PUBLIC DISCLOSURE

July 16, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Jim Thorpe Neighborhood Bank
RSSD - 920210
12 Broadway
Jim Thorpe, PA 18229

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

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

Table of Contents

INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING 1

SCOPE OF EXAMINATION 1

DESCRIPTION OF INSTITUTION 3

DESCRIPTION OF ASSESSMENT AREAS 5

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS 18

ASSESSMENT AREA CONCENTRATION 19

RESPONSE TO SUBSTANTIATED COMPLAINTS 35

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES 35

CRA APPENDICES 36

CRA APPENDIX A: GLOSSARY 37

CRA APPENDIX B: HMDA LOAN DISTRIBUTION TABLES 40

CRA APPENDIX C: SMALL BUSINESS LOAN DISTRIBUTION TABLES 51

CRA APPENDIX D: ASSESSMENT AREA MAPS 57

INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

This institution is rated **Satisfactory.**

Major factors contributing to this rating include:

- The loan-to-deposit ratio is **reasonable** given the bank's size, financial condition, and assessment area credit needs.
- A **majority** of the bank's loans and other lending 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 borrowers, and businesses of different sizes.
- The geographic distribution of loans reflects **reasonable** dispersion throughout the bank's assessment area.

SCOPE OF EXAMINATION

Jim Thorpe Neighborhood Bank (JTNB) was rated Satisfactory at its previous CRA evaluation dated September 24, 2018, which was conducted using the Interagency Small Institution CRA Examination Procedures adopted by the Board of Governors of the Federal Reserve System. The current evaluation of Jim Thorpe's CRA performance covers the period from September 25, 2018 through July 16, 2024, and uses the Small Institution CRA 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 incomes, including low- and moderate-income borrowers and businesses of different sizes;
- the geographic distribution of loans within the assessment area, including lending in low- and moderate-income census tracts; and
- the bank's response to CRA complaints.

The loan products evaluated consisted of:

- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose "not

applicable," collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank in calendar years 2018, 2019, 2020, 2021 and 2022[1];
- A sample of 125 commercial loans, including 66 small business loans originated by the bank during the calendar years 2018, 2019, 2020, 2021, and 2022.

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, JTNB originated 384 HMDA loans totaling over $36 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 66 small business loans totaling over $7.7 million, originated between 2018 and 2022 in the assessment area.

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

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts are classified based on the 2015 American Community Survey (ACS) data for loans originated in 2018, 2019, 2020, and 2021, and on the basis of the updated 2020 U.S. Census data for loans made in 2022[2]. The distribution of HMDA loans to borrowers of different income levels was analyzed based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC).

All other demographic indices and statistics presented throughout this evaluation are based on the 2015 ACS data for 2018, 2019, 2020, and 2021, and updated 2020 Census data for 2022, unless otherwise noted.

As indicated earlier, JTNB does not report small business loans for purposes of the CRA, and therefore analysis of the bank's small business lending is based on a statistical sample of 125 commercial loans originated in 2018, 2019, 2020, 2021, and 2022. For small business loans, examiners compared the bank's lending to Dun & Bradstreet data. Dun & Bradstreet collects and

[1] In October 2015 and August 2017, the Consumer Financial Protection Bureau (CFPB) issued final rules amending Regulation C effective January 1, 2018. Among other changes, the final rules modified:
(1) the types of institutions subject to Regulation C (covered institutions); (2) the types of transactions subject to Regulation C (covered transactions); (3) the types of data 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 (Oct. 28, 2015) (final rule); and 82 Fed. Reg. 43088 (Sept. 13, 2017) (correction). In response to the amendments, the Board of Governors, along with the other federal agencies that implement the CRA, amended their regulations to conform to the Regulation C amendments. Of note, the definition of "home-mortgage loan" in Regulation BB was revised to mean a "closed-end mortgage loan" or an "open-end line of credit, as those terms are defined in, and not excluded transactions under, amended Regulation C. As a result, home improvement loans not secured by a dwelling, which were previously reportable under Regulation C, are no longer reported; home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the HMDA reporter, are now covered transaction under HMDA that must be reported if the institution originates 200 or more of them in each of the two preceding calendar years. Finally, "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."

