

PUBLIC DISCLOSURE

Date of Evaluation: August 5, 1996

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Name of Depository Institution:
LAUREL BANK

Institution's Identification Number:

Address: 111 WEST HIGH STREET

EBENSBERG, PENNSYLVANIA 15931-1538

FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PA 19106

GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Laurel Bank** by the Federal Reserve Bank of Philadelphia, the institution's supervisory agency.

The evaluation represents the agency's current assessment and rating of the institution's CRA performance based on an examination conducted as of **August 5, 1996**. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after that date.

The purpose of the Community Reinvestment Act of 1977 (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall: (1) assess the institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution, and; (2) take that record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub.L.No.101-73, amended the CRA to require the Agencies to make public certain portions of their CRA performance assessments of financial institutions.

Basis for the Rating

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors,

which are grouped together under 4 performance categories, as detailed in the following section of this evaluation.

ASSIGNMENT OF RATING

Identification of Possible Ratings

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance in meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

DISCUSSION OF INSTITUTION'S PERFORMANCE

INSTITUTION'S RATING:

This institution is rated **Satisfactory** based on the findings presented below:

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

Assessment Factor A - Activities conducted by the institution to ascertain the credit needs of its community, including the extent of the institution's efforts to communicate with members of its community regarding the credit services being provided by the institution.

Conclusion/Support

LB's community encompasses several relatively small municipalities, which are characterized as stable to economically depressed. Based upon U.S. Census data, the community's population includes many older lower income individuals. Given the relatively small size of the aforementioned municipalities, coupled with the fact that many residents are personally known to bank employees, the bank is able to service the area well.

LB's management continues to encourage bank employees to actively participate in various community activities and community development initiatives. Such participation facilitates ongoing assessment of community credit needs, which, in turn, is integrated into product development. Moreover, the bank maintains ongoing dialogue with several community entities in an effort to solicit relevant input regarding local development and revitalization issues. Such entities are listed below.

- ! The Cambria County Industrial Development Corporation
- ! Blair County Community Action Program
- ! Indiana County Office of Planning and Development
- ! The Small Business Development Center.
- ! Blair County Chamber of Commerce
- ! Indiana County Chamber of Commerce
- ! Cresson Area Chamber of Commerce
- ! Downtown Indiana Business Association
- ! Cambria-Somerset Board of Realtors
- ! Southern Allegheny Planning & Development Commission
- ! Northern Cambria County Development Corporation

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS (continued)

Assessment Factor C - The extent of participation by the institution's board of directors in formulating the institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

Conclusion/Support

BT Financial provides meaningful assistance in overseeing CRA related activities. The parent company established a CRA Task Force in 1989 to encourage, guide, and direct all of its subsidiary banks' efforts. The Task Force is also utilized to develop CRA policies and the CRA statement, to plan strategies for community interaction and/or special programs, and to assist with the submission of CRA recommendations to senior management. This committee meets on a quarterly basis and is comprised of holding company representatives and members from each subsidiary CRA Committee. The CRA Task Force also provides a centralized location for the allocation of resources and management to meet the overall goals and objectives of each subsidiary institution.

LB's CRA Committee was established in 1993 and was developed to guide and supervise the CRA activities of the bank. The committee is comprised of eight bank officers who meet quarterly. The committee meeting minutes reflect a proactive attitude toward the bank's CRA program with the apparent goal being to achieve an effective outreach program and maintain employee involvement at all levels of the bank. A review of the minutes revealed the following:

- ! Discussion of all CRA-related calls.
- ! Consideration of new deposit and loan products, including a low volume checking product and the Community Development Mortgage Program; and,
- ! Frequent discussions regarding the bank's CRA policies, procedures, and training.

Like other affiliates of BT Financial, LB's directors remain cognizant of the bank's CRA initiatives and activities, although much of the bank's CRA planning is performed at the holding company. Nevertheless, minutes of directors meetings indicate that CRA performance is incorporated into the bank's ongoing strategic planning.

II. **MARKETING AND TYPES OF CREDIT EXTENDED**

Assessment Factor B - The extent of the institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the institution.

