



PUBLIC DISCLOSURE

Date of Evaluation: MARCH 28, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Name of Depository Institution: FIRST CITIZENS COMMUNITY BANK

Institution's Identification Number: 978118

Address: 15 SOUTH MAIN STREET

MANSFIELD, PENNSYLVANIA

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

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

Table of Contents

INSTITUTION'S CRA RATING.....	1
OVERALL CRA RATING: SATISFACTORY	1
PERFORMANCE TEST RATINGS TABLE	1
SUMMARY OF MAJOR FACTORS SUPPORTING RATING	1
INSTITUTION	2
DESCRIPTION OF INSTITUTION	2
SCOPE OF EXAMINATION.....	5
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	8
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES	14
COMMONWEALTH OF PENNSYLVANIA	15
STATE RATING.....	15
SCOPE OF EXAMINATION.....	15
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	16
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	17
NORTHERN TIER, PA ASSESSMENT AREA (NON-MSA) / FULL-SCOPE REVIEW.....	18
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	18
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	27
LANCASTER, PA ASSESSMENT AREA / FULL-SCOPE REVIEW	42
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	42
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	49
LEBANON, PA ASSESSMENT AREA / LIMITED-SCOPE REVIEW	63
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	63
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	68
STATE COLLEGE, PA ASSESSMENT AREA / LIMITED-SCOPE REVIEW	72
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	72
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	78
CHESTER, PA / NEW CASTLE, DE MULTISTATE ASSESSMENT AREA / FULL-SCOPE REVIEW.....	82
CRA RATING	82
SCOPE OF EXAMINATION.....	82
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	83
STATE OF NEW YORK / ALLEGANY, NY ASSESSMENT AREA / FULL-SCOPE REVIEW.....	100
STATE RATING.....	100
SCOPE OF EXAMINATION.....	100
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	101
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	109

STATE OF DELAWARE / DOVER, DE ASSESSMENT AREA /	
FULL-SCOPE REVIEW.....	121
STATE RATING.....	121
SCOPE OF EXAMINATION.....	121
DESCRIPTION OF INSTITUTION'S OPERATIONS.....	122
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	126
 CRA APPENDICES.....	 137
CRA APPENDIX A: SCOPE OF EXAMINATION TABLE.....	138
CRA APPENDIX B: SUMMARY OF STATE RATINGS	139
CRA APPENDIX C: GLOSSARY.....	140
CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES	143
CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES	178
CRA APPENDIX F: ASSESSMENT AREA MAPS.....	196

INSTITUTION’S CRA RATING

INSTITUTION’S RATING: SATISFACTORY

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

PERFORMANCE TEST RATINGS TABLE

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

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

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- A high percentage of the bank’s loans were made inside its assessment areas;
- The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas;
- The bank has made an adequate level of community development loans;
- The bank has made an adequate level of qualified investments and donations; and
- The bank provides a relatively high level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

First Citizens was rated satisfactory at its previous CRA evaluation dated July 8, 2019, which used the Interagency Large Institution CRA Examination Procedures.

First Citizens is a state-chartered full-service commercial bank headquartered in Mansfield, Tioga County, Pennsylvania. The institution offers a variety of commercial and consumer banking services, through 30 branches and one loan production office (LPO). There are 26 branch offices located in the Northern Tier, Central, South Central, and Southeastern regions of Pennsylvania, three branches in Dover and New Castle Counties in Delaware, and one branch in Allegany County in New York. Of the bank's branches, none are located in low-income census tracts, and one (3%) is located in a moderate-income census tract. Twenty-five branches (81%) are located in middle-income tracts, four (13%) are located in upper-income tracts, and one (3%) is located in an unknown-income tract. First Citizens' LPO is in Winfield, Union County, PA, in a middle-income tract. Union County is not within the bank's assessment areas, but borders Centre County to the east.

The bank is the sole banking, and primary operating subsidiary of Citizens Financial Services, Inc., a bank holding company also located in Mansfield, Pennsylvania, with assets of \$2.0 billion as of September 30, 2021.

The table below details the locations of First Citizens' locations as of the CRA evaluation date.

First Citizens Community Bank Branch Locations			
Assessment Area	County	State	Number of Branches
Northern Tier, PA Assessment Area	Bradford, Clinton, Potter and Tioga, PA Counties	Pennsylvania	16
Lebanon, PA Assessment Area	Lebanon County, PA; three census tracts in Berks County, PA; and seven census tracts in Schuylkill County, PA	Pennsylvania	6
Allegany, NY Assessment Area	Allegany County, NY	New York	1
Lancaster, PA Assessment Area	Lancaster County, PA	Pennsylvania	2
State College, PA Assessment Area	Centre County, PA	Pennsylvania	1
Chester, PA / New Castle, DE Assessment Area	Chester County, PA; and New Castle County, DE	Pennsylvania and Delaware	3
Dover, DE Assessment Area	Kent County, DE	Delaware	1
Total Full-Service Branches			30
Winfield Ag & Mortgage LPO	Union County, PA	Pennsylvania	1
Total Loan Production Offices			1
TOTAL BRANCHES & LPOs			31

According to the Consolidated Reports of Condition and Income (Call Report), as of September 30, 2021, First Citizens reported \$2.0 billion in assets, of which over \$1.4 billion, or 71%, were loans.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

On a dollar volume basis, commercial loans (comprised of commercial mortgages and commercial and industrial loans) were the most significant credit product offered by the bank, and comprised \$520 million as of September 30, 2021, or 36% of the bank’s loan portfolio. Residential mortgage loans (comprised of closed-end and open-end loans secured by residential properties, and multifamily loans) represent the second largest segment of the bank’s loan portfolio at \$426 million, or 29%, of the bank’s total loan portfolio. Loans secured by farmland comprised the third greatest portion of the bank’s loan portfolio, at \$313 million (22%).

The composition of the bank’s loan portfolio as of September 30, 2021, is presented in the table below.

First Citizens Community Bank		
LOANS as of 09/30/2021	\$ (000s)	%
Loans Secured by Nonfarm Nonresidential properties (Commercial Mortgages)	432,782	29.9
Commercial and Industrial Loans	87,517	6.1
Secured by Farmland	313,196	21.7
Secured by Residential Properties (Closed-end)	325,180	22.5
Secured by Residential Properties (Open-end)	26,900	1.9
Secured by Multifamily Residential Properties	74,010	5.1
Construction & Land Development	68,408	4.7
Consumer Loans	31,698	2.2
Loans to Finance Agricultural Production & Other Loans to Farmers	33,658	2.3
States and Political Subdivisions	49,428	3.4
Other Loans	3,330	0.2
Other Leases	0	0.0
TOTAL LOANS	1,446,107	100.0

Small Business Loans

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report, as of September 30, 2021, indicates that over \$197 million (38%) of the bank’s outstanding commercial loans¹ were designated as small business loans. At the previous CRA evaluation, First Citizens’ outstanding commercial loan volume was \$273 million, of which \$138 million (51%) was designated as small business loans. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less, as detailed in the following table.

First Citizens Community Bank Small Business Loans		
	Amount Outstanding as of 09/30/2021 \$ (000s)	%
Loans with original amounts of \$100,000 or less	22,088	4.3
Loans with original amounts of \$100,001 through \$250,000	41,668	8.0
Loans with original amounts of \$250,001 to \$1 million	133,710	25.7
TOTAL SMALL BUSINESS LOANS	197,466	38.0
Loans with original amounts of more than \$1,000,000	322,833	62.0
TOTAL COMMERCIAL LOANS	520,299	100.0

¹ Commercial loans are comprised of loans secured by nonfarm, nonresidential properties, along with commercial and industrial loans.

The bank'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.

First Citizens was rated satisfactory at its previous CRA evaluation performed by the Federal Reserve Bank of Philadelphia dated July 8, 2019. The previous examination was performed using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors of the Federal Reserve System (Board of Governors).

DESCRIPTION OF ASSESSMENT AREAS

For purposes of CRA, First Citizens has designated seven assessment areas, as follows:

1. The Northern Tier, PA assessment area, a non-MSA area, consisting of the entirety of Bradford, Clinton, Potter, and Tioga Counties, located in nonmetropolitan areas of Pennsylvania;
2. The Lancaster, PA assessment area, consisting of the entirety of Lancaster County, Pennsylvania, which is coterminous with the Lancaster, PA Metropolitan Statistical Area (MSA);
3. The Lebanon, PA assessment area, consisting of the entirety of Lebanon County, which comprises the entire Lebanon, PA MSA; three census tracts in Berks County (portion of the Reading, PA MSA, which is synonymous with Berks County); and seven census tracts in Schuylkill County (portion of the Pottsville, PA MSA);
4. The State College, PA assessment area, consisting of the entirety of Centre County, Pennsylvania, which is conterminous with the State College PA, MSA;
5. The Chester, PA / New Castle, DE multistate assessment area, consisting of the entirety of Chester County, Pennsylvania (portion of the Montgomery-Bucks-Chester, PA Metropolitan Division (MD), and the entirety of New Castle County, Delaware (portion of the Wilmington, DE-MD-NJ MD. Both counties are a part of the larger Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA;
6. The Allegany, NY assessment area, a non-MSA area, which consists of the entirety of Allegany County, New York, which is located in a nonmetropolitan area of New York; and
7. The Dover, DE assessment area, consisting of the entirety of Kent County, Delaware, which is conterminous with the Dover, DE MSA.

The bank's assessment areas were determined to comply with the requirements of the CRA, and do not arbitrarily exclude low- or moderate-income census tracts.

The bank's assessment area has changed since the last examination, with the addition of both the Chester, PA / New Castle, DE multistate assessment area, and the Dover, DE assessment area, both in 2020. On April 17, 2020, First Citizens acquired MidCoast Community Bank, which added three branches in Delaware, one in Kent County, and two in New Castle County. Additionally, in November 2020, the bank opened a de novo branch in Chester County, Pennsylvania.

SCOPE OF EXAMINATION

The current evaluation of First Citizens' CRA performance covers the period from July 9, 2019, through March 28, 2022, and was conducted using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors.

Under the lending test, loan products evaluated included:

- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose "not applicable," collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank in calendar years 2018, 2019, and 2020²;
- Small business loans reported by the bank pursuant to the CRA for calendar years 2018, 2019, and 2020; and
- Other loans that qualified as community development loans during the entire evaluation period from July 9, 2019, through March 28, 2022.

Because the bank originated more HMDA loans, by both number and dollar volume, than small business loans, HMDA loans were generally given the most weight in determining First Citizens' overall rating, followed by small business loans. In total, within the bank's assessment areas, the bank originated 1,680 HMDA loans totaling nearly \$262 million, and 1,007 CRA small business loans totaling almost \$122 million over the evaluation period. Though HMDA loans were weighted more heavily than small business loans in most assessment areas, there were three exceptions. In the Lebanon, PA, Chester, PA / New Castle, DE, and Dover, DE assessment areas, HMDA and small business loans were weighted equally, as their number and dollar volumes were comparable. Additional details on these weighting decisions are contained in the assessment area discussions.

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

²In October 2015 and August 2017, through final rules that amended Regulation C, the Consumer Financial Protection Bureau (CFPB) modified: (1) the types of institutions that are subject to Regulation C (covered institutions); (2) the types of transactions that are subject to Regulation C (covered transactions); (3) the types of data that institutions are required to collect, record and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data. See 80 Fed. Reg. 66127 (October 28, 2015) (final rule); and 82 Fed. Reg. 43088 (September 13, 2017) (correction). The Board of Governors, along with other agencies, amended their regulations implementing the CRA to conform with the CFPB regulation changes. Of note, changes include the "home-mortgage loan" definition in the CRA regulations to mean a "closed-end mortgage loan" or an "open-end line of credit," as those terms are defined in, and that are not excluded transactions under, amended Regulation C. As a result, home improvement loans that are not secured by a dwelling, which were previously required to be reported under Regulation C, are no longer reportable transactions under HMDA; Home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the financial institution under Regulation C, are now covered transactions under HMDA; Also, "home equity loan" was deleted from the CRA definition of "consumer loan" because home equity loans are now included within the CRA definition of "home-mortgage loan."

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. 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 areas in which it operates. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of the 2015 American Community Survey (ACS) for loans originated in 2018, 2019, and 2020³. The distribution of HMDA loans to borrowers of different income levels was based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2015 ACS data in 2018, 2019, and 2020, unless otherwise noted.

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

To supplement economic, demographic and performance data, and to gain a better perspective on community credit needs, interviews were conducted with 12 community representatives during the course of the evaluation. Discussions were held with six community contacts focused on affordable housing, three involved in economic development, two community action agencies, and one involved in workforce development within the bank's assessment areas. More information about the contacts and the community development and credit needs identified by the contacts is available in the discussions of each assessment area.

For purposes of assessing the bank's overall CRA performance, greatest weight was given to the bank's performance in the Commonwealth of Pennsylvania. In reaching the statewide conclusions within the Commonwealth of Pennsylvania, greatest weight was given to the bank's performance in the Northern Tier, PA assessment area, followed by performance in the Lebanon, PA, State College, PA, and Lancaster, PA assessment areas, as detailed below.

The majority of the bank's operations and lending were in the Northern Tier, PA assessment area, and as a result, this assessment area was given the greatest weight in determining the CRA rating for the Commonwealth of Pennsylvania. Sixteen of the bank's 30 branches (53%) were located in this assessment area, and these branches generated 57% of the bank's total deposits. From a loan perspective, 63% of the bank's total loans by number and 50% by dollar volume were made within the Northern Tier, PA assessment area. A full-scope review was conducted in the Northern Tier, PA assessment area.

³In accordance with FFIEC policy, 2015 ACS data is used to analyze data starting in 2017 and thereafter.

The Lebanon, PA assessment area was evaluated using limited-scope review procedures, where performance was compared with that in the full-scope areas in the state to determine if it exceeded, was consistent with, or was below the performance in the full-scope areas. Though a limited-scope review was performed, the second greatest amount of weight was assigned to this assessment area in determining the bank's CRA rating in the Commonwealth, due to the relative importance of the assessment area to the bank's overall operations. During the evaluation period, the bank operated six branches (20%) within the assessment area, and these branches generated 21% of deposits. From a loan standpoint, nearly 17% of total loans by number and dollar volume were made within the Lebanon, PA assessment area.

Similarly, the State College, PA assessment area also received a limited-scope review, though it was given the third heaviest weighting in determining the bank's Pennsylvania CRA rating, due to the significance of operations in this assessment area. First Citizens operated one branch (3%) within the State College, PA assessment area, which generated 4% of the bank's total deposits, and 7% of total loans by number, and 15% of total loans by dollar amount.

The Lancaster, PA assessment area was evaluated using full-scope review procedures. Though full-scope procedures were used to evaluate performance in this assessment area, it was given the fourth highest weight in determining performance in Pennsylvania, given the bank's limited operations in the assessment area. During the evaluation period, the bank operated two branches (7%) within the assessment area, and these branches generated 3% of deposits. From a loan standpoint, 5% of loans by number and 8% of loans by dollar volume were made within the Lancaster, PA assessment area.

In determining the bank's overall CRA rating, behind the assessment areas in the Commonwealth of Pennsylvania, the next greatest amount of weight was assigned to performance within the multistate assessment area, due to its proportion of the bank's overall operations, loan and deposit activity. In reaching conclusions for the multistate assessment area, performance was based solely on performance in the Chester, PA / New Castle, DE assessment area, the bank's only assessment area in the multistate assessment area. First Citizens operated three branches (10%) in the Chester, PA / New Castle, DE assessment area, which generated 11% of total deposits, 4% of loans by number, and just under 7% of loans by dollar volume. This assessment area was evaluated using full-scope review procedures.

In determining the bank's overall CRA rating, the second least amount of weight was given to performance in the State of New York. In reaching the statewide conclusions for the State of New York, performance was based solely on performance in the Allegany, NY assessment area, the bank's only assessment area in the state. First Citizens operated one branch (3%) in the Allegany, NY assessment area, which generated 3% of total deposits, 4% of loans by number, and 2% of total loans by dollar volume. The assessment area was reviewed using full-scope review procedures.

Finally, the least amount of weight in determining the overall CRA rating was assigned to performance in the State of Delaware. In reaching the statewide conclusions for Delaware, performance was based solely on performance in the Dover, DE assessment area, the bank's only assessment area in the state. First Citizens operated one branch (3%) in the Dover DE assessment area, which generated 2% of total deposits, under 1% of loans by number, and just over 1% of loans by dollar volume. The assessment area was reviewed using full-scope review procedures.

As explained previously, the bank's assessment area has changed since the last examination with the addition of both the Chester, PA / New Castle, DE multistate assessment area and the Dover, DE assessment area, both in 2020.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

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

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

Lending Activity

Overall, First Citizens' lending levels reflect good responsiveness to the credit needs of its assessment areas.

As indicated previously, as of September 30, 2021, First Citizens reported total loans of \$1.4 billion, or 71% of bank assets. This percentage exceeds the same measure for the bank's peer group⁴, for which total loans represented 65% of total assets. At the previous evaluation conducted as of July 8, 2019, total loans measured \$1.1 billion and represented 76% of total assets.

The bank's loan-to-deposit ratio averaged nearly 88% over the 12-quarter period ending September 30, 2021, while the peer ratio averaged 83% over the same time frame. First Citizens' loan-to-deposit ratio averaged 82% over the 12 quarters of operation evaluated at the previous exam from January 1, 2016, through September 30, 2018.

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

⁴ First Citizens' Uniform Bank Performance Report peer group includes insured commercial banks having assets between \$1 billion and \$3 billion.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Summary of Lending Activity				
Loan Types	#	%	\$(000s)	%
Home Purchase – Conventional	780	20.2	135,582	24.5
Home Improvement	126	3.3	5,482	1.0
Multifamily Housing	60	1.6	34,563	6.3
Other Purpose Closed-End	155	4.0	7,977	1.4
Refinancing	782	20.2	125,311	22.7
Total HMDA related	1,903	49.3	308,915	55.9
Total Small Business related	1,164	30.1	148,297	26.9
Total Small Farm related	795	20.6	95,113	17.2
TOTAL LOANS	3,862	100.0	552,325	100.0

Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank’s assessment areas. The analysis consisted of an evaluation of First Citizens’ HMDA loans and small business loans. The assessment area concentration analysis indicated that a high percentage of loans were made in the bank’s assessment areas.

More specifically, during the evaluation period, First Citizens made 88% of HMDA loans by number, and 85% by dollar amount, in the bank’s assessment areas. This percentage of lending was a slight increase from the previous evaluation, where 86% of the bank’s HMDA loans by number, and 81% by dollar amount, were made inside the bank’s assessment areas.

With respect to small business loans, almost 87% of the number of small business loans, and 82% by dollar amount, were extended in the bank’s assessment areas. These levels represent a decrease from the previous evaluation when 88% of small business loans by number and dollar amount, were made within the bank’s assessment areas.

Though small farm loans were not included in the CRA analysis, they are included in the table below.

Overall, 85% of loans by number, and 81% of loans by dollar volume were made within the seven assessment areas included in this evaluation. During the previous evaluation period, 82% of loans by number and 79% of loans by dollar volume were made within the bank’s assessment areas.

The table below shows the distribution of lending inside and outside of the bank’s assessment areas.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	115	91.3	\$5,200	94.9	11	8.7	\$282	5.1
Home Purchase - Conventional	664	85.1	\$111,400	82.2	116	14.9	\$24,182	17.8
Multifamily Housing	46	76.7	\$30,366	87.9	14	23.3	\$4,197	12.1
Other Purpose Closed-End	147	94.8	\$6,674	83.7	8	5.2	\$1,303	16.3
Refinancing	708	90.5	\$108,546	86.6	74	9.5	\$16,765	13.4
Total HMDA related	1,680	88.3	\$262,186	84.9	223	11.7	\$46,729	15.1
Total Small Business related	1,007	86.5	\$121,758	82.1	157	13.5	\$26,539	17.9
Total Small Farm related	604	76	\$65,459	68.8	191	24	\$29,654	31.2
TOTAL LOANS	3,291	85.2	\$449,403	81.4	571	14.8	\$102,922	18.6

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

Overall, the bank's distribution of HMDA loans among borrowers of different income levels, including low- and moderate-income borrowers, is good, primarily due to good performance in the Pennsylvania assessment areas, which drove overall CRA performance. More specifically, borrower distribution was good in the Northern Tier, PA assessment area, and adequate in the Lancaster, PA assessment area. Performance in the limited-scope Lebanon, PA and State College, PA assessment areas was consistent with performance in the full-scope Commonwealth of Pennsylvania assessment areas. In the full-scope multistate Chester, PA / New Castle, DE, and the Dover, DE assessment areas, performance was poor. Finally, performance in the Allegany, NY assessment area was adequate.

The geographic distribution of HMDA loans reflects adequate penetration throughout the bank's assessment areas, including in low- and moderate-income census tracts, driven largely by performance in the Pennsylvania assessment areas. Performance in the Northern Tier, PA assessment area was poor, while performance was good in the Lancaster, PA assessment area. Performance in the limited-scope Lebanon, PA and State College, PA assessment areas exceeded performance in the full-scope Pennsylvania assessment areas. In the full-scope multistate Chester, PA / New Castle, DE, and Dover, DE assessment areas, performance was good. Finally, performance in the Allegany, NY assessment area was adequate.

Small Business Lending

Overall, the borrower distribution of small business loans reflects adequate penetration throughout the bank's assessment areas, primarily due to good performance in the Northern, Tier PA assessment area. Performance was adequate in the full-scope Lancaster, PA assessment area. Performance in the limited-scope Lebanon, PA and State College, PA assessment areas was consistent with performance in the full-scope Pennsylvania assessment areas, particularly the Lancaster, PA assessment area. In the full-scope multistate Chester, PA / New Castle, DE, and Allegany, NY assessment areas, performance was adequate. Finally, performance in the full-scope Dover DE assessment area performance was poor.

The geographic distribution of small business loans reflects adequate penetration throughout the bank's assessment areas. Performance was poor in the Northern Tier, PA assessment area, and adequate in the Lancaster, PA assessment area. Performance in the limited-scope Lebanon, PA assessment area exceeded performance in the full-scope Pennsylvania assessment areas, while performance in the limited-scope State College, PA assessment area was consistent with performance in the full-scope Pennsylvania assessment areas. In the full-scope multistate Chester, PA / New Castle, DE, and the Dover, DE assessment areas, performance was good. Finally, performance in the Allegany, NY assessment area was poor.

Responsiveness to Credit Needs

Overall, First Citizens exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and very small businesses. The two primary needs expressed by community contacts were affordable housing, and lending to small businesses, particularly small-dollar loans, and loans to start-ups who may not have the credit experience of larger and more well-established businesses.

The bank's retail HMDA lending record shows that home-mortgage loans are being originated throughout the bank's assessment areas, and include loans made to low- and moderate-income borrowers. Likewise, the bank's retail small business lending record shows that such loans are being made throughout the assessment areas. Further, First Citizens utilizes other forms of innovative and flexible lending products, as well as community development loans to meet affordable housing and small business needs.

More detail on the bank's responsiveness to credit needs can be found within individual assessment area discussions.

Innovative and Flexible Lending Practices

In an effort to address the credit needs of low- and moderate-income borrowers, First Citizens makes use of innovative and flexible lending programs in servicing credit needs in its assessment areas. First Citizens participates in loan programs for first-time homebuyers through the Freddie Mac Home Possible Program, the Federal Housing Administration's (FHA) loan program, the U.S. Department of Veteran's Affairs (VA) loan program, and the U.S. Department of Agriculture's (USDA) Rural Development loan program. The bank also offers a proprietary first-time homebuyer product called "First-Time Homebuyer MSA," for low- and moderate-income borrowers in the bank's MSA areas. Lastly, the bank makes grants under the Federal Home Loan Bank (FHLB) of Pittsburgh's First Front Door program. Under this program, FHLB of Pittsburgh matches a qualified homebuyer's contribution for down payment and closing costs, up to a maximum of \$5,000.

In total during the evaluation period, within the bank's seven assessment areas, First Citizens made 12 Freddie Mac Home Possible loans totaling \$1.3 million; four FHA loans totaling \$553 thousand; two VA loans totaling \$296 thousand; one USDA loan totaling \$133 thousand; four in-house proprietary mortgages totaling \$848 thousand; and one FHLB First Front Door grant in the amount of \$5 thousand.

Similarly, to address the credit needs of small businesses in its assessment areas, First Citizens participates in Small Business Administration (SBA) loan programs, and is a preferred SBA Express Lender.

In total, the bank made 61 SBA loans totaling \$7.3 million within its seven assessment areas.

All special program loans are discussed in more detail by assessment area throughout this Performance Evaluation.

Community Development Lending Activities

First Citizens makes an adequate level of community development loans. During the evaluation period, the bank originated 17 community development loans totaling almost \$8.7 million within its assessment areas. The number of community development loans and the dollar amount of those loans increased significantly since the previous evaluation period, when the bank made five community development loans totaling \$2.9 million.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

By dollar amount of community development loans, the bank's lending was highest in the Northern Tier, PA assessment area (nearly \$5.9 million, or 68%), followed by the Lebanon, PA assessment area (nearly \$1.4 million, or 16%), the Lancaster, PA assessment area (\$965 thousand or 11%), and the Chester, PA / New Castle, DE multistate assessment area (\$454 thousand or 5%). No community development loans were made in the State College, PA, the Dover, DE assessment area, or the Allegany, NY assessment areas.

In addition to community development loans made within its assessment areas, First Citizens made one community development loan totaling \$90 thousand in the greater statewide region. Because the bank adequately met the community development needs within its assessment areas, this community development loan also receives consideration.

By purpose, 53% of community development loan dollars provided economic development through the financing of small businesses or farms, 21% were for affordable housing activities for low- and moderate-income individuals, 16% provided community development services for low- and moderate-income individuals, and 10% were for activities that revitalized or stabilized low- and moderate-income areas.

The bank's lending test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

INVESTMENT TEST

Performance under the investment test is rated low satisfactory.

The investment test was rated needs to improve in the Northern Tier, PA full-scope assessment area, and low satisfactory in the Lancaster, PA full-scope assessment area. Performance in the limited-scope Lebanon, PA assessment area exceeded performance in the full-scope areas in the Commonwealth of Pennsylvania, while performance in the limited-scope State College, PA assessment area was below performance in the full-scope areas in Pennsylvania. In the full-scope Chester, PA / New Castle, DE multistate, and Dover, DE assessment areas, the investment test was rated high satisfactory. Finally, the investment test was rated substantial noncompliance in the Allegany, NY full-scope assessment area.

Overall, First Citizens has an adequate level of qualified investments and donations, which exhibit adequate responsiveness to community development needs. Qualified investments and donations in the bank's assessment areas totaled almost \$6.4 million, and have increased notably from \$972 thousand at the previous examination.

The majority of investment dollars were made in the Chester, PA / New Castle, DE multistate assessment area (nearly \$2.4 million, or 37%), followed by the Dover, DE assessment area (almost \$1.4 million, or 22%), the Lancaster, PA assessment area (\$1.3 million or 20%), and the Lebanon, PA assessment area (\$1.0 million or 16%). Investment dollars in the remaining three assessment areas were negligible, totaling \$294 thousand (5%) in the Northern Tier, PA assessment area, just under \$8 thousand (less than 1%) in the State College, PA assessment area, and only \$9 hundred (less than 1%) in the Allegany, NY assessment area.

The bank made four donations totaling \$6 thousand in the broader statewide region. Because the bank adequately met the community development needs of its assessment areas, these donations also receive consideration.

Of the assessment area investments, 93% supported affordable housing for low- and moderate-income individuals, 6% supported community services targeted to low- and moderate-income individuals, less than 1% supported economic development, and revitalization/stabilization efforts within the assessment areas.

First Citizens exhibits adequate responsiveness to the credit and community development needs of its assessment areas. The vast majority of the bank's qualified investments and donations supported affordable housing, a primary need noted by community contacts. Overall, First Citizens makes occasional use of innovative and/or complex investments to support community development initiatives when opportunities exist.

The bank's investment test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

SERVICE TEST

Performance under the service test is rated high satisfactory.

The service test was rated high satisfactory in the Northern Tier, PA full-scope assessment area, and low satisfactory in the Lancaster, PA full-scope assessment area. Performance in the limited-scope Lebanon, PA and State College, PA assessment areas was consistent with performance in the full-scope areas in Pennsylvania. In the Chester, PA / New Castle, DE full-scope multistate assessment area, the service test was rated high satisfactory, and in the full-scope Allegany, NY, and Dover, DE assessment areas, it was rated low satisfactory.

Branch delivery systems, as well as alternative delivery systems such as automated teller machines (ATMs), telephone banking, and online banking, are accessible to essentially all portions of the bank's assessment areas. As noted previously, First Citizens provides retail services through 26 branches in the Commonwealth of Pennsylvania (87%), three branches in the State of Delaware (10%), and one in the State of New York (3%).

By assessment area, branch locations are as follows: 16 branches (53%) are located in the bank's Northern Tier, PA assessment area; six branches (20%) are located in the Lebanon, PA assessment area; one branch (3%) is located in the State College, PA assessment area; two branches (7%) are located in the Lancaster, PA assessment area; three branches are located in the Chester, PA / New Castle, DE assessment area (10%); one branch (3%) is located in the Dover, DE assessment area; and one branch (3%) is located in the Allegany, NY assessment area.

First Citizens' record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals or areas. Since the previous evaluation, the bank has added the Chester, PA / New Castle, DE multistate assessment area, and the Dover, DE assessment area, both in 2020 through the acquisition of MidCoast Community Bank.

In total, during the evaluation period, one branch was closed in the Lebanon, PA assessment area, and the bank opened three branches in the Chester, PA / New Castle, DE multistate assessment area, and one branch in the Dover, DE assessment area.

Overall, banking services do not vary in a way that inconveniences the institution's constituents, particularly low- and moderate-income consumers in the bank's assessment areas. Generally, hours of operation are reasonable, with the majority of the bank's branches offering extended business hours once a week. Though there is some variation in the presence of ATMs, drive-up facilities and Saturday morning hours, the majority of branches offer these services. Differences are discussed in more detail by assessment area.

Finally, the bank provides a relatively high level of community development services in its assessment areas. More specifically, the bank provides a relatively high level of community development services in the full-scope Northern Tier, PA and Chester, PA / New Castle, DE multi-state assessment areas, and an adequate level in the bank's Lancaster, PA, Allegany, NY, and Dover, DE assessment areas. Performance in the limited-scope Lebanon, PA and State College, PA assessment areas was consistent with performance in the full-scope Pennsylvania assessment areas.

The bank's service test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

First Citizens 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.

COMMONWEALTH OF PENNSYLVANIA

STATE RATING

Performance Test	Performance Level
Lending	Low Satisfactory
Investment	Needs to Improve
Service	High Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects good penetration among retail customers, and adequate distribution among businesses of different sizes;
- The geographic distribution of loans reflects good penetration throughout the Commonwealth of Pennsylvania assessment areas;
- The bank makes use of innovative and/or flexible lending practices;
- The bank made an adequate level of community development loans in Commonwealth of Pennsylvania;
- The bank has a poor level of qualified community development investments and grants in the state;
- The bank exhibits adequate responsiveness to credit and community development needs; and
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

First Citizens' CRA performance in the Commonwealth of Pennsylvania was evaluated for the period from July 9, 2019 through March 28, 2022. The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development loans.

As mentioned previously, examiners completed a full-scope review in the Northern Tier, PA assessment area as the majority of the bank's operations are in this assessment area, including branches, as well as deposit and lending production.

Examiners also conducted a full-scope review of the Lancaster, PA assessment area. Though the Lebanon, PA and State College, PA assessment areas both had a greater proportion of operations, and were therefore weighted more heavily in determining the statewide rating, a full-scope review was performed in the Lancaster, PA assessment area. During the last performance evaluation, this assessment area was subject to a limited-scope review. Further, examiners noted that the Lancaster, PA assessment area has a larger proportion of low- and moderate-income census tracts than other Pennsylvania assessment areas, as well as a larger population.

Examiners conducted a limited-scope review in the Lebanon, PA assessment area. From an operations standpoint, the second greatest amount of loans, branches and deposits were from this assessment area. However, because it was reviewed as a full-scope assessment area at the last performance evaluation, a limited-scope review was conducted at this evaluation.

Finally, examiners conducted a limited-scope review in the State College, PA assessment area. This assessment area was not reviewed at the last performance evaluation, as it had just been added by the bank in 2018.

As mentioned previously, for purposes of assessing First Citizens' overall CRA performance, more weight was given to the performance in the Commonwealth of Pennsylvania than in the bank's multistate MSA assessment area, the State of Delaware, or the State of New York.

DESCRIPTION OF INSTITUTION'S OPERATIONS

In the Commonwealth of Pennsylvania, the majority of the bank's business was conducted in the Northern Tier, PA assessment area, and thus it was given the most weight in determining the overall CRA rating in Pennsylvania and was evaluated using full-scope review procedures. In total, 16 of the bank's 30 branches (53%) were located in the Northern Tier, PA assessment area. Similarly, 57% of the bank's deposits were held in the assessment area, while from a loan perspective, 63% of the loans by number, and nearly 50% of loans by dollar volume were made within the Northern Tier, PA assessment area.

The Lebanon, PA assessment area was given the second highest weight in determining the overall state rating in Pennsylvania. This assessment area was evaluated using limited-scope review procedures, as discussed previously. During the evaluation period, First Citizens operated six branches in the assessment area (20%), and these branches generated 21% of the bank's total deposits. From a loan standpoint, nearly 17% of the bank's loans by number, and 17% by dollar volume were made in the Lebanon, PA assessment area.

The State College, PA assessment area was assigned the third greatest weight in determining the state rating, and was evaluated using limited-scope review procedures, as indicated previously. First Citizens operated one branch in the State College, PA assessment area (3%), which generated 4% of the bank's total deposits. Approximately 7% of loans by number, and 15% by dollar volume, were made in the State College, PA assessment area.

Finally, the Lancaster, PA assessment area was given the least amount of weight in determining the overall state rating in Pennsylvania. As indicated previously, it was evaluated using full-scope review procedures. During the evaluation period, First Citizens operated two branches in the assessment area (7%), which generated 3% of the bank's total deposits. From a lending perspective, just over 5% of the bank's loans by number, and 8% by dollar volume, were made in the Lancaster, PA assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overall, the lending test was determined to be low satisfactory in the Commonwealth of Pennsylvania. The lending test was rated low satisfactory in the Northern Tier, PA and Lancaster, PA assessment areas. Using limited-scope review procedures, the Lebanon, PA assessment area lending test performance exceeded that in the full-scope review Pennsylvania assessment areas. Finally, in the State College, PA assessment area, lending test performance was consistent with the performance in the full-scope assessment areas. Primary drivers of the overall lending test rating were borrower and geographic distribution of loans, the bank's use of innovative and/or flexible lending products, and community development lending. It is noted that borrower distribution was weighted more heavily than geographic distribution, given the demographics of the Pennsylvania assessment areas. More detail on lending test components is provided in the discussions of each Pennsylvania assessment area.

INVESTMENT TEST

Overall, the investment test was determined to be needs to improve in the Commonwealth of Pennsylvania. The investment test was rated needs to improve in the Northern Tier, PA assessment area, and low satisfactory in the Lancaster, PA assessment area. In the Lebanon, PA assessment area, performance exceeded that in the full-scope review Pennsylvania assessment areas, and in the State College, PA assessment area, performance was below the performance in the full-scope assessment areas. The investment test rating was driven by the amount of qualified investments and donations, with additional consideration given to the responsiveness, innovativeness, and complexity of such investments. More detail on the investment test components is provided in the discussions of each Pennsylvania assessment areas.

SERVICE TEST

Overall, the service test was determined to be high satisfactory in the Commonwealth of Pennsylvania. The service test was rated high satisfactory in the Northern Tier, PA assessment area, and low satisfactory in the Lancaster, PA assessment areas. In both the Lebanon, PA and State College, PA assessment areas, performance was consistent with that in the full-scope review Pennsylvania assessment areas. The service test was influenced by retail service aspects, particularly the accessibility of delivery systems and reasonableness of hours and services in serving assessment area needs, as well as the level of community development services provided by the bank in the Commonwealth. More detail on the service test components is provided in the discussions of each Pennsylvania assessment area.

NORTHERN TIER, PA ASSESSMENT AREA (NON-MSA) FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

The Northern Tier, PA assessment area consists of the entirety of Bradford, Clinton, Potter, and Tioga Counties in Pennsylvania. The Northern Tier, PA counties are all located in the non-MSA portion of the Commonwealth of Pennsylvania.

For the purposes of assessing First Citizens' CRA performance in the Commonwealth of Pennsylvania, and overall, the greatest weight was given to the performance in the Northern Tier, PA assessment area. Of the bank's total loans, 63% by number, and 50% by dollar volume can be attributed to this assessment area.

As mentioned previously, First Citizens operates 16 branches (53% of its total branches) in this assessment area, which hold \$974 million in deposits, or 57% of the bank's total deposits as of June 30, 2021.

First Citizens Community Bank's CRA performance was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Northern Tier, PA assessment area comprised 38 census tracts. Of these 38 tracts, one (3%) was designated as low-income, one (3%) was moderate-income, 34 (89%) were middle-income, and two (5%) were upper-income. The assessment area's low-income tract was located in Lock Haven, and the moderate-income tract was located in the northwestern portion of Clinton County, near Leidy and East Keating townships.

A map of the Northern Tier, PA assessment area at the 2015 ACS is available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, there were 13 depository institutions operating in the Northern Tier, PA assessment area. These institutions maintained a total of 58 branches holding \$3.4 billion in deposits. First Citizens, with 16 branches in the assessment area, ranked first, with nearly \$974 million, or 29% of the deposit market. Citizens and Northern Bank held the second largest share of deposits with 28% of the market, followed by Northwest Bank, with 11% of the market.

First Citizens reports home-mortgage loans pursuant to HMDA and was compared to all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to the 2018 data, there were 191 HMDA reporters in the assessment area, who originated or purchased 3,371 loans in the Northern Tier, PA assessment area. First Citizens ranked second in the HMDA market, with 10% of the HMDA market. Citizens and Northern Bank led the market with 14% market share, and Jersey Shore State Bank ranked third, with nearly 9% of the HMDA market.

