



## **Table of Contents**

INSTITUTION'S CRA RATING.....	1
SCOPE OF EXAMINATION.....	1
DESCRIPTION OF INSTITUTION .....	3
DESCRIPTION OF ASSESSMENT AREA .....	4
CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA.....	16
CRA APPENDICES .....	29
CRA APPENDIX A: GLOSSARY .....	30
CRA APPENDIX B: HMDA LOAN DISTRIBUTION TABLES .....	33
CRA APPENDIX C: SMALL BUSINESS LOAN DISTRIBUTION TABLES .....	38
CRA APPENDIX D: ASSESSMENT AREA MAPS .....	41

### **INSTITUTION'S CRA RATING**

The institution is rated satisfactory overall. Both the lending test and the community development test are rated satisfactory.

Summary of major factors contributing to this rating:

- The bank's loan-to-deposit ratio was more than reasonable given the bank's size, financial condition and assessment area credit needs.
- A substantial majority of loans and other lending related activities are in the bank's assessment area.
- Given the demographics of the assessment area, the distribution of borrowers reflects reasonable penetration among individuals of different income levels (including low- and moderate-income borrowers) and reasonable penetration among businesses of different sizes.
- The geographic distribution of home-mortgage and small business loans reflects poor dispersion throughout the assessment area.
- The bank demonstrates adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### **SCOPE OF EXAMINATION**

The performance of New Tripoli Bank (New Tripoli) under the Community Reinvestment Act (CRA) was evaluated using the Interagency Intermediate Small Institution Examination Procedures adopted by the Board of Governors. Performance for intermediate small banks is evaluated under two tests that consider the bank's lending and community development activities. The review period for this evaluation is from November 5, 2013 through February 5, 2018, and evaluates the bank's performance in its single assessment area using full-scope examination procedures.

The lending test includes an analysis of:

- the loan-to-deposit ratio;
- the volume of loans extended inside and outside the bank's assessment area;
- the extent of lending to borrowers of different income levels, including low- and moderate-income borrowers, and businesses of different sizes, including small businesses;
- the geographic distribution of lending within the assessment area, including low- and moderate-income census tracts; and
- the bank's response to CRA-related complaints.

Under the lending test, the loan products evaluated consisted of:

- Home-purchase, home-improvement and multifamily loans and the refinancing of such loans, collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar years 2014, 2015 and 2016, and 2017.
- Sample of 60 small business loans originated in 2015 and 2016.

Loan products were weighted according to loan and dollar volume. Residential mortgage loans (HMDA loans) were weighted the highest in determining the bank's overall CRA performance, as they comprise 68% of the bank's loan portfolio by dollar volume. Commercial loans, which comprise 26% of the loan portfolio by dollar volume, were given less weight. The consumer loan portfolio was not considered, as it comprises less than 1% of the loan portfolio.

New Tripoli is a HMDA reporter, and therefore the bank's HMDA performance was compared to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to HMDA. At the time of this evaluation, aggregate HMDA data was available for comparison in 2014, 2015 and 2016, but not for 2017.

For purposes of evaluating the geographic distribution of loans, census tracts are classified on the basis of 2010 U.S. Census data for loans originated in 2014, 2015 and 2016. Loans originated in 2017 were classified on the basis of the updated 2015 American Community Survey (ACS) data<sup>1</sup>. The distribution of HMDA loans to borrowers of different income levels for the years 2014, 2015, 2016 and 2017 were based on annually-adjusted Department of Housing and Urban Development (HUD) median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). Unless otherwise noted, all other demographic indices and statistics presented throughout this evaluation are based on 2010 Census data for the bank's 2014, 2015 and 2016 activity, and on the basis of 2015 ACS data for 2017.

New Tripoli does not report small business loans for purposes of CRA and, therefore, the analysis of the bank's small business lending is based on a sample of 60 commercial loans originated in 2015 and 2016. For small business loans, examiners compared the bank's lending to Dun & Bradstreet data. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses. Because New Tripoli is not a small business reporter, it is not included in the ranking of aggregate lenders who report such loans in the Allentown-Bethlehem-Easton, PA MSA. Consequently, the bank's performance was not directly compared to the lending of aggregate small business lenders. Conversely, aggregate lending was considered for contextual purposes only.

The community development test includes an analysis of:

- The number and dollar amount of community development loans;
- The number and dollar amount of qualified investments;
- The extent to which the bank provides community development services; and

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<sup>1</sup>According to Federal Financial Institutions Examination Council (FFIEC) [policy](#), 2015 ACS data is used to analyze 2017 lending data, while previous years use 2010 Census data for comparison.

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- The bank’s responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services.

Under the community development test, the bank’s level of community development loans, qualified investments and community development services were evaluated during the entire evaluation period, from November 5, 2013 through February 5, 2018. New Tripoli’s level of community development activities was considered in the context of local needs and opportunities, as well as the bank’s capacity to participate in such activities.

### **DESCRIPTION OF INSTITUTION**

New Tripoli was rated satisfactory at its previous CRA Evaluation dated November 4, 2013, also using the Interagency Intermediate Small Institution Examination Procedures.

New Tripoli is a state chartered community bank headquartered in New Tripoli, Lehigh County, Pennsylvania. New Tripoli is the sole bank subsidiary of New Tripoli Bancorp, Inc. (Bancorp). Bancorp also operates one nonbank subsidiary. The bank operates two branches and a loan production office, all located in Lehigh County. The main office, located in the village of New Tripoli, in a rural middle-income census tract, was opened in 1909. The second office, located in an upper-income census tract in Orefield, was opened in 1999. The loan production office was opened in 2016, and is located in Emmaus, in a middle-income census tract.

The bank offers a variety of consumer and commercial banking services, including automated teller machines (ATMs) at its two office locations and two more in local malls. Additionally, the institution accommodates its customers with alternative delivery methods including online and mobile banking, which allow customers to transfer funds between accounts and obtain account balances. The bank also offers a free checking account with no minimum balance requirement and no monthly service charge. These features provide greater access to banking services for low- and moderate-income consumers.

The bank’s assets have increased 22% since its previous CRA evaluation, growing from \$356 million as of September 30, 2013, to \$436 million as of September 30, 2017. Of its total assets, 73% are loans. New Tripoli’s loans aggregate \$324 million, which is an increase of 38% compared to \$235 million at the prior evaluation period. Residential mortgage loans remain the leading loan product in terms of total outstanding loan dollars (69%).

The table<sup>2</sup> on the following page shows the composition of the bank’s loan portfolio as of September 30, 2017.

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<sup>2</sup>Source: New Tripoli’s Consolidated Reports of Condition and Income (Call Report) as of September 2017.

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**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

<b>LOANS as of 09/30/17</b>	<b>\$000</b>	<b>%</b>
Commercial Mortgages	62,555	19.3%
Commercial and Industrial Loans	20,448	6.3%
Secured by Farmland	2,289	0.7%
Secured by Residential Properties (Closed-end)	212,422	65.5%
Secured by Residential Properties (Open-end)	11,044	3.4%
Construction & Land Development	6,213	1.9%
Multifamily Residential Properties	6,623	2.0%
Consumer Loans	1,843	0.6%
Loans to Finance Agricultural Production & Other Loans to Farmers	6	0.0%
States and Political Subdivisions	673	0.2%
Other Loans	7	0.0%
<b>TOTAL</b>	<b>\$324,123</b>	<b>100.00%</b>

Schedule RC-C Part II (Loans to Small Businesses and Small Farms) of the Call Report as of September 30, 2017 indicated that 61% of New Tripoli's commercial loans were designated as small business loans, as detailed in the following table.

<b>New Tripoli Bank COMMERCIAL LOAN PORTFOLIO</b>		
	<b>AMOUNT OUTSTANDING AS OF 9/30/2017 (\$000)</b>	<b>PERCENT</b>
Loans with original amounts of \$100,000 or less	5,038	6.1
Loans with original amounts of more than \$100,000 through \$250,000	11,411	13.7
Loans with original amounts of more than \$250,000 through \$1,000,000	33,956	40.9
<b>Total Small Business Loans</b>	<b>50,405</b>	<b>60.7</b>
Loans with original amounts of more than \$1,000,000	32,598	39.3
<b>Total Commerical Loans</b>	<b>83,003</b>	<b>100.0%</b>

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

**DESCRIPTION OF ASSESSMENT AREA**

For purposes of CRA, New Tripoli designated its assessment area to include all of Lehigh County and parts of adjacent Carbon, Northampton, Berks, and Schuylkill Counties (Allentown assessment area). The assessment area is predominantly suburban and rural, with the exception of the city of Allentown, in Lehigh County. New Tripoli is located in the Allentown-Bethlehem-Easton MSA. The bank's assessment area was determined to comply with the requirements of the CRA and does not arbitrarily exclude low- or moderate-income census tracts.

Examiners analyzed the demographic characteristics of the assessment area as one way to measure loan demand. Further, bank management provided information regarding the bank's lending activities, credit demand and competition. The demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers or geography. Rather, the demographic data provides a business context for the bank's performance in the assessment area in which it operates.

To supplement economic, demographic and performance data, and to gain a better perspective on credit and community development needs in the assessment area, interviews were conducted with two community representatives during the course of the evaluation. More specifically, discussions were held with a community action advocacy organization and an affordable housing agency within the assessment area.

Community contacts raised concerns about the effect that poor quality schools have on Allentown, which is having a negative impact on families' desire to purchase homes in the city of Allentown. Additionally, contacts noted a need for quality affordable housing stock. The area has many blighted properties, and absentee landlords further impact an already challenging housing market. Additionally, though there has been an influx of new warehousing jobs in the area, they are not located near housing that is affordable to low- and moderate-income individuals. Further, public transportation to warehouse sites is lacking, making it difficult for low- and moderate-income individuals to access these job opportunities. Finally, interviewees revealed that gap financing for the rehabilitation of Section 8 housing is a critical need in the assessment area.