Conclusion/Support

LB'S CRA statement contains information regarding the bank's efforts to both assess community credit needs and provide appropriate products and services to address same. Specifically, the CRA statement offers the following credit products:

Consumer Loans

- ! Unsecured personal loans
- ! Secured loans
 - Automobile
 - Mobile home
 - Recreational vehicle
 - Savings accounts/certificate of deposit
 - Marketable securities
 - Cash surrender value of life insurance
 - Home improvement
 - Home equity
- ! PHEAA student loans
- ! MasterCard and VISA credit cards
- ! Revolving credit (Laurel Cash Reserve)

Mortgage Loans

- ! First liens on principle residence
- ! Privately insured mortgages on 1-4 unit structures
- ! Community development mortgages

Commercial Loans

- ! Short-term unsecured loans to businesses and individuals
- ! Business loans guaranteed by the SBA or by another federal, state, or local agency
- ! Secured loans
 - Inventory
 - Accounts Receivable
 - Machinery and equipment
 - Marketable securities
 - Savings accounts and certificates of deposit
 - First liens on business or residential real estate
 - Cash surrender value of life insurance
- ! Letters of credit
- ! Multi-family construction loans
- ! Industrial development loans

Additionally, LB utilizes a variety of media to promote its products and services, including radio, television, newspapers, direct mail, pamphlets, and various free publications. The bank's advertising is essentially retail oriented, and targeted toward a variety of audiences. LB places radio advertisements with local stations featuring several different listening formats, including country-western, adult contemporary, news, information, weather and sports. The bank also utilizes three different print medium that reach its community's low- to moderate-income segments. Generally, LB's advertisements are internally reviewed for compliance with all applicable laws and regulations by its marketing department and BT Financial's corporate compliance officer.

As noted at the previous examination, LB began offering home mortgage credit products, targeted at its community's low- to moderate-income segments, through the product development and marketing efforts of its parent, BT Financial. As such, the bank, together with BT Financial's two other banking affiliates continues to offer two loan products via BT Financial's Community Development Loan Programs (i.e. (Community Development Mortgage Product (CDMP) and Community Development Home Improvement Product (CDHIP)). LB's management continues to promote both products through local realtors, while monitoring area real estate Multiple Listing Services (MLS) to identify properties in low- to moderate-income geographies that qualify for such finance. Moreover, the bank continues to provide representatives to accept mortgage applications at realtors' offices to facilitate promotion of the two products.

As a consolidated marketing effort, BT Financial engaged in a direct mail campaign, between examinations, to promote its CDMP and CDHIP products at each of its three subsidiary banks. Additionally, BT Financial, on behalf of its three banks, purchased automated tool in an effort to effectively increase market share in various geographies throughout each of its bank's communities.

Assessment Factor I - The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans and small business or small farm loans within its community, or the purchase of such loans originated in its community.

Conclusion/Support

The bank's overall lending profile is presented quantitatively below:

LOAN TYPE	06/30/96	%	12/31/95	%	12/31/94	%
Consumer I/L Loans	70,114	30	73,137	31	76,817	34
Home Mortgage Loans	35,912	28	67,507	29	54,631	24
Commercial & Industrial Loans	30,697	23	48,441	20	55,220	24
Commercial & Multi-Family Real Estate Loans	565	13	30,872	13	30,556	13
Real Estate Construct. Loans	1,493	3	8,906	4	4,884	2
Open-end Home Equity Credit	6,137	3	6,439	3	6,619	3
Total	245,613	100	235,302	100	228,727	100

LB's lending profile remains retail-oriented, with the bulk of the portfolio concentrated in home mortgage and consumer installment credit. Notwithstanding such retail orientation, the bank continues to originate a considerable volume of commercial and industrial loans.

With respect to home mortgage credit, LB received 261 home mortgage applications during 1995, from which 193 loans were originated, aggregating \$69.0 million. In 1994, 323 applications were received, resulting in 241 originations that totaled \$67.0 million. Loan denial rates for both years remain comparatively high, at and for 1995 and 1994, respectively. Management attributes such historically high denial rates to the substantial volume of indirect mobile home finance that the bank entertains.

Notwithstanding the high denial rates, management maintains that LB continues to serve many low- to moderate-income individuals, both within and outside of the bank's community, through its mobile home lending program. Since 1990, this program has more than doubled in size from net outstandings of \$4 million to \$11 million to date, representing 654 loans. This program is actively marketed through the bank's lending officers in concert with approved mobile home dealers.