According to 2019 data, there were 195 HMDA reporters in the assessment area, who originated or purchased 3,690 loans. Once again, First Citizens ranked second, holding just under 9% of the HMDA market. Citizens and Northern Bank was the market leader, with 15% of the market, and Jersey Shore State Bank ranked third, with just under 8% of the HMDA market.

Finally, according to 2020 data, there were 219 HMDA reporters, who originated or purchased 4,667 HMDA loans in the assessment area. As in prior years, First Citizens ranked second, with just under 10% market share. Citizens and Northern Bank led the market, with 17% market share, and Quicken Loans, LLC ranked third, with 6% of the HMDA market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2018 data, there were 74 CRA small business reporters in the Northern Tier, PA assessment area, who originated or purchased 2,345 small business and small farm loans in the assessment area. First Citizens tied for second in the market, with 9% of CRA loans. American Express, NB led the market, with over 12% market share, and Chase Bank USA, N.A. ranked third, with just under 8% of the market.

According to 2019 data, there were 68 CRA reporters in the assessment area, who originated or purchased 2,541 CRA loans. First Citizens ranked fourth, holding 8% market share. American Express, NB led the market, with over 11% of the market, followed by JP Morgan Chase Bank, N.A. (9%), and Synchrony Bank (9%).

Finally, according to 2020 data, there were 84 CRA reporters, who originated or purchased 2,817 loans in the assessment area. First Citizens ranked second, with 15% market share. Citizens and Northern Bank led the market, with nearly 22% market share, and American Express, NB ranked third, with almost 8% market share.

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national credit card originators and regional banks. This was particularly the case in 2018, when American Express, NB, Synchrony Bank, Chase Bank USA, N.A., and Capital One Bank USA, N.A. were among the top five small business and small farm reporters, collectively holding 36% of the CRA market share in this assessment area.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit and community development needs of the Northern Tier, PA assessment area. One interview was held with an agency focused on economic development, and the other was with a community action agency.

The community contacts identified affordable housing as a significant need in the assessment area, noting that quality housing stock is particularly challenging, as homes often need rehabilitation. Further, contacts indicated that the type of housing wanted by buyers is not often the type available on the market. Contacts indicated that the availability of small business credit is often scarce for start-ups who don't have significant credit history. Additionally, childcare is a pressing need, so credit for small businesses in the childcare industry is a specialized need. Other community needs included workforce development, broadband and internet in rural areas, and mental health and substance abuse programming.

Economic Characteristics

As indicated above, the Northern Tier, PA assessment area consists of the entirety of Bradford, Clinton, Potter, and Tioga Counties in Pennsylvania. These non-MSA counties are in northern Pennsylvania, and border the state of New York to the north, and are also in between the economic centers of Williamsport to the southwest, and Wilkes-Barre/Scranton, to the east.

Compared to the bank's other Pennsylvania assessment areas, the Northern Tier assessment area is the least densely populated. Historically, the region's economy has been influenced by its abundant natural resources, including agriculture and forest lands. In the 2000s and early 2020s, the Northern Tier's economy was boosted by the discovery of the Marcellus Shale deposits, though production has since declined significantly. Economic highlights for each of the counties in the assessment area follow.

Bradford County, the easternmost county in the Northern Tier, PA assessment area is the second largest county in the Commonwealth by area. Bradford County is known for its agricultural and outdoor recreational opportunities, including hunting, fishing and hiking. As of the 2015 ACS, the population of Bradford County measured 62,228.

Per the Pennsylvania Department of Labor and Industry, leading employers in Bradford County include the Robert Packer Hospital Inc., Cargill Meat Solutions Corporation, and Guthrie Medical Group, PC. The top industries in the county are general medical and surgical hospitals, elementary and secondary schools, and animal slaughtering and processing.

Clinton County, with a population of 39,614 at the 2015 ACS update, is known as the gateway to the Pennsylvania wild lands. Over 60% of the county consists of state lands, and includes lakes, forests and state parks and game lands. Lock Haven is a notable city in the county, and is home to Lock Haven University.

Per the Pennsylvania Department of Labor and Industry, leading employers in Clinton County include First Quality Products, Inc., First Quality Tissue, LLC, and Keystone Central School District. The top industries in the county are converted paper product manufacturing, restaurants and other eating places, and elementary and secondary schools.

Potter County, the westernmost county within the assessment area, is also the least populous, with only 17,377 residents per the 2015 ACS. Potter County contains nearly 400 square miles of state parks and forests. As a result, this mountainous region is one of the most sparsely populated counties in the Commonwealth.

Per the Pennsylvania Department of Labor and Industry, leading employers in Potter County include the Charles Cole Memorial Hospital, Zito Media, and Morris Compressors, Inc. The top industries in the county are general medical and surgical hospitals, elementary and secondary schools, and wired and wireless telecommunications carriers.

Finally, Tioga County, which is situated between Potter and Bradford Counties, is home to the Pine Creek Gorge, better known as the Pennsylvania Grand Canyon, one of the state’s noteworthy natural attractions. As such, outdoor activities are important draws of the county, as they are in the other three Northern Tier, PA counties. Tioga County is home to Mansfield, and Mansfield University, and is where First Citizens’ main office is located. As of the 2015 ACS, the population of Tioga County measured 42,284.

Per the Pennsylvania Department of Labor Center for Workforce Information and Analysis, leading employers in Tioga County include the Soldier & Sailors Memorial Hospital, Ward Manufacturing LLC, and Northern Tioga School District. The top industries in the county are elementary and secondary schools, restaurants and other eating places, and plastics product manufacturing.

During the evaluation period, seasonally unadjusted unemployment rates throughout the Northern Tier, PA assessment area increased as economic conditions declined. Within the assessment area, Potter County had the highest unemployment rates of all four counties in the assessment area, throughout the evaluation period, while Bradford County had the lowest unemployment rates in all three years. Area unemployment rates for years 2018, 2019, and 2020, as reported by the Bureau of Labor Statistics are reflected in the following table.

First Citizens Community Bank Northern Tier, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	% 2018 Annual	% 2019 Annual	% 2020 Annual
Bradford County, PA	4.5	4.5	7.5
Clinton County, PA	5.5	5.5	8.7
Potter County	5.5	6.0	9.3
Tioga County	5.3	5.4	9.0
Commonwealth of Pennsylvania	4.5	4.5	9.1
United States	3.9	3.7	8.1

Unemployment data is from the Bureau of Labor Statistics.

Housing

According to 2015 ACS data, the assessment area contained 83,426 housing units, 55% of which were owner-occupied, almost 20% of which were rentals, and 25% of which were vacant. The overall owner-occupancy rate in the assessment area (55%) was below that in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to the 2015 ACS data, of the 46,203 owner-occupied housing units in the Northern Tier, PA assessment area, less than 1% were located in low-income census tracts, and only 2% were in moderate-income tracts. The vast majority of owner-occupied housing units were located in middle-income census tracts (91%), and 7% were located in upper-income tracts.

Of the total existing housing units, 74% of the housing units were single family units, just under 7% were two-to four family units, 5% were multifamily (five or more family) units, and 14% were mobile homes. The median age of housing was 54 years, matching the age of the housing stock statewide (54 years).

Data show that the price of housing in the assessment area was more affordable than in the Commonwealth overall. According to 2015 ACS data, the median housing value in the Northern Tier, PA assessment area was \$121,132, which was significantly lower than that reported in the Commonwealth of Pennsylvania overall (\$166,000). Data shows a disparity in housing values in low- and moderate-income census tracts compared to those located in middle- and upper-income tracts. The median housing value in the assessment area’s low-income tracts was \$88,695, and dropped to \$58,505 in the moderate-income tract. These values were significantly lower than the median housing values in middle- and upper-income tracts (\$123,881 and \$148,502, respectively).

Finally, median gross rent (rent plus utilities) was notably less expensive in the assessment area than in Pennsylvania. Median gross rent in the Northern Tier, PA assessment area was \$670, well below the median gross rent in the Commonwealth, at \$840. Within the assessment area, 39% of renters spent more than 30% of their income on rent, which is a lower figure than that in Pennsylvania as a whole (46%).

Borrower Income Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 42,115 families in the assessment area. Of the total families in the assessment area, 19% were designated as low-income, 19% were moderate-income, 21% were middle-income, and 41% were upper-income.

In the Northern Tier, PA assessment area, 10% of families were living below the poverty level, compared with a rate of 9% for the Commonwealth of Pennsylvania.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC.

Median family incomes for the assessment area are listed in the following table for each of the years covered by the evaluation, and are categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Year	FFIEC Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50%-less than 80%)	Middle-Income (80%-less than 120%)	Upper-Income (120% or Greater)
2018	\$60,500	\$30,250	\$30,250 - \$48,399	\$48,400 - \$72,599	\$72,600 or more
2019	\$63,200	\$31,600	\$31,600 - \$50,559	\$50,560 - \$75,839	\$75,840 or more
2020	\$64,900	\$32,450	\$32,450 - \$51,919	\$51,920 - \$78,879	\$78,880 or more

Geographic Business Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually.

According to Dun & Bradstreet data, in 2018, there were 5,967 businesses in the Northern Tier, PA assessment area. Of these businesses, 2% of businesses were located in low-income tracts, and 2% were located in moderate-income tracts. The vast majority of businesses (90%) were located in middle-income tracts, and 6% of businesses were located in upper-income tracts. Business demographic data also revealed that of the 5,967 businesses located in the assessment area, 89% were small businesses with gross annual revenues of \$1 million or less.

In 2019, there were 5,918 businesses in the assessment area. Of these, almost 3% were located in low-income tracts, nearly 2% were located in moderate-income tracts, 90% were located in middle-income tracts, and 6% were located in upper-income tracts. Of the 5,918 businesses in the assessment area, 89% were small businesses with gross annual revenues of \$1 million or less.

Finally, according to 2020 Dun & Bradstreet data, there were 5,971 businesses in the Northern Tier, PA assessment area. Of these, 3% of businesses were located in low-income tracts, 1% were located in moderate-income tracts, 90% were located in middle-income tracts, and 6% of businesses were located in upper-income tracts. Of the 5,971 businesses located in the assessment area in 2020, 89% were small businesses with gross annual revenues of \$1 million or less.

Assessment area demographics used in evaluating First Citizens' performance in the Northern Tier, PA assessment area in 2018, 2019 and 2020 are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Northern Tier, PA Assessment Area (Non MSA) Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.6	478	1.1	216	45.2	7,908	18.8
Moderate-income	1	2.6	833	2.0	144	17.3	7,971	18.9
Middle-income	34	89.5	38,173	90.6	3,645	9.5	8,981	21.3
Upper-income	2	5.3	2,631	6.1	197	7.5	17,255	41.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	38	100.0	42,115	100.0	4,202	10.0	42,115	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,113	225	0.5	20.2	825	74.1	63	5.7
Moderate-income	3,182	992	2.1	31.2	300	9.4	1,890	59.4
Middle-income	74,935	41,861	90.6	55.9	14,534	19.4	18,540	24.7
Upper-income	4,196	3,125	6.8	74.5	572	13.6	499	11.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	83,426	46,203	100.0	55.4	16,231	19.5	20,992	25.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	144	2.4	123	2.3	18	4.2	3	1.4
Moderate-income	95	1.6	78	1.5	4	0.9	13	6.2
Middle-income	5,388	90.3	4,829	90.7	375	87.0	184	87.6
Upper-income	340	5.7	296	5.6	34	7.9	10	4.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,967	100.0	5,326	100.0	431	100.0	210	100.0
Percentage of Total Businesses:			89.3		7.2		3.5	
	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	1	0.2	1	0.2	0	0.0	0	0.0
Middle-income	476	95.2	467	95.1	8	100.0	1	100.0
Upper-income	23	4.6	23	4.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	500	100.0	491	100.0	8	100.0	1	100.0
Percentage of Total Farms:			98.2		1.6		0.2	

2015 ACS Data and 2018 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Northern Tier, PA Assessment Area (Non MSA) Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.6	478	1.1	216	45.2	7,908	18.8
Moderate-income	1	2.6	833	2.0	144	17.3	7,971	18.9
Middle-income	34	89.5	38,173	90.6	3,645	9.5	8,981	21.3
Upper-income	2	5.3	2,631	6.3	197	7.5	17,255	41.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	38	100.0	42,115	100.0	4,202	10.0	42,115	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,113	225	0.5	20.2	825	74.1	63	5.7
Moderate-income	3,182	992	2.1	31.2	300	9.4	1,890	59.4
Middle-income	74,935	41,861	90.6	55.9	14,534	19.4	18,540	24.7
Upper-income	4,196	3,125	6.8	74.5	572	13.6	499	11.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	83,426	46,203	100.0	55.4	16,231	19.5	20,992	25.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	153	2.6	134	2.5	16	3.7	3	1.4
Moderate-income	95	1.6	78	1.5	4	0.9	13	6.1
Middle-income	5,333	90.1	4,769	90.4	376	87.5	188	88.3
Upper-income	337	5.7	294	5.6	34	7.9	9	4.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,918	100.0	5,275	100.0	430	100.0	213	100.0
Percentage of Total Businesses:			89.1		7.3		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	1	0.2	1	0.2	0	0.0	0	0.0
Middle-income	461	95.4	452	95.4	8	100.0	1	100.0
Upper-income	21	4.4	21	4.4	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	483	100.0	474	100.0	8	100.0	1	100.0
Percentage of Total Farms:			98.1		1.7		0.2	

2015 ACS Data and 2019 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Northern Tier, PA Assessment Area (Non MSA) Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.6	478	1.1	216	45.2	7,908	18.8
Moderate-income	1	2.6	833	2.0	144	17.3	7,971	18.9
Middle-income	34	89.5	38,173	90.6	3,645	9.5	8,981	21.3
Upper-income	2	5.3	2,631	6.3	197	7.5	17,255	41.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	38	100.0	42,115	100.0	4,202	10.0	42,115	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,113	225	0.5	20.2	825	74.1	63	5.7
Moderate-income	3,182	992	2.1	31.2	300	9.4	1,890	59.4
Middle-income	74,935	41,861	90.6	55.9	14,534	19.4	18,540	24.7
Upper-income	4,196	3,125	6.8	74.5	572	13.6	499	11.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	83,426	46,203	100.0	55.4	16,231	19.5	20,992	25.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	156	2.6	139	2.6	14	3.3	3	1.4
Moderate-income	83	1.4	69	1.3	4	0.9	10	4.7
Middle-income	5,382	90.1	4,816	90.4	376	87.6	190	89.6
Upper-income	350	5.9	306	5.7	35	8.2	9	4.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,971	100.0	5,330	100.0	429	100.0	212	100.0
Percentage of Total Businesses:			89.3		7.2		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	1	0.2	1	0.2	0	0.0	0	0.0
Middle-income	464	95.1	455	95.0	8	100.0	1	100.0
Upper-income	23	4.7	23	4.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	488	100.0	479	100.0	8	100.0	1	100.0
Percentage of Total Farms:			98.2		1.6		0.2	

2015 ACS Data and 2020 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

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

Performance under the lending test is rated low satisfactory in Northern Tier, PA assessment area.

Lending Activity

First Citizens' lending levels in the Northern Tier, PA assessment area reflect good responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Northern Tier, PA assessment area represented 63% of the bank's overall lending by number of loans, and 50% by dollar volume. During the evaluation period, First Citizens made 1,119 HMDA loans totaling nearly \$130 million, and 581 small business loans totaling \$63 million in the Northern Tier, PA assessment area.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given considerably more weight than geographic distribution in this assessment area in driving lending performance due to the demographics of the assessment area. More specifically, the Northern Tier, PA assessment area has only one low-income tract, and only one moderate-income tract. Further, due to loan volumes, HMDA loans are given more weight in determining the bank's overall borrower distribution of loans, followed by small business loans.

Home-Mortgage Lending

First Citizens' distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is good.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income individuals and families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 19% of assessment area families were low-income, 19% were moderate-income, 21% were middle-income, and 41% were upper-income. According to 2015 ACS data, 38% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following table compares First Citizens’ home-mortgage lending to aggregate home-mortgage lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table relies on 2015 ACS data along with updated HMDA data, following the requirements of Regulation C.

First Citizens Community Bank Northern Tier, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level							
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison					
		2018		2019		2020	
		% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending
Low	18.8	8.5	7.9	7.7	7.2	4.4	5.1
Moderate	18.9	17.3	19.0	19.0	19.3	13.5	17.1
Middle	21.3	29.3	25.6	22.4	23.5	25.1	23.4
Upper	41.0	40.5	37.6	45.4	38.8	52.4	39.0
Unknown	0.0	4.4	9.9	5.5	11.2	4.6	15.4
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, First Citizens’ lending to low-income borrowers was good.

In assessing the level of the bank’s lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

First Citizens’ lending in 2018 to low-income borrowers was good. In total, almost 9% of the bank’s 341 HMDA loans (29 loans) were originated to low-income borrowers, exceeding the aggregate lending level of 8%, but trailing the proxy of 19%. By loan category, First Citizens originated 3% of its home purchase loans (5 loans), 16% of its refinance loans (16 loans), 15% of its home improvement loans (six loans), and no multifamily loans or loans with purpose “not applicable” to low-income borrowers. In comparison, aggregate lenders made 6% of home purchase loans, 11% of refinance loans, 9% of home improvement loans, 2% of loans with purpose “not applicable,” and no multifamily loans to low-income borrowers in 2018.

First Citizens' lending in 2019 to low-income borrowers was good. Of First Citizens' 326 HMDA loans in 2019, 8% of the bank's HMDA loans (25 loans) were originated to low-income borrowers, exceeding the aggregate lending level of 7%, but trailing the proxy of 19%. By loan type, First Citizens originated 4% of its home purchase loans (six loans), 11% of its refinance loans (11 loans), 8% of its home improvement loans (two loans), and no multifamily or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 6% of home purchase loans, 8% of refinance loans, 10% of home improvement loans, and no multifamily loans or loans with purpose "not applicable" to low-income borrowers in 2019.

First Citizens' lending in 2020 to low-income borrowers was adequate. Of First Citizens' 452 HMDA loans, 4% (20 loans) were originated to low-income borrowers, trailing the aggregate lending level of 5%, and the proxy of 19%. By loan category, First Citizens originated 6% of its home purchase loans (seven loans), 3% of its refinance loans (eight loans), 4% of its home improvement loans (one loan), and no multifamily or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 6% of home purchase loans, 4% of refinance loans, 7% of home improvement loans, and no multifamily or loans with purpose "not applicable" to low-income borrowers in 2020.

Lending to Moderate-Income Borrowers

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

First Citizens' lending in 2018 to moderate-income borrowers was good. Of First Citizens' 341 HMDA loans, 17% (59 loans) were originated to moderate-income borrowers. This performance was just below the aggregate lending level and the percentage of families by family income level (both 19.0%). By loan category, First Citizens originated 16% of its home purchase loans (26 loans), 17% of its refinance loans (17 loans), 15% of its home improvement loans (six loans), and no multifamily or loans purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 20% of home purchase loans, 20% of refinance loans, 14% of home improvement loans, 11% of multifamily loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2018.

First Citizens' lending in 2019 to moderate-income borrowers was good. Of the bank's 326 HMDA loans, 19% (62 loans) were originated to moderate-income borrowers. The bank's lending matched both aggregate lending level and proxy, both of which were also 19%. By loan category, First Citizens originated 16% of its home purchase loans (23 loans), 20% of its refinance loans (21 loans), 23% of its home improvement loans (six loans), and no multifamily or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 20% of home purchase loans, 18% of refinance loans, 20% of home improvement loans, 4% multifamily loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2019.

First Citizens' lending in 2020 to moderate-income borrowers was adequate. In 2020, 14% of the bank's 452 total HMDA loans (61 loans) were originated to moderate-income borrowers. This performance fell below the aggregate lending level of 17%, and the proxy of 19%. By loan category, First Citizens originated 15% of its home purchase loans (19 loans), 11% of its refinance loans (28 loans), 15% of its home improvement loans (four loans), 17% of its multifamily loans (one loan), and no loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 22% of home purchase loans, 14% of refinance loans, 17% of home improvement loans, 3% of multifamily loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2020.

Small Business Lending

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

The number of businesses operating in the Northern Tier, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to available Dun & Bradstreet business demographic data, in 2018 there were 5,967 businesses in the assessment area, with 89% designated as small businesses. In 2019, there were 5,918 businesses in the assessment area, 89% of which were small businesses. Finally, in 2020, there were 5,971 businesses in the assessment area, 89% of which were small businesses.

In 2018, the bank's borrower distribution of small business loans was good. In 2018, First Citizens originated 94 small business loans in the assessment area, aggregating \$14 million. Of these loans, 57% were originated to small businesses (54 loans). This performance was above the aggregate lending level of 40% to small businesses, but below the proxy of 89%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2018, 66% of First Citizens' small business loans were extended in amounts of \$100 thousand or less (62 loans). Aggregate data indicates that 90% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2019, the bank's borrower distribution of small business loans was good. In 2019, First Citizens originated 126 small business loans within the assessment area, aggregating \$15 million. Of these loans, 68% were originated to small businesses (86 loans). This performance was above the aggregate lending level of 42% to small businesses, but below the proxy of 89%.

Further, in 2019, 66% of First Citizens' small business loans were extended in amounts of \$100 thousand or less (83 loans). Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Finally, in 2020, the bank's borrower distribution of small business loans was adequate. In 2020, First Citizens originated 361 small business loans within the assessment area, aggregating \$34 million. Of these loans, 16% were originated to small businesses (56 loans).⁵ This performance was below the aggregate lending level of 35% to small businesses, and below the proxy of 89%.

In 2020, 77% of First Citizens' small business loans were extended in amounts of \$100 thousand or less (277 loans). Aggregate data indicates that 86% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects poor penetration throughout the Northern Tier, PA assessment area, including in low- and moderate-income census tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount, followed by small business loans. Further, due to the demographics of the assessment area, more weight was given to the bank's lending in moderate-income census tracts.

Home-Mortgage Lending

First Citizens' distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is poor. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, less than 1% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 2% was located in moderate-income tracts. The vast majority of owner-occupied housing was located in middle- (91%) and upper-income tracts (7%, respectively).

The following table presents First Citizens' geographic distribution of HMDA loans from 2018 to 2020, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The tables used for lending in all three years rely on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

⁵Notably, in 2020, 71.5% of small business loans in the assessment area were originated to businesses of unknown income (258 loans). This is attributable to the bank's participation in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provides small businesses with funds to pay up to eight weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. Under this program, institutions were not required to collect revenue information. For context, on the entire First Citizens' 2020 CRA LAR, 59% of the reported loans were PPP loans which were reported without revenue (584 loans).

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Northern Tier, PA Assessment Area Geographic Distribution of HMDA Loans							
Census Tract Income Level	% Owner- Occupied Units (2015 ACS Data)	Aggregate Comparison					
		2018		2019		2020	
		% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending
Low	0.5	0.0	0.7	0.3	0.4	0.0	0.3
Moderate	2.1	0.0	1.5	0.0	1.7	0.0	1.4
Middle	90.6	95.6	92.7	96.3	92.0	94.9	92.2
Upper	6.8	4.4	5.1	3.4	5.9	5.1	6.1
Unknown	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, First Citizens’ overall HMDA lending in low-income tracts was poor, though very little weight was given to First Citizens’ overall HMDA lending in low-income tracts, given the demographics of the assessment area. More specifically, the Northern Tier, PA assessment area has only one low-income census tract, where less than 1% of owner-occupied housing is located.

First Citizens’ lending in low-income census tracts in 2018 was poor. First Citizens originated no HMDA loans in low-income tracts in 2018, which was below the aggregate lending level and proxy of owner-occupied units, both of which measured just under 1%. By product type, aggregate lenders made 1% of home purchase loans, less than 1% of refinance loans, 1% of home improvement loans, and no multifamily or loans with purpose “not applicable” in low-income tracts in the assessment area.

First Citizens’ lending in low-income census tracts in 2019 was poor. First Citizens originated less than 1% of HMDA loans (one loan) in low-income tracts in 2019, which approximated the aggregate lending level, but below the proxy of just under 1%. By loan product type, First Citizens’ sole loan in a low-income tract was a home purchase loan. Aggregate lenders made less than 1% of home purchase, refinance, and home improvement loans, and no multifamily, or loans with purpose “not applicable” in low-income tracts in the assessment area in 2019.

First Citizens’ lending in low-income census tracts in 2020 was poor. First Citizens originated no HMDA loans in low-income tracts in 2020, which was below both the aggregate lending performance and proxy (both under 1%). By product, aggregate lenders made less than 1% of home purchase loans, refinance loans, and home improvement loans, 3% of multifamily loans, and 1% of loans with purpose “not applicable” in low-income tracts in 2020.

Lending in Moderate-Income Census Tracts

For the period under review, the bank’s HMDA lending in moderate-income tracts was poor. However, little weight was given to this performance, due to the demographics of the assessment area. As in low-income census tracts, few lending opportunities were available in moderate-income tracts. This assessment area included only one moderate-income tract, where only 2% of owner-occupied housing units were located.

First Citizens' lending in moderate-income census tracts in 2018 was poor. In 2018, First Citizens made no HMDA loans in moderate-income census. This performance measured below the aggregate lending performance of just under 2%, as well as the proxy of 2%. Aggregate lenders made 1% of home purchase loans, 1% of refinance loans, 3% of home improvement loans, no multifamily loans, and 2% of loans with purpose "not applicable" in moderate-income tracts in 2018.

First Citizens' lending in moderate-income census tracts in 2019 was poor. In 2019, First Citizens made no HMDA loans in moderate-income tracts. Again, the bank's performance was below both the aggregate lending performance and the proxy of owner-occupied housing (both 2%). Aggregate lenders made 1% of home purchase loans, 2% of refinance loans, 3% of home improvement loans, and no multifamily or loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2019.

First Citizens' lending in moderate-income census tracts in 2020 was poor. In 2020, First Citizens' originated no HMDA loans in moderate-income tracts. This performance measured below aggregate performance of 1%, and the proxy of 2%. Aggregate lenders made 1% of home purchase loans, 1% of refinance loans, 4% of home improvement loans, and no multifamily, or loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2020.

Small Business Lending

The geographic distribution of First Citizens' small business loans reflects poor penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. According to Dun & Bradstreet data in 2018, there were 5,967 businesses in the assessment area. Of these businesses, 2% were located in low-income tracts, and almost 2% were located in moderate-income tracts. The majority of businesses were located in middle-income tracts (90%), and 6% were located in upper-income tracts. In 2019, there were 5,918 businesses in the assessment area. Of these businesses, almost 3% were located in low-income tracts, and 2% were located in moderate-income tracts. Again, the majority of businesses were located in middle-income tracts (90%), and 6% were located in upper-income tracts. In 2020, the assessment area had 5,971 businesses, with nearly 3% of businesses located in low-income tracts, and 1% located in moderate-income tracts. As in past years, the majority of businesses were located in middle-income tracts (90%), and 6% were located in upper-income tracts.

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

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank Northern Tier, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2018	
		% First Citizens Lending	% Aggregate Lending
Low	2.4	0.0	2.7
Moderate	1.6	0.0	1.0
Middle	90.3	93.6	87.8
Upper	5.7	6.4	7.0
Unknown	0.0	0.0	1.5
Total	100.0	100.0	100.0

First Citizens Community Bank Northern Tier, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2019	
		% First Citizens Lending	% Aggregate Lending
Low	2.6	0.0	1.8
Moderate	1.6	0.0	1.3
Middle	90.1	95.2	88.0
Upper	5.7	4.8	7.3
Unknown	0.0	0.0	1.6
Total	100.0	100.0	100.0

First Citizens Community Bank Northern Tier, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2020	
		% First Citizens Lending	% Aggregate Lending
Low	2.6	0.3	2.6
Moderate	1.4	0.0	1.2
Middle	90.1	94.7	91.1
Upper	5.9	5.0	4.8
Unknown	0.0	0.0	0.3
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, First Citizens' small business lending in low-income tracts was poor.

In 2018, the geographic distribution of the bank's small business lending in low-income census tracts was poor. First Citizens originated no small business loans in the assessment area's low-income census tract. The bank's lending level was below the 2018 aggregate small business lending level of 3%, and the percentage of small businesses located in low-income census tracts (2%).

In 2019, the geographic distribution of the bank's small business lending in low-income census tracts was poor. Again, First Citizens originated none of its small business loans in the assessment area's low-income census tract. The bank's lending level was below the 2019 aggregate small business lending level of 2%, and proxy of 3%.

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was poor. First Citizens originated less than 1% of its small business loans (one loan) in the assessment area's low-income census tract. The bank's lending level was below the 2020 aggregate small business lending level, and proxy, both of which were nearly 3%.

Lending in Moderate-Income Census Tracts

Similarly, First Citizens' small business lending in moderate-income tracts was poor for the period under review.

In 2018, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. First Citizens originated none of its small business loans in the assessment area's moderate-income census tract. The bank's lending level was below the 2018 aggregate small business lending level of 1%, and the proxy of almost 2%.

In 2019, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. Again, First Citizens originated none of its small business loans in the assessment area's moderate-income census tract. The bank's lending level was below the 2019 aggregate small business lending level of 1%, and the proxy of almost 2%.

Finally, in 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. As in other years, the bank did not originate any of its small business loans in the assessment area's moderate-income census tract. The bank's lending level was below the 2020 aggregate small business lending level, and proxy, both of which measures just over 1%.

Responsiveness to Credit Needs

First Citizens exhibits a good record of servicing the credit needs of low- and moderate-income borrowers and very small businesses, consistent with safe and sound banking practices. As mentioned previously, the primary community development needs mentioned by community contacts were affordable housing and lending to small businesses, particularly start-ups who lack a robust credit history.

In addition to responsiveness through its retail HMDA and small business lending, First Citizens has addressed both needs through the use of flexible lending programs, as well as community development loans. Both are discussed in more detail below.

Innovative and/or Flexible Lending Practices

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

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Northern Tier, PA assessment area, First Citizens participated in loan programs for first-time homebuyers through the Freddie Mac Home Possible Program, the FHA, the VA, and the USDA. During the evaluation period, First Citizens made six Home Possible loans totaling nearly \$690 thousand, two VA loans totaling over \$296 thousand, three FHA loans totaling \$344 thousand, and one USDA loan totaling \$133 thousand.

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, First Citizens participates in SBA loan programs, and is a preferred SBA Express Lender. During the evaluation period, First Citizens made 34 SBA loans totaling \$4.3 million in the Northern Tier, PA assessment area.

Community Development Lending

First Citizens makes an adequate level of community development loans in the assessment area. During the period evaluated, which included the timeframe between July 9, 2019, through March 28, 2022, the bank made 11 community development loans in the assessment area, totaling \$5.9 million. Of the bank's total community development lending by dollar volume, 68% was within the Northern Tier, PA assessment area.

First Citizens' community development lending increased from the previous evaluation, when four community development loans totaling \$1.9 million were reported.

Of the bank's eleven community development loans, three loans totaling nearly \$335 thousand (almost 6%) supported affordable housing initiatives for low- and moderate-income individuals. Four loans totaling \$969 thousand (17%) supported community services to low- and moderate-income individuals and areas. Finally, four loans totaling almost \$4.6 million (78%) supported economic development through the financing of small businesses and small farms.

The following table includes the bank's community development loans in the Northern Tier, PA assessment area, broken out by community development purpose.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank Northern Tier, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2019	0	0	0	0	1	1,140	0	0	1	1,140
2020	1	125	4	969	1	1,140	0	0	6	2,234
2021	1	107	0	0	1	1,140	0	0	2	1,247
2022	1	103	0	0	1	1,140	0	0	2	1,243
TOTAL	3	335	4	969	4	4,561	0	0	11	5,865

INVESTMENT TEST

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

Performance under the investment test is assessed as needs to improve.

Volume of Investment and Grant Activity

First Citizens has a poor level of qualified community development investments and donations. Qualified investments and donations for the Northern Tier, PA assessment area totaled \$294 thousand, which is below the investment level of \$855 thousand at the prior examination. Of the bank’s overall investments, under 5% were within the Northern Tier, PA assessment area.

Qualified investments totaling \$81 thousand (94%) supported an affordable housing project that will house low- and moderate-income seniors and disabled persons. The remaining \$5 thousand (6%) in qualified investments supported the provision of community development services to low- and moderate-income individuals through a Commonwealth of Pennsylvania Neighborhood Assistance Program (NAP) tax credit. The tax credit supported the construction of a new facility for an organization that provides food support to low- and moderate-income individuals in the assessment area.

In addition to the qualified investments discussed above, the bank also made 21 donations totaling \$208 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, \$203 thousand (97%) went to organizations that provided community services to low- and moderate-income individuals, and \$5 thousand (3%) supported economic development through the financing of small businesses and farms in the assessment area.

The following table presents the investment and grant activity for the Northern Tier, PA assessment area.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank Northern Tier, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	1	81	1	5	0	0	0	0	2	86
Donations	0	0	18	203	3	5	0	0	21	208
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	1	81	19	208	3	5	0	0	23	294

Responsiveness to Credit and Community Development Needs

First Citizens exhibits poor responsiveness to credit and community development needs of the assessment area. As mentioned previously, the level of qualified investments and grants dropped notably since the prior evaluation. Further, though community contacts indicated significant affordable housing and small business needs within the assessment area, the majority of investment and donation activity provided community services to low- and moderate-income individuals in the Northern Tier, PA assessment area (71%).

Community Development Initiatives

First Citizens makes occasional use of innovative and/or complex investments to support community development initiatives. In the Northern Tier, PA assessment area, the bank participated in a multi-year investment project centered on affordable housing that carried more complexity than simple donations. The other qualified investment was made through a NAP tax credit, which also carries more complexity than straightforward investment types or donations.

SERVICE TEST

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

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

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

Accessibility of Delivery Systems

Delivery systems are accessible to the bank’s geographies and individuals of different income levels in its assessment areas. During the review period, First Citizens operated 16 full-service branches in the Northern Tier, PA assessment area (53% of all branches). Using the 2015 ACS data, no branches were located in low- or moderate-income census tracts, while 15 branches (94%) were located in middle-income areas, and one branch (6%) was located in an upper-income tract.

The following table details the locations of the bank’s branches with comparison to 2015 ACS population demographics and shows that branches are proximate to areas where the majority of the population resides.

First Citizens Community Bank Northern Tier, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent of Population
Low	0	0.0	2,320	1.4
Moderate	0	0.0	2,960	1.8
Middle	15	93.8	147,033	91.1
Upper	1	6.2	9,190	5.7
Unknown Income	0	0.0	0	0.0
Totals	16	100.0	161,503	100.0

ATMs are available at all branch locations in the assessment area, which provides electronic access to banking services. To supplement traditional banking services, First Citizens provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes remote deposit capture capabilities. Customers can pay bills, open accounts and apply for loan products via the bank’s website at <https://www.firstcitizensbank.com>.

Changes in Branch Locations

First Citizens did not open or close any branches within the Northern Tier, PA assessment area during the evaluation period, and therefore this component of the service test was not considered in this assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned above, all of First Citizens’ branches in the assessment area include ATMs which are equipped with both English and Spanish languages. Of the 16 branches in the assessment area, 12 (75%) have drive-through facilities⁶.

⁶The following branches, all located in middle-income census tracts, do not have drive-through facilities: Genesee branch, located at 391 Main Street, Genesee, PA 16923; Gillett branch, located at 33178 Route 14, Gillett, PA 16925; Mansfield WalMart branch, located at 2 WalMart Plaza, Mansfield, PA 16933; and LeRaysville branch, located at 960 Main Street, LeRaysville, PA 18829.

All branches operate Monday through Friday, with extended hours at least one day a week. In addition, 12 of the bank's 16 branches offer Saturday morning hours⁷.

Bank Products

First Citizens offers a deposit product that provides greater access to banking services for low- and moderate-income customers. The bank's free checking account is a consumer account with no minimum daily balance requirement, and no monthly service fee. The account features unlimited check writing capabilities, free online, mobile and telephone banking, and a free debit card. A minimum \$50 deposit is required to open the account.

The bank also offers a low-cost small business checking account for small businesses with limited transaction activity. The account offers 400 free deposit items, and up to 50 paid checks with no monthly service charge if the monthly minimum average balance of \$500 is maintained, or if deposits of at least \$10 thousand are maintained between all accounts open at the bank. If neither minimum balance is met, the account is subject to a \$10 monthly fee. Finally, First Citizens offers cash management services, such as merchant card services to businesses, which allows them to accept payments from all major credit and debit cards, thus eliminating long waits between receivables and collecting NSF checks.

Community Development Services

First Citizens provides a relatively high level of community development services in this assessment area.

Over the evaluation period, numerous bank officers and employees provided qualified community development services, serving in various capacities on boards and committees, and providing technical assistance to community and economic development organizations.

Some notable examples included:

- The bank president and another bank employee hold board level roles at BOOM, an economic development organization focused on job creation, economic growth, community beautification, participation in regional planning, and the creation of partnerships for the greater Mansfield area.
- A bank employee is a director on the board of North Penn Comprehensive Health Services, which provides high-quality healthcare to patients regardless of their ability to repay.
- A bank employee is a director at Sayre Enterprise Center/Sayre Incubator Inc., a nonprofit business incubator dedicated to creating new jobs by facilitating start-up businesses.

⁷The following branches, three located in middle-income tracts, and one in an upper-income tract, do not offer Saturday hours: Gillett branch, located at 33178 Route 14, Gillett, PA 16925; LeRaysville branch, located at 960 Main Street, LeRaysville, PA 18829; Sayre Elmira Street Branch, located at 1778 Elmira Street, Sayre, PA 18840; and Rome branch, located at 847 Main Street, Rome, PA 15537.

