



**PUBLIC DISCLOSURE**

Date of Evaluation: JANUARY 9, 2023

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Name of Depository Institution: NEW TRIPOLI BANK

Institution's Identification Number: 331713

Address: 6748 MADISON STREET

NEW TRIPOLI, PENNSYLVANIA

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

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

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## 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 **more than 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 reflects **reasonable** penetration among individuals of different income levels (including low- and moderate-income individuals) and businesses of different sizes.
- The geographic distribution of loans reflects **poor** 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 areas.

## SCOPE OF EXAMINATION

The performance of New Tripoli Bank (New Tripoli) under the Community Reinvestment Act (CRA) was evaluated using the Interagency Intermediate Small Institution Examination Procedures adopted by the Board of Governors. Performance for intermediate small banks is evaluated under two tests that consider the bank's lending and community development activities. The review period for this evaluation is from February 6, 2018, through January 9, 2023, and evaluates the bank's performance in its single assessment area using full-scope examination procedures.

The lending test includes an analysis of:

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

The loan products reviewed include:

- Home-purchase, home improvement and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose “not applicable,” collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for the calendar years 2018, 2019, 2020 and 2021<sup>1</sup>.
- A sample of 50 commercial loans, including 45 small business loans originated by the bank during calendar years 2018, 2019, 2020 and 2021.

Loan products were weighted according to loan and dollar volume. Because the bank originated more HMDA loans by both number and dollar volume than small business loans, HMDA loans were given the most weight in determining the bank’s overall CRA performance. In total during the evaluation period, New Tripoli originated 831 HMDA loans totaling over \$172 million in the assessment area. Small business loans were given the second highest weight in the analysis. Because the bank is not a CRA reporter, analysis of small business loans was based on a sample of 45 small business loans totaling \$16 million, originated between 2018 and 2021.

New Tripoli is a HMDA reporter, and therefore the bank’s HMDA performance was compared to the aggregate of all lenders in the bank’s assessment area reporting loans pursuant to HMDA. These data are reported annually.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts are classified on the basis of the 2015 American Community Survey (ACS) data for loans originated in 2018, 2019, 2020 and 2021<sup>2</sup>. The distribution of HMDA loans to borrowers of different income levels for the years of 2018, 2019, 2020 and 2021 were based on annually-adjusted 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 2015 ACS data, unless otherwise noted.

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

<sup>2</sup>In accordance with Federal Financial Institutions Examination Council policy, 2015 ACS data is used to analyze data starting in 2017 and thereafter.

As indicated previously, New Tripoli does not report small business loans for purposes of CRA and, therefore, the analysis of the bank's small business lending is based on a sample of 50 commercial loans originated in 2018, 2019, 2020 and 2021. For small business loans, examiners compared the bank's lending to Dun & Bradstreet data. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses. Because New Tripoli is not a small business reporter, it is not included in the ranking of aggregate lenders who report such loans in the Allentown-Bethlehem-Easton, PA-NJ 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.

The community development test includes an analysis of:

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

Under the community development test, the bank's level of community development loans, qualified investments and community development services were evaluated during the entire evaluation period, from February 6, 2018 through January 9, 2023. New Tripoli's level of community development activities was considered in the context of local needs and opportunities, as well as the bank's capacity to participate in such activities.

### **DESCRIPTION OF INSTITUTION**

New Tripoli was rated satisfactory as its previous CRA Evaluation dated February 5, 2018, which used the Interagency Intermediate Small Institution Examination Procedures.

New Tripoli, headquartered in New Tripoli, Lehigh County, Pennsylvania, is a state chartered, full-service community bank offering both consumer and commercial banking products and services to its customers. The bank operates three branches, all located in Lehigh County. The main office, located in the village of New Tripoli, in a rural middle-income census tract, was opened in 1909. The second office, located in an upper-income census tract in Orefield, was opened in 1999. The third branch, located in Emmaus in a middle-income census tract, is new since the previous exam. Previously a loan production office which was opened in 2016, the bank converted it into a full-service branch that opened in 2019.

The bank offers a variety of consumer and commercial banking services, including automated teller machines (ATMs) at its three office locations and two more in local malls. The first of these ATMs is located at the Star Plaza Mall in Lehigh County, PA and is in a middle-income census tract. The second is located at the Village Center Mall in Schuylkill County, PA and is also in a middle-income census tract.

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Additionally, the institution accommodates its customers with alternative delivery methods including online and mobile banking, which allow customers to transfer funds between accounts and obtain account balances. The bank also offers a free checking account with no minimum balance requirement and no monthly service charge. These features provide greater access to banking services for low- and moderate-income consumers.

New Tripoli is the sole banking subsidiary of New Tripoli Bancorp, Inc. (Bancorp). According to the Consolidated Reports of Condition and Income (Call Report) as of June 30, 2022, New Tripoli reported nearly \$586 million in total assets, of which nearly \$421 million (72%) were loans. Since its last CRA evaluation dated February 5, 2018, the bank’s assets have grown 34% from \$436 million as of September 30, 2017, to \$586 million as of June 30, 2022. Similarly, the bank’s loans increased 30% since its last CRA evaluation, when loans totaled \$324 million as of September 30, 2017, to nearly \$421 million as of June 30, 2022.

On a dollar volume basis, residential mortgages (which include open-end and closed-end loans secured by residential properties, and multifamily homes) represented the largest segment of the bank’s loan portfolio, at over \$265 million or 63% of the bank’s loan portfolio. Commercial loans (comprised of commercial mortgages and commercial and industrial loans) comprised the second largest segment of the bank’s portfolio at \$130 million or 31%.

The table<sup>3</sup> below shows the composition of the bank’s loan portfolio as of June 30, 2022.

<b>New Tripoli Bank</b>		
<b>LOANS as of 06/30/2022</b>	<b>\$ (000s)</b>	<b>%</b>
Loans Secured by Nonfarm Nonresidential properties (Commercial Mortgages)	101,408	24.1
Commercial and Industrial Loans	29,048	6.9
Secured by Farmland	1,383	0.3
Secured by Residential Properties (Closed-end)	236,105	56.1
Secured by Residential Properties (Open-end)	13,155	3.1
Secured by Multifamily Residential Properties	15,888	3.8
Construction & Land Development	8,501	2.0
Consumer Loans	1,317	0.3
Loans to Finance Agricultural Production & Other Loans to Farmers	2	<0.1
States and Political Subdivisions	14,000	3.3
Other Loans	7	<0.1
Other Leases	0	0.0
<b>TOTAL LOANS</b>	<b>\$420,814</b>	<b>100.0%</b>

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<sup>3</sup>Source: Consolidated Reports of Condition and Income (Call Report) Schedule RC-C Part 1 (Loans and Leases), as of June 30, 2022.

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**Small Business Loans**

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report, as of June 30, 2022 indicates that \$70 million (54%) of the bank’s outstanding commercial loans<sup>4</sup> were designated as small business loans. At the previous CRA evaluation, using the September 30, 2017 Call Report, approximately \$50 million of outstanding commercial loans (61%) were designated as small business loans. For the purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of \$1 million or less, as detailed in the following table.

<b>New Tripoli Bank Small Business Loans</b>		
	<b>Amount Outstanding as of 06/30/2022 \$ (000s)</b>	<b>%</b>
Loans with original amounts of \$100,000 or less	4,754	3.6
Loans with original amounts of \$100,001 through \$250,000	12,989	10.0
Loans with original amounts of \$250,001 to \$1 million	52,541	40.3
<b>TOTAL SMALL BUSINESS LOANS</b>	<b>70,284</b>	<b>53.9</b>
Loans with original amounts of more than \$1,000,000	60,172	46.1
<b>TOTAL COMMERCIAL LOANS</b>	<b>\$130,456</b>	<b>100.0%</b>

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 the purposes of the CRA, New Tripoli has designated one assessment area, the Allentown, PA assessment area, which consists of the entirety of Lehigh County, along with 23 census tracts located in Northampton, Carbon, Berks, and Schuylkill counties, which are adjacent to Lehigh County. The bank’s assessment area is part of the larger Allentown-Bethlehem-Easton, PA-NJ MSA, which includes all of Lehigh, Northampton and Carbon counties in Pennsylvania, and Warren County in New Jersey.

The bank’s assessment area has changed since the previous examination. More specifically, the bank added twelve additional census tracts to its assessment area, all of which are in Northampton County, in the city of Bethlehem. The assessment area was determined to comply with the requirements of the CRA, and does not arbitrarily exclude low- or moderate-income census tracts.

Examiners also analyzed the demographic characteristics of the 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. Further, bank management provided information regarding the bank’s lending activities, credit demand, and competition.

<sup>4</sup>Commercial loans are comprised of loans secured by nonfarm nonresidential properties, along with commercial and industrial loans.

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

Community contacts raised concerns about the age and quality of housing stock in the area, particularly in the city of Allentown. Low property values, and the significant investment needed to improve the quality of the housing stock, represent notable housing challenges. Additionally, contacts noted challenges with increasing rent costs, and indicated that they were uncertain whether renters receiving assistance from the Emergency Rental Assistance Program would be able to pay their rents once the program ends. Interviewees revealed that families who have never utilized food banks before are relying on services now, causing food banks in the area to see a significant increase in demand. Finally, one contact identified a need for financial literacy programming, given inflationary pressures.

According to 2015 ACS data, the Allentown, PA assessment area included 99 census tracts. Of the total, 76 census tracts were located in Lehigh County, 16 in Northampton County, five in Carbon County, and one tract each in Berks and Schuylkill counties. Of the 99 census tracts, 14 (14%) were designated as low-income, 21 (21%) as moderate-income, 40 (40%) as middle-income, and 24 (24%) were upper-income census tracts. According to 2015 ACS data, the assessment area had a population of 469,777, and just over 33% of the assessment area's population resided in the low- or moderate-income census tracts. A map of the Allentown, PA assessment area at the 2015 ACS update is available in Appendix D.

