
Unknown	0	0.0%	0	0.0%	7	87.5%	14,759	91.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	16,120	100.0%	8	100.0%	16,120	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	50	28.2%	0	0.0%	0	0.0%
Middle	2	50.0%	87	49.2%	1	25.0%	12	6.8%
Upper	1	25.0%	40	22.6%	3	75.0%	165	93.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	177	100.0%	4	100.0%	177	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	2	1.4%	522	1.2%	4	2.8%	386	0.9%
Moderate	14	9.7%	3,261	7.6%	18	12.4%	2,813	6.5%
Middle	55	37.9%	21,052	49.0%	30	20.7%	5,500	12.8%
Upper	74	51.0%	18,133	42.2%	68	46.9%	16,470	38.4%
Unknown	0	0.0%	0	0.0%	25	17.2%	17,799	41.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	145	100.0%	42,968	100.0%	145	100.0%	42,968	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2022 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	2.6%	380	3.0%	4	10.5%	448	3.6%
Moderate	9	23.7%	1,173	9.3%	3	7.9%	598	4.7%
Middle	15	39.5%	3,750	29.7%	8	21.1%	2,144	17.0%
Upper	13	34.2%	7,314	58.0%	12	31.6%	6,155	48.8%
Unknown	0	0.0%	0	0.0%	11	28.9%	3,272	25.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	12,617	100.0%	38	100.0%	12,617	100.0%
Refinance								
Low	0	0.0%	0	0.0%	3	9.7%	190	3.0%
Moderate	5	16.1%	712	11.4%	4	12.9%	663	10.6%
Middle	12	38.7%	1,845	29.5%	4	12.9%	587	9.4%
Upper	14	45.2%	3,702	59.1%	15	48.4%	4,019	64.2%
Unknown	0	0.0%	0	0.0%	5	16.1%	800	12.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	6,259	100.0%	31	100.0%	6,259	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	9.1%	8	1.0%
Moderate	1	9.1%	8	1.0%	0	0.0%	0	0.0%
Middle	5	45.5%	390	49.6%	4	36.4%	230	29.3%
Upper	5	45.4%	388	49.4%	4	36.3%	418	53.2%
Unknown	0	0.0%	0	0.0%	2	18.2%	130	16.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	786	100.0%	11	100.0%	786	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	44.4%	1,297	19.8%	0	0.0%	0	0.0%
Middle	5	55.6%	5,255	80.2%	1	11.1%	675	10.3%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	8	88.9%	5,877	89.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	6,552	100.0%	9	100.0%	6,552	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	48	100.0%
Middle	1	100.0%	48	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	48	100.0%	1	100.0%	48	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	1.1%	380	1.4%	8	8.9%	646	2.5%
Moderate	19	21.1%	3,190	12.1%	8	8.9%	1,309	5.0%
Middle	38	42.2%	11,288	43.0%	17	18.9%	3,636	13.8%
Upper	32	35.6%	11,404	43.5%	31	34.4%	10,592	40.3%
Unknown	0	0.0%	0	0.0%	26	28.9%	10,079	38.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	90	100.0%	26,262	100.0%	90	100.0%	26,262	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2023 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	2	3.6%	283	1.4%	3	5.5%	576	2.9%
Moderate	10	18.2%	1,469	7.3%	2	3.6%	335	1.7%
Middle	25	45.5%	9,226	46.0%	3	5.5%	540	2.7%
Upper	18	32.7%	9,061	45.3%	34	61.8%	15,442	77.0%
Unknown	0	0.0%	0	0.0%	13	23.6%	3,146	15.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	20,039	100.0%	55	100.0%	20,039	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	15.4%	750	32.2%	2	15.4%	250	10.7%
Middle	7	53.8%	1,180	50.6%	3	23.1%	394	16.9%
Upper	4	30.8%	402	17.2%	6	46.1%	938	40.2%
Unknown	0	0.0%	0	0.0%	2	15.4%	750	32.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	2,332	100.0%	13	100.0%	2,332	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	10.0%	50	6.4%
Moderate	1	10.0%	150	19.1%	2	20.0%	80	10.2%
Middle	5	50.0%	385	49.0%	0	0.0%	0	0.0%
Upper	4	40.0%	250	31.8%	7	70.0%	655	83.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	785	100.0%	10	100.0%	785	100.0%
Multi-Family								
Low	1	14.3%	2,650	20.9%	0	0.0%	0	0.0%
Moderate	2	28.6%	1,006	7.9%	0	0.0%	0	0.0%
Middle	3	42.9%	5,885	46.4%	0	0.0%	0	0.0%
Upper	1	14.2%	3,150	24.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	100.0%	12,691	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	12,691	100.0%	7	100.0%	12,691	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	65	19.2%	0	0.0%	0	0.0%
Middle	2	50.0%	260	76.7%	1	25.0%	65	19.2%
Upper	1	25.0%	14	4.1%	1	25.0%	244	72.0%
Unknown	0	0.0%	0	0.0%	2	50.0%	30	8.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	339	100.0%	4	100.0%	339	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	3	3.4%	2,933	8.1%	4	4.5%	626	1.7%
Moderate	16	18.0%	3,440	9.5%	6	6.7%	665	1.8%
Middle	42	47.2%	16,936	46.8%	7	7.9%	999	2.8%
Upper	28	31.4%	12,877	35.6%	48	53.9%	17,279	47.8%
Unknown	0	0.0%	0	0.0%	24	27.0%	16,617	45.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	89	100.0%	36,186	100.0%	89	100.0%	36,186	100.0%

CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	4	3.8%	1,194	5.1%	0	0.0%	0	0.0%
Moderate	11	10.6%	2,891	12.3%	0	0.0%	0	0.0%
Middle	40	38.5%	10,149	43.1%	0	0.0%	0	0.0%
Upper	49	47.1%	9,315	39.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	104	100.0%	23,549	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	56	53.8%	10,931	46.4%	0	0.0%	0	0.0%
Over \$1 Million	41	39.4%	9,381	39.8%	0	0.0%	0	0.0%
Not Known	7	6.8%	3,237	13.8%	0	0.0%	0	0.0%
Total	104	100.0%	23,549	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	43	41.3%	2,444	10.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	34	32.7%	5,890	25.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	27	26.0%	15,215	64.6%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	104	100.0%	23,549	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	24	42.9%	1,300	11.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	19	33.9%	3,094	28.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	13	23.2%	6,537	59.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	56	100.0%	10,931	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	40	8.2%	5,860	6.8%	0	0.0%	0	0.0%
Moderate	61	12.5%	11,479	13.4%	0	0.0%	0	0.0%
Middle	166	33.9%	31,739	37.0%	0	0.0%	0	0.0%
Upper	222	45.4%	36,607	42.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	489	100.0%	85,685	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	55	11.2%	14,067	16.4%	0	0.0%	0	0.0%
Over \$1 Million	34	7.0%	9,429	11.0%	0	0.0%	0	0.0%
Not Known	400	81.8%	62,189	72.6%	0	0.0%	0	0.0%
Total	489	100.0%	85,685	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	280	57.3%	11,749	13.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	124	25.4%	19,918	23.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	76	15.5%	37,937	44.3%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	9	1.8%	16,080	18.8%	0	0.0%	0	0.0%
Total	489	100.0%	85,685	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	13	23.6%	794	5.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	22	40.0%	3,404	24.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	20	36.4%	9,869	70.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	55	100.0%	14,067	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	21	5.6%	3,254	5.4%	0	0.0%	0	0.0%
Moderate	45	11.9%	7,640	12.6%	0	0.0%	0	0.0%
Middle	138	36.6%	24,045	39.6%	0	0.0%	0	0.0%
Upper	173	45.9%	25,757	42.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	377	100.0%	60,696	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	52	13.8%	11,178	18.4%	0	0.0%	0	0.0%
Over \$1 Million	51	13.5%	13,349	22.0%	0	0.0%	0	0.0%
Not Known	274	72.7%	36,169	59.6%	0	0.0%	0	0.0%
Total	377	100.0%	60,696	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	213	56.5%	8,316	13.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	93	24.7%	14,906	24.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	69	18.3%	34,655	57.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	2	0.5%	2,819	4.6%	0	0.0%	0	0.0%
Total	377	100.0%	60,696	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	14	26.9%	677	6.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	20	38.5%	3,184	28.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	18	34.6%	7,317	65.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	11,178	100.0%	0	0.0%	0	0.0%

LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	15	13.9%	3,962	13.4%	0	0.0%	0	0.0%
Middle	46	42.6%	13,588	45.9%	0	0.0%	0	0.0%
Upper	47	43.5%	12,033	40.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	108	100.0%	29,583	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	58	53.7%	16,997	57.5%	0	0.0%	0	0.0%
Over \$1 Million	46	42.6%	11,736	39.7%	0	0.0%	0	0.0%
Not Known	4	3.7%	850	2.8%	0	0.0%	0	0.0%
Total	108	100.0%	29,583	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	26	24.1%	1,595	5.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	44	40.7%	7,254	24.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	38	35.2%	20,734	70.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	108	100.0%	29,583	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	10	17.2%	593	3.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	27	46.6%	4,380	25.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	21	36.2%	12,024	70.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	58	100.0%	16,997	100.0%	0	0.0%	0	0.0%

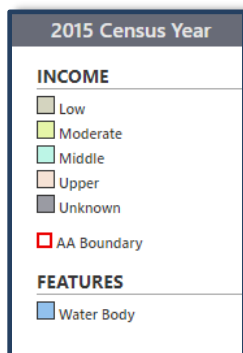
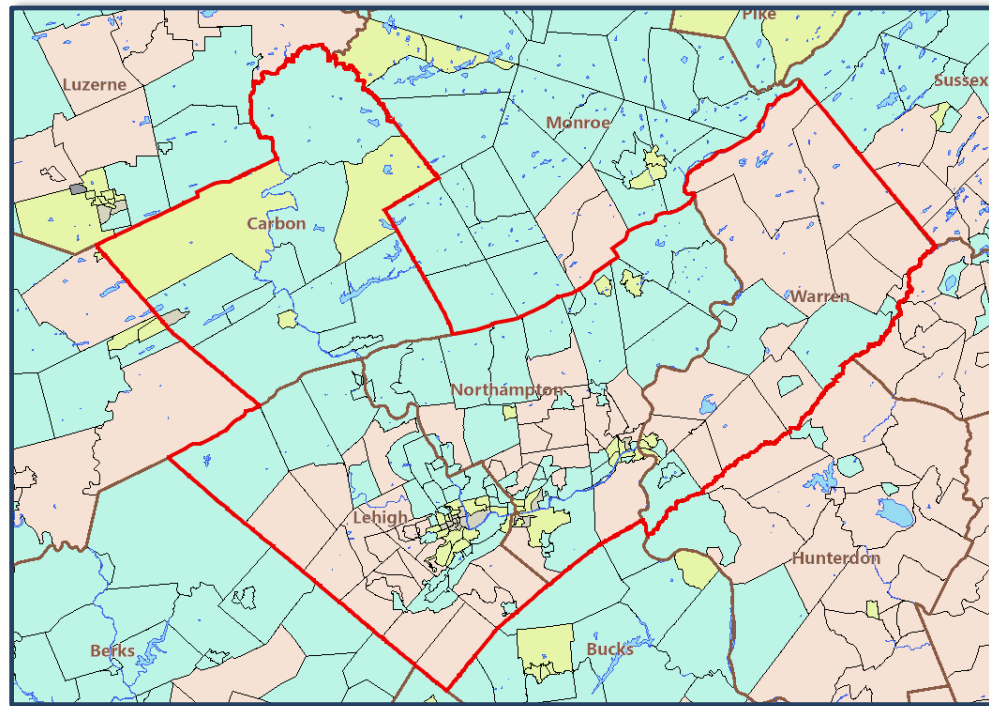
LARGE INSTITUTION PERFORMANCE EVALUATION
OCTOBER 2024

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	2	2.9%	450	2.2%	0	0.0%	0	0.0%
Moderate	14	20.0%	3,873	18.6%	0	0.0%	0	0.0%
Middle	28	40.0%	7,734	37.1%	0	0.0%	0	0.0%
Upper	26	37.1%	8,762	42.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	20,819	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	26	37.1%	7,148	34.3%	0	0.0%	0	0.0%
Over \$1 Million	37	52.9%	10,858	52.2%	0	0.0%	0	0.0%
Not Known	7	10.0%	2,813	13.5%	0	0.0%	0	0.0%
Total	70	100.0%	20,819	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	20	28.6%	1,318	6.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	20	28.6%	3,403	16.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	30	42.8%	16,098	77.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	20,819	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	7	26.9%	474	6.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	9	34.6%	1,526	21.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	10	38.5%	5,148	72.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	7,148	100.0%	0	0.0%	0	0.0%

CRA APPENDIX F: ASSESSMENT AREA MAPS

ALLENTOWN, PA ASSESSMENT AREA (2015 ACS Data)



ALLENTOWN, PA ASSESSMENT AREA (2020 Census Data)