- A bank employee serves on the board of Potter County Human Services Advisory Council, which provides transitional housing, childcare and other services to low- and moderate-income individuals.
- Two bank employees serve as chairman and director/secretary of the Bradford-Tioga Leased Housing Corporation, a non-profit that provides housing for low- and moderate-income individuals and disabled and elderly residents.
- One bank employee is a committee member and three bank employees are board members for Clinton County Economic Partnership, a non-profit organization that facilitates economic growth in Clinton County.
- A bank employee is the vice chairman on the board of Potter County Housing Services, which provides housing and rental assistance to low- and moderate-income families in Potter County.
- Three bank employees serve as board members for Develop Tioga (formerly Tioga County Industrial Development Corporation), an organization that fosters and promotes economic development in Tioga County.

Additionally, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative." Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to the FHLB of Pittsburgh, on their behalf.

LANCASTER, PA ASSESSMENT AREA / FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

The Lancaster, PA assessment area consists of the entirety of Lancaster County, which comprises the Lancaster, PA MSA.

For the purposes of assessing First Citizens' performance in the Commonwealth of Pennsylvania, the Lancaster, PA assessment area was given the least amount of weight, given its relatively limited operations in this assessment area, compared with the other Pennsylvania assessment areas. More specifically, of the bank's total loans, 5% by number and 8% by dollar volume were made within the assessment area. Further, the bank operated only two branches in the assessment area (7% of branches), which held \$49 million in deposits, or only 3% of total deposits as of June 30, 2021. Though the Lancaster, PA assessment area was not weighted as much as the other Pennsylvania assessment areas, a full-scope review was conducted, since the previous CRA evaluation included a limited-scope review of this assessment area.

First Citizens Community Bank's CRA performance in the assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Lancaster, PA assessment area consisted of 98 census tracts. Of these 98 tracts, six (6%) were designated as low-income, 14 (14%) were moderate-income, 67 (68%) were middle-income and 11 (11%) were upper-income. All of the low-income tracts, and eight of the moderate-income tracts were located in the city of Lancaster, the largest urban center in the assessment area.

A map of the Lancaster, PA assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, there were 23 depository institutions operating in the Lancaster, PA assessment area. These institutions maintained a total of 165 branches holding just under \$16 billion in deposits. First Citizens, with two branches in the assessment area, ranked twentieth, with less than 1% of the deposit market. Fulton Bank, N.A. led the market with 28% market share, followed by Truist Bank, with 16% of the market, and PNC Bank, N.A. with 12% of the market.

First Citizens reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to 2018 data, there were 377 HMDA reporters in the assessment area, who originated or purchased 15,673 loans in the Lancaster, PA assessment area. First Citizens tied for fifty-sixth, with less than 1% of the HMDA market. Fulton Bank, N.A. ranked first, with almost 9% market share, followed by Wells Fargo Bank, N.A. (nearly 8%), and Members 1st Federal Credit Union (7%).

According to 2019 data, there were 404 HMDA reporters who originated or purchased 17,218 loans in the Lancaster, PA assessment area. First Citizens tied for seventieth, with less than 1% of the HMDA market. Once again, Fulton Bank, N.A., Wells Fargo Bank, N.A., and Members 1st Federal Credit Union ranked first, second and third, with 8%, 7%, and 7% of the market, respectively.

Finally, in 2020, 319 HMDA reporters originated or purchased 7,689 loans within the assessment area. First Citizens ranked twenty-third, with just over 1% of the HMDA market. Quicken Loans, LLC led the market, with 6% market share, followed by Members 1st Federal Credit Union, and Fulton Bank, N.A., each of whom controlled just under 6% of the HMDA market.

Similarly, the bank reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2018 data, there were 95 CRA small business and small farm reporters in the assessment area, who originated or purchased a total of 12,429 CRA loans. First Citizens tied for twenty-fifth, with less than 1% of the CRA market. Branch Banking and Trust Company led reporters, controlling nearly 12% of the market, followed by American Express, NB (11%), and US Bank, N.A. (10%).

In 2019, 104 CRA reporters originated or purchased 12,816 loans. First Citizens ranked twenty-seventh, with less than 1% market share. JP Morgan Chase Bank, N.A. ranked first, with 13% market share, followed by American Express, NB (11%), and US Bank, N.A. (9%).

Finally, in 2020, there were 94 small business and small farm reporters who originated or purchased 3,661 CRA loans. First Citizens' market share increased notably, with the bank ranking fourth, with a market share of nearly 6%. Fulton Bank, N.A. led the CRA market, with 16% of CRA loans, followed by American Express, NB (9%), and Synchrony Bank (almost 8%).

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit needs of the Lancaster, PA assessment area. One interview was held with an affordable housing agency, and the other was with an organization that focused on workforce development.

Community contacts noted growth in the local economy, which has created job opportunities for residents. Growth has also spurred revitalization efforts in downtown Lancaster, particularly in the Southwest portion of the city. Affordable housing is a concern for the assessment area, and contacts speculate that with the foreclosure moratorium coming to a close, affordability will become even more of an issue. One of the contacts indicated that the availability of small business credit to women and minorities is a concern, particularly as bank branches in the area continue to close. Finally, contacts mentioned needs for financial literacy training and other community services, such as mental health services.

Economic Characteristics

As indicated above, the Lancaster, PA assessment area consists entirely of Lancaster County, Pennsylvania, and is situated in the south-central part of the Commonwealth of Pennsylvania, located approximately 40 miles southeast of Harrisburg, and 80 miles west of Philadelphia. The city of Lancaster is the largest urban center in the MSA, and serves as the county seat.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

According to Moody’s Analytics January 2022 Precis report, the assessment area is in recovery mode. In the wake of the pandemic, factories in the assessment area had particularly strong performance, with employment growing faster than in Pennsylvania and the U.S. in the second half of 2021. Additionally, employment gains in the healthcare industry also help to spur Lancaster’s economy. According to Moody’s the MSA’s housing market is strong, a sentiment echoed by community contacts, who noted an influx of new residents from higher-cost areas nearby, such as Philadelphia, Washington, D.C. and New York.

According to Moody’s, strengths of the Lancaster, PA assessment area are its proximity to major East Coast metro areas, a well-diversified economy for its size, an equal distribution of income, and a strong rate of business formation. However, area weaknesses include a reliance on traditional manufacturing, low per capita income and education levels, and low worker productivity.

The largest industry in the Lancaster MSA is education and health services, which represents 19% of the assessment area’s employment. Manufacturing accounts for almost 15% of the MSA’s employment, followed by retail trade (12%) and professional and business services (10%). According to Moody’s Analytics, the top employers in the Lancaster, PA MSA are Lancaster General Hospital, Giant Food Stores, LLC., Eurofins Lancaster Laboratories, Inc., High Companies, and Masonic Villages at Elizabethtown.

During the evaluation period, unemployment rates increased, though they consistently stayed below those in the Commonwealth and nation as a whole. The seasonally unadjusted unemployment rates for the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table, in comparison with the rates for the Commonwealth of Pennsylvania and the nation as a whole for 2018 through 2020.

First Citizens Community Bank Lancaster, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	% 2018 Annual	% 2019 Annual	% 2020 Annual
Lancaster County, PA	3.5	3.5	7.5
Lancaster PA MSA	3.5	3.5	7.5
Commonwealth of Pennsylvania	4.5	4.5	9.1
United States	3.9	3.7	8.1

Unemployment data is from the Bureau of Labor Statistics.

Housing

According to 2015 ACS data, the Lancaster, PA assessment area contained 205,587 housing units, 65% of which were owner-occupied, 30% of which were rentals, and 5% of which were vacant. The overall owner-occupancy rate in the Commonwealth of Pennsylvania, which was 61%.

The distribution of owner-occupied units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending within such census tracts. According to 2015 ACS data, of the 134,548 owner-occupied housing units in the Lancaster, PA assessment area, under 2% were located in low-income census tracts, and 9% were in moderate-income tracts. The majority of owner-occupied units were located in middle-income tracts (76%), and almost 14% were located in upper-income tracts.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

Of the total existing housing units, 76% were single family units, 8% were two-to-four family units, 12% were multifamily units (five or more families), and 4% were mobile homes. The median age of housing in the assessment area was 47 years, making it slightly younger than the housing stock statewide (54 years).

Data show that the cost of housing was more expensive in the assessment area (\$189,229) than in the Commonwealth of Pennsylvania overall (\$166,000). Further, data shows a disparity in housing values in low- and moderate-income census tracts compared to those in middle- and upper-income tracts. Within the assessment area, the median housing value was \$85,882 in low-income tracts, and \$114,714 in moderate-income tracts. These values were significantly lower than the median housing values in middle- and upper-income tracts (\$193,421 and \$229,686, respectively).

Finally, median gross rent (rent plus utilities) in the assessment area was more expensive than Pennsylvania. Median gross rent in the Lancaster, PA assessment area was \$909, which was more than in the Commonwealth, at \$840. Within the assessment area, nearly 49% of renters spent more than 30% of their monthly income on rent, compared to a measure of 46% for the state as a whole.

Borrower Income Data

The percentages of low- and moderate-income families in an assessment area are used as proxies to estimate demand for home-mortgage lending. The 2015 ACS data revealed that there were 137,133 families in the assessment area, 18% of which were designated as low-income, 19% of which were moderate-income, 23% of which were middle-income, and just under 40% of which were upper-income. Families living below the poverty line represented 7% of families in the assessment area, compared to 9% for the Commonwealth of Pennsylvania.

For the purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon annually-adjusted median family income data made available by the FFIEC. Median family incomes for the assessment area are listed in the table below for each of the years covered by the evaluation, and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2018	\$73,800	\$36,900	\$36,900 - \$59,039	\$59,040 - \$88,559	\$88,560 or more
2019	\$76,200	\$38,100	\$38,100 - \$60,959	\$60,960 - \$91,439	\$91,440 or more
2020	\$79,500	\$39,750	\$39,750 - \$63,599	\$63,600 - \$95,399	\$95,400 or more

Geographic Business Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

According to 2018 business data provided by Dun & Bradstreet, there were 24,426 businesses in the Lancaster, PA assessment area. 4% of the assessment area's businesses were located in low-income tracts, 11% were located in moderate-income tracts, almost 74% were located in middle-income tracts, and 12% were located in upper-income tracts. Business demographic data also revealed that of the 24,426 businesses in the assessment area, 90% were small businesses with gross annual revenues of \$1 million or less.

In 2019, there were 24,444 businesses in the Lancaster, PA assessment area. Of these, 4% were located in low-income tracts, 11% were located in moderate-income tracts, almost 74% were located in middle-income tracts, and 12% were located in upper-income tracts. During 2018, 90% of businesses were small businesses with gross annual revenues of \$1 million or less.

Finally, according to 2020 business demographics, there were 24,850 businesses in the Lancaster, PA assessment area. As in prior years, of these total businesses, 4% were located in low-income tracts, 11% were located in moderate-income tracts, almost 74% were located in middle-income tracts, and 12% were located in upper-income tracts. In 2020, of the 24,850 businesses in the assessment area, 90% were small businesses with gross annual revenues of \$1 million or less.

Assessment area demographics used in evaluating First Citizens' performance under the CRA in the Lancaster, PA assessment area in 2018, 2019 and 2020 are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Lancaster, PA MSA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.7	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	98	100.0	137,133	100.0	9,994	7.3	137,133	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	205,587	134,548	100.0	65.4	60,782	29.6	10,257	5.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	984	4.0	883	4.0	92	4.2	9	3.5
Moderate-income	2,678	11.0	2,359	10.7	295	13.5	24	9.4
Middle-income	17,961	73.5	16,200	73.6	1,567	71.5	194	76.4
Upper-income	2,821	11.5	2,556	11.7	238	10.8	27	10.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	24,444	100.0	21,998	100.0	2,192	100.0	254	100.0
Percentage of Total Businesses:			90.0		9.0		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	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	5	0.5	5	0.5	0	0.0	0	0.0
Middle-income	940	89.7	904	89.5	36	94.7	0	0.0
Upper-income	101	9.6	99	9.8	2	5.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,048	100.0	1,010	100.0	38	100.0	0	0.0
Percentage of Total Farms:			96.4		3.6		0.0	

2015 ACS Data and 2019 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Lancaster, PA MSA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.7	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	98	100.0	137,133	100.0	9,994	7.3	137,133	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	205,587	134,548	100.0	65.4	60,782	29.6	10,257	5.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	991	4.0	894	4.0	88	4.1	9	3.5
Moderate-income	2,713	10.9	2,402	10.7	287	13.4	24	9.3
Middle-income	18,267	73.5	16,541	73.7	1,531	71.5	195	75.6
Upper-income	2,879	11.6	2,614	11.6	235	11.0	30	11.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	24,850	100.0	22,451	100.0	2,141	100.0	258	100.0
Percentage of Total Businesses:			90.3		8.6		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	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	6	0.6	6	0.6	0	0.0	0	0.0
Middle-income	936	90.2	903	90.0	33	94.3	0	0.0
Upper-income	94	9.0	92	9.2	2	5.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,038	100.0	1,003	100.0	35	100.0	0	0.0
Percentage of Total Farms:			96.6		3.4		0.0	

2015 ACS Data and 2020 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

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

Performance under the lending test is rated low satisfactory in Lancaster, PA assessment area.

Lending Activity

First Citizens' lending levels in the Lancaster, PA assessment area reflect adequate responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Lancaster, PA assessment area represented 5% of the bank's overall lending by number of loans, and 8% by dollar volume. During the evaluation period, First Citizens made 74 HMDA loans totaling \$22 million, and 52 small business loans totaling \$9 in the Lancaster, PA assessment area.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance. Further, due to loan volumes, HMDA loans are given more weight in determining the bank's overall borrower distribution of loans, followed by small business loans.

Home-Mortgage Lending

First Citizens' distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is adequate.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area.

As noted previously, according to the 2015 ACS data, approximately 18% of assessment area families were low-income, 19% were moderate-income, 23% were middle-income, and nearly 40% were upper-income. According to 2015 ACS data, close to 38% of families were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

The following tables compare First Citizens’ home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The tables, used to evaluate lending for all years in the evaluation period, rely on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data, following the requirements of Regulation C.

First Citizens Community Bank Lancaster, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level							
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison					
		2018		2019		2020	
		% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending
Low	18.3	0.0	6.7	15.8	6.8	0.0	6.6
Moderate	19.2	12.9	22.1	26.3	20.9	20.8	19.3
Middle	23.1	12.9	23.9	15.8	25.2	12.5	22.5
Upper	39.4	45.2	35.7	15.8	35.5	25.0	32.7
Unknown	0.0	29.0	11.6	26.3	11.6	41.7	18.9
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, First Citizens’ lending to low-income borrowers was poor.

In assessing the level of the bank’s lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

First Citizens’ lending in 2018 to low-income borrowers was very poor. None of the bank’s HMDA loans were originated to low-income borrowers, which was below the aggregate lending level of 7%, and the proxy of 18%. By loan type, aggregate lenders made 7% of home purchase loans, 8% of refinance loans, 5% of home improvement loans, no multifamily loans, and less than 1% of loans with purpose “not applicable” to low-income borrowers in 2018.

First Citizens' lending in 2019 to low-income borrowers was good. In total, 16% of the bank's HMDA loans (three loans) were originated to low-income borrowers, which was above the aggregate lending level of 7%, but below proxy of 18%. By loan category, all three HMDA loans originated to low-income borrowers were home purchase loans. In comparison, aggregate lenders made 7% of home purchase loans, 7% of refinance loans, 6% of home improvement loans, no multifamily loans, and less than 1% of loans with purpose "not applicable" to low-income borrowers in 2019.

Finally, First Citizens' lending in 2020 to low-income borrowers was very poor. In total, none of the bank's HMDA loans were originated to low-income borrowers, which was below the aggregate lending level of 7%, and below the proxy of 18%. By product type, aggregate lenders made 10% of home purchase loans, 4% of refinance loans, 6% of home improvement loans, 2% of multifamily loans, and less than 1% of loans with purpose "not applicable" to low-income borrowers in 2020.

Lending to Moderate-Income Borrowers

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

First Citizens' lending in 2018 to moderate-income borrowers was adequate. In total, 13% of the bank's HMDA loans (four loans) were originated to moderate-income borrowers. The bank's performance was below the aggregate lending level of 22%, and the proxy of 19%. By loan category, First Citizens originated 21% of its home purchase loans (three loans), 100% of its other purpose closed/exempt loans (one loan), and none of its refinance loans, home improvement loans, multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 25% of home purchase loans, 22% of refinance loans, 17% of home improvement loans, 2% of multifamily loans, , 19% of other purpose closed/exempt, and 1% of loans with purpose "not applicable" to moderate-income borrowers in 2018.

First Citizens' lending in 2019 to moderate-income borrowers was excellent. In total, 26% of the bank's HMDA loans (five loans) were originated to moderate-income borrowers, which was above the aggregate lending level of 21%, and above proxy of 19%. By loan category, First Citizens originated 33% of its home purchase loans (four loans), 33% of its refinance loans (one loan), and no home improvement loans, multifamily loans, or- loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 24% of home purchase loans, 19% of refinance loans, 18% of home improvement loans, 2% of multifamily loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2019.

First Citizens' lending in 2020 to moderate-income borrowers was good. In total, 21% of the bank's HMDA loans (five loans) were originated to moderate-income borrowers, which was above the aggregate lending level and proxy, both of which measured 19%. By loan category, First Citizens originated 38% of its home purchase loans (three loans), 8% of its refinance loans (one loan), 100% of other purpose closed/exempt loans (one loan), and no home improvement loans, multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 26% of home purchase loans, 15% of refinance loans, 17% of home improvement loans, 21% of other purpose closed/exempt, and no multifamily or loans with purpose "not applicable" to moderate-income borrowers in 2020.

Small Business Lending

An analysis of First Citizens' borrower distribution of small business loans reflects adequate 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 analyzed to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the Lancaster, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to 2018 available Dun & Bradstreet business demographic data, there were 24,426 businesses in the assessment area, with 90% designated as small businesses. In 2019, there were 24,444 businesses in the assessment area, 90% of which were small businesses. In 2020, there were 24,850 businesses in the assessment area, 90% of which were small businesses.

In 2018, the bank's borrower distribution of small business loans was good. In 2018, First Citizens originated 10 small business loans within the assessment area, aggregating just over \$1 million. Of these loans, 70% were originated to small businesses (seven loans). This performance was above the aggregate lending level of 50% to small businesses, and below the proxy of 90%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus, added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2018, 60% of First Citizens' small business loans were extended in amounts of \$100 thousand or less (six loans). Aggregate data indicates that 90% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2019, the bank's borrower distribution of small business loans was adequate. In 2019, First Citizens originated 12 small business loans within the assessment area, aggregating \$2.3 million. Of these loans, 58% were originated to small businesses (seven loans). This performance was above the aggregate lending level of 48% to small businesses, and below the proxy of 90%. In 2019, 50% of First Citizens' small business loans were extended in amounts of \$100 thousand or less (six loans). Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Finally, in 2020, the bank's borrower distribution of small business loans was adequate. In 2020, First Citizens originated 30 small business loans within the assessment area, aggregating nearly \$5.7 million. Of these loans, 30% were originated to small businesses (nine loans). This performance was below the aggregate lending level of 43% to small businesses, and below the proxy of 90%.⁸

⁸Notably, in 2020, 50% of small business loans in the assessment area were originated to businesses of unknown income (15 loans). This is attributable to the bank's participation in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provided small businesses with funds to pay up to eight weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. Under this program, institutions were not required to collect revenue information. For context, on the entire First Citizens' 2020 CRA LAR, 59% of the reported loans were PPP loans which were reported without revenue (584 loans).

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

In 2020, 57% of First Citizens’ small business loans were extended in amounts of \$100 thousand or less (17 loans). In comparison, aggregate data indicates that 87% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects good penetration throughout the Lancaster, PA assessment area, including low- and moderate-income tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount, followed by small business loans. Further, given the demographics of the assessment area, more weight was given to the bank’s lending in moderate-income tracts.

Home-Mortgage Lending

First Citizens’ distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts was good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending 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 2015 ACS data, less than 2% of the assessment area’s owner-occupied housing was located in low-income census tracts, and 9% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (76% and almost 14%, respectively).

The following table presents First Citizens’ geographic distribution of HMDA loans from 2018 to 2020, in comparison to the applicable owner-occupied housing proxy and the aggregate lending levels in the assessment area. The tables used for lending in all three covered years rely on the 2015 ACS data, along with update HMDA data, following the requirements of Regulation C.

First Citizens Community Bank Lancaster, PA Assessment Area Geographic Distribution of HMDA Loans							
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison					
		2018		2019		2020	
		% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending
Low	1.6	0.0	2.3	5.3	2.2	4.2	0.9
Moderate	8.8	25.8	10.6	15.8	10.5	20.8	8.9
Middle	76.1	71.0	73.5	73.6	73.0	70.8	65.7
Upper	13.5	3.2	13.6	5.3	14.3	4.2	24.5
Unknown	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Lending in Low-Income Census Tracts

For the period under review, First Citizens' overall HMDA lending in low-income tracts was adequate.

First Citizens' lending in low-income census tracts in 2018 was poor. None of First Citizens' HMDA loans were originated in low-income tracts in 2018, which was below the aggregate lending level and proxy, both of which were 2%. By product type, aggregate 2018 lenders made 3% of home purchase loans, 2% of refinance loans, 1% of home improvement loans, 13% of multifamily loans, and 3% of loans with purpose "not applicable" in low-income tracts in the assessment area.

First Citizens' lending in low-income census tracts in 2019 was adequate. First Citizens originated 5% of HMDA loans (one loan) in a low-income tract in 2019, which was above the aggregate lending level and proxy, both of which were 2%. Categorized by loan type, the bank's loan in a low-income tract was a multifamily loan. Aggregate 2019 lending data show that 3% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 8% of multifamily loans, and 6% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

First Citizens' lending in low-income census tracts in 2020 was adequate. First Citizens originated 4% of HMDA loans (one loan) in a low-income tract in 2020, which was above the aggregate lending level of 1%, and proxy, which measured 2%. Categorized by loan product type, the bank's HMDA loan located in a low-income tract was a multifamily loan. Aggregate 2020 lending data show that 2% of home purchase loans, less than 1% of refinance loans, 1% of home improvement loans, 9% of multifamily loans, less than 1% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

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

First Citizens' lending in moderate-income census tracts in 2018 was excellent. In 2018, First Citizens' HMDA lending in moderate-income tracts was 26% (eight loans), which measured well above the aggregate performance of 11% and proxy of owner-occupied housing units, of 9%. Categorized by loan product type, First Citizens made 36% of its home purchase loans (five loans), 27% of refinance loans (three loans), and no home improvement, multifamily, or loans with purpose "not applicable" in moderate-income tracts in 2018. Aggregate lending data shows that 13% of home purchase loans, 8% of refinance loans, 7% of home improvement loans, 20% of multifamily loans, and 18% of its loans with purpose "not applicable" were made in moderate-income tracts in the assessment area in 2018.

First Citizens' lending in moderate-income census tracts in 2019 was excellent. In 2019, First Citizens' HMDA lending in moderate-income tracts was 16% (three loans), which measured well above the aggregate performance of 11% and proxy of 9%. By loan type, First Citizens made 17% of its home purchase loans (two loans), 33.3% of refinance loans (one loan), and no home improvement, multifamily, or loan with purpose "not applicable" in moderate-income tracts in 2019. Aggregate lending data shows that 13% of home purchase loans, 8% of refinance loans, 8% of home improvement loans, 27% of multifamily loans, and 16.1% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area in 2019.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens’ lending in moderate-income census tracts in 2020 was excellent. In 2020, First Citizens’ HMDA lending in moderate-income tracts was 21% (five loans), which measured well above the aggregate lending performance and proxy, both of which measured 9%. Categorized by loan product type, First Citizens made 13% of its home purchase loans (one loan), 31% of refinance loans (four loans), and no home improvement, multifamily, or loans with purpose “not applicable” in moderate-income tracts in 2020. By comparison, aggregate lending data shows that 13% of home purchase loans, 5% of refinance loans, 7% of home improvement loans, 36% of multifamily loans, and 13% of loans with purpose “not applicable” were made in moderate-income tracts in the assessment area in 2020.

Small Business Lending

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

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. According to Dun & Bradstreet data in 2018, there were 24,426 businesses in the assessment area. Of these businesses, 4% were located in low-income tracts, and 11% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (74% and almost 12%, respectively). Very little change in the demographic distribution of small businesses was realized in the other two data years.

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

First Citizens Community Bank Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2018	
		% First Citizens Lending	% Aggregate Lending
Low	4.0	0.0	3.1
Moderate	10.9	20.0	9.2
Middle	73.5	70.0	74.7
Upper	11.6	10.0	12.2
Unknown	0.0	0.0	0.8
Total	100.0	100.0	100.0

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans				
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison		
		2019		
		% First Citizens Lending	% Aggregate Lending	
Low	4.0	0.0	3.2	
Moderate	11.0	8.3	9.8	
Middle	73.5	91.7	72.3	
Upper	11.5	0.0	13.8	
Unknown	0.0	0.0	0.9	
Total	100.0	100.0	100.0	

First Citizens Community Bank Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans				
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison		
		2020		
		% First Citizens Lending	% Aggregate Lending	
Low	4.0	3.3	3.6	
Moderate	10.9	10.0	10.6	
Middle	73.5	80.0	73.4	
Upper	11.6	6.7	12.2	
Unknown	0.0	0.0	0.2	
Total	100.0	100.0	100.0	

Lending in Low-Income Census Tracts

First Citizens' small business lending in low-income tracts was poor.

In 2018, the geographic distribution of the bank's small business lending in low-income census tracts was poor. First Citizens originated none of its small business loans in the assessment area's low-income census tracts. The bank's lending level was below the aggregate small business lending level of 3%, and the proxy of small businesses located in low-income tracts, at 4%.

In 2019, the geographic distribution of the bank's small business lending in low-income census tracts was poor. First Citizens originated none of its small business loans in the assessment area's low-income census tracts. The bank's lending level was below the 2019 aggregate small business lending level of 3%, and proxy of 4%.

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. First Citizens originated 3% of its small business loans (one loan) in a low-income census tract. The bank's lending level was below the 2020 aggregate small business lending level and proxy, both of which were 4%.

Lending in Moderate-Income Census Tracts

First Citizens' small business lending in moderate-income tracts was adequate.

In 2018, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. First Citizens originated 20% of its small business loans (two loans) in the assessment area's moderate-income census tracts. The bank's lending level exceeded both the 2018 aggregate small business lending level of 9%, and the proxy of businesses located in moderate-income tracts, of 11%.

In 2019, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. First Citizens originated 8% of its small business loans (one loan) in a moderate-income census tract. The bank's lending level was below the 2019 aggregate small business lending level of 10%, and the proxy of 11%.

Finally, in 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. First Citizens originated 10% of its small business loans (three loans) in the assessment area's moderate-income census tracts. The bank's lending level was just below the 2020 aggregate small business lending level and proxy, both of which were 11%.

Responsiveness to Credit Needs

First Citizens exhibits an adequate record of servicing the credit needs of low- and moderate-income individuals and very small businesses, consistent with safe and sound banking practices.

Community contacts identified affordable housing for both rent and purchase, revitalization efforts, both in downtown Lancaster, and in more rural low- and moderate-income geographies in the county, and small business credit as specific needs within the Lancaster, PA assessment area.

In addition to responsiveness through its retail HMDA and small business lending, the bank has addressed affordable housing, small business lending and revitalization/stabilization efforts through the use of flexible lending programs and community development lending, both of which are discussed in greater detail below.

Innovative and/or Flexible Lending Practices

First Citizens makes little use of innovative and/or flexible lending practices in serving the Lancaster, PA assessment area credit needs.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Lancaster, PA assessment area, the bank made one Freddie Mac Home Possible loan totaling just over \$184 thousand.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, First Citizens participates in SBA loan programs, and is a preferred SBA Express Lender. During the evaluation period, First Citizens made four SBA loans totaling almost \$487 thousand.

Community Development Lending

First Citizens makes a low level of community development loans in the assessment area. During the period evaluated, which included the timeframe between July 9, 2019, through March 28, 2022, the bank made two community development loans in the assessment area, totaling \$965 thousand. First Citizens’ community development lending showed an increase from the previous examination when community development loans totaled \$500 thousand (one loan). Of the bank’s total community development lending by dollar volume, 11% was within the Lancaster, PA assessment area.

One of the two loans, totaling \$715 thousand (74%) supported revitalization/stabilization of a low-income tract within the assessment area. The other loan totaling \$250 thousand (26%) supported affordable housing initiatives for low- and moderate-income individuals.

The following table includes the bank’s community development loans in the Lancaster, PA assessment area, broken out by community development purpose.

First Citizens Community Bank Lancaster, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2019	0	0	0	0	0	0	0	0	0	0
2020	1	250	0	0	0	0	0	0	1	250
2021	0	0	0	0	0	0	1	7150	1	715
2022	0	0	0	0	0	0	0	0	0	0
TOTAL	1	250	0	0	0	0	1	715	2	965

INVESTMENT TEST

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

Performance under the investment test is assessed as low satisfactory.

Volume of Investment and Grant Activity

First Citizens has an adequate level of qualified community development investments and grants, rarely in a leadership position. Qualified investments and donations for the Lancaster, PA assessment area totaled \$1.28 million, which is well above the investment level of \$52 thousand at the prior examination. Of the bank’s overall investments, 20% were within the Lancaster, PA assessment area.

Investments totaling just over \$1.17 million supported affordable housing initiatives (99%), through a Freddie Mac mortgage-backed security loan pool, and an investment of \$10 thousand (1%) supported economic development in the assessment area.

The bank also made a total of 36 donations totaling nearly \$112 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, over 16% supported affordable housing (five donations totaling \$18 thousand), 65% was to organizations that provide community services to low- and moderate-income individuals (26 donations totaling nearly \$73 thousand), 14% supported economic development (four donations totaling almost \$16 thousand), and the remaining 4% supported revitalization and stabilization efforts in the assessment area (one donation for \$5 thousand).

The following table presents the investment and grant activity for the Lancaster, PA assessment area.

First Citizens Community Bank Lancaster PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	1	1,156	0	0	1	10	0	0	2	1,166
Donations	5	18	26	73	4	16	1	5	36	112
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	6	1,174	26	73	5	26	1	5	38	1,278

Responsiveness to Credit and Community Development Needs

First Citizens exhibits good responsiveness to credit and community development needs of the assessment area. As indicated previously, community contacts identified affordable housing as a pronounced community need in the Lancaster, PA assessment area. As noted above, the overwhelming majority of the bank’s investment dollars in this assessment area addressed affordable housing needs.

Community Development Initiatives

First Citizens makes occasional use of innovative and/or complex investments to support community development initiatives. In the Lancaster, PA assessment area, the bank participated in a mortgage-backed security that carried more complexity than simple donations. This project, centered on affordable housing, represented 99% of the investment dollars deployed in this assessment area.

SERVICE TEST

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

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

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

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in its assessment areas. During the review period, First Citizens operated two full-service branches in the Lancaster, PA assessment area (almost 7% of total branches). Using the 2015 ACS data, no branches were located in low- or moderate-income census tracts. Instead, both branches (100%) were located in middle-income areas.

The following table details the locations of the bank’s branches with comparison to 2015 ACS population demographics.

First Citizens Community Bank Lancaster, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent of Population
Low	0	0.0	22,775	4.3
Moderate	0	0.0	56,045	10.6
Middle	2	100.0	390,040	73.5
Upper	0	0.0	61,356	11.6
Unknown Income	0	0.0	0	0.0
Totals	2	100.0	530,216	100.0

ATMs are available at both branch locations in the assessment area, which provides electronic access to banking services. To supplement traditional banking services, First Citizens provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes remote deposit capture capabilities. Customers can pay bills, open accounts and apply for loan products via the bank’s website at <https://www.firstcitizensbank.com>.

Changes in Branch Locations

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

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned above, both of First Citizens' branches in the assessment area include ATMs which are equipped with both English and Spanish languages. Of the two branches in the assessment area, one (50%) has a drive-through facility⁹. All branches operate Monday through Friday, with extended hours on Thursday and/or Friday. In addition, one of the bank's two branches offer Saturday morning hours¹⁰.

Bank Products

First Citizens offers a deposit product that provides greater access to banking services for low- and moderate-income customers. The bank's free checking account is a consumer account with no minimum daily balance requirement, and no monthly service fee. The account features unlimited check writing capabilities, free online, mobile and telephone banking, and a free debit card. A minimum \$50 deposit is required to open the account.

The bank also offers a low-cost small business checking account for small businesses with limited transaction activity. The account offers 400 free deposit items, and up to 50 paid checks with no monthly service charge if the monthly minimum average balance of \$500 is maintained, or if deposits of at least \$10 thousand are maintained between all accounts open at the bank. If neither minimum balance is met, the account is subject to a \$10 monthly fee. The bank charges twenty-five cents each for additional item. This account allows very small businesses access to banking services. Finally, First Citizens offers cash management services, such as merchant card services, which allows businesses to accept payments from all major credit and debit cards, thus eliminating long waits between receivables and collecting NSF checks.

Community Development Services

First Citizens provides an adequate level of community development services in this assessment area.

Over the evaluation period, bank officers and employees served in various capacities on boards of community development organizations, participated on loan and finance committees, and provided technical assistance to four community development organizations. It is noted that the bank's CRA/Fair Lending Officer works near this assessment area, and plays a key role in providing community development services on behalf of the bank. Some notable examples include:

⁹The Fivepoint branch, located at 1015 Dry Tavern Road, Denver, PA 17517 does not have a drive-through facility.

¹⁰The Mount Joy branch, located at 720 East Main Street, Mount Joy, PA 17552 does not offer Saturday hours.

- The CRA/Fair Lending officer served on a number of committees at Tenfold, a Community Development Finance Institution (CDFI) that provides lending to support the building of affordable housing, as well as workshops and financial counseling services, and emergency housing for low- and moderate-income individuals in the assessment area.
- A bank employee serves as the Secretary on the board of Main Street Mount Joy, an organization that provides a variety of services to small businesses in the assessment area, in hopes of assisting and attracting new businesses, and retaining existing small businesses.
- A bank employee serves as a board member for Archie’s Math, which is a part of Lancaster Science Factory. Archie’s Math and the Lancaster Science Factory offers free hands-on educational programs to area students, with the majority of children served being low-or moderate-income students.

Additionally, the bank participates as an intermediary for the FHLB of Pittsburgh’s “Home4Good Initiative.” Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to the FHLB of Pittsburgh, on their behalf.

LEBANON, PA ASSESSMENT AREA / LIMITED-SCOPE REVIEW

A limited-scope review of the bank’s performance in the Lebanon, PA assessment area was conducted. For the purposes of assessing First Citizens’ performance in the Commonwealth of Pennsylvania, the Lebanon, PA assessment area was given the second highest weight, behind the Northern Tier, PA assessment area, given the bank’s volume of loans, deposits and operations in this assessment area. More specifically, during the evaluation period, lending activity in the Lebanon, PA assessment area represented 17% of the bank’s overall lending by both number and dollar amount. The assessment area’s six branches (20% of total branches) hold about \$350 million in deposits, or almost 21% of the bank’s total deposits as of June 30, 2021. Though this assessment area was given the second greatest weight in determining the statewide rating, it was evaluated using limited-scope review procedures, as a full-scope review was conducted at the previous CRA evaluation.

The bank’s performance in the Lebanon, PA assessment area exceeds its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, including performance and demographic information, are presented in the tables located in the Appendices. Conclusions regarding performance are as follows:

ASSESSMENT AREA	LENDING TEST	INVESTMENT TEST	SERVICE TEST
Lebanon, PA Assessment Area	Exceeds	Exceeds	Consistent

DESCRIPTION OF INSTITUTION’S OPERATIONS

The bank’s Lebanon, PA assessment area consists of the entirety of Lebanon County, PA, which is coterminous with the Lebanon, PA MSA. Additionally, this assessment area includes three census tracts in Berks County, PA, a partial portion of the Reading, PA MSA, and seven census tracts in Schuylkill County, PA, a partial portion of the Pottsville, PA Micropolitan Statistical Area.

According to 2015 ACS Data, the assessment area consisted of 41 census tracts, one (2%) of which was designated as low-income, six (15%) of which were moderate-income, 27 (66%) of which were middle-income, and seven (17%) of which were upper-income. The low-income tract, and five of the six moderate-income tracts were located in the city of Lebanon. The remaining moderate-income tract was located in the borough of Palmyra. 2015 ACS data indicated that the assessment area had a population of 185,313.

A map of the Lebanon, PA assessment area using 2015 ACS data is available in Appendix F.

First Citizens’ performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC’s Deposit Market Share Report, as of June 30, 2021, there were 23 depository institutions operating in the assessment area. These institutions maintained a total of 186 branches, holding approximately \$25 billion in deposits. First Citizens Community Bank ranked twelfth, holding just over 1% of the market share. Customers Bank has a strong presence in the market, ranking first, with nearly 25%, followed by Santander Bank, N.A., with 21% of the market, and Wells Fargo Bank, N.A. with over 11%.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

Similarly, First Citizens was a relatively minor player in the HMDA market, holding only about 1% of the market in 2018, 2019, and 2020. In 2018, a total of 274 HMDA reporters originated or purchased a total of 5,437 HMDA loans. First Citizens ranked twenty-third in the HMDA market with 1% market share. Fulton Bank, N.A. led the market with 10% of HMDA loans, followed by Wells Fargo Bank, N.A. (nearly 7%) and Members 1st Federal Credit Union (6%).

In 2019, 294 HMDA reporters originated or purchased a total of 5,981 HMDA loans. First Citizens ranked twenty-fourth, with 1% of the HMDA market. Once again, Fulton Bank, N.A. led the market (just over 9%), followed by Members 1st Federal Credit Union (7%) and Wells Fargo Bank, N.A. (nearly 6%).

Finally, in 2020, 319 HMDA reporters originated or purchased a total of 7,689 HMDA loans. First Citizens ranked twenty-third, with 1% of the market. Quicken Loans, LLC led the market with 6% of loans, followed by Members 1st Federal Credit Union, and Fulton Bank, N.A., both of which controlled nearly 6% of the market.