New Tripoli'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, 2022<sup>5</sup>, there were 21 depository institutions operating in Lehigh County, where the majority of the census tracts in the bank's assessment area are located (76 of 99 tracts, or 77%). These institutions maintained a total of 81 banking offices, holding just under \$11 billion in deposits in the assessment area. New Tripoli ranked eighth among these institutions, holding over \$515 million in deposits, or almost 5% of the market share. Wells Fargo Bank, N.A. ranked first with almost 26% of the market share, followed by Truist Bank and Bank of America, N.A., with 13% and nearly 8% of the deposit market share, respectively.

As mentioned previously, New Tripoli reports home-mortgages loans pursuant to HMDA and was compared to the aggregate of all lenders in the market that report real estate loans pursuant to HMDA. This data is reported annually. According to 2018 data, there were 407 HMDA reporters in the assessment area, who originated or purchased a total of 12,959 HMDA loans in the Allentown, PA assessment area. New Tripoli ranked eighteenth with just over 1% of the HMDA market. Wells Fargo Bank, N.A. led the market with over 10% of the market, followed by American Neighborhood Mortgage with almost 5% of the market, and Caliber Home Loans, Inc., with nearly 4%.

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<sup>5</sup> June 30, 2022 is the most recent date for which FDIC deposit data is available.

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In 2019, there were 381 HMDA reporters in the assessment area, who originated or purchased a total of 14,779 HMDA loans. New Tripoli ranked fifteenth with less than 2% of the HMDA market. Once again, Wells Fargo Bank, N.A. led the market with just under 10% market share, followed by Quicken Loans, LLC (4%), and Caliber Home Loans, Inc. (nearly 4%).

In 2020, there were 439 HMDA reporters in the assessment area, who originated or purchased a total of 19,428 HMDA loans in the Allentown, PA assessment area. New Tripoli ranked twenty-fourth with 1% of the HMDA market. As in past years, Wells Fargo Bank, N.A. led the market with just under 9% market share, followed by Quicken Loans, LLC (6%), and Caliber Home Loans, Inc. (3%).

Finally, in 2021, there were 465 HMDA reporters in the assessment area, who originated or purchased a total of 21,745 HMDA loans in the assessment area. New Tripoli tied for twenty-seventh with just under 1% of the HMDA market. Rocket Mortgage, LLC led the market with 7% market share, followed by Wells Fargo Bank, N.A. (just under 7%), and Cross Country Mortgage, Inc. (4%).

As indicated previously, New Tripoli does not report small business loans for the purpose of CRA, and therefore is not included in the ranking of small business lenders operating in the assessment area. Accordingly, aggregate small business lending performance is included below for performance context information only, instead of for direct comparison. This data is also reported on an annual basis. In 2018, 93 small business reporters originated or purchased a total of 8,754 small business and small farm loans in the Allentown, PA assessment area. Among these reporters, American Express, N.B. ranked first with 18% of the small business market, followed by Wells Fargo Bank, N.A. (11%), and Chase Bank USA, N.A. (10%).

In 2019, 99 small business reporters originated or purchased a total of 9,313 small business and small farm loans in the assessment area. Among these reporters, American Express, N.B. ranked first with just under 18% of the market share, followed by JP Morgan Chase Bank, N.A. (12%), and Wells Fargo Bank, N.A. (9%).

In 2020, 132 small business reporters originated or purchased a total of 10,388 small business and small farm loans in the Allentown, PA assessment area. Among these reporters, American Express, N.B. ranked first with 12% of the market share, followed by Wells Fargo Bank, N.A. (10%), and Truist Bank (6%).

Finally, in 2021, 126 small business reporters originated or purchased a total of 11,741 small business and small farm loans in the assessment area. Among these reporters, American Express, N.B. ranked first with 15% market share, followed by Wells Fargo Bank, N.A. (10%), and JP Morgan Chase Bank USA, N.A. (7%).

## **ECONOMIC CHARACTERISTICS**

Located in eastern Pennsylvania, the Allentown-Bethlehem-Easton, PA-NJ MSA is comprised of Carbon, Lehigh, and Northampton counties in Pennsylvania, and Warren County in New Jersey. The MSA is situated between the Philadelphia metropolitan area, located 60 miles to the southeast, and the New York City metropolitan area, located 90 miles to the east. The Allentown-Bethlehem-Easton, PA-NJ MSA is the third most populous metropolitan area in the Commonwealth of Pennsylvania, following Philadelphia and Pittsburgh. The MSA's population measured 828,232 according to 2015 ACS data.

According to the Moody's Analytics May 2022 Precis report, the Allentown-Bethlehem-Easton, PA MSA is in recovery mode. The COVID-19 Pandemic adversely impacted jobs in the area, but the MSA is recovering solidly according to Moody's. The MSA is one of two in Pennsylvania that are closer to a full jobs recovery than the United States, in terms of manufacturing and transportation job growth. Though labor force growth is slow in the MSA, it compares favorably with the state and the rest of the Northeast. As a result, Moody's Analytics predicts that the Allentown-Bethlehem-Easton, PA MSA will enter the expansion phase of the business cycle well ahead of Pennsylvania and the Northeast.

Strengths noted in the May 2022 Moody's Precis report include the MSA's proximity to the more expensive Philadelphia and New York City metro areas, downtown revitalization projects, which spur investments and hiring, below-average employment volatility, and positive net migration into the area. On the other hand, weaknesses include an aging infrastructure, weak local government finances, and an aging population.

In the MSA, the largest employment sector is education and health services, accounting for nearly 21% of jobs. Other significant industries include professional and business services (13%), manufacturing (almost 11%), retail trade (nearly 11%), government (10%), and transportation/utilities (10%). The largest private employers in the MSA include Lehigh Valley Health Network, St. Luke's University Health Network, Sands Bethworks Gaming, LLC, and Giant Food Stores.

During the evaluation period, seasonally unadjusted unemployment rates increased substantially in 2020 due to the COVID-19 Pandemic, and then fell from 2020 to 2021. Rates in the MSA exceed statewide and national unemployment rates for all years evaluated. Area seasonally unadjusted unemployment rates for the years 2018, 2019, 2020 and 2021, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table.

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<b>New Tripoli Bank Allentown, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)</b>				
<b>Geographic Area</b>	<b>% 2018 Annual</b>	<b>% 2019 Annual</b>	<b>% 2020 Annual</b>	<b>% 2021 Annual</b>
Berks County	4.3	4.5	9.5	6.6
Carbon County	5.2	5.5	9.8	6.7
Lehigh County	4.8	4.6	9.6	6.8
Northampton County	4.6	4.6	8.9	5.9
Schuylkill County	5.4	5.6	9.3	6.8
Allentown-Bethlehem-Easton, PA-NJ MSA	4.6	4.5	9.2	6.3
Pennsylvania	4.5	4.5	9.1	6.3
United States	3.9	3.7	8.1	5.3

Unemployment data is from the Bureau of Labor Statistics.

## **HOUSING**

According to 2015 ACS data, the Allentown, PA assessment area contained 190,939 housing units, of which 62% were owner-occupied, 31% were rental units, and 7% were vacant. The overall owner-occupied rate in the assessment area (62%) nearly matched that in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to 2015 ACS data, of the 118,214 owner-occupied housing units in the Allentown, PA assessment area, almost 5% were located in the assessment area's low-income census tracts, and 15% were located in moderate-income tracts. The majority of owner-occupied housing units were located in middle-income tracts (45%) and upper-income tracts (almost 36%).

Of the total existing housing units, almost 74% were single family units, just under 10% were two-to-four family units, nearly 14% were multifamily units, and 3% were mobile homes. The median age of housing stock in the assessment area was 56 years, making it comparable to the median age of 54 years for the Commonwealth of Pennsylvania. This data was anecdotally confirmed by community contacts, who referenced the older housing stock, which is in need of rehabilitation.

Data shows that the price of housing in the assessment area is less affordable than in the Commonwealth overall. The median housing value in the assessment area was \$186,463, which was higher than the state median housing value of \$166,000. Data shows a significant disparity in median housing values in low- and moderate-income tracts compared to those in middle- and upper-income areas. In low-income tracts, the median housing value was \$94,090, and in moderate-income tracts, the value increased to \$132,563. These values were notably lower than the median housing value in middle- and upper-income tracts (\$176,644 and \$260,435, respectively).

Finally, median gross rent (rent plus utilities) in the assessment area was higher than in Pennsylvania overall. Median gross rent for the assessment area was reported at \$917, compared to statewide gross rent of \$840 per month. Within the Allentown, PA assessment area, almost 52% of renters spent more than 30% of their income on rent, which was above the same measure statewide (46%).

**BORROWER INCOME DATA**

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. According to the 2015 ACS data, there were 118,119 families in the assessment area. Of the total families in the assessment area, 23% were designated as low-income, 19% were moderate-income, 21% were middle-income, and 37% were upper-income families. According to 2015 ACS data, almost 10% of families in the Allentown, PA assessment area were living below the poverty level, which was just above the same measure in the Commonwealth (9%).

