PUBLIC DISCLOSURE

Date of Evaluation: **JUNE 10, 2019**

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Depository Institution: **LANDMARK COMMUNITY BANK**

Institution's Identification Number: **2963547**

Address: **TWO SOUTH MAIN STREET**

PITTSTON, PENNSYLVANIA

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

INSTITUTION'S CRA RATING

This institution is rated satisfactory.

The Lending Test is rated satisfactory.
The Community Development Test is rated satisfactory.

Major factors contributing to this rating include:

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

SCOPE OF EXAMINATION

The performance of Landmark Community Bank (Landmark) under the Community Reinvestment Act (CRA) was evaluated using the Interagency Intermediate Small Institution Examination Procedures adopted by the Board of Governors of the Federal Reserve System. Performance for intermediate small banks is evaluated under two tests that consider the bank's lending and community development activities. The review period for this evaluation is from January 13, 2015 through June 10, 2019. Landmark was rated satisfactory at its previous CRA evaluation dated January 12, 2015. At the time of the previous examination, Landmark was evaluated as a small bank using the Interagency Small Institution Examination Procedures.

The lending test includes an analysis of:

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

The loan products reviewed include:

- A sample of 54 small business loans originated by the bank during calendar year 2018; and
- Home-purchase, home-improvement, and multifamily loans and the refinancing of such loans, collectively titled as Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar years 2014[1], 2015, 2016 and 2017.

Loan products were weighted according to loan volume. Due to the volume by number and by dollar amount, small business loans were given more weight in determining the bank's overall CRA performance. As of December 31, 2018, commercial loans comprised over 58% of the bank's loan portfolio by dollar volume. HMDA loans, which comprised 21% of the bank's portfolio by dollar volume, were given less weight in determining overall CRA performance. The bank's consumer loan portfolio was not considered in this evaluation, as it comprised only 11% of the total loan portfolio.

Landmark is a HMDA reporter, and therefore the bank's HMDA loans were compared to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to HMDA. At the time of the evaluation, aggregate HMDA data was available for comparison in all years included in the evaluation.

For purposes of evaluating the geographic distribution of loans, census tracts were classified on the basis of 2010 Census data for years 2014 through 2016, and on the basis of 2015 American Community Survey (ACS) data for 2017.[2] The distribution of loans to borrowers of different income levels was analyzed based upon annually-adjusted Department of Housing and Urban Development (HUD) median family income data made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2010 Census data for years 2014, 2015, and 2016, and updated 2015 ACS data for 2017, unless otherwise noted.

Landmark does not report small business loans for purposes of CRA, and therefore analysis of the bank's small business lending is based on a statistical sample of 54 commercial loans originated in 2018. For small business loans, examiners compared Dun & Bradstreet data. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses. Because Landmark is not a small business reporter, it is not included in the ranking of aggregate lenders who report such loans in the Scranton-Wilkes-Barre-Hazleton Metropolitan Statistical Area (MSA). Consequently, the bank's performance was not directly compared to the lending of aggregate small business lenders. Conversely, aggregate lending was considered for contextual purposes only.

[1] This evaluation analyzes HMDA lending in the third and fourth quarters of 2014. The first two quarters of 2014 were included in the analysis during the previous CRA evaluation.

[2] According to Federal Financial Institutions Examination Council policy, 2015 ACS data is used to analyze 2017 lending data, while previous years use 2010 Census data for comparison.

The community development test includes an analysis of:

- The number and amount of community development loans;
- The number and amount of qualified investments;
- The extent to which the bank provides community development services; and
- The bank's responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services.

Landmark's community development loans, investments, and services for the entire evaluation period were reviewed to assess the bank's performance under the community development test. It is of note that this is the first CRA examination under which Landmark will be evaluated as an intermediate small bank. Regulation BB defines "intermediate small banks" as small banks with assets of at least $313 million as of December 31 of both of the prior two calendar years, and less than $1.252 billion as of December 31 of either of the prior two calendar years. Asset thresholds are adjusted annually based on changes in the Consumer Price Index.

Since there is no CRA loan data requirement for an intermediate small institution, its next examination is under the intermediate small institution examination procedures even if that examination comes due during the institution's first year as an intermediate small institution. Landmark transitioned to an intermediate small institution on January 1, 2018.

DESCRIPTION OF INSTITUTION

Landmark was rated satisfactory at its previous CRA evaluation dated January 12, 2015, using the Interagency Small Institution Examination Procedures.

Landmark is a wholly-owned subsidiary of Landmark Bancorp, Inc., a non-complex bank holding company. Landmark, which began operations in June 1997, reported total assets of $335.6 million as of December 31, 2018.

The bank offers both consumer and commercial banking products and services through six full-service branches, including the bank's headquarters in Pittston, PA. The bank has opened three new branches (one in a moderate-income census tract, and two in upper-income tracts) and closed one branch (in an upper-income census tract). Of the bank's six branches, one branch is located in a moderate-income tract (Hazle Township branch), while three branches are located in middle-income tracts (Hazleton, Pittston, and Scranton branches). Two branches are located in upper-income tracts (Clarks Summit and Wyoming branches).

The bank has experienced asset growth since its last CRA evaluation dated January 12, 2015. Bank assets have grown 21%, from $276 million as of September 30, 2014, to nearly $336 million as of December 31, 2018. During the same period, loans have grown from $207 million as of September 30, 2014 to almost $253 million as of December 31, 2018 (22% increase).

The bank's loan portfolio as of December 31, 2018 is presented in the following table:

LOANS as of 12/31/18	**$**	**%**
Construction & Land Development	14,247	5.6
Loans Secured by Farmland	0	0.0
Secured by Residential Properties (Open-end)	4,655	1.8
Secured by Residential Properties (Closed-end)	42,044	16.6
Secured by Multifamily Residential Property	5,560	2.2
Commercial Mortgages	117,470	46.5
Commercial and Industrial	30,232	12.0
Consumer Revolving	104	<1.0
Credit Cards	130	<1.0
Automobile Loans	23,493	9.3
Consumer Installment	5,241	2.1
Obligations of States and Political Subdivisions	8,588	3.4
Other Loans and Leases	862	<1.0
TOTAL LOANS	**$252,626**	**100%**

On a dollar volume basis, commercial loans, which include commercial mortgages and commercial and industrial loans, were the most significant credit product offered by the bank and comprised over 58% of the loan portfolio. Loans secured by residential properties (open-end, closed-end loans, and multifamily loans) were also a significant credit product, comprising nearly 21% of the bank's loan portfolio.

Schedule RC-C, Part II (Loans to Small Businesses and Small Farms) of the Call Report as of December 31, 2018 indicated that nearly 51% of Landmark's commercial loans were designated as small business loans, as detailed in the following table.

LANDMARK COMMUNITY BANK COMMERCIAL LOAN PORTFOLIO		
LOAN BY SIZE	**AMOUNT OUTSTANDING AS OF 12/31/2018 ($000)**	**PERCENT**
Loans with original amounts of $100,000 or less	$7,336	5.0%
Loans with original amounts of $100,001 through $250,000	$13,735	9.3%
Loans with original amounts of $250,001 to $1 million	$53,799	36.4%
Total Small Business Loans	**$74,870**	**50.7%**
Loans greater than $1 million	$72,832	49.3%
Total Commercial Loans	**$147,702**	**100.0%**

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

DESCRIPTION OF ASSESSMENT AREA

Landmark's assessment area is located within the Scranton-Wilkes-Barre-Hazleton, PA MSA, which consists of Lackawanna, Luzerne, and Wyoming Counties. For purposes of CRA, Landmark has delineated its assessment area as the entirety of Lackawanna and Luzerne Counties which contain a total of 163 census tracts. The assessment area is entirely within the Commonwealth of Pennsylvania. The bank's assessment area complies with the requirements of the CRA and does not arbitrarily exclude low- or moderate-income census tracts.

Examiners analyzed the demographic characteristics of the assessment area as one way to measure loan demand. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition. This 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 context for the bank's performance in the assessment area where it operates.

To supplement economic, demographic, and performance data, and to gain a better perspective on credit and community development needs in the assessment area, interviews were conducted with two community representatives that serve the bank's assessment area. More specifically, discussions were held with a community development organization and an economic development organization.

Both community representatives cited a need for financial literacy training within the assessment area. Additionally, contacts noted that because of the growing Hispanic population, the area had a need for bilingual lenders who could provide assistance to this often underserved population. Contacts explained that the area is experiencing an influx of new small businesses, and cited the need for affordable small business loans, as well as entrepreneurial and business skills training for prospective new business owners.