### **2010 Census Data**

At the 2010 Census, there were 87 census tracts in the assessment area: 76 census tracts in Lehigh County, five in Carbon County, four in Northampton County, one census tract in Berks County, and one in Schuylkill County. Of the 87 census tracts, 12 are designated as low-income, 19 as moderate-income, 37 as middle-income, and 19 as upper-income. Collectively, 33% of the assessment area's population resides in the low- or moderate-income census tracts. Between 2014 and 2016 all twelve of the low-income tracts and nine of the moderate-income tracts were located in the city of Allentown in Lehigh County. In addition, three moderate-income tracts were in Fullerton, three were in Bethlehem, and one each in Fountain Hill and Walnutport in Lehigh County. The remaining two moderate-income tracts were in Lehigh and Palmerton in Carbon County.

### **2015 ACS Data**

At the 2015 ACS update, there were 87 census tracts in the assessment area: 76 census tracts in Lehigh County, five in Carbon County, four in Northampton County, one census tract in Berks County, and one in Schuylkill County. Of the 86 census tracts, 11 are designated as low-income, 16 as moderate-income, 37 as middle-income, and 23 as upper-income census tracts. Collectively, 29% of the assessment area's population resides in the low- or moderate-income census tracts. In 2017 all eleven of the low-income tracts and nine of the moderate-income tracts were located in the city of Allentown in Lehigh County. In addition, one moderate-income tract was in Fullerton, four were in Bethlehem, and one in Fountain Hill, Lehigh County.

The remaining moderate-income tract is in Lehigh, Carbon County. Maps of the Allentown assessment area, using 2010 Census data, as well as 2015 ACS data are available in Appendix D.

New Tripoli's CRA performance was evaluated in terms of the demographic and business context in which the bank operates. The Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report, as of June 30, 2017, shows there were 21 depository institutions operating in Lehigh County, where New Tripoli operates its two branches and one LPO. These institutions maintained 96 banking offices, holding just over \$7 billion in deposits. New Tripoli ranked ninth among these institutions, with almost \$306 million in deposits, or 4% of the deposit market. Wells Fargo Bank, N.A., ranked first with 28% of market deposits, followed by Branch Banking and Trust Company with 12%, and PNC Bank, N.A. with 7% of the deposit market.

As noted previously, New Tripoli's home-mortgage lending was compared to the aggregate of all lenders in the assessment area that report real estate loans pursuant to the HMDA. Annual data below provides information on the relative market share for HMDA loans in the bank's assessment area. The most recent year for which aggregate data is available is 2016.

In 2014, New Tripoli was the fourteenth largest residential mortgage lender in its assessment area. According to aggregate HMDA data, 10,056 home-mortgage loans were collectively originated or purchased by 330 financial institutions in the assessment area. New Tripoli originated 190 of those loans, representing a market share of 2%. Wells Fargo Bank, N.A., ranked first, with 15% of the market, followed by JPMorgan Chase Bank, N.A. with 5%, and Quicken Loans, Inc. with 3% of HMDA originations or purchases. First Northern Bank and Trust Company ranked highest among local banks at twelfth, with over 2% of the market.

In 2015, New Tripoli was the nineteenth largest residential mortgage lender in its assessment area. According to aggregate HMDA data, 11,049 home-mortgage loans were collectively originated or purchased by 362 financial institutions in the assessment area. New Tripoli originated 137 of those loans, holding a market share of just over 1%. Wells Fargo Bank, N.A., ranked first, with 13% of the market, followed by American Neighborhood Mortgage with 4%, and JPMorgan Chase Bank, N.A. with just under 4% of the HMDA market. Embassy Bank for the Lehigh Valley ranked highest among local banks at eighth, with 2% of the market.

In 2016, New Tripoli was the seventeenth largest residential mortgage lender in its assessment area. According to aggregate HMDA data, 11,642 home-mortgage loans were collectively originated or purchased by 380 financial institutions in the assessment area. New Tripoli originated 169 of those loans, holding a market share of 1%. Wells Fargo Bank, N.A., ranked first, with 13% of the market, followed by American Neighborhood Mortgage with 5%, and Quicken Loans, Inc. with just under 4% of the HMDA market. Embassy Bank for the Lehigh Valley again ranked highest among local banks at sixth with 3% of the market.

As mentioned previously, New Tripoli does not report small business loans for purposes of CRA, and therefore is not included in the ranking of small business lenders operating in the assessment area. However, small business market share information is provided below for contextual purposes only.

According to 2014 aggregate CRA data, there were a total of 67 small business reporters in the bank's assessment area. These 67 reporters collectively originated or purchased 6,518 small business loans in 2014. American Express Bank, FSB ranked first, originating or purchasing over 14% of reported small business loans, followed by Wells Fargo Bank, N.A. with 14%, and Capital One Bank USA, N.A. with 9% of the small business market. American Bank ranked highest of local banks, holding the eleventh slot, with 2% market share.

In 2015, 81 small business reporters in the bank's assessment area collectively originated or purchased 6,997 small business loans. American Express Bank, FSB again ranked first, originating or purchasing 14% of reported small business loans, followed by Wells Fargo Bank, N.A. with just under 14%, and US Bank, N.A. with 9% of the small business market. Of local banks, American Bank ranked the highest (twelfth) with 2% market share.

In 2016, 100 small business reporters in the bank's assessment area collectively originated or purchased 7,630 small business loans. American Express Bank, FSB ranked first, originating or purchasing nearly 17% of reported small business loans. Wells Fargo Bank, N.A. and Citibank, N.A. followed in second and third, with 11% and 8% of the small business market, respectively. As in other years, American Bank led local banks, ranking thirteenth with just under 2% of the small business market.

Since CRA small business loan reporting includes small business loans issued by reporters under corporate credit card arrangements, the reporters with the highest rankings include national originators, such as American Express Bank, FSB, Citibank, N.A., Capital One Bank USA, N.A., US Bank, N.A., Chase Bank USA, N.A., and Synchrony Bank. Together, these six institutions, all ranked in the top ten small business lenders, originated 46% of all small business loans reported in 2016 in the Allentown-Bethlehem-Easton, PA MSA.

New Tripoli operates in a highly competitive banking market and competes with super-regional banks Wells Fargo Bank, N.A., PNC Bank, N.A., and Bank of America, N.A. In addition, many locally-headquartered community banks provide competition for New Tripoli, including American Bank, Embassy Bank for the Lehigh Valley, Lafayette Ambassador Bank, and First Northern Bank and Trust Company.

## **ECONOMIC CHARACTERISTICS**

Located in eastern Pennsylvania, the Allentown-Bethlehem-Easton MSA is situated between the Philadelphia and New York City metropolitan areas. The MSA had a population of 821,173 as of the 2010 Census, making it the third-largest metropolitan area in Pennsylvania. The MSA itself is part of the larger New York-Newark, NY-NJ-CT-PA Combined Statistical Area, which contains approximately 22 million people.

According to Moody's Analytics Precis Report, the local workforce in the MSA is primarily service-based with education and health services representing over 20% of the total jobs in the MSA. Professional and business services are the second-largest category, accounting for nearly 14% of employment in the MSA. The state and local government, and retail trade sectors also provide significant employment throughout the area, each accounting for 11% of all employment in the MSA.

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**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

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The five largest employers in the MSA are the Lehigh Valley Hospital Center, St. Luke’s Hospital, Air Products and Chemicals, Sands Bethworks Gaming, LLC, and Dorney Park/Wildwater Kingdom.

According to Moody’s, the economy in the Allentown-Bethlehem-Easton, PA MSA is beginning to show some weaknesses, and is considered to be “at risk.” The MSA has lost jobs over the past year, particularly in the professional/business services and healthcare/education segments. Several logistics firms have moved into the area, lifting transportation/warehousing employment to an all-time high, however, this has not been enough to offset the job losses in the other industries. The jobless rate is near a decade low, but poor job mix is hurting average hourly earnings, which are down almost \$1 from 2015.

Strengths of the MSA include its proximity to the more expensive New York City and Philadelphia areas, and the fact that downtown revitalization in Allentown, in Lehigh County, and Bethlehem and Easton, in neighboring Northampton County, is spurring investment and employment activities. On the other hand, weaknesses include weak government finances, aging infrastructure, and an aging population, coupled with weak in-migration patterns.

The following data shows that although the unemployment rate has generally been on a downward trend, the unemployment rates in most counties that comprise New Tripoli’s assessment area, with the exception of Berks County, still match or exceed the rates for the Commonwealth of Pennsylvania and the nation as a whole in each year. As seen in the table below, unemployment rates are highest in Schuylkill and Carbon counties, and lowest in Berks and Northampton counties. The unemployment rates for the assessment area are presented in the following table, along with state and nationwide statistics.

<b>New Tripoli Bank Allentown Assessment Area Unemployment Rates (Not Seasonally Adjusted)</b>				
<b>Geographical Area</b>	<b>Annual 2014</b>	<b>Annual 2015</b>	<b>Annual 2016</b>	<b>Annual 2017</b>
Lehigh County	6.1%	5.3%	5.3%	5.0%
Northampton County	5.9%	5.3%	5.2%	4.9%
Carbon County	7.1%	6.1%	6.0%	5.6%
Schuylkill County	7.1%	6.3%	6.2%	5.9%
Berks	5.5%	4.9%	5.0%	4.6%
Allentown-Bethlehem-Easton MSA	6.1%	5.4%	5.2%	4.9%
Pennsylvania	5.9%	5.3%	5.4%	4.9%
United States	6.2%	5.3%	4.9%	4.4%

**Unemployment data is from United States Department of Labor’s Bureau of Labor Statistics.**

## **HOUSING**

### **2010 Census Data**

According to 2010 Census data, the bank's assessment area contained 168,526 housing units, 66% of which were owner-occupied, 27% of which were rental units, and 6% of which were vacant units. The overall owner-occupancy rate in the assessment area (66%) was higher than the statewide rate of 63%. Single-family units comprised 75% of all housing units in the assessment area, while two-to-four family units comprised 9%. Multifamily units comprised 12% of housing units, and mobile homes were just under 4% of all units.