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

Year	HUD Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2018	\$76,100	Less than \$38,050	\$38,050 - \$60,879	\$60,880 - \$91,319	\$91,320 or more
2019	\$80,200	Less than \$40,100	\$40,100 - \$64,159	\$64,160 - \$96,239	\$96,240 or more
2020	\$80,400	Less than \$40,200	\$40,200 - \$64,319	\$64,320 - \$96,479	\$96,480 or more
2021	\$84,900	Less than \$42,450	\$42,450 - \$67,919	\$67,920 - \$101,879	\$101,880 or more

**GEOGRAPHIC BUSINESS DATA**

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data in 2018, there were 21,049 businesses located in the Allentown, PA assessment area. Of these businesses, just under 9% were located in low-income census tracts, and nearly 19% were located in moderate-income tracts. The majority of businesses were located in middle- (39%) and upper-income tracts (33%). Business demographic data also revealed that of the 21,049 businesses located in the assessment area in 2018, 91% were small businesses with gross annual revenues of \$1 million or less.

In 2019, a total of 21,172 businesses operated in the assessment area. Using 2019 Dun & Bradstreet data, 9% of businesses were located in low-income census tracts, 19% were located in moderate-income tracts, 39% were in middle-income tracts, and 33% were in upper-income tracts. Business demographics also revealed that of the 21,172 businesses in the assessment area, 91% were small businesses with revenues of less than \$1 million or less.

In 2020, a total of 20,174 businesses operated in the assessment area. Little change was noted in small business demographics. As in prior years, using 2020 Dun & Bradstreet data, just under 9% of businesses were located in low-income census tracts, 19% were located in moderate-income tracts, 39% were in middle-income tracts, and almost 34% were located in upper-income tracts. Business demographics also revealed that of the 20,174 businesses in the assessment area, 91% were small businesses with revenues of less than \$1 million or less.

Finally, in 2021, a total of 19,767 businesses operated in the assessment area. Using 2021 Dun & Bradstreet data, 9% of businesses were located in low-income census tracts, almost 19% were located in moderate-income tracts, nearly 39% were in middle-income tracts, and 34% were in upper-income tracts. Business demographics also revealed that of the 19,767 businesses in the assessment area, almost 91% were small businesses with revenues of less than \$1 million or less.

The 2018, 2019, 2020 and 2021 assessment area demographics used to evaluate New Tripoli's CRA performance in the Allentown, PA assessment area are detailed in the tables on the following pages.

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New Tripoli Bank Allentown, PA Assessment Area Assessment Area Demographics 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	14	14.1	11,573	9.8	4,199	36.3	26,956	22.8
Moderate-income	21	21.2	21,652	18.3	3,685	17.0	22,247	18.8
Middle-income	40	40.4	48,693	41.2	2,472	5.2	24,973	21.2
Upper-income	24	24.3	36,281	30.7	911	2.5	44,023	37.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>99</b>	<b>100.0</b>	<b>118,199</b>	<b>100.0</b>	<b>11,267</b>	<b>9.5</b>	<b>118,199</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	21,214	5,286	4.5	24.9	12,903	60.8	3,025	14.3
Moderate-income	38,941	17,478	14.8	44.9	18,459	47.4	3,004	7.7
Middle-income	78,677	53,481	45.2	68.0	20,568	26.1	4,628	5.9
Upper-income	52,107	41,969	35.5	80.5	7,470	14.3	2,668	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>190,939</b>	<b>118,214</b>	<b>100.0</b>	<b>61.9</b>	<b>59,400</b>	<b>31.1</b>	<b>13,325</b>	<b>7.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,871	8.9	1,672	8.8	185	10.5	14	6.5
Moderate-income	3,906	18.6	3,466	18.2	415	23.6	25	11.7
Middle-income	8,291	39.3	7,573	39.6	613	34.9	105	49.1
Upper-income	6,981	33.2	6,366	33.4	545	31.0	70	32.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>21,049</b>	<b>100.0</b>	<b>19,077</b>	<b>100.0</b>	<b>1,758</b>	<b>100.0</b>	<b>214</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.6</b>		<b>8.4</b>		<b>1.0</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.6	2	0.7	0	0.0	0	0.0
Moderate-income	14	4.5	13	4.2	1	16.7	0	0.0
Middle-income	170	54.3	168	54.9	2	33.3	0	0.0
Upper-income	127	40.6	123	40.2	3	50.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>313</b>	<b>100.0</b>	<b>306</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.8</b>		<b>1.9</b>		<b>0.3</b>	

Information based on 2015 ACS Data and 2018 Dun & Bradstreet Information

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
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New Tripoli Bank Allentown, PA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	14	14.1	11,573	9.8	4,199	36.3	26,956	22.8
Moderate-income	21	21.2	21,652	18.3	3,685	17.0	22,247	18.8
Middle-income	40	40.4	48,693	41.2	2,472	5.2	24,973	21.2
Upper-income	24	24.3	36,281	30.7	911	2.5	44,023	37.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>99</b>	<b>100.0</b>	<b>118,199</b>	<b>100.0</b>	<b>11,267</b>	<b>9.5</b>	<b>118,199</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	21,214	5,286	4.5	24.9	12,903	60.8	3,025	14.3
Moderate-income	38,941	17,478	14.8	44.9	18,459	47.4	3,004	7.7
Middle-income	78,677	53,481	45.2	68.0	20,568	26.1	4,628	5.9
Upper-income	52,107	41,969	35.5	80.5	7,470	14.3	2,668	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>190,939</b>	<b>118,214</b>	<b>100.0</b>	<b>61.9</b>	<b>59,400</b>	<b>31.1</b>	<b>13,325</b>	<b>7.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,909	9.0	1,714	8.9	182	10.5	13	6.1
Moderate-income	3,952	18.7	3,515	18.3	414	24.0	23	10.8
Middle-income	8,329	39.3	7,625	39.6	599	34.7	105	49.5
Upper-income	6,982	33.0	6,378	33.2	533	30.8	71	33.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>21,172</b>	<b>100.0</b>	<b>19,232</b>	<b>100.0</b>	<b>1,728</b>	<b>100.0</b>	<b>212</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>8.2</b>		<b>1.0</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.6	2	0.6	0	0.0	0	0.0
Moderate-income	18	5.6	17	5.4	1	16.7	0	0.0
Middle-income	170	52.5	168	53.0	2	33.3	0	0.0
Upper-income	134	41.3	130	41.0	3	50.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>324</b>	<b>100.0</b>	<b>317</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.8</b>		<b>1.9</b>		<b>0.3</b>

Information based on 2015 ACS Data and 2019 Dun & Bradstreet Information

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
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New Tripoli Bank Allentown, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	14	14.1	11,573	9.8	4,199	36.3	26,956	22.8
Moderate-income	21	21.2	21,652	18.3	3,685	17.0	22,247	18.8
Middle-income	40	40.4	48,693	41.2	2,472	5.1	24,973	21.2
Upper-income	24	24.3	36,281	30.7	911	2.5	44,023	37.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>99</b>	<b>100.0</b>	<b>118,199</b>	<b>100.0</b>	<b>11,267</b>	<b>9.5</b>	<b>118,199</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	21,214	5,286	4.5	24.9	12,903	60.8	3,025	14.3
Moderate-income	38,941	17,478	14.8	44.9	18,459	47.4	3,004	7.7
Middle-income	78,677	53,481	45.2	68.0	20,568	26.1	4,628	5.9
Upper-income	52,107	41,969	35.5	80.5	7,470	14.3	2,668	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>190,939</b>	<b>118,214</b>	<b>100.0</b>	<b>61.9</b>	<b>59,400</b>	<b>31.1</b>	<b>13,325</b>	<b>7.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1,791	8.9	1,601	8.7	175	10.6	15	7.0
Moderate-income	3,767	18.7	3,360	18.4	385	23.3	22	10.3
Middle-income	7,844	38.8	7,164	39.1	572	34.6	108	50.8
Upper-income	6,772	33.6	6,183	33.8	521	31.5	68	31.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>20,174</b>	<b>100.0</b>	<b>18,308</b>	<b>100.0</b>	<b>1,653</b>	<b>100.0</b>	<b>213</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>8.2</b>		<b>1.1</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	2	0.7	2	0.7	0	0.0	0	0.0
Moderate-income	14	4.6	14	4.7	0	0.0	0	0.0
Middle-income	163	54.0	161	54.4	2	40.0	0	0.0
Upper-income	123	40.7	119	40.2	3	60.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>302</b>	<b>100.0</b>	<b>296</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.0</b>		<b>1.7</b>		<b>0.3</b>

Information based on 2015 ACS Data and 2020 Dun & Bradstreet Information

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
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New Tripoli Bank Allentown, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	14	14.1	11,573	9.8	4,199	36.3	26,956	22.8
Moderate-income	21	21.2	21,652	18.3	3,685	17.0	22,247	18.8
Middle-income	40	40.4	48,693	41.2	2,472	5.2	24,973	21.2
Upper-income	24	24.3	36,281	30.7	911	2.5	44,023	37.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>99</b>	<b>100.0</b>	<b>118,199</b>	<b>100.0</b>	<b>11,267</b>	<b>9.5</b>	<b>118,199</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	21,214	5,286	4.5	24.9	12,903	60.8	3,025	14.3
Moderate-income	38,941	17,478	14.8	44.9	18,459	47.4	3,004	7.7
Middle-income	78,677	53,481	45.2	68.0	20,568	26.1	4,628	5.9
Upper-income	52,107	41,969	35.5	80.5	7,470	14.3	2,668	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>190,939</b>	<b>118,214</b>	<b>100.0</b>	<b>61.9</b>	<b>59,400</b>	<b>31.1</b>	<b>13,325</b>	<b>7.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,809	9.2	1,617	9.0	177	10.8	15	6.9
Moderate-income	3,663	18.5	3,257	18.2	384	23.5	22	10.2
Middle-income	7,602	38.5	6,932	38.7	563	34.5	107	49.5
Upper-income	6,693	33.8	6,112	34.1	509	31.2	72	33.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>19,767</b>	<b>100.0</b>	<b>17,918</b>	<b>100.0</b>	<b>1,633</b>	<b>100.0</b>	<b>216</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.6</b>		<b>8.3</b>		<b>1.1</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.7	2	0.7	0	0.0	0	0.0
Moderate-income	14	4.9	13	4.7	1	14.3	0	0.0
Middle-income	150	52.4	148	53.2	2	28.6	0	0.0
Upper-income	120	42.0	115	41.4	4	57.1	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>286</b>	<b>100.0</b>	<b>278</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.2</b>		<b>2.4</b>		<b>0.3</b>

Information based on 2015 ACS Data and 2021 Dun & Bradstreet Information

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

**LENDING TEST**

Performance under the lending test is rated satisfactory based on a review of the bank’s loan-to-deposit ratio, assessment area concentration, borrower and geographic distribution of loans, and response to CRA complaints, as discussed below.