2010 Census Data

According to 2010 Census data, the assessment area consisted of 163 census tracts: 3% (4 tracts) were designated as low-income, 22% (35 tracts) were moderate-income, 58% (94 tracts) were middle-income, and 18% (29 tracts) were upper-income. One tract had unknown income as of the 2010 Census. Two of the low-income tracts and eleven of the moderate-income tracts were located in Scranton, and another two low-income and twelve moderate-income tracts were in Wilkes-Barre. Of the remaining twelve moderate-income tracts, seven were located in Hazleton, two in Pittston, one in Carbondale, one in Nanticoke, and one in Salem Township.

2015 ACS Data

According to 2015 ACS data, the assessment area consisted of 163 census tracts: 4% (6 tracts) were designated as low-income, 26% (42 tracts) were moderate-income, 50% (81 tracts) were middle-income, and 32% (20 tracts) were upper-income. Two tracts had unknown income according to the 2015 ACS data. Of the six low-income tracts, two were located in Scranton, two in Wilkes-Barre, and two in Hazleton. Of the moderate-income tracts, eleven were located in Scranton, eleven in Wilkes-Barre, eight in Hazleton, five in Nanticoke, three in Plymouth, three in Carbondale, and one in Edwardsville.

Landmark's CRA performance was evaluated in terms of the demographic and business context in which the bank operates. According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, as of June 30, 2018, there were 22 depository institutions operating in the assessment area. As a whole, these institutions maintained $12.7 billion in deposits within the assessment area. Landmark ranked thirteenth among these institutions and held almost $292 million in deposits (2% of the deposit market). PNC Bank, N.A. led the market, with a nearly 28% market share, followed by Wells Fargo Bank, N.A. (8%), and Manufacturers and Traders Trust Company (8%).

As noted previously, Landmark's home-mortgage lending was compared to the aggregate of all lenders in the market that report real estate loans pursuant to HMDA. Annual data below provides information on the relative market share for HMDA loans in the bank's assessment area.

According to 2014 aggregate data, 9,354 home-mortgage loans were originated or purchased by 286 institutions operating in the assessment area. Wells Fargo Bank, N.A. ranked first among these institutions with 1,121 (12%) of all originations and purchases in the area, followed by Fidelity Deposit & Discount Bank with 482 originations and purchases (5%), and Quicken Loans, Inc. with 449 originations and purchases (5%). Landmark Bank ranked forty-second, with 46 (less than 1%) of all HMDA loans reported.

According to 2015 aggregate data, 10,235 home-mortgage loans were originated or purchased by 312 institutions operating in the assessment area. Again, Wells Fargo Bank, N.A. ranked first among these institutions with 1,105 (11%) of all originations or purchases in the area, followed by Quicken Loans, Inc. with 497 originations and purchases (almost 5%), and Fidelity Deposit & Discount Bank with 482 originations and purchases (nearly 5%). Landmark ranked forty-second, with 48 (less than 1%) of all loans reported.

Aggregate data in 2016 indicated that 10,697 home-mortgage loans were originated or purchased by 330 institutions operating in the assessment area. Wells Fargo Bank, N.A. ranked first among these institutions with 932 (9%) of all originations and purchases in the area, followed by Quicken Loans, Inc. with 551 originations and purchases (5%), and Community Bank, N.A. with 468 originations and purchases (4%). Landmark ranked thirty-sixth, with 79 (less than 1%) of all HMDA loans reported.

Finally in 2017, aggregate lenders reported 10,123 home-mortgage loan originations and purchases, made by 311 institutions. Wells Fargo Bank, N.A. ranked first among these institutions with 745 (7%) of all HMDA originations and purchases in the area, followed by Quicken Loans, Inc. with 542 originations and purchases (5%), and Residential Mortgage Services with 481 originations and purchases (5%). Landmark ranked forty-first, with 50 (less than 1%) of all HMDA loans reported.

As previously mentioned, Landmark does not report small business loans for purposes of the CRA, and is not included in the ranking of small business lenders operating in the assessment area. At the time of the evaluation, no aggregate information was available for 2018, and therefore 2017 small business market share information is provided for contextual purposes only. According to 2017 aggregate CRA loan data, there were a total of 89 small business loan reporters in the assessment area. These 89 reporters collectively originated and purchased 9,189 small business loans. American Express Bank, FSB was ranked first with 1,542 originations and purchases, resulting in a 17% share of the market. PNC Bank, N.A. ranked second with 1,237 originations and purchases (13%), followed by Capital One Bank USA, N.A. with 666 originations and purchases (7%). Peoples Security Bank & Trust Company, headquartered in Scranton, is ranked highest among local banks (ninth), with 344 originations and purchases (almost 4% of the market).

Since CRA small business loan reporting includes small business loans issued under corporate credit card arrangements, the reporters with the highest rankings include national originators, such as those noted above, as well as institutions like Synchrony Bank, Citibank, N.A., Wells Fargo Bank, N.A., and Chase Bank USA, N.A. Together, these seven institutions originated or purchased 5,466 (59%) of all small business loans reported in the assessment area in 2017.

ECONOMIC CHARACTERISTICS

As mentioned previously, the bank's assessment area consists of Luzerne and Lackawanna Counties, which are located in the Scranton-Wilkes-Barre-Hazleton MSA. The bank's assessment area had a population of 535,355 as of the 2010 Census, but declined slightly as of the 2015 ACS update (533,554). According to Moody's Analytics, the MSA's economy is in expansion mode and is doing better than it has in some time, although employment has been declining since mid-2018. While logistics has fueled the local economy over the past few years, growth in this sector has cooled. According to Moody's, healthcare will take over as the leading economic driver in the coming years, given the MSA's aging population.

Strengths of the local economy include: the MSA's proximity to major northeast metro areas which makes distribution a natural fit for the area; below-average living costs; and a significant healthcare presence. Weaknesses in the local economy include: a concentration of jobs in low-paying industries and occupations; a declining population; below-average per capita income; and low levels of educational attainment.

Leading employment industries in the area include education and health services (20% of total employment), professional & business services (nearly 12% of total employment), retail trade (11% of total employment), and government and manufacturing (both just under 11% of total employment). The largest employers in the MSA are the Tobyhanna Army Depot, Wyoming Valley Health Care System, Allied Services, Procter & Gamble, and Berwick Offray LLC.

Seasonally unadjusted unemployment rates for the assessment area, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table. Unemployment rates in the MSA, Commonwealth, and country as a whole decreased during the evaluation period. However, the Scranton-Wilkes-Barre-Hazleton MSA exhibited a higher unemployment rate than both the Commonwealth and the nation as a whole over all four years. Further, the unemployment rate in Luzerne County was consistently higher than that of the nation, the Commonwealth, and the MSA.

Landmark Community Bank Annual Unemployment Rates (Not Seasonally Unadjusted)				
Location	**2014**	**2015**	**2016**	**2017**
Lackawanna County	6.6	5.8	5.6	5.1
Luzerne County	7.3	6.4	6.3	5.9
Scranton-Wilkes-Barre, PA MSA	7.0	6.2	6.0	5.6
Pennsylvania	5.9	5.3	5.4	4.9
United States	6.2	5.3	4.9	4.4

Unemployment data is from the United States Department of Labor's Bureau of Labor Statistics.

HOUSING

2010 Census Data

According to 2010 Census data, the bank's assessment area contained 245,286 housing units, of which 61% were owner-occupied, 28% were rental, and 11% were vacant. The overall owner-occupancy rate in the assessment area (61%) was slightly lower than that in the Commonwealth of Pennsylvania (63%). Census data for 2010 shows that 73% of the housing units in the bank's assessment area were single-family units, 16% were two-to-four family units, 8% were multifamily units, and 3% were mobile homes.

The distribution of owner-occupied housing units located within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such tracts. In the assessment area, according to 2010 Census data, owner-occupied units represent 18% of all housing units in the assessment area's four low-income census tracts. In the assessment area's 35 moderate-income tracts, owner-occupied units comprised 46% of all housing units. In the 94 middle-income tracts, owner-occupied units comprised 63% of all housing units, and in the 29 upper-income tracts, owner-occupied units comprised 72% of all housing units.

The median age of the housing stock in the assessment area was 61 years, making it notably older than the housing stock in the Commonwealth (50 years). This may indicate a need for rehabilitation and home-improvement credit in the assessment area.