The amount of owner-occupied housing located within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such census tracts. Owner-occupied units in low-income census tracts represented 31% of total housing units in these tracts. In moderate-income census tracts, owner-occupied units represented 51% of total housing units in these tracts. Owner occupancy in low- and moderate-income census tracts fell significantly below the percentage of owner-occupied units in middle-income (73%) and upper-income (84%) census tracts.

The median age of the housing stock in the assessment area was 47 years, which is slightly younger than the statewide median of 50 years. Of note, the age of the housing stock was appreciably higher in low- and moderate-income tracts (61 and 60 years, respectively), than in middle- and upper-income census tracts (44 and 28 years, respectively).

According to the 2010 Census data, the median housing value in the assessment area was \$196,081, which is less than the value for the Allentown MSA (\$215,234), and more than the median housing value for the Commonwealth of Pennsylvania (\$159,300). The data also indicated a significant disparity between housing values in low-income census tracts (\$107,266) and moderate-income tracts (\$140,309), when compared to values in middle-income census tracts (\$195,767), and upper-income census tracts (\$277,178).

Median gross rent (rent plus utilities) in the assessment area was \$807, with 49% of renters paying more than 30% of their income for housing. Median rent in the Allentown MSA was slightly higher at \$828, with nearly 48% of renters paying more than 30% of income for housing. Renters in the Commonwealth of Pennsylvania as a whole fared much better, paying a median rent of \$739, with 44% paying more than 30% of their income for housing.

### **2015 ACS Data**

Using 2015 ACS data, the bank's assessment area contained 170,360 housing units, 64% of which were owner-occupied, 29% of which were rental units, and just below 7% of which were vacant units. The overall owner-occupancy rate fell slightly from 2010, and was once again lower than the statewide rate of 61%. Single-family units comprised 75% of all housing units in the assessment area according to the 2017 ACS. Additionally, two-to-four family units comprised 9% of the units. Multifamily units comprised nearly 13% of the housing stock, and mobile homes comprised 3%.

The amount of owner-occupied housing units within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such tracts. Owner-occupied units represented 26% of total units in the low-income census tracts, and 46% in moderate-income tracts, compared to the percentage of owner-occupied units in middle-income (68%) and upper-income (80%) census tracts.

The median age of the housing stock was 55 years, making it comparable to the statewide median of 54 years. Using 2015 ACS data, the median housing value in the assessment area declined slightly to \$187,746. As with 2010 Census data, 2015 ACS data indicate differences between the median housing value in the assessment area's low-income tracts (\$90,326) and moderate-income tracts (\$128,232), compared with those in middle-income tracts (\$175,042) and upper-income census tracts (\$258,423). Housing value in all income levels declined at the 2015 ACS, but low-income housing values declined more significantly at a rate of 16%, compared to upper-income tracts that decreased at a rate of 7%.

Finally, median rent in the assessment area swelled to \$916, with 51% of renters paying more than 30% of their income for housing. Median rent in the Allentown MSA was \$941, with 50% of renters paying more than 30% of income for housing. The statewide median rent was lower at \$840, with 46% of renters paying more than 30% of their income for housing.

## **BORROWER INCOME DATA**

### **2010 Census Data**

The percentage of low- and moderate-income families is used as a proxy to estimate demand for home-mortgage lending in the assessment area. According to the 2010 Census, of the 107,850 families in the assessment area, 22% were low-income, 19% were moderate-income, 22% were middle-income, and 38% were upper-income. Families living below the poverty level represented 8% of the total families in the assessment area, which was on par with the statewide level and above the MSA poverty level (7%).

### **2015 ACS Data**

Based on the 2015 ACS data, of the 107,074 families in the assessment area, 22% were low-income, 19% were moderate-income, 21% were middle-income, and 38% were upper-income. Families living below the poverty level represented 9% of the total families in the assessment area, comparing unfavorably to the MSA poverty level of 8%, but mirroring the statewide level.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were categorized based upon HUD's annually-adjusted median family income data made available by the FFIEC for the Allentown-Bethlehem-Easton, PA MSA.

The HUD-adjusted annual median family incomes for the MSA for the years 2014, 2015, 2016 and 2017 are listed in the following table, and are categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

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**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

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Year	HUD-Adjusted Median Family Income	Low Income (<50%)	Moderate Income (50%-less than 80%)	Middle Income (80%-less than 120%)	Upper Income (120% or Greater)
2014	\$68,800	Less than \$34,400	\$34,400 - \$55,039	\$55,040 - \$82,559	\$82,560 or more
2015	\$71,200	Less than \$35,600	\$35,600 - \$56,959	\$56,960 - \$85,439	\$85,440 or more
2016	\$70,900	Less than \$35,450	\$35,450 - \$56,719	\$56,720 - \$85,079	\$85,080 or more
2017	\$75,200	Less than \$37,600	\$37,600- \$60,159	\$60,160- \$90,239	\$90,240 or more

**GEOGRAPHIC BUSINESS DATA****2010 Census 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. According to Dun & Bradstreet, in 2014, there were 17,646 businesses in the assessment area. Of these businesses, 8% were located in low-income tracts, and 18% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (45% and 29%, respectively). Business demographic data also revealed that of the 17,646 businesses in the assessment area, 89% were small businesses with gross annual revenues of \$1 million or less.

In 2015, there were 18,952 businesses in the assessment area. The distribution of businesses among census tracts of different income levels did not change. Of the businesses, 91% were small businesses with revenues of \$1 million or less.

In 2016, the number of businesses in the assessment area dropped to 17,486. Again, the geographic distribution of businesses remained the same. Of the total businesses, 90% were small businesses with revenues of \$1 million or less.

**2015 ACS Data**

According to Dun & Bradstreet, in 2017, there were 17,486 businesses in the assessment area. Of these businesses, 7% were located in low-income tracts, and 15% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (43% and 36%, respectively). Business demographic data also revealed that of the 17,486 businesses in the assessment area, 90% were small businesses with gross annual revenues of \$1 million or less.

The demographics used to assess the performance context in which New Tripoli operated in 2014, 2015, 2016 and 2017 are provided in the following tables. As mentioned previously, 2010 Census data is used for 2014, 2015 and 2016, and updated 2015 ACS data is used for demographic comparison in 2017.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

New Tripoli Bank Assessment Area Demographics Allentown Assessment Area 2014								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	13.8	9,822	9.1	3,343	34.0	23,391	21.7
Moderate-income	19	21.8	21,464	19.9	3,062	14.3	20,250	18.8
Middle-income	37	42.5	48,161	44.7	2,062	4.3	23,642	21.9
Upper-income	19	21.8	28,403	26.3	679	2.4	40,567	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>87</b>	<b>100.0</b>	<b>107,850</b>	<b>100.0</b>	<b>9,146</b>	<b>8.5</b>	<b>107,850</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	17,944	5,642	5.0	31.4	10,097	56.3	2,205	12.3
Moderate-income	37,070	18,980	17.0	51.2	15,735	42.4	2,355	6.4
Middle-income	74,450	54,661	48.8	73.4	15,355	20.6	4,434	6.0
Upper-income	39,062	32,683	29.2	83.7	4,957	12.7	1,422	3.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>168,526</b>	<b>111,966</b>	<b>100.0</b>	<b>66.4</b>	<b>46,144</b>	<b>27.4</b>	<b>10,416</b>	<b>6.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1,439	8.2	1,221	7.8	147	11.1	71	11.1
Moderate-income	3,140	17.8	2,715	17.3	289	21.7	136	21.2
Middle-income	7,970	45.2	7,182	45.8	505	38.0	283	44.1
Upper-income	5,097	28.9	4,558	29.1	388	29.2	151	23.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>17,646</b>	<b>100.0</b>	<b>15,676</b>	<b>100.0</b>	<b>1,329</b>	<b>100.0</b>	<b>641</b>	<b>100.0</b>
	Percentage of Total Businesses:			88.8	7.5		3.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	8	2.2	8	2.2	0	0.0	0	0.0
Middle-income	251	67.8	248	68.1	3	50.0	0	0.0
Upper-income	111	30.0	108	29.7	3	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>370</b>	<b>100.0</b>	<b>364</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	Percentage of Total Farms:			98.4	1.6		.0	

Information based on 2010 Census Data and 2014 Dun & Bradstreet Information.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