[2] In accordance with Federal Financial Institutions Examination Council Policy, 2015 ACS data is used to analyze data starting in 2017 through 2021, and 2020 Census data is used to analyze data starting in 2022 and thereafter.

publishes data detailing the revenues and locations of local businesses. Because JTNB 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 Metropolitan Statistical Area (MSA). Consequently, the bank's performance was not directly compared to the lending of aggregate small business lenders. Aggregate lending data was considered for contextual purposes only.

DESCRIPTION OF INSTITUTION

JTNB was rated Satisfactory at its previous CRA evaluation dated September 24, 2018, which used the Interagency Small Institution CRA Examination Procedures.

JTNB, headquartered in Jim Thorpe, Carbon County, Pennsylvania, is a state-chartered full-service community bank offering both consumer and commercial banking products and services to its customers. JTNB is a wholly-owned subsidiary of JTNB Bancorp, Inc., a non-complex shell holding company.

The bank operates six branches throughout Carbon County in the towns of Jim Thorpe, Lehighton, Nesquehoning, and Lansford. The distribution of the branches changed using the updated 2020 Census data. More specifically, the Penn Forest branch remained a middle-income tract, and the Lansford branch remained a low-income tract, while the main branch, Center Street and Nesquehoning branches became moderate-income tracts, and the Lehighton branch became a middle-income tract.

The tables below detail the locations of JTNB's branch distribution using 2015 ACS data and 2020 Census data.

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	**Number of Branches**	**Percent of Branches**	**Population**	**Percent of Population**
Low	1	16.7	3,871	4.7
Moderate	1	16.7	25,535	31.3
Middle	4	66.6	46,921	57.6
Upper	0	0.0	5,203	6.4
Unknown Income	0	0.0	0	0.0
Totals	**6**	**100.0**	**81,530**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Retail Branch Distribution 2020 Census Data				
Census Tract Type	**Number of Branches**	**Percent of Branches**	**Population**	**Percent of Population**
Low	1	16.7	4,141	5.0
Moderate	3	50.0	28,384	34.7
Middle	2	33.3	49,332	60.3
Upper	0	0.0	0	0.0
Unknown Income	0	0.0	0	0.0
Totals	**6**	**100.0**	81,857	**100.0**

In addition to its six branch locations, JTNB offers customers alternative delivery methods, including automated teller machines (ATMs) at all six locations, drive-thru service at five locations, and telebanking and online and mobile banking, which allow customers to transfer funds between accounts, obtain account balances, use online bill pay services, and conduct other basic account services. JTNB also has a limited standalone ATM located at a market in Jim Thorpe.

According to the Consolidated Reports of Condition and Income (Call Report), as of March 31, 2024, JTNB reported $238 million in total assets, of which nearly $128 million, or 54%, were loans. Since its last CRA evaluation dated September 24, 2018, the bank's assets have grown nearly 24% from almost $192 million as of June 30, 2018, to $238 million as of March 31, 2024. Similarly, the bank's loans increased since the last CRA evaluation. More specifically, loans increased 35% since the last CRA evaluation, growing from $94 million as of June 30, 2018, to almost $128 million as of March 31, 2024.

The bank is primarily a commercial lender. On a dollar volume basis, commercial loans (comprised of commercial mortgages, and commercial and industrial loans, represented the largest segment of the bank's loan portfolio, at $54 million or 42% of the total loan portfolio. Residential real estate loans (comprised of open-end and closed-end loans secured by residential properties, and multifamily homes) represented the second largest segment of the bank's portfolio at about $50 million or 39%.