With regard to small business and small farm lending, in 2018, a total of 71 CRA data reporters originated or purchased 3,021 CRA loans in the Lebanon, PA assessment area. First Citizens ranked eighth, with almost 5% market share. U.S. Bank, N.A. led the market with just over 13% market share, followed by American Express, NB (11%) and Chase Bank USA, N.A. (9%).

In 2019, 75 CRA reporters originated or purchased 3,252 small business and small farm loans in the assessment area. First Citizens ranked tenth with nearly 3% of the market. JP Morgan Chase Bank, N.A. ranked first with 13%, followed by U.S. Bank, N.A. (12%) and American Express, NB (12%).

Finally, in 2020, a total of 94 CRA reporters originated or purchased 3,661 loans in the assessment area. First Citizens substantially increased their CRA market share in 2020, ranking fourth with almost 6% of the market. Fulton Bank, N.A. ranked first with 16% market share, followed by American Express, NB (9%) and Synchrony Bank (nearly 8%).

According to Moody's September 2021 Precis report, the Lebanon, PA MSA's economy is in recovery mode, with unemployment numbers approaching pre-pandemic levels. According to Moody's Analytics, leading industries in the assessment area include manufacturing (18%), education and health services (17%), and government (16%). The top employers are Sechler Family Foods, Lebanon VA Medical Center, Wellspan Good Samaritan Hospital, and Good Samaritan Health System.

An interview was conducted with a community development representative to provide perspective on the credit needs in the Lebanon, PA assessment area. This information is supplemented with demographic and economic data pertinent to the assessment area. According to the community contact, who represented an organization focused on economic development, the assessment area is in great need of workforce development, as it has experienced dramatic growth fueled by the addition of many distribution centers, which has rendered the current workforce inadequate to fuel the growth. Two other prominent credit needs identified by the contact were affordable housing, and small business credit. Finally, the contact indicated that reliable broadband connections throughout the county were needed, particularly in more rural areas.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

Tables showing the assessment area demographics of Lebanon, PA assessment area in 2018, 2019, and 2020 are contained on the following pages.

First Citizens Community Bank Lebanon, PA MSA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.4	922	1.9	343	37.2	8,402	16.9
Moderate-income	6	14.6	5,675	11.4	1,165	20.5	9,506	19.1
Middle-income	27	65.9	32,988	66.2	1,865	5.7	11,902	23.9
Upper-income	7	17.1	10,249	20.5	359	3.6	20,024	40.1
Unknown-income	0	0.0	0	0.0	0	0	0	0.0
Total Assessment Area	41	100.0	49,834	100.0	3,732	7.5	49,834	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,701	475	0.9	27.9	1,023	60.1	203	11.9
Moderate-income	10,882	4,442	8.5	40.8	5,575	51.2	865	7.9
Middle-income	48,819	35,705	68.7	73.1	9,632	19.7	3,482	7.1
Upper-income	14,947	11,365	21.9	76.0	2,857	19.1	725	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	76,349	51,987	100.0	68.1	19,087	25.0	5,275	6.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	61	0.8	57	0.9	3	0.5	1	0.7
Moderate-income	967	13.3	852	13.0	99	16.9	16	11.2
Middle-income	4,680	64.2	4,208	64.1	364	62.1	108	75.5
Upper-income	1,586	21.7	1,448	22.0	120	20.5	18	12.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,294	100.0	6,565	100.0	586	100.0	143	100.0
Percentage of Total Businesses:			90.0		8.0		2.0	
	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	3	0.8	3	0.8	0	0.0	0	0.0
Middle-income	314	79.1	305	78.8	8	88.9	1	100.0
Upper-income	80	20.1	79	20.4	1	11.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	397	100.0	387	100.0	9	100.0	1	100.0
Percentage of Total Farms:			97.5		2.3		0.3	

2015 ACS Data and 2018 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Lebanon, PA MSA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.4	922	1.9	343	37.2	8,402	16.9
Moderate-income	6	14.6	5,675	11.4	1,165	20.5	9,506	19.1
Middle-income	27	65.9	32,988	66.2	1,865	5.7	11,902	23.9
Upper-income	7	17.1	10,249	20.7	359	3.5	20,024	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	49,834	100.0	3,732	7.5	49,834	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,701	475	0.9	27.9	1,023	60.1	203	11.9
Moderate-income	10,882	4,442	8.5	40.8	5,575	51.2	865	7.9
Middle-income	48,819	35,705	68.7	73.1	9,632	19.7	3,482	7.1
Upper-income	14,947	11,365	21.9	76.0	2,857	19.1	725	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	76,349	51,987	100.0	68.1	19,087	25.0	5,275	6.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	63	0.9	59	0.9	3	0.5	1	0.7
Moderate-income	969	13.3	861	13.1	96	16.9	12	8.9
Middle-income	4,653	64.0	4,194	63.9	356	62.6	103	76.3
Upper-income	1,582	21.8	1,449	22.1	114	20.0	19	14.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,267	100.0	6,563	100.0	569	100.0	135	100.0
Percentage of Total Businesses:			90.3		7.8		1.9	
	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	2	0.5	2	0.5	0	0.0	0	0.0
Middle-income	313	78.3	305	78.0	7	87.5	1	100.0
Upper-income	85	21.2	84	21.5	1	12.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	400	100.0	391	100.0	8	100.0	1	100.0
Percentage of Total Farms:			97.8		2.0		0.3	

2015 ACS Data and 2019 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Lebanon, PA MSA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.4	922	1.9	343	37.2	8,402	16.9
Moderate-income	6	14.6	5,675	11.4	1,165	20.5	9,506	19.1
Middle-income	27	65.9	32,988	66.2	1,865	5.7	11,902	23.9
Upper-income	7	17.1	10,249	20.5	359	3.5	20,024	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	49,834	100.0	3,732	7.5	49,834	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,701	475	0.9	27.9	1,023	60.1	203	11.9
Moderate-income	10,882	4,442	8.5	40.8	5,575	51.2	865	7.9
Middle-income	48,819	35,705	68.7	73.1	9,632	19.7	3,482	7.1
Upper-income	14,947	11,365	21.9	76.0	2,857	19.1	725	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	76,349	51,987	100.0	68.1	19,087	25.0	5,275	6.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	67	0.9	63	1.0	3	0.5	1	0.7
Moderate-income	967	13.3	865	13.1	89	16.2	13	9.6
Middle-income	4,640	63.7	4,190	63.5	348	63.2	102	75.0
Upper-income	1,614	22.1	1,483	22.4	111	20.1	20	14.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,288	100.0	6,601	100.0	551	100.0	136	100.0
Percentage of Total Businesses:			90.6		7.6		1.9	
	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	2	0.5	2	0.5	0	0.0	0	0.0
Middle-income	320	78.6	311	78.3	8	88.9	1	100.0
Upper-income	85	20.9	84	21.2	1	11.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	407	100.0	397	100.0	9	100.0	1	100.0
Percentage of Total Farms:			97.5		2.2		0.2	

2015 ACS Data and 2020 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the Lebanon PA assessment area exceeds the institution's lending and investment performance, and is consistent with the institution's service performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

LENDING TEST

The bank's lending in the Lebanon, PA assessment area exceeds the bank's lending in the full-scope assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans in the Lebanon, PA assessment area, home-mortgage and small businesses loans were weighted equally in determining conclusions for the borrower and geographic distribution of lending. By number, the bank made slightly more small business loans, but by dollar amount, HMDA lending exceeded small business lending.

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

During 2018, First Citizens originated 66 HMDA loans aggregating approximately \$12.5 million. The bank's lending to low-income borrowers (3%) was below the level of aggregate lending to low-income borrowers (7%), and proxy of 17%. On the other hand, the bank's lending to moderate-income borrowers (26%) exceeded both aggregate lending to moderate income borrowers (21%), and proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made no loans in low-income tracts, though both aggregate lending and proxy were also quite low (both under 1%). In moderate-income tracts, the bank's lending (12%) exceeded both aggregate lending levels (10%) and proxy (9%).

During 2019, First Citizens originated 59 HMDA loans aggregating \$7.5 million. The bank's lending to low-income borrowers (15%) exceeded aggregate lending (7%), but trailed proxy (17%). The bank's lending to moderate-income borrowers (12%) was below both aggregate lending (21%) and proxy (19%). The bank's geographic distribution of HMDA in low-income tracts (2%) exceeded both aggregate lending and proxy (both 1%). In moderate-income tracts, the bank's lending (9%) was below aggregate lending levels (10%), but matched proxy (9%).

Finally, during 2020, First Citizens originated 93 HMDA loans aggregating almost \$17.3 million. The bank's lending to low-income borrowers (7%) matched aggregate lending (7%), but trailed proxy of low- (17%). Lending to moderate-income borrowers (14%) trailed both aggregate lending levels and proxy (both 19%). The bank's geographic distribution of HMDA loans in low-income tracts (3%) exceeded aggregate lending and proxy, both of which were just under 1%. On the other hand, First Citizens' HMDA lending in moderate-income tracts (3%) trailed aggregate and proxy (both 9%).

Small Business Lending

In 2018, First Citizens originated 47 small business loans aggregating just under \$10 million. Of these loans, just over 40% were originated to small businesses, which was below the aggregate lending level of 47% to small businesses by all lenders in the assessment area, and was less than half the proxy of 90%. From a geographic perspective, none of the bank's small business loans were originated in the assessment area's low-income tracts, though this performance was not much different than aggregate lending and proxy, both of which measured less than 1%. Lending in moderate-income tracts (15%) exceeded both aggregate lending (10%) and proxy (13%).

In 2019, First Citizens originated 38 small business loans aggregating \$6.3 million. Of these loans, 68% were originated to small businesses, which was above the aggregate lending level of 50%, but below the proxy of just over 90%. From a geographic perspective, none of the bank's small business loans were originated in the assessment area's low-income tracts, though again, aggregate and proxy were also below 1%. In moderate-income tracts, the bank's lending (12%) matched aggregate lending (12%), and was just below proxy (13%).

Finally, in 2020, First Citizens originated 148 small business loans aggregating \$12.4 million. Of these loans only 6% were originated to small businesses, which was below the aggregate lending level of almost 43% to small businesses by all lenders in the assessment area, and was below the proxy of nearly 91%.¹¹ From a geographic perspective, 1% of the bank's small business loans were originated in the assessment area's low-income tracts, matching both aggregate lending and proxy. The bank's small business lending in moderate-income tracts (12%) matched aggregate lending performance (12%), and both just trailed proxy (13%).

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed previously, First Citizens offers alternative mortgage products using a variety of different programs, and also offers small businesses loans through the SBA. Within the Lebanon, PA assessment area, First Citizens made two Freddie Mac Home Possible loans totaling just under \$146 thousand, one proprietary First-Time Homebuyer mortgage for almost \$73 thousand, one FHLB of Pittsburgh First Front Door grant in the amount of \$5 thousand, and 13 SBA loans totaling \$1.9 million.

Additionally, during the period evaluated, the bank made three community development loans totaling almost \$1.4 million. Of the total dollar amount, 88% supported affordable housing initiatives, and 12% supported revitalization/stabilization efforts. Of the bank's total community development lending by dollar amount, 16% was within the Lebanon, PA assessment area.

¹¹ Notably, in 2020, nearly 88% of small business loans in the assessment area were originated to businesses of unknown income (130 loans). This is attributable to the bank's participation in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provides small businesses with funds to pay up to eight weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. Under this program, institutions were not required to collect revenue information. For context, on the entire First Citizens' 2020 CRA LAR, 59% of the reported loans were PPP loans which were reported without revenue (584 loans).

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

The following table includes the bank’s community development lending in the limited-scope Lebanon, PA assessment area, by community development purpose.

First Citizens Community Bank Lebanon, PA Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2019	0	0	0	0	0	0	0	0	0	0
2020	1	250	0	0	0	0	0	0	1	250
2021	1	960	0	0	0	0	1	169	2	1,129
2022	0	0	0	0	0	0	0	0	0	0
TOTAL	2	1,210	0	0	0	0	1	169	3	1,379

INVESTMENT TEST

The bank’s investment performance in the Lebanon, PA assessment area exceeds the bank’s investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania, particularly in the Northern Tier, PA assessment area, which was given the highest weight in determining the statewide rating. Qualified investments and donations totaled just over \$1 million. Of the bank’s total investments, 16% were made within the Lebanon, PA assessment area.

First Citizens made three qualified investments totaling \$961 thousand in the Lebanon, PA assessment area. All three of the investments supported activities focused on affordable housing, a need noted by the community contact interviewed in conjunction with the evaluation.

In addition to the three qualified investments, First Citizens made 42 donations totaling almost \$86 thousand in the Lebanon, PA assessment area. The donations supported activities focused on affordable housing (less than 1%), community services targeting low- and moderate-income individuals (97%), and economic development (2%).

The following table presents investment and donation activity for the Lebanon, PA assessment area.

First Citizens Community Bank Lebanon, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	3	961	0	0	0	0	0	0	3	961
Donations	2	1	36	83	4	2	0	0	42	86
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	5	962	36	83	4	2	0	0	45	1,047

SERVICE TEST

The bank's service performance in the Lebanon, PA assessment area is consistent with the bank's service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

The bank operated six branches in the assessment area (20% of the bank's total branches). Of these, none were located in low- or moderate-income census tracts. Four branches were located in middle-income tracts (over 66%), and two were located in upper-income census tracts (33%). Retail services offered through the six branches in the assessment area were consistent with those offered in the full-scope assessment areas. All branches offered drive-through services, had standard hours, with extended hours offered at least one day a week, and offered limited Saturday hours. One branch in the Lebanon, PA assessment area was closed in early 2020, and this branch was located in a middle-income census tract¹².

In addition to retail services, a number of bank officers and employees conducted community development services by participating as board and committee members for affordable housing, economic development and community service agencies. Additionally, one employee serves as a financial literacy instructor for low- and moderate-income individuals, and another volunteers as a tax preparer through VITA, an IRS program that provides free income tax preparation for low- and moderate-income individuals. Finally, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative." Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB of Pittsburgh, on their behalf.

¹²On January 17, 2020, the bank closed its Lebanon Valley Mall branch, located at 2217 West Cumberland Street, Lebanon, PA 17042.

STATE COLLEGE, PA ASSESSMENT AREA / LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the State College, PA assessment area was conducted. For purposes of assessing First Citizens' performance in the Commonwealth of Pennsylvania, the State College, PA assessment area was assigned the third highest weight, behind the Northern Tier and Lebanon, PA assessment areas. During the evaluation period, lending activity in the State College, PA assessment area represented 7% of the bank's overall lending by number of loans and 15% by dollar amount. First Citizens operated one branch (3%) in the State College, PA assessment area, which held nearly \$62 million in deposits, or 4% of the bank's total deposits as of June 30, 2021.

It is noted that the State College, PA assessment area was added to First Citizens' assessment areas in 2018. This was the result of the acquisition of one branch office located in State College, PA from S&T Bank of Indiana, Pennsylvania on December 7, 2017. Due to the short duration of operations in this assessment area, performance in the State College, PA assessment area was not considered in the previous CRA performance evaluation. As such, this is the first CRA performance evaluation for this assessment area, and is the reason that a limited-scope review was conducted in this assessment area.

The bank's performance in the State College, PA assessment area is consistent with its performance in the full-scope review assessment areas. The facts and data reviewed, including performance and demographic information, including performance and demographic information, are presented in the tables located in the Appendices. Conclusions regarding performance are as follows:

ASSESSMENT AREA	LENDING TEST	INVESTMENT TEST	SERVICE TEST
State College, PA Assessment Area	Consistent	Below	Consistent

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's State College, PA assessment area consists of the entirety of Centre County, PA, which is coterminous with the State College, PA MSA.

According to 2015 ACS Data, the assessment area consisted of 31 census tracts, one of which was designated as low-income (3%), six of which were moderate-income (19%), 12 of which were middle-income (39%), eight of which were upper-income (26%), and four of which were unknown-income (13%). The assessment area's low-income census tract was located in the borough of State College. Two of the bank's six moderate-income tracts are located in the borough of State College, and the other four moderate-income tracts are located in Patton Township, Millheim, Rebersburg, and Bellefonte. The unknown-income tracts consisted of the Pennsylvania State University (Penn State) in the borough of State College, and the State Correctional Institution- Rockview in Brenner Township. According to 2015 ACS data, the assessment area had a population of 157,823.

A map of the State College PA assessment area using 2015 ACS data is available in Appendix F.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens' performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC's Deposit Market Share Report, as of June 30, 2021, there were 17 depository institutions operating in the State College, PA assessment area. These institutions maintained a total of 47 branches holding approximately \$4.6 billion in deposits. First Citizens ranked fourteenth, holding just over 1% of the deposit market share. PNC Bank, N.A. has a strong presence in the market, ranking first with 25% of the market, followed by First National Bank of Pennsylvania with 19% of the market, and Citizens Bank, N.A. with nearly 9%.

Similarly, First Citizens was a relatively minor player in the HMDA market holding around 1% of the market in 2018, 2019, 2020. In 2018, a total of 182 HMDA reporters originated or purchased a total of 3,586 HMDA loans. First Citizens ranked twenty-third in the HMDA market with less than 1% of the market. First National Bank of Pennsylvania led the market with 7% of HMDA loans, followed by Northwest Bank (7%) and Jersey Shore State Bank (6%).

In 2019, a total of 227 HMDA reporters originated or purchased a total of 4,054 HMDA loans. First Citizens ranked twenty-first in the HMDA market with 1% market share. Northwest Bank ranked first, with nearly 9% of HMDA loans, followed by Wells Fargo Bank, N.A. (nearly 7%) and Citizens Bank, N.A. (6%).

In 2020, a total of 250 HMDA reporters originated or purchased a total of 5,605 HMDA loans. First Citizens ranked seventeenth in the HMDA market, with 1% of the market. Northwest Bank once again ranked first in the market with 8% of loans, followed by Citizens Bank, N.A. (nearly 8%) and Wells Fargo Bank, N.A. (7%).

With regard to small business and small farm lending, in 2018, 61 reporters originated or purchased a total of 2,255 small business and small farm loans in the State College, PA assessment area. First Citizens ranked twentieth, with less than 1% of the market. American Express, NB led the market, with 16% of small business and small farm loans, followed by Chase Bank, USA N.A. (11%) and PNC Bank, N.A. (10%).

In 2019, 61 CRA reporters originated or purchased 2,295 loans. First Citizens ranked twenty-fifth, with less than 1% of the market. Again, American Express, NB ranked first, with 16% market share, followed by J.P. Morgan Chase Bank, N.A. (15%) and PNC Bank, N.A. (nearly 11%).

Finally, in 2020, a total of 74 reporters originated or purchased 2,731 CRA loans. First Citizens ranked twenty-first, with just over 1% of the market. First National Bank of Pennsylvania ranked first, with 14% market share, followed by Kish Bank (14%), and American Express NB (10%).

According to Moody's Analytics' September 2021 Precis report, the State College, PA MSA is in recovery mode, and is slowly beginning to recover after the education sector was significantly impaired due to COVID-19. According to Moody's, leading industries in the assessment area include government (42%), education and health services (13%), retail trade (9%), and professional and business services (8%). The top employers are Penn State University, Mount Nittany Health, Weis Markets Inc., and Geisinger Health.

One interview was conducted with a community development representative to provide perspective on the credit needs in the State College, PA assessment area. This information is supplemented with demographic and economic data pertinent to the assessment area. According to the community contact, who represented an organization focused on affordable housing, the assessment area is facing an increasing number of people experiencing homelessness, which is putting a strain on area shelters. In addition to increased homelessness, the community contact indicated that housing costs have increased notably, and that the cost to make needed repairs and rehabilitation to housing stock has also increased dramatically. Lastly, the contact identified a great need for community services to low- and moderate-income individuals in the assessment area.

Tables showing the assessment area demographics of State College, PA assessment area in 2018, 2019, and 2020 are contained on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank State College, PA MSA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	98	0.3	22	22.4	6,379	19.6
Moderate-income	6	19.4	6,623	20.4	794	12.0	6,029	18.5
Middle-income	12	38.7	15,612	48.0	935	6.0	7,001	21.5
Upper-income	8	25.8	9,740	29.9	279	2.9	13,123	40.4
Unknown-income	4	12.9	459	1.4	72	15.7	0	0.0
Total Assessment Area	31	100.0	32,532	100.0	2,102	6.5	32,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	148	0	0.0	0.0	119	80.4	29	19.6
Moderate-income	15,773	5,541	16.0	35.1	8,140	51.6	2,092	13.3
Middle-income	28,607	17,908	51.7	62.6	7,532	26.3	3,167	11.1
Upper-income	15,485	10,892	31.5	70.3	3,384	21.9	1,209	7.8
Unknown-income	4,476	265	0.8	5.9	3,402	76.0	809	18.1
Total Assessment Area	64,489	34,606	100.0	53.7	22,577	35.0	7,306	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8	0.1	8	0.1	0	0.0	0	0.0
Moderate-income	1,087	18.0	983	17.9	87	17.9	17	23.9
Middle-income	2,442	40.3	2,214	40.3	191	39.2	37	52.1
Upper-income	1,870	30.9	1,705	31.0	151	31.0	14	19.7
Unknown-income	646	10.7	585	10.7	58	11.9	3	4.3
Total Assessment Area	6,053	100.0	5,495	100.0	487	100.0	71	100.0
Percentage of Total Businesses:			90.8		8.0		1.2	
	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	30	13.6	29	13.4	1	25.0	0	0.0
Middle-income	135	61.4	133	61.6	2	50.0	0	0.0
Upper-income	53	24.1	52	24.1	1	25.0	0	0.0
Unknown-income	2	0.9	2	0.9	0	0.0	0	0.0
Total Assessment Area	220	100.0	216	100.0	4	100.0	0	0.0
Percentage of Total Farms:			98.2		1.8		0.0	

2015 ACS Data and 2018 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank State College, PA MSA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	98	0.3	22	22.4	6,379	19.6
Moderate-income	6	19.4	6,623	20.4	794	12.0	6,029	18.5
Middle-income	12	38.7	15,612	48.0	935	6.0	7,001	21.5
Upper-income	8	25.8	9,740	29.9	279	2.9	13,123	40.4
Unknown-income	4	12.9	459	1.4	72	15.7	0	0.0
Total Assessment Area	31	100.0	32,532	100.0	2,102	6.5	32,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	148	0	0.0	0.0	119	80.4	29	19.6
Moderate-income	15,773	5,541	16.0	35.1	8,140	51.6	2,092	13.3
Middle-income	28,607	17,908	51.7	62.6	7,532	26.3	3,167	11.1
Upper-income	15,485	10,892	31.5	70.3	3,384	21.9	1,209	7.8
Unknown-income	4,476	265	0.8	5.9	3,402	76.0	809	18.1
Total Assessment Area	64,489	34,606	100.0	53.7	22,577	35.0	7,306	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8	0.1	8	0.1	0	0.0	0	0.0
Moderate-income	1,125	18.4	1,027	18.4	84	17.7	14	20.9
Middle-income	2,462	40.3	2,242	40.2	184	38.7	36	53.7
Upper-income	1,868	30.5	1,703	30.6	149	31.4	16	23.9
Unknown-income	652	10.7	593	10.7	58	12.2	1	1.5
Total Assessment Area	6,115	100.0	5,573	100.0	475	100.0	67	100.0
Percentage of Total Businesses:				91.1		7.8		1.1
	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	30	13.6	29	13.4	1	25.0	0	0.0
Middle-income	137	62.0	135	62.2	2	50.0	0	0.0
Upper-income	52	23.5	51	23.5	1	25.0	0	0.0
Unknown-income	2	0.9	2	0.9	0	0.0	0	0.0
Total Assessment Area	221	100.0	217	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.2		1.8		0.0

2015 ACS Data and 2019 D&B Information

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank State College, PA MSA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2	98	0.3	22	22.4	6,379	19.6
Moderate-income	6	19.4	6,623	20.4	794	12.0	6,029	18.5
Middle-income	12	38.7	15,612	48.0	935	6.0	7,001	21.5
Upper-income	8	25.8	9,740	29.9	279	2.9	13,123	40.4
Unknown-income	4	12.9	459	1.4	72	15.7	0	0.0
Total Assessment Area	31	100.0	32,532	100.0	2,102	6.5	32,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	148	0	0.0	0.0	119	80.4	29	19.6
Moderate-income	15,773	5,541	16.0	35.1	8,140	51.6	2,092	13.3
Middle-income	28,607	17,908	51.7	62.6	7,532	26.3	3,167	11.1
Upper-income	15,485	10,892	31.5	70.3	3,384	21.9	1,209	7.8
Unknown-income	4,476	265	0.8	5.9	3,402	76.0	809	18.1
Total Assessment Area	64,489	34,606	100.0	53.7	22,577	35.0	7,306	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7	0.1	7	0.1	0	0.0	0	0.0
Moderate-income	1,133	18.6	1,037	18.6	83	18.0	13	18.8
Middle-income	2,448	40.2	2,233	40.1	178	38.5	37	53.6
Upper-income	1,873	30.7	1,714	30.8	143	31.0	16	23.2
Unknown-income	632	10.4	571	10.4	58	12.5	3	4.4
Total Assessment Area	6,093	100.0	5,562	100.0	462	100.0	69	100.0
Percentage of Total Businesses:				91.3		7.6		1.1
	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	27	12.2	26	12.0	1	25.0	0	0.0
Middle-income	139	62.9	137	63.1	2	50.0	0	0.0
Upper-income	52	23.5	51	23.5	1	25.0	0	0.0
Unknown-income	3	1.4	3	1.4	0	0.0	0	0.0
Total Assessment Area	221	100.0	217	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.2		1.8		0.0

2015 ACS Data and 2020 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the State College, PA assessment area is consistent with the institution's lending, is below the institution's investment, and is consistent with the institution's service performance overall in the Commonwealth of Pennsylvania.

LENDING TEST

The bank's lending in the State College, PA assessment area is consistent with the bank's lending in the full-scope assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans in the State College, PA assessment area, home mortgage loans were weighted more than small business loans in determining conclusions for borrower and geographic distribution of lending.

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

During 2018, First Citizens originated 28 HMDA loans aggregating nearly \$10.6 million. The bank's lending to low-income borrowers (nearly 4%) trailed both aggregate lending (8%) and proxy (20%). Lending to moderate-income borrowers was higher than lending to low-income borrowers (11%), but was still below both aggregate lending and proxy (both 19%). Geographic distribution of HMDA loans was evaluated only in moderate-income tracts, as no owner-occupied housing units were located in the assessment area's low-income tracts. The bank made 25% of HMDA loans in moderate-income geographies in 2018, exceeding both aggregate lending levels of 17% in moderate-income geographies, and the proxy of owner-occupied units in moderate-income tracts, of 16%.

During 2019, First Citizens originated 40 HMDA loans aggregating nearly \$19 million. The bank's lending to low-income borrowers (10%) was just below aggregate lending (11%), and was below proxy (20%). Lending to moderate-income borrowers (almost 8%) was below aggregate lending and proxy (both 19%). Again, Geographic distribution performance was based on lending in moderate-income tracts, due to assessment area demographics. First Citizens made 15% of HMDA loans in moderate-income geographies in 2019, which was just below aggregate lending (17%) and proxy (16%).

Finally, during 2020, First Citizens originated 73 HMDA loans aggregating over \$21 million. The bank's lending to low-income borrowers was below the aggregate lending level (7%) and proxy (20%). Similarly, lending moderate-income borrowers (11%), trailed both aggregate lending to moderate-income borrowers (16%) and proxy (19%). From a geographic distribution perspective, the bank made 10% of HMDA loans in moderate-income geographies in 2020, which was below aggregate lending levels 15%, and proxy of 16%.

Small Business Lending

In 2018, First Citizens originated 5 small business loans aggregating \$500 thousand. Of these loans 80% were originated to small businesses, which was above the aggregate lending level of 46% to small businesses by all lenders in the assessment area, and was below the proxy of 91%. From a geographic perspective, performance is based on lending in moderate-income tracts only, since less than 1% of businesses were located in low-income tracts. In 2018, 20% of the bank's small business loans were made in moderate-income tracts, just exceeding both aggregate lending performance (19%), and proxy (18%).

In 2019, First Citizens originated 3 small business loans aggregating \$573 thousand. Of these loans 67% were originated to small businesses, which was above the aggregate lending level of 46% to small businesses by all lenders in the assessment area, but below the proxy of 91%. From a geographic perspective, none of the bank's small business loans were originated in the assessment area's moderate-income tracts, while aggregate lending performance and proxy measured 18%.

Finally, in 2020, First Citizens originated 28 small business loans aggregating \$3.8 million. Of these loans, none were originated to small businesses, which was below the aggregate lending level of nearly 42%, and the proxy of just over 91%. Once again, due to assessment area demographics, geographic distribution performance was based on lending in moderate-income census tracts. The bank originated 11% of small business loans in moderate-income tracts, performing below the aggregate lending level (17%), and proxy (19%).

Innovative and/or Flexible Lending Practices and Community Development Lending

As indicated previously, First Citizens offers alternative mortgage products using a variety of different programs to reach low- and moderate-income borrowers, and offers small business loans through the SBA, tailored to the needs of small businesses. Within the State College, PA assessment area, First Citizens made one FHA loan totaling \$209 thousand, one Freddie Mac Home Possible loan totaling \$155 thousand, three proprietary First-Time Homebuyer loans totaling \$775 thousand, and three SBA loans totaling \$185 thousand.

The bank made no community development loans in the State College, PA assessment area during the evaluation period.

It is noted that the State College, PA assessment area was added to First Citizens' assessment areas in 2018, as the result of the acquisition of one branch office located in State College, PA from S&T Bank of Indiana, Pennsylvania on December 7, 2017. Due to the short duration of operations in this assessment area, performance in the State College, PA assessment area was not considered in the previous CRA performance evaluation. As such, this is the first CRA performance evaluation for this assessment area, which was taken into consideration in evaluating innovative and flexible lending and community development lending performance in this assessment area.

INVESTMENT TEST

The bank’s investment test performance in the State College, PA assessment area is below the bank’s investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Again, the bank’s relatively short amount of time in this assessment area was taken into consideration when determining this conclusion.

First Citizens made no qualified investments in the State College, PA assessment area. However, the bank made eight donations totaling \$8 thousand in the State College, PA assessment area. The bank’s total qualified investments and donations in the State College, PA assessment are represented less than 1% of the bank’s overall investments.

The bank’s donations supported activities focused on affordable housing (38%, or one donation totaling \$3 thousand); and community services targeting low- and moderate-income individuals (62%, or seven donations totaling just under \$5 thousand). Both of these community development purposes were needs noted by community contacts.

The following table presents investment and donation activity in the State College, PA assessment area.

First Citizens Community Bank State College, PA Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	0	0	0	0	0	0	0	0	0	0
Donations	1	3	7	5	0	0	0	0	8	8
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	1	3	7	5	0	0	0	0	8	8

SERVICE TEST

The bank’s service performance in the State College, PA assessment area is consistent with the bank’s service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

The bank operated one branch in the assessment area during the evaluation period (3% of total branches). This branch was located in an unknown-income census tract on the campus of Penn State. Retail services offered through the branch were generally consistent with those offered in the full-scope assessment areas in the Commonwealth. Though no drive-through facility is on-site, the branch does offer an ATM, and has standard banking hours, Monday through Friday.

In addition to retail services, the bank conducted community development services, with a bank employee participating as a board member for Centre County Housing and Land Trust (a nonprofit focused on affordable housing development and financial literacy), the State College Downtown Improvement District (a neighborhood improvement district established by the Borough of State College), and the State of Hope Foundation (a nonprofit focused on providing community services to youth from low-income families and single parents). Finally, the bank participates as an intermediary for the FHLB of Pittsburgh’s “Home4Good Initiative.” Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB of Pittsburgh, on their behalf.

**CHESTER, PA / NEW CASTLE, DE MULTISTATE
ASSESSMENT AREA
FULL-SCOPE REVIEW**

CRA RATING

Performance Test	Performance Level
Lending	Low Satisfactory
Investment	High Satisfactory
Service	High Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- Lending levels reflect adequate responsiveness to assessment area credit needs;
- The borrower distribution reflects, given the product lines offered, poor penetration among retail customers of different income levels, and adequate penetration among business customers of different sizes;
- The geographic distribution of loans reflects good penetration throughout the assessment area, good penetration from a retail perspective, and good penetration among business lending;
- The bank makes limited use of innovative and/or flexible lending practices;
- The bank makes an adequate level of community development loans in the assessment area;
- The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position; and
- The bank provides a relatively high level of community development services in its Chester County, PA / New Castle, DE assessment area.

SCOPE OF EXAMINATION

For purposes of this CRA evaluation, the rating in the multistate assessment area is based solely on the bank's performance in this Chester, PA / New Castle, DE assessment area, which was reviewed using full-scope review procedures. This multistate assessment area was added to the bank's assessment areas in 2020, when First Citizens acquired MidCoast Community Bank. Through the acquisition, in April 2020, the bank acquired two branches in the assessment area, one located in Wilmington, DE. In November 2020, the bank opened its third branch in the assessment area, located in Kennett Square, PA. Consequently, First Citizens' performance in the multistate assessment area was evaluated from the period from April 17, 2020 through March 28, 2022.

The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development loans. Due to loan volumes, HMDA and small business loans were given equal weight in drawing performance conclusions for borrower and geographic distribution. In 2020, the bank originated a total of 33 HMDA loans totaling \$10.5 million. Though the number of small business loans (46) was greater, the dollar amount (\$10.6 million) was comparable to HMDA loans.

For purposes of assessing First Citizens' overall CRA performance, significantly less weight was given to performance in this multistate assessment area, as the overwhelming majority of the bank's operations were located in the four Pennsylvania assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

The Chester, PA / New Castle, DE multistate assessment area consists of the entirety of Chester County in Pennsylvania, and the entirety of New Castle County in Delaware. Chester County, PA is a portion of the Montgomery-Bucks-Chester, PA MD, and New Castle County, DE is a portion of the Wilmington, DE-MD-NJ MD. Both counties are a part of the larger Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA. Both Chester County, PA and New Castle County, DE are situated south of the city of Philadelphia, and are located in the Delaware Valley region.

Behind the assessment areas in the Commonwealth of Pennsylvania, the second most significant portion of the bank's operations, loan and deposit activity takes place within this multistate assessment area. As a result, the Chester, PA / New Castle, DE assessment area is given the second greatest weight in determining the overall CRA rating for the institution. Of the bank's total loans, 4% by number, and just under 7% by dollar volume were made within the Chester, PA / New Castle, DE assessment area. As mentioned previously, First Citizens operated three branches (10%) in the assessment area, which held almost \$186 million in deposits, or 11% of the bank's total deposits as of June 30, 2021.

First Citizens' CRA performance in the Chester, PA / New Castle, DE assessment area was evaluated in terms of the demographic and economic context in which the bank operates.

According to 2015 ACS data, the assessment area was comprised of 247 census tracts. Of these 247 tracts, 13 tracts (5%) were designated as low-income, 62 tracts (25%) were moderate-income, 96 tracts (39%) were middle-income, and 73 tracts (nearly 30%) were upper-income. Additionally, three tracts (1%) were unknown-income census tracts. The majority of the LMI tracts in the assessment area are in and around Wilmington, DE; Coatesville, PA; and Oxford, PA. The unknown-income tracts consist of Cherry Island Landfill, the Delaware River, and West Chester University.

Maps of the Chester, PA / New Castle, DE assessment area, at the 2015 ACS, are available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, there were 49 depository institutions operating in the Chester, PA / New Castle, DE assessment area. These institutions maintained a total of 311 branches holding over \$411 billion in deposits. First Citizens, with three branches in the assessment area, ranked twenty-ninth, with \$186 million, or less than 1% of the deposit market. Capital One, N.A. held the largest share of deposits with 42% of the market, followed by TD Bank, N.A., with nearly 34% of the market, and TD Bank USA, N.A. with nearly 6% of the market.

First Citizens reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2020, the bank's first year of operation in this assessment area, a total of 615 institutions reported 65,542 HMDA loan originations and purchases within the assessment area. First Citizens ranked one hundred and thirty-third, with less than 1% of the market. Data shows that Wells Fargo Bank, N.A. ranked first among these institutions with 7% of all HMDA loan originations and purchases. Quicken Loans, LLC ranked second with 6% of HMDA originations and purchases, followed by Pike Creek Mortgage Services with almost 4% of the market.

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually, and is presented below for the one year that First Citizens operated in the market. In 2020, a total of 227 institutions reported 32,590 CRA small business loan originations within the assessment area. First Citizens ranked thirty-seventh, with less than 1% of the CRA market. American Express, NB led the small business market, with almost 16% market share, followed by Wilmington Savings Fund Society, FSB (7%), and Wells Fargo Bank, N.A. (7%).

Since CRA small business loan reporting includes small business loans issued by reporters under corporate credit card arrangements, the reporters with the highest rankings included national and regional originators. In fact, the top ten market leaders in 2020 were national and regional originators with large credit card portfolios, and controlled nearly 64% of the market.

To supplement economic, demographic and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit needs in the Chester, PA / New Castle, DE assessment area. Both interviews were held with representatives from affordable housing organizations. Contacts identified the greatest needs in the assessment area as small dollar business lending and affordable housing (both purchase and rental). Additionally, contacts indicated that individuals with thin or damaged credit histories would benefit from programs to help build credit, which would eventually allow them to qualify for mortgage products.

Economic Characteristics

As indicated previously, the Chester, PA / New Castle, DE assessment area consists of Chester County in Pennsylvania, and New Castle County in Delaware. Chester County, PA is located west of the city of Philadelphia, and New Castle County, DE is situated southwest of Philadelphia. The assessment area had a population of over one million people as of the 2015 ACS update, making it the most densely populated of the bank's assessment areas.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

Moody’s Analytics provides economic data at the MD level, and therefore information is presented below for the Montgomery-Bucks-Chester, PA MD, and separate information is provided for the Wilmington, DE-MD-NJ MD. According to the Moody’s Analytics Precis report as of September 2021, the Montgomery-Chester-Bucks, PA MD is in recovery mode, driven largely by the information, financial and other white-collar industries. Strengths of the MD include its proximity to Philadelphia, a well-educated labor force, strong migration trends, as well as high per capita income and a very low poverty rate. However, area weaknesses include aging infrastructure and reliance on highly cyclical industries, such as retail trade.