New Tripoli Bank Assessment Area Demographics Allentown Assessment Area 2015								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	13.8	9,822	9.1	3,343	34.0	23,391	21.7
Moderate-income	19	21.8	21,464	19.9	3,062	14.3	20,250	18.8
Middle-income	37	42.5	48,161	44.7	2,062	4.3	23,642	21.9
Upper-income	19	21.8	28,403	26.3	679	2.4	40,567	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>87</b>	<b>100.0</b>	<b>107,850</b>	<b>100.0</b>	<b>9,146</b>	<b>8.5</b>	<b>107,850</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	17,944	5,642	5.0	31.4	10,097	56.3	2,205	12.3
Moderate-income	37,070	18,980	17.0	51.2	15,735	42.4	2,354	6.4
Middle-income	74,450	54,661	48.8	73.4	15,355	20.6	4,434	6.0
Upper-income	39,062	32,683	29.2	83.7	4,957	12.7	1,422	3.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>168,526</b>	<b>111,966</b>	<b>100.0</b>	<b>66.4</b>	<b>46,144</b>	<b>27.4</b>	<b>10,416</b>	<b>6.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1,555	8.2	1,365	7.9	178	11.7	12	9.7
Moderate-income	3,313	17.5	2,989	17.3	309	20.3	15	12.1
Middle-income	8,522	45.0	7,860	45.4	591	38.8	71	57.3
Upper-income	5,562	29.3	5,090	29.4	446	29.3	26	21.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>18,952</b>	<b>100.0</b>	<b>17,304</b>	<b>100.0</b>	<b>1,524</b>	<b>100.0</b>	<b>124</b>	<b>100.0</b>
	Percentage of Total Businesses:			91.3	8.0		.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	16	4.4	15	4.2	1	14.3	0	0.0
Middle-income	241	65.8	238	66.3	3	42.9	0	0.0
Upper-income	109	29.8	106	29.5	3	42.9	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>366</b>	<b>100.0</b>	<b>359</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	Percentage of Total Farms:			98.1	1.9		.0	

Information based on 2010 Census Data and 2015 Dun & Bradstreet Information.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

New Tripoli Bank Assessment Area Demographics Allentown Assessment Area 2016								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	13.8	9,822	9.1	3,343	34.0	23,391	21.7
Moderate-income	19	21.8	21,464	19.9	3,062	14.3	20,250	18.8
Middle-income	37	42.5	48,161	44.7	2,062	4.3	23,642	21.9
Upper-income	19	21.8	28,403	26.3	679	2.4	40,567	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>87</b>	<b>100.0</b>	<b>107,850</b>	<b>100.0</b>	<b>9,146</b>	<b>8.5</b>	<b>107,850</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	17,944	5,642	5.0	31.4	10,097	56.3	2,205	12.3
Moderate-income	37,070	18,980	17.0	51.2	15,735	42.4	2,355	6.4
Middle-income	74,450	54,661	48.8	73.4	15,355	20.6	4,434	6.0
Upper-income	39,062	32,683	29.2	83.7	4,957	12.7	1,422	3.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>168,526</b>	<b>111,966</b>	<b>100.0</b>	<b>66.4</b>	<b>46,144</b>	<b>27.4</b>	<b>10,416</b>	<b>6.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,448	8.3	1,250	8.0	182	11.4	16	8.9
Moderate-income	3,065	17.5	2,723	17.3	318	20.0	24	13.3
Middle-income	7,847	44.9	7,126	45.3	632	39.7	89	49.4
Upper-income	5,126	29.3	4,616	29.4	459	28.8	51	28.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>17,486</b>	<b>100.0</b>	<b>15,715</b>	<b>100.0</b>	<b>1,591</b>	<b>100.0</b>	<b>180</b>	<b>100.0</b>
	Percentage of Total Businesses:			89.9			9.1	1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	13	4.0	12	3.8	1	12.5	0	0.0
Middle-income	215	65.7	211	66.1	4	50.0	0	0.0
Upper-income	99	30.3	96	30.1	3	37.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>327</b>	<b>100.0</b>	<b>319</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	Percentage of Total Farms:			97.6			2.4	.0

Information based on 2010 Census Data and 2016 Dun & Bradstreet Information.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

New Tripoli Bank Assessment Area Demographics Allentown Assessment Area 2017								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	12.6	8,838	8.3	3,149	35.6	23,477	21.9
Moderate-income	16	18.4	17,633	16.5	3,068	17.4	19,943	18.6
Middle-income	37	42.5	45,434	42.4	2,411	5.3	22,902	21.4
Upper-income	23	26.4	35,169	32.8	882	2.5	40,752	38.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>87</b>	<b>100.0</b>	<b>107,074</b>	<b>100.0</b>	<b>9,510</b>	<b>8.9</b>	<b>107,074</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	15,933	4,064	3.7	25.5	9,291	58.3	2,578	16.2
Moderate-income	30,577	13,994	12.9	45.8	14,320	46.8	2,263	7.4
Middle-income	73,294	49,991	46.0	68.2	18,963	25.9	4,340	5.9
Upper-income	50,556	40,634	37.4	80.4	7,335	14.5	2,587	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>170,360</b>	<b>108,683</b>	<b>100.0</b>	<b>63.8</b>	<b>49,909</b>	<b>29.3</b>	<b>11,768</b>	<b>6.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	1,229	7.0	1,077	6.9	136	8.5	16	8.9
Moderate-income	2,608	14.9	2,271	14.5	324	20.4	13	7.2
Middle-income	7,448	42.6	6,766	43.1	592	37.2	90	50.0
Upper-income	6,201	35.5	5,601	35.6	539	33.9	61	33.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>17,486</b>	<b>100.0</b>	<b>15,715</b>	<b>100.0</b>	<b>1,591</b>	<b>100.0</b>	<b>180</b>	<b>100.0</b>
	Percentage of Total Businesses:			89.9		9.1		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	2	0.6	2	0.6	0	0.0	0	0.0
Moderate-income	11	3.4	10	3.1	1	12.5	0	0.0
Middle-income	176	53.8	173	54.2	3	37.5	0	0.0
Upper-income	138	42.2	134	42.0	4	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>327</b>	<b>100.0</b>	<b>319</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	Percentage of Total Farms:			97.6		2.4		.0

Information based on 2015 ACS Data and 2017 Dun & Bradstreet Information.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

**LENDING TEST**

Overall, New Tripoli's lending test is rated satisfactory. Performance under each component test is discussed below.

**Loan-to-Deposit Ratio**

New Tripoli's loan-to-deposit ratio is considered more than reasonable given the bank's size, financial condition, and assessment area credit needs.

A financial institution's loan-to-deposit ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is expressed as an average, derived by adding the quarterly loan-to-deposit ratios and dividing the total by the number of quarters.

The table on the following page shows that New Tripoli's loan-to-deposit ratio averaged just under 94% over the 16 consecutive quarters since the previous CRA evaluation. The bank's ratio was well above the peer group average loan-to-deposit ratio of 79%. The bank's ratio at the current evaluation is also higher than its ratio at its previous CRA evaluation (88%).

In absolute terms, the bank's net loan volume increased 36% over the evaluation period, from nearly \$236 million as of December 31, 2014 to over \$320 million at September 20, 2017. During this timeframe, deposits also increased, but at a lower rate (18%). As detailed in the table, deposits measured almost \$271 million at December 31, 2013, and had grown to over \$319 million by September 30, 2017.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

<b>New Tripoli Bank Historical Loan-to-Deposit Ratios</b>				
<b>AS OF DATE</b>	<b>NET LOANS (THOUSANDS)</b>	<b>TOTAL DEPOSITS (THOUSANDS)</b>	<b>RATIO</b>	<b>PEER GROUP</b>
09/30/2017	320,261	319,490	100.2	82.1
06/30/2017	310,165	305,748	101.4	81.7
03/31/2017	295,757	293,375	100.8	80.4
12/31/2016	284,056	297,503	95.5	81.1
09/30/2016	278,276	289,109	96.3	81.2
06/30/2016	272,127	283,418	96.0	81.3
03/31/2016	269,199	285,339	94.3	80.0
12/31/2015	265,497	283,892	93.5	80.1
09/30/2015	263,492	288,858	91.2	79.8
06/30/2015	260,097	271,871	95.7	79.3
03/31/2015	255,384	277,547	92.0	77.4
12/31/2014	253,176	279,857	90.5	78.3
09/30/2014	247,123	284,511	86.9	77.6
06/30/2014	242,514	271,078	89.5	77.0
03/31/2014	238,252	268,036	88.9	74.8
12/31/2013	235,668	270,721	87.1	75.8
<b>Quarterly Loan-to-Deposit Average Since Previous Evaluation</b>			<b>93.7</b>	<b>79.3</b>

Bank lending levels reflect responsiveness to assessment area credit needs. As of September 30, 2017, net loans represented 74% of assets, compared to 65% of assets at New Tripoli's previous CRA Evaluation. The peer group average was 69% as of September 30, 2017.

**Assessment Area Concentration**

A majority of New Tripoli's loans and other lending-related activities are in the assessment area. The table below indicates that 78% of the total number of HMDA loans reported during the evaluation period, and 81% of the aggregate dollar amount of HMDA loans reported were extended in the bank's assessment area.

With respect to small business loans, 73% of the number of small business loans sampled was extended within the bank's assessment area, while 73% of the aggregate dollar amount of small business loans sampled was extended in New Tripoli's assessment area.

The table on the following page shows the distribution of lending inside and outside the bank's assessment area, indicating that a majority of loans and other lending activities are inside its assessment area.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

<b>New Tripoli Bank Lending Inside and Outside the Assessment Area</b>								
<b>Loan Type-Description</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home-Purchase -Conventional	336	73.2	63,403	77.6	123	26.8	18,315	22.4
Home-Improvement	145	82.4	14,764	83.9	31	17.6	2,830	16.1
Multifamily Housing	12	85.7	4,559	94.1	2	14.3	285	5.9
Refinancing	177	85.1	\$32,601	86.9	31	14.9	4,902	13.1
<b>Total HMDA related</b>	<b>670</b>	<b>78.2</b>	<b>115,327</b>	<b>81.4</b>	<b>187</b>	<b>21.8</b>	<b>26,332</b>	<b>18.6</b>
Small Business	44	73.3	5,824	73.0	16	26.7	2,157	27.0
<b>Total Small Business related</b>	<b>44</b>	<b>73.3</b>	<b>5,824</b>	<b>73.0</b>	<b>16</b>	<b>26.7</b>	<b>2,157</b>	<b>27.0</b>
<b>TOTAL LOANS</b>	<b>714</b>	<b>77.9</b>	<b>121,151</b>	<b>81.0</b>	<b>203</b>	<b>22.1</b>	<b>28,489</b>	<b>19.0</b>

**Borrower Distribution of Lending**

An analysis of New Tripoli’s home-mortgage and small business loans<sup>3</sup> was conducted in conjunction with a review of the demographic and economic characteristics of the assessment area to determine the extent of lending to borrowers of different income levels and businesses of difference sizes. As mentioned previously, New Tripoli’s loan portfolio is primarily comprised of residential real estate lending. Accordingly, home-mortgage loans were weighted more heavily than small business lending in this analysis.

