PUBLIC DISCLOSURE

Date of Evaluation: **SEPTEMBER 24, 2018**

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Depository Institution: **JIM THORPE NEIGHBORHOOD BANK**

Institution's Identification Number: **920210**

Address: **12 BROADWAY**

JIM THORPE, PENNSYLVANIA

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

INSTITUTION'S CRA RATING: This institution is rated satisfactory.

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

- 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 in the bank's assessment area.
- The distribution of borrowers, given the demographics of the assessment area, reflects reasonable penetration among individuals of different income levels, including low- and moderate-income borrowers.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.

SCOPE OF EXAMINATION

Jim Thorpe Neighborhood Bank (Jim Thorpe) was rated satisfactory at its previous CRA evaluation dated June 17, 2014, which was conducted using the Interagency Small Institution CRA Examination Procedures adopted by the Board of Governors. The current evaluation of Jim Thorpe's CRA performance covers the period from June 18, 2014 through September 24, 2018, and uses the Small Institution CRA Examination Procedures.

The CRA evaluation 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 incomes, including low- and moderate-income borrowers and businesses of different sizes;
- the geographic distribution of loans within the assessment area, including lending in low- and moderate-income census tracts; and
- the bank's response to CRA complaints.

The loan products evaluated consisted of:

- Home-purchase, home-improvement and multifamily loans and the refinancing of such loans, collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar years 2014, 2015, 2016, and 2017; and

- A sample of 50 small business loans originated by the bank during calendar years 2016 and 2017.

Jim Thorpe is a HMDA reporter, and therefore the bank's HMDA performance was compared to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to the HMDA. As this evaluation spans four years, for purposes of evaluating the geographic distribution of loans, census tracts were classified on the basis of the 2010 U.S. Census data for loans made in 2014, 2015, and 2016, and on the basis of the updated 2015 American Community Survey (ACS) data for loans originated in 2017.[1] The distribution of HMDA loans to borrowers of different income levels was analyzed 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 2010 Census data for years 2014, 2015, and 2016, and updated 2015 ACS data for 2017, unless otherwise noted.

Jim Thorpe does not report small business loans for purposes of the CRA, and therefore analysis of the bank's small business lending is based on a statistical sample of 50 commercial loans made in 2016 and 2017. For small business loans, examiners compared the bank's lending to Dun & Bradstreet data. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses. Because Jim Thorpe is not a small business reporter, it is not included in the ranking of aggregate lenders who report such loans in Carbon and Schuylkill Counties. Consequently, the bank's performance was not directly compared to the lending of aggregate small business lenders. Conversely, aggregate lending data was considered for contextual purposes only.

Due to the volume by number and dollar amount, HMDA loans were given the most weight in determining the bank's overall performance, followed by small business loans. During the evaluation period, Jim Thorpe originated 280 HMDA loans totaling nearly $25 million in its assessment area.

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

To supplement economic, demographic and performance data, examiners also conducted two community contacts within the bank's assessment area. Discussions were held with an economic development agency and a local government agency.

DESCRIPTION OF INSTITUTION

Jim Thorpe is a state-chartered, full-service commercial bank headquartered in Jim Thorpe, Carbon County, Pennsylvania. The institution offers a variety of consumer and commercial banking services, through six branch offices all located within Carbon County in northeastern Pennsylvania. The bank is a wholly-owned subsidiary of JTNB Bancorp, Inc., a bank holding company, also located in Jim Thorpe, PA, with assets of $192 million as of June 30, 2018.

[1] In accordance with a FFIEC policy decision, 2015 American Community Survey data is not used to analyse loans originated in 2015 or 2016.

According to the Consolidated Reports of Condition and Income (Call Report), as of June 30, 2018, Jim Thorpe reported $192 million in assets, of which $94 million, or 49%, were loans. On a dollar volume basis, residential real estate loans, which include open- and closed-end mortgages, were the most significant credit product offered by the bank and comprised 57% ($53 million) of the bank's loan portfolio. Commercial loans, which include commercial mortgages and commercial and industrial loans, were the second largest segment of the bank's loan portfolio at $30 million, or 32%, of the bank's loan portfolio.

The composition of the bank's loan portfolio as of June 30, 2018 is presented in the following table.

LOANS as of 06/30/2018	**$000**	**%**
Construction & Land Development	628	0.7
Secured by Residential Properties (Open-end)	2,753	2.9
Secured by Residential Properties (Closed-end)	50,599	53.6
Multifamily Residential Properties	258	0.3
Commercial Mortgages	28,057	29.7
Commercial and Industrial Loans	2,219	2.3
Consumer Loans	1,014	1.1
Obligations of States and Political Subdivisions	8,871	9.4
TOTAL	**$94,399**	**100.0%**

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report as of June 30, 2018 indicates that 86% of Jim Thorpe's commercial loans were designated as small business loans, as detailed in the following chart. Jim Thorpe had no loans secured by farmland, loans to finance agricultural production, or other loans to farmers.

JIM THORPE NEIGHBORHOOD BANK COMMERCIAL LOAN PORTFOLIO		
	AMOUNT OUTSTANDING AS OF 6/30/2018 ($000)	**PERCENT**
Loans with original amounts of $100,000 or less	3,213	10.6
Loans with original amounts of more than $100,000 through $250,000	8,312	27.5
Loans with original amounts of more than $250,000 through $1,000,000	14,486	47.8
TOTAL SMALL BUSINESS LOANS	**26,011**	**85.9**
Loans with original amounts of more than $1,000,000	4,265	14.1
TOTAL COMMERCIAL LOANS	**30,276**	**100.0%**

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

DESCRIPTION OF ASSESSMENT AREA

For purposes of the CRA, Jim Thorpe has designated its single assessment area to include all of Carbon County, PA, and five census tracts in adjacent Schuylkill County (collectively referred to as the Carbon County assessment area or the assessment area). The bank's assessment area complies with the requirements of the CRA and does not arbitrarily exclude low- or moderate-income census tracts.

As mentioned previously, discussions were held with two community organizations (an economic development agency and a local government agency) to provide perspective on the credit needs of the assessment area. The most frequently mentioned credit need was home-improvement loans given the area's older housing stock, which is in need of rehabilitation. One community contact mentioned the need for workforce development programs to help address the current mismatch between employers and assessment area residents, who tend to leave the county for higher paying employment in neighboring Lehigh and Northampton counties. Finally, it was noted that area small businesses may benefit from business consulting services, as many struggle to create business plans and perform financial analysis.

2010 Census Data

According to 2010 Census data, the assessment area consists of a total of 17 census tracts, of which nine were moderate-income and eight were middle-income. There were no low-income or upper-income census tracts. Fifty percent of the assessment area population resided in the moderate-income census tracts and 50% resided in the middle-income census tracts. The moderate-income census tracts were largely in the northern and western parts of the Carbon County assessment area, and include the following townships: Banks, Coaldale, Jim Thorpe, Kidder, Lausanne, Lehigh, Lehighton, Nesquehoning, Packer, Palmerton, Summit Hill, and Weatherly.

2015 ACS Data

According to the updated 2015 ACS data, the number of census tracts in the assessment area remained at 17. However, census tract income designations changed substantially from the 2010 Census. Specifically, under the 2015 ACS, the assessment area now contains one low-income census tract, six moderate-income census tracts, nine middle-income census tracts, and one upper-income census tract. Five percent of the assessment area's population resides in the low-income census tract, which consists of Lansford Township, 31% of the population resided in moderate-income census tracts, 58% resided in middle-income tracts, and the remaining 6% resided in the upper-income tract.