**Loan-to-Deposit Ratio**

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

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

The table on the following page shows New Tripoli’s quarterly loan-to-deposit ratios for the period since the last CRA evaluation<sup>6</sup>:

<b>New Tripoli Bank Historical Loan-to-Deposit Ratios</b>				
<b>As of Date</b>	<b>Net Loans \$ (000s)</b>	<b>Total Deposits \$ (000s)</b>	<b>New Tripoli LTD Ratio (%)</b>	<b>Peer LTD Ratio (%)</b>
12/31/2017	328,178	321,393	102.1	82.2
03/31/2018	340,096	329,952	103.1	81.7
06/30/2018	344,982	328,290	105.1	82.8
09/30/2018	350,668	375,591	93.4	83.2
12/31/2018	357,747	378,234	94.6	83.1
03/31/2019	365,022	368,462	99.1	82.2
06/30/2019	372,970	382,606	97.5	83.2
09/30/2019	377,393	393,620	95.9	82.9
12/31/2019	380,424	386,916	98.3	82.4
03/31/2020	383,469	394,574	97.2	81.9
06/30/2020	392,704	408,173	96.2	80.8
09/30/2020	390,001	439,264	88.8	80.0
12/31/2020	389,203	459,943	84.6	75.8
03/31/2021	396,528	472,551	83.9	72.3
06/30/2021	396,348	468,815	84.5	70.9
09/30/2021	391,528	483,471	81.0	69.4
12/31/2021	397,263	510,482	77.8	67.9
03/31/2022	400,902	510,807	78.5	66.5
06/30/2022	415,590	515,419	80.6	69.2
09/30/2022	441,530	534,862	82.6	71.2
<b>Quarterly Loan-to-Deposit Average Since Previous Evaluation</b>			<b>91.2%</b>	<b>74.2%</b>

Source: The Uniform Bank Performance Report

<sup>6</sup>The current peer group for New Tripoli consists of all insured commercial banks having assets of between \$300 million and \$1 billion.

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**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION**  
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New Tripoli’s net loan-to-deposit ratio averaged 91% over the 20 consecutive quarters since the previous CRA evaluation. The bank’s ratio was above the peer group’s average loan-to-deposit ratio of 74%. New Tripoli’s average loan-to-deposit ratio dipped slightly from the previous evaluation, when it was reported at just under 94%.

In absolute terms, the bank’s net loan volume has increased nearly 35% over the evaluation period, from just over \$328 million as of December 31, 2017 to \$442 million as of September 30, 2022. Deposits have increased by 66% from \$321 million as of December 31, 2017 to \$535 million as of September 30, 2022.

**Assessment Area Concentration**

An analysis was performed to determine the volume of loans extended inside and outside of the bank’s assessment area. The analysis consisted of an evaluation of New Tripoli’s HMDA loans, and the sample of small business loans. The concentration analysis indicated that a majority of New Tripoli’s loans and other lending-related activities were made in the assessment area.

During the evaluation period, New Tripoli made 79% of HMDA loans by number, and 82% of loans by dollar amount, in the bank’s assessment area. This performance mirrored levels at the previous CRA evaluation, when 78% by number and 81% by dollar volume were made within the bank’s assessment area.

With respect to small business loans, 87% of the number of small business loans sampled were extended within the bank’s assessment area, while 92% of the aggregate dollar amount of loans sampled were extended in its assessment area.<sup>7</sup> At the prior CRA evaluation, 73% of small business loans by number and by dollar amount, were made within the assessment area.

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

<b>New Tripoli Bank</b>								
<b>Lending Inside and Outside the Assessment Area</b>								
<b>Loan Types</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	55	74.3	3,478	77.0	19	25.7	1,039	23.0
Home Purchase – Conventional	361	74.3	78,995	76.4	125	25.7	24,337	23.6
Multifamily Housing	29	90.6	24,464	95.2	3	9.4	1,225	4.8
Other Purpose Closed-End	49	87.5	3,324	87.2	7	12.5	487	12.8
Refinancing	337	84.5	62,077	85.9	62	15.5	10,176	14.0
<b>Total HMDA related</b>	<b>831</b>	<b>79.4</b>	<b>172,337</b>	<b>82.2</b>	<b>216</b>	<b>20.6</b>	<b>37,263</b>	<b>17.8</b>
Small Business	45	86.5	16,176	92.4	7	13.5	1,329	7.6
<b>Total Small Business related</b>	<b>45</b>	<b>86.5</b>	<b>16,176</b>	<b>92.4</b>	<b>7</b>	<b>13.5</b>	<b>1,329</b>	<b>7.6</b>
<b>TOTAL LOANS</b>	<b>876</b>	<b>79.7</b>	<b>188,514</b>	<b>83.0</b>	<b>223</b>	<b>20.3</b>	<b>38,592</b>	<b>17.0</b>

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<sup>7</sup>The analysis of small business lending is based on a statistical sample of the commercial loans originated by the bank during the evaluation period, spanning 2018 to 2021.

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**Borrower Distribution of Lending<sup>8</sup>**

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

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

**Home-Mortgage Lending**

New Tripoli’s distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, was reasonable.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families within an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to 2015 ACS data, 23% of assessment area families were low-income families, 19% were moderate-income, 21% were middle-income, and 37% were upper-income families. According to 2015 ACS data, more than 40% of families in the Allentown, PA assessment area were designated as low- or moderate-income, indicating a notable need for home-mortgage credit among this segment of the population.

The following tables compare New Tripoli’s home-mortgage lending to aggregate home-mortgage lending levels, using the percentage of low- and moderate-income families in the assessment area as proxies for loan demand. The tables rely on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

New Tripoli Bank Allentown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level					
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison			
		2018		2019	
		% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending
Low	22.8	8.9	10.1	9.5	10.1
Moderate	18.8	17.2	20.6	19.8	20.9
Middle	21.2	21.4	21.6	18.0	20.9
Upper	37.2	41.7	31.1	34.2	31.6
Unknown	0.0	10.8	16.6	18.5	16.5
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<sup>8</sup>The information used to evaluate lending activity by New Tripoli is detailed in the Loan Distribution Tables contained in the Appendices.

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New Tripoli Bank Allentown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level					
Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison			
		2020		2021	
		% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending
Low	22.8	8.4	7.3	9.4	8.8
Moderate	18.8	14.0	17.5	13.4	19.8
Middle	21.2	14.0	20.3	21.3	21.4
Upper	37.2	46.5	37.1	40.1	33.2
Unknown	0.0	17.1	17.8	15.8	16.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

*Lending to Low-Income Borrowers*

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

New Tripoli’s lending in 2018 to low-income borrowers was reasonable. In 2018, 9% of the bank’s HMDA loans (17 loans) were originated to low-income borrowers, falling just short of the performance of aggregate lenders (10%). Both the bank’s performance and that of aggregate lenders were significantly lower than the proxy of families by family income (23%). By product type, New Tripoli made 6% of home purchase loans, 13% of refinance loans, 6% of home improvement loans, and no multifamily, or loans with purpose “not applicable” to low-income borrowers in 2018. Comparatively, aggregate lenders made 11% of home purchase loans, 11% of refinance loans, 9% of home improvement loans, 1% of multifamily loans, and 1% of loans with purpose “not applicable” to low-income borrowers in 2018.

New Tripoli’s lending in 2019 to low-income borrowers was reasonable. In 2019, just under 10% of the bank’s HMDA loans (21 loans) were originated to low-income borrowers, matching the performance of aggregate lenders (10%). Both the bank’s performance and that of aggregate lenders were significantly lower than the proxy of families by family income (23%). By product type, New Tripoli made 4% of home purchase loans, 15% of refinance loans, 14% of home improvement loans, 17% of other purpose closed or exempt loans, and no multifamily, or loans with purpose “not applicable” to low-income borrowers in 2019. Comparatively, aggregate lenders made 12% of home purchase loans, 8% of refinance loans, 8% of home improvement loans, 1% of multifamily loans, and 1% of loans with purpose “not applicable” to low-income borrowers in 2019.

New Tripoli’s lending in 2020 to low-income borrowers was reasonable. In 2020, 8% of the bank’s HMDA loans (18 loans) were originated to low-income borrowers, which was higher than the performance of aggregate lenders (7%). Both the bank’s performance and that of aggregate lenders were significantly lower than the proxy of families by family income (23%). By product type, New Tripoli made 4% of home purchase loans, 12% of refinance loans, 17% of home improvement loans, and no multifamily, or loans with purpose “not applicable” to low-income borrowers in 2020. Comparatively, aggregate lenders made 13% of home purchase loans, 4% of refinance loans, 5% of home improvement loans, and no multifamily or loans with purpose “not applicable” to low-income borrowers in 2020.