Given the assessment area’s demographic and economic characteristics, the distribution of borrowers reflects reasonable penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

**Home-Mortgage Lending**

New Tripoli’s distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is reasonable. Over the evaluation period New Tripoli originated 670 HMDA loans in the assessment area, in an aggregate amount of \$115 million.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted HUD median family income data. Further, the respective percentages of low-, moderate-, middle- and upper-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. As noted previously, according to the 2010 Census data, approximately 22% of assessment area families were low-income and 19% were moderate-income. The majority of assessment area families were middle- and upper-income families (22% and 38%, respectively). No significant changes were noted when using updated 2015 ACS data.

<sup>3</sup>The information used to evaluate lending activity by New Tripoli is detailed in the Loan Distribution Tables contained in the Appendix.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. Approximately 41% of families in the bank’s assessment area were designated as low or moderate-income, indicating a need for affordable housing and home-mortgage credit among this segment of the population. However, as previously mentioned, community contacts raised concerns about the limited availability of quality housing stock and the perceived poor quality of schools. Contacts specifically referenced that when there are qualified low- or moderate-income buyers, they tend to look for properties outside of the city of Allentown, where schools will provide quality education for their children. According to the 2010 Census, the median housing value was \$196,081 for the Allentown MSA. In the city of Allentown, where 36% of the low- and moderate-income families reside, the median housing value was \$136,700. So while low- and moderate-income families may prefer to purchase homes outside of the city, they may not qualify, due to higher-priced housing. Alternatively, the demand for subsidized rental housing has increased in those areas just outside the city, so low- and moderate-income families can benefit from the schools in those areas where purchasing affordable housing may be inaccessible.

The table below details the borrower distribution of the bank’s HMDA loans during the evaluation period, comparing lending levels with the borrower distribution of aggregate HMDA lenders, and to demographic proxies. As noted previously, lending in 2014, 2015 and 2016 is compared to 2010 Census demographic data, while 2017 lending is compared with demographic data from the 2015 ACS update.

New Tripoli Bank Distribution of HMDA Loans by Borrower Income Level (2014 - 2017)									
Income Level	% Families by Family Income Level (2010 Census)	% Families by Family Income Level (2015 ACS)	Aggregate Comparison						
			2014		2015		2016		2017*
			% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending
Low	21.7	21.9	6.8	8.3	2.9	7.9	8.9	7.8	5.7
Moderate	18.8	18.6	15.8	18.9	21.9	17.6	16.0	18.2	13.8
Middle	21.9	21.4	20.0	20.6	12.4	20.6	26.0	20.9	24.7
Upper	37.6	38.1	52.6	34.2	58.4	33.7	40.8	35.2	39.1
Unknown	0.0	0.0	4.7	18.0	4.4	20.1	8.3	17.8	16.7
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

\*Aggregate data for 2017 is not available

**Lending to Low-Income Borrowers**

For the period under review, New Tripoli’s lending to low-income borrowers was reasonable.

**2010 Census Data**

According to the 2010 Census approximately 22% of the families in the assessment area were low-income families. In assessing the level of the bank’s lending among low-income borrowers, the evaluation takes into consideration that the home-mortgage credit needs of such individuals and families can be a challenge to address through conventional loan products, presenting a significant obstacle to homeownership.

As mentioned previously, 49% of the assessment area's renters spent more than 30% of their gross income for housing, making it difficult for them, particularly low-income renters, to save the customary down payment and closing costs necessary to purchase a home.

New Tripoli's lending in 2014 to low-income borrowers was reasonable. During 2014, just under 7% of the bank's HMDA loans were to low-income borrowers in the assessment area, slightly less than the aggregate lending level of 8%, but substantially below the proxy of 22%. New Tripoli made 5% of its home-purchase loans, 6% of refinance loans, 12% of home improvement loans and no multifamily loans to low-income borrowers in 2014. Most categories lagged aggregate lenders, who made 8% of home-purchase loans, 8% of refinance loans, 10% of home improvement loans, and no multifamily loans to low-income borrowers.

New Tripoli's lending in 2015 to low-income borrowers was poor. Overall the bank made 3% of loans to low-income borrowers, compared to aggregate lending of 8% and proxy of 22%. New Tripoli originated no home-purchase loans, home improvement loans or multifamily loans to low-income borrowers. However, the bank originated 10% of refinance loans to low-income borrowers in 2015. Aggregate levels were 10% for home-purchase loans, 5% for refinance loans, 8% for home improvement loans and no multi-family loans extended to low-income borrowers in 2015.

New Tripoli's lending in 2016 to low-income borrowers was reasonable. New Tripoli originated 9% of its loans to low-income borrowers, which exceeded aggregate lending levels (8%), but remained far below proxy (22%). By product type, 9% of the bank's home-purchase loans, 9% of refinance loans, just under 10% of home improvement loans, and no multifamily loans were made to low-income borrowers in 2016. The bank's lending was similar to 2016 aggregate lending levels of 10% of home-purchase loans, 5% of refinance loans, 8% of home improvement loans, and no multifamily loans made to low-income borrowers.

### **2015 ACS Data**

New Tripoli's lending in 2017 to low-income borrowers was reasonable. In 2017, 6% of loans were made to low-income borrowers compared to the proxy of low-income families, at 22%. Aggregate lending data for 2017 was not available for comparison at the time of the evaluation. By product, 4% of New Tripoli's home-purchase loans, 7% of refinance loans, 9% of home improvement loans, and no multifamily loans were made to low-income borrowers in 2017.

### **Lending to Moderate-Income Borrowers**

Although challenges and obstacles to homeownership also exist for moderate-income families and individuals, New Tripoli's lending to moderate-income borrowers within the assessment area for the period under review was reasonable, and was notably higher than lending to low-income borrowers.

### **2010 Census Data**

According to the 2010 Census data, 19% of the families within the assessment area were categorized as moderate-income.

New Tripoli's 2014 HMDA lending to moderate-income borrowers was reasonable. In 2014, 16% of the bank's loans were to moderate-income borrowers, compared to proxy and aggregate lending, both at 19%. New Tripoli made 18% of home-purchase loans, 18% of refinance loans, 10% of home improvement loans, and no multifamily loans to moderate-income borrowers. Aggregate lending data show that 21% of home-purchase loans, 16% of refinance loans, 20% of home improvement loans, and no multifamily loans were made to moderate-income borrowers.

New Tripoli's lending in 2015 to moderate-income borrowers was excellent. In 2015, the bank originated 22% of its HMDA loans to moderate-income borrowers, which exceeded both aggregate lending and proxy, at 18% and 19%, respectively. New Tripoli originated 15% of its home-purchase loans, 23% of its refinance loans, 36% of its home improvement loans, and no multifamily loans to moderate-income borrowers in 2015. Aggregate lenders made 21% of home-purchase loans, 13% of refinance loans, 18% of home-improvement loans, and no multifamily loans to moderate-income borrowers in 2015.

New Tripoli's lending in 2016 to moderate-income borrowers was reasonable. The bank originated 16% of its home-mortgage loans to moderate-income borrowers, which was below the 2016 aggregate lending level of 18%, and the proxy of 19% of moderate-income families in the assessment area. New Tripoli originated 19% of its home-purchase loans, 11% of its refinance loans, 17% of its home-improvement loans, and no multifamily loans to moderate-income borrowers in 2016. Aggregate figures for 2016 were 21% of home-purchase loans, 14% of refinance loans, 16% of home improvement loans, and no multifamily loans to moderate-income borrowers.

### **2015 ACS Data**

New Tripoli's lending in 2017 to moderate-income borrowers was reasonable. In 2017, the bank originated 14% of its home-mortgage loans to moderate-income borrowers compared to proxy of 19%. Aggregate figures for 2017 were unavailable for comparison at the time of the evaluation. By product type, New Tripoli made just under 10% of home-purchase loans, 19% of refinance loans, 22% of home improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

### **Small Business Lending**

The bank's distribution of loans to businesses reflects excellent 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 business.

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for small business credit in the assessment area. According to 2015 business demographics, 18,952 businesses operated in the assessment area, and 17,304 (91%) as small businesses. In 2016, the number of businesses dropped to 17,486 businesses. Of the total, 15,715 (90%) were small businesses with gross revenues less than or equal to \$1 million.

As mentioned previously, the performance evaluation measures New Tripoli's small business loan performance using a sample of 60 of the bank's small business loans from calendar years 2015 and 2016.

In 2015, New Tripoli originated 15 small business loans in its assessment area, aggregating just over \$2 million. Of these loans, 100% were to small businesses with revenues of \$1 million or less. The bank's lending to small businesses was higher than the aggregate lending level of 52% to small businesses by all lenders in the assessment area, and higher than the proxy of 91% of small businesses in the assessment area in 2015.

Small business loans were further analyzed to determine the extent to which loans were originated in an amount of \$100 thousand or less. Small 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 needs of small businesses. In 2015, 80% of New Tripoli's small business loans were extended in an amount of \$100 thousand or less. This compared favorably to aggregate lenders, who extended 52% of small business loans in this amount.