According to the 2010 Census, the median housing value in the Scranton MSA was $122,329, which was lower than the statewide median housing value of $159,300. The median housing value in the assessment area was $121,406, making its housing stock more affordable than in the Commonwealth as a whole. From an affordability standpoint, there is not a significant disparity between the median housing value in the middle-income ($114,232) and upper-income geographies ($172,253). However, the median housing value in low- and moderate-income geographies was appreciably lower ($94,243 and $89,169, respectively). It is of note that the median housing value in low-income geographies was higher than that of the moderate-income geographies.

Median gross rents in the assessment area are equal to that of the MSA and more affordable than statewide rent costs. According to 2010 Census data, the median gross rent (rent plus utilities) for the assessment area was $611, which is equal to that of the MSA, but below the $739 for the Commonwealth. Similarly, the percentage of renters paying more than 30% of monthly income on rent in the assessment area (41%) is slightly lower than the same measure statewide (44%), further confirming that housing costs are more affordable in the bank's assessment area.

<u>2015 ACS Data</u>

According to 2015 ACS data, the assessment area contained 245,469 housing units, of which 58% were owner-occupied, 29% rental, and 13% vacant. The overall owner-occupancy rate in the assessment area (58%) was again lower than that in the Commonwealth (61%). According to 2015 ACS data, 75% of the housing units in the assessment area were single-family units, 14% were two-to-four family units, 8% were multifamily units, and just under 3% were mobile homes.

The distribution of owner-occupied housing units located within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such tracts. The 2015 ACS data shows that in the six low-income census tracts, owner-occupied units comprised 31% of all housing units. In the 42 moderate-income tracts, owner-occupied units were 41% of all housing units. Finally, in the 81 middle-income tracts, owner-occupied units were 61% of all housing units, and in the 32 upper-income tracts, owner-occupied units were 75% of total housing units.

The median age of the housing stock in the assessment area was 61 years, compared to a median age of 54 years for the Commonwealth.

The median housing value in the MSA was $132,922, which is lower than the statewide median housing value of $166,000. The median housing value in the assessment area was lower than both, at $131,014, although it did increase 8% from the figure previously reported in the 2010 Census. The disparity represents a 45% increase in median housing values between middle-income ($123,682) and upper-income ($179,537) geographies, although values in low and moderate-income areas were far lower. More specifically, the median housing value in low-income geographies was $83,816, and the median housing value in moderate-income census tracts was $83,382.

2015 ACS data shows that updated median gross rent for the assessment area was $706, making it significantly lower than the $840 per month median gross rent in the Commonwealth. Again, the percentage of renters paying more than 30% of their income on rent was lower in the assessment area (43%) than in the Commonwealth (46%), indicating more affordable housing costs in the assessment area.

BORROWER INCOME DATA

2010 Census Data

The percentage of low- and moderate-income families is used as a proxy to estimate demand for home-mortgage lending in the assessment area. According to 2010 Census data, of the 139,399 families in the assessment area, 20% were designated as low-income, 18% were designated as moderate-income, 22% were middle-income, and 40% were upper-income. Families living below the poverty level represented 10% of families in the assessment area which is greater than the statewide level of 9%.

2015 ACS Data

According to the 2015 ACS data, of the 134,173 families in the assessment area, 22% were low-income families, 18% were moderate-income families, 21% were middle-income families, and 40% were upper-income families. According to ACS data, 11% of families lived below the poverty level, which again, was higher than the statewide level of 9%.

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

The assessment area's HUD-adjusted annual median family incomes for the years 2014, 2015, 2016, and 2017 are listed in the following table, along with the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low Income (<50%)	Moderate Income (50% - less than 80%)	Middle Income (80% - less than 120%)	Upper Income (120% or Greater)
2014	$58,200	Less than $29,100	$29,100 - $46,559	$46,660 - $69,839	$69,840 or more
2015	$59,000	Less than $29,500	$29,500-46,199	$47,200 - $70,799	$70,800 or more
2016	$60,400	Less than $30,200	$30,200 - $48,319	$48,320 - $72,479	$72,480 or more
2017	$59,500	Less than $29,750	$29,750 - $47,599	$47,600 - $71,399	$71,400 or more

GEOGRAPHIC BUSINESS DATA

2015 ACS Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. According to Dun & Bradstreet data, in 2018 there were 23,547 businesses operating in the assessment area. Of these businesses, 2% were located in low-income census tracts and 19% were located in moderate-income tracts. The majority of businesses were located in middle-income (52%) and upper-income (25%) census tracts. Business demographics also revealed that of the 23,547 businesses in the assessment area, 90% were small businesses (businesses with gross annual revenues of $1 million or less).

The demographics used to assess the performance context in which Landmark operated are detailed in the tables on the following pages. As explained, 2010 Census data is used for comparison for years 2014 through 2016, and the updated 2015 ACS data is used for comparison in 2017 and 2018.[3]

Landmark Community Bank Assessment Area Demographics 2014								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.5	1,981	1.4	897	45.3	28,496	20.4
Moderate-income	35	21.5	25,182	18.1	4,462	17.7	25,127	18.0
Middle-income	94	57.7	80,023	57.4	6,907	8.6	30,071	21.6
Upper-income	29	17.8	32,213	23.1	1,286	4.0	55,705	40.0
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	**163**	**100.0**	**139,399**	**100.0**	**13,552**	**9.7**	**139,399**	**100.0**
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	5,752	1,062	0.7	18.5	3,704	64.4	986	17.1
Moderate-income	49,200	22,647	15.2	46.0	19,479	39.6	7,074	14.4
Middle-income	139,692	88,332	59.5	63.2	36,050	25.8	15,310	11.0
Upper-income	50,642	36,497	24.6	72.1	9,402	18.6	4,743	9.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**245,286**	**148,538**	**100.0**	**60.6**	**68,635**	**28.0**	**28,113**	**11.5**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,194	4.9	964	4.5	162	9.4	68	5.9
Moderate-income	3,822	15.8	3,369	15.9	255	14.7	198	17.2
Middle-income	13,748	57.0	12,116	57.0	983	56.8	649	56.2
Upper-income	5,347	22.2	4,786	22.5	322	18.6	239	20.7
Unknown-income	27	0.1	18	0.1	9	0.5	0	0.0
Total Assessment Area	**24,138**	**100.0**	**21,253**	**100.0**	**1,731**	**100.0**	**1,154**	**100.0**
	Percentage of Total Businesses:			**88.0**		**7.2**		**4.8**

Based on 2010 Census information.

[3] Only small business data was analyzed in 2018, as the sample of small business loans contained 2018 originations. 2018 HMDA data was not included in the scope of this evaluation, as previously mentioned.

Landmark Community Bank
Assessment Area Demographics
2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.5	1,981	1.4	897	45.3	28,496	20.4
Moderate-income	35	21.5	25,182	18.1	4,462	17.7	25,127	18.0
Middle-income	94	57.7	80,023	57.4	6,907	8.6	30,071	21.6
Upper-income	29	17.8	32,213	23.1	1,286	4.0	55,705	40.0
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	**163**	**100.0**	**139,399**	**100.0**	**13,552**	**9.7**	**139,399**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	5,752	1,062	0.7	18.5	3,704	64.4	986	17.1
Moderate-income	49,200	22,647	15.2	46.0	19,479	39.6	7,074	14.4
Middle-income	139,692	88,332	59.5	63.2	36,050	25.8	15,310	11.0
Upper-income	50,642	36,497	24.6	72.1	9,402	18.6	4,743	9.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**245,286**	**148,538**	**100.0**	**60.6**	**68,635**	**28.0**	**28,113**	**11.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,293	5.1	1,103	4.7	175	9.1	15	4.6
Moderate-income	3,965	15.6	3,645	15.7	282	14.7	38	11.6
Middle-income	14,309	56.2	13,024	56.1	1,083	56.6	202	61.8
Upper-income	5,877	23.1	5,443	23.4	362	18.9	72	22.0
Unknown-income	29	0.1	18	0.1	11	0.6	0	0.0
Total Assessment Area	**25,473**	**100.0**	**23,233**	**100.0**	**1,913**	**100.0**	**327**	**100.0**
	Percentage of Total Businesses:			**91.2**		**7.5**		**1.3**

Based on 2010 Census information.