Similar to the 2010 Census, the moderate-income census tracts were largely located in the northern and western parts of the Carbon County assessment area and include the following townships: Banks, Coaldale, Lausanne, Lehigh, McAdoo, Packer, a portion of Penn Forest, and Weatherly.

The census tracts that included the townships of Kidder, Jim Thorpe, and Nesquehoning changed from moderate-income to middle-income as a result of the 2015 ACS. Finally, the census tract in Schuylkill County that contained the townships of Kline, Delano, and Rush changed from middle-income to upper-income.

Maps of the Carbon County assessment area at both the 2010 Census and the 2015 ACS are available in Appendix D. Jim Thorpe's CRA performance was evaluated in terms of the demographic and economic context in which the bank operates. According the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits report, as of June 30, 2017,[2] there are nine depository institutions operating 24 branches in Carbon County, PA. These branches hold $995 million in deposits, with Jim Thorpe ranked third with slightly less than $160 million in deposits, or 16% of the deposit market share. Mauch Chunk Trust Company ranks first with 28% of the deposit market share, and First Northern Bank & Trust Company ranked second with 16%.

Jim Thorpe's home-mortgage lending was compared to the aggregate of all lenders in the Carbon County assessment area reporting real estate loans pursuant to the HMDA.[3] These data are reported annually, and 2017 is the most recent year for which aggregate data is available. In 2017, a total of 231 institutions reported 2,177 HMDA loan originations and purchases within the assessment area. Data show that Wells Fargo Bank, N.A. was the largest HMDA loan originator in the assessment area with 9% of all loan originations and purchases. Mauch Chunk Trust Company ranked second with 6% of the market, and Quicken Loans ranked third with 5% of the market. Jim Thorpe tied for sixth, with 3%. It should be noted that Jim Thorpe originated 66 loans, while many of the national banks, including those mentioned above, purchased some of their loans within the assessment area. For example, of the 197 loans that were reported by Wells Fargo Bank, N.A., more than half (101 loans) were purchased from other lenders.

Though Jim Thorpe is not a CRA small business reporter due to its asset size, information on the small business lending market share is presented for context only. In 2017, 57 small business lenders reported a total of 1,006 small business originations and purchases in the Carbon County assessment area. Large banks who offer credit cards were the market leaders, and no local banks ranked in the top ten small business lenders in the market. American Express Bank, FSB ranked first with 15% of the small business loan market, followed by Synchrony Bank with 10%, and PNC Bank, N.A. with 9% of the market.

ECONOMIC CHARACTERISTICS

Jim Thorpe's performance under the CRA was evaluated in terms of the demographic and business context in which the bank operates. As mentioned previously, the bank's Carbon County assessment area consists of all of Carbon County and five census tracts in adjacent Schuylkill County. Although Carbon County is part of the Allentown-Bethlehem-Easton, PA MSA, it is significantly more rural than the other three counties that make up the MSA.

[2] June 30, 2017 is the most recent date for which FDIC deposit data is available.

[3] Home-purchase and home-improvement loans, and the refinancing of such loans are reported pursuant to the HMDA and these reported loans are collectively titled HMDA loans.

According to Moody's Analytics Precis Report for the entire Allentown-Bethlehem-Easton, PA MSA, the MSA's economy is in an expansionary mode with transportation and warehousing representing an important driver for employment in the area. Strengths of the MSA's economy include the area's proximity to the more expensive New York City and Philadelphia metro divisions and below average employment volatility. Weaknesses in the MSA include weak local government finances, an aging infrastructure, an aging population, coupled with a weak migration pattern.

Carbon County is somewhat removed, both economically and geographically, from the cities of Allentown and Bethlehem, which are the largest drivers of the overall MSA's economic conditions. According to a community contact, the wages in neighboring Lehigh and Northampton Counties are typically higher than they are in Carbon County and, as a result, Carbon County residents often commute to those counties for work. Because they are both significantly more rural, Carbon and Schuylkill counties share similar economic characteristics. Over two-thirds of the county is state game land and state park land.

According to the Pennsylvania Department of Labor & Industry, top employers in Carbon County include Blue Mountain Resort, Gnaden Huetten Memorial Hospital, JFBB Ski Areas, Inc., and Kovatch Mobile Equipment Corp. Top industries include healthcare and social services, retail trade, accommodation and food services, and manufacturing.

Seasonally unadjusted unemployment rates for Carbon and Schuylkill Counties, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table. As seen in the table below, unemployment rates in Carbon and Schuylkill Counties, the Allentown-Bethlehem-Easton, PA MSA, the state, and the country as whole, decreased during the evaluation period. However, the unemployment rates for Carbon and Schuylkill Counties throughout the evaluation period have remained higher than the MSA, Commonwealth, and nation as a whole.

Jim Thorpe Neighborhood Bank Unemployment Rates (Seasonally Unadjusted)				
Geographical Area	**2014 Annual**	**2015 Annual**	**2016 Annual**	**2017 Annual**
Carbon County	7.1	6.1	6.0	5.6
Schuylkill County	7.1	6.3	6.2	5.9
Allentown-Bethlehem-Easton, PA MSA	6.1	5.4	5.2	4.9
Pennsylvania	5.9	5.3	5.4	4.9
United States	6.2	5.3	4.9	4.4

HOUSING

2010 Census Data

According to 2010 Census data, the Carbon County assessment area had 42,404 housing units, 63% of which were owner-occupied, 17% of which were rental units, and 20% of which were vacant. Vacant homes include those that are occupied by persons who have a primary residence elsewhere (i.e., vacation homes). Single family units comprised 86% of the assessment area's housing units, two-to-four family units comprised 6%, multifamily units comprised 5%, and mobile homes comprised almost 4%.

The amount of owner-occupied housing within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to the 2010 Census, 48% of owner-occupied housing was located in the assessment area's moderate-income census tracts, and 53% in the middle-income census tracts.

According to the 2010 Census, the median age of housing stock in the assessment area was 54 years, compared to 50 years in Pennsylvania generally. Of note, the median age of housing stock was significantly older in the assessment area's moderate-income tracts (61 years) than in the middle-income census tracts (35 years). The median housing value in the assessment area was $123,370, which was lower than the median housing value for the Commonwealth overall ($159,300). The median housing value in the assessment area's moderate-income census tracts was $93,163, which is significantly lower than the median housing value in middle-income census tracts ($156,183).

Median gross rent (rent plus utilities) in the assessment area was $623, significantly lower than the Commonwealth's median gross rent of $739. However, the percentage of renters paying more than 30% of their income for rent in the assessment area matched that of Pennsylvania as a whole at 44%.

2015 ACS Data

According to 2015 ACS data, the Carbon County assessment area had 42,740 housing units, 59% of which were owner-occupied, 18% of which were rental units, and 23% of which were vacant. Vacant homes include those that are occupied by persons who have a primary residence elsewhere (i.e., vacation homes). Single family units comprised 86% of the assessment area's housing units, two-to-four family units comprised 6%, multifamily units comprised 5%, and mobile homes comprised 3%.

The amount of owner-occupied housing within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such census tracts. As the result of census tract shifts, the distribution of owner-occupied housing in the assessment area changed notably using 2015 ACS data. According to the updated 2015 ACS data, 4% of owner-occupied housing was located in the assessment area's low-income census tract, 29% in the moderate-income census tracts, 59% in the middle-income census tracts, and 8% in the upper-income census tract.

According to the 2015 ACS data, the median age of housing stock in the assessment area was 60 years, compared to 54 years in Pennsylvania generally. The median age of housing stock in the assessment area's low and moderate-income tracts was 61 years, while in the middle-income census tracts it was 53 years. The median housing value in the assessment area was $127,666, which was lower than the median housing value for the Commonwealth overall ($166,000), and for the Allentown-Bethlehem-Easton, PA MSA as a whole, which was nearly $200,000.