In 2016, New Tripoli originated 29 small business loans in its assessment area, totaling nearly \$4 million. Of these loans, 100% were extended to small businesses with revenues of \$1 million or less. The bank's lending exceeded the aggregate lending level of 50% of loans to small businesses, as well as the proxy of 90%. In 2016, 59% of New Tripoli's small business loans were extended in an amount of \$100 thousand or less, compared to aggregate lenders who extended 92% of small business loans in the same amount.

### **Geographic Distribution of Lending**

The geographic distribution of home-mortgage and small business loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects poor dispersion throughout the assessment area, including low- and moderate-income tracts.

### **Home-Mortgage Lending**

New Tripoli's geographic distribution of home mortgages reflects poor dispersion throughout the assessment area, taking into consideration the bank's business strategy and the assessment area's demographics and economic characteristics.

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**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
**FEBRUARY 2018**

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As previously noted, 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 tract, the greater the demand for home-mortgage credit is in the tract.

According to 2010 Census data, which was used as a proxy for 2014, 2015, and 2016 lending demand, 5% of owner-occupied housing units were located in low-income census tracts, and 17% of owner-occupied units were located in moderate-income tracts. The majority of owner-occupied units were located in middle- and upper-income tracts (48% and 29%, respectively). Similarly, the 2015 ACS data, which was used as a proxy for 2017 lending demand, indicates that 4% of owner-occupied housing units were located in low-income census tracts and 13% were located in moderate-income tracts in the assessment area. The majority of owner-occupied units were again located in middle- and upper-income census tracts (46% and 37%, respectively).

The table below presents New Tripoli’s geographic distribution of HMDA lending for 2014, 2015, 2016 and 2017, in comparison to applicable owner-occupied housing proxies and available aggregate lending levels for the years evaluated.

New Tripoli Bank Geographic Distribution of HMDA Loans (2014 – 2017)									
Income Level	% Owner-Occupied Housing Units (2010 Census)	% Owner-Occupied Housing Units (2015 ACS)	Aggregate Comparison						
			2014		2015		2016		2017*
			% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending
Low	5.0	3.7	2.6	4.8	1.5	3.9	0.1	4.2	1.7
Moderate	17.0	12.9	3.7	16.9	2.9	16.6	7.1	17.0	1.7
Middle	48.8	46.0	44.2	45.3	49.6	44.8	50.9	44.8	54.4
Upper	29.2	37.4	49.5	33.0	46.0	34.7	41.4	33.9	42.5
Unknown	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100.0</b>	<b>100</b>

\*Aggregate data for 2017 is not available.

### Lending in Low-Income Census Tracts

New Tripoli’s overall HMDA lending in low-income tracts was considered poor.

#### 2010 Census Data

New Tripoli’s HMDA lending in low-income geographies in 2014 was reasonable. In 2014, New Tripoli made approximately 3% of its HMDA loans in low-income census tracts, which was below the aggregate and proxy measures of 5% each. By product type, New Tripoli made 4% of home-purchase loans (four loans) and 2% of home improvement loans (one loan) in low-income tracts. The bank extended no refinance or multifamily loans in low-income tracts. Aggregate lenders made 5% of home-purchase and refinance loans, 3% of home improvement loans, and 27% of multifamily loans in low-income tracts in 2014.

New Tripoli's lending in low-income census tracts in 2015 was poor. In 2015, New Tripoli made just under 2% of its lending in low-income tracts, below both the aggregate lending level of 4%, and the proxy of owner-occupied units in low-income tracts (5%). By product type, 2% of the bank's home-purchase loans (one loan), and 3% of refinance loans (one loan) were made in low-income census tracts. New Tripoli did not extend any home improvement or multifamily loans in low-income tracts in 2015. By comparison, aggregate lenders extended 4% of home-purchase loans, 4% of refinance loans, 3% of home improvement loans, and 25% of multifamily loans in low-income tracts in 2015.

New Tripoli's lending in low-income census tracts in 2016 was poor. In 2016, New Tripoli made less than 1% of its HMDA lending in low-income tracts, which was below the aggregate lending level 4%, and the proxy of owner-occupied units in low income tracts at 5%. In 2016, only one home-purchase loan, and no refinance, home improvement or multifamily loans were made by New Tripoli in low-income tracts. Aggregate lenders made 5% of home-purchase loans, 3% of refinance loans, 4% of home improvement loans, and 23% of multifamily loans in low-income census tracts in 2016.

### **2015 ACS Data**

New Tripoli's lending in low-income census tracts in 2017 was poor. New Tripoli made 2% of its HMDA lending in low-income tracts in 2017, which was below the proxy of 4%. Aggregate lending data was not available for comparison at the time of the evaluation. By product, New Tripoli made 2% of home-purchase loans (two loans), 2% of refinance loans (one loan), and no home improvement or multifamily loans in low-income census tracts.

### **Lending in Moderate-Income Census Tracts**

New Tripoli's overall HMDA lending in moderate-income tracts was poor.

### **2010 Census Data**

New Tripoli's lending in moderate-income census tracts in 2014 was poor. The bank made 4% of HMDA loans in moderate-income tracts, which was well below both aggregate performance and proxy (both 17%). By product, 4% of New Tripoli's home-purchase loans (four loans), 2% of refinance loans (one loan), 5% of home improvement loans (two loans), and no multifamily loans were made within moderate-income tracts. Aggregate lenders made 17% of home-purchase loans, 17% of refinance loans, 15% of home improvement loans, and 42% of multifamily loans in moderate-income census tracts in 2014.

New Tripoli's lending in moderate-income census tracts in 2015 was poor. The bank made 3% of HMDA loans in moderate-income tracts, again, well below both aggregate performance and proxy (both 17%). By product, the bank made 2% of home-purchase loans (one loan), 3% of refinance loans (one loan), 7% of home improvement loans (two loans), and no multifamily loans in moderate-income census tracts. By comparison, aggregate lenders made 18% of home-purchase loans, 15% of refinance loans, 14% of home improvement loans, and 29% of multifamily loans in moderate-income tracts in 2015.

New Tripoli's lending in moderate-income census tracts in 2016 was reasonable. The bank made 7% of HMDA loans in moderate-income tracts, measuring below both aggregate performance and proxy (both 17%). By product, New Tripoli made 5% of home-purchase loans (four loans), 7% of refinance loans (three loans), 7% of home improvement loans (three loans), and 40% of multifamily loans (two loans) in moderate-income census tracts. By comparison, aggregate lenders originated 19% of home-purchase loans, 14% of refinance loans, 14% of home improvement loans, and 40% of multifamily loans in moderate-income tracts in 2016.

### **2015 ACS Data**

New Tripoli's lending in moderate-income census tracts in 2017 was poor. The bank made 2% of HMDA loans in moderate-income tracts, well below the proxy of 13% of owner-occupied units in moderate-income census tracts. Aggregate lending data was not available for comparison at the time of the evaluation. By product, New Tripoli made 2% of home-purchase loans (two loans) and 20% of multifamily loans (one loan) in moderate-income tracts. No refinance or home improvement loans were made in moderate-income census tracts in 2017.

### **Small Business Lending**

The geographic distribution of New Tripoli's small business loans reflects poor dispersion throughout the assessment area, in the context of the assessment area's demographic and economic characteristics, during the evaluation period. As explained previously, New Tripoli's small business performance is evaluated using a sample of 60 small business loans from 2015 and 2016.

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 business loans in the tract. Based on Dun & Bradstreet small business data, in 2015, 8% of businesses were located in low-income census tracts, 18% were in moderate-income tracts, 45% in middle-income tracts and 29% in upper-income tracts. Dun & Bradstreet data from 2016 shows very little change in the distribution of businesses among census tract income levels.

The table on the following page presents the distribution of New Tripoli's 2015 and 2016 sample of small business loans in comparison to the applicable business proxy and aggregate.

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

New Tripoli Bank Geographic Distribution of Small Business Loans (2015 and 2016 Sample)*						
Census Tract Income Level	% Businesses By Tract Income Level 2015	% Businesses By Tract Income Level 2016	Aggregate Comparison			
			2015		2016	
			% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending
Low	8.2	8.3	0.0	7.8	0.0	7.2
Moderate	17.5	17.5	6.7	17.1	10.3	17.9
Middle	45.0	44.9	53.3	44.1	51.7	42.4
Upper	29.3	29.3	40.0	30.0	37.9	31.6
Unknown	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

\*New Tripoli is not a CRA reporter and only a sample of loans was used for evaluation in 2015 and 2016.

### **Lending in Low-Income Census Tracts**

Overall, New Tripoli’s small business lending in low-income tracts is poor. Based on a sample of small business loans originated by the bank in its assessment area, New Tripoli made no small business loans in low-income census tracts in either 2015 or 2016, despite the fact that 8% of assessment area businesses were located in low-income tracts. Aggregate lenders originated 8% of small business loans in low-income tracts in 2015, and 7% of small business loans in low-income tracts in 2016, which is very similar to the demographic proxy.

### **Lending in Moderate-Income Census Tracts**

New Tripoli’s small business lending in moderate-income tracts is poor. Data for 2015 shows that New Tripoli originated 7% of small business loans (one loan) in the assessment area’s moderate-income census tracts, compared to the proxy of 18% of businesses in moderate-income tracts, and aggregate lending of 17% of loans in moderate-income tracts.

In 2016, small business lending in moderate-income tracts was poor. New Tripoli originated 10% of small business loans (three loans) in the assessment area’s moderate-income census tracts, compared to the proxy of 18% of businesses in moderate-income tracts and aggregate lending of 18% of small business loans in moderate-income tracts.

It is recognized that there are few low- or moderate-income census tracts directly surrounding New Tripoli’s two branches, and that there is intense competition from larger national and superregional banks, many of whom operate under corporate credit card agreements, which may inflate aggregate small business performance.