Landmark Community Bank Assessment Area Demographics 2016								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.5	1,981	1.4	897	45.3	28,496	20.4
Moderate-income	35	21.5	25,182	18.1	4,462	17.7	25,127	18.0
Middle-income	94	57.7	80,023	57.4	6,907	8.6	30,071	21.6
Upper-income	29	17.8	32,213	23.1	1,286	4.0	55,705	40.0
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	**163**	**100.0**	**139,399**	**100.0**	**13,552**	**9.7**	**139,399**	**100.0**
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
	#	#	%	%	#	%	#	%
Low-income	5,752	1,062	0.7	18.5	3,704	64.4	986	17.1
Moderate-income	49,200	22,647	15.2	46.0	19,479	39.6	7,074	14.4
Middle-income	139,692	88,332	59.5	63.2	36,050	25.8	15,310	11.0
Upper-income	50,642	36,497	24.6	72.1	9,402	18.6	4,743	9.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**245,286**	**148,538**	**100.0**	**60.6**	**68,635**	**28.0**	**28,113**	**11.5**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,180	5.2	982	4.8	179	9.0	19	4.8
Moderate-income	3,545	15.5	3,185	15.5	310	15.6	50	12.6
Middle-income	12,851	56.2	11,510	56.1	1,105	55.6	236	59.3
Upper-income	5,284	23.1	4,811	23.5	380	19.1	93	23.4
Unknown-income	23	0.1	11	0.1	12	0.6	0	0.0
Total Assessment Area	**22,883**	**100.0**	**20,499**	**100.0**	**1,986**	**100.0**	**398**	**100.0**
	Percentage of Total Businesses:			**89.6**		**8.7**		**1.7**

Based on 2010 Census information.

Landmark Community Bank Assessment Area Demographics 2017								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	6	3.7	4,022	3.0	1,656	41.2	28,907	21.5
Moderate-income	42	25.8	26,168	19.5	5,254	20.1	23,481	17.5
Middle-income	81	49.7	69,642	51.9	6,710	9.6	27,514	20.5
Upper-income	32	19.6	34,242	25.5	1,446	4.2	54,271	40.4
Unknown-income	2	1.2	99	0.1	22	22.2	0	0.0
Total Assessment Area	**163**	**100.0**	**134,173**	**100.0**	**15,088**	**11.2**	**134,173**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	7,893	2,476	1.7	31.4	4,380	55.5	1,037	13.1
Moderate-income	52,571	21,674	15.1	41.2	22,671	43.1	8,226	15.6
Middle-income	129,747	78,983	55.0	60.9	33,274	25.6	17,490	13.5
Upper-income	54,321	40,515	28.2	74.6	9,006	16.6	4,800	8.8
Unknown-income	937	51	0.0	5.4	696	74.3	190	20.3
Total Assessment Area	**245,469**	**143,699**	**100.0**	**58.5**	**70,027**	**28.5**	**31,743**	**12.9**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	568	2.7	493	2.7	71	3.6	4	1.2
Moderate-income	4,022	19.3	3,554	19.2	431	21.7	37	11.5
Middle-income	10,519	50.4	9,326	50.3	1,009	50.7	184	57.3
Upper-income	5,354	25.7	4,871	26.3	390	19.6	93	29.0
Unknown-income	393	1.9	302	1.6	88	4.4	3	0.9
Total Assessment Area	**20,856**	**100.0**	**18,546**	**100.0**	**1,989**	**100.0**	**321**	**100.0**
	Percentage of Total Businesses:			**88.9**		**9.5**		**1.5**

Based on 2015 ACS information.

Landmark Community Bank 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	6	3.7	4,022	3	1,656	41.2	28,907	21.5
Moderate-income	42	25.8	26,168	19.5	5,254	20.1	23,481	17.5
Middle-income	81	49.7	69,642	51.9	6,710	9.6	27,514	20.5
Upper-income	32	19.6	34,242	25.5	1,446	4.2	54,271	40.4
Unknown-income	2	1.2	99	0.1	22	22.2	0	0
Total Assessment Area	**163**	**100.0**	**134,173**	**100.0**	**15,088**	**11.2**	**134,173**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	7,893	2,476	1.7	31.4	4,380	55.5	1,037	13.1
Moderate-income	52,571	21,674	15.1	41.2	22,671	43.1	8,226	15.6
Middle-income	129,747	78,983	55	60.9	33,274	25.6	17,490	13.5
Upper-income	54,321	40,515	28.2	74.6	9,006	16.6	4,800	8.8
Unknown-income	937	51	0	5.4	696	74.3	190	20.3
Total Assessment Area	**245,469**	**143,699**	**100.0**	**58.5**	**70,027**	**28.5**	**31,743**	**12.9**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	562	2.4	492	2.3	66	3.3	4	1.1
Moderate-income	4,559	19.4	4,092	19.3	420	20.9	47	13.1
Middle-income	12,175	51.7	10,925	51.6	1,047	52.1	203	56.7
Upper-income	5,799	24.6	5,313	25.1	387	19.3	99	27.7
Unknown-income	452	1.9	359	1.7	88	4.4	5	1.4
Total Assessment Area	**23,547**	**100.0**	**21,181**	**100.0**	**2,008**	**100.0**	**358**	**100.0**
	Percentage of Total Businesses:			**90.0**		**8.5**		**1.5**

Based on 2015 ACS information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

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

Loan-to-Deposit Ratio

Landmark's loan-to-deposit ratio is considered reasonable given the bank's size, financial condition, and assessment area credit needs. During the evaluation period, the bank's loan-to-deposit ratio averaged approximately 90% which was above the peer of 79%.

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

The table on the following page shows that Landmark's loan-to-deposit ratio averaged nearly 90% over the 18 quarter period since the previous CRA evaluation. The bank's ratio was higher than the level of its national peer group[4] (nearly 80%), and slightly higher than its own performance at the previous CRA evaluation (88%).

Landmark Community Bank Historical Loan-to-Deposit Ratios			
As of Date	**Net Loans ($ Thousands)**	**Total Deposits ($ Thousands)**	**Loan-to-Deposit Ratio**
12/30/2018	$249,342	$293,830	84.9%
09/30/2018	$252,509	$282,473	89.4%
06/30/2018	$263,181	$291,836	90.2%
03/31/2018	$262,399	$298,217	88.0%
12/31/2017	$261,885	$297,803	87.9%
09/30/2017	$258,619	$271,256	95.3%
06/30/2017	$255,913	$258,117	99.2%
03/31/2017	$243,921	$259,399	94.0%
12/31/2016	$239,805	$259,206	92.5%
09/30/2016	$230,989	$254,712	90.7%
06/30/2016	$221,793	$245,677	90.3%
03/31/2016	$217,561	$248,564	87.5%
12/31/2015	$209,164	$229,276	91.2%
09/30/2015	$198,353	$224,079	88.5%
06/30/2015	$198,988	$228,667	87.0%
03/31/2015	$201,174	$229,005	87.9%
12/31/2014	$205,254	$238,484	86.1%
09/30/2014	$204,500	$236,924	86.3%
Quarterly Loan-to-Deposit Ratio Average Since Previous Evaluation			**89.8%**

Source: The Uniform Bank Performance Report

Assessment Area Concentration

Landmark's home-mortgage and small business lending were analyzed to determine the volume of loans extended inside and outside of the bank's assessment area as delineated for purposes of the CRA. The analysis revealed that a majority of Landmark's loans and other lending activities are outside of the bank's assessment area.

The table on the following page indicates that during the evaluation period, 34% of the total number of HMDA loans reported and 59% of the aggregate dollar amount of HMDA loans reported were extended in the bank's assessment area, primarily due to the bank's purchase of a pool of loans in 2016. In 2016, the bank reported a total of 441 HMDA loans. Of these, only 80 were originations, while 361 were loans that the institution had purchased and were predominantly outside of the assessment area.

[4] Landmark's peer group consists of all insured commercial banks having assets between $100 million and $300 million, with three or more full-service banking offices, and located in a MSA.

With respect to small business loans, 78% of the number of small business loans sampled were extended within the bank's assessment area, while nearly 69% of the dollar amount of small business loans sampled were extended in the bank's assessment area.[5]

The following table shows the distribution of lending inside and outside of the bank's assessment area, indicating a majority of loans are outside the bank's assessment area.

Landmark Community Bank Lending Inside and Outside the Assessment Area								
	Inside				Outside			
Loan Type	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase – Conventional	97	20.7	$13,916	45.0	371	79.3	$17,008	55.0
Home Improvement	23	82.1	$1,279	76.4	5	17.9	$396	23.6
Multi-Family Housing	16	100.0	$4,171	100.0	0	0.0	$0	0.0
Refinancing	63	92.6	$8,369	83.7	5	7.4	$1,630	16.3
Total HMDA Related Loans	**199**	**34.3**	**$27,735**	**59.3**	**381**	**65.7**	**$19,034**	**40.7**
Small Business	46	78.0	$47,683	68.9	13	22.0	$21,514	31.1
Total Small Business-Related Loans	**46**	**78.0**	**$47,683**	**68.9**	**13**	**22.0**	**$21,514**	**31.1**
TOTAL LOANS	**245**	**38.3**	**$75,418**	**65.0**	**394**	**61.7**	**$40,548**	**35.0**

Borrower Distribution of Lending[6]

An analysis of Landmark's small business and home-mortgage loans was conducted in conjunction with a review of the demographic and economic characteristics of the assessment area to determine the extent of lending to businesses of different sizes and borrowers of different income levels. As mentioned previously, Landmark is primarily a commercial lender. Accordingly, small business lending was weighted more heavily than home-mortgage lending in this analysis.