The composition of the bank's loan portfolio as of March 31, 2024, is presented in the table below[3].

Jim Thorpe Neighborhood Bank		
LOANS as 03/31/2024	**$ (000s)**	**%**
Loans Secured by Nonfarm Nonresidential properties (Commercial Mortgages)	50,770	39.8
Commercial and Industrial Loans	2,887	2.3
Secured by Farmland	0	0.0
Secured by Residential Properties (Closed-end)	48,814	38.3
Secured by Residential Properties (Open-end)	1,263	1.0
Secured by Multifamily Residential Properties	95	0.1
Construction & Land Development	2,217	1.7
Consumer Loans	2,021	1.6
Loans to Finance Agricultural Production & Other Loans to Farmers	0	0.0
States and Political Subdivisions	19,432	15.2
Other Loans	0	0.0
Other Leases	0	0.0
TOTAL LOANS	**127,499**	**100**

Small Business Loans

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report, as of March 31, 2024, indicates that just under $49 million (91%) of the bank's outstanding commercial loans[4]

[3] Source: Consolidated Reports of Condition and Income (Call Report) Schedule RC-C Part 1 (Loans and Leases), as of June 30, 2023.
[4] Commercial loans are comprised of loans secured by nonfarm nonresidential properties, along with commercial and industrial loans.

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.

Jim Thorpe Neighborhood Bank Small Business Loans		
	Amount Outstanding as of 03/31/2024 $ (000s)	%
Loans with original amounts of $100,000 or less	4,180	7.8
Loans with original amounts of $100,001 through $250,000	15,943	29.7
Loans with original amounts of $250,001 to $1 million	28,748	53.6
TOTAL SMALL BUSINESS LOANS	**48,871**	**91.1**
Loans with original amounts of more than $1,000,000	4,786	8.9
TOTAL COMMERCIAL LOANS	**53,657**	**100.0**

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

DESCRIPTION OF ASSESSMENT AREAS

For the purposes of the CRA, JTNB has designated its single assessment area to include all of Carbon County, PA, and five census tracts in adjacent Schuylkill County (collectively referred to as the Carbon County, PA assessment area or the assessment area).

There have been no changes to the bank's assessment area since the previous CRA evaluation. The bank's assessment area was determined to comply with the requirements of the CRA and does not arbitrarily exclude low- or moderate-income census tracts.

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

To supplement economic, demographic and performance data, 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 evaluation. More specifically, discussions were held with an economic development organization and a community foundation within the assessment area.

Community contacts raised concerns about the lack of affordable housing, the rising costs of living, and the lack of employment opportunities in Carbon County. Both community contacts stated that there is a lack of affordable housing in the county, due to real estate investors and non-local residents purchasing the available housing stock. One community contact mentioned the need for business education partnerships between employers and area schools to advise what technical trade skills are needed for the future workforce. The second community contact stated that assessment area residents

tend to leave the county for higher paying jobs in neighboring counties. Finally, it was noted that several towns in Carbon County have become blighted, and four Carbon County towns are part of the Blueprint Communities, an initiative developed and implemented by the Federal Home Loan Bank of Pittsburgh, to revitalize older communities and neighborhoods.

2015 ACS Data

According to the 2015 ACS data, the bank's Carbon County, PA assessment area included 17 census tracts. Of the 17 census tracts, one (6%) was designated as a low-income tract, six (35%) were moderate-income tracts, nine (53%) were middle-income tracts, and one (6%) was an upper-income tract. The one low-income census tract was located in Lansford, PA, and three of the six moderate-income tracts were located in Carbon County, while the other three moderate-income tracts were located in Schuylkill County. According to the 2015 ACS data, the assessment area had a population of 81,530, with 36% of the population residing in the low- and moderate-income census tracts.