### **Response to Substantiated Complaints**

No CRA complaints were filed with the bank or the Federal Reserve Bank of Philadelphia during the evaluation period, and therefore this component of the lending test was not evaluated.

## **COMMUNITY DEVELOPMENT TEST**

New Tripoli's performance under the community development test is rated satisfactory. The bank's mix of community development loans, investments and services demonstrates adequate responsiveness to the needs of the Allentown assessment area, considering the bank's capacity and the availability of community development opportunities for banks to participate in.

### **Community Development Loans**

During the examination period, New Tripoli originated nine community development loans totaling over \$6.3 million. Seven of the nine loans financed 162 units of affordable rental housing in low- and moderate-income census tracts in Allentown and Whitehall, while two of the loans were to revitalize or stabilize low- and moderate-income tracts in Allentown and Whitehall.

Of the total community development loan dollars extended by the bank, \$5.7 million or almost 91%, supported affordable housing, while \$600 thousand, or 9%, promoted revitalization and stabilization activities in the assessment area.

The dollar value of New Tripoli's community development lending is significantly higher during this CRA evaluation period than during the prior evaluation period, when community development lending totaled just over \$1.1 million.

### **Community Development Investments**

New Tripoli's qualified community development investments during the evaluation period totaled \$1.76 million. The bank's qualified investments include over \$1.6 million in municipal bonds issued by two municipalities in the bank's assessment area. The total amount is comprised of a \$505 thousand bond to the Borough of Catasauqua, where according to Pennsylvania Department of Education statistics for 2016, 54% of area children receive free or reduced lunches, and a \$1.1 million bond to Whitehall-Coplay, where 53% of area children receive free or reduced lunches. The bonds are considered community development because of the concentration of low- and moderate-income residents in these areas, and the current fiscal environment for the local governments. The proceeds of both investments help to revitalize and stabilize the areas by financing necessary sewer system improvements.

The bank also made a \$15 thousand investment in the Housing Association and Development Corporation (HADC) of Allentown, PA. HADC is a nonprofit community development agency which provides affordable housing for low- and moderate-income individuals and families in Allentown. The investment includes a \$10 thousand prior-period investment which is still outstanding, and new monies of just over \$5 thousand, which were committed by the bank in 2016 and 2017.

Other investments include \$1,500 to the Lehigh Valley Community Land Trust (LVCLT) and \$2,000 to Lehigh Valley Economic Development Corporation (LVEDC). LVCLT is a non-profit providing permanent affordable housing in the Lehigh Valley by creating and preserving homes for working families by building or renovating homes and selling them to income-qualified applicants. Land is held in a community land trust to maintain affordability. LVEDC focuses on economic development in the Lehigh Valley by attracting employers and creating new jobs in the Lehigh Valley.

Finally, New Tripoli made almost \$108 thousand in qualified donations to local organizations that serve low- and moderate-income people and areas, and small businesses.

### **Community Development Services**

New Tripoli provided community development services in its assessment area. Bank officers, board members and employees serve in various capacities on the boards of community organizations, providing technical expertise through participation on the board of directors and on various leadership committees. Noteworthy examples of the bank's participation with community development organizations include the following community service activities:

- Three members of the board of directors serve as committee members on three nonprofit organizations specializing in housing, and support services for low- and moderate-income residents of Allentown;
- A bank officer serves on the board of directors of HADC, an affordable housing developer in the city of Allentown; and
- A board member serves on the board of the Rising Tide Community Loan Fund, an organization that identifies and address the credit needs of start-ups and other small businesses whose risk factors prevent them from qualifying for traditional small business credit products.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES**

New Tripoli 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: 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;
- (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; or
- (5) Loans, investments, and services that-
  - (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
  - (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
  - (iii) Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**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 refinancings 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 B: HMDA LOAN DISTRIBUTION TABLES**

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

**2014 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	4	4.1%	317	1.7%	5	5.2%	295	1.6%
Moderate	4	4.1%	209	1.1%	17	17.5%	2,333	12.7%
Middle	37	38.1%	6,470	35.3%	14	14.4%	1,990	10.8%
Upper	52	53.6%	11,346	61.9%	58	59.8%	13,050	71.1%
Unknown	0	0.0%	0	0.0%	3	3.1%	674	3.7%
<b>Total</b>	<b>97</b>	<b>100.0%</b>	<b>18,342</b>	<b>100.0%</b>	<b>97</b>	<b>100.0%</b>	<b>18,342</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	3	6.0%	211	2.7%
Moderate	1	2.0%	135	1.7%	9	18.0%	642	8.1%
Middle	29	58.0%	5,352	67.5%	12	24.0%	1,977	24.9%
Upper	20	40.0%	2,444	30.8%	23	46.0%	3,651	46.0%
Unknown	0	0.0%	0	0.0%	3	6.0%	1,450	18.3%
<b>Total</b>	<b>50</b>	<b>100.0%</b>	<b>7,931</b>	<b>100.0%</b>	<b>50</b>	<b>100.0%</b>	<b>7,931</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	1	2.4%	325	8.8%	5	12.2%	329	9.0%
Moderate	2	4.9%	240	6.5%	4	9.8%	292	7.9%
Middle	16	39.0%	1,506	41.0%	12	29.3%	881	24.0%
Upper	22	53.7%	1,603	43.6%	19	46.3%	1,847	50.3%
Unknown	0	0.0%	0	0.0%	1	2.4%	325	8.8%
<b>Total</b>	<b>41</b>	<b>100.0%</b>	<b>3,674</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>3,674</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
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	2	100.0%	231	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%	2	100.0%	231	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>231</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>231</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	5	2.6%	642	2.1%	13	6.8%	835	2.8%
Moderate	7	3.7%	584	1.9%	30	15.8%	3,267	10.8%
Middle	84	44.2%	13,559	44.9%	38	20.0%	4,848	16.1%
Upper	94	49.5%	15,393	51.0%	100	52.6%	18,548	61.5%
Unknown	0	0.0%	0	0.0%	9	4.7%	2,680	8.9%
<b>Total</b>	<b>190</b>	<b>100.0%</b>	<b>30,178</b>	<b>100.0%</b>	<b>190</b>	<b>100.0%</b>	<b>30,178</b>	<b>100.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

**2015 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	1	1.5%	20	0.2%	0	0.0%	0	0.0%
Moderate	1	1.5%	71	0.5%	10	15.2%	1,569	12.1%
Middle	35	53.0%	6,746	52.0%	9	13.6%	1,791	13.8%
Upper	29	43.9%	6,143	47.3%	43	65.2%	9,363	72.1%
Unknown	0	0.0%	0	0.0%	4	6.1%	257	2.0%
<b>Total</b>	<b>66</b>	<b>100.0%</b>	<b>12,980</b>	<b>100.0%</b>	<b>66</b>	<b>100.0%</b>	<b>12,980</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	1	2.5%	37	0.5%	4	10.0%	145	2.1%
Moderate	1	2.5%	50	0.7%	9	22.5%	828	12.0%
Middle	18	45.0%	3,744	54.2%	2	5.0%	355	5.1%
Upper	20	50.0%	3,078	44.6%	24	60.0%	5,445	78.8%
Unknown	0	0.0%	0	0.0%	1	2.5%	136	2.0%
<b>Total</b>	<b>40</b>	<b>100.0%</b>	<b>6,909</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>6,909</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	6.5%	33	1.0%	11	35.5%	544	16.6%
Middle	15	48.4%	1,830	55.7%	6	19.4%	341	10.4%
Upper	14	45.2%	1,420	43.3%	13	41.9%	2,188	66.6%
Unknown	0	0.0%	0	0.0%	1	3.2%	210	6.4%
<b>Total</b>	<b>31</b>	<b>100.0%</b>	<b>3,283</b>	<b>100.0%</b>	<b>31</b>	<b>100.0%</b>	<b>3,283</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
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%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>HMDA Totals</b>							
Low	2	1.5%	57	0.2%	4	2.9%	145	0.6%
Moderate	4	2.9%	154	0.7%	30	21.9%	2,941	12.7%
Middle	68	49.6%	12,320	53.2%	17	12.4%	2,487	10.7%
Upper	63	46.0%	10,641	45.9%	80	58.4%	16,996	73.3%
Unknown	0	0.0%	0	0.0%	6	4.4%	603	2.6%
<b>Total</b>	<b>137</b>	<b>100.0%</b>	<b>23,172</b>	<b>100.0%</b>	<b>137</b>	<b>100.0%</b>	<b>23,172</b>	<b>100.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