According to Moody’s, top industries in the MD include professional and business services (19% of all employment), education and health services (19%), and retail trade (10%). Leading employers include Tower Health, The Vanguard Group, Einstein Healthcare Network, Universal Health Services, Inc., and Holy Redeemer Health System.

According to Moody’s, the Wilmington, DE-PA-NJ MD is also in recovery mode, with the leisure and hospitality industry leading the way. According to the report, the housing market is strong, with construction booming and prices rising. Additionally, the recovery of consumer spending has been a boon to the financial sector, given that Wilmington houses many large credit card providers. Strengths of the MD include many financial service jobs, a strong business climate, and low business costs for the Northeast, providing the opportunity to draw from the labor pools of Pennsylvania, New Jersey, and Maryland. However, area weaknesses include industrial diversity that is lower than that of other large metro areas in the region, and aging infrastructure that reduces the appeal of the area.

According to Moody’s, top industries in the MD include education and health services (18%), professional and business services (15%), government (14%), and financial services (13%). Leading employers include Christiana Care Health System, JPMorgan Chase & Co., Bank of America Corp., AstraZeneca, and the University of Delaware.

While the bank only operated in the assessment area during 2020, for contextual purposes, area unemployment rates for years 2018, 2019 and 2020, as reported by the Bureau of Labor Statistics, are reflected in the following table. New Castle County, DE had the higher unemployment rate of the two counties in the assessment area, but was still below the unemployment rates in the State of Delaware and the nation as a whole. Chester County, PA ended the period with the lower unemployment rate of the two counties in the assessment area, and remained significantly below rates for both the Commonwealth of Pennsylvania and the nation as a whole.

First Citizens Community Bank			
Chester, PA / New Castle, DE Assessment Area			
Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	% 2018 Annual	% 2019 Annual	% 2020 Annual
Chester County, PA	3.3	3.2	6.4
New Castle County, DE	3.6	3.5	7.7
Commonwealth of Pennsylvania	4.5	4.5	9.1
State of Delaware	3.8	3.7	7.8
United States	3.9	3.7	8.1

Unemployment data is from the Bureau of Labor Statistics.

HOUSING

According to 2015 ACS data, the assessment area contained 414,313 housing units, nearly 68% of which were owner-occupied, just over 26% of which were rentals, and just over 6% of which were vacant. The overall owner-occupancy rate in the assessment area (68%) was higher than the rates in the Commonwealth of Pennsylvania (61%) and in Delaware (59)%.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to 2015 ACS data, of the 279,482 owner-occupied housing units in the Chester, PA / New Castle, DE assessment area, 2% were located in low-income census tracts, 18% were in moderate-income tracts, 42% were in middle-income tracts, and 38% were in upper-income tracts.

Of the total existing housing units, 77% were single family units, 5% were two-to-four family units, 15% were multifamily units, and nearly 3% were mobile homes. The median age of housing in the assessment area was 46 years, making it older than the housing stock in the State of Delaware (33 years), but newer than the housing stock in the Commonwealth of Pennsylvania (54 years). This indicates a potential need for home improvement loans for rehabilitation of the assessment area's housing stock.

Data show that the price of housing in the assessment area was higher than in the Commonwealth of Pennsylvania and in the State of Delaware. The 2015 ACS data indicates that the median housing value was \$278,956 in the Chester, PA / New Castle, DE assessment area. Median housing values reported in the Commonwealth of Pennsylvania, and State of Delaware were \$166,000, and \$231,500, respectively. Further, data show a disparity in housing values in low- and moderate-income tracts compared to those in middle- and upper-income tracts. The median housing value was \$139,894 in low-income tracts, and \$188,602 in moderate-income tracts. Values in middle- and upper-income tracts were significantly higher. More specifically, median housing values measured \$260,138 in middle-income tracts, and \$379,754 in upper-income tracts.

Finally, median gross rent (rent plus utilities) in the assessment area was \$1,101 per month, with just over 46% of renters paying more than 30% of their income for housing. Median rent in Pennsylvania was significantly lower at \$840, with nearly 46% of renters paying more than 30% of income for housing statewide. In Delaware, median rent was closer to the assessment areas measure, at \$1,018, with nearly 46% of renters paying more than 30% of income for housing. It is noted that higher rents can be a burden, especially to low- and moderate-income renters, effectively diminishing their ability to save money for a down payment.

Borrower Income Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS data shows that there were 263,658 families in the assessment area. Of the total families in the assessment area, nearly 20% were designated as low-income, nearly 18% were moderate-income, 21% were middle-income, and 42% were upper-income. In the assessment area, 6% of families were living below the poverty level, compared with a rate of just over 9% for the Commonwealth of Pennsylvania, and 8% for the State of Delaware.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon HUD annually-adjusted median family income data made available by the FFIEC. The assessment area’s median family incomes for 2020 are listed in the following table, categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Metropolitan Division	Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
Montgomery-Bucks-Chester, PA MD	2020	\$118,000	\$59,000	\$59,000 - \$94,399	\$94,400 - \$141,599	\$141,600 or more
New Castle, DE MD	2020	\$90,800	\$45,400	\$45,400 - \$72,639	\$72,640 - \$108,959	\$108,960 or more

Geographic Business Data

The percentage of businesses located within designated tracts is used as a proxy to estimate demand for business credit within such tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data in 2020, the bank’s first year in this assessment area, there were 60,253 businesses in the assessment area. Of these businesses, nearly 3% were located in low-income census tracts, and nearly 21% were in moderate-income census tracts. The majority of businesses were located in middle-income census tracts (42%), and upper-income census tracts (34%). Business demographic data also revealed that of the 60,253 businesses located in the assessment area in 2020, nearly 91% were small businesses with gross annual revenues of \$1 million or less.

The 2020 assessment area demographics used to evaluate First Citizens’ CRA performance in the Chester, PA / New Castle, DE assessment area are detailed in the table below.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Chester, PA / New Castle, DE Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	5.3	9,714	3.7	2,832	29.2	52,235	19.8
Moderate-income	62	25.1	51,743	19.6	5,904	11.4	46,057	17.5
Middle-income	96	38.9	109,019	41.3	4,915	4.5	55,384	21.0
Upper-income	73	29.6	93,182	35.4	1,877	2.0	109,982	41.7
Unknown-income	3	1.1	0	0.0	0	0.0	0	0.0
Total Assessment Area	247	100.0	263,658	100.0	15,528	5.9	263,658	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	19,042	5,639	2.0	29.6	10,577	55.5	2,826	14.8
Moderate-income	92,695	50,628	18.1	54.6	33,841	36.5	8,226	8.9
Middle-income	172,620	117,655	42.1	68.2	45,406	26.3	9,559	5.5
Upper-income	129,956	105,560	37.8	81.2	19,019	14.6	5,377	4.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	414,313	279,482	100.0	67.5	108,843	26.3	25,988	6.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,582	2.6	1,447	2.7	120	2.3	15	2.8
Moderate-income	12,367	20.5	11,000	20.2	1,228	23.8	139	25.6
Middle-income	25,549	42.4	23,086	42.3	2,238	43.4	225	41.4
Upper-income	20,743	34.4	19,014	34.8	1,564	30.4	165	30.2
Unknown-income	12	0.0	9	0.0	3	0.1	0	0.0
Total Assessment Area	60,253	100.0	54,556	100.0	5,153	100.0	544	100.0
Percentage of Total Businesses:			90.5		8.6		0.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	0.7	5	0.7	0	0.0	0	0.0
Moderate-income	133	17.6	125	18.1	8	12.3	0	0.0
Middle-income	372	49.3	329	47.8	43	66.2	0	0.0
Upper-income	244	32.4	230	33.4	14	21.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	754	100.0	689	100.0	65	100.0	0	0.0
Percentage of Total Farms:			91.4		8.6		0.0	

2015 ACS Data and 2020 D&B Information

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

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

Performance under the lending test is rated low satisfactory in Chester, PA / New Castle, DE assessment area.

Lending Activity

First Citizens' lending levels in the Chester, PA / New Castle, DE assessment area reflect adequate responsiveness to the assessment area's credit needs. This conclusion takes into consideration that the bank just recently entered into the assessment area in 2020, after obtaining two branches through its acquisition of MidCoast Community Bank. During the evaluation period, lending activity in the Chester, PA / New Castle, DE assessment area represented 4% of the bank's overall lending by number of loans, and 7% by dollar volume. First Citizens made 48 HMDA loans totaling nearly \$13.8 million, and 51 small business loans totaling \$11.3 million in the Chester, PA / New Castle, DE assessment area.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance. Further, as mentioned previously, due to loan volumes, HMDA and small business loans are given equal weight in determining the bank's borrower distribution of loans. Finally, given that the bank entered the assessment area in 2020, results are based solely on lending during that single year.

Home-Mortgage Lending

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

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families within the assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, approximately 20% of families in the assessment area were designated as low-income, almost 18% were moderate-income, 21% were middle-income, and 42% were upper-income. According to 2015 ACS data, approximately 38% of families were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

The following table compares First Citizens’ home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table, used to evaluate lending in 2020, relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data, following the requirements of Regulation C.

First Citizens Community Bank Chester, PA / New Castle, DE Assessment Area Distribution of HMDA Loans by Borrower Income Level				
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison		
		2020		
		% First Citizens Lending	% Aggregate Lending	
Low	19.8	0.0	7.3	
Moderate	17.5	6.1	17.9	
Middle	21.0	21.2	22.9	
Upper	41.7	39.4	36.5	
Unknown	0.0	33.3	15.4	
Total	100.0	100.0	100.0	

Lending to Low-Income Borrowers

In assessing the level of the bank’s lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities. Additionally, it is noted that 2020 was the bank’s first year in the assessment area.

First Citizens’ lending in 2020 to low-income borrowers was poor. None of the bank’s 33 HMDA loans were originated to low-income borrowers. This performance fell below the aggregate lending level of 7%, and below proxy of 20%. Aggregate lenders made 11% of home purchase loans, 5% of refinance loans, 7% of home improvement loans, no multifamily loans, and less than 1% of loans with purpose “not applicable” to low-income borrowers in 2020.

Lending to Moderate-Income Borrowers

First Citizens' lending in 2020 to moderate-income borrowers was poor. Of the bank's 33 HMDA loans in 2020, 6% of the bank's HMDA loans (two loans) were originated to moderate-income borrowers. Again, this performance was below the aggregate lending level of 18%, and the proxy of 18%. By loan category, both of the bank's loans originated to moderate-income borrowers were refinance loans (12%). In comparison, aggregate lenders made 24% of home purchase loans, 16% of refinance loans, 17% of home improvement loans, no multifamily loans, and less than 1% of loans with purpose "not applicable" to moderate-income borrowers in 2020.

Small Business Lending

An analysis of First Citizens' borrower distribution of small business loans reflects adequate 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 analyzed to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the Chester, PA / New Castle, DE assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to available Dun & Bradstreet business demographic data, in 2020 there were 60,253 businesses operating in the assessment area, with 54,556 (nearly 91%) designated as small businesses.

In 2020, the bank's borrower distribution of small business loans was adequate. In 2020, First Citizens originated 46 small business loans within the assessment area, aggregating almost \$10.7 million. Of these loans, 22% were originated to small businesses (10 loans). This performance was below the aggregate lending level of 39% to small businesses, and below the proxy of 91%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus, added weight is given to such loans in determining whether an institution is meeting the credit needs of smaller businesses. In 2020, 44% of First Citizens' small business loans were extended in amounts of \$100 thousand or less (20 loans). Aggregate data indicates that nearly 86% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the Chester, PA / New Castle, DE assessment area, including low- and moderate-income tracts.

Once again, it is noted that HMDA and small business loans were weighted equally in determining this conclusion, given their comparable volumes. Again, given that the bank entered this assessment area in 2020, the geographic distribution performance is based solely on loans originated during that single year.

Home-Mortgage Lending

First Citizens’ distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending 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 2015 ACS data, 2% of the assessment area’s owner-occupied housing stock was located in low-income census tracts, and 18% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (42% and 38%, respectively).

The following table presents First Citizens’ geographic distribution of HMDA loans for 2020, in comparison to the applicable owner-occupied housing proxy and the aggregate lending levels in the assessment area. The table relies on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

First Citizens Community Bank Chester, PA / New Castle, DE Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2020	
		% First Citizens Lending	% Aggregate Lending
Low	2.0	3.0	1.5
Moderate	18.1	24.2	14.6
Middle	42.1	36.4	39.9
Upper	37.8	36.4	44.0
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

First Citizens’ HMDA lending in low-income census tracts in 2020 was adequate. Of the 33 HMDA loans originated by First Citizens in 2020, 3% were made in low-income tracts in 2020 (one loan). This performance was above the aggregate lending level of nearly 2%, and proxy of 2%. Categorized by loan product type, First Citizens’ single loan in a low-income tract was a refinance loan (6%). Aggregate lenders made 2% of home purchase loans, 1% of refinance loans, 1% of home improvement loans, 15% of multifamily loans, and nearly 4% of loans with purpose “not applicable” in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

First Citizens’ lending in moderate-income census tracts in 2020 was excellent. Of the 33 loans made by the bank in 2020, 24% (eight loans) were made in moderate-income tracts. This level measured well above the aggregate lending performance of nearly 15% and proxy of 18%. Categorized by loan product type, First Citizens made 25% of its home purchase loans (three loans), 12% of its refinance loans (two loans), 100% of its home improvement loans (two loans), 50% of its multifamily loans (one loan), and no loans with purpose “not applicable” in moderate-income tracts in 2020. By comparison, aggregate lenders made 19% of home purchase loans, 12% of refinance loans, 10% of home improvement loans, 32% of multifamily loans, and 31% of loans with purpose “not applicable” in moderate-income tracts in the assessment area in 2020.

Small Business Lending

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

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. Based on 2020 Dun & Bradstreet data, in 2020, 60,253 businesses operated in the assessment area. Of these, 3% were located in low-income tracts, and 21% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (42% and 34%, respectively).

The table below presents First Citizens’ small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for 2020.

First Citizens Community Bank Chester, PA / New Castle, DE Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2020	
		% First Citizens Lending	% Aggregate Lending
Low	2.6	0.0	2.1
Moderate	20.5	34.8	20.2
Middle	42.5	37.0	41.6
Upper	34.4	28.2	35.7
Unknown	0.0	0.0	0.4
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was poor. None of First Citizens' 46 small business loans were originated in low-income census tracts. The bank's lending level was below the 2020 aggregate small business lending level of 2%, and the proxy of businesses located in low-income tracts (3%).

Lending in Moderate-Income Census Tracts

In 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was excellent. Of the bank's 46 small business loans, First Citizens originated 35% of its small business loans (16 loans) in the assessment area's moderate-income census tracts. The bank's lending level was well above the 2020 aggregate small business lending level of 20%, and the proxy of businesses located in moderate-income census tracts, of 21%.

Responsiveness to Credit Needs

First Citizens exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices. The bank achieved this record through its retail HMDA and small business lending, and the use of innovative and flexible lending products and community development loans, which are discussed below.

As indicated previously, community contacts identified small dollar business lending as a primary credit need, and the bank's use of SBA loans helped to meet this need.

Innovative and/or Flexible Lending Practices

First Citizens makes limited use of innovative and/or flexible lending practices in serving the Chester, PA / New Castle, DE assessment area credit needs. As discussed previously, the bank offers alternative mortgage products through a number of different programs within its assessment areas. However, during the evaluation period, First Citizens made no loans through these programs in this assessment area.

To address the credit needs of small businesses in its assessment area, First Citizens participates in the SBA loan program, and is a preferred SBA Express Lender. During the short timeframe in which the bank operated in the assessment area, First Citizens made five SBA loans totaling nearly \$772 thousand.

Community Development Lending

First Citizens makes an adequate level of community development loans in the assessment area, given its short time in the assessment area. During the period evaluated, which included the timeframe beginning when the bank entered the assessment area on April 17, 2020, through March 28, 2022, the bank made one community development loan in the assessment area, totaling \$454 thousand. Of the bank's total dollar amount of community development lending made in all assessment areas, 5% was made in the Chester, PA / New Castle, DE assessment area.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

The one community development loan in the assessment area provided community services to low- and moderate-income individuals.

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

First Citizens Community Bank Chester, PA / New Castle, DE Assessment Area Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	1	454	0	0	0	0	1	454
2022	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	1	454	0	0	0	0	1	454

INVESTMENT TEST

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

Performance under the investment test is assessed as high satisfactory.

Volume of Investment and Grant Activity

First Citizens has a significant level of qualified community development investments and grants, occasionally in a leadership position. Qualified investments, grants, and donations for the Chester, PA / New Castle, DE assessment area totaled \$2.4 million. It is noteworthy that the bank began its operations in this assessment area in 2020. Of the bank’s overall investments, 37% were within the Chester, PA / New Castle, DE assessment area.

The bank’s three qualified investments in the assessment area totaled \$2.3 million, and all supported affordable housing initiatives for low- and moderate-income individuals through a low-income housing tax credit project (LIHTC) with a community development financial institution (CDFI) that aided in the construction of six low- and mixed-income housing projects located in the Chester, PA / New Castle, DE assessment area and the Dover, DE assessment area. Credit has been allocated based upon proportions of the projects located in each assessment area.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

The bank also made a total of 19 donations totaling over \$44 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, 13% (three donations totaling \$6 thousand) supported affordable housing, 63% (13 donations totaling \$28 thousand) were to organizations that provide community services to low- and moderate-income individuals, 23% (two donations totaling \$10 thousand) supported economic development, and 1% (one donation totaling \$5 hundred) supported revitalization and stabilization efforts in the assessment area.

The following table presents the investment and donation activity for the Chester, PA / New Castle, DE assessment area.

First Citizens Community Bank Chester, PA / New Castle, DE Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	3	2,344	0	0	0	0	0	0	3	2,344
Donations	3	6	13	28	2	10	1	1	19	45
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	6	2,350	13	28	2	10	1	1	22	2,389

Responsiveness to Credit and Community Development Needs

First Citizens exhibits good responsiveness to credit and community development needs of the assessment area. Community contacts identified small dollar business lending, and affordable housing (both purchase and rental) as specific needs within the Chester, PA / New Castle, DE assessment area, and as indicated above, the vast majority of investment dollars supported affordable housing initiatives.

Community Development Initiatives

First Citizens makes occasional use of innovative and/or complex investments to support community development initiatives. In the Chester, PA / New Castle, DE assessment area, two of the bank’s qualified investments were LIHTCs through a CDFI. These investments supported the construction of low-income housing and carried more complexity than simple donations.

SERVICE TEST

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

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

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

Accessibility of Delivery Systems

Delivery systems are accessible to the bank’s geographies and individuals of different income levels in its assessment areas.

During the review period, First Citizens operated three full-service branches in the Chester, PA / New Castle, DE assessment area (10% of the bank’s total branches). Using 2015 ACS data, no branches were located in low-income census tracts, and one branch was located in a moderate-income census tract (33%). Additionally, two branches (67%) were located in middle-income tracts. The following table details the locations of the bank’s branches with comparison to 2015 ACS population demographics, and shows that branches are proximate to areas where the majority of the population resides.

First Citizens Community Bank Chester, PA / New Castle, DE Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent of Population
Low	0	0.0	45,428	4.3
Moderate	1	33.3	227,880	21.5
Middle	2	66.7	435,630	41.1
Upper	0	0.0	347,166	32.8
Unknown Income	0	0.0	3,336	0.3
Totals	3	100.0	1,059,440	100.0

An ATM is available at one of the bank’s branch locations¹³, which provides electronic access to banking services. To supplement traditional banking services, First Citizens provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes remote deposit capture capabilities. Customers can pay bills, open accounts and apply for loan products via the bank’s website at <https://www.firstcitizensbank.com>.

Changes in Branch Locations

First Citizens’ record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. The bank entered the assessment area in April 2020 when it acquired two branches located in Wilmington, Delaware through its acquisition of MidCoast Community Bank. One of the two branches was located in a moderate-income tract, and the other was located in a middle-income tract. In November 2020, the bank opened a third branch in a middle-income tract in Kennett Square, Pennsylvania. No branches have been closed in this assessment area during the evaluation period.

¹³The Kennett Square branch (741 West Cypress Street, Kennett Square, PA 19348), located in middle-income census tract has a drive-up ATM. The other two branch locations, namely the Kirkwood branch (4900 Kirkwood Highway, Wilmington, DE 19808), and the Concord Pike branch (2901 Concord Pike, Wilmington, DE 19803) do not have ATMs.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned above, one of First Citizens' branches in the assessment area includes an ATM which is equipped with both English and Spanish languages. Of the three branches in the assessment area, one branch is equipped with a drive-through facility.¹⁴ All three branches operate Monday through Friday, with extended hours on Friday. In addition, two of the bank's three branches offer Saturday morning hours.¹⁵

Bank Products

First Citizens offers a deposit product that provides greater access to banking services for low- and moderate-income customers. The bank's free checking account is a consumer account with no minimum daily balance requirement, and no monthly service fee. The account features unlimited check writing capabilities, free online, mobile and telephone banking, and a free debit card. A minimum \$50 deposit is required to open the account.

The bank also offers a low-cost business checking account for small businesses with limited transaction activity. The account offers 400 free deposit items, and up to 50 paid checks with no monthly service charge if the monthly minimum average balance of \$500 is maintained, or if deposits of at least \$10 thousand are maintained between all accounts open at the bank. If neither minimum balance is met, the account is subject to a \$10 monthly fee. Finally, First Citizens offers cash management services, such as merchant card services, which allows businesses to accept payments from all major credit and debit cards, thus eliminating long waits between receivables and collecting NSF checks.

Community Development Services

First Citizens provides a relatively high level of community development services in this assessment area.

Though the bank has only been in the Chester, PA / New Castle, DE assessment area since 2020, four staff members served in various capacities on boards and committees of community development organizations, and provided technical assistance to community development organizations. Some notable examples include:

- The bank's CRA/Fair Lending Officer is a committee member for the Delaware Bankers Association's "Teach Children to Save Day" initiative, which organizes an annual financial literacy instruction event that targets low- and moderate-income students. Another bank employee served as an instructor for this initiative.

¹⁴The Kennett Square branch (741 West Cypress Street, Kennett Square, PA 19348), located in a middle-income census tract is equipped with a drive-through facility. The other two branches, namely the Kirkwood branch (4900 Kirkwood Highway, Wilmington, DE 19808), and the Concord Pike branch (2901 Concord Pike, Wilmington, DE 19803) do not have drive-through facilities.

¹⁵The Kirkwood branch (4900 Kirkwood Highway, Wilmington, DE 19808), located in a moderate-income tract, and the Kennett Square branch (741 West Cypress Street, Kennett Square, PA 19348), located in middle-income census tract offer Saturday hours. The Concord branch (2901 Concord Pike, Wilmington, DE 19803) does not offer Saturday hours.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

- Two bank employees are on the committee for survey and data collection for Reach Riverside, a nonprofit focused on the revitalization of Wilmington's Riverside neighborhood, a low-income neighborhood in northeast Wilmington.
- A bank employee is a board member at Chester County's Children, a nonprofit that provides financial aid for low- and moderate-income families in need, as well as summer recreational activities.

Additionally, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative". Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB of Pittsburgh, on their behalf.

STATE OF NEW YORK / ALLEGANY, NY ASSESSMENT
AREA
FULL-SCOPE REVIEW

STATE RATING

Performance Test	Performance Level
Lending	Needs to Improve
Investment	Substantial Noncompliance
Service	Low Satisfactory
Overall	Needs to Improve

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects adequate penetration among retail customers and farms of different income levels, and adequate distribution among businesses of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area, with adequate penetration with regard to HMDA lending, and poor penetration with regard to small business lending;
- The bank makes little use of innovative and/or flexible lending practices;
- The bank makes few, if any community development loans;
- The bank makes few, if any, of qualified community development investments and grants; and
- The bank provides an adequate level of community development services.

SCOPE OF EXAMINATION

For purposes of this CRA evaluation, the state rating is based solely on the bank's performance in the Allegany, NY assessment area, which was evaluated using full-scope review procedures. First Citizens operates just one branch in the Allegany, NY assessment area, located in the village of Wellsville. The assessment area consists of the entirety of Allegany County, New York, a non-MSA geography in the Southern Tier of New York State.

The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development loans. Due to loan volumes, HMDA loans were given more weight in determining lending test conclusions, followed by small business loans.

For purposes of assessing First Citizens' overall CRA performance, little weight was given to the bank's performance in the state of New York, as the overwhelming majority of the bank's operations are located in the Pennsylvania assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

The Allegany, NY assessment area consists of the entirety of Allegany County in New York. The Allegany, NY assessment area is a non-MSA area in the state of New York, which is located just north of First Citizens' Northern Tier, PA assessment area, which is also a non-MSA area.

For purposes of assessing First Citizens' overall CRA performance, the Allegany, NY assessment area was assigned the second least amount of weight, with only the Dover, DE assessment area receiving less consideration. First Citizens operated only one branch in this assessment area (3% of total branches), which held just over \$44 million in deposits, accounting for 3% of the bank's total deposits as of June 30, 2021. In total, loans made in the Allegany, NY assessment area accounted for 4% of the bank's total loans by number, and 2% by dollar volume.

First Citizens' CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Allegany, NY assessment area consisted of 13 census tracts. Of these 13 tracts, no tracts were designated as low-income, one tract (8%) was moderate-income, 11 tracts (just under 85%) were middle-income, and no tracts were upper-income. Additionally, one of the tracts (8%) had an unknown income level. The single moderate-income tract was located in the village of Belmont, which is also the county seat, while the unknown income tract consisted of Oil Spring Reservation, an Indian reservation of the federally recognized Seneca Nation. The assessment area had a population of 48,070 as of the 2015 ACS update.

A map of the Allegany, NY assessment area using the 2015 ACS data is available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, there were three depository institutions operating in the Allegany, NY assessment area. These institutions maintained a total of 14 branches holding over \$700 million in deposits. First Citizens, with one branch in the assessment area, ranked third, with just over \$44 million, or 6% of the deposit market. Community Bank, N.A. held the largest share of deposits with nearly 86% of the market, followed by Five Star Bank, with 8% of the market.

First Citizens reports home-mortgage loans pursuant to HMDA, and was compared to the aggregate of all lenders in the assessment area reporting real estate loans pursuant to HMDA. This data is reported annually. According to 2018 HMDA aggregate data, there were 85 HMDA reporters in the assessment area, who originated or purchased a total of 581 HMDA loans in the Allegany, NY assessment area. First Citizens ranked fourth with just under 5% of the HMDA market. Community Bank, N.A. led the market with 29% of HMDA loans, followed by Steuben Trust Company with 9%, and Quicken Loans, Inc. with almost 7%.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

According to 2019 HMDA aggregate data, there were 72 HMDA reporters in the assessment area, who originated or purchased a total of 615 HMDA loans in the Allegany, NY assessment area. First Citizens ranked seventh with 3% of the HMDA market. Community Bank, N.A. led the market with 32% of the loans, followed by Steuben Trust Company with 9%, and Quicken Loans, Inc. with 5%.

Finally, according to 2020 HMDA aggregate data, there were 79 HMDA reporters in the assessment area, who originated or purchased a total of 627 HMDA loans in the Allegany, NY assessment area. First Citizens ranked fourth with 4% of the HMDA market. Community Bank, N.A. led the market with 35% of the HMDA market, followed by Quicken Loans, LLC with 10%, and Wells Fargo Bank, N.A. with 4%.

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually, and is presented below for the years reviewed. According to 2018 data, there were 44 small business reporters in the assessment area, originating or purchasing 601 small business and small farm loans. First Citizens tied for tenth with 3% of the market. Steuben Trust Company ranked first with 22% of the market, followed by The Bank of Castile with 10%, and American Express, NB with 9%.

According to 2019 data, there were 42 small business reporters in the assessment area, originating or purchasing 580 loans. First Citizens ranked twelfth with nearly 3% of the market. Steuben Trust Company led the market with 18% market share, followed by The Bank of Castile with 10%, and American Express, NB with nearly 9%.

Finally, according to 2020 data, there were 44 small business reporters in the assessment area, originating or purchasing 650 small business and small farm loans. First Citizens ranked fourth with almost 5% of the market. Community Bank, N.A. ranked first with 28% of the market, followed by American Express, NB with 20%, and The Bank of Castile with 8%.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit needs of the Allegany, NY assessment area. One interview was held with an organization focused on economic development, and the other interview was held with a community action organization. Both contacts identified affordable housing, both for purchase and rental, as a critical need in the assessment area. Contacts also noted that the housing stock is quite old, and in need of rehabilitation. Both contacts indicated that the assessment area has an aging population, and is considered to be an economically depressed area, even prior to the pandemic. It was noted that small business credit is needed, and that day-care services are needed for working parents.

Economic Characteristics

Allegany County, NY is located in the Southern Tier of Western New York, which borders Pennsylvania. The area is quite rural, and is known for its abundant farmland and state forest land. It is home to three colleges, Alfred University, Alfred State College, and Houghton College.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

Leading industries in the Allegany, NY assessment include educational services (18%), manufacturing (15%), and healthcare and social assistance (15%). According to Invest Buffalo Niagara, major employers in the county include Alstom Power, Alfred University, Jones Memorial Hospital, Houghton College, and Friendship Dairies.

Seasonally unadjusted unemployment rates for the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are reflected in the following table. During the evaluation period, seasonally unadjusted unemployment rates in the Allegany, NY assessment area increased as economic conditions degraded. As depicted in the table, unemployment rates in the assessment area exceeded those in the state of New York and nationwide.

First Citizens Community Bank Allegany, NY Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	% 2018 Annual	% 2019 Annual	% 2020 Annual
Allegany County, NY	5.6	5.3	8.1
State of New York	4.1	3.8	10.0
United States	3.9	3.7	8.1

Unemployment data is from the Bureau of Labor Statistics.

Housing

According to 2015 ACS data, the Allegany, NY assessment area contained 26,024 housing units, 51% of which were owner-occupied, 19% of which were rentals, and 30% of which were vacant. The overall owner-occupancy rate in the assessment area (51%) was slightly higher than in the state of New York overall (48%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to the 2015 ACS data, 8% of owner-occupied housing units were located in moderate-income census tracts, and nearly 92% were located in middle-income tracts. It is noted that there were no low- or upper-income census tracts in the assessment area.

Of the total existing housing units, 72% were single family units, 8% were two-to-four family units, 4% were multifamily units, and 16% were mobile homes. The median age of housing was 57 years, making it comparable to the age of the housing stock statewide (59 years).

Data shows that the price of housing in the assessment area was significantly less than the state overall. The 2015 ACS data the median housing value in the Allegany, NY assessment area was \$70,286 which was a quarter of the median housing value in the State of New York overall (\$283,400). The median housing value was \$51,802 in moderate-income tracts, and \$71,957 in middle-income tracts. Again, it is noted that there are no low- or upper-income census tracts in the assessment area.

Similarly, median gross rent (rent plus utilities) in the assessment area was significantly lower in the assessment area than in the State of New York as a whole. Median gross rent in the Allegany, NY assessment area was \$606, making it far more affordable than the statewide median gross rent of \$1,132. Within the Allegany, NY assessment area, 48% of renters spend more than 30% of their income on rent, in contrast to nearly 51% in the State of New York.

Borrower Income Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. Using 2015 ACS data, of the 11,838 families in the assessment area, 22% were designated as low-income, 22% were moderate-income, 23% were middle-income, and 33% were upper-income. In the assessment area, 12% of families were living below the poverty level, which matched the same measure in the state of New York overall.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon HUD annually-adjusted median family income data made available by the FFIEC.

The assessment area’s median family incomes for 2018, 2019, and 2020 are listed in the following table, categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2018	\$64,300	\$32,150	\$32,150 - \$51,439	\$51,440 - \$77,159	\$77,160 or more
2019	\$66,200	\$33,100	\$33,100 - \$52,959	\$52,960 - \$79,439	\$79,440 or more
2020	\$67,200	\$33,600	\$33,600 - \$53,759	\$53,760 - \$80,639	\$80,640 or more

Geographic Business Data

The percentage of businesses located within designated tracts is used as a proxy to estimate demand for business credit within such tracts. According to business data provided by Dun & Bradstreet in 2018, there were 1,359 businesses in the Allegany, NY assessment area. Within the assessment area, 8% of the businesses were located in moderate-income tracts, and 92% were located in middle-income tracts. There were no low- or upper-income tracts in the assessment area. Business demographic data also revealed that of the 1,359 businesses located in the assessment area, 88% were small businesses with gross annual revenues of \$1 million or less.

Using 2019 Dun & Bradstreet data, there were 1,363 businesses in the Allegany, NY assessment area. Within the assessment area, almost 8% of the businesses were located in moderate-income tracts, 92% were located in middle-income tracts, and less than 1% were in unknown-income tracts. There were no low- or upper-income tracts in the assessment area. During 2019, 89% of businesses were small businesses with gross annual revenues of \$1 million or less.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

Finally, according to business data provided by Dun & Bradstreet in 2020, there were 1,333 businesses in the Allegany, NY assessment area. Within the assessment area, 8% of the businesses were located in moderate-income tracts, almost 92% were located in middle-income tracts, and less than 1% were in unknown-income tracts. There were no low- or upper-income tracts in the assessment area. During 2020, 89% of businesses were small businesses with gross annual revenues of \$1 million or less.

The demographics used in evaluating First Citizens' performance under the CRA in the Allegany, NY assessment area are detailed in the tables on the following pages.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Allegany, NY Assessment Area (Non-MSA) Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,568	21.7
Moderate-income	1	7.7	952	8.0	203	21.3	2,631	22.2
Middle-income	11	84.6	10,880	91.9	1,253	11.5	2,749	23.2
Upper-income	0	0.0	0	0.0	0	0.0	3,890	32.9
Unknown-income	1	7.7	6	0.1	0	0.0	0	0.0
Total Assessment Area	13	100.0	11,838	100.0	1,456	12.3	11,838	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,048	1,091	8.2	53.3	480	23.4	477	23.3
Middle-income	23,966	12,282	91.8	51.2	4,426	18.5	7,258	30.3
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	10	0	0.0	0.0	6	60.0	4	40.0
Total Assessment Area	26,024	13,373	100.0	51.4	4,912	18.9	7,739	29.7
	Total Businesses by Tract		Businesses 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	107	7.9	84	7.0	14	14.7	9	14.3
Middle-income	1,249	91.9	1,114	92.8	81	85.3	54	85.7
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	3	0.2	3	0.2	0	0.0	0	0.0
Total Assessment Area	1,359	100.0	1,201	100.0	95	100.0	63	100.0
Percentage of Total Businesses:			88.4		7.0		4.6	
	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	5	4.2	5	4.3	0	0.0	0	0.0
Middle-income	113	95.8	110	95.7	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	118	100.0	115	100.0	3	100.0	0	0.0
Percentage of Total Farms:			97.5		2.5		0.0	

2015 ACS Data and 2018 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Allegany, NY Assessment Area (Non-MSA) Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,568	21.7
Moderate-income	1	7.7	952	8.0	203	21.3	2,631	22.2
Middle-income	11	84.6	10,880	91.9	1,253	11.5	2,749	23.2
Upper-income	0	0.0	0	0.0	0	0.0	3,890	32.9
Unknown-income	1	7.7	6	0.1	0	0.0	0	0.0
Total Assessment Area	13	100.0	11,838	100.0	1,456	12.3	11,838	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,048	1,091	8.2	53.3	480	23.4	477	23.3
Middle-income	23,966	12,282	91.8	51.2	4,426	18.5	7,258	30.3
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	10	0	0.0	0.0	6	60.0	4	40.0
Total Assessment Area	26,024	13,373	100.0	51.4	4,912	18.9	7,739	29.7
	Total Businesses by Tract	Businesses 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	106	7.8	84	7.0	12	13.5	10	15.2
Middle-income	1,254	92.0	1,121	92.8	77	86.5	56	84.8
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	3	0.2	3	0.2	0	0.0	0	0.0
Total Assessment Area	1,363	100.0	1,208	100.0	89	100.0	66	100.0
Percentage of Total Businesses:			88.6		6.5		4.8	
	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	6	5.0	6	5.2	0	0.0	0	0.0
Middle-income	113	95.0	110	94.8	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	119	100.0	116	100.0	3	100.0	0	0.0
Percentage of Total Farms:			97.5		2.5		0.0	

2015 ACS Data and 2019 D&B Information

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Alleghany, NY Assessment Area (Non-MSA) Assessment Area Demographics 2020									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	2,568	21.7	
Moderate-income	1	7.7	952	8.0	203	21.3	2,631	22.2	
Middle-income	11	84.6	10,880	91.9	1,253	11.5	2,749	23.2	
Upper-income	0	0.0	0	0.0	0	0.0	3,890	32.9	
Unknown-income	1	7.7	6	0.1	0	0.0	0	0.0	
Total Assessment Area	13	100.0	11,838	100.0	1,456	12.3	11,838	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate-income	2,048	1,091	8.2	53.3	480	23.4	477	23.3	
Middle-income	23,966	12,282	91.8	51.2	4,426	18.5	7,258	30.3	
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0	
Unknown-income	10	0	0.0	0.0	6	60.0	4	40.0	
Total Assessment Area	26,024	13,373	100.0	51.4	4,912	18.9	7,739	29.7	
	Total Businesses by Tract		Businesses 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	109	8.2	86	7.3	12	14.1	11	17.2	
Middle-income	1,221	91.6	1,095	92.5	73	85.9	53	82.8	
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown-income	3	0.2	3	0.2	0	0.0	0	0.0	
Total Assessment Area	1,333	100.0	1,184	100.0	85	100.0	64	100.0	
			Percentage of Total Businesses:		88.8		6.4		4.8
	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	5	4.3	5	4.5	0	0.0	0	0.0	
Middle-income	110	95.7	107	95.5	3	100.0	0	0.0	
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	115	100.0	112	100.0	3	100.0	0	0.0	
			Percentage of Total Farms:		97.4		2.6		0.0

2015 ACS Data and 2020 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

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

Performance under the lending test is rated needs to improve in the Allegany, NY assessment area.