Further details of LB's home mortgage lending in 1995 and 1994, based on applicable HMDA/LAR data, are presented in the charts below:

1995 Mortgage Lending Activity

	Applications #/\$		Originations #/\$		Denials #/\$		Withdrawn #/\$	
Conventional	339	42.4	312	39.1	6	0.5	13	2.8
Refinance	198	26.4	190	25.5	0	0.0	8	0.9
Home Improv.	120	3.1	120	3.1	0	0.0	0	0.0
TOTAL	657	71.9	622	67.7	6	0.5	21	3.7

(Dollars in Millions)

1994 Mortgage Lending Activity

	Applications #/\$		Originations #/\$		Denials #/\$		Withdrawn #/\$	
Conventional	254	31.5	236	29.2	3	0.5	15	1.7
Refinance	254	27.3	233	24.6	6	0.8	15	1.9
Home Improv.	207	5.0	190	4.7	12	0.2	5	0.2
TOTAL	715	63.8	644	58.5	21	1.5	35	3.8

(Dollars in Millions)

LB has offered the CBMP and CDHIP products since May 1994; however, despite persistent marketing efforts, the community's response to this product remains minimal. Since its inception, the bank has originated only three loans. Given such limited response, management is currently considering development of yet additional products targeted at low- to moderate-income individuals seeking to finance properties not located in low- to moderate-income geographies.

Assessment Factor J - The institution's participation in governmentally-insured, guaranteed or subsidized loan programs for housing, small businesses or small farms.

Conclusion/Support

LB continues to participate with five other local institutions in a consortium known as The Indiana County Community Program for Restoration of Affordable Home Ownership (the Route 119 South Corridor Project). The program is a home purchase/rehabilitation initiative designated to serve Indiana County. The program's primary objective is to avail affordable housing opportunities to low- to moderate-income families, preserve existing housing stock, stimulate the construction of new affordable housing, eliminate vacant and vandalized housing, and promote fair and equal housing opportunities for all residents of Indiana County.

Additionally, the bank continues to participate in the Blair County Rehabilitation Program. This housing rehabilitation program provides small below-market interest rate loans in conjunction with approved grants.

As already noted, LB continues to originate a considerable volume of commercial and industrial loans. Conversely, management offers a variety of commercial loan products to meet business credit needs within its community. Since the previous examination, several commercial loans have

been made which evidence the bank's commitment to serve their local community. Additional information regarding some of these loan is discussed under Community Development.

LB continues to participate in loan programs sponsored by the U.S. Small Business Administration (SBA); however, to date, the origination of such credit remains insignificant. As of December 31, 1995, the bank had \$28,900 outstanding and commitments to fund an additional \$253,000. Nevertheless, LB's volume of loans extended to small business, as reported in its call report supplement and summarized below, remains substantial.

The bank offers Pennsylvania Higher Education Assistance Agency (PHEAA) state guaranteed loans. PHEAA loans outstanding as of year-end 1993 totaled \$3.6 million and as of year-end 1995 totaled \$4.4 million. Actual new loan volume originated in 1995 was \$2.7 million.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Reasonableness of Delineated Community

Conclusion/Support

Laurel Bank (LB), headquartered in Ebensburg, Pennsylvania, is a wholly-owned subsidiary bank of BT Financial Corporation (BT Financial), which reported total consolidated assets of \$1.2 million at December 31, 1995. As a multi-bank entity, BT Financial operates with two other wholly owned bank subsidiary banks; Johnstown Bank and Trust Company, (the lead bank), based in Johnstown, Pennsylvania; and Fayette bank, based in Uniontown, Pennsylvania, which is in Fayette County and located in the Fourth Federal Reserve District. For purposes of CRA and overall marketing strategy, BT Financial has identified a considerable portion of southwestern Pennsylvania as its consolidated service area.

LB's community, as currently delineated for purposes of CRA, consists of all of Blair County, approximately 80% of Indiana County (exclusive of the northern portion), and approximately 80% of Cambria County, (exclusive of the southern portion). This delineation encompasses portions of the Altoona and Johnstown Metropolitan Statistical Areas (MSAs); Blair County is within the Altoona MSA, while Cambria County is within the Johnstown MSA. Indiana County is not within any MSA.

The community contains 52 census tracts; 36 within the Altoona MSA, and 16 within the Johnstown MSA; together with several census block numbering areas (BNA's) in Indiana County. Five of the geographies within the community, all located within a pocket of Altoona in Blair County, are designated as low- to moderate-income based on 1990 U.S. Census data. Although none of LB's fourteen offices are located in low- to moderate-income geographies, three are proximate to the aforementioned geographies.

The population of LB's community is comprised as follows:

	Number	Percent
Market Population		%
L/M Income Population		%
Middle Income Population		%
Upper Income Population		%
Minority Population		%
L/M, Minority Population		%

(L/M designates low- to moderate-income)

Assessment Factor E - The geographic distribution of the institution's credit extensions, credit applications and credit denials.