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

Small Business Lending

An analysis of Landmark's distribution of loans to businesses reflects reasonable penetration among business customers of different sizes, including small businesses in the assessment area. For purposes of the 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.

[5] The analysis of small business lending is based on a statistical sample of 54 commercial loans originated by the bank in 2018.

[6] The information used to evaluate lending activity by Landmark is detailed in the Loan Distribution Tables contained in the Appendix.

As mentioned previously, because Landmark is not a CRA small business reporter, a statistical sample of 54 of the bank's commercial loans from 2018 was used to evaluate performance. The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in the assessment area. In 2018, the sample of 54 loans contained 47 loans that were made within the bank's assessment area. Of those 47 loans, 89% of the bank's loans (42 loans) were originated to small businesses. No peer group data was available at the time of the examination, but this performance was consistent with the proxy of small businesses in the assessment area (90%).

Small business loans were further analyzed to determine the extent to which loans were made 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 credit needs for small businesses. Of Landmark's loans, 51% of loans were extended in the amount of $100 thousand or less. It is noted, however, that credit card loans are included as small business loans for CRA reporting purposes, and are generally originated in lower dollar amounts, which skews aggregate small business data. Though aggregate data was not available for 2018 at the time of this evaluation, the top three CRA small business reporters in the assessment area in 2017 (American Express Bank, FSB; PNC Bank, N.A.; and Capital One Bank USA, N.A.) are large national credit card issuers.

Home-Mortgage Lending

Landmark's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is poor. Over the evaluation period, Landmark originated 199 HMDA loans in the assessment area in an aggregate amount of nearly $28 million.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted HUD median family income data. Further, the respective percentages of low-, moderate-, middle- and upper-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. As noted previously, according to the 2010 Census data, approximately 20% of assessment area families were low-income, and 18% were moderate-income. The majority of families in the assessment area were middle- and upper-income families (22% and 40%, respectively). Likewise, according to the 2015 ACS data, approximately 22% of assessment area families were low-income, and 18% were moderate-income. Again, the majority of families in the assessment area were middle- and upper-income families (21% and 40%, respectively).

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. 2010 Census data reports 139,399 households that are families in the assessment area, with 20% of families (28,496) designated as low-income, and 18% of families (25,127) designated as moderate-income families. This indicates a significant need for home-mortgage credit among this segment of the population. Though affordable housing was noted as a need in the assessment area, it is recognized that a large percentage of renters in the assessment area (43%) spend more than 30% of their income on rent, which makes it difficult, particularly for low- and moderate-income renters, to save the customary down payment and closing costs necessary to purchase a home.

The following tables compare Landmark's 2014, 2015, 2016 and 2017 home-mortgage lending to aggregate home-mortgage lending levels, and uses the percentage of low-, moderate-, middle- and upper-income families as proxies to estimate loan demand. Tables are divided to compare lending from 2014 through 2016 to 2010 Census data, and 2017 lending data to 2015 ACS data.

Landmark Community Bank Borrower Distribution of HMDA Loans							
Income Level	% Families by Family Income (2010 Census Data)	Aggregate Comparison					
		2014		2015		2016	
		% Landmark Lending	% Aggregate Lending	% Landmark Lending	% Aggregate Lending	% Landmark Lending	% Aggregate Lending
Low	20.4%	9.1%	8.0%	4.2%	7.3%	5.1%	8.2%
Moderate	18.0%	4.5%	18.4%	6.3%	17.8%	11.4%	17.7%
Middle	21.6%	4.5%	21.8%	14.6%	20.9%	11.4%	21.4%
Upper	40.0%	59.1%	38.3%	50.0%	37.5%	49.4%	36.2%
Unknown	0.0%	22.7%	13.5%	25.0%	16.5%	22.8%	16.6%
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Landmark Community Bank Borrower Distribution of HMDA Loans			
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison	
		2017	
		% Landmark Lending	% Aggregate Lending
Low	21.5%	0.0%	7.2%
Moderate	17.5%	12.0%	18.1%
Middle	20.5%	18.0%	21.8%
Upper	40.4%	50.0%	37.0%
Unknown Income	0.0%	20.0%	16.0%
All Borrowers	**100%**	**100%**	**100%**

Lending to Low-Income Borrowers

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

2010 Census Data

According to 2010 Census data, 20% of families within the assessment area were categorized as low-income. In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration that the home-mortgage credit needs of such individuals and families can be a challenge to address through conventional loan products, presenting a significant obstacle to homeownership.

Landmark's lending in 2014 to low-income borrowers was poor. In 2014, 9% of the bank's HMDA loans (2 loans) were originated to low-income borrowers. This is comparable to the 8% low-income borrower lending performance by aggregate lenders, but significantly lags the percentage of low-income families by family income (20%). The two loans made to low-income borrowers were home improvement loans. None of the bank's home-purchase loans, refinance loans, or multifamily loans were made to low-income borrowers. Aggregate lenders made 8% of home-purchase loans, 7% of refinance loans, 11% of home-improvement loans, and no multifamily loans to low-income borrowers during 2014.

Landmark's lending in 2015 to low-income borrowers was poor. In 2015, 4% of the bank's HMDA loans (2 loans) were originated to low-income borrowers. This is less than the 7% low-income borrower lending performance by aggregate lenders, and significantly lags the percentage of low-income families by family income (20%). By loan type, 5% of the bank's home-purchase loans (1 loan), 8% of refinance loans (1 loan), and no home-improvement or multifamily loans were made to low-income borrowers. Aggregate lenders made 8% of home-purchase loans, 6% of refinance loans, 10% of home-improvement loans, and no multifamily loans to low-income borrowers during 2015.

Landmark's HMDA lending to low-income borrowers increased slightly in 2016, but was still considered to be poor. In 2016, 5% of the bank's HMDA loans (4 loans) were originated to low-income borrowers. This is below aggregate lending performance to low-income borrowers (8%), and lagged the proxy (20%). By product, Landmark made 7% of home-purchase loans (3 loans), 20% of home-improvement loans (1 loan), and no refinance or multifamily loans to low-income borrowers. For comparison, aggregate lenders made 9% of home-purchase loans, 7% of refinance loans, 10% of home-improvement loans, and no multifamily loans to low-income borrowers in 2016.

2015 ACS Data

According to updated 2015 ACS data, 22% of families within the assessment area were categorized as low-income. Landmark did not make any HMDA loans to low-income borrowers in 2017, resulting in a very poor performance. By product type, aggregate lenders made 8% of home-purchase loans, 6% of refinance loans, 9% of home-improvement loans, and no multifamily loans to low-income borrowers in 2017.

Lending to Moderate-Income Borrowers

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

2010 Census Data

Landmark's 2014 lending to moderate-income borrowers was poor. In 2014, 5% of the bank's HMDA loans (1 loan) were originated to moderate-income borrowers. This is below the performance of aggregate lenders in the area, with 18% of HMDA loans originated to moderate-income borrowers, and below the proxy of moderate-income families by family income (18%). By product type, 14% of Landmark's home-purchase loans (1 loan), and no refinance, home-improvement, or multifamily loans were made to moderate-income borrowers. Aggregate lenders made 21% of home-purchase loans, 15% of refinance loans, 17% of home-improvement loans, and no multifamily loans to moderate-income borrowers.

Landmark's 2015 lending to moderate-income borrowers was poor. In 2015, 6% of the bank's HMDA loans (3 loans) were originated to moderate-income borrowers. This is below the performance of aggregate lenders in the area and the proxy of moderate-income families by family income (both 18%). By product type, 5% of Landmark's home-purchase loans (1 loan), 8% of refinance loans (1 loan), 11% of home-improvement loans (1 loan), and no multifamily loans were made to moderate-income borrowers. Aggregate lenders made 21% of home-purchase loans, 14% of refinance loans, 17% of home-improvement loans, and no multifamily loans to moderate-income borrowers in 2015.