Finally, New Tripoli's lending in 2021 to low-income borrowers was reasonable. In 2021, over 9% of the bank's HMDA loans (19 loans) were originated to low-income borrowers, matching the performance of aggregate lenders (9%). Both the bank's performance and that of aggregate lenders were significantly lower than the proxy of families by family income (23%). By product type, New Tripoli made 6% of home purchase loans, 11% of refinance loans, 33% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to low-income borrowers in 2021. Comparatively, aggregate lenders made 12% of home purchase loans, 7% of refinance loans, 7% of home improvement loans, just under 1% of loans with purpose "not applicable," and no multifamily loans to low-income borrowers in 2021.

As indicated previously, quality affordable housing was noted as an important need in the Allentown, PA assessment area. However, it is recognized that a large percentage of renters in the assessment area (52%) 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. This fact helps to explain why both the bank and aggregate lending data trail far behind the proxy for low-income families in the assessment area.

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

Although challenges and obstacles to homeownership also exist for moderate-income families and individuals, New Tripoli's overall level of HMDA lending in the Allentown, PA assessment area to moderate-income borrowers was higher than its lending to low-income borrowers, and was reasonable overall.

In 2018, the bank's lending to moderate-income borrowers was reasonable. In 2018, 17% of the bank's HMDA loans (33 loans) were originated to moderate-income borrowers, which fell just below both aggregate performance (21%) and proxy (19%). By loan type, New Tripoli made 17% of home purchase loans, 19% of refinance loans, 24% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to moderate-income borrowers in 2018. Comparatively, aggregate lenders made 23% of home purchase loans, 20% of refinance loans, 16% of home improvement loans, 1% of multifamily loans, and 1% of loans with purpose "not applicable" to moderate-income borrowers in 2018.

In 2019, the bank's lending to moderate-income borrowers was reasonable. In 2019, 20% of the bank's HMDA loans (44 loans) were originated to moderate-income borrowers, which fell just below aggregate performance (21%), and just above proxy (19%). By loan type, New Tripoli made 24% of home purchase loans, 16% of refinance loans, 21% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to moderate-income borrowers in 2019. Comparatively, aggregate lenders made 25% of home purchase loans, 16% of refinance loans, 18% of home improvement loans, just under 1% of loans with purpose "not applicable," and no multifamily loans to moderate-income borrowers in 2019.

In 2020, the bank's lending to moderate-income borrowers was reasonable. In 2020, 14% of the bank's HMDA loans (30 loans) were originated to moderate-income borrowers, which fell below both aggregate performance (18%) and proxy (19%). By loan type, New Tripoli made 14% of home purchase loans, 14% of refinance loans, 17% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to moderate-income borrowers in 2020. Comparatively, aggregate lenders made 25% of home purchase loans, 14% of refinance loans, 15% of home improvement loans, 1% of multifamily loans, and less than 1% of loans with purpose "not applicable" to moderate-income borrowers in 2020.

Finally, in 2021, the bank's lending to moderate-income borrowers was reasonable. In 2021, 13% of the bank's HMDA loans (27 loans) were originated to moderate-income borrowers, which fell below both aggregate performance (20%) and proxy (19%). By loan type, New Tripoli made 13% of home purchase loans, 11% of refinance loans, 17% of home improvement loans, and no multifamily, or loans with purpose "not applicable" to moderate-income borrowers in 2021. Comparatively, aggregate lenders made 24% of home purchase loans, 18% of refinance loans, 15% of home improvement loans, and no multifamily or loans with purpose "not applicable" or multifamily loans to moderate-income borrowers in 2021.

### **Small Business Lending**

An analysis of New Tripoli's borrower distribution of small business loans reflects reasonable penetration among business customers of different sizes, including small businesses. 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.

The number of businesses operating in the Allentown, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to available Dun & Bradstreet business data in 2018, there were 21,049 businesses operating in the assessment area, with 19,077 (91%) designated as small businesses. In 2019, 21,172 businesses operated in the assessment area, 19,232 (91%) of which were small businesses. In 2020, 20,174 businesses operated in the assessment area, 18,308 (91%) of which were small businesses. Finally, in 2021, Dun & Bradstreet data indicate that there were 19,767 businesses operating in the assessment area, 17,918 (91%) of which were small businesses.

As previously mentioned, New Tripoli is not a CRA small business reporter, and as such, a sample of 45 of the bank's small business loans from the period spanning 2018 through 2021 was used to evaluate small business lending performance.

In 2018, New Tripoli's borrower distribution of small business loans was reasonable. Of the sample of 13 small business loans made by the bank in 2018, 77% were originated to small businesses with gross annual revenues of \$1 million or less. This compares favorably to the performance of aggregate lenders, who originated 47% of loans to small businesses, but was below the percentage of small businesses in the assessment area (91%).

Small business loans were further analyzed to determine the extent of loans originated in an amount of \$100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus, added weight is given to such loans in determining whether an institution is meeting credit needs of smaller businesses. In 2018, 39% of small business loans were extended in amounts of \$100 thousand or less, compared with 93% of loans made by aggregate lenders.

In 2019, the bank's borrower distribution of small business loans was reasonable. Of the 13 loans made in the Allentown, PA assessment area in 2019, 77% were originated to small businesses with gross annual revenues of \$1 million or less. This compares favorably to the performance of aggregate lenders, who originated 49% of loans to small businesses, but is below the proxy of small businesses in the assessment area (91%). In 2019, 54% of small business loans were extended in amounts of \$100 thousand or less, compared to 93% of loans made by aggregate lenders.

In 2020, the bank's borrower distribution of small business loans was reasonable. Of the 12 small business loans made in the Allentown, PA assessment area in 2020, 50% were originated to small businesses with gross annual revenues of \$1 million or less. This compares favorably to the performance of aggregate lenders, who originated 43% of loans to small businesses, but is below the proxy of small businesses in the assessment area (91%). In 2020, 25% of small business loans were extended in amounts of \$100 thousand or less, compared to 86% of loans made by aggregate lenders.

Finally, in 2021, the bank's borrower distribution of small business loans was reasonable. Of the seven small business loans made in the Allentown, PA assessment area in 2021, 71% were originated to small businesses with gross annual revenues of \$1 million or less. This compares favorably to the performance of aggregate lenders, who originated 49% of loans to small businesses, but is below the proxy of small businesses in the assessment area (91%). In 2021, 14% of small business loans were extended in amounts of \$100 thousand or less, compared to 91% of loans made by aggregate lenders.

### **Geographic Distribution of Lending**

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects poor penetration throughout the Allentown, PA assessment area, including low- and moderate-income tracts. As in the borrower distribution analysis, HMDA loans were given greater weight than small business loans in determining this conclusion as a result of relative lending volumes.

### **Home Mortgage Lending**

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

According to the 2015 ACS data, which was used as a proxy for lending in 2018, 2019, 2020 and 2021, just under 5% of owner-occupied units were located in the assessment area's 14 low-income tracts, and nearly 15% of owner-occupied units were located in the 21 moderate-income tracts. The vast majority of owner-occupied units were located in middle-income tracts (45%) and upper-income tracts (almost 36%).

The following tables present New Tripoli's geographic distribution of HMDA loans from 2018 through 2021, in comparison to the applicable owner-occupied housing proxy, and the aggregate lending levels in the assessment area for the evaluation period. The tables on the following page rely on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

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New Tripoli Bank Allentown, PA Assessment Area Geographic Distribution of HMDA Loans					
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison			
		2018		2019	
		% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending
Low	4.5	2.1	6.5	6.8	6.3
Moderate	14.8	4.2	17.0	4.5	16.3
Middle	45.2	52.6	41.9	52.3	41.9
Upper	35.5	41.1	34.6	36.4	35.5
Unknown	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

New Tripoli Bank Allentown, PA Assessment Area Geographic Distribution of HMDA Loans					
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison			
		2020		2021	
		% New Tripoli Lending	% Aggregate Lending	% New Tripoli Lending	% Aggregate Lending
Low	4.5	2.3	5.2	2.5	5.3
Moderate	14.8	5.1	13.7	8.9	15.6
Middle	45.2	59.5	40.5	59.9	41.6
Upper	35.5	33.1	40.6	28.7	37.5
Unknown	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

*Lending in Low-Income Census Tracts*

It is noted that based on owner-occupied demographics, lending opportunities in low-income census tracts were fairly limited. Additionally, the bank’s three branch locations are some distance away from the low-income tracts. Despite the low percentage of owner-occupied housing units in low-income tracts, aggregate lenders did outperform the proxy in all four years, while the bank’s performance lagged both aggregate performance and the proxy of owner-occupied housing in low-income tracts in three years. As a result, New Tripoli’s HMDA lending in low-income tracts was poor.

New Tripoli’s geographic distribution of HMDA lending in low-income census tracts in 2018 was poor. In 2018, the bank made 2% of HMDA loans (four loans) in low-income tracts, which was below the performance of aggregate lenders (almost 7%) and the proxy of owner-occupied housing in low-income tracts (5%). By product type, 1% of home purchase loans, 38% of multifamily loans, and no refinance, home improvement, or loans with purpose “not applicable” were made in low-income census tracts. By comparison, aggregate lenders made 7% of home purchase loans, 5% of refinance loans, 2% of home improvement loans, 42% of multifamily loans, and 11% of loans with purpose “not applicable” in low-income census tracts.