A significant difference in median housing values exists between census tracts. More specifically, the median housing value in the assessment area's low-income census tract was $47,473, which is significantly lower than the median housing value in the moderate-income census tracts ($104,571) and the median housing value in middle-income census tracts ($151,717). Interestingly, the median housing value in the assessment area's upper-income census tract ($132,392) was below that in middle-income tracts.

Median gross rent in the assessment area was $726, which was lower than the Commonwealth's median gross rent of $840. The percentage of renters paying more than 30% of their income on rent was slightly lower in the assessment area than in Pennsylvania (44% and 46%, respectively).

BORROWER INCOME DATA

2010 Census Data

The percentage of low- and moderate-income families is used as a proxy to estimate demand for home-mortgage lending in the assessment area. According to the 2010 Census, of the 22,859 families in the assessment area, 25% are designated as low-income, 24% are designated as moderate-income, 24% are middle-income, and 28% are upper-income. Families living below the poverty level represented 9% of families in the assessment area, similar to the Commonwealth's level.

2015 ACS Data

According to the updated 2015 ACS data, of the 21,825 families in the assessment area, 25% of families in the assessment area are designated as low-income, 23% are designated as moderate-income, 23% are middle-income, and 30% are upper-income. According to the 2015 ACS data, 8% of assessment area families are living below the poverty level, which is just below the statewide level of 9%.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the Department of Housing and Urban Development's (HUD) annually adjusted median family income data made available by the FFIEC for the Allentown-Bethlehem-Easton, PA MSA. Median family incomes for 2014 through 2017 are listed in the table below, and are categorized by 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	$68,800	Less than $34,400	$34,400 - $55,039	$55,040 - $82,559	$82,560 or more
2015	$71,200	Less than $35,600	$35,600 – $56,959	$56,960 - $85,439	$85,440 or more
2016	$70,900	Less than $35,450	$35,450 - $56,719	$56,720 - $85,079	$85,080 or more
2017	$75,200	Less than $37,600	$37,600 - $60,159	$60,160 - $90,239	$90,240 or more

GEOGRAPHIC BUSINESS DATA

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for small business credit within such tracts. According to Dun and Bradstreet, in 2014, there were 3,137 businesses located in the bank's assessment area. Of these, 53% were located in moderate-income census tracts and 47% were located in middle-income census tracts. Business demographics also revealed that of the 3,137 businesses, 89% were small businesses with gross annual revenues of $1 million or less.

In 2015, there were 3,315 businesses located in the bank's assessment area. Of these, 51% were located in moderate-income census tracts and 49% were located in middle-income census tracts. Business demographics revealed that of the 3,315 businesses, 92% were small businesses with gross annual revenues of $1 million or less.

In 2016, there were 2,973 businesses located in the bank's assessment area. Of these, 51% again were located in moderate-income census tracts and 49% were located in middle-income census tracts. Business demographics revealed that of the 2,973 businesses, 91% were small businesses with gross annual revenues of $1 million or less.

As a result of 2015 ACS changes, the geographic profile of businesses within the assessment area changed significantly, with far more businesses located in the assessment area's middle-income census tracts. In 2017, there were 2,662 businesses located in the assessment area. Of these, 4% were located in the assessment area's low-income census tract and 28% were located in moderate-income census tracts. The majority of businesses were located in middle-income (63%) and upper-income (7%) census tracts.

The demographics used to assess the performance context in which Jim Thorpe operated are detailed in the tables on the following pages. As mentioned, 2010 U.S. Census data is used for 2014, 2015, and 2016, and the updated 2015 ACS data is used for demographic comparison in 2017.

Jim Thorpe Neighborhood 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	0	0.0	0	0.0	0	0.0	5,665	24.8
Moderate-income	9	52.9	11,072	48.4	1,334	12.0	5,422	23.7
Middle-income	8	47.1	11,787	51.6	816	6.9	5,440	23.8
Upper-income	0	0.0	0	0.0	0	0.0	6,332	27.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**17**	**100.0**	**22,859**	**100.0**	**2,150**	**9.4**	**22,859**	**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	21,286	12,632	47.5	59.3	4,819	22.6	3,835	18.0
Middle-income	21,118	13,973	52.5	66.2	2,386	11.3	4,759	22.5
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	**42,404**	**26,605**	**100.0**	**62.7**	**7,205**	**17.0**	**8,594**	**20.3**
	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	1,658	52.9	1,464	52.2	90	54.9	104	61.2
Middle-income	1,479	47.1	1,339	47.8	74	45.1	66	38.8
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	**3,137**	**100.0**	**2,803**	**100.0**	**164**	**100.0**	**170**	**100.0**
	Percentage of Total Businesses:			**89.4**		**5.2**		**5.4**

Based on 2010 Census Information.

Jim Thorpe Neighborhood 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	0	0.0	0	0.0	0	0.0	5,665	24.8
Moderate-income	9	52.9	11,072	48.4	1,334	12.0	5,422	23.7
Middle-income	8	47.1	11,787	51.6	816	6.9	5,440	23.8
Upper-income	0	0.0	0	0.0	0	0.0	6,332	27.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**17**	**100.0**	**22,859**	**100.0**	**2,150**	**9.4**	**22,859**	**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	21,286	12,632	47.5	59.3	4,819	22.6	3,835	18.0
Middle-income	21,118	13,973	52.5	66.2	2,386	11.3	4,759	22.5
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	**42,404**	**26,605**	**100.0**	**62.7**	**7,205**	**17.0**	**8,594**	**20.3**
	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	1,679	50.6	1,528	50.0	106	57.9	45	59.2
Middle-income	1,636	49.4	1,528	50.0	77	42.1	31	40.8
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	**3,315**	**100.0**	**3,056**	**100.0**	**183**	**100.0**	**76**	**100.0**
	Percentage of Total Businesses:			**92.2**		**5.5**		**2.3**

Based on 2010 Census Information.

Jim Thorpe Neighborhood 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	0	0.0	0	0.0	0	0.0	5,665	24.8
Moderate-income	9	52.9	11,072	48.4	1,334	12.0	5,422	23.7
Middle-income	8	47.1	11,787	51.6	816	6.9	5,440	23.8
Upper-income	0	0.0	0	0.0	0	0.0	6,332	27.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**17**	**100.0**	**22,859**	**100.0**	**2,150**	**9.4**	**22,859**	**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	21,286	12,632	47.5	59.3	4,819	22.6	3,835	18.0
Middle-income	21,118	13,973	52.5	66.2	2,386	11.3	4,759	22.5
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	**42,404**	**26,605**	**100.0**	**62.7**	**7,205**	**17.0**	**8,594**	**20.3**
	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	1,503	50.6	1,344	49.8	111	58.1	48	57.1
Middle-income	1,470	49.4	1,354	50.2	80	41.9	36	42.9
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	**2,973**	**100.0**	**2,698**	**100.0**	**191**	**100.0**	**84**	**100.0**
	Percentage of Total Businesses:			**90.8**		**6.4**		**2.8**

Based on 2010 Census Information.