2020 Census Data

Using the 2020 Census data, the assessment area consisted of 22 census tracts. Of the total, one was designated as a low-income tract (5%), eight were designated as moderate-income tracts (36%), and 13 (59%) were designated as middle-income tracts. The assessment area contained no upper-income tracts according to the 2020 Census data. The assessment area's population increased very slightly to 81,857, with almost 40% of the population residing in the low- and moderate-income tracts. Maps of the assessment area at the 2015 ACS update, and the 2020 Census are available in Appendix D.

JTNB's CRA performance was evaluated in terms of the demographic and economic context in which the bank operates. According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, as of June 30, 2023, there are five depository institutions operating 17 branches in Carbon County, PA. These branches hold $1 billion in deposits, with JTNB ranked second with $211 million in deposits, or 20% of the deposit market share. Mauch Chunk Trust Company ranked first with 38% of the deposit market share, and First Northern Bank and Trust Company ranked third with 19% of the deposit market share.

As mentioned previously, JTNB reports home-mortgage pursuant to HMDA, and was compared to the aggregate of all lenders in the Carbon County, PA assessment area reporting real estate loans pursuant to the HMDA. These data are reported annually.

According to the 2018 data, there were 229 HMDA reporters in the assessment area, who originated or purchased a total of 2,259 HMDA loans. JTNB ranked fourth with 83 loans or just under 4% of the HMDA market. Wells Fargo Bank, N.A. led the market with nearly 9% of the market share, followed by Quicken Loans, LLC with 5% of the market, and Mauch Chunk Trust Company with under 5% of the HMDA market.

In 2019, there were 234 HMDA reporters in the assessment area, who originated or purchased a total of 2,459 HMDA loans. JTNB ranked tenth with 59 loans or 2% of the HMDA market. Once again,

Wells Fargo Bank, N.A. ranked first with nearly 8% of the market, followed by Quicken Loans, LLC with 5% of the market, and Mauch Chunk Trust Company with under 4% of the HMDA market.

In 2020, there were 289 HMDA reporters in the assessment area, who originated or purchased a total of 3,151 HMDA loans. JTNB was ranked seventh with 84 loans or under 3% of the HMDA market. Quicken Loans, LLC ranked first with 7% of the market, followed by Wells Fargo Bank, N.A. with nearly 7% of the market, and Mauch Chunk Trust Company with 3% of the market share.

In 2021, there were 309 HMDA reporters in the assessment area, who originated or purchased a total of 3,819 HMDA loans. JTNB was ranked ninth with 78 loans or 2% of the HMDA market. Rocket Mortgage, LLC ranked first with nearly 9% of the market share, followed by Wells Fargo Bank, N.A. with 5% of the market, and PennyMac Loan Services, LLC with nearly 4% of the market.

Finally, in 2022, there were 306 HMDA reporters in the assessment area, who originated or purchased a total of 3,006 HMDA loans. JTNB was ranked seventh with 80 loans or nearly 3% of the HMDA market. Once again, Rocket Mortgage led the market with 6% of the market share, followed by First Commonwealth Federal Credit Union with almost 4% of the market, and Mauch Chunk Trust Company with 3% of the market.

As indicated previously, JTNB does not report small business loans for the purpose of CRA due to its asset size, and therefore is not included in the ranking of small business lenders operating in the assessment area. Accordingly, aggregate small business lending is included below for performance context information only, instead of for direct comparison. This data is also reported on an annual basis.

In 2018, 58 small business reporters originated or purchased a total of 1,005 small business and small farm loans in the Carbon County, PA assessment area. Among these reporters, American Express N.B. ranked first with nearly 18% of the small business market, followed by Chase Bank, USA, N.A. (9%), and Wells Fargo Bank, N.A. (9%).

In 2019, 60 small business reporters originated or purchased a total of 1,193 small business and small farm loans in the assessment area. Once again, American Express N.B. led the market with almost 15% of the small business market, followed by JP Morgan Chase Bank, N.A. (13%), and Synchrony Bank (10%).