Lending Activity

First Citizens' lending levels in the Allegany, NY assessment area reflect adequate responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Allegany, NY assessment area represented 4% of the bank's overall lending by number of loans, and 2% by dollar volume. Through the bank's one branch location in the Allegany, NY assessment area, First Citizens made 71 HMDA loans totaling over \$4 million, and 44 small business loans totaling over \$3.6 million.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance, due to the demographic make-up of the assessment area. Further, due to loan volumes, HMDA loans are given the most weight in determining the bank's overall borrower distribution of loans, followed by small business.

Home-Mortgage Lending

First Citizens' distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is adequate.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 22% of families in the assessment area were designated as low-income, 22% were moderate-income, 23% were middle-income, and 33% were upper-income. According to 2015 ACS data, 44% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following table compares First Citizens’ home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data, following the requirements of Regulation C.

First Citizens Community Bank Allegany, NY Assessment Area Distribution of HMDA Loans by Borrower Income Level							
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison					
		2018		2019		2020	
		% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending
Low	21.7	11.1	12.2	15.8	11.2	0.0	8.9
Moderate	22.2	22.2	22.9	10.5	25.0	20.0	19.5
Middle	23.2	25.9	26.0	31.6	23.7	40.0	25.2
Upper	32.9	40.8	29.4	42.1	30.7	40.0	34.4
Unknown	0.0	0.0	9.5	0.0	9.4	0.0	12.0
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, First Citizens’ lending to low-income borrowers was adequate.

In assessing the level of the bank’s lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

First Citizens’ lending in 2018 to low-income borrowers was adequate. In total, 11% of the bank’s HMDA loans (three loans) were originated to low-income borrowers, which was below the aggregate lending level of 12%, and below the proxy of 22%. By loan category, First Citizens originated 20% of its home purchase loans (two loans), 17% of other purpose closed/exempt loans (one loan), and no refinance, home improvement, multifamily, or loans with purpose “not applicable” to low-income borrowers. In comparison, aggregate lenders made 9% of home purchase loans, 18% of refinance loans, 18% of home improvement loans, 12% of other purpose closed/exempt loans, and no multifamily, or loans with purpose “not applicable” to low-income borrowers in 2018.

First Citizens' lending in 2019 to low-income borrowers was good. In total, 16% of the bank's HMDA loans (three loans) were originated to low-income borrowers, which was above the aggregate lending level of 11%, but below proxy of 22%. By loan category, First Citizens originated 29% of its home purchase loans (two loans), 11% of its refinance loans (one loan), and no home improvement, multifamily, or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 12% of home purchase loans, 12% of refinance loans, 9% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to low-income borrowers in 2019.

First Citizens' lending in 2020 to low-income borrowers was poor. In 2020, none of the bank's HMDA loans were originated to low-income borrowers, which was below the aggregate lending level of 9%, and below proxy of 22%. By product type, aggregate lenders made 9% of home purchase loans, 7% of refinance loans, 15% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to low-income borrowers in 2020.

Lending to Moderate-Income Borrowers

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

First Citizens' lending in 2018 to moderate-income borrowers was good. In total, 22% of the bank's HMDA loans (six loans) were originated to moderate-income borrowers, which was just below the aggregate lending level of 23%, and equal to proxy of 22%. By loan category, First Citizens originated 20% of its home purchase loans (two loans), 50% of its refinance loans (three loans), 17% of other purpose closed/exempt loans (one loan), and no home improvement, multifamily, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 26% of home purchase loans, 18% of refinance loans, 23% of home improvement loans, 30% other purpose closed/exempt, and no multifamily, or loans with purpose "not applicable" to moderate-income borrowers in 2018.

First Citizens' lending in 2019 to moderate-income borrowers was poor. In total, 11% of the bank's HMDA loans (two loans) were originated to moderate-income borrowers, which was significantly below the aggregate lending level of 25%, and the proxy of 22%. By product type, First Citizens originated 11% of its refinance loans (one loan), 100% of its home improvement loans (one loan), and no home purchase, multifamily, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 26% of home purchase loans, 27% of refinance loans, nearly 31% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to moderate-income borrowers in 2019.

Finally, First Citizens' lending in 2020 to moderate-income borrowers was good. In total, 20% of the bank's HMDA loans (five loans) were originated to moderate-income borrowers, which matched the aggregate lending level of 20%, and was just below proxy of 22%. By loan category, First Citizens originated 13% of its home purchase loans (one loan), 15% of its refinance loans (two loans), 50% of its home improvement loans (one loan), 50% of other purpose closed/exempt (one loan), and no multifamily or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 20% of home purchase loans, 19% of refinance loans, 28% of home

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

improvement loans, and no multifamily, or loans with purpose “not applicable” to moderate-income borrowers in 2020.

Small Business Lending

An analysis of First Citizens’ borrower distribution of small business loans reflects adequate 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 analyzed to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the Allegany, NY assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to 2018 Dun & Bradstreet business demographic data, there were 1,359 businesses in the assessment area, with 88% designated as small businesses. In 2019, there were 1,363 businesses in the assessment area, with 89% designated as small businesses. Finally, in 2020, there were 1,333 businesses in the assessment area, with 89% designated as small businesses.

In 2018, the bank’s borrower distribution of small business loans was adequate. In 2018, First Citizens originated eight small business loans within the assessment area, aggregating \$846 thousand. Of these loans, 38% were originated to small businesses (three loans). This performance was below the aggregate lending level of 59% to small businesses, and below the proxy of 88%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus, added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2018, 63% of First Citizens’ small business loans were extended in amounts of \$100 thousand or less (five loans). Aggregate data indicates that 89% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2019, the bank’s borrower distribution of small business loans was adequate. In 2019, First Citizens originated 11 small business loans within the assessment area, aggregating \$672 thousand. Of these loans, 36% were originated to small businesses (four loans). This performance was below the aggregate lending level of 56% to small businesses, and below the proxy of 89%.

In 2019, 91% of First Citizens’ small business loans were extended in amounts of \$100 thousand or less (10 loans). Aggregate data indicates that almost 95% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Finally, in 2020, the bank’s borrower distribution of small business loans was poor. In 2020, First Citizens originated 25 small business loans within the assessment area, aggregating \$2.1 million. Of these loans, 16% were originated to small businesses (four loans).¹⁶

¹⁶Notably, in 2020, 68% of small business loans in the assessment area were originated to businesses of unknown income (17 loans). This is attributable to the bank’s participation in the Small Business Administration’s (SBA) Paycheck Protection Program (PPP). In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provides small businesses with funds to pay up to eight weeks of payroll costs

This performance was below the aggregate lending level of 33% to small businesses, and the proxy of 89%.

In 2020, 80% of First Citizens' small business loans were extended in amounts of \$100 thousand or less (20 loans). Aggregate data indicates that 89% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the Allegany, NY assessment area, including in low- and moderate-income tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount, followed by small business loans. Additionally, it is noted that because the assessment area contained no low-income tracts, the geographic distribution analysis is based solely on the bank's performance in moderate-income census tracts.

Home-Mortgage Lending

First Citizens' distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is adequate.

As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending 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 the 2015 ACS data, 8% of the assessment area's owner-occupied housing units were located in moderate-income census tracts, and 92% were located in middle-income tracts. There were no low- or upper-income census tracts in the assessment area, and hence, none of the owner-occupied housing units were found in either tract type.

The following table presents First Citizens' geographic distribution of HMDA loans from 2018, 2019, and 2020 in comparison to the applicable owner-occupied housing proxy and the aggregate lending levels in the assessment area. The tables rely on 2015 ACS data, along with updated HMDA data, which follows Regulation C requirements.

including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. Under this program, institutions were not required to collect revenue information. For context, on the entire First Citizens' 2020 CRA LAR, 59% of the reported loans were PPP loans which were reported without revenue (584 loans).

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Allegany, NY Assessment Area Geographic Distribution of HMDA Loans							
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison					
		2018		2019		2020	
		% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending	% First Citizens Lending	% Aggregate Lending
Low	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Moderate	8.2	7.4	5.9	5.3	5.0	0.0	6.9
Middle	91.8	92.6	94.1	94.7	95.0	100.0	93.1
Upper	0.0	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	0.0
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Lending in Moderate-Income Census Tracts

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

First Citizens’ lending in moderate-income census tracts in 2018 was good. In 2018, First Citizens’ HMDA lending in moderate-income tracts was 7% (two loans), which measured above the aggregate performance of 6%, but was below the proxy of owner-occupied housing in moderate-income tracts of 8%. Categorized by loan type, First Citizens made 10% of its home purchase loans (one loan), 20% of its home improvement loans (one loan), and no refinance, multifamily, or loans with purpose “not applicable” in moderate-income tracts in 2018. Aggregate lending data shows that 7% of home purchase loans, 6% of refinance loans, 5% of home improvement loans, 8% of loans with purpose “not applicable,” and no multifamily loans were made in moderate-income tracts in the assessment area in 2018.

First Citizens’ lending in moderate-income census tracts in 2019 was adequate. In 2019, First Citizens’ HMDA lending in moderate-income tracts was 5% (one loan), which matched aggregate lending (5%), but trailed the proxy of 8% of owner-occupied housing in moderate-income tracts. The bank’s single HMDA loan made in a moderate-income tract was a home purchase loan (14%). By product type, aggregate lenders made 5% of home purchase loans, 4% of refinance loans, 10% of home improvement loans, 9% of loans with purpose “not applicable,” and no multifamily loans in moderate-income tracts in the assessment area in 2019.

First Citizens’ lending in moderate-income census tracts in 2020 was poor. In 2020, First Citizens made no HMDA loans in moderate-income tracts, which measured below aggregate lending performance of 7% and the proxy of owner-occupied housing in moderate-income tracts, of 8%. By product type, aggregate lenders made 7% of home purchase loans, 7% of refinance loans, 15% of home improvement loans, and no multifamily, or loans with purpose “not applicable” in moderate-income tracts in the assessment area in 2020.

Small Business Lending

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

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. It is noted that there are no low-income or upper-income census tracts in the assessment area. According to Dun & Bradstreet data in 2018, 8% of the businesses were located in moderate-income tracts, and 92% were located in middle-income tracts. In 2019, just under 8% of the businesses were located in moderate-income tracts, 92% were located in middle-income tracts, and less than 1% were in unknown-income tracts. In 2020, 8% of the businesses were located in moderate-income tracts, just under 92% were located in middle-income tracts, and less than 1% were in unknown-income tracts.

The tables below present First Citizens’ small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for 2018, 2019, and 2020.

First Citizens Community Bank Allegany, NY Assessment Area Geographic Distribution of Small Business Loans				
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison		
		2018		
		% First Citizens Lending	% Aggregate Lending	
Low	0.0	0.0	0.0	
Moderate	7.9	0.0	7.2	
Middle	91.9	100.0	91.5	
Upper	0.0	0.0	0.0	
Unknown	0.2	0.0	1.3	
Total	100.0	100.0	100.0	

First Citizens Community Bank Allegany, NY Assessment Area Geographic Distribution of Small Business Loans				
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison		
		2019		
		% First Citizens Lending	% Aggregate Lending	
Low	0.0	0.0	0.0	
Moderate	7.8	0.0	6.5	
Middle	92.0	100.0	91.5	
Upper	0.0	0.0	0.0	
Unknown	0.2	0.0	2.0	
Total	100.0	100.0	100.0	

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank Allegany, NY Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2020	
		% First Citizens Lending	% Aggregate Lending
Low	0.0	0.0	0.0
Moderate	8.2	4.0	6.6
Middle	91.6	96.0	92.9
Upper	0.0	0.0	0.0
Unknown	0.2	0.0	0.5
Total	100.0	100.0	100.0

Lending in Moderate-Income Census Tracts

First Citizens’ small business lending in moderate-income tracts is poor.

In 2018, the geographic distribution of the bank’s small business lending in moderate-income census tracts was poor. First Citizens originated none of its small business loans in the assessment area’s moderate-income census tract. The bank’s lending level was below the 2018 aggregate small business lending level of 7%, and the proxy of businesses located in moderate-income tracts, at 8%.

In 2019, the geographic distribution of the bank’s small business lending in moderate-income census tracts was poor. First Citizens bank’s small business loans were made in the assessment area’s moderate-income census tract. The bank’s lending level was once again below the 2019 aggregate small business lending level of nearly 7%, and proxy of 8%.

Finally, in 2020, the geographic distribution of the bank’s small business lending in moderate-income census tracts was poor. First Citizens originated 4% of its small business loans (one loan) in the assessment area’s moderate-income census tract. The bank’s lending level was below the 2020 aggregate small business lending level of nearly 7%, and the proxy of 8%.

Responsiveness to Credit Needs

First Citizens exhibits a poor record of serving the credit needs of low- and moderate-income borrowers and areas and very small businesses, consistent with safe and sound banking practices. As discussed in more detail below, little use of innovative and flexible lending practices was noted, and the bank made no community development loans in the assessment area. However, the bank adequately addressed home-mortgage and small business lending needs through its retail lending.

Innovative and/or Flexible Lending Practices

First Citizens makes little use of innovative and/or flexible lending practices in serving the Allegany, NY assessment area credit needs.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Allegany, NY assessment area, the bank made two Freddie Mac Home Possible loans totaling just under \$122 thousand.

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, First Citizens participates in SBA loan programs, and is a preferred SBA Express Lender. During the evaluation period, First Citizens made two SBA loans for just under \$42 thousand in the Allegany, NY assessment area.

Community Development Lending

First Citizens makes few, if any community development loans in the Allegany, NY assessment area. During the period evaluated, the bank made no community development loans in the assessment area.

INVESTMENT TEST

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

Performance under the investment test is assessed as substantial noncompliance.

Volume of Investment and Grant Activity

First Citizens makes few, if any qualified community development investments and grants. During the evaluation period, the bank made no qualified investments, and made only \$900 in donations in the Allegany, NY assessment area. Of the bank's total investments, less than 1% were made in the Allegany, NY assessment area.

The single donation supported community services to low- and moderate-income individuals.

It is noted that the bank's volume of qualified investments and donations decreased since the prior evaluation, when the \$2,900 in donations was considered to be poor. Though the bank has operated in the Allegany, NY assessment area for several CRA evaluation cycles, qualified investment performance has historically been very low, and has not improved appreciably or sustainably over time.

The following table presents the qualified investment and donation activity for the Allegany, NY assessment area.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank Allegany, NY Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	0	0	0	0	0	0	0	0	0	0
Donations	0	0	1	1	0	0	0	0	1	1
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	1	1	0	0	0	0	1	1

Responsiveness to Credit and Community Development Needs

First Citizens exhibits very poor responsiveness to credit and community development needs of the assessment area.

Community contacts identified affordable housing (both rental and purchase), and small business credit as specific needs within the Allegany, NY assessment area. As indicated above, the bank made no qualified investments, and only one donation for \$900 in the assessment area, which provided community development services to low- and moderate-income individuals.

Community Development Initiatives

First Citizens makes no use of innovative and/or complex investments to support community development initiatives. As indicated above, the bank made one single \$900 donation, which was neither innovative nor complex.

SERVICE TEST

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

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

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

Accessibility of Delivery Systems

Delivery systems are accessible to the bank’s geographies and individuals of different income levels in its assessment areas. During the review period, First Citizens operated one full-service branches in the Allegany, NY assessment area, which was located in a middle-income census tract. As of the 2015 ACS update, 92% of the population resided in the assessment area’s middle-income tracts. The following table details the locations of the bank’s branch with comparison to 2015 ACS population demographics.

First Citizens Community Bank Allegany, NY Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent Branches	Population	Percent of Population
Low	0	0.0	0	0.0
Moderate	0	0.0	3,760	7.8
Middle	1	100.0	44,290	92.1
Upper	0	0.0	0	0.0
Unknown Income	0	0.0	20	< 0.1
Totals	1	100.0	48,070	100.0

The branch offers a drive-up ATM, which provides electronic access to banking services. To supplement traditional banking services, First Citizens provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes remote deposit capture capabilities. Customers can pay bills, open accounts and apply for loan products via the bank’s website at <https://www.firstcitizensbank.com>.

Changes in Branch Locations

First Citizens did not open or close any branches within the Allegany, NY assessment area during the evaluation period, and therefore this component of the service test was not considered in this assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned above, the single branch in the assessment area includes a drive-up ATM, and also offers a drive-through facility. The branch offers standard hours Monday through Friday, with extended hours on Thursdays. Finally, the branch offers limited Saturday morning hours through its drive-through.

Bank Products

First Citizens offers a deposit product that provides greater access to banking services for low- and moderate-income customers. The bank’s free checking account is a consumer account with no minimum daily balance requirement, and no monthly service fee. The account features unlimited check writing capabilities, free online, mobile, and telephone banking, and a free debit card. A minimum \$50 deposit is required to open the account.

The bank also offers a low-cost business checking account for small businesses with limited transaction activity. The account offers 400 free deposit items, and up to 50 paid checks with no monthly service charge if the monthly minimum average balance of \$500 is maintained, or if deposits of at least \$10 thousand are maintained between all accounts open at the bank. If neither minimum balance is met, the account is subject to a \$10 monthly fee. Finally, First Citizens offers cash management services, such as merchant card services, which allows businesses to accept payments from all major credit and debit cards, thus eliminating long waits between receivables and collecting NSF checks.

Community Development Services

First Citizens provides an adequate level of community development services in this assessment area.

Some notable examples of the community development services provide in the assessment area include:

- A bank employee provides financial education for small business owners through the New York State DECA Program, which is a state program that prepares emerging leaders and entrepreneurs in marketing, finance, hospitality, and management.
- A bank employee is on the executive board for Wellsville Development Corporation, which is a community-based corporation focuses on revitalization and economic development projects in the local Wellsville community.
- A bank employee is a committee member for Wellsville Chamber of Commerce, which focuses on economic development in Wellsville.

STATE OF DELAWARE / DOVER, DE ASSESSMENT AREA FULL-SCOPE REVIEW

STATE RATING

Performance Test	Performance Level
Lending	Needs to Improve
Investment	High Satisfactory
Service	Low Satisfactory
Overall	Needs to Improve

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects poor penetration among retail customers and farms of different income levels, and poor distribution among businesses of different sizes;
- The geographic distribution of loans reflects good penetration throughout the assessment area, both with regard to HMDA lending and small business lending;
- The bank makes no use of innovative and/or flexible lending practices;
- The bank makes few, if any community development loans;
- The bank has a significant level of qualified community development investments and grants; and
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

For purposes of this CRA evaluation, the state rating is based solely on the bank's performance in the Dover, DE assessment area, which was evaluated using full-scope review procedures. First Citizens operates just one branch in the Dover, DE assessment area, located in the city of Dover. The Dover, DE assessment area, which consists of the entirety of Kent County, DE, was added to the bank's assessment areas upon the acquisition of MidCoast Community Bank in April, 2020. Consequently, First Citizens' CRA performance in Delaware was evaluated for the period from April 17, 2020 through March 28, 2022.

The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development loans. Due to loan volumes, HMDA and small business loans were given equal weight in drawing performance conclusions for borrower and geographic distribution. In 2020, the bank originated 9 HMDA loans totaling \$4 million, and 10 small business loans totaling \$1.2 million.

For purposes of assessing First Citizens' overall CRA performance, very little weight was given to the bank's performance in this assessment area, as the share of lending, deposits and operations were the lowest in this assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

The Dover, DE assessment area consists of Kent County in the State of Delaware, which is coterminous with the Dover, DE MSA. The Dover, DE MSA is a part of the larger Philadelphia-Reading-Camden PA-NJ-DE-MD Combined Statistical Area. The assessment area is home to the city of Dover, which is both the capital of Delaware, and the county seat of Kent County.

As indicated previously, for purposes of assessing First Citizens' overall CRA performance, the least weight was given to performance in the Dover, DE assessment area in comparison to the bank's performance in its other six assessment areas. First Citizens operates only one branch in this assessment area (3%), which holds only \$34 million in deposits, accounting for 2% of the bank's total deposits as of June 30, 2021. In total, loans made in the Dover, DE assessment area accounted for under 1% of the bank's total loans by number, and just over 1% by dollar volume.

First Citizens' CRA performance in this assessment area was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Dover, DE assessment area was comprised of 33 census tracts. Of these 33 tracts, one tract (3%) was designated as low-income, six tracts (18%) were moderate-income, 21 tracts (64%) were middle-income, and four tracts (12%) were upper-income. One tract (3%) was of an unknown-income level. The majority of the low- and moderate-income census tracts in the assessment area are located in the city of Dover, DE. The unknown-income tract is the Dover Air Force Base. The Dover, DE assessment area had a population of 169,509 according to the 2015 ACS data.

A map of the Dover, DE assessment area using the 2015 ACS data is available in Appendix F.

According to the FDIC's Deposit Market Share Report, as of June 30, 2021, there were 11 depository institutions operating in the Dover, DE assessment area. These institutions maintained a total of 30 branches holding \$3.9 billion in deposits. First Citizens, with one branch in the assessment area, ranked tenth, with \$34 million, or 1% of the deposit market. Manufacturers & Traders Trust Company held the largest share of deposits with nearly 39% of the market, followed by Wilmington Savings Fund Society, FSB, with 20% of the market, and PNC Bank, N.A. with almost 15% of the market.

First Citizens reports home-mortgage loans pursuant to HMDA, and was compared to the aggregate of all lenders in the assessment area reporting real estate loans pursuant to HMDA. This data is reported annually. In 2020, the bank's first year of operation in the assessment area, there were 288 HMDA reporters in the assessment area, who originated or purchased a total of 10,388 HMDA loans in the Dover, DE assessment area. First Citizens was tied for seventy-fifth with less than 1% of the HMDA market. Freedom Mortgage Corporation led the market with almost 6% of the HMDA market, followed by Quicken Loans, LLC with just under 6%, and Wells Fargo Bank, N.A. with almost 5%.

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually, and is presented below for 2020, the single year that First Citizens operated in the market. According to 2020 data, there were 106 small business reporters in the assessment area, originating or purchasing 3,853 small business and small farm loans. First Citizens tied for thirty-ninth with less than 1% of the market. American Express, NB ranked first with 12% of the market, followed by Wilmington Savings Fund Society, FSB with 10%, and Manufacturers and Traders Trust Company with 9%.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit needs of the Dover, DE assessment area. Both interviews were held with organizations focused on affordable housing. These contacts identified affordable housing, both for purchase and rental, as a critical need in the assessment area. According to contacts, rising housing prices are pricing out low- and moderate-income individuals, and for every 100 people in need of affordable housing in the area, only 60 units are available. An increase in evictions and foreclosures is exacerbating the challenge. Additionally, one contact identified workforce development as an important need in the assessment area, as there is currently a mismatch between available jobs and the skills of the existing workforce. In terms of credit needs, contacts indicated a need for “patient financing” utilizing lower rates and longer loan terms, as well as funding for housing rehabilitation.

Economic Characteristics

According to the September 2021 Moody’s Precis report, the assessment area is currently in a recovery mode, fueled by a recovering leisure and hospitality industry, due to increased beach traffic and a strong housing market. Strengths of the Dover, DE MSA include favorable migration trends, above-average population growth, and low business costs, including office rents, taxes, and labor. Additionally, the economy benefits from stability from the Dover Air Force Base and state government employment. Conversely, weaknesses include a below-average per capita income, and few jobs in high-tech, higher-value-added services.

Leading industries in the Dover, DE assessment include government (29%), education and health services (16%), retail trade (13%), and leisure and hospitality services (10%). Leading employers in the assessment area include the Dover Air Force Base, Bayhealth Medical Center, Walmart, Inc., Perdue Farms, and Dover Downs Hotel and Casino.

While the institution only operated in the Dover, DE assessment area from April 2020 onward, for contextual purposes, area unemployment rates for years 2018, 2019, and 2020, as reported by the Bureau of Labor Statistics, are reflected in the following table. As depicted in the table, unemployment rates in the assessment area are above both rates in the state and nation as a whole.

First Citizens Community Bank Dover, DE Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	% 2018 Annual	% 2019 Annual	% 2020 Annual
Kent County, DE	4.1	4.1	8.3
Dover, DE MSA	4.1	4.1	8.3
State of Delaware	3.8	3.7	7.8
United States	3.9	3.7	8.1

Unemployment data is from the Bureau of Labor Statistics.

HOUSING

According to 2015 ACS data, the Dover, DE assessment area contained 67,315 housing units, 63% of which were owner-occupied, 27% of which were rentals, and 10% of which were vacant. The overall owner-occupancy rate in the assessment area (63%) was slightly higher than in the state of Delaware as a whole (59%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to the 2015 ACS data, less than 1% of owner-occupied housing was located in low-income census tracts, and 12% was located in moderate-income census tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (73% and 15%, respectively).

Of the total existing housing units, 74% were single family units, 3% were two-to four family units, 10% were multifamily units, and 13% were mobile homes. The median age of housing was 30 years, making it comparable in age to the housing stock statewide, where the median housing age was 33 years.

Data shows that the price of housing in the assessment area was less expensive than in the state of Delaware. The 2015 ACS data indicates that the median housing value in the Dover, DE assessment area was \$200,462, which is lower than the \$231,500 median housing value in the State of Delaware. The median housing value was \$162,931 in low-income tracts, and \$166,509 in moderate-income tracts. Values were notably higher in middle- and upper-income census tracts. More specifically, the median housing value in middle-income tracts was \$198,584, and was \$232,968 in upper-income tracts.

Similarly, median gross rent (rent plus utilities) in the assessment area was less expensive in the assessment area than in the State of Delaware as a whole. Median gross rent in the Dover, DE assessment area was \$984, which compared favorably to a statewide median gross rent of \$1,018. However, within the Dover, DE assessment area, almost 51% of renters spend more than 30% of their income on rent, in contrast to 46% in the State of Delaware.

Borrower Income Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS data shows that of the 42,277 families in the assessment area, almost 22% were designated as low-income, nearly 17% were moderate-income, 22% were middle-income, and 40% were upper-income. In the assessment area, just shy of 10% of families were living below the poverty level, compared to 8% in the State overall.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon HUD annually-adjusted median family income data made available by the FFIEC. The assessment area's median family income for 2020 are listed in the following table, categorized by the dollar amounts recognized as low-, moderate-, middle- and upper income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2020	\$68,400	\$34,200	\$34,200 - \$54,719	\$54,720 - \$82,079	\$82,080 or more

Geographic Business Data

The percentage of businesses located within designated tracts is used as a proxy to estimate demand for business credit within such tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data in 2020, the bank's first year in this assessment area, there were 8,069 businesses in the Dover, DE assessment area. Of these businesses, 14% of the businesses were located in low-income tracts, 13% were located in moderate-income tracts, 61% were located in middle-income tracts, and 12% of businesses were located in upper-income tracts. Business demographic data also revealed that of the 8,069 businesses located in the assessment area, 93% of businesses were small businesses with gross annual revenues of \$1 million or less.

The 2020 demographics used in evaluating First Citizens' performance under the CRA in the Dover, DE assessment area are detailed in the table on the following page.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

First Citizens Community Bank Dover, DE Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.0	489	1.2	189	38.7	9,119	21.6
Moderate-income	6	18.2	6,314	14.9	839	13.3	7,026	16.6
Middle-income	21	63.6	29,632	70.1	2,812	9.5	9,181	21.7
Upper-income	4	12.2	5,842	13.8	360	6.2	16,951	40.1
Unknown-income	1	3.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	33	100.0	42,277	100.0	4,200	9.9	42,277	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,051	315	0.7	30.0	635	60.4	101	9.6
Moderate-income	10,742	4,854	11.5	45.2	4,902	45.6	986	9.2
Middle-income	46,230	30,616	72.6	66.2	10,880	23.5	4,734	10.3
Upper-income	9,292	6,400	15.2	68.9	1,969	21.2	923	9.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	67,315	42,185	100.0	62.7	18,386	27.3	6,744	10.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,151	14.3	1,041	13.9	62	13.4	48	37.5
Moderate-income	1,068	13.2	959	12.8	90	19.5	19	14.8
Middle-income	4,911	60.9	4,596	61.4	262	56.8	53	41.4
Upper-income	939	11.6	884	11.9	47	10.3	8	6.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,069	100.0	7,480	100.0	461	100.0	128	100.0
Percentage of Total Businesses:				92.7		5.7		1.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.7	1	0.4	1	12.5	0	0.0
Moderate-income	25	9.0	22	8.2	3	37.5	0	0.0
Middle-income	243	87.7	238	88.8	4	50.0	1	100.0
Upper-income	7	2.6	7	2.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	277	100.0	268	100.0	8	100.0	1	100.0
Percentage of Total Farms:				96.8		2.9		0.4

2015 ACS Data and 2020 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

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

Performance under the lending test is rated needs to improve in the Dover, DE assessment area. It is noted that because the bank had just entered the assessment area in 2020, very little lending took place during the evaluation period.

Lending Activity

First Citizens' lending levels in the Dover, DE assessment area reflect poor responsiveness to the assessment area's credit needs. This conclusion takes into consideration that the bank just recently entered into the Dover, DE market, after acquiring a branch there in April 2020. During the evaluation period, lending activity in the Dover, DE assessment area represented less than 1% of the bank's overall lending by number of loans, and just over 1% by dollar volume. Through the bank's one branch location in the Dover, DE assessment area, First Citizens made nine HMDA loans totaling \$4.3 million and 10 small business loans totaling \$1.2 million in 2020.

Borrower Distribution of Lending

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

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance. Additionally, as noted previously, due to loan volumes, HMDA and small business loans are given equal weight in determining the bank's borrower distribution of loans. Finally, given that the bank entered the assessment area in 2020, results are based solely on lending during that single year.

Home-Mortgage Lending

First Citizens’ distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is poor.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families within the assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, approximately 22% of assessment area families were low-income, 17% were moderate-income, 22% were middle-income, and 40% were upper-income. According to 2015 ACS, 39% of families were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

The following table compares First Citizens’ home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table, used to evaluate lending in 2020, relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data, following the requirements of Regulation C.

First Citizens Community Bank Dover, DE Assessment Area Distribution of HMDA Loans by Borrower Income Level				
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison		
		2020		
		% First Citizens Lending	% Aggregate Lending	
Low	21.6	0.0	3.7	
Moderate	16.6	0.0	14.7	
Middle	21.7	0.0	21.0	
Upper	40.1	33.3	30.1	
Unknown	0.0	66.7	30.5	
Total	100.0	100.0	100.0	

Lending to Low-Income Borrowers

In assessing the level of the bank’s lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities. Additionally, it is noted that 2020 was the bank’s first year in this assessment area, and that results are based on a very small sample of loans (nine HMDA loans).

First Citizens' lending in 2020 to low-income borrowers was poor. None of the bank's HMDA loans were originated to low-income borrowers, which is below the aggregate lending level of 4%, and below proxy of 22%.¹⁷ By loan type, aggregate lenders made 5% of home purchase loans, 2% of refinance loans, 5% of home improvement loans, and no multifamily or loans with purpose "not applicable" to low-income borrowers in 2020.

Lending to Moderate-Income Borrowers

First Citizens' lending in 2020 to moderate-income borrowers was poor. In 2020, none of the bank's HMDA loans were originated to moderate-income borrowers, which is below the aggregate lending level of 15%, and below proxy of 17%.¹⁸ Aggregate lenders made 22% of home purchase loans, 10% of refinance loans, 13% of home improvement loans, no multifamily loans, and less than 1% of loans with purpose "not applicable" to moderate-income borrowers in 2020.

Small Business Lending

An analysis of First Citizens' borrower distribution of small business loans reflects poor 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 analyzed to identify those loans to businesses with gross annual revenues of \$1 million or less, namely small businesses.

The number of businesses operating in the Dover, DE assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to 2020 Dun & Bradstreet business demographic data, there were 8,069 businesses in the assessment area, with 7,480 (93%) designated as small businesses.

In 2020, the bank's borrower distribution of small business loans was poor. In 2020, First Citizens originated 10 small business loans within the assessment area, aggregating \$1.2 million. Of these loans, 10% (one loan) were originated to small businesses.¹⁹ This performance was below the aggregate lending level of 34% to small businesses, and well below the proxy of 93%.

¹⁷ Notably, in 2020 only nine (9) HMDA loans were made in this assessment area. Of the nine loans in the assessment area, six (6) were made to non-natural persons for which income is not required to be reported. As such, 67% of the loans reflected unknown income borrowers.

¹⁸ Notably, in 2020 only nine (9) HMDA loans were made in this assessment area. Of the nine loans in the assessment area, six (6) were made to non-natural persons for which income is not required to be reported. As such, 67% of the loans reflected unknown income borrowers.

¹⁹ Notably, in 2020, 80% of small business loans in the assessment area were originated to businesses of unknown income (8 loans). This is attributable to the bank's participation in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provides small businesses with funds to pay up to eight weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. Under this program, institutions were not required to collect revenue information. For context, on the entire First Citizens' 2020 CRA LAR, 59% of the reported loans were PPP loans which were reported without revenue (584 loans).

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2020, 70% of First Citizens' small business loans (seven loans) were extended in amounts of \$100 thousand or less. Aggregate data indicates that 87% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the Dover, DE assessment area, including low- and moderate-income tracts.

Once again, it is noted that HMDA and small business loans were given equal weight in determining this conclusion, given their comparable volumes. Given that the bank entered this assessment area in 2020, the geographic distribution performance is based solely on loans originated during that single year.

Home-Mortgage Lending

First Citizens' distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending 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 2015 ACS data, under 1% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 12% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (73% and 15%, respectively).

The following table presents First Citizens' geographic distribution of HMDA loans from 2020 in comparison to the applicable owner-occupied housing proxy and the aggregate lending levels in the assessment area. The table relies on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

First Citizens Community Bank Dover, DE Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2020	
		% First Citizens Lending	% Aggregate Lending
Low	0.7	11.1	0.5
Moderate	11.5	44.4	8.5
Middle	72.6	44.5	69.0
Upper	15.2	0.0	22.0
Unknown	0.0	0.0	0.0
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

First Citizens’ HMDA lending in low-income census tracts in 2020 was adequate. Of the nine HMDA loans originated by First Citizens in 2020, 11% of HMDA loans (one loan) was made in a low-income tract. This performance was well above aggregate lending, which was less than 1%, and above proxy of less than 1%. Categorized by loan product type, First Citizens’ single loan made in a low-income census tract was a multifamily loans (33%). Aggregate 2020 lending data show that less than 1% of home purchase loans, less than 1% of refinance loans, 1% of home improvement loans, 6% of multifamily loans, and less than 1% of loans with purpose “not applicable” were made in low-income tracts in 2020.

Lending in Moderate-Income Census Tracts

First Citizens’ lending in moderate-income census tracts in 2020 was good. In 2020, First Citizens’ HMDA lending in moderate-income tracts was 44% (four loans), which measured well above aggregate lending of 9% and the proxy of 12% of owner-occupied housing in moderate-income tracts. Categorized by product type, First Citizens made 33% of its home purchase loans (one loan), 50% of refinance loans (one loan), 100% of its home improvement loans (one loan), 33% of its multifamily loans (one loan), and no loans with purpose “not applicable” in moderate-income tracts in 2020. Aggregate lending data shows that 9% of home purchase loans, 8% of refinance loans, 10% of home improvement loans, 17% of multifamily loans, and 11% of loans with purpose “not applicable” were made in moderate-income tracts in the assessment area in 2020.

Small Businesses Lending

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

LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. According to 2020 Dun & Bradstreet business data Year, 8,069 businesses operated in the assessment area. Of these, 14% were located in low-income tracts, and 13% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (61% and 12%, respectively).

The table below presents First Citizens’ small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for 2020, the single year included in the analysis.

First Citizens Community Bank Dover, DE Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2020	
		% First Citizens Lending	% Aggregate Lending
Low	14.3	30.0	16.2
Moderate	13.2	10.0	12.7
Middle	60.9	40.0	59.3
Upper	11.6	20.0	11.5
Unknown	0.0	0.0	0.3
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

In 2020, the geographic distribution of the bank’s small business lending in low-income census tracts was good. First Citizens’ 10 small business loans, 30% (three loans) were originated in low-income census tracts. The bank’s lending performance level was above the aggregate small business lending level of 16%, and the proxy of businesses located in low-income tracts (14%).

Lending in Moderate-Income Census Tracts

In 2020, the geographic distribution of the bank’s small business lending in moderate-income census tracts was adequate. First Citizens originated 10% of its small business loans (one loan) in a moderate-income census tract. The bank’s lending level trailed both the 2020 aggregate small business lending level and proxy, both of which measured 13%.

Responsiveness to Credit Needs

First Citizens exhibits a poor record of serving the credit needs of low- and moderate-income individuals and areas and very small businesses, consistent with safe and sound banking practices. Though the bank is a recent entrant into the Dover, DE assessment area, the bank made no community development loans during the evaluation period, nor did it use innovative or flexible lending products in the assessment area. Finally, very little retail lending took place during its time in the market.

Innovative and/or Flexible Lending Practices

First Citizens makes no use of innovative and/or flexible lending practices in serving the Dover, DE assessment area credit needs. Though the bank offers alternative mortgage products and SBA loans within its assessment areas, none of these products were utilized in the Dover, DE assessment area during the evaluation period.

COMMUNITY DEVELOPMENT LENDING

First Citizens makes few, if any community development loans in the Dover, DE assessment area. During the period evaluated, which included the timeframe between the bank's April 17, 2020 expansion into this assessment area, through March 28, 2022, the bank made no community development loans in the Dover, DE assessment area.

INVESTMENT TEST

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

Performance under the investment test is assessed as high satisfactory.

Volume of Investment and Grant Activity

First Citizens has a significant level of qualified community development investments and grants, occasionally in a leadership position. During the evaluation period, from April 17, 2020 through March 28, 2022, qualified investments, grants, and donations for the Dover, DE assessment area totaled almost \$1.4 million. It is noteworthy that this is the first evaluation that includes community development investments in this assessment area, as the bank began its operations there in 2020. Of the bank's overall investments, nearly 22% were within the Dover, DE assessment area.