Jim Thorpe Neighborhood 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	1	5.9	898	4.1	175	19.5	5,396	24.7
Moderate-income	6	35.3	6,576	30.1	683	10.4	4,928	22.6
Middle-income	9	52.9	12,747	58.4	891	7.0	4,928	22.6
Upper-income	1	5.9	1,604	7.3	24	1.5	6,573	30.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**17**	**100.0**	**21,825**	**100.0**	**1,773**	**8.1**	**21,825**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	2,147	1,051	4.2	49.0	584	27.2	512	23.8
Moderate-income	14,457	7,245	28.9	50.1	3,336	23.1	3,876	26.8
Middle-income	23,549	14,868	59.3	63.1	3,607	15.3	5,074	21.5
Upper-income	2,587	1,911	7.6	73.9	249	9.6	427	16.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**42,740**	**25,075**	**100.0**	**58.7**	**7,776**	**18.2**	**9,889**	**23.1**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	95	3.6	87	3.6	4	2.1	4	5.6
Moderate-income	732	27.5	663	27.6	46	24.5	23	32.4
Middle-income	1,663	62.5	1,504	62.6	120	63.8	39	54.9
Upper-income	172	6.5	149	6.2	18	9.6	5	7.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**2,662**	**100.0**	**2,403**	**100.0**	**188**	**100.0**	**71**	**100.0**
	Percentage of Total Businesses:			**90.3**		**7.1**		**2.7**

Based on 2015 ACS Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LOAN-TO-DEPOSIT RATIO

Jim Thorpe's loan-to-deposit ratio is reasonable, given the bank's asset size, financial condition and assessment area credit needs. A financial institution's loan-to-deposit ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend. The average loan-to-deposit ratio is derived by adding the quarterly loan-to-deposit ratios and dividing the total by the number of quarters for a given period.

Jim Thorpe's average loan-to-deposit ratio measured 48% over the past 17 quarters of operation, which represents a decrease from a ratio of 58% at the bank's previous CRA evaluation. The loan-to-deposit ratio is below the peer group average of 77%.[4]

As seen in the table below, the bank's loan-to-deposit ratio varied during the evaluation period. In absolute terms, the bank's net loan volume increased 20% over the evaluation period, from $78 million, as of June 30, 2014, to $94 million, as of June 30, 2018. During the same time frame, deposits increased, but at a much lower level. More specifically, deposits increased by nearly 7%, from $151 million to $161 million.

Although the bank's loan-to-deposit ratio has decreased since the last evaluation and is lower than the national peer loan-to-deposit ratio of 77%, it is still considered to be reasonable when factoring in assessment area loan demand and competition. As noted previously, the bank operates in a rural market with limited lending opportunities and substantial competition. Indeed, between 2013 (the latest year for which aggregate lending data was available during the previous CRA evaluation), and 2017 (the latest year for which aggregate lending data was available during the current CRA evaluation), institutions reporting HMDA activity in the assessment area increased 17%, from 198 institutions to 231 institutions. Over the same period, however, total HMDA lending activity decreased 15% from a total of 2,561 HMDA loans to a total of 2,177 HMDA loans.

The table on the following page shows Jim Thorpe's quarterly loan-to-deposit ratio for the 17 quarter period since the previous CRA evaluation, together with the average ratio for the same period.

[4] Jim Thorpe's peer group consists of all insured commercial banks having assets between $100 million and $300 million, with 3 or more full service banking offices and located in a metropolitan statistical area.

Jim Thorpe Neighborhood Bank Historical Loan-to-Deposit Ratios			
As of Date	**Net Loans (Thousands)**	**Total Deposits (Thousands)**	**LTD Ratios**
06/30/2014	77,693	150,555	51.60
09/30/2014	77,458	155,750	49.73
12/31/2014	77,976	164,889	47.29
03/31/2015	77,978	156,195	49.92
06/30/2015	77,249	151,447	51.01
09/30/2015	75,773	165,410	45.81
12/31/2015	75,307	170,637	44.13
03/31/2016	73,928	172,757	42.79
06/30/2016	73,790	164,493	44.86
09/30/2016	74,600	167,356	44.58
12/31/2016	77,825	175,687	44.30
03/31/2017	77,906	173,817	44.82
06/30/2017	79,651	159,584	49.91
09/30/2017	84,217	171,913	48.99
12/31/2017	84,650	171,099	49.47
03/31/2018	87,538	160,951	54.39
06/30/2018	93,503	160,507	58.25
Quarterly Loan-to-Deposit Ratio Average Since Previous Evaluation			48.34

ASSESSMENT AREA CONCENTRATION

A majority of Jim Thorpe's loans and other lending-related activities are in the bank's assessment area.

Jim Thorpe's home-mortgage and small business lending was analyzed to determine the volume of loans extended inside and outside of the bank's assessment area as delineated for purposes of the CRA. During the evaluation period, 86% of the total number of HMDA loans reported, and 72% of the aggregate dollar amount of HMDA loans reported were extended in the bank's assessment area.

With respect to small business loans, 76% of the number of small business loans sampled were extended within the bank's assessment area, while nearly 70% of the dollar amount of small business loans sampled were extended in the bank's assessment area.

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

Jim Thorpe Neighborhood Bank Lending Inside and Outside the Assessment Area								
Loan Type	**Inside**				**Outside**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
Home Improvement	113	95.0	$7,234	90.1	6	5.0	$799	9.9
Home Purchase - Conventional	88	81.5	$9,499	72.2	20	18.5	$3,663	27.8
Multifamily Housing	3	21.4	$387	10.3	11	78.6	$3,387	89.7
Refinancing	76	88.4	$7,409	83.2	10	11.6	$1,491	16.8
Total HMDA related	**280**	**85.6**	**$24,529**	**72.4**	**47**	**14.4**	**$9,340**	**27.6**
Small Business	38	76.0	$5,720	69.8	12	24.0	$2,469	30.2
Total Small Business related	**38**	**76.0**	**$5,720**	**69.8**	**12**	**24.0**	**$2,469**	**30.2**
TOTAL LOANS	**318**	**84.4**	**$30,249**	**71.9**	**59**	**15.6**	**$11,809**	**28.1**

DISTRIBUTION OF LOANS BY BORROWER INCOME LEVEL AND REVENUE SIZE OF BUSINESS

An analysis of home-mortgage loans and small business 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 borrowers of different income levels and businesses of different sizes.[5] As mentioned previously, Jim Thorpe did not originate a substantial volume of small business loans over the evaluation period. Accordingly, HMDA lending was weighted more heavily than small business lending in the CRA analysis.

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

<u>Home-Mortgage Lending</u>

Jim Thorpe's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is reasonable. Over the evaluation period, Jim Thorpe originated 280 home-mortgage loans in its assessment area, totaling slightly less than $25 million.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon HUD's annually-adjusted median family income data. Further, the respective percentages of low- and moderate-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, 25% of assessment area families were categorized as low-income and 24% were categorized as moderate-income. Similarly, according to the updated 2015 ACS data, 25% of assessment area families were categorized as low-income and 23% were categorized as moderate-income.

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

Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for home-mortgage credit is among low- and moderate-income families and individuals within the assessment area. Approximately 48% of families in the assessment area were designated as low- or moderate-income, indicating a significant need for home-mortgage credit among this segment of the population.

The following tables compare Jim Thorpe's 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 first table, used to evaluate lending in 2014, 2015 and 2016, relies on 2010 Census data to estimate demand for home-mortgage credit among low- and moderate-income families. The second table, used to evaluate 2017 lending relies on updated 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families.