New Tripoli's geographic distribution of HMDA loans in low-income tracts in 2019 was reasonable. The bank made 7% of its HMDA loans (15 loans) in low-income tracts, which was above the performance of aggregate lenders (6%) and the proxy of owner-occupied housing in low-income tracts (5%). By product type, 5% of home purchase loans, 9% of refinance loans, 7% of home improvement loans, 17% of multifamily loans, and no loans with purpose "not applicable" were made in low-income census tracts. By comparison, aggregate lenders made 8% of home purchase loans, 3% of refinance loans, 3% of home improvement loans, 31% of multifamily loans, and 15% of loans with purpose "not applicable" in low-income census tracts in 2019.

New Tripoli's geographic distribution of HMDA loans in low-income tracts within the Allentown, PA assessment area in 2020 was poor. New Tripoli made 2% of HMDA loans (five loans) in low-income tracts, which was below the performance of aggregate lenders and the proxy of owner-occupied housing in low-income tracts (both 5%). By product type, 4% of the bank's home purchase loans, 1% of refinance loans, and no home improvement, multifamily, or loans with purpose "not applicable" were made in low-income census tracts. By comparison, aggregate lenders made 8% of home purchase loans, 3% of refinance loans, 2% of home improvement loans, 35% of multifamily loans, and 10% of loans with purpose "not applicable" in low-income census tracts in 2020.

Finally, New Tripoli's geographic distribution of HMDA loans in low-income census tracts in 2021 was poor. The bank made under 3% of HMDA loans (five loans) in low-income tracts. This performance was below that of aggregate lenders (5%) and the proxy of owner-occupied housing in low-income tracts (5%). By product type, 3% of home purchase loans, 3% of refinance loans, and no home improvement, multifamily, or loans with purpose "not applicable" were made in low-income census tracts. By comparison, aggregate lenders made 8% of home purchase loans, 3% of refinance loans, 3% of home improvement loans, 36% of multifamily loans, and 9% of loans with purpose "not applicable" in low-income census tracts in 2021.

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

New Tripoli's HMDA lending in moderate-income tracts was poor. While the bank did make more loans in moderate-income tracts than it did in low-income tracts, its volume significantly lagged that of both aggregate lenders and the proxy of owner-occupied housing in moderate-income tracts for each year evaluated.

In 2018, New Tripoli's geographic distribution of HMDA loans in moderate-income census tracts was poor. New Tripoli made 4% of HMDA loans (eight loans) in moderate-income tracts, which was far below the performance of aggregate lenders (17%) and the proxy of owner-occupied housing in moderate-income tracts (15%). By product type, New Tripoli made 5% of home purchase loans, 3% of refinance loans, 12% of home improvement loans, and no multifamily or loans with purpose "not applicable" in moderate-income census tracts. By comparison, aggregate lenders made 19% of home purchase loans, 14% of refinance loans, 11% of home improvement loans, 22% of multifamily loans, and 24% of loans with purpose "not applicable" in moderate-income census tracts in 2018.

In 2019, New Tripoli's geographic distribution of HMDA loans in moderate-income tracts in the Allentown, PA assessment area was poor. The bank made 5% of HMDA loans (10 loans) in moderate-income tracts, which was significantly below the performance of aggregate lenders (16%) and the proxy of owner-occupied housing in moderate-income tracts (15%). By product type, 5% of home purchase loans, 4% of refinance loans, 7% of home improvement loans, 17% of multifamily loans, and no loans with purpose "not applicable" were made in moderate-income census tracts. By comparison, aggregate lenders made 19% of home purchase loans, 12% of refinance loans, 10% of home improvement loans, 28% of multifamily loans, and 26% of loans with purpose "not applicable" in moderate-income census tracts in 2019.

In 2020, New Tripoli's geographic distribution of HMDA loans in moderate-income census tracts was poor. New Tripoli made 5% of HMDA loans (11 loans) in moderate-income tracts. This performance was below that of aggregate lenders (14%) and the proxy of owner-occupied housing in moderate-income tracts (15%). By product type, 6% of home purchase loans, 1% of refinance loans, 17% of home improvement loans, 22% of multifamily loans, and no loans with purpose "not applicable" were in moderate-income census tracts. By comparison, aggregate lenders made 19% of home purchase loans, 9% of refinance loans, 11% of home improvement loans, 27% of multifamily loans, and 28% of loans with purpose "not applicable" in moderate-income census tracts in 2020.

Finally, in 2021, New Tripoli's geographic distribution of HMDA loans in moderate-income census tracts was poor. The bank made 9% of HMDA loans (18 loans) in moderate-income tracts, which was below the performance of aggregate lenders (16%) and the proxy of owner-occupied housing in moderate-income tracts (15%). By product type, 10% of home purchase loans, 9% of refinance loans, 8% of home improvement loans, 17% of multifamily loans, and no loans with purpose "not applicable" were in moderate-income census tracts. By comparison, aggregate lenders made 21% of home purchase loans, 12% of refinance loans, 13% of home improvement loans, 32% of multifamily loans, and 30% of loans with purpose "not applicable" in moderate-income census tracts in 2021.

### **Small Business Lending**

The geographic distribution of New Tripoli's small business loans reflects reasonable penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period. As indicated previously, because the bank is not a small business reporter, conclusions are based on a sample of 45 small business loans made in 2018, 2019, 2020 and 2021.

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 2018 Dun & Bradstreet data, 9% of the businesses in the assessment area were located in low-income census tracts, and 19% were located in middle-income tracts. The majority of businesses were located in middle- and upper-income tracts. More specifically, just over 39% of businesses in the assessment area were located in middle-income tracts, and the remaining 33% were located in upper-income tracts. The geographic distribution of businesses changed very little in 2019, 2020 and 2021.

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The following tables present New Tripoli’s small business geographic distribution in comparison to the business proxy and aggregate lending levels for the years evaluated.

<b>New Tripoli Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans 2018</b>			
<b>Census Tract Income Level</b>	<b>% Businesses by Tract Income Level (2015 ACS Data)</b>	<b>Aggregate Comparison</b>	
		<b>% New Tripoli Lending</b>	<b>% Aggregate Lending</b>
Low	8.9	7.7	8.8
Moderate	18.6	0.0	19.1
Middle	39.3	61.5	37.2
Upper	33.2	30.8	34.2
Tract Unknown	0.0	0.0	0.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>New Tripoli Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans 2019</b>			
<b>Census Tract Income Level</b>	<b>% Businesses by Tract Income Level (2015 ACS Data)</b>	<b>Aggregate Comparison</b>	
		<b>% New Tripoli Lending</b>	<b>% Aggregate Lending</b>
Low	9.0	0.0	8.4
Moderate	18.7	15.4	18.7
Middle	39.3	46.2	37.6
Upper	33.0	38.4	34.6
Tract Unknown	0.0	0.0	0.7
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>New Tripoli Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans 2020</b>			
<b>Census Tract Income Level</b>	<b>% Businesses by Tract Income Level (2015 ACS Data)</b>	<b>Aggregate Comparison</b>	
		<b>% New Tripoli Lending</b>	<b>% Aggregate Lending</b>
Low	8.9	8.3	8.5
Moderate	18.7	8.3	18.8
Middle	38.9	75.0	38.1
Upper	33.5	8.4	34.3
Tract Unknown	0.0	0.0	0.3
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>New Tripoli Bank Allentown, PA Assessment Area Geographic Distribution of Small Business Loans 2021</b>			
<b>Census Tract Income Level</b>	<b>% Businesses by Tract Income Level (2015 ACS Data)</b>	<b>Aggregate Comparison</b>	
		<b>% New Tripoli Lending</b>	<b>% Aggregate Lending</b>
Low	9.2	14.3	8.5
Moderate	18.5	42.9	19.8
Middle	38.4	14.3	37.2
Upper	33.9	28.6	34.1
Tract Unknown	0.0	0.0	0.4
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

*Lending in Low-Income Census Tracts*

Overall, New Tripoli's small business lending in low-income tracts was reasonable.

New Tripoli's geographic distribution of small business loans in 2018 in low-income census tracts was reasonable. Of the 2018 small business loan sample, the bank made one loan (8%) in a low-income census tract within the assessment area, which fell just below both aggregate lending in low-income tracts (9%) and the proxy of businesses located in low-income tracts (9%).

The bank's 2019 small business lending in low-income tracts was poor. Of the loan sample, the bank made no small business loans in low-income tracts in 2019. In comparison, aggregate lenders made 8% of small business loans in low-income tracts, and the proxy of businesses located in low-income tracts was 9%.

New Tripoli's 2020 small business lending in low-income tracts was reasonable. Of the sample, the bank made one loan (8%) in a low-income census tract within the assessment area. This fell just below aggregate lending in low-income tracts (9%) and the proxy of businesses located in low-income tracts (9%).

Finally, New Tripoli's 2021 small business lending in low-income tracts was reasonable. Of the sample, the bank made one loan (14%) in a low-income census tract within the assessment area. This was above the aggregate lending in low-income tracts (9%) and the proxy of businesses located in low-income tracts (9%).

*Lending in Moderate-Income Census Tracts*

Overall, the bank's small business lending in moderate-income tracts was reasonable.

New Tripoli's 2018 small business lending in moderate-income tracts was poor. Of the loan sample, the bank made no small business loans in moderate-income tracts in 2018. Comparatively, aggregate lenders made 19% of small business loans in moderate-income tracts, and the proxy of businesses located in moderate-income tracts was 19%.

The bank's 2019 small business lending in moderate-income tracts was reasonable. Of the sample, the bank made two loans (15%) in moderate-income census tracts within the assessment area. This performance fell below aggregate lending in moderate-income tracts (19%) and the proxy of businesses located in moderate-income tracts (19%).

New Tripoli's 2020 small business lending in moderate-income tracts was reasonable. Of the sample, the bank made one loan (8%) in a moderate-income census tract within the assessment area. This fell below aggregate lending in moderate-income tracts (19%) and the proxy of businesses located in moderate-income tracts (19%).