Conclusion/Support

In an effort to analyze the disposition of both originated and denied loans and the penetration levels for low- to moderate-income areas, an analysis was conducted on all loan types sampled during the examination for the 12 months ended December 31, 1995. Additionally, the 1995 HMDA report and preliminary 1996 Loan Application Register (LAR) data were reviewed. The following charts depict the analysis. (L/M denotes low- to moderate-income census tracts.)

<u>Total Applications Sampled:</u>	215	----
Applications received from within delineation	132	61.4%
Applications received from outside delineation	76	35.3%
Applications received which could not be identified	7	3.3%
Applications received from L/M within delineation	13	6.0%

<u>Total Approved Loans Sampled:</u>	49	----
Approved loans within delineation	38	77.6%
Approved loans outside delineation	11	22.4%
Approved loans to L/M within delineation	3	6.1%
<u>Total Denied Loans Sampled:</u>		166
Denied loans within delineation		94
Denied loans outside delineation		65
Denied loans which could not be identified	7	4.2%
Denied loans to L/M within delineation	10	6.0%

The above analysis indicates that 61.4% of the applicants sampled were received from applicants located within the bank's delineation. Six percent of these applications were from applicants in low- to moderate-income areas. An analysis of the total approved loans sampled and total denied loans sampled reflect similar percentages as those of the total applications sampled.

A review of the bank's 1995 Loan Application Register (LAR) revealed the following distribution. (L/M denotes low- to moderate-income census tracts.)

1995 HMDA DATA

Number of census tracts in the bank's community		----
Number of tracts reported		40
		77.0%
Number of L/M tracts in bank's community	5	----
Number of L/M tracts reported	2	40.0%
Number of minority tracts in bank's community	0	----
<u>Total Applications Received:</u>	837	----
Applications received from within delineation	361	43.0%
Applications received from outside delineation	476	57.0%
Applications received from L/M within delineation	4	.5%
<u>Total Approved Loans:</u>		522
Approved loans within delineation	289	55.4%
Approved loans outside delineation	233	44.6%

Approved loans to L/M within delineation	4	.8%
--	---	-----

Approval/Denial Rates

<u>Total Applications Received:</u>	837	----
Total Approved	522	62.4%
Total Denied	302	36.1%
Total Withdrawn	11	1.3%
Total Incomplete	2	.2%
 <u>Total Low/Moderate Income Applications:</u>	 423	 ----
Total Approved	207	49.0%
Total Denied	207	49.0%
Total Withdrawn	7	1.6%
Total Incomplete	2	.4%
 <u>Total Non Low/Moderate Income Applications:</u>	 414	 ----
Total Approved	315	76.0%
Total Denied	95	23.0%
Total Withdrawn	4	1%
Total Incomplete	0	0%

As illustrated in the above chart, LB received a total of mortgage related applications in 1995. Many of the bank's applications emanated from Indiana County. Since Indiana County is not located in an MSA, the HMDA Analysis Reports available to the public reflect these applications as being outside of the delineation. Therefore, the percentage of applications originating from within the bank's delineation as depicted above, 43%, is significantly understated.

A review was conducted on the bank's preliminary 1996 HMDA data which included 632 LAR lines. The following chart depicts the analysis.

<u>Total Applications Received:</u>	632	----
Applications received from within delineation	324	51%
Applications received from L/M within delineation	7	1%
Applications received from outside delineation	44	7%
Applications received from census tracts identified as N/A	257	41%

As illustrated above, 51% of the applications were received from within the bank's delineation, of which 1% was received from low-to moderate-income census tracts. Again the fact that Indiana County is not located in an MSA accounts for the majority of the 41% identified as N/A. As a result, the percentage of applications received from within the bank's delineation is

substantially higher than exhibited above.

As previously mentioned, five low- to moderate-income tracts are located within the bank's delineated service area. Only four applications were received from these census tracts in 1995. Accordingly, management plans to introduce an additional home mortgage product targeted at low- to moderate-income residents seeking to finance properties in geographies not designated as low- to moderate-income.

Since the previous examination, bank management has monitored and reviewed the geographic distribution of its credit extensions, applications, and denials. A summary of such review is presented in the table below.

Assessment Factor G - The institution's record of opening and closing offices and providing services at offices.

Conclusion/Support

LB operates 14 full service banking offices within Blair, Cambria, and Indiana counties in western Pennsylvania. The bank's offices are reasonably accessible to all segments of its delineated community. LB also maintains eight automated teller machines (ATM) and is a member of the Money Access Card (MAC) system.