Jim Thorpe Neighborhood Bank
Distribution of HMDA Loans by Borrower Income Level (2014 – 2016)

Income Level	% Families by Family Income Level	Aggregate Comparison					
		2014		2015		2016	
		% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending
Low	24.8	18.7	11.2	12.5	9.6	11.9	11.2
Moderate	23.7	18.7	21.0	26.3	20.7	23.7	20.8
Middle	23.8	29.3	22.1	16.3	21.4	30.5	21.7
Upper	27.7	32.0	30.0	37.5	28.4	28.8	27.7
Unknown	0.0	1.3	15.7	7.5	19.9	5.1	18.6
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Jim Thorpe Neighborhood Bank
Distribution of HMDA Loans by Borrower Income Level (2017)

Income Level	% Families by Family Income Level	Aggregate Comparison	
		2017	
		% Jim Thorpe Lending	% Aggregate Lending
Low	24.7	12.1	10.8
Moderate	22.6	24.2	22.7
Middle	22.6	25.8	20.1
Upper	30.1	33.3	28.7
Unknown	0.0	4.5	17.6
Total	**100%**	**100%**	**100%**

Lending to Low-Income Borrowers

For the period under review, Jim Thorpe's lending to low-income borrowers was reasonable.

2010 Census Data

Jim Thorpe's lending in 2014, 2015, and 2016 to low-income borrowers was reasonable. According to 2010 Census data, 25% of families within the assessment area were categorized as low-income.

Jim Thorpe's lending in 2014 to low-income borrowers was reasonable. In total, 19% of the bank's HMDA loans were originated to low-income borrowers, as compared to the aggregate lending level of 11%, and proxy of 25%. An analysis of the bank's home-mortgage lending to low-income borrowers by product type shows that Jim Thorpe originated 13% of its home-purchase loans, 26% of its refinance loans, and 18% of its home-improvement loans to low-income borrowers. The bank exceeded aggregate lending levels of 11% for home-purchase loans, 11% for refinance loans, and 12% for home-improvement loans to low-income borrowers.

Jim Thorpe's lending in 2015 to low-income borrowers was reasonable. In total, 13% of the bank's HMDA loans were originated to low-income borrowers, as compared to the aggregate lending level of 10%, and proxy of low-income families (25%). An analysis of the bank's home-mortgage lending to low-income borrowers by product type shows that Jim Thorpe originated 11% of its home-purchase loans, 16% of its refinance loans, and 13% of its home-improvement loans to low-income borrowers. In comparison, aggregate lenders originated 10% of home-purchase loans, 9% of refinance loans, and 10% of home-improvement loans to low-income borrowers.

Jim Thorpe's lending in 2016 to low-income borrowers was reasonable. In total, 12% of the bank's HMDA loans were originated to low-income borrowers, as compared to the aggregate lending level of 11%, and proxy of 25%. By product type, Jim Thorpe originated 20% of its home-purchase loans, 13% of its refinance loans, and 7% of its home-improvement loans to low-income borrowers. In comparison, the bank exceeded aggregate lending levels of 12% for home-purchase loans and 9% for refinance loans, but originated a smaller percentage of home-improvement loans as compared to the aggregate's 13%.

<u>2015 ACS Data</u>

Jim Thorpe's lending in 2017 to low-income borrowers was reasonable.

According to 2015 ACS data, 25% of families within the assessment area were categorized as low-income. In total 12% of the bank's HMDA loans were originated to low-income borrowers, as compared to the aggregate lending level of 11%. By product type, Jim Thorpe originated 14% of its home-purchase loans, 5% of its refinance loans, and 15% of its home-improvement loans to low-income borrowers. In comparison, aggregate lenders originated 10% of home-purchase loans, 11% of refinance loans, and 15% of home-improvement loans to low-income borrowers.

It should be noted that for all four years, both the bank and aggregate lending levels were far below the proxy of 25% for low-income families, indicating limited lending opportunities with low-income borrowers. 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. Indeed, as mentioned previously, 44% of the assessment area's renters spend more than 30% of their income on rent, which makes it difficult, particularly for low-income renters, to save the customary down payment and closing costs necessary to purchase a home.

Lending to Moderate-Income Borrowers

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

2010 Census Data

Jim Thorpe's lending in 2014 was reasonable, while performance in 2015 and 2016 to moderate-income borrowers was excellent. According to 2010 Census data, 24% of families within the assessment area were categorized as moderate-income.

Jim Thorpe's lending in 2014 to moderate-income borrowers was reasonable. In total, 19% of the bank's HMDA loans were originated to moderate-income borrowers, as compared to the aggregate lending level of 21%, and proxy of moderate-income families (24%). An analysis of the bank's home-mortgage lending to moderate-income borrowers by product type shows that in 2014 Jim Thorpe originated 21% of its home-purchase loans, 17% of its refinance loans, and 18% of its home-improvement loans to moderate-income borrowers. In comparison, Jim Thorpe matched the aggregate lending level of 21% for home-purchase loans, but underperformed aggregate lending levels for refinance and home-improvement loans at 20% and 23%, respectively.

Jim Thorpe's lending in 2015 to moderate-income borrowers was excellent. In total, 26% of the bank's HMDA loans were originated to moderate-income borrowers, as compared to the aggregate lending level of 21%. Of note, the bank's lending level to moderate-income borrowers also exceeded the proxy of moderate-income families in the assessment area of 24%. An analysis of the bank's home-mortgage lending to moderate-income borrowers by product type shows that Jim Thorpe originated 36% of its home-purchase loans, 26% of its refinance loans, and 19% of its home-improvement loans to moderate-income borrowers. In comparison, aggregate lenders originated 24% of home-purchase loans, 15% of refinance loans, and 24% of home-improvement loans to moderate-income borrowers.

Jim Thorpe's lending in 2016 to moderate-income borrowers was excellent. In total, 24% of the bank's HMDA loans were originated to moderate-income borrowers, as compared to the aggregate lending level of 21%, and proxy (24%). By product type, Jim Thorpe originated 13% of its home-purchase loans, 13% of its refinance loans, and 36% of its home-improvement loans to moderate-income borrowers. In comparison, aggregate lenders originated 22% of home-purchase loans, 17% of refinance loans, and 25% of home-improvement loans to moderate-income borrowers.

2015 ACS Data

Jim Thorpe's lending in 2017 to moderate-income borrowers was excellent. In total, 24% of the bank's HMDA loans were originated to moderate-income borrowers, as compared to the aggregate lending level of 23%. It is also worth noting that the bank's lending level to moderate-income borrowers also exceeded the proxy of moderate-income families in the assessment area of 23%. By product type, Jim Thorpe originated 24% of its home-purchase loans, 26% of its refinance loans, and 23% of its home-improvement loans to moderate-income borrowers. In comparison, aggregate lenders originated 24% of home-purchase loans, 20% of refinance loans, and 25% of home-improvement loans to moderate-income borrowers.

Small Business Lending

The bank's distribution of loans to businesses reflects reasonable 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 bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to available business data, in 2016, 2,973 businesses operated in the assessment area, with 2,698 (or 91%) designated as small businesses. In 2017, 2,662 businesses operated in the assessment area, with 2,403 (or 90%) designated as small businesses.

As mentioned previously, the performance evaluation measures Jim Thorpe's small business lending performance using a sample of 50 of the bank's small business loans from calendar years 2016 and 2017.

In 2016, Jim Thorpe originated 23 small business loans in its assessment area, aggregating $4.3 million. Of these loans, 74% were originated to small businesses. The bank's lending to small businesses was higher than the aggregate lending level of 48% to small businesses by all lenders in the assessment area, but was lower than 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, thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses.

In 2016, 65% of Jim Thorpe's small business loans were extended in an amount less than $100 thousand. Aggregate lending data for 2016 shows that 95% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2017, Jim Thorpe originated 15 small business loans in its assessment area, aggregating just under $1.4 million. Of these loans, 67% were originated to small businesses. The bank's lending to small businesses was higher than the aggregate lending level of 47% to small businesses by all lenders in the assessment area, but was lower than the proxy of 90%.