Finally, New Tripoli's 2021 small business lending in moderate-income tracts was reasonable. Of the sample, the bank made three loans (43%) in moderate-income census tracts within the assessment area. This lending performance was above aggregate lending in moderate-income tracts (20%) and the proxy of businesses located in moderate-income tracts (19%).

### **Response to Substantiated Complaints**

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

### **COMMUNITY DEVELOPMENT TEST**

New Tripoli's performance under the community development test is rated satisfactory. The bank's mix of community development loans, qualified investments, and community development services demonstrates adequate responsiveness to the community development needs of the Allentown, PA assessment area, considering the bank's capacity and the need for and availability of such opportunities for community development in the assessment area. As indicated previously, community development activities were reviewed for the entire evaluation period, from February 6, 2018 through January 9, 2023.

#### **Community Development Loans**

During the period evaluated, the bank originated 17 qualified community development loans, totaling \$8.7 million. Of these loans, nine loans aggregating \$6 million (69%) were to organizations that provide affordable housing in the assessment area. These initiatives included building and rehabilitating affordable homes for low- and moderate-income families, and financing affordable rental housing in the assessment area. In addition, six loans totaling \$2.4 million (28%) were made to organizations that promote economic development through the financing of small businesses or farms in the assessment area. Finally, two loans totaling \$310 thousand (just under 4%) revitalized / stabilized areas of the city of Allentown, PA under the Allentown Vision 2030 Project.

#### **Community Development Investments**

New Tripoli made no qualified community development investments during the evaluation period. However, the bank made 49 qualified community development donations, totaling just under \$187 thousand in the assessment area during the evaluation period. Of the total, the overwhelming majority of donations (98% or over \$183 thousand) provided community services to low- and moderate-income individuals, while the remaining donations (2% or nearly \$4 thousand) provided affordable housing for low- and moderate-income individuals. Donations went to various organizations, including several food banks, after school programs for low- and moderate-income families, and affordable housing organizations such as Habitat for Humanity.

#### **Community Development Services**

New Tripoli provided community development services in its Allentown, PA assessment area. More specifically, New Tripoli's officers and employees provided technical expertise by serving on the boards and operating committees of community development organizations. Noteworthy examples of the bank's participation with community development organizations include:

- A bank employee serves as a Board Member and Finance Committee Member for the Housing & Development Corporation (HADC). HADC is a nonprofit housing development agency in the city of Allentown that works to revitalize neighborhoods through the development of affordable housing and job training.
- A bank employee serves as a Board Member of the Lehigh Valley Chamber of Commerce Small Business Council, which promotes small business growth and sustainability in the area.
- A bank officer serves as a Board Member of the Greater Northern Lehigh Valley Chamber of Commerce, which serves Lehigh Valley local businesses.
- A bank employee serves as a Board Member and Secretary for Valley Housing Development Corporation, which administers subsidized housing programs for the benefit of low- and moderate-income individuals in Lehigh County.
- A bank officer provided financial literacy training to high school students at a school where students are predominantly from low- to moderate-income families.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES**

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

**CRA APPENDICES**

## **CRA APPENDIX A: GLOSSARY**

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

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

**Community development:** All Agencies have adopted the following language.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**CRA APPENDIX B: HMDA LOAN DISTRIBUTION TABLES**

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2018 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	1	1.2%	126	0.7%	5	5.9%	699	3.8%
Moderate	4	4.7%	351	1.9%	14	16.5%	2,110	11.5%
Middle	37	43.5%	7,983	43.5%	21	24.7%	3,842	20.9%
Upper	43	50.6%	9,889	53.9%	40	47.1%	11,185	61.0%
Unknown	0	0.0%	0	0.0%	5	5.9%	513	2.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>85</b>	<b>100.0%</b>	<b>18,350</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>	<b>18,350</b>	<b>100.0%</b>
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	9	13.2%	842	8.0%
Moderate	2	2.9%	270	2.6%	13	19.1%	1,464	13.9%
Middle	40	58.8%	5,819	55.2%	13	19.1%	1,610	15.3%
Upper	26	38.2%	4,461	42.3%	27	39.7%	5,707	54.1%
Unknown	0	0.0%	0	0.0%	6	8.8%	927	8.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>68</b>	<b>100.0%</b>	<b>10,550</b>	<b>100.0%</b>	<b>68</b>	<b>100.0%</b>	<b>10,550</b>	<b>100.0%</b>
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	1	5.9%	5	0.5%
Moderate	2	11.8%	148	14.3%	4	23.5%	72	6.9%
Middle	10	58.8%	285	27.7%	2	11.8%	53	5.1%
Upper	5	29.4%	598	58.0%	8	47.1%	754	73.2%
Unknown	0	0.0%	0	0.0%	2	11.8%	148	14.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>1,031</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>1,031</b>	<b>100.0%</b>
<b>Multi-Family</b>								
Low	3	37.5%	1,596	25.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	5	62.5%	4,776	75.0%	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%	8	100.0%	6,372	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>6,372</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>6,372</b>	<b>100.0%</b>
<b>Other Purpose LOC</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Other Purpose Closed/Exempt</b>								
Low	0	0.0%	0	0.0%	2	14.3%	61	6.6%
Moderate	0	0.0%	0	0.0%	2	14.3%	63	6.8%
Middle	9	64.3%	592	64.2%	5	35.7%	483	52.4%
Upper	5	35.7%	330	35.8%	5	35.7%	315	34.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>922</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>922</b>	<b>100.0%</b>
<b>Loan Purpose Not Applicable</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>HMDA Totals</b>								
Low	4	2.1%	1,722	4.6%	17	8.9%	1,606	4.3%
Moderate	8	4.2%	769	2.1%	33	17.2%	3,708	10.0%
Middle	101	52.6%	19,456	52.3%	41	21.4%	5,988	16.1%
Upper	79	41.1%	15,278	41.0%	80	41.7%	17,962	48.3%
Unknown	0	0.0%	0	0.0%	21	10.9%	7,960	21.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>192</b>	<b>100.0%</b>	<b>37,225</b>	<b>100.0%</b>	<b>192</b>	<b>100.0%</b>	<b>37,225</b>	<b>100.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2019 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	5	4.8%	645	3.2%	4	3.8%	493	2.4%
Moderate	5	4.8%	646	3.2%	25	24.0%	4,152	20.4%
Middle	60	57.7%	10,658	52.4%	21	20.2%	3,617	17.8%
Upper	34	32.7%	8,409	41.3%	36	34.6%	9,754	47.9%
Unknown	0	0.0%	0	0.0%	18	17.3%	2,343	11.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>104</b>	<b>100.0%</b>	<b>20,358</b>	<b>100.0%</b>	<b>104</b>	<b>100.0%</b>	<b>20,358</b>	<b>100.0%</b>
<b>Refinance</b>								
Low	8	9.3%	793	5.8%	13	15.1%	1,146	8.4%
Moderate	3	3.5%	270	2.0%	14	16.3%	1,983	14.6%
Middle	38	44.2%	4,956	36.5%	16	18.6%	2,480	18.2%
Upper	37	43.0%	7,578	55.7%	28	32.6%	6,116	45.0%
Unknown	0	0.0%	0	0.0%	15	17.4%	1,873	13.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>86</b>	<b>100.0%</b>	<b>13,597</b>	<b>100.0%</b>	<b>86</b>	<b>100.0%</b>	<b>13,597</b>	<b>100.0%</b>
<b>Home Improvement</b>								
Low	1	7.1%	60	10.2%	2	14.3%	125	21.3%
Moderate	1	7.1%	15	2.6%	3	21.4%	105	17.9%
Middle	7	50.0%	325	55.3%	2	14.3%	65	11.1%
Upper	5	35.7%	188	32.0%	5	35.7%	248	42.2%
Unknown	0	0.0%	0	0.0%	2	14.3%	45	7.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>588</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>588</b>	<b>100.0%</b>
<b>Multi-Family</b>								
Low	1	16.7%	764	15.1%	0	0.0%	0	0.0%
Moderate	1	16.7%	1,000	19.7%	0	0.0%	0	0.0%
Middle	3	50.0%	940	18.6%	0	0.0%	0	0.0%
Upper	1	16.7%	2,360	46.6%	1	16.7%	280	5.5%
Unknown	0	0.0%	0	0.0%	5	83.3%	4,784	94.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>5,064</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>5,064</b>	<b>100.0%</b>
<b>Other Purpose LOC</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Other Purpose Closed/Exempt</b>								
Low	0	0.0%	0	0.0%	2	16.7%	76	11.3%
Moderate	0	0.0%	0	0.0%	2	16.7%	31	4.6%
Middle	8	66.7%	581	86.5%	1	8.3%	85	12.6%
Upper	4	33.3%	91	13.5%	6	50.0%	465	69.2%
Unknown	0	0.0%	0	0.0%	1	8.3%	15	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>672</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>672</b>	<b>100.0%</b>
<b>Loan Purpose Not Applicable</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>HMDA Totals</b>								
Low	15	6.8%	2,262	5.6%	21	9.5%	1,840	4.6%
Moderate	10	4.5%	1,931	4.8%	44	19.8%	6,271	15.6%
Middle	116	52.3%	17,460	43.3%	40	18.0%	6,248	15.5%
Upper	81	36.5%	18,627	46.2%	76	34.2%	16,862	41.9%
Unknown	0	0.0%	0	0.0%	41	18.5%	9,059	22.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>222</b>	<b>100.0%</b>	<b>40,280</b>	<b>100.0%</b>	<b>222</b>	<b>100.0%</b>	<b>40,280</b>	<b>100.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2020 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	4	4.0%	329	1.5%	4	4.0%	600	2.8%
Moderate	6	5.9%	778	3.6%	14	13.9%	2,685	12.4%
Middle	61	60.4%	13,677	63.0%	16	15.8%	3,054	14.1%
Upper	30	29.7%	6,918	31.9%	48	47.5%	12,789	58.9%
Unknown	0	0.0%	0	0.0%	19	18.8%	2,573	11.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>101</b>	<b>100.0%</b>	<b>21,701</b>	<b>100.0%</b>	<b>101</b>	<b>100.0%</b>	<b>21,701</b>	<b>100.0%</b>
<b>Refinance</b>								
Low	1	1.2%	216	1.2%	10	11.8%	961	5.5%
Moderate	1	1.2%	113	0.6%	12	14.1%	1,575	9.1%
Middle	48	56.5%	9,411	54.2%	13	15.3%	2,651	15.3%
Upper	35	41.2%	7,626	43.9%	44	51.8%	11,198	64.5%
Unknown	0	0.0%	0	0.0%	6	7.1%	980	5.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>85</b>	<b>100.0%</b>	<b>17,365</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>	<b>17,365</b>	<b>100.0%</b>
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	2	16.7%	19	2.9%
Moderate	2	16.7%	202	32.0%	2	16.7%	126	20.0%
Middle	7	58.3%	338	53.4%	0	0.0%	0	0.0%
Upper	3	25.0%	92	14.6%	5	41.7%	235	37.2%
Unknown	0	0.0%	0	0.0%	3	25.0%	252	39.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>632</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>632</b>	<b>100.0%</b>
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	22.2%	1,090	11.1%	0	0.0%	0	0.0%
Middle	6	66.7%	7,337	74.7%	0	0.0%	0	0.0%
Upper	1	11.1%	1,400	14.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	9	100.0%	9,826	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>9,826</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>9,826</b>	<b>100.0%</b>
<b>Other Purpose LOC</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Other Purpose Closed/Exempt</b>								
Low	0	0.0%	0	0.0%	2	25.0%	66	19.1%
Moderate	0	0.0%	0	0.0%	2	25.0%	80	23.2%
Middle	6	75.0%	274	79.4%	1	12.5%	21	6.1%
Upper	2	25.0%	71	20.6%	3	37.5%	178	51.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>345</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>345</b>	<b>100.0%</b>
<b>Loan Purpose Not Applicable</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>HMDA Totals</b>								
Low	5	2.3%	545	1.1%	18	8.4%	1,645	3.3%
Moderate	11	5.1%	2,182	4.4%	30	14.0%	4,465	9.0%
Middle	128	59.5%	31,036	62.2%	30	14.0%	5,726	11.5%
Upper	71	33.0%	16,107	32.3%	100	46.5%	24,401	48.9%
Unknown	0	0.0%	0	0.0%	37	17.2%	13,632	27.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>215</b>	<b>100.0%</b>	<b>49,869</b>	<b>100.0%</b>	<b>215</b>	<b>100.0%</b>	<b>49,869</b>	<b>100.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2021 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	2	2.8%	424	2.3%	4	5.6%	564	3.0%
Moderate	7	9.9%	1,889	10.2%	9	12.7%	2,135	11.5%
Middle	40	56.3%	10,324	55.5%	15	21.1%	3,176	17.1%
Upper	22	31.0%	5,949	32.0%	25	35.2%	8,914	48.0%
Unknown	0	0.0%	0	0.0%	18	25.4%	3,797	20.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>71</b>	<b>100.0%</b>	<b>18,586</b>	<b>100.0%</b>	<b>71</b>	<b>100.0%</b>	<b>18,586</b>	<b>100.0%</b>
<b>Refinance</b>								
Low	3	3.1%	226	1.1%	11	11.2%	911	4.4%
Moderate	9	9.2%	992	4.8%	11	11.2%	1,555	7.6%
Middle	60	61.2%	12,939	62.9%	20	20.4%	4,061	19.7%
Upper	26	26.5%	6,406	31.2%	47	48.0%	13,036	63.4%
Unknown	0	0.0%	0	0.0%	9	9.2%	1,001	4.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>98</b>	<b>100.0%</b>	<b>20,564</b>	<b>100.0%</b>	<b>98</b>	<b>100.0%</b>	<b>20,564</b>	<b>100.0%</b>
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	4	33.3%	150	12.2%
Moderate	1	8.3%	50	4.1%	2	16.7%	105	8.6%
Middle	5	41.7%	499	40.7%	0	0.0%	0	0.0%
Upper	6	50.0%	678	55.3%	6	50.0%	972	79.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>1,227</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>1,227</b>	<b>100.0%</b>
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	16.7%	464	14.5%	0	0.0%	0	0.0%
Middle	5	83.3%	2,738	85.5%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	16.7%	675	21.1%
Unknown	0	0.0%	0	0.0%	5	83.3%	2,527	78.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>3,202</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>3,202</b>	<b>100.0%</b>
<b>Other Purpose LOC</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Other Purpose Closed/Exempt</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	5	33.3%	275	19.8%
Middle	11	73.3%	1,102	79.5%	8	53.3%	853	61.6%
Upper	4	26.7%	284	20.5%	2	13.3%	258	18.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>1,386</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>1,386</b>	<b>100.0%</b>
<b>Loan Purpose Not Applicable</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>HMDA Totals</b>								
Low	5	2.5%	650	1.4%	19	9.4%	1,625	3.6%
Moderate	18	8.9%	3,395	7.6%	27	13.4%	4,070	9.1%
Middle	121	59.9%	27,602	61.4%	43	21.3%	8,090	18.0%
Upper	58	28.7%	13,317	29.6%	81	40.1%	23,854	53.1%
Unknown	0	0.0%	0	0.0%	32	15.8%	7,325	16.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>202</b>	<b>100.0%</b>	<b>44,964</b>	<b>100.0%</b>	<b>202</b>	<b>100.0%</b>	<b>44,964</b>	<b>100.0%</b>