All three of the bank's qualified investments in the assessment area, totaling nearly \$1.37 million, supported affordable housing initiatives (100%) for low- and moderate-income individuals through a LIHTC with a CDFI that aided in the construction of six low- and mixed-income housing projects located in the Dover, DE assessment area and Chester, PA / New Castle, DE assessment area. Credit has been allocated based upon proportions of the projects located in each assessment area.

The bank also made four donations and grants totaling just under \$2 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount of donations, two donations totaling \$750 supported affordable housing (43%), and two donations totaling \$1 thousand were to organizations that provided community services to low- and moderate-income individuals (57%) in the assessment area.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

The following table presents the investment and donation activity for the Dover, DE assessment area.

First Citizens Community Bank Dover, DE Assessment Area Qualified Investments										
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	3	1,369	0	0	0	0	0	0	3	1,369
Donations	2	1	2	1	0	0	0	0	4	2
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	5	1,370	2	1	0	0	0	0	7	1,371

Responsiveness to Credit and Community Development Needs

First Citizens exhibits good responsiveness to credit and community development needs of the assessment area. As indicated previously, community contacts identified affordable housing (both rental and purchase) as the primary credit need within the Dover, DE assessment area. As noted above, nearly all of First Citizens’ investments and donations addressed this affordable housing need.

Community Development Initiatives

First Citizens makes occasional use of innovative and/or complex investments to support community development initiatives. It is noteworthy that in the Dover, DE assessment area, two of the bank’s qualified investments were LIHTCs through a local CDFI. These investments supported the construction of low-income housing, and carried more complexity than simple donations.

SERVICE TEST

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

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

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

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in its assessment areas.

During the review period, First Citizens operated one full-service branch in the Dover, DE assessment area (3% of the bank’s total branches). Using the 2015 ACS data, the single branch was located in an upper-income census tract. The following table details the locations of the bank’s branch with comparison to 2015 ACS population demographics

First Citizens Community Bank Dover, DE Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent of Population
Low	0	0.0	2,247	1.3
Moderate	0	0.0	26,008	15.3
Middle	0	0.0	116,919	69.0
Upper	1	100.0	24,335	14.4
Unknown Income	0	0.0	0	0.0
Totals	1	100.0	169,509	100.0

An ATM is not available at the branch. However, to supplement traditional banking services, First Citizens provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes remote deposit capture capabilities. Customers can pay bills, open accounts and apply for loan products via the bank’s website at <https://www.firstcitizensbank.com>.

Changes in Branch Locations

First Citizens’ record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. In April 2020, one branch in Dover, Kent County, Delaware was added through the bank’s acquisition of MidCoast Community Bank. As mentioned above, the branch is located in an upper-income census tract. No branches have been closed in the assessment area during the evaluation period.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned above, the single branch in the assessment area²⁰ does not include an ATM, nor does it have a drive-through facility. The branch offers standard hours Monday through Thursday, with extended hours on Friday. No Saturday hours are offered at the Dover branch.

²⁰The bank’s Dover branch is located at 584 N. DuPont Highway, Dover, DE 19901.

Bank Products

First Citizens offers a deposit product that provides greater access to banking services for low- and moderate-income customers. The bank's free checking account is a consumer account with no minimum daily balance requirement, and no monthly service fee. The account features unlimited check writing capabilities, free online, mobile and telephone banking, and a free debit card. A minimum \$50 deposit is required to open the account.

The bank also offers a low-cost business checking account for small businesses with limited transaction activity. The account offers 400 free deposit items, and up to 50 paid checks with no monthly service charge if the monthly minimum average balance of \$500 is maintained, or if deposits of at least \$10 thousand are maintained between all accounts open at the bank. If neither minimum balance is met, the account is subject to a \$10 monthly fee. Finally, First Citizens offers cash management services, such as merchant card services, which allows businesses to accept payments from all major credit and debit cards, thus eliminating long waits between receivables and collecting NSF checks.

Community Development Services

First Citizens provides an adequate level of community development services in this assessment area.

Though the bank has only been in the Dover, DE assessment area since 2020, two staff members served in various capacities on boards and committees of community development organizations, and provided technical assistance to community development organizations. More specifically, the bank CRA/Fair Lending Officer is a committee member for the Delaware Bankers Association's "Teach Children to Save Day" initiative, which organizes an annual financial literacy instruction event that targets low- and moderate-income students. Another bank employee served as an instructor for this initiative.

Additionally, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative." Home4Good is a flexible grant program that supports projects, programs and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB or Pittsburgh on their behalf.

CRA APPENDICES

CRA APPENDIX A: SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
Time Period Reviewed			
7/9/2019 – 3/28/2022			
Financial Institution		Products Reviewed	
First Citizens Community Bank		HMDA	
		Small Business	
Affiliates		Affiliate Relationship	
N/A		N/A	
		Products Reviewed	
		N/A	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Examination	Branches Visited²¹	Other Information
Northern Tier, PA Assessment Area (Non-MSA)	Full-Scope	N/A	
Lancaster, PA Assessment Area	Full-Scope	N/A	
Lebanon, PA Assessment Area	Limited-Scope	N/A	
State College, PA Assessment Area	Limited-Scope	N/A	
Chester, PA / New Castle, DE Assessment Area	Full-Scope	N/A	Because the bank added this assessment area in 2020, only 2020 lending data is included in the analysis.
Allegany, NY Assessment Area (Non-MSA)	Full-Scope	N/A	No geographic distribution analysis in low-income census tracts due to demographics of assessment area.
Dover, DE Assessment Area	Full-Scope	N/A	Because the bank added this assessment area in 2020, only 2020 lending data is included in the analysis.

²¹No branch visits were performed in accordance with the scoping process for this evaluation. The institution’s CRA Public File was reviewed electronically.

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

CRA APPENDIX B: SUMMARY OF STATE RATINGS

State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Commonwealth of Pennsylvania	-	-	-	Satisfactory
Northern Tier, PA (Non-MSA) Assessment Area	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Lancaster, PA Assessment Area	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Lebanon, PA Assessment Area	Exceeds	Exceeds	Consistent	Exceeds
State College, PA Assessment Area	Consistent	Below	Consistent	Consistent
Multistate Assessment Area	-	-	-	Satisfactory
Chester, PA / New Castle, DE Assessment Area	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of New York	-	-	-	Needs to Improve
Allegany, NY Assessment Area	Needs to Improve	Substantial Noncompliance	Low Satisfactory	Needs to Improve
State of Delaware	-	-	-	Needs to Improve
Dover, DE Assessment Area	Needs to Improve	High Satisfactory	Low Satisfactory	Needs to Improve

CRA APPENDIX C: GLOSSARY

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

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

Community development: All Agencies have adopted the following language.

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

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into male householder (a family with a male householder and no wife present) or female householder (a family with a female householder and no husband present).

Full-scope review: Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (NORTHERN TIER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	5	3.1%	344	1.5%
Moderate	0	0.0%	0	0.0%	26	16.4%	2,427	10.5%
Middle	150	94.3%	22,000	95.2%	42	26.5%	4,095	17.7%
Upper	9	5.7%	1,111	4.8%	74	46.5%	14,866	64.3%
Unknown	0	0.0%	0	0.0%	12	7.5%	1,379	6.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	159	100.0%	23,111	100.0%	159	100.0%	23,111	100.0%
Refinance								
Low	0	0.0%	0	0.0%	16	16.3%	638	7.1%
Moderate	0	0.0%	0	0.0%	17	17.3%	1,024	11.5%
Middle	94	95.9%	8,702	97.3%	31	31.7%	2,409	26.9%
Upper	4	4.1%	239	2.7%	32	32.7%	4,794	53.6%
Unknown	0	0.0%	0	0.0%	2	2.0%	76	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	98	100.0%	8,941	100.0%	98	100.0%	8,941	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	6	14.6%	118	6.5%
Moderate	0	0.0%	0	0.0%	6	14.6%	174	9.5%
Middle	41	100.0%	1,829	100.0%	12	29.4%	302	16.5%
Upper	0	0.0%	0	0.0%	16	39.0%	1,215	66.4%
Unknown	0	0.0%	0	0.0%	1	2.4%	20	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	41	100.0%	1,829	100.0%	41	100.0%	1,829	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	187	100.0%	1	100.0%	187	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	187	100.0%	1	100.0%	187	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	2	4.8%	71	4.2%
Moderate	0	0.0%	0	0.0%	10	23.8%	279	16.4%
Middle	40	95.2%	1,630	95.8%	14	33.3%	511	30.0%
Upper	2	4.8%	72	4.2%	16	38.1%	841	49.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	1,702	100.0%	42	100.0%	1,702	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	29	8.5%	1,171	3.3%
Moderate	0	0.0%	0	0.0%	59	17.3%	3,904	10.9%
Middle	326	95.6%	34,348	96.0%	100	29.3%	7,504	21.0%
Upper	15	4.4%	1,422	4.0%	138	40.5%	21,716	60.7%
Unknown	0	0.0%	0	0.0%	15	4.4%	1,475	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	341	100.0%	35,770	100.0%	341	100.0%	35,770	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (NORTHERN TIER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	0.7%	112	0.5%	6	4.2%	448	2.2%
Moderate	0	0.0%	0	0.0%	23	16.2%	1,759	8.5%
Middle	135	95.1%	19,125	92.7%	33	23.1%	4,754	23.1%
Upper	6	4.2%	1,397	6.8%	76	53.5%	13,168	63.8%
Unknown	0	0.0%	0	0.0%	4	2.8%	505	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	142	100.0%	20,634	100.0%	142	100.0%	20,634	100.0%
Refinance								
Low	0	0.0%	0	0.0%	11	10.6%	482	5.1%
Moderate	0	0.0%	0	0.0%	21	20.2%	1,394	14.7%
Middle	102	98.1%	9,072	95.7%	25	24.0%	2,144	22.6%
Upper	2	1.9%	410	4.3%	42	40.4%	4,830	50.9%
Unknown	0	0.0%	0	0.0%	5	4.8%	632	6.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	104	100.0%	9,482	100.0%	104	100.0%	9,482	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	2	7.7%	29	3.5%
Moderate	0	0.0%	0	0.0%	6	23.1%	141	16.8%
Middle	25	96.2%	824	98.4%	7	26.9%	180	21.5%
Upper	1	3.8%	13	1.6%	10	38.5%	482	57.6%
Unknown	0	0.0%	0	0.0%	1	3.8%	5	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	837	100.0%	26	100.0%	837	100.0%
Multi-Family								
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	12	100.0%	2,415	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	6	50.0%	687	28.4%
Unknown	0	0.0%	0	0.0%	6	50.0%	1,728	71.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	2,415	100.0%	12	100.0%	2,415	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	6	14.3%	123	7.4%
Moderate	0	0.0%	0	0.0%	12	28.6%	435	26.1%
Middle	40	95.2%	1,613	96.8%	8	19.0%	314	18.8%
Upper	2	4.8%	54	3.2%	14	33.3%	738	44.3%
Unknown	0	0.0%	0	0.0%	2	4.8%	57	3.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	1,667	100.0%	42	100.0%	1,667	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	0.3%	112	0.3%	25	7.7%	1,082	3.1%
Moderate	0	0.0%	0	0.0%	62	19.0%	3,729	10.6%
Middle	314	96.3%	33,049	94.4%	73	22.4%	7,392	21.1%
Upper	11	3.4%	1,874	5.3%	148	45.4%	19,905	56.8%
Unknown	0	0.0%	0	0.0%	18	5.5%	2,927	8.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	326	100.0%	35,035	100.0%	326	100.0%	35,035	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (NORTHERN TIER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	7	5.7%	537	3.0%
Moderate	0	0.0%	0	0.0%	19	15.4%	1,471	8.3%
Middle	113	91.9%	15,841	89.5%	32	26.1%	4,435	25.1%
Upper	10	8.1%	1,861	10.5%	56	45.5%	9,590	54.2%
Unknown	0	0.0%	0	0.0%	9	7.3%	1,669	9.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	123	100.0%	17,702	100.0%	123	100.0%	17,702	100.0%
Refinance								
Low	0	0.0%	0	0.0%	8	3.1%	416	1.1%
Moderate	0	0.0%	0	0.0%	28	10.7%	2,579	7.1%
Middle	253	96.9%	35,062	96.2%	67	25.7%	8,542	23.4%
Upper	8	3.1%	1,394	3.8%	148	56.7%	23,716	65.1%
Unknown	0	0.0%	0	0.0%	10	3.8%	1,203	3.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	261	100.0%	36,456	100.0%	261	100.0%	36,456	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	3.8%	6	0.5%
Moderate	0	0.0%	0	0.0%	4	15.4%	72	6.2%
Middle	24	92.3%	1,131	97.3%	7	26.9%	176	15.2%
Upper	2	7.7%	31	2.7%	13	50.1%	858	73.8%
Unknown	0	0.0%	0	0.0%	1	3.8%	50	4.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	1,162	100.0%	26	100.0%	1,162	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	16.7%	180	8.3%
Middle	6	100.0%	2,157	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	4	66.6%	1,517	70.3%
Unknown	0	0.0%	0	0.0%	1	16.7%	460	21.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	2,157	100.0%	6	100.0%	2,157	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	4	11.1%	78	5.6%
Moderate	0	0.0%	0	0.0%	9	25.0%	248	17.8%
Middle	33	91.7%	1,244	89.1%	7	19.5%	145	10.3%
Upper	3	8.3%	152	10.9%	16	44.4%	925	66.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	1,396	100.0%	36	100.0%	1,396	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	20	4.4%	1,037	1.8%
Moderate	0	0.0%	0	0.0%	61	13.5%	4,550	7.7%
Middle	429	94.9%	55,435	94.2%	113	25.1%	13,298	22.6%
Upper	23	5.1%	3,438	5.8%	237	52.4%	36,606	62.2%
Unknown	0	0.0%	0	0.0%	21	4.6%	3,382	5.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	452	100.0%	58,873	100.0%	452	100.0%	58,873	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	35.7%	637	24.4%	3	21.4%	450	17.2%
Middle	8	57.2%	1,766	67.7%	2	14.3%	383	14.7%
Upper	1	7.1%	206	7.9%	4	28.6%	1,109	42.5%
Unknown	0	0.0%	0	0.0%	5	35.7%	667	25.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	2,609	100.0%	14	100.0%	2,609	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	27.3%	181	8.4%	0	0.0%	0	0.0%
Middle	8	72.7%	1,962	91.6%	2	18.2%	381	17.8%
Upper	0	0.0%	0	0.0%	7	63.6%	1,449	67.6%
Unknown	0	0.0%	0	0.0%	2	18.2%	313	14.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	2,143	100.0%	11	100.0%	2,143	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	210	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	210	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	210	100.0%	2	100.0%	210	100.0%
Multi-Family								
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	3	100.0%	1,516	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	33.3%	296	19.5%
Unknown	0	0.0%	0	0.0%	2	66.7%	1,220	80.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	1,516	100.0%	3	100.0%	1,516	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income			By Borrower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	149	100.0%
Middle	1	100.0%	149	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	149	100.0%	1	100.0%	149	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	8	25.8%	818	12.3%	4	12.9%	599	9.0%
Middle	22	71.0%	5,603	84.6%	4	12.9%	764	11.6%
Upper	1	3.2%	206	3.1%	14	45.2%	3,064	46.2%
Unknown	0	0.0%	0	0.0%	9	29.0%	2,200	33.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	6,627	100.0%	31	100.0%	6,627	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	25.0%	249	9.1%
Moderate	2	16.7%	258	9.4%	4	33.3%	1,075	39.2%
Middle	10	83.3%	2,485	90.6%	2	16.7%	415	15.1%
Upper	0	0.0%	0	0.0%	2	16.7%	248	9.0%
Unknown	0	0.0%	0	0.0%	1	8.3%	756	27.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	2,743	100.0%	12	100.0%	2,743	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	33.3%	65	27.7%	1	33.3%	81	34.5%
Middle	2	66.7%	170	72.3%	1	33.4%	89	37.8%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	33.3%	65	27.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	235	100.0%	3	100.0%	235	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	1	33.3%	1,760	64.7%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	33.4%	348	12.8%	0	0.0%	0	0.0%
Upper	1	33.3%	612	22.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	2,720	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	2,720	100.0%	3	100.0%	2,720	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	185	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	185	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	185	100.0%	1	100.0%	185	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	5.3%	1,760	29.9%	3	15.8%	249	4.2%
Moderate	3	15.8%	323	5.5%	5	26.3%	1,156	19.6%
Middle	14	73.7%	3,188	54.2%	3	15.8%	504	8.6%
Upper	1	5.2%	612	10.4%	3	15.8%	433	7.4%
Unknown	0	0.0%	0	0.0%	5	26.3%	3,541	60.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	5,883	100.0%	19	100.0%	5,883	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	12.5%	209	8.0%	3	37.5%	611	23.3%
Middle	7	87.5%	2,414	92.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	25.0%	865	33.0%
Unknown	0	0.0%	0	0.0%	3	37.5%	1,147	43.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	2,623	100.0%	8	100.0%	2,623	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	30.8%	560	18.3%	1	7.7%	120	3.9%
Middle	8	61.5%	2,350	76.7%	3	23.0%	505	16.5%
Upper	1	7.7%	154	5.0%	4	30.8%	794	25.9%
Unknown	0	0.0%	0	0.0%	5	38.5%	1,645	53.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	3,064	100.0%	13	100.0%	3,064	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	1	50.0%	416	10.6%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	3,500	89.4%	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%	3,916	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	3,916	100.0%	2	100.0%	3,916	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	90	100.0%
Middle	1	100.0%	90	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	90	100.0%	1	100.0%	90	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	4.2%	416	4.3%	0	0.0%	0	0.0%
Moderate	5	20.8%	769	7.9%	5	20.8%	821	8.5%
Middle	17	70.8%	8,354	86.2%	3	12.5%	505	5.2%
Upper	1	4.2%	154	1.6%	6	25.0%	1,659	17.1%
Unknown	0	0.0%	0	0.0%	10	41.7%	6,708	69.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	9,693	100.0%	24	100.0%	9,693	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	8.3%	313	5.5%	5	13.9%	621	10.8%
Middle	25	69.5%	4,038	70.5%	8	22.2%	833	14.5%
Upper	8	22.2%	1,377	24.0%	19	52.8%	3,881	67.8%
Unknown	0	0.0%	0	0.0%	4	11.1%	393	6.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	5,728	100.0%	36	100.0%	5,728	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	5.9%	51	2.3%
Moderate	2	11.8%	76	3.5%	7	41.2%	739	33.6%
Middle	14	82.3%	2,037	92.6%	2	11.7%	210	9.6%
Upper	1	5.9%	85	3.9%	5	29.4%	970	44.1%
Unknown	0	0.0%	0	0.0%	2	11.8%	228	10.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	2,198	100.0%	17	100.0%	2,198	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	66.7%	43	55.1%
Middle	3	100.0%	78	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	33.3%	35	44.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	78	100.0%	3	100.0%	78	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	66.7%	3,805	88.9%	0	0.0%	0	0.0%
Middle	1	33.3%	475	11.1%	2	66.7%	680	15.9%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	33.3%	3,600	84.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	4,280	100.0%	3	100.0%	4,280	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	14.3%	14	6.7%
Moderate	1	14.3%	21	10.0%	3	42.9%	139	66.5%
Middle	4	57.1%	134	64.1%	3	42.8%	56	26.8%
Upper	2	28.6%	54	25.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	209	100.0%	7	100.0%	209	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	3.0%	65	0.5%
Moderate	8	12.1%	4,215	33.7%	17	25.8%	1,542	12.3%
Middle	47	71.2%	6,762	54.1%	15	22.7%	1,779	14.3%
Upper	11	16.7%	1,516	12.2%	25	37.9%	4,886	39.1%
Unknown	0	0.0%	0	0.0%	7	10.6%	4,221	33.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	12,493	100.0%	66	100.0%	12,493	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	4	13.8%	288	6.9%
Moderate	4	13.8%	347	8.3%	5	17.2%	695	16.6%
Middle	22	75.9%	2,930	70.1%	3	10.3%	318	7.6%
Upper	3	10.3%	905	21.6%	13	44.8%	2,138	51.1%
Unknown	0	0.0%	0	0.0%	4	13.9%	743	17.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	4,182	100.0%	29	100.0%	4,182	100.0%
Refinance								
Low	1	5.3%	40	1.7%	3	15.8%	190	8.3%
Moderate	0	0.0%	0	0.0%	2	10.5%	190	8.3%
Middle	16	84.2%	1,930	84.1%	3	15.8%	144	6.3%
Upper	2	10.5%	325	14.2%	7	36.8%	1,529	66.6%
Unknown	0	0.0%	0	0.0%	4	21.1%	242	10.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	2,295	100.0%	19	100.0%	2,295	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	1	20.0%	10	5.1%
Moderate	1	20.0%	18	9.2%	0	0.0%	0	0.0%
Middle	3	60.0%	134	68.7%	1	20.0%	90	46.2%
Upper	1	20.0%	43	22.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	60.0%	95	48.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	195	100.0%	5	100.0%	195	100.0%
Multi-Family								
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%	550	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	312	56.7%
Unknown	0	0.0%	0	0.0%	1	50.0%	238	43.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	550	100.0%	2	100.0%	550	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	25.0%	19	6.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	50.0%	239	75.6%	2	50.0%	77	24.4%
Upper	2	50.0%	77	24.4%	1	25.0%	220	69.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	316	100.0%	4	100.0%	316	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	1.7%	40	0.5%	9	15.3%	507	6.7%
Moderate	5	8.5%	365	4.8%	7	11.9%	885	11.7%
Middle	45	76.3%	5,783	76.8%	9	15.3%	629	8.3%
Upper	8	13.5%	1,350	17.9%	22	37.3%	4,199	55.7%
Unknown	0	0.0%	0	0.0%	12	20.2%	1,318	17.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	7,538	100.0%	59	100.0%	7,538	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	3	12.5%	259	6.5%	4	16.7%	418	10.5%
Moderate	2	8.3%	346	8.7%	4	16.7%	521	13.0%
Middle	14	58.3%	2,406	60.3%	5	20.8%	945	23.7%
Upper	5	20.9%	982	24.5%	10	41.7%	2,009	50.3%
Unknown	0	0.0%	0	0.0%	1	4.1%	100	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	3,993	100.0%	24	100.0%	3,993	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	3.0%	135	1.1%
Moderate	1	1.5%	237	1.9%	9	13.4%	1,141	9.2%
Middle	43	64.2%	7,192	58.0%	18	26.9%	2,825	22.7%
Upper	23	34.3%	4,977	40.1%	36	53.7%	7,923	63.9%
Unknown	0	0.0%	0	0.0%	2	3.0%	382	3.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	67	100.0%	12,406	100.0%	67	100.0%	12,406	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
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%	850	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	330	38.8%
Unknown	0	0.0%	0	0.0%	1	50.0%	520	61.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	850	100.0%	2	100.0%	850	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	3	3.2%	259	1.5%	6	6.5%	553	3.2%
Moderate	3	3.2%	583	3.4%	13	14.0%	1,662	9.6%
Middle	59	63.5%	10,448	60.6%	23	24.7%	3,770	21.9%
Upper	28	30.1%	5,959	34.5%	47	50.5%	10,262	59.5%
Unknown	0	0.0%	0	0.0%	4	4.3%	1,002	5.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	93	100.0%	17,249	100.0%	93	100.0%	17,249	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	4.5%	35	0.5%
Moderate	4	18.2%	1,306	18.6%	3	13.6%	573	8.2%
Middle	9	40.9%	3,430	48.9%	6	27.3%	1,630	23.2%
Upper	9	40.9%	2,278	32.5%	11	50.0%	4,362	62.2%
Unknown	0	0.0%	0	0.0%	1	4.6%	414	5.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	7,014	100.0%	22	100.0%	7,014	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	50.0%	1,921	76.7%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	1	25.0%	264	10.5%
Upper	2	50.0%	584	23.3%	2	50.0%	2,080	83.0%
Unknown	0	0.0%	0	0.0%	1	25.0%	161	6.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	2,505	100.0%	4	100.0%	2,505	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	940	100.0%	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%	1	100.0%	940	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	940	100.0%	1	100.0%	940	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	118	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	118	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	118	100.0%	1	100.0%	118	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	1	3.6%	35	0.3%
Moderate	7	25.0%	4,167	39.4%	3	10.7%	573	5.4%
Middle	10	35.7%	3,548	33.5%	7	25.0%	1,894	17.9%
Upper	11	39.3%	2,862	27.1%	15	53.6%	7,500	70.9%
Unknown	0	0.0%	0	0.0%	2	7.1%	575	5.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	10,577	100.0%	28	100.0%	10,577	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	4	18.2%	716	13.0%
Moderate	3	13.6%	520	9.5%	3	13.6%	323	5.9%
Middle	12	54.5%	2,298	41.9%	2	9.1%	419	7.6%
Upper	6	27.3%	2,279	41.5%	10	45.5%	3,566	65.0%
Unknown	1	4.6%	390	7.1%	3	13.6%	463	8.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	5,487	100.0%	22	100.0%	5,487	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	14.3%	801	8.8%	0	0.0%	0	0.0%
Middle	6	42.9%	2,522	27.8%	0	0.0%	0	0.0%
Upper	4	28.6%	1,058	11.7%	7	50.0%	2,039	22.5%
Unknown	2	14.3%	4,690	51.7%	7	50.0%	7,032	77.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	9,071	100.0%	14	100.0%	9,071	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	354	8.2%	0	0.0%	0	0.0%
Middle	2	50.0%	2,755	63.6%	0	0.0%	0	0.0%
Upper	1	25.0%	1,220	28.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	4,329	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	4,329	100.0%	4	100.0%	4,329	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	4	10.0%	716	3.8%
Moderate	6	15.0%	1,675	8.9%	3	7.5%	323	1.7%
Middle	20	50.0%	7,575	40.1%	2	5.0%	419	2.2%
Upper	11	27.5%	4,557	24.1%	17	42.5%	5,605	29.7%
Unknown	3	7.5%	5,080	26.9%	14	35.0%	11,824	62.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	40	100.0%	18,887	100.0%	40	100.0%	18,887	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	4.3%	155	2.0%
Moderate	2	8.7%	918	11.8%	1	4.3%	372	4.8%
Middle	6	26.1%	1,773	22.8%	4	17.4%	1,109	14.3%
Upper	14	60.9%	4,631	59.6%	15	65.2%	5,792	74.5%
Unknown	1	4.3%	452	5.8%	2	8.8%	346	4.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	7,774	100.0%	23	100.0%	7,774	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	10.6%	1,134	8.9%	7	14.9%	1,488	11.6%
Middle	22	46.8%	5,661	44.2%	11	23.4%	2,299	18.0%
Upper	20	42.6%	6,001	46.9%	28	59.6%	8,597	67.2%
Unknown	0	0.0%	0	0.0%	1	2.1%	412	3.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	47	100.0%	12,796	100.0%	47	100.0%	12,796	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
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	1	100.0%	338	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	338	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	338	100.0%	1	100.0%	338	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	400	90.9%	0	0.0%	0	0.0%
Upper	1	50.0%	40	9.1%	2	100.0%	440	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	440	100.0%	2	100.0%	440	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	1	1.4%	155	0.7%
Moderate	7	9.6%	2,052	9.6%	8	11.0%	1,860	8.7%
Middle	29	39.7%	7,834	36.7%	15	20.5%	3,408	16.0%
Upper	36	49.3%	11,010	51.6%	45	61.6%	14,829	69.5%
Unknown	1	1.4%	452	2.1%	4	5.5%	1,096	5.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	21,348	100.0%	73	100.0%	21,348	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (CHESTER, PA / NEW CASTLE, DE ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	25.0%	489	15.5%	0	0.0%	0	0.0%
Middle	5	41.7%	1,173	37.3%	3	25.0%	928	29.5%
Upper	4	33.3%	1,483	47.2%	3	25.0%	735	23.4%
Unknown	0	0.0%	0	0.0%	6	50.0%	1,482	47.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	3,145	100.0%	12	100.0%	3,145	100.0%
Refinance								
Low	1	5.9%	77	1.9%	0	0.0%	0	0.0%
Moderate	2	11.8%	495	12.0%	2	11.8%	221	5.4%
Middle	7	41.2%	1,350	32.8%	4	23.5%	974	23.6%
Upper	7	41.1%	2,200	53.3%	9	52.9%	2,499	60.6%
Unknown	0	0.0%	0	0.0%	2	11.8%	428	10.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	4,122	100.0%	17	100.0%	4,122	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	100.0%	327	100.0%	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%	1	50.0%	150	45.9%
Unknown	0	0.0%	0	0.0%	1	50.0%	177	54.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	327	100.0%	2	100.0%	327	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	550	19.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	2,340	81.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	2,890	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	2,890	100.0%	2	100.0%	2,890	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (CHESTER, PA / NEW CASTLE, DE ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	3.0%	77	0.7%	0	0.0%	0	0.0%
Moderate	8	24.2%	1,861	17.8%	2	6.1%	221	2.1%
Middle	12	36.4%	2,523	24.1%	7	21.2%	1,902	18.1%
Upper	12	36.4%	6,023	57.4%	13	39.4%	3,384	32.3%
Unknown	0	0.0%	0	0.0%	11	33.3%	4,977	47.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	33	100.0%	10,484	100.0%	33	100.0%	10,484	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 HMDA LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	20.0%	86	14.2%
Moderate	1	10.0%	81	13.4%	2	20.0%	130	21.5%
Middle	9	90.0%	523	86.6%	1	10.0%	81	13.4%
Upper	0	0.0%	0	0.0%	5	50.0%	307	50.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	604	100.0%	10	100.0%	604	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	50.0%	100	24.1%
Middle	6	100.0%	415	100.0%	2	33.3%	115	27.7%
Upper	0	0.0%	0	0.0%	1	16.7%	200	48.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	415	100.0%	6	100.0%	415	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	15	8.5%	0	0.0%	0	0.0%
Middle	4	80.0%	162	91.5%	1	20.0%	40	22.6%
Upper	0	0.0%	0	0.0%	4	80.0%	137	77.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	177	100.0%	5	100.0%	177	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

CONTINUED- 2018 HMDA LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	16.7%	14	4.2%
Moderate	0	0.0%	0	0.0%	1	16.7%	29	8.7%
Middle	6	100.0%	335	100.0%	3	50.0%	72	21.5%
Upper	0	0.0%	0	0.0%	1	16.6%	220	65.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	335	100.0%	6	100.0%	335	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	3	11.1%	100	6.5%
Moderate	2	7.4%	96	6.3%	6	22.2%	259	16.9%
Middle	25	92.6%	1,435	93.7%	7	25.9%	308	20.1%
Upper	0	0.0%	0	0.0%	11	40.8%	864	56.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	1,531	100.0%	27	100.0%	1,531	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2019 HMDA LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	28.6%	126	26.0%
Moderate	1	14.3%	171	35.3%	0	0.0%	0	0.0%
Middle	6	85.7%	313	64.7%	2	28.6%	60	12.4%
Upper	0	0.0%	0	0.0%	3	42.8%	298	61.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	484	100.0%	7	100.0%	484	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	11.1%	50	13.0%
Moderate	0	0.0%	0	0.0%	1	11.1%	26	6.8%
Middle	9	100.0%	385	100.0%	3	33.3%	141	36.6%
Upper	0	0.0%	0	0.0%	4	44.6%	168	43.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	385	100.0%	9	100.0%	385	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	14	100.0%
Middle	1	100.0%	14	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	14	100.0%	1	100.0%	14	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	33	100.0%	1	50.0%	13	39.4%
Upper	0	0.0%	0	0.0%	1	50.0%	20	60.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	33	100.0%	2	100.0%	33	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	3	15.8%	176	19.2%
Moderate	1	5.3%	171	18.7%	2	10.5%	40	4.4%
Middle	18	94.7%	745	81.3%	6	31.6%	214	23.4%
Upper	0	0.0%	0	0.0%	8	42.1%	486	53.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	916	100.0%	19	100.0%	916	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	12.5%	60	8.2%
Middle	8	100.0%	730	100.0%	3	37.5%	162	22.2%
Upper	0	0.0%	0	0.0%	4	50.0%	508	69.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	730	100.0%	8	100.0%	730	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	15.4%	172	19.3%
Middle	13	100.0%	890	100.0%	5	38.5%	263	29.6%
Upper	0	0.0%	0	0.0%	6	46.1%	455	51.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	890	100.0%	13	100.0%	890	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	46	75.4%
Middle	2	100.0%	61	100.0%	1	50.0%	15	24.6%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	61	100.0%	2	100.0%	61	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	17	50.0%
Middle	2	100.0%	34	100.0%	1	50.0%	17	50.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	34	100.0%	2	100.0%	34	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	5	20.0%	295	17.2%
Middle	25	100.0%	1,715	100.0%	10	40.0%	457	26.6%
Upper	0	0.0%	0	0.0%	10	40.0%	963	56.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	1,715	100.0%	25	100.0%	1,715	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 HMDA LOAN DISTRIBUTION TABLE (DOVER, DE ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	33.3%	216	51.2%	0	0.0%	0	0.0%
Middle	2	66.7%	206	48.8%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	66.7%	206	48.8%
Unknown	0	0.0%	0	0.0%	1	33.3%	216	51.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	422	100.0%	3	100.0%	422	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	546	68.1%	0	0.0%	0	0.0%
Middle	1	50.0%	256	31.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	256	31.9%
Unknown	0	0.0%	0	0.0%	1	50.0%	546	68.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	802	100.0%	2	100.0%	802	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	60	100.0%	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%	1	100.0%	60	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	60	100.0%	1	100.0%	60	100.0%
Multi-Family								
Low	1	33.3%	750	25.2%	0	0.0%	0	0.0%
Moderate	1	33.3%	1,405	47.2%	0	0.0%	0	0.0%
Middle	1	33.4%	821	27.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	2,976	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	2,976	100.0%	3	100.0%	2,976	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (DOVER, DE ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	1	11.1%	750	17.6%	0	0.0%	0	0.0%
Moderate	4	44.4%	2,227	52.3%	0	0.0%	0	0.0%
Middle	4	44.4%	1,283	30.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	3	33.3%	462	10.8%
Unknown	0	0.0%	0	0.0%	6	66.7%	3,798	89.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	4,260	100.0%	9	100.0%	4,260	100.0%

CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (NORTHERN TIER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	88	93.6%	13,601	96.8%	67	100.0%	3,238	100.0%
Upper	6	6.4%	456	3.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	94	100.0%	14,057	100.0%	67	100.0%	3,238	100.0%
By Revenue								
Total \$1 Million or Less	54	57.4%	3,955	28.1%	64	95.5%	2,998	92.6%
Over \$1 Million	40	42.6%	10,102	71.9%	3	4.5%	240	7.4%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	94	100.0%	14,057	100.0%	67	100.0%	3,238	100.0%
By Loan Size								
\$100,000 or less	62	66.0%	3,001	21.3%	63	94.0%	2,323	71.7%
\$100,001 - \$250,000	15	16.0%	2,574	18.3%	2	3.0%	308	9.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	17	18.0%	8,482	60.4%	2	3.0%	607	18.8%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	94	100.0%	14,057	100.0%	67	100.0%	3,238	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	44	81.5%	1,960	49.6%	60	93.8%	2,083	69.5%
\$100,001 - \$250,000	7	13.0%	1,110	28.1%	2	3.1%	308	10.3%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	5.5%	885	22.3%	2	3.1%	607	20.2%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	54	100.0%	3,955	100.0%	64	100.0%	2,998	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	120	95.2%	14,017	93.5%	84	97.7%	7,776	98.7%
Upper	6	4.8%	975	6.5%	2	2.3%	100	1.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	126	100.0%	14,992	100.0%	86	100.0%	7,876	100.0%
By Revenue								
Total \$1 Million or Less	86	68.3%	5,850	39.0%	70	81.4%	4,921	62.5%
Over \$1 Million	40	31.7%	9,142	61.0%	16	18.6%	2,955	37.5%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	126	100.0%	14,992	100.0%	86	100.0%	7,876	100.0%
By Loan Size								
\$100,000 or less	83	65.9%	3,189	21.3%	63	73.3%	2,333	29.6%
\$100,001 - \$250,000	27	21.4%	4,280	28.5%	14	16.3%	2,315	29.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	16	12.7%	7,523	50.2%	9	10.4%	3,228	41.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	126	100.0%	14,992	100.0%	86	100.0%	7,876	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	67	77.9%	2,545	43.5%	58	82.9%	2,012	40.9%
\$100,001 - \$250,000	17	19.8%	2,635	45.0%	8	11.4%	1,291	26.2%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	2.3%	670	11.5%	4	5.7%	1,618	32.9%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	86	100.0%	5,850	100.0%	70	100.0%	4,921	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	1	0.3%	49	0.1%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	342	94.7%	32,470	95.4%	69	100.0%	6,118	100.0%
Upper	18	5.0%	1,505	4.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	361	100.0%	34,024	100.0%	69	100.0%	6,118	100.0%
By Revenue								
Total \$1 Million or Less	56	15.5%	5,149	15.1%	40	58.0%	3,231	52.8%
Over \$1 Million	47	13.0%	9,570	28.1%	11	15.9%	2,115	34.6%
Not Known	258	71.5%	19,305	56.8%	18	26.1%	772	12.6%
Total	361	100.0%	34,024	100.0%	69	100.0%	6,118	100.0%
By Loan Size								
\$100,000 or less	277	76.7%	9,100	26.7%	49	71.0%	1,971	32.2%
\$100,001 - \$250,000	48	13.3%	7,759	22.8%	15	21.7%	2,431	39.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	36	10.0%	17,165	50.5%	5	7.3%	1,716	28.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	361	100.0%	34,024	100.0%	69	100.0%	6,118	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	39	69.6%	1,665	32.3%	30	75.0%	1,396	43.2%
\$100,001 - \$250,000	13	23.2%	2,214	43.0%	9	22.5%	1,577	48.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	7.2%	1,270	24.7%	1	2.5%	258	8.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	56	100.0%	5,149	100.0%	40	100.0%	3,231	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	20.0%	256	25.0%	0	0.0%	0	0.0%
Middle	7	70.0%	469	45.8%	44	95.7%	7,128	93.1%
Upper	1	10.0%	300	29.2%	2	4.3%	525	6.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,025	100.0%	46	100.0%	7,653	100.0%
By Revenue								
Total \$1 Million or Less	7	70.0%	579	56.5%	41	89.1%	5,939	77.6%
Over \$1 Million	3	30.0%	446	43.5%	5	10.9%	1,714	22.4%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,025	100.0%	46	100.0%	7,653	100.0%
By Loan Size								
\$100,000 or less	6	60.0%	205	20.0%	25	54.3%	1,343	17.5%
\$100,001 - \$250,000	3	30.0%	520	50.7%	9	19.6%	1,427	18.6%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	10.0%	300	29.3%	12	26.1%	4,883	63.9%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,025	100.0%	46	100.0%	7,653	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	5	71.4%	189	32.6%	25	61.0%	1,343	22.6%
\$100,001 - \$250,000	2	28.6%	390	67.4%	7	17.0%	1,076	18.1%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	9	22.0%	3,520	59.3%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	579	100.0%	41	100.0%	5,939	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	8.3%	120	5.2%	0	0.0%	0	0.0%
Middle	11	91.7%	2,166	94.8%	47	95.9%	5,522	95.2%
Upper	0	0.0%	0	0.0%	2	4.1%	277	4.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	2,286	100.0%	49	100.0%	5,799	100.0%
By Revenue								
Total \$1 Million or Less	7	58.3%	1,034	45.2%	41	83.7%	4,186	72.2%
Over \$1 Million	5	41.7%	1,252	54.8%	8	16.3%	1,613	27.8%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	2,286	100.0%	49	100.0%	5,799	100.0%
By Loan Size								
\$100,000 or less	6	50.0%	354	15.5%	29	59.2%	1,377	23.7%
\$100,001 - \$250,000	3	25.0%	432	18.9%	16	32.7%	2,823	48.7%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	25.0%	1,500	65.6%	4	8.1%	1,599	27.6%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	2,286	100.0%	49	100.0%	5,799	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	5	71.4%	304	29.4%	27	65.9%	1,237	29.6%
\$100,001 - \$250,000	1	14.3%	130	12.6%	11	26.8%	1,733	41.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	14.3%	600	58.0%	3	7.3%	1,216	29.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	1,034	100.0%	41	100.0%	4,186	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	1	3.3%	500	8.8%	0	0.0%	0	0.0%
Moderate	3	10.0%	214	3.8%	0	0.0%	0	0.0%
Middle	24	80.0%	4,734	83.1%	33	97.1%	3,528	92.2%
Upper	2	6.7%	251	4.3%	1	2.9%	300	7.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	5,699	100.0%	34	100.0%	3,828	100.0%
By Revenue								
Total \$1 Million or Less	9	30.0%	2,637	46.3%	24	70.6%	2,160	56.4%
Over \$1 Million	6	20.0%	1,635	28.7%	5	14.7%	1,391	36.3%
Not Known	15	50.0%	1,427	25.0%	5	14.7%	277	7.3%
Total	30	100.0%	5,699	100.0%	34	100.0%	3,828	100.0%
By Loan Size								
\$100,000 or less	17	56.7%	718	12.6%	19	55.9%	771	20.1%
\$100,001 - \$250,000	6	20.0%	1,006	17.7%	11	32.4%	1,706	44.6%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	23.3%	3,975	69.7%	4	11.7%	1,351	35.3%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	5,699	100.0%	34	100.0%	3,828	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	4	44.4%	207	7.8%	15	62.5%	626	29.0%
\$100,001 - \$250,000	1	11.1%	161	6.2%	8	33.3%	1,254	58.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	44.4%	2,269	86.0%	1	4.2%	280	13.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	2,637	100.0%	24	100.0%	2,160	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LEBANON, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	7	14.9%	1,478	14.9%	0	0.0%	0	0.0%
Middle	31	66.0%	5,677	57.1%	54	87.1%	9,064	91.1%
Upper	9	19.1%	2,782	28.0%	8	12.9%	890	8.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	47	100.0%	9,937	100.0%	62	100.0%	9,954	100.0%
By Revenue								
Total \$1 Million or Less	19	40.4%	2,844	28.6%	52	83.9%	7,592	76.3%
Over \$1 Million	28	59.6%	7,093	71.4%	10	16.1%	2,362	23.7%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	47	100.0%	9,937	100.0%	62	100.0%	9,954	100.0%
By Loan Size								
\$100,000 or less	24	51.1%	1,304	13.1%	35	56.5%	1,724	17.3%
\$100,001 - \$250,000	12	25.5%	2,005	20.2%	11	17.7%	2,025	20.3%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	11	23.4%	6,628	66.7%	16	25.8%	6,205	62.4%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	47	100.0%	9,937	100.0%	62	100.0%	9,954	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	11	57.9%	486	17.1%	32	61.5%	1,547	20.4%
\$100,001 - \$250,000	5	26.3%	718	25.2%	7	13.5%	1,090	14.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	15.8%	1,640	57.7%	13	25.0%	4,955	65.2%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	2,844	100.0%	52	100.0%	7,592	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	5.3%	358	5.7%	0	0.0%	0	0.0%
Middle	34	89.5%	5,771	91.9%	44	81.5%	5,758	86.5%
Upper	2	5.2%	153	2.4%	10	18.5%	900	13.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	6,282	100.0%	54	100.0%	6,658	100.0%
By Revenue								
Total \$1 Million or Less	26	68.4%	4,868	77.5%	52	96.3%	6,413	96.3%
Over \$1 Million	12	31.6%	1,414	22.5%	2	3.7%	245	3.7%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	6,282	100.0%	54	100.0%	6,658	100.0%
By Loan Size								
\$100,000 or less	23	60.5%	946	15.1%	32	59.3%	1,661	24.9%
\$100,001 - \$250,000	8	21.1%	1,547	24.6%	14	25.9%	2,297	34.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	18.4%	3,789	60.3%	8	14.8%	2,700	40.6%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	6,282	100.0%	54	100.0%	6,658	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	16	61.5%	674	13.8%	31	59.6%	1,596	24.9%
\$100,001 - \$250,000	4	15.4%	722	14.8%	13	25.0%	2,117	33.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	23.1%	3,472	71.4%	8	15.4%	2,700	42.1%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	4,868	100.0%	52	100.0%	6,413	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	2	1.4%	42	0.3%	0	0.0%	0	0.0%
Moderate	18	12.2%	2,497	20.2%	0	0.0%	0	0.0%
Middle	96	64.9%	5,581	45.2%	51	79.7%	6,363	85.4%
Upper	32	21.5%	4,230	34.3%	13	20.3%	1,091	14.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	148	100.0%	12,350	100.0%	64	100.0%	7,454	100.0%
By Revenue								
Total \$1 Million or Less	9	6.1%	645	5.2%	53	82.8%	6,033	80.9%
Over \$1 Million	9	6.1%	1,102	8.9%	4	6.3%	927	12.4%
Not Known	130	87.8%	10,603	85.9%	7	10.9%	494	6.7%
Total	148	100.0%	12,350	100.0%	64	100.0%	7,454	100.0%
By Loan Size								
\$100,000 or less	115	77.7%	4,495	36.4%	39	60.9%	1,699	22.8%
\$100,001 - \$250,000	25	16.9%	3,903	31.6%	16	25.0%	2,794	37.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	5.4%	3,952	32.0%	9	14.1%	2,961	39.7%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	148	100.0%	12,350	100.0%	64	100.0%	7,454	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	8	88.9%	395	61.2%	33	62.3%	1,451	24.1%
\$100,001 - \$250,000	1	11.1%	250	38.8%	14	26.4%	2,478	41.1%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	6	11.3%	2,104	34.8%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	645	100.0%	53	100.0%	6,033	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (STATE COLLEGE, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	20	4.0%	2	16.7%	175	14.1%
Middle	3	60.0%	405	81.0%	10	83.3%	1,068	85.9%
Upper	1	20.0%	75	15.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	500	100.0%	12	100.0%	1,243	100.0%
By Revenue								
Total \$1 Million or Less	4	80.0%	480	96.0%	10	83.3%	1,043	83.9%
Over \$1 Million	1	20.0%	20	4.0%	2	16.7%	200	16.1%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	500	100.0%	12	100.0%	1,243	100.0%
By Loan Size								
\$100,000 or less	3	60.0%	170	34.0%	8	66.7%	473	38.1%
\$100,001 - \$250,000	2	40.0%	330	66.0%	3	25.0%	470	37.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	1	8.3%	300	24.1%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	500	100.0%	12	100.0%	1,243	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	2	50.0%	150	31.3%	7	70.0%	423	40.6%
\$100,001 - \$250,000	2	50.0%	330	68.7%	2	20.0%	320	30.7%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	1	10.0%	300	28.7%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	480	100.0%	10	100.0%	1,043	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	20.0%	105	23.9%
Middle	0	0.0%	0	0.0%	4	80.0%	335	76.1%
Upper	3	100.0%	573	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	573	100.0%	5	100.0%	440	100.0%
	By Revenue							
Total \$1 Million or Less	2	66.7%	475	82.9%	3	60.0%	290	65.9%
Over \$1 Million	1	33.3%	98	17.1%	2	40.0%	150	34.1%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	573	100.0%	5	100.0%	440	100.0%
	By Loan Size							
\$100,000 or less	2	66.7%	198	34.6%	3	60.0%	175	39.8%
\$100,001 - \$250,000	0	0.0%	0	0.0%	2	40.0%	265	60.2%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	33.3%	375	65.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	573	100.0%	5	100.0%	440	100.0%
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	1	50.0%	100	21.1%	1	33.3%	25	8.6%
\$100,001 - \$250,000	0	0.0%	0	0.0%	2	66.7%	265	91.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	50.0%	375	78.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	475	100.0%	3	100.0%	290	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

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

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	10.7%	1,643	42.9%	1	11.1%	171	15.3%
Middle	7	25.0%	262	6.8%	8	88.9%	948	84.7%
Upper	7	25.0%	1,017	26.6%	0	0.0%	0	0.0%
Unknown	11	39.3%	906	23.7%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,828	100.0%	9	100.0%	1,119	100.0%
By Revenue								
Total \$1 Million or Less	0	0.0%	0	0.0%	8	88.9%	1,044	93.3%
Over \$1 Million	0	0.0%	0	0.0%	1	11.1%	75	6.7%
Not Known	28	100.0%	3,828	100.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,828	100.0%	9	100.0%	1,119	100.0%
By Loan Size								
\$100,000 or less	20	71.4%	705	18.4%	6	66.7%	220	19.7%
\$100,001 - \$250,000	5	17.9%	801	20.9%	1	11.1%	171	15.3%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	10.7%	2,322	60.7%	2	22.2%	728	65.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,828	100.0%	9	100.0%	1,119	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	0	0.0%	0	0.0%	5	62.5%	145	13.9%
\$100,001 - \$250,000	0	0.0%	0	0.0%	1	12.5%	171	16.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	2	25.0%	728	69.7%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	8	100.0%	1,044	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CHESTER, PA / NEW CASTLE, DE ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	1	7.7%	70	4.1%
Moderate	16	34.8%	4,254	40.0%	3	23.1%	722	42.4%
Middle	17	37.0%	2,723	25.6%	9	69.2%	912	53.5%
Upper	13	28.2%	3,671	34.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	10,648	100.0%	13	100.0%	1,704	100.0%
By Revenue								
Total \$1 Million or Less	10	21.7%	5,096	47.9%	8	61.5%	553	32.5%
Over \$1 Million	7	15.3%	2,455	23.1%	1	7.7%	500	29.3%
Not Known	29	63.0%	3,097	29.0%	4	30.8%	651	38.2%
Total	46	100.0%	10,648	100.0%	13	100.0%	1,704	100.0%
By Loan Size								
\$100,000 or less	20	43.5%	832	7.8%	8	61.5%	365	21.4%
\$100,001 - \$250,000	14	30.4%	2,625	24.7%	3	23.1%	571	33.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	12	26.1%	7,191	67.5%	2	15.4%	768	45.1%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	10,648	100.0%	13	100.0%	1,704	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	1	10.0%	46	0.9%	7	87.5%	285	51.5%
\$100,001 - \$250,000	1	10.0%	150	2.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	80.0%	4,900	96.2%	1	12.5%	268	48.5%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	5,096	100.0%	8	100.0%	553	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	8	100.0%	846	100.0%	3	100.0%	70	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	846	100.0%	3	100.0%	70	100.0%
By Revenue								
Total \$1 Million or Less	3	37.5%	416	49.2%	3	100.0%	70	100.0%
Over \$1 Million	5	62.5%	430	50.8%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	846	100.0%	3	100.0%	70	100.0%
By Loan Size								
\$100,000 or less	5	62.5%	296	35.0%	3	100.0%	70	100.0%
\$100,001 - \$250,000	2	25.0%	270	31.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	12.5%	280	33.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	846	100.0%	3	100.0%	70	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	2	66.7%	136	32.7%	3	100.0%	70	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	33.3%	280	67.3%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	416	100.0%	3	100.0%	70	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	11	100.0%	672	100.0%	5	100.0%	148	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	672	100.0%	5	100.0%	148	100.0%
By Revenue								
Total \$1 Million or Less	4	36.4%	122	18.2%	5	100.0%	148	100.0%
Over \$1 Million	7	63.6%	550	81.8%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	672	100.0%	5	100.0%	148	100.0%
By Loan Size								
\$100,000 or less	10	90.9%	417	62.1%	5	100.0%	148	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	9.1%	255	37.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	672	100.0%	5	100.0%	148	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	4	100.0%	122	100.0%	5	100.0%	148	100.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	122	100.0%	5	100.0%	148	100.0%

**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLEGANY, NY ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	4.0%	17	0.8%	0	0.0%	0	0.0%
Middle	24	96.0%	2,088	99.2%	5	100.0%	405	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	2,105	100.0%	5	100.0%	405	100.0%
By Revenue								
Total \$1 Million or Less	4	16.0%	248	11.8%	4	80.0%	399	98.5%
Over \$1 Million	4	16.0%	605	28.7%	0	0.0%	0	0.0%
Not Known	17	68.0%	1,252	59.5%	1	20.0%	6	1.5%
Total	25	100.0%	2,105	100.0%	5	100.0%	405	100.0%
By Loan Size								
\$100,000 or less	20	80.0%	673	32.0%	4	80.0%	100	24.7%
\$100,001 - \$250,000	2	8.0%	220	10.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	12.0%	1,212	57.6%	1	20.0%	305	75.3%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	2,105	100.0%	5	100.0%	405	100.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	3	75.0%	132	53.2%	3	75.0%	94	23.6%
\$100,001 - \$250,000	1	25.0%	116	46.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	1	25.0%	305	76.4%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	248	100.0%	4	100.0%	399	100.0%

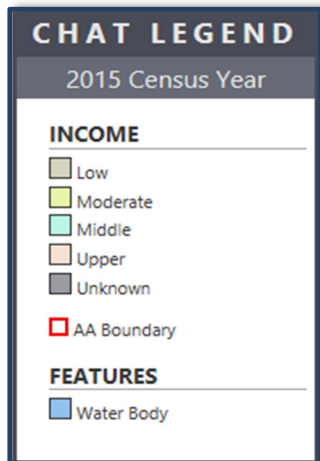
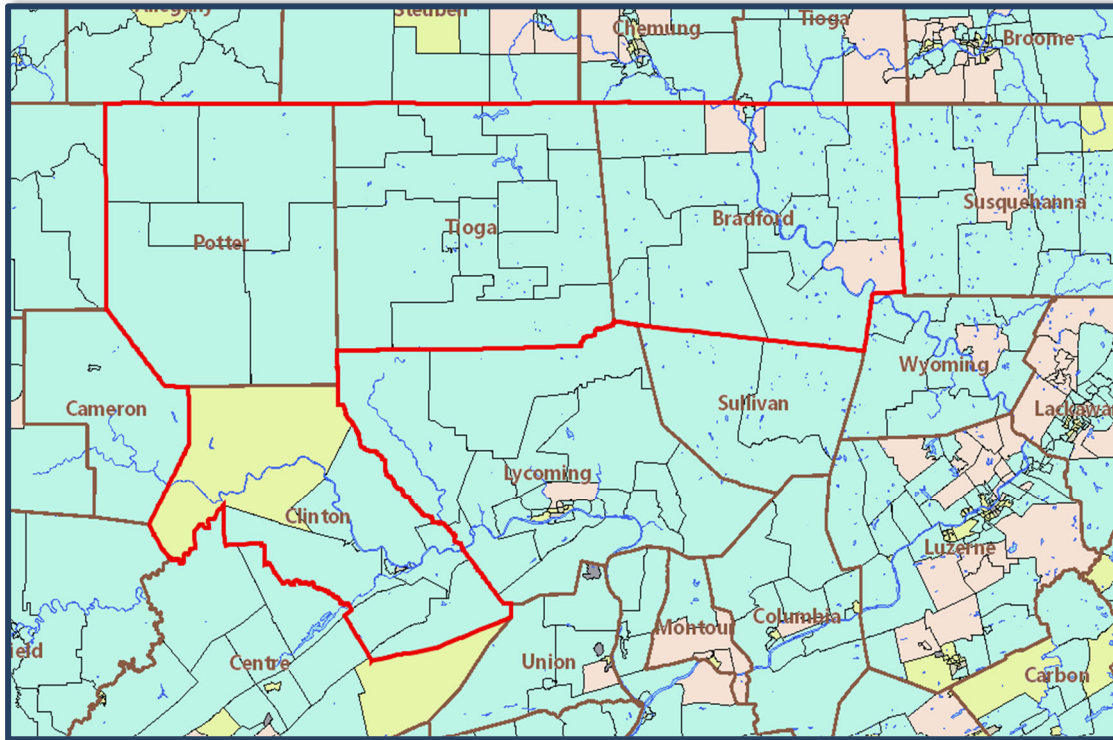
**LARGE INSTITUTION PERFORMANCE EVALUATION
MARCH 2022**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (DOVER, DE ASSESSMENT AREA)

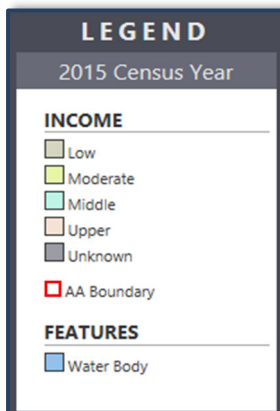
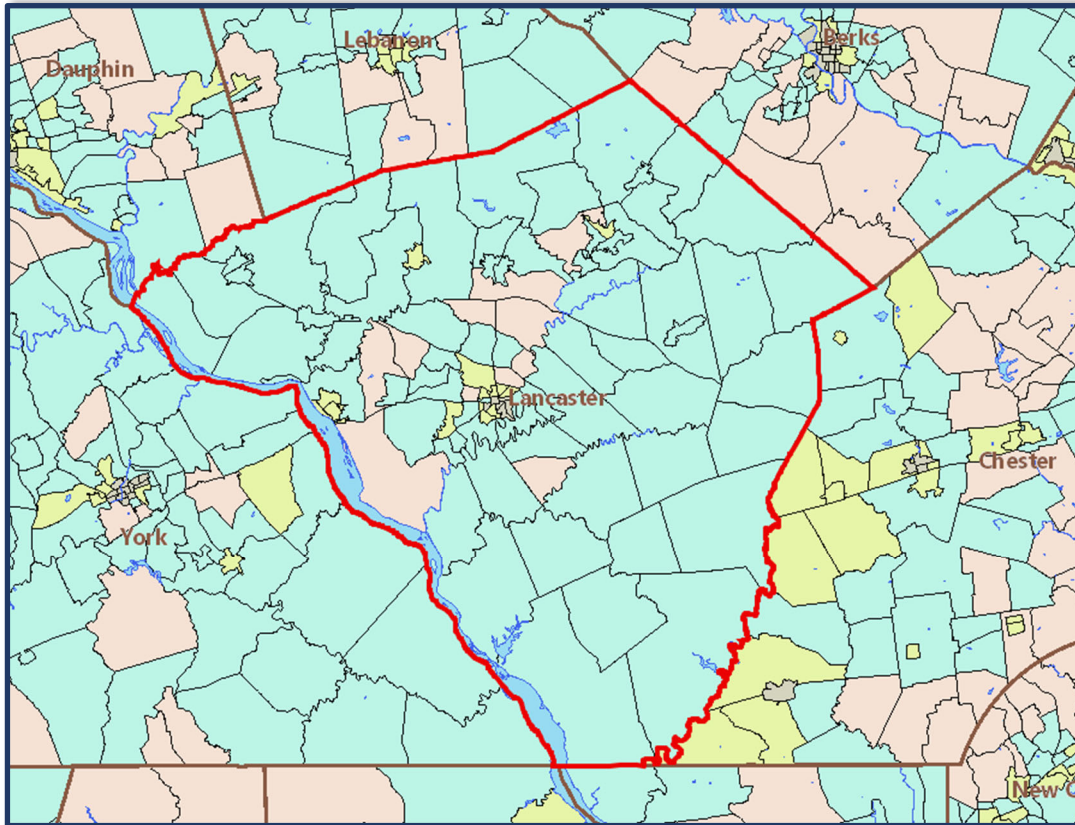
Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
By Tract Income								
Low	3	30.0%	280	22.4%	0	0.0%	0	0.0%
Moderate	1	10.0%	8	0.6%	0	0.0%	0	0.0%
Middle	4	40.0%	120	9.6%	0	0.0%	0	0.0%
Upper	2	20.0%	840	67.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,248	100.0%	0	0.0%	0	0.0%
By Revenue								
Total \$1 Million or Less	1	10.0%	340	27.2%	0	0.0%	0	0.0%
Over \$1 Million	1	10.0%	500	40.1%	0	0.0%	0	0.0%
Not Known	8	80.0%	408	32.7%	0	0.0%	0	0.0%
Total	10	100.0%	1,248	100.0%	0	0.0%	0	0.0%
By Loan Size								
\$100,000 or less	7	70.0%	238	19.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	10.0%	170	13.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	20.0%	840	67.3%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,248	100.0%	0	0.0%	0	0.0%
By Loan Size and Revenue \$1 Million or Less								
\$100,000 or less	0	0.0%	0	0.0%	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)	1	100.0%	340	100.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	340	100.0%	0	0.0%	0	0.0%

CRA APPENDIX F: ASSESSMENT AREA MAPS

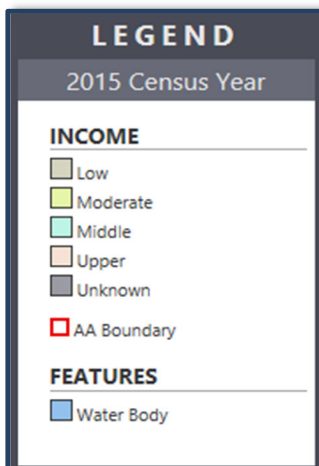
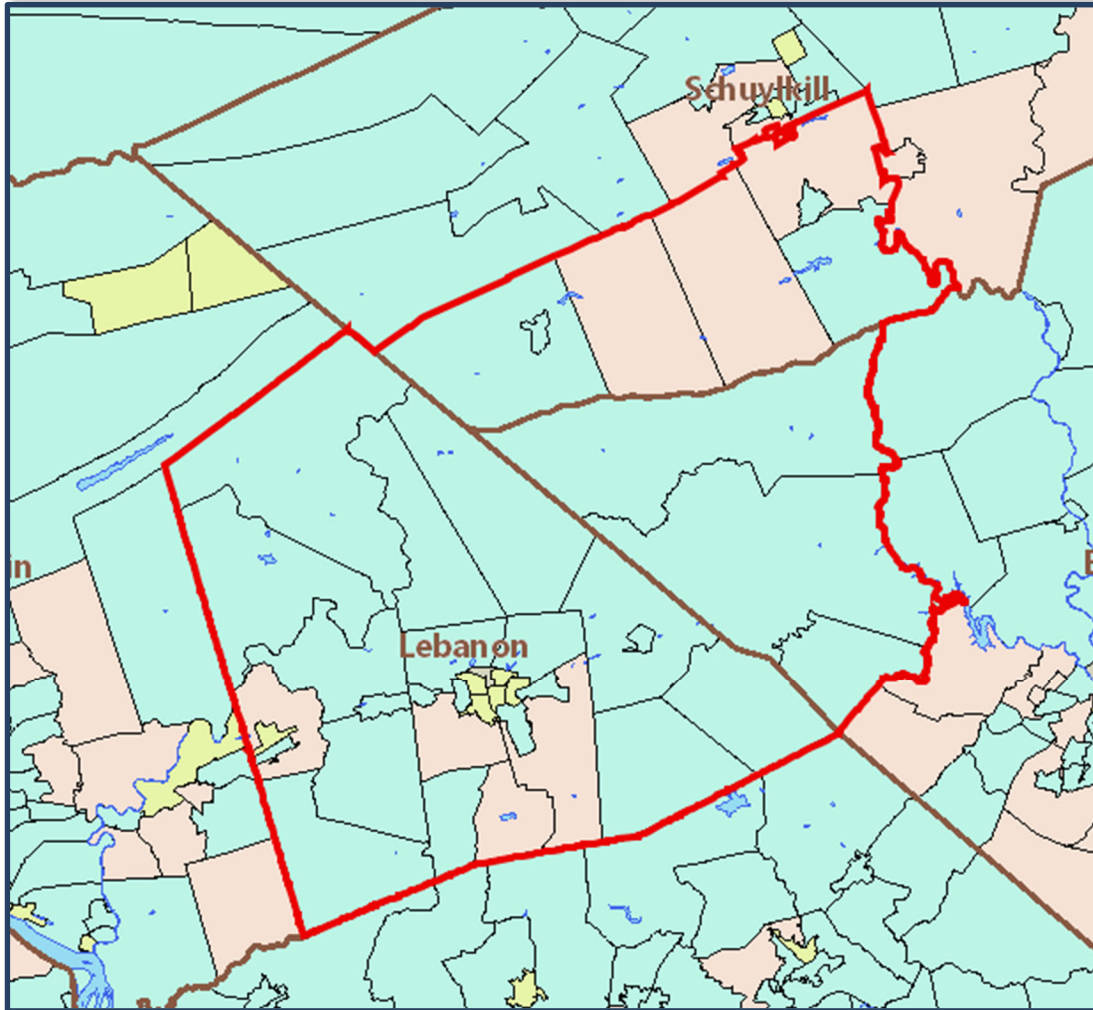
NORTHERN TIER, PA ASSESSMENT AREA (2015 ACS DATA)



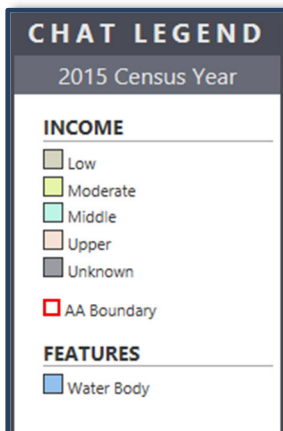
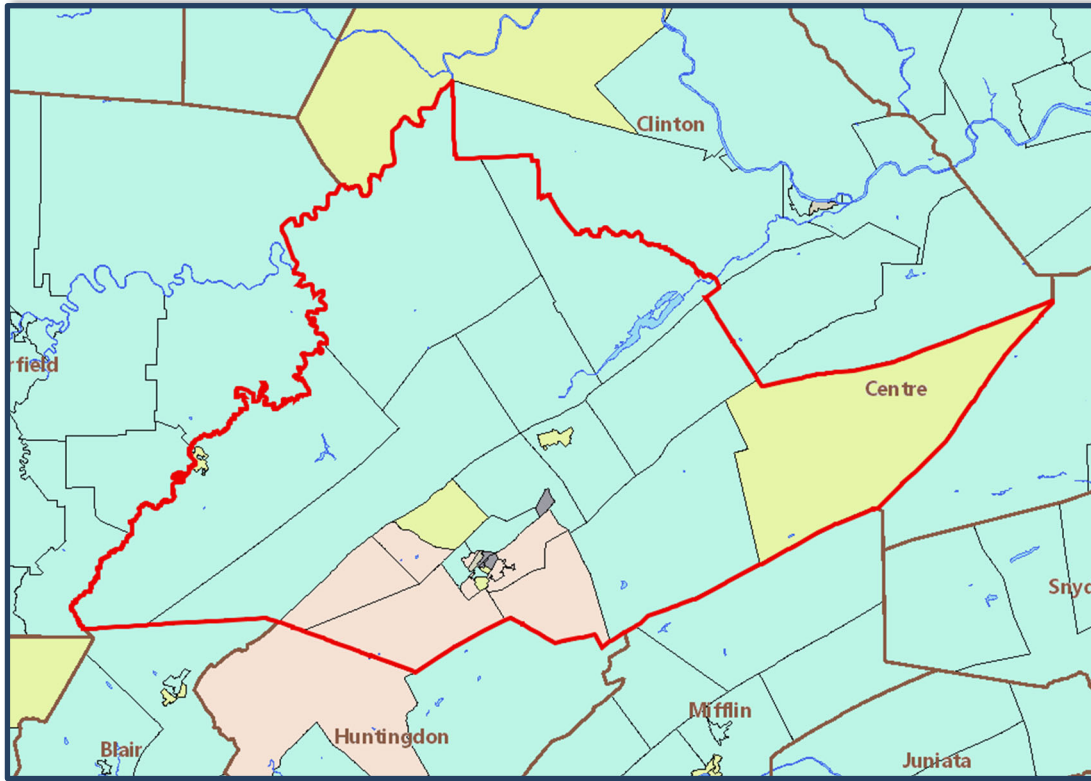
LANCASTER, PA ASSESSMENT AREA (2015 ACS DATA)



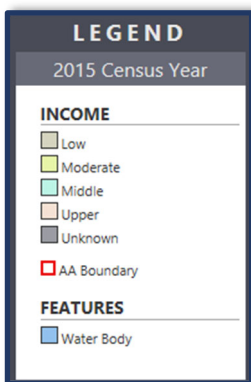
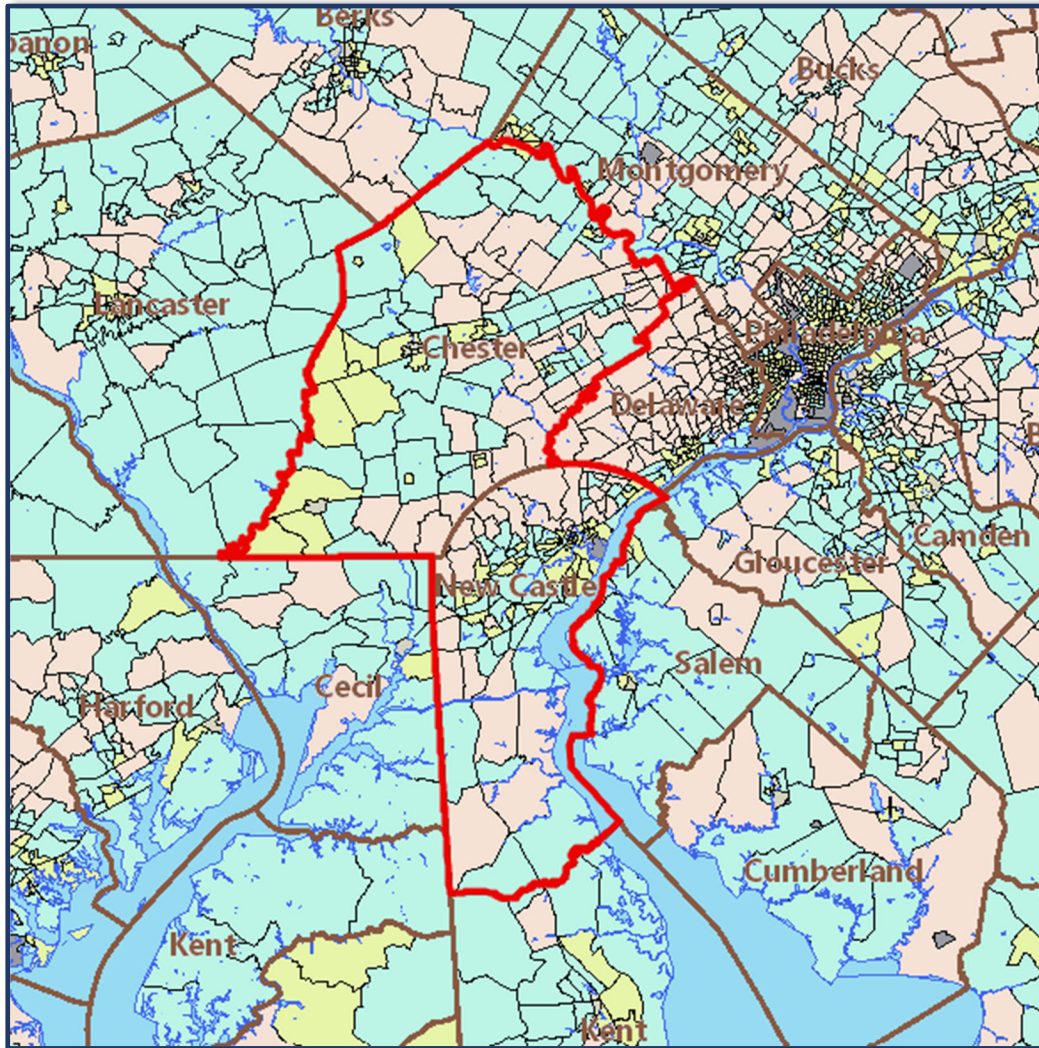
LEBANON, PA ASSESSMENT AREA (2015 ACS DATA)



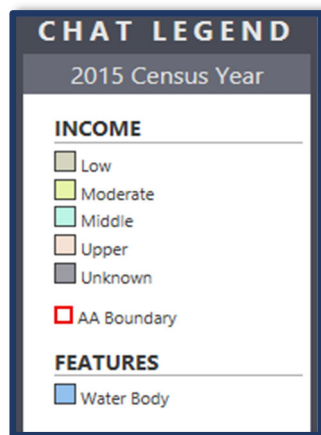
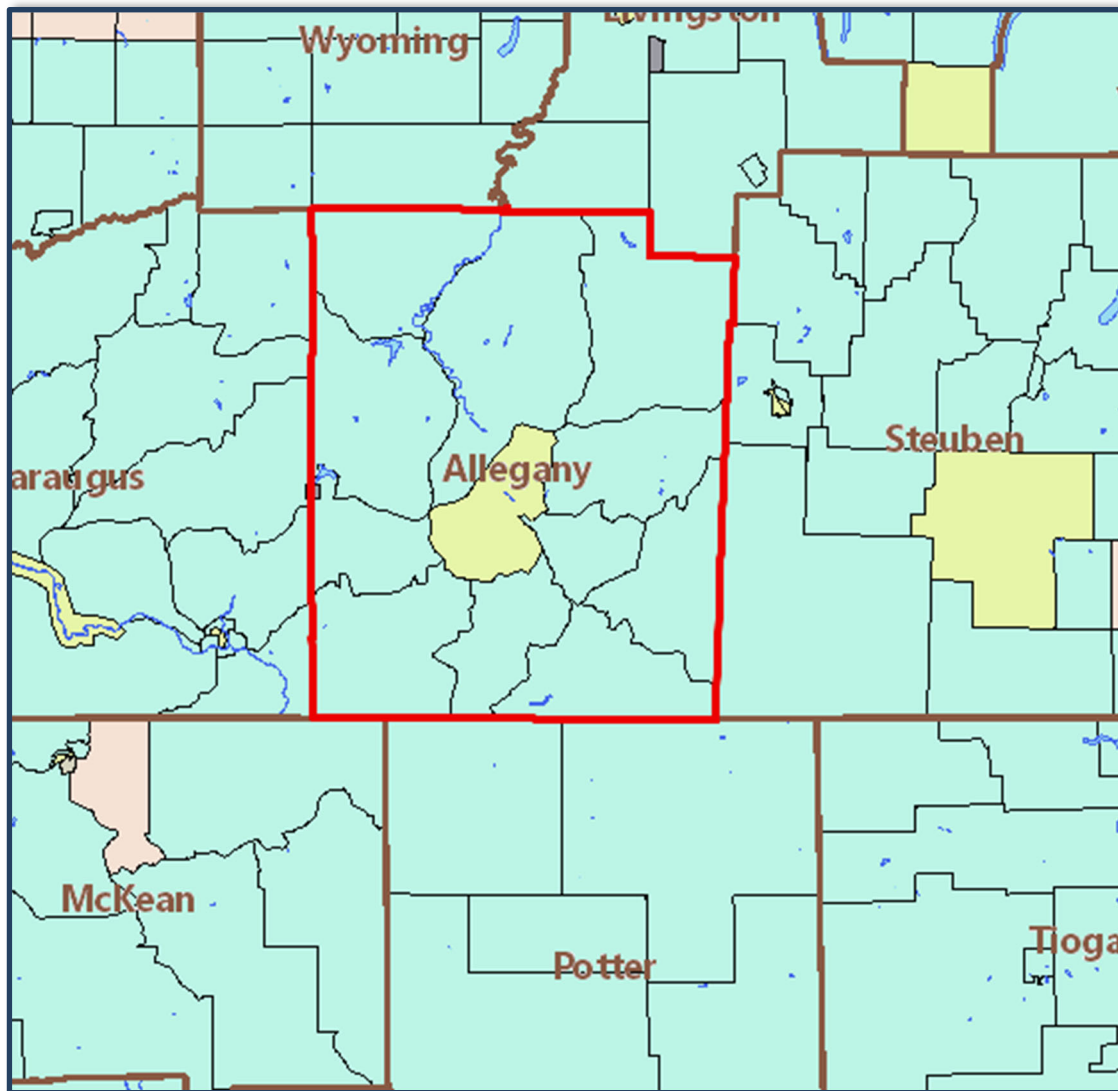
STATE COLLEGE, PA ASSESSMENT AREA (2015 ACS DATA)



CHESTER, PA / NEW CASTLE, DE ASSESSMENT AREA (2015 ACS DATA)



ALLEGANY, NY ASSESSMENT AREA (2015 ACS DATA)



DOVER, DE ASSESSMENT AREA (2015 ACS DATA)