In 2017, 87% of Jim Thorpe's small business loans were extended in an amount less than $100 thousand. Aggregate lending data for 2017 shows that 94% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In considering the aggregate data, it should be noted that the data includes loans originated under corporate credit cards for business-related use. The credit card-related loans are generally originated in lower amounts, thereby skewing aggregate small business data. As mentioned previously, American Express Bank, FSB, Synchrony Bank, and Capital One Bank USA, N.A., all large credit card issuers, accounted for 33% of small business loans reported in the assessment area in 2017.

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 reasonable dispersion throughout the assessment area, including low- and moderate-income tracts.

Home-Mortgage Lending

Jim Thorpe's geographic distribution of home mortgages reflects reasonable 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 the 2010 Census data, 48% of owner-occupied housing was located in the assessment area's moderate-income census tracts, and 53% in the middle-income census tracts. According to the updated 2015 ACS data, 4% of owner-occupied housing was located in the assessment area's low-income census tract, 29% in the moderate-income census tracts, 59% in the middle-income census tracts, and 8% in the upper-income census tract.

The following tables present Jim Thorpe's HMDA lending distribution from 2014 through 2017, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The first table, used for lending in 2014, 2015 and 2016 relies on 2010 Census data, while the second table, used for 2017 lending, relies on updated 2015 ACS data.

Jim Thorpe Neighborhood Bank
Geographic Distribution of HMDA Loans (2014 – 2016)

Income Level	% Owner-Occupied Units (2010 Census)	Aggregate Comparison					
		2014		2015		2016	
		% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending
Low	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Moderate	47.5	69.3	42.6	67.5	42.1	61.0	41.8
Middle	52.5	30.7	57.4	32.5	57.9	39.0	58.2
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%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Jim Thorpe Neighborhood Bank Geographic Distribution of HMDA (2017)			
Income Level	% Owner-Occupied Units (2015 ACS)	Aggregate Comparison 2017	
		% Jim Thorpe Lending	% Aggregate Lending
Low	4.2	1.5	1.4
Moderate	28.9	16.7	33.4
Middle	59.3	78.8	59.8
Upper	7.6	3.0	5.4
Unknown	0.0	0.0	0.0
Total	**100%**	**100%**	**100%**

Lending in Low-Income Census Tracts

Jim Thorpe's overall HMDA lending in low-income tracts was considered reasonable.

<u>2010 Census Data</u>

According to the 2010 Census data, the assessment area contained no low-income census tracts, and therefore, geographic distribution in low-income tracts was not evaluated in 2014, 2015, and 2016.

<u>2015 ACS Data</u>

Jim Thorpe's lending in low-income census tracts in 2017 was considered reasonable. In 2017, just under 2% of the bank's loans financed properties in the assessment area's low-income census tract, mirroring aggregate performance. Both the bank's and the aggregate's lending levels were below the applicable owner-occupied housing proxy of 4%. Categorized by loan product type, Jim Thorpe originated 5% of its refinance loans in the assessment area's low-income census tract. Jim Thorpe did not originate any home-purchase, home-improvement, or multifamily loans in the assessment area's low-income census tract. 2017 aggregate lending data shows, 1% of all home-purchase loans, 2% of all refinance loans, 3% of all home-improvement loans, and no multifamily loans were originated in the low-income census tract.

Lending in Moderate-Income Census Tracts

Jim Thorpe's overall HMDA lending in moderate-income tracts was considered excellent.

<u>2010 Census Data</u>

Jim Thorpe's lending in moderate-income census tracts in 2014 was considered excellent. In 2014, 69% of the bank's loans financed properties in moderate-income census tracts, which is significantly more than the aggregate of 43% and the owner-occupied housing proxy of 48%. Categorized by loan product type, Jim Thorpe originated 67% of its home-purchase loans, 61% of its refinance loans, 79% of its home-improvement loans, and no multifamily loans in the assessment area's moderate-income census tracts. In the aggregate, lenders originated 45% of home-purchase loans, 36% of refinance loans, 48% of home-improvement loans, and 100% of multifamily loans in the assessment area's moderate-income census tracts.

Jim Thorpe's lending in moderate-income census tracts in 2015 was considered excellent. In 2015, 68% of the bank's loans financed properties in moderate-income census tracts, which significantly exceeds the aggregate of 42% and the owner-occupied housing proxy of 48%. Categorized by loan product type, Jim Thorpe originated 71% of its home-purchase loans, 53% of its refinance loans, 71% of its home-improvement loans, and 100% of its multifamily loans in the assessment area's moderate-income census tracts. In the aggregate, lenders originated 46% of home-purchase loans, 32% of refinance loans, 54% of home-improvement loans, and 85% of multifamily loans in the assessment area's moderate-income census tracts.

Jim Thorpe's lending in moderate-income census tracts in 2016 was considered excellent. In 2016, 61% of the bank's loans financed properties in moderate-income census tracts, which is significantly more than the aggregate of 42% and the owner-occupied housing proxy of 48%. Categorized by loan product type, Jim Thorpe originated 60% of its home-purchase loans, 67% of its refinance loans, 57% of home-improvement loans, and 100% of its multifamily loans in the assessment area's moderate-income census tracts. In the aggregate, lenders originated 43% of home-purchase loans, 37% of refinance loans, 50% of home-improvement loans, and 100% of multifamily loans in the assessment area's moderate-income census tracts.

2015 ACS Data

Jim Thorpe's lending in moderate-income census tracts in 2017 was considered reasonable. In 2017, 17% of the bank's loans financed properties in moderate-income census tracts, which underperformed the aggregate of 33% and the owner-occupied housing proxy of 29%. Categorized by loan product type, Jim Thorpe originated 14% of its home-purchase loans, 16% of its refinance loans, 19% of its home-improvement loans, and none of its multifamily loans in the assessment area's moderate-income census tracts. In the aggregate, lenders originated 36% of home purchase loans, 29% of refinance loans, 30% of home-improvement loans, and 33% of multifamily loans in the assessment area's moderate-income census tracts.

Small Business Lending

The geographic distribution of Jim Thorpe'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.

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 available business data, in 2016, there were no low- or upper-income census tracts in the assessment area. In 2016, 51% of businesses were located in the assessment area's moderate-income census tracts, while 49% were located in middle-income tracts.

Based on available business data, in 2017, 4% of businesses were located in the low-income tract, 28% were located in moderate-income tracts, 63% were located in middle-income tracts, and 7% in upper-income tracts.

The table below presents the geographic distribution of Jim Thorpe's sample of small business loans in comparison to the applicable business proxies for each of the years evaluated, and the 2016 and 2017 aggregate lending levels in the assessment area.

Jim Thorpe Neighborhood Bank Geographic Distribution of Small Business Loans						
			Aggregate Comparison			
			2016		2017	
Income Level	% Businesses By Income Tract Level 2016	% Businesses By Income Tract Level 2017	% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending
Low	0.0	3.6	0.0	0.0	6.7	1.9
Moderate	50.6	27.5	65.2	45.6	26.7	30.7
Middle	49.4	62.5	34.8	52.7	66.7	57.0
Upper	0.0	6.5	0.0	0.0	0.0	8.1
Unknown	0.0	0.0	0.0	1.6	0.0	2.3
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Lending in Low-Income Census Tracts

Jim Thorpe's small business lending in low-income census tracts was considered reasonable.

<u>2010 Census Data</u>

According to the 2010 Census Data, the assessment area contained no low-income census tracts, and therefore, geographic distribution in low-income tracts was not evaluated in 2016.