Landmark Bank's HMDA lending to moderate-income borrowers increased in 2016, but was still poor. In 2016, 11% of the bank's HMDA loans (9 loans) were originated to moderate-income borrowers. This is less than the 18% by aggregate lending performance and the proxy (both 18%). By product, Landmark made 22% of home-purchase loans (9 loans), and no refinance, home-improvement, or multifamily loans to moderate-income borrowers. For comparison, aggregate lenders made 21% of home-purchase loans, 13% of refinance loans, 18% of home-improvement loans, and no multifamily loans to moderate-income borrowers.

<u>2015 ACS Data</u>

According to 2015 ACS data, 18% of families within the assessment area were categorized as moderate-income. In 2017, Landmark's lending to moderate-income borrowers was poor. In 2017, 12% of the bank's HMDA loans (6 loans) were originated to moderate-income borrowers, which fell below the aggregate (18%) and the proxy (18%). By loan type, Landmark made 14% of home-purchase loans (4 loans), 8% of refinance loans (1 loan), 14% of home-improvement loans (1 loan), and no multifamily loans to moderate-income borrowers. In comparison, aggregate lenders made 19% of home-purchase loans, 16% of refinance loans, 19% of home-improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

Geographic Distribution of Lending

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

Small Business Lending

The geographic distribution of Landmark's small business loans reflects reasonable dispersion throughout the assessment area, in the context of the assessment area's demographic and economic characteristics, during the evaluation period. As mentioned previously, because the bank is not a small business reporter, this conclusion is based on a sample of small business loans made during 2018. Of the 54 loans sampled, 47 loans were made within the bank's designated assessment area, and were considered for purposes of geographic distribution in the assessment area.

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 within the tract. Based on Dun & Bradstreet small business data, in 2018, 2% of the assessment area's 23,547 businesses were located in low-income tracts and 19% were located in moderate-income tracts. The majority of businesses were located in the middle-income and upper-income tracts (52% and 25%, respectively).

The table below presents Landmark's small business geographic loan distribution. The sample of the bank's loans is compared to the proxy of businesses by census tract income level. Comparison to aggregate lending performance was not possible, as aggregate data was not available at the time of the evaluation.

Landmark Community Bank Geographic Distribution of Small Business Loans			
Income Level	% of Businesses by Tract Income Level (2015 ACS Data)	Aggregate Comparison	
		2018	
		% Landmark Lending	% Aggregate Lending
Low	2.4%	0.0%	NA
Moderate	19.4%	25.5%	NA
Middle	51.7%	59.6%	NA
Upper	24.6%	14.9%	NA
Unknown Income	1.9%	0.0%	NA
All Borrowers	**100%**	**100%**	**NA**

Lending in Low-Income Census Tracts

Overall, Landmark's small business lending in low-income census tracts is poor. Landmark did not originate any small business loans in the assessment area's six low-income tracts in 2018. The bank's lending performance is below the proxy of 2% of businesses located in low-income tracts.

Lending in Moderate-Income Census Tracts

Landmark's small business lending in moderate-income census tracts is excellent. In 2018, Landmark originated nearly 26% of its small business loans (12 loans) in the assessment area's moderate-income census tracts. The bank's lending level in moderate-income tracts exceeded that of the proxy (19%).

Home-Mortgage Lending

Landmark's geographic distribution of home-mortgage loans reflects excellent dispersion throughout the assessment area, taking into consideration the bank's business strategy and the assessment area's demographics and economic characteristics.

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 2010 Census data, which was used as a proxy for lending from 2014 through 2016, the assessment area's 4 low-income census tracts contained less than 1% of owner-occupied housing units in the area, while the 35 moderate-income tracts contained 15% of owner-occupied units. A majority of owner-occupied units were located in the middle-income (60%) and upper-income census tracts (25%).

According to 2015 ACS data, which was used as a proxy for 2017 lending, 2% of owner-occupied units were located in the assessment area's 6 low-income census tracts, and 15% of owner-occupied units were located in the 42 moderate-income tracts. A majority of owner-occupied units remained in the middle-income tracts (55%), and upper-income tracts (28%).

The tables below present Landmark's geographic distribution of HMDA lending, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area for the evaluation period. Tables are divided to compare lending from 2013 through 2016 to 2010 Census data, and 2017 lending to 2015 ACS data.

Landmark Community Bank Geographic Distribution of HMDA Loans							
Income Level	% Owner-Occupied Units (2010 Census Data)	Aggregate Comparison					
		2014		2015		2016	
		% Landmark Lending	% Aggregate Lending	% Landmark Lending	% Aggregate Lending	% Landmark Lending	% Aggregate Lending
Low	0.7%	0.0%	0.7%	2.1%	0.8%	1.3%	0.7%
Moderate	15.2%	18.2%	12.4%	20.8%	11.2%	11.4%	11.2%
Middle	59.5%	59.1%	57.7%	52.1%	58.7%	69.6%	58.7%
Upper	24.6%	22.7%	29.1%	25.0%	29.2%	17.7%	29.4%
Unknown	0.0%	0.0%	0.0%	0.0%	0.0%	0.0 %	0.0%
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Landmark Community Bank Geographic Distribution of HMDA Loans			
Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison	
		2017	
		% Landmark Lending	% Aggregate Lending
Low	1.7%	2.0%	1.6%
Moderate	15.1%	30.0%	13.8%
Middle	55.0%	48.0%	51.8%
Upper	28.2%	20.0%	32.8%
Unknown Income	0.0%	0.0%	0.1%
All Borrowers	**100%**	**100%**	**100%**

Lending in Low-Income Census Tracts

Landmark's overall HMDA lending in low-income tracts was considered reasonable. Based on owner-occupied demographics, lending opportunities in low-income census tracts were quite limited. However, during the evaluation period, Landmark Bank's HMDA lending in low-income census tracts was consistent or exceeded both the aggregate lender performance as well as the designated proxy.

2010 Census Data

Landmark's lending in low-income census tracts in 2014 was poor. In 2014, none of the bank's home-mortgage loans were located in low-income census tracts. It is noted that both aggregate performance and proxy are also low (both 1%). By loan type, aggregate lenders originated 1% of home-purchase loans, 1% of refinance loans, 1% of home-improvement loans, and 11% of multifamily loans in low-income census tracts.

Landmark's lending in low-income census tracts in 2015 was reasonable. In 2015, 2% of the bank's HMDA loans (1 loan) were originated in a low-income census tract. Performance was slightly above the performance of aggregate lenders and proxy (both 1%). By loan type, 5% of home-purchase loans (1 loan) were originated by the bank in a low-income census tract. No refinance, home-improvement loans, or multifamily loans were originated by the bank in low-income census tracts. By comparison, aggregate lenders originated 1% of home-purchase loans, 1% of refinance loans, 1% of home-improvement loans, and 7% of multifamily loans within the assessment area's low-income census tracts.

Landmark's lending in low-income census tracts in 2016 was reasonable. In 2016, 1% of the bank's home-mortgage loans (1 loan) were located in a low-income census tract. This performance was on par with both the performance of aggregate lenders and proxy (both 1%). By loan type, 20% of home-improvement loans (1 loan) were originated by the bank in a low-income census tract, while there were no home-purchase, refinance, or multifamily loans originated by the bank in low-income census tracts. By comparison, aggregate lenders originated 1% of home-purchase loans, 1% of refinance loans, 1% of home-improvement loans, and 6% of multifamily loans in low-income census tracts.

2015 ACS Data

Landmark's lending in low-income census tracts in 2017 was reasonable. In 2017, 2% of the bank's home-mortgage loans (1 loan) were located in a low-income census tract. This performance was on par with both the performance of aggregate lenders and proxy (both just under 2%). By loan type, 4% of home-purchase loans (1 loan) were originated by the bank in a low-income census tract, while there were no refinance, home-improvement, or multifamily loans in low-income census tracts. By comparison, aggregate lenders originated 2% of home-purchase loans, 1% of refinance loans, 1% of home-improvement loans, and 3% of multifamily loans in low-income census tracts.

Lending in Moderate-Income Census Tracts

Landmark's overall HMDA lending in moderate-income tracts was considered excellent. Compared to lending opportunities in the assessment area's low-income census tracts, moderate-income tracts offered more opportunities for home-mortgage lending.