In 2020, 73 small business reporters originated or purchased a total of 1,172 small business and small farm loans in the assessment area. American Express N.B. ranked first again with almost 14% of the small business market, followed by Wells Fargo Bank, N.A. (9%), and Synchrony Bank (8%).

In 2021, 74 small business reporters originated or purchased a total of 1,335 small business and small farm loans in the assessment area. As in the previous years, American Express N.B. led the market with 15% of the small business market, followed by Synchrony Bank (9%), and KeyBank (8%).

Finally, in 2022, 69 small business reporters originated or purchased a total of 1,347 small business and small farm loans in the assessment area. Again, American Express N.B. ranked first with almost 22% of the small business market, followed by Synchrony Bank (11%), and JP Morgan Chase Bank, N.A. (10%).

ECONOMIC CHARACTERISTICS

The bank's Carbon County, PA assessment area consists of the entirety of Carbon County, and five census tracts in adjacent Schuylkill County. Although Carbon County is a part of the Allentown-Bethlehem-Easton, PA MSA, it is significantly more rural than the other three counties that make up the MSA.

According to the January 2024 Moody's Analytics Precis report, the Allentown-Bethlehem-Easton, PA MSA's economy is in mid-expansion mode, due to the low cost of living and strong growth in the labor force. The MSA's labor market has outpaced Pennsylvania, with healthcare, leisure and hospitality leading the way. This stands in contrast to manufacturing, which has struggled to maintain momentum and has contracted more deeply than in the state and nation. Unemployment in the MSA remains low amid strong growth in the labor market, and house prices have been rising ahead of the state and nation since mid-year.

Strengths of the MSA noted in the report include proximity to East Coast ports and densely populated metro divisions, and below-average costs of living and doing business. On the other hand, weaknesses include an aging population that outpaces prime-age workers, above-average employment volatility relative to the nation, and below-average educational attainment.

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

According to the Pennsylvania Department of Labor and Industry, top industries include healthcare and social assistance at 20%, retail trade (13%), accommodation and food services (nearly 12%), and manufacturing (7%). Top employers in Carbon County include Saint Luke's Hospital, Blue Mountain Resort, VR US Holdings Inc., and Wal-Mart Associates, Inc.

During the evaluation period, seasonally unadjusted unemployment rates for Carbon and Schuylkill Counties, as presented in the following table, have remained higher than the MSA, Commonwealth, and nation as a whole. During the COVID-19 pandemic, unemployment rates increased substantially in 2020. However, the pandemic's impact on unemployment was short-lived, as evident by the decrease in unemployment in 2021 and 2022, though the MSA's unemployment rate was still slightly higher than the state and national levels. Area seasonally unadjusted unemployment rates

for the years, 2018, 2019, 2020, 2021, and 2022, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table.

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)					
Location	% 2018	% 2019	% 2020	% 2021	% 2022
Carbon County, PA	5.2%	5.3%	9.5%	6.2%	4.7%
Schuylkill County, PA	5.3%	5.4%	9.0%	6.3%	4.6%
Allentown-Bethlehem-Easton PA MSA	4.6%	4.4%	9.0%	6.0%	4.0%
Pennsylvania	4.4%	4.3%	8.9%	5.9%	4.1%
United States	3.9%	3.7%	8.1%	5.3%	3.6%

Unemployment data is from the Bureau of Labor Statistics.

HOUSING

2015 ACS Data

According to 2015 ACS data, the assessment area contained 42,740 housing units, almost 59% (25,075) of which were owner-occupied, 18% (7,776) of which were rentals, and 23% (9,889) of which were vacant. The overall owner-occupancy rate in the assessment area (59%) was lower than 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 the tracts. According to the 2015 ACS data, of the 25,075 owner-occupied housing units in the assessment area, 4% were located in the assessment area's single low-income census tract, while 29% were located in moderate-income tracts, 59% were located in middle-income tracts, and 8% located in upper-income census tracts.