<u>2015 ACS Data</u>

Jim Thorpe's small business lending in low-income census tracts was reasonable. In 2017, Jim Thorpe originated 7% of its small business loans, in the assessment area's low-income census tract. The bank's lending level in the low-income census tract exceeded both the applicable business loan demand proxy of 4% and the aggregate lending level of 2%. However, because lending in the low-income census tract consisted of a single loan, performance is considered reasonable.

Lending in Moderate-Income Census Tracts

Jim Thorpe's small business lending in moderate-income census tracts was considered reasonable.

<u>2010 Census Data</u>

In 2016, Jim Thorpe's small business lending in moderate-income census tracts was considered excellent. The bank originated 65% of its small business loans (15 loans) in the assessment area's moderate-income census tracts. The bank's lending level in the assessment area's moderate-income census tracts exceeded both the applicable business loan demand proxy of 51% and the aggregate lending level of 46%.

2015 ACS Data

Jim Thorpe's small business lending in moderate-income tracts in 2017 was reasonable. The bank originated 27% of its small business loans (4 loans) in the assessment area's moderate-income census tracts. The bank's lending level in the moderate-income census tracts was lower than the applicable business loan demand proxy of 28% and the aggregate lending level of 31%.

RESPONSE TO SUBSTANTIATED COMPLAINTS

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

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

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

CRA APPENDICES

CRA APPENDIX A: GLOSSARY

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

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

Community development: All Agencies have adopted the following language.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CRA APPENDIX B: HMDA LOAN DISTRIBUTION TABLES

2014 HMDA LOAN DISTRIBUTION TABLE

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Purchase							
Low	0	0.0%	0	0.0%	3	12.5%	178	6.3%
Moderate	16	66.7%	1,625	57.1%	5	20.8%	509	17.9%
Middle	8	33.3%	1,222	42.9%	6	25.0%	722	25.4%
Upper	0	0.0%	0	0.0%	10	41.7%	1,438	50.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**24**	**100.0%**	**2,847**	**100.0%**	**24**	**100.0%**	**2,847**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	6	26.1%	303	15.8%
Moderate	14	60.9%	1,129	58.9%	4	17.4%	355	18.5%
Middle	9	39.1%	788	41.1%	7	30.4%	411	21.4%
Upper	0	0.0%	0	0.0%	6	26.1%	848	44.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**23**	**100.0%**	**1,917**	**100.0%**	**23**	**100.0%**	**1,917**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	5	17.9%	220	12.5%
Moderate	22	78.6%	1,275	72.6%	5	17.9%	335	19.1%
Middle	6	21.4%	480	27.4%	9	32.1%	523	29.8%
Upper	0	0.0%	0	0.0%	8	28.6%	637	36.3%
Unknown	0	0.0%	0	0.0%	1	3.6%	40	2.3%
Total	**28**	**100.0%**	**1,755**	**100.0%**	**28**	**100.0%**	**1,755**	**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%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	HMDA Totals							
Low	0	0.0%	0	0.0%	14	18.7%	701	10.8%
Moderate	52	69.3%	4,029	61.8%	14	18.7%	1,199	18.4%
Middle	23	30.7%	2,490	38.2%	22	29.3%	1,656	25.4%
Upper	0	0.0%	0	0.0%	24	32.0%	2,923	44.8%
Unknown	0	0.0%	0	0.0%	1	1.3%	40	0.6%
Total	**75**	**100.0%**	**6,519**	**100.0%**	**75**	**100.0%**	**6,519**	**100.0%**

2015 HMDA LOAN DISTRIBUTION TABLE

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Purchase							
Low	0	0.0%	0	0.0%	3	10.7%	60	2.7%
Moderate	20	71.4%	1,475	65.4%	10	35.7%	939	41.7%
Middle	8	28.6%	779	34.6%	5	17.9%	454	20.1%
Upper	0	0.0%	0	0.0%	10	35.7%	801	35.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**28**	**100.0%**	**2,254**	**100.0%**	**28**	**100.0%**	**2,254**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	3	15.8%	209	9.1%
Moderate	10	52.6%	797	34.8%	5	26.3%	188	8.2%
Middle	9	47.4%	1,490	65.2%	2	10.5%	267	11.7%
Upper	0	0.0%	0	0.0%	8	42.1%	1,540	67.3%
Unknown	0	0.0%	0	0.0%	1	5.3%	83	3.6%
Total	**19**	**100.0%**	**2,287**	**100.0%**	**19**	**100.0%**	**2,287**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	4	12.9%	165	10.2%
Moderate	22	71.0%	1,112	68.6%	6	19.4%	270	16.7%
Middle	9	29.0%	508	31.4%	6	19.4%	279	17.2%
Upper	0	0.0%	0	0.0%	12	38.7%	634	39.1%
Unknown	0	0.0%	0	0.0%	3	9.7%	272	16.8%
Total	**31**	**100.0%**	**1,620**	**100.0%**	**31**	**100.0%**	**1,620**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	100.0%	183	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%	2	100.0%	183	100.0%
Total	**2**	**100.0%**	**183**	**100.0%**	**2**	**100.0%**	**183**	**100.0%**
	HMDA Totals							
Low	0	0.0%	0	0.0%	10	12.5%	434	6.8%
Moderate	54	67.5%	3,567	56.2%	21	26.3%	1,397	22.0%
Middle	26	32.5%	2,777	43.8%	13	16.3%	1,000	15.8%
Upper	0	0.0%	0	0.0%	30	37.5%	2,975	46.9%
Unknown	0	0.0%	0	0.0%	6	7.5%	538	8.5%
Total	**80**	**100.0%**	**6,344**	**100.0%**	**80**	**100.0%**	**6,344**	**100.0%**

2016 HMDA LOAN DISTRIBUTION TABLE

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Purchase							
Low	0	0.0%	0	0.0%	3	20.0%	190	9.9%
Moderate	9	60.0%	856	44.4%	2	13.3%	200	10.4%
Middle	6	40.0%	1,071	55.6%	3	20.0%	304	15.8%
Upper	0	0.0%	0	0.0%	6	40.0%	1,033	53.6%
Unknown	0	0.0%	0	0.0%	1	6.7%	200	10.4%
Total	**15**	**100.0%**	**1,927**	**100.0%**	**15**	**100.0%**	**1,927**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	2	13.3%	178	13.8%
Moderate	10	66.7%	813	63.0%	2	13.3%	172	13.3%
Middle	5	33.3%	478	37.0%	8	53.3%	544	42.1%
Upper	0	0.0%	0	0.0%	3	20.0%	397	30.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**15**	**100.0%**	**1,291**	**100.0%**	**15**	**100.0%**	**2,114**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	2	7.1%	159	7.5%
Moderate	16	57.1%	1,188	56.2%	10	35.7%	482	22.8%
Middle	12	42.9%	926	43.8%	7	25.0%	540	25.5%
Upper	0	0.0%	0	0.0%	8	28.6%	768	36.3%
Unknown	0	0.0%	0	0.0%	1	3.6%	165	7.8%
Total	**28**	**100.0%**	**2,114**	**100.0%**	**28**	**100.0%**	**1,291**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	204	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%	204	100.0%
Total	**1**	**100.0%**	**204**	**100.0%**	**1**	**100.0%**	**204**	**100.0%**
	HMDA Totals							
Low	0	0.0%	0	0.0%	7	11.9%	527	9.5%
Moderate	36	61.0%	3,061	55.3%	14	23.7%	854	15.4%
Middle	23	39.0%	2,475	44.7%	18	30.5%	1,388	25.1%
Upper	0	0.0%	0	0.0%	17	28.8%	2,198	39.7%
Unknown	0	0.0%	0	0.0%	3	5.1%	569	10.3%
Total	**59**	**100.0%**	**5,536**	**100.0%**	**59**	**100.0%**	**5,536**	**100.0%**