LB maintains a branch office closing policy in accordance with the guidelines established by the Board of Governors of the Federal Reserve System. The policy sets forth the criteria to be followed in the event of a branch closing. The bank has not closed any offices since the previous examination.

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

Assessment Factor D - Any practices intended to discourage applications for the types of credit set forth in the institution's CRA Statement(s).

Conclusion/Support

The examination did not uncover any acts which would suggest that the bank discourages applicants from applying for those loan products or other financial services listed in its CRA Statement. Furthermore, a review of the bank's credit policies revealed no evidence of prohibited discriminatory practices such as prescreening or the discouragement of applications, although the recommendation for more guidance in the loan policy regarding the bank's consumer loans continues.

LB continues to utilize the Loan Declination Review Committee which is comprised of various bank officers. According to management, the committee meets monthly and performs a second review of randomly selected declined loan applications. The review of the committee minutes revealed applicants are occasionally reconsidered for credit or referred to credit counseling services.

All bank employees receive periodic training regarding their responsibilities under CRA and applicable fair lending regulations. There were no consumer complaints filed with this regulatory agency as of this examination date. Additionally, the bank is not currently engaged in any litigation related to credit statutes.

Assessment Factor F - Evidence of prohibited discriminatory or other illegal credit practices.

Conclusion/Support

Based upon the geographic lending patterns noted in the Geographic Distribution section of this report, the bank generally solicits credit applications from all segments of its delineated community. The bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. However, violations of the technical requirements of Regulations B and C were disclosed during the examination. To address such deficiencies, management indicated that enhancements would be implemented to ensure that regulatory reporting and disclosure requirements are met.

V. COMMUNITY DEVELOPMENT

Assessment Factor H - The institution's participation, including investments, in local community development and redevelopment projects or programs.

Conclusion/Support

Bank involvement in various development and redevelopment projects is listed below:

- ! LB provided low-cost, tax free financing of \$100,000 to the Borough of Ebensburg to purchase and develop a vacant lot which revitalized not only the downtown commercial area but the entire community as well.
- ! The bank extended \$200,000 which was part of a multi-million dollar funding initiative with five other local banks. The purpose was for capital financing and working capital to establish and operate a new window manufacturing company in Indiana County. This transaction supported economic development in Indiana County by helping to create approximately 200 jobs in the area.

- ! LB participates in Community Program for Restoration and Home Ownership Program in Indiana County. The program is a home purchase/rehabilitation program designed to develop affordable housing opportunities for low- to moderate-income families, preserve existing housing stock, stimulate the construction of new affordable housing, eliminate vacant and vandalized housing, and promote fair and equal housing opportunities for all residents of Indiana County.
- ! The bank extended a \$45,000 Low-Doc Small Business Administration Loan to a local businessman for the purchase of a used truck to start a small business.
- ! LB approved a \$56,800 loan to a small real estate holding company for start-up costs.
- ! A \$98,000 loan was extended to a local publishing company to finance the purchase and renovation of a building in Ebensburg.
- ! A \$14,000 loan was extended to a local businessman to purchase equipment to reopen a local restaurant.

Assessment Factor K - The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions and other factors.

Conclusion/Support

LB's satisfactory financial condition facilitates an ability to address local economic and community credit needs. However, the bank is somewhat limited by the impact of the area's depressed economy. Over the past several years, the area has suffered a declining population due to the closing of local coal mines and steel mills. The failing industrial employment base has resulted in unemployment rates which are higher than both the national and state averages. The remaining employment base in the area is centered in trucking and warehousing, public utilities, transportation, and communications.

Indiana County has one of the highest unemployment rates in Pennsylvania. Statistics for 1994 released from the Pennsylvania Department of Labor and Industry revealed the Altoona MSA unemployment rate to be 6.6% compared to the state and national average of 5.9% and 5.4%, respectively. Statistics for the Johnstown MSA revealed unemployment as of 12/94 to be 8.3% compared to the state and national average of 5.9% and 5.4%, respectively.

Demographic information provided from the 1995 County and City Extra Annual Metro, City and County Data Book revealed median household income levels in the three county area to be approximately 20% to 25% lower than those of the state levels. Additionally, a large portion of the community's population consists of retired individuals established in the community who have limited credit needs.

Assessment Factor L - Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which the institution is helping to meet the credit needs of its entire community.

Conclusion/Support

Finally, LB continues to provide both a personal and financial commitment to various local organizations such as Housing Opportunities, Inc., Northern Cambria County Development Corporation (NORCAM), and the Pennsylvania Economy League. Additionally, several bank employees are board members of these organizations.

ADDITIONAL INFORMATION

NONE.