2010 Census Data

Landmark's lending in moderate-income census tracts in 2014 was excellent. In 2014, 18% of the bank's home-mortgage loans (4 loans) were originated in moderate-income census tracts. This performance exceeds both the performance of aggregate lenders (12%) as well as proxy (15%). By loan type, 29% of the bank's home-purchase loans (2 loans), 50% of home-improvement loans (1 loan), and 33% of multifamily loans (1 loan) were originated in moderate-income census tracts. No refinance loans were originated by the bank in moderate-income census tracts. By comparison, aggregate lenders originated 12% of home-purchase loans, 12% of refinance loans, 13% of home-improvement loans, and 31% of multifamily loans in moderate-income census tracts.

Landmark's lending in moderate-income census tracts in 2015 exceeded that in 2014, and was considered excellent. In 2015, 21% of the bank's home-mortgage loans (10 loans) were originated in moderate-income census tracts. This performance exceeds both the performance of aggregate lenders (11%) as well as proxy (15%). By loan type, 24% of the bank's home-purchase loans (5 loans), 15% of refinance loans (2 loans), 22% of home-improvement loans (2 loans), and 20% of multifamily loans (1 loan) were originated in moderate-income census tracts. By comparison, aggregate lenders originated 12% of home-purchase loans, 9% of refinance loans, 12% of home-improvement loans, and 30% of multifamily loans in moderate-income census tracts.

Finally, Landmark's lending in moderate-income census tracts in 2016 dropped compared to previous years in the evaluation, and was considered reasonable. In 2016, 11% of the bank's home-mortgage loans (9 loans) were originated in moderate-income census tracts. This performance falls slightly below the performance of the proxy (15%), but in line with the performance of aggregate lenders (11%). By loan type, 2% of home-purchase loans (1 loan), 18% of refinance loans (5 loans), 20% of home-improvement loans (1 loan), and 40% of multifamily loans (2 loans) were originated in moderate-income census tracts. By comparison, aggregate lenders originated 12% of home-purchase loans, 11% of refinance loans, 11% of home-improvement loans, and 25% of multifamily loans in moderate-income census tracts in 2016.

2015 ACS Data

Landmark's lending in moderate-income census tracts in 2017 was excellent. In 2017, 30% of the bank's home-mortgage loans (15 loans) were originated in moderate-income census tracts. This performance exceeds both the performance of aggregate lenders (14%) as well as proxy (15%). By loan type, 25% of the bank's home-purchase loans (7 loans), 33% of refinance loans (4 loans), 29% of home-improvement loans (2 loans), and 67% of multifamily loans (2 loans) were originated in moderate-income census tracts. By comparison, aggregate lenders originated 15% of home-purchase loans, 10% of refinance loans, 15% of home-improvement loans, and 31% of multifamily loans in moderate-income census tracts in 2017.

Response to CRA-Related Complaints

No CRA-related complaints were filed with the bank or the Federal Reserve Bank of Philadelphia during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

As mentioned previously, Landmark's community development loans, investments, and services for the entire evaluation period were reviewed to assess the bank's performance under the community development test. It is noteworthy that this is the first CRA examination under which Landmark's community development activity was evaluated.

Community Development Loans

During the evaluation period, Landmark originated five qualified community development loans totaling nearly $553 thousand. All five loans promoted affordable housing for low- and moderate-income residents of the bank's assessment area. A majority of the affordable housing loans were for affordable rental housing units, as average rent costs of the properties were well below that of other units in the assessment area.

Community Development Investments

Landmark made grants and donations to organizations in its assessment area totaling $6,860. All donations went to organizations serving and supporting the greater Hazleton area, including economic development and downtown revitalization efforts. The majority of the Hazleton population is comprised of low- and moderate-income individuals.

Community Development Services

Throughout the evaluation period, one of the bank's board members served on the board of directors and the finance committee of Northeast Childcare Services, which provides early care and education to children in the Scranton area. The organization is headquartered in a moderate-income census tract and primarily serves low- and moderate-income individuals.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

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

CRA APPENDICES

CRA APPENDIX A: GLOSSARY

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

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

Community development: All Agencies have adopted the following language.

(1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
(2) Community services targeted to low- or moderate-income individuals;
(3) Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less;
(4) Activities that revitalize or stabilize-
   (i) Low-or moderate-income geographies;
   (ii) Designated disaster areas; or
   (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
      A. Rates of poverty, unemployment, and population loss; or
      B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or
(5) Loans, investments, and services that-
   (i) Support, enable or facilitate projects or activities that meet the “eligible uses” criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
   (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
   (iii) Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

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

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

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

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the lending, investment, and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small loan(s) to business(es): A loan included in loans to small businesses as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in loans to small farms as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

CRA APPENDIX B: SMALL BUSINESS LOAN DISTRIBUTION TABLE

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE

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	12	25.5%	2,297	4.8%	0	0.0%	0	0.0%
Middle	28	59.6%	43,686	91.6%	0	0.0%	0	0.0%
Upper	7	14.9%	1,700	3.6%	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	**47**	**100.0%**	**47,683**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Revenue							
Total $1 Million or Less	42	89.4%	45,897	96.3%	0	0.0%	0	0.0%
Over $1 Million	4	8.5%	1,775	3.7%	0	0.0%	0	0.0%
Not Known	1	2.1%	12	0.0%	0	0.0%	0	0.0%
Total	**47**	**100.0%**	**47,683**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size							
$100,000 or less	24	51.1%	1,105	2.3%	0	0.0%	0	0.0%
$100,001 - $250,000	10	21.3%	1,620	3.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	9	19.1%	5,313	11.1%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	4	8.5%	39,644	83.1%	0	0.0%	0	0.0%
Total	**47**	**100.0%**	**47,683**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	21	50.0%	969	2.1%	0	0.0%	0	0.0%
$100,001 - $250,000	9	21.4%	1,470	3.2%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	9	21.4%	5,313	11.6%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	3	7.1%	38,144	83.1%	0	0.0%	0	0.0%
Total	**42**	**100.0%**	**45,897**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

CRA APPENDIX C: HMDA LOAN DISTRIBUTION TABLES

2014 HMDA LOAN DISTRIBUTION TABLE

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	2	28.6%	359	23.4%	1	14.3%	69	4.5%
Middle	3	42.9%	629	41.1%	0	0.0%	0	0.0%
Upper	2	28.6%	544	35.5%	6	85.7%	1,463	95.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**1,532**	**100.0%**	**7**	**100.0%**	**1,532**	**100.0%**
	Refinance							
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	9	90.0%	925	88.5%	1	10.0%	43	4.1%
Upper	1	10.0%	120	11.5%	7	70.0%	789	75.5%
Unknown	0	0.0%	0	0.0%	2	20.0%	213	20.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**1,045**	**100.0%**	**10**	**100.0%**	**1,045**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	2	100.0%	56	100.0%
Moderate	1	50.0%	10	17.9%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	46	82.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**56**	**100.0%**	**2**	**100.0%**	**56**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	33.3%	150	27.3%	0	0.0%	0	0.0%
Middle	1	33.3%	225	41.0%	0	0.0%	0	0.0%
Upper	1	33.3%	174	31.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	549	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**549**	**100.0%**	**3**	**100.0%**	**549**	**100.0%**
	HMDA Totals							
Low	0	0.0%	0	0.0%	2	9.1%	56	1.8%
Moderate	4	18.2%	519	16.3%	1	4.5%	69	2.2%
Middle	13	59.1%	1,779	55.9%	1	4.5%	43	1.4%
Upper	5	22.7%	884	27.8%	13	59.1%	2,252	70.8%
Unknown	0	0.0%	0	0.0%	5	22.7%	762	23.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**22**	**100.0%**	**3,182**	**100.0%**	**22**	**100.0%**	**3,182**	**100.0%**