**2016 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	1	1.3%	340	2.4%	7	8.9%	684	4.8%
Moderate	4	5.1%	254	1.8%	15	19.0%	1,765	12.3%
Middle	39	49.4%	6,995	48.8%	20	25.3%	3,509	24.5%
Upper	35	44.3%	6,759	47.1%	33	41.8%	7,577	52.8%
Unknown	0	0.0%	0	0.0%	4	5.1%	813	5.7%
<b>Total</b>	<b>79</b>	<b>100.0%</b>	<b>14,348</b>	<b>100.0%</b>	<b>79</b>	<b>100.0%</b>	<b>14,348</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	4	9.1%	538	5.9%
Moderate	3	6.8%	490	5.3%	5	11.4%	572	6.2%
Middle	25	56.8%	5,141	56.0%	11	25.0%	1,317	14.3%
Upper	16	36.4%	3,551	38.7%	22	50.0%	6,057	66.0%
Unknown	0	0.0%	0	0.0%	2	4.5%	698	7.6%
<b>Total</b>	<b>44</b>	<b>100.0%</b>	<b>9,182</b>	<b>100.0%</b>	<b>44</b>	<b>100.0%</b>	<b>9,182</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	4	9.8%	128	2.7%
Moderate	3	7.3%	83	1.7%	7	17.1%	249	5.2%
Middle	20	48.8%	2,820	58.8%	13	31.7%	1,496	31.2%
Upper	18	43.9%	1,891	39.4%	14	34.1%	2,823	58.9%
Unknown	0	0.0%	0	0.0%	3	7.3%	98	2.0%
<b>Total</b>	<b>41</b>	<b>100.0%</b>	<b>4,794</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>4,794</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	40.0%	503	24.0%	0	0.0%	0	0.0%
Middle	2	40.0%	1,045	49.8%	0	0.0%	0	0.0%
Upper	1	20.0%	550	26.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	2,098	100.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>2,098</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>2,098</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	1	0.6%	340	1.1%	15	8.9%	1,350	4.4%
Moderate	12	7.1%	1,330	4.4%	27	16.0%	2,586	8.5%
Middle	86	50.9%	16,001	52.6%	44	26.0%	6,322	20.8%
Upper	70	41.4%	12,751	41.9%	69	40.8%	16,457	54.1%
Unknown	0	0.0%	0	0.0%	14	8.3%	3,707	12.2%
<b>Total</b>	<b>169</b>	<b>100.0%</b>	<b>30,422</b>	<b>100.0%</b>	<b>169</b>	<b>100.0%</b>	<b>30,422</b>	<b>100.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

**2017 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	2	2.1%	260	1.5%	4	4.3%	430	2.4%
Moderate	2	2.1%	402	2.3%	9	9.6%	1,572	8.9%
Middle	52	55.3%	8,053	45.4%	24	25.5%	3,832	21.6%
Upper	38	40.4%	9,018	50.9%	44	46.8%	9,493	53.5%
Unknown	0	0.0%	0	0.0%	13	13.8%	2,406	13.6%
<b>Total</b>	<b>94</b>	<b>100.0%</b>	<b>17,733</b>	<b>100.0%</b>	<b>94</b>	<b>100.0%</b>	<b>17,733</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	1	2.3%	133	1.6%	3	7.0%	368	4.3%
Moderate	0	0.0%	0	0.0%	8	18.6%	1,512	17.6%
Middle	19	44.2%	4,193	48.9%	11	25.6%	1,792	20.9%
Upper	23	53.5%	4,253	49.6%	16	37.2%	4,309	50.2%
Unknown	0	0.0%	0	0.0%	5	11.6%	598	7.0%
<b>Total</b>	<b>43</b>	<b>100.0%</b>	<b>8,579</b>	<b>100.0%</b>	<b>43</b>	<b>100.0%</b>	<b>8,579</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	3	9.4%	130	4.3%
Moderate	0	0.0%	0	0.0%	7	21.9%	303	10.1%
Middle	19	59.4%	1,579	52.4%	8	25.0%	536	17.8%
Upper	13	40.6%	1,434	47.6%	8	25.0%	1,292	42.9%
Unknown	0	0.0%	0	0.0%	6	18.8%	752	25.0%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>3,013</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>3,013</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	600	26.9%	0	0.0%	0	0.0%
Middle	4	80.0%	1,630	73.1%	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%	5	100.0%	2,230	100.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>2,230</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>2,230</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	3	1.7%	393	1.2%	10	5.7%	928	2.9%
Moderate	3	1.7%	1,002	3.2%	24	13.8%	3,387	10.7%
Middle	94	54.0%	15,455	49.0%	43	24.7%	6,160	19.5%
Upper	74	42.5%	14,705	46.6%	68	39.1%	15,094	47.8%
Unknown	0	0.0%	0	0.0%	29	16.7%	5,986	19.0%
<b>Total</b>	<b>174</b>	<b>100.0%</b>	<b>31,555</b>	<b>100.0%</b>	<b>174</b>	<b>100.0%</b>	<b>31,555</b>	<b>100.0%</b>

**CRA APPENDIX C: SMALL BUSINESS LOAN DISTRIBUTION TABLES**

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

**2015 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN ASSESSMENT AREA)**

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.7%	12	0.6%	0	0.0%	0	0.0%
Middle	8	53.3%	1,079	50.6%	0	0.0%	0	0.0%
Upper	6	40.0%	1,042	48.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>2,134</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>							
Total \$1 Million or Less	15	100.0%	2,134	100.0%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>2,134</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Loan Size</b>							
\$100,000 or less	12	80.0%	579	27.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	3	20.0%	1,555	72.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>2,134</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	12	80.0%	579	27.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	3	20.0%	1,555	72.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>2,134</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

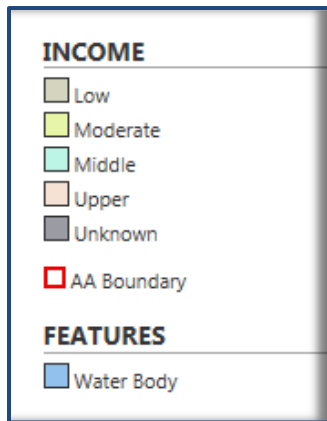
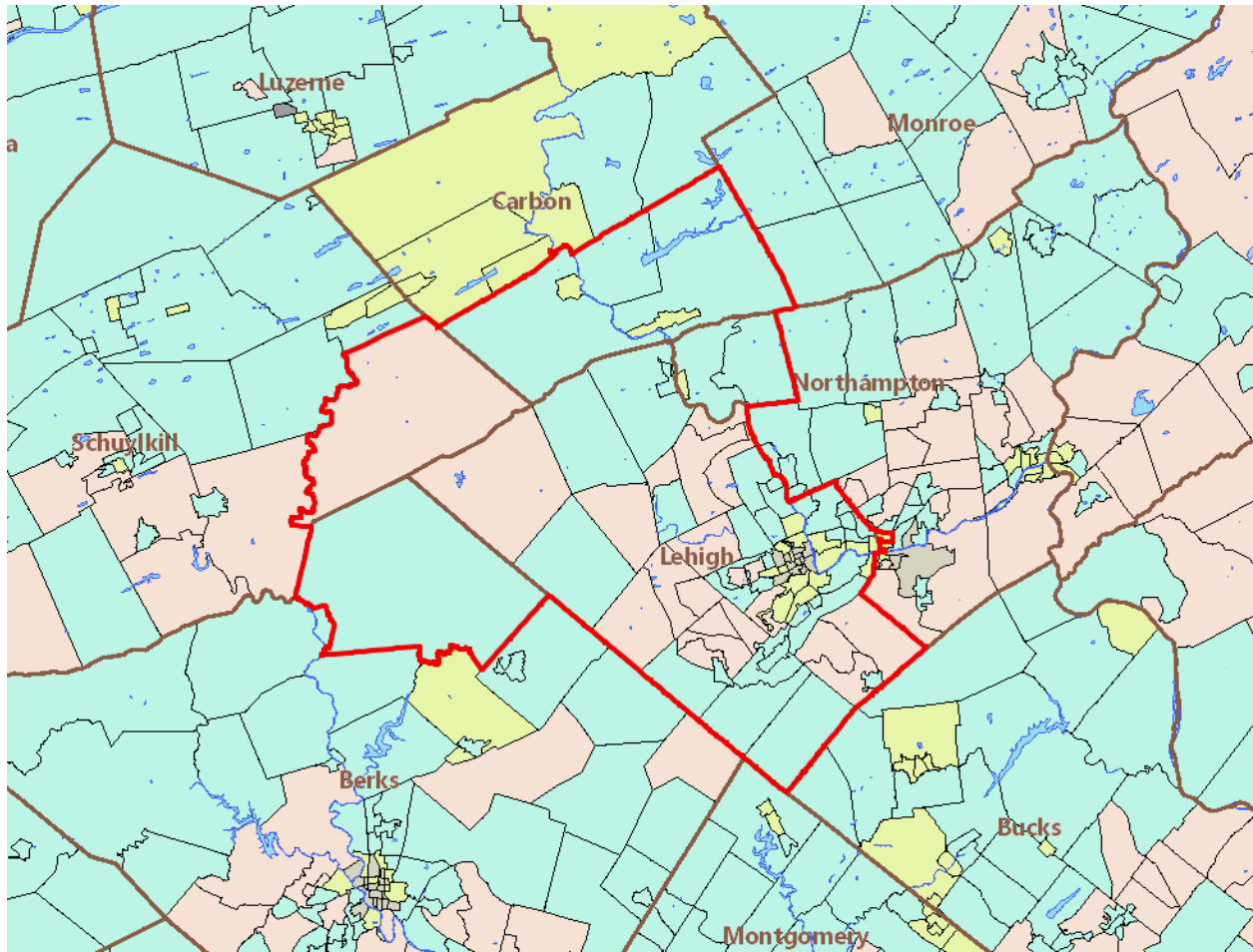
**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
FEBRUARY 2018**

**2016 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN ASSESSMENT AREA)**

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	10.3%	489	13.3%	0	0.0%	0	0.0%
Middle	15	51.7%	1,590	43.1%	0	0.0%	0	0.0%
Upper	11	37.9%	1,612	43.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>3,690</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Revenue</b>							
Total \$1 Million or Less	29	100.0%	3,690	100.0%	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>3,690</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Loan Size</b>							
\$100,000 or less	17	58.6%	898	24.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	10	34.5%	1,968	53.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	2	6.9%	825	22.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>3,690</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>By Loan Size and Revenue \$1 Million or Less</b>							
\$100,000 or less	17	58.6%	898	24.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	10	34.5%	1,968	53.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)- \$500k (Farm)	2	6.9%	825	22.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus) -\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>29</b>	<b>100.0%</b>	<b>3,690</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**CRA APPENDIX D: ASSESSMENT AREA MAPS**

ASSESSMENT AREA MAP (2010 CENSUS DATA)



ASSESSMENT AREA MAP (2015 ACS DATA)