2017 HMDA LOAN DISTRIBUTION TABLE

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	**#**	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Purchase							
Low	0	0.0%	0	0.0%	3	14.3%	175	7.1%
Moderate	3	14.3%	437	17.7%	5	23.8%	356	14.4%
Middle	17	81.0%	1,834	74.2%	2	9.5%	134	5.4%
Upper	1	4.8%	200	8.1%	9	42.9%	1,538	62.2%
Unknown	0	0.0%	0	0.0%	2	9.5%	268	10.8%
Total	**21**	**100.0%**	**2,471**	**100.0%**	**21**	**100.0%**	**2,471**	**100.0%**
	Refinance							
Low	1	5.3%	27	1.4%	1	5.3%	12	0.6%
Moderate	3	15.8%	163	8.5%	5	26.3%	333	17.4%
Middle	14	73.7%	1,682	87.9%	8	42.1%	980	51.2%
Upper	1	5.3%	42	2.2%	4	21.1%	547	28.6%
Unknown	0	0.0%	0	0.0%	1	5.3%	42	2.2%
Total	**19**	**100.0%**	**1,914**	**100.0%**	**19**	**100.0%**	**1,914**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	4	15.4%	177	10.1%
Moderate	5	19.2%	133	7.6%	6	23.1%	238	13.6%
Middle	21	80.8%	1,612	92.4%	7	26.9%	439	25.2%
Upper	0	0.0%	0	0.0%	9	34.6%	891	51.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**26**	**100.0%**	**1,745**	**100.0%**	**26**	**100.0%**	**1,745**	**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%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	HMDA Totals							
Low	1	1.5%	27	0.4%	8	12.1%	364	5.9%
Moderate	11	16.7%	733	12.0%	16	24.2%	927	15.1%
Middle	52	78.8%	5,128	83.7%	17	25.8%	1,553	25.3%
Upper	2	3.0%	242	3.9%	22	33.3%	2,976	48.5%
Unknown	0	0.0%	0	0.0%	3	4.5%	310	5.1%
Total	**66**	**100.0%**	**6,130**	**100.0%**	**66**	**100.0%**	**6,130**	**100.0%**

CRA APPENDIX C: SMALL BUSINESS LOAN DISTRIBUTION TABLES

2016 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	15	65.2%	3,736	86.1%	0	0.0%	0	0.0%
Middle	8	34.8%	604	13.9%	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	**23**	**100.0%**	**4,340**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Revenue							
Total $1 Million or Less	17	73.9%	1,757	40.5%	0	0.0%	0	0.0%
Over $1 Million	6	26.1%	2,583	59.5%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**23**	**100.0%**	**4,340**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size							
$100,000 or less	15	65.2%	649	15.0%	0	0.0%	0	0.0%
$100,001 - $250,000	3	13.0%	426	9.8%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	5	21.7%	3,265	75.2%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**23**	**100.0%**	**4,340**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	12	70.6%	516	29.4%	0	0.0%	0	0.0%
$100,001 - $250,000	3	17.6%	426	24.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	2	11.8%	815	46.4%	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	**17**	**100.0%**	**1,757**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

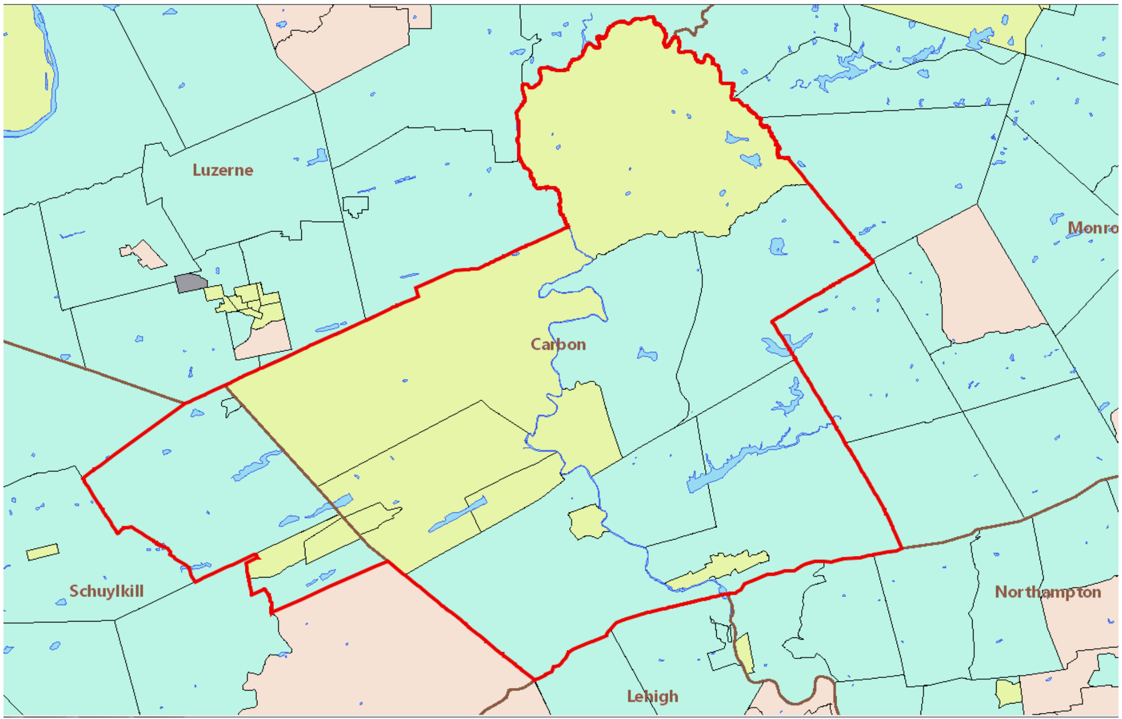
2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE

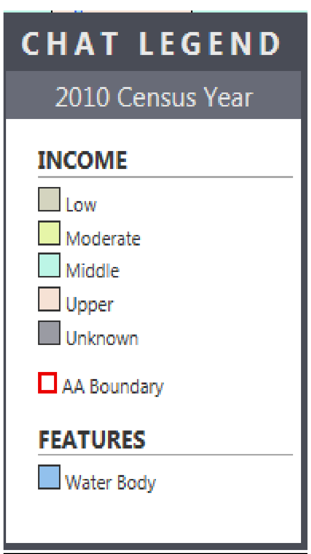
Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
	By Tract Income							
Low	1	6.7%	21	1.5%	0	0.0%	0	0.0%
Moderate	4	26.7%	274	19.9%	0	0.0%	0	0.0%
Middle	10	66.7%	1,084	78.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**15**	**100.0%**	**1,379**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Revenue							
Total $1 Million or Less	10	66.7%	1,148	83.2%	0	0.0%	0	0.0%
Over $1 Million	5	33.3%	231	16.8%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**15**	**100.0%**	**1,379**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size							
$100,000 or less	13	86.7%	676	49.0%	0	0.0%	0	0.0%
$100,001 - $250,000	1	6.7%	130	9.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	6.7%	573	41.5%	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	**15**	**100.0%**	**1,379**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	8	80.0%	445	38.8	0	0.0%	0	0.0%
$100,001 - $250,000	1	10.0%	130	11.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	10.0%	573	49.9%	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	**10**	**100.0%**	**1,148**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

CRA APPENDIX D: ASSESSMENT AREA MAPS

ASSESSMENT AREA

<u>2010 Census Data</u>





2015 ACS Data