2015 HMDA LOAN DISTRIBUTION TABLE

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	1	4.8%	295	11.1%	1	4.8%	110	4.1%
Moderate	5	23.8%	330	12.4%	1	4.8%	77	2.9%
Middle	9	42.9%	845	31.7%	4	19.0%	312	11.7%
Upper	6	28.6%	1,198	44.9%	11	52.4%	1,723	64.6%
Unknown	0	0.0%	0	0.0%	4	19.0%	446	16.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**21**	**100.0%**	**2,668**	**100.0%**	**21**	**100.0%**	**2,668**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	1	7.7%	160	9.1%
Moderate	2	15.4%	125	7.1%	1	7.7%	64	3.7%
Middle	8	61.5%	1,004	57.3%	2	15.4%	126	7.2%
Upper	3	23.1%	622	35.5%	8	61.5%	1,177	67.2%
Unknown	0	0.0%	0	0.0%	1	7.7%	224	12.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,751**	**100.0%**	**13**	**100.0%**	**1,751**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	22.2%	161	24.1%	1	11.1%	95	14.2%
Middle	4	44.4%	218	32.6%	1	11.1%	100	14.9%
Upper	3	33.3%	290	43.3%	5	55.6%	313	46.8%
Unknown	0	0.0%	0	0.0%	2	22.2%	161	24.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**669**	**100.0%**	**9**	**100.0%**	**669**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	110	4.8%	0	0.0%	0	0.0%
Middle	4	80.0%	2,174	95.2%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	2,284	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**2,284**	**100.0%**	**5**	**100.0%**	**2,284**	**100.0%**
	HMDA Totals							
Low	1	2.1%	295	4.0%	2	4.2%	270	3.7%
Moderate	10	20.8%	726	9.8%	3	6.3%	236	3.2%
Middle	25	52.1%	4,241	57.5%	7	14.6%	538	7.3%
Upper	12	25.0%	2,110	28.6%	24	50.0%	3,213	43.6%
Unknown	0	0.0%	0	0.0%	12	25.0%	3,115	42.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**48**	**100.0%**	**7,372**	**100.0%**	**48**	**100.0%**	**7,372**	**100.0%**

2016 HMDA LOAN DISTRIBUTION TABLE

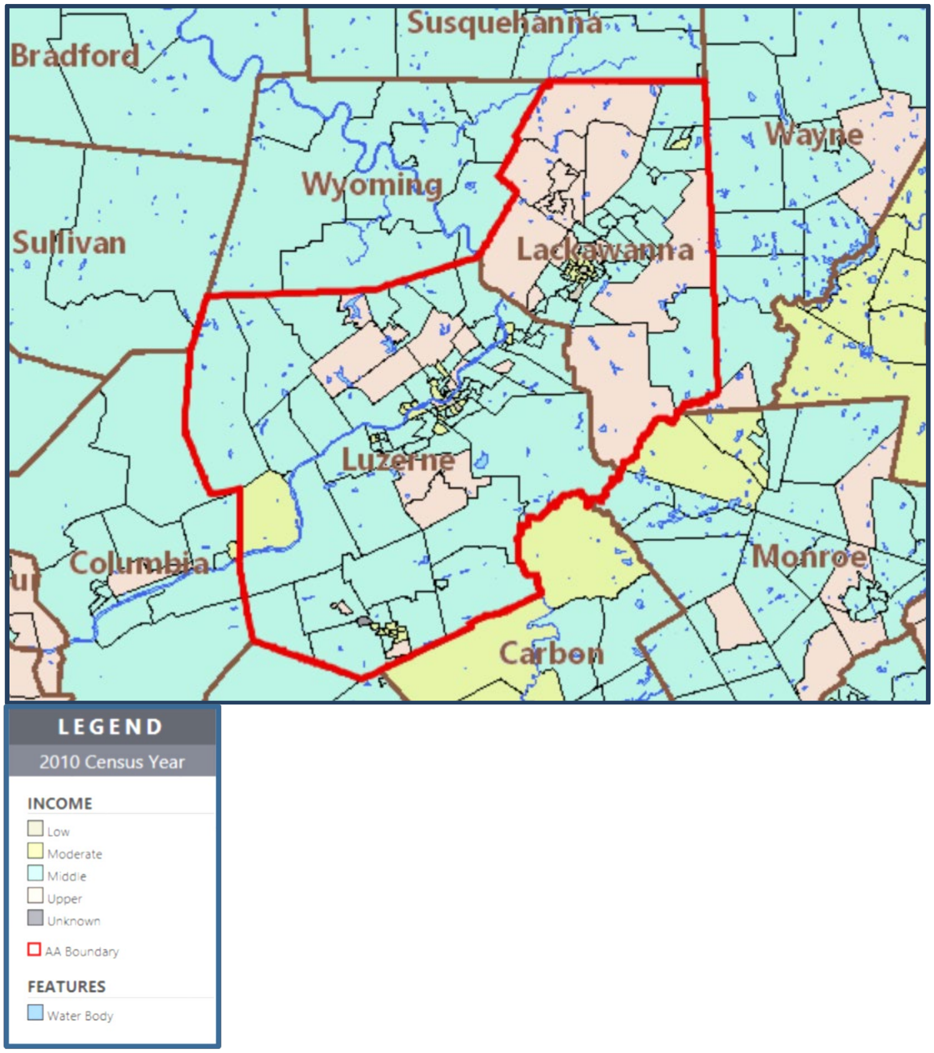
Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	3	7.3%	158	2.8%
Moderate	1	2.4%	50	0.9%	9	22.0%	430	7.6%
Middle	31	75.6%	4,221	74.6%	4	9.8%	589	10.4%
Upper	9	22.0%	1,390	24.6%	17	41.5%	3,733	65.9%
Unknown	0	0.0%	0	0.0%	8	19.5%	751	13.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**41**	**100.0%**	**5,661**	**100.0%**	**41**	**100.0%**	**5,661**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	17.9%	311	8.0%	0	0.0%	0	0.0%
Middle	19	67.9%	2,774	71.5%	4	14.3%	643	16.6%
Upper	4	14.3%	795	20.5%	19	67.9%	2,403	61.9%
Unknown	0	0.0%	0	0.0%	5	17.9%	834	21.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**28**	**100.0%**	**3,880**	**100.0%**	**28**	**100.0%**	**3,880**	**100.0%**
	Home Improvement							
Low	1	20.0%	115	42.9%	1	20.0%	50	18.7%
Moderate	1	20.0%	15	5.6%	0	0.0%	0	0.0%
Middle	3	60.0%	138	51.5%	1	20.0%	15	5.6%
Upper	0	0.0%	0	0.0%	3	60.0%	203	75.7%
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%**	**268**	**100.0%**	**5**	**100.0%**	**268**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	40.0%	214	30.2%	0	0.0%	0	0.0%
Middle	2	40.0%	79	11.1%	0	0.0%	0	0.0%
Upper	1	20.0%	416	58.7%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	709	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**709**	**100.0%**	**5**	**100.0%**	**709**	**100.0%**
	HMDA Totals							
Low	1	1.3%	115	1.1%	4	5.1%	208	2.0%
Moderate	9	11.4%	590	5.6%	9	11.4%	430	4.1%
Middle	55	69.6%	7,212	68.6%	9	11.4%	1,247	11.9%
Upper	14	17.7%	2,601	24.7%	39	49.4%	6,339	60.3%
Unknown	0	0.0%	0	0.0%	18	22.8%	2,294	21.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**79**	**100.0%**	**10,518**	**100.0%**	**79**	**100.0%**	**10,518**	**100.0%**

2017 HMDA LOAN DISTRIBUTION TABLE

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	1	3.6%	57	1.4%	0	0.0%	0	0.0%
Moderate	7	25.0%	796	19.6%	4	14.3%	337	8.3%
Middle	15	53.6%	2,284	56.3%	8	28.6%	627	15.5%
Upper	5	17.9%	918	22.6%	11	39.3%	2,303	56.8%
Unknown	0	0.0%	0	0.0%	5	17.9%	788	19.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**28**	**100.0%**	**4,055**	**100.0%**	**28**	**100.0%**	**4,055**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	33.3%	419	24.7%	1	8.3%	109	6.4%
Middle	4	33.3%	497	29.4%	1	8.3%	146	8.6%
Upper	4	33.3%	777	45.9%	8	66.7%	981	57.9%
Unknown	0	0.0%	0	0.0%	2	16.7%	457	27.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**1,693**	**100.0%**	**12**	**100.0%**	**1,693**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	28.6%	97	33.9%	1	14.3%	21	7.3%
Middle	5	71.4%	189	66.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	6	85.7%	265	92.7%
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%**	**286**	**100.0%**	**7**	**100.0%**	**286**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	66.7%	229	36.4%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	33.3%	400	63.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	629	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**629**	**100.0%**	**3**	**100.0%**	**629**	**100.0%**
	HMDA Totals							
Low	1	2.0%	57	0.9%	0	0.0%	0	0.0%
Moderate	15	30.0%	1,541	23.1%	6	12.0%	467	7.0%
Middle	24	48.0%	2,970	44.6%	9	18.0%	773	11.6%
Upper	10	20.0%	2,095	31.4%	25	50.0%	3,549	53.3%
Unknown	0	0.0%	0	0.0%	10	20.0%	1,874	28.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**50**	**100.0%**	**6,663**	**100.0%**	**50**	**100.0%**	**6,663**	**100.0%**

CRA APPENDIX D: ASSESSMENT AREA MAPS

2010 CENSUS DATA



2015 ACS DATA