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

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>								
Low	1	7.7%	126	5.9%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	8	61.5%	1,278	59.8%	0	0.0%	0	0.0%
Upper	4	30.8%	732	34.3%	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%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>2,136</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Revenue</b>								
Total \$1 Million or Less	10	76.9%	1,277	59.8%	0	0.0%	0	0.0%
Over \$1 Million	3	23.1%	859	40.2%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>2,136</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size</b>								
\$100,000 or less	5	38.5%	164	7.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	6	46.2%	1,124	52.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	15.4%	848	39.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>2,136</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size and Revenue \$1 Million or Less</b>								
\$100,000 or less	5	50.0%	164	12.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	40.0%	765	59.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	10.0%	348	27.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>1,277</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	15.4%	284	13.8%	0	0.0%	0	0.0%
Middle	6	46.250.0%	1,612	78.3%	0	0.0%	0	0.0%
Upper	5	38.533.3%	163	7.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>2,059</b>	<b>100.0%</b>	<b>1</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Revenue</b>								
Total \$1 Million or Less	10	76.9%	1,127	54.7%	0	0.0%	0	0.0%
Over \$1 Million	3	23.1%	932	45.3%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>2,059</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size</b>								
\$100,000 or less	7	53.8%	178	8.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	30.8%	684	33.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	15.4%	1,197	58.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>2,059</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size and Revenue \$1 Million or Less</b>								
\$100,000 or less	6	60.0%	118	10.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	30.0%	509	45.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	10.0%	500	44.4%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>1,127</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>								
Low	1	8.3%	160	1.9%	0	0.0%	0	0.0%
Moderate	1	8.3%	280	3.3%	0	0.0%	0	0.0%
Middle	9	75.0%	8,108	94.6%	0	0.0%	0	0.0%
Upper	1	8.3%	21	0.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>8,569</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Revenue</b>								
Total \$1 Million or Less	6	50.0%	741	8.6%	0	0.0%	0	0.0%
Over \$1 Million	6	50.0%	7,828	91.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>8,569</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size</b>								
\$100,000 or less	3	25.0%	91	1.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	33.3%	665	7.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	16.7%	813	9.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)- \$500k (Farm)	3	25.0%	7,000	81.7%	0	0.0%	0	0.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>8,569</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size and Revenue \$1 Million or Less</b>								
\$100,000 or less	3	50.0%	91	12.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	33.3%	370	49.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	1	16.7%	280	37.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>741</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**INTERMEDIATE SMALL INSTITUTION PERFORMANCE EVALUATION  
JANUARY 2023**

**2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)**

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>By Tract Income</b>								
Low	1	14.3%	132	3.9%	0	0.0%	0	0.0%
Moderate	3	42.9%	628	18.4%	0	0.0%	0	0.0%
Middle	1	14.3%	1,808	53.0%	0	0.0%	0	0.0%
Upper	2	28.6%	845	24.8%	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%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>3,413</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Revenue</b>								
Total \$1 Million or Less	5	71.4%	3,031	88.8%	0	0.0%	0	0.0%
Over \$1 Million	2	28.6%	382	11.2%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>3,413</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size</b>								
\$100,000 or less	1	14.3%	8	0.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	42.9%	552	16.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	28.6%	1,045	30.6%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	14.3%	1,808	53.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>3,413</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>By Loan Size and Revenue \$1 Million or Less</b>								
\$100,000 or less	1	20.0%	8	0.2%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	20.0%	170	5.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	40.0%	1,045	34.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	1	20.0%	1,808	59.7%	0	0.0%	0	0.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>3,031</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>

**CRA APPENDIX D: ASSESSMENT AREA MAP**

ALLENTOWN, PA ASSESSMENT AREA (2015 ACS DATA)