Of the total existing housing units, 86% were single family units, 6% were two-to-four family units, almost 5% were multifamily units, and 3% were mobile homes. The median age of housing stock in the assessment area was 60 years, making it older than the housing stock in the Commonwealth of Pennsylvania, at 54 years.

Data from the 2015 ACS shows that the price of housing in the assessment area was more affordable than in the Commonwealth overall. The median housing value in the assessment area was $127,666, which was lower than the state median housing value of $166,000. Additionally, the median housing value was $47,473 in the assessment area's single low- income tract, $104,571 in moderate-income tracts, $151,717 in middle-income tracts, and $132,392 in upper-income tracts.

Finally, median gross rent (plus utilities) in the assessment area was notably lower than in Pennsylvania overall. Median gross rent for the assessment area was reported at $726, compared to statewide gross rent of $840 per month. Within the assessment area, 44% of renters spent more than 30% of their income on rent, which was slightly below the same measure statewide (46%).

2020 Census Data

According to the 2020 Census data the assessment area contained 43,222 housing units, almost 58% (25,055) of which were owner-occupied, 20% of which were rentals, and nearly 22% of which were vacant. The assessment area's overall owner-occupancy rate of 58% was lower than the Commonwealth of Pennsylvania's owner-occupied rate of 62%.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such tracts. According to the 2020 Census data, of the 25,055 owner-occupied housing units in the assessment area, 4% were located in the assessment area's single low-income census tract, while 34% were located in moderate-income tracts, and 62% were located in middle-income tracts. The assessment area contained no upper-income tracts according to the 2020 Census data.

Of the total existing housing units, 85% were single family units, 6% were two-to-four family units, 6% were multifamily units, and 3% were mobile homes. The median age of housing stock in the assessment area was 61 years, making it older than the housing stock in the Commonwealth of Pennsylvania, at 57 years.

Data from the 2020 Census data shows that the price of housing in the assessment area was more affordable than in the Commonwealth overall. The median housing value in the assessment area was $134,403, which was significantly lower than the state median housing value of $187,500. Additionally, the median housing value was $44,365 in the assessment area's single low- income tract, $123,357 in moderate-income tracts, and $147,232 in middle-income tracts. The assessment area contained no upper-income tracts.

Finally, median gross rent (plus utilities) in the assessment area was notably lower than in Pennsylvania overall. Median gross rent for the assessment area was reported at $816, compared to statewide gross rent of $958 per month. Within the assessment area, 39% of renters spent more than 30% of their income on rent, which was slightly below the same measure statewide (43%).

BORROWER INCOME DATA

2015 ACS Data

The percentage 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 21,825 families in the assessment area. Of the total families in the assessment area, almost 25% were designated as low-income families, 23% were moderate-income, 22% were middle-income, and 30% were upper-income families. According to the 2015 ACS data, 8% of the families in the assessment area were living below the poverty level, which was slightly below the same measure in the Commonwealth of Pennsylvania (9%).

2020 Census Data

The 2020 Census shows that there were 21,247 families in the assessment area. Of the total families in the assessment area, 25% were designated as low-income, 20% were moderate-income, 23% were middle-income, and 32% were upper-income. According to 2020 Census data, 8% of the families in the Carbon County, PA assessment area were living below the poverty level, which was in-line with the same measure in the Commonwealth of Pennsylvania (8%).

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 Allentown-Bethlehem-Easton, PA MSA 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 - $107,279	$107,280 or more
2022	$94,300	Less than $47,150	$47,150 - $75,439	$75,440 - $113,159	$113,160 or more

GEOGRAPHIC BUSINESS DATA

2015 ACS Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to 2018 Dun & Bradstreet data, there were 1,586 businesses located in the bank's Carbon County, PA assessment area. Of these businesses, 5% were located in the single low-income census tract, 25% were in moderate-income tracts, 58% were in middle-income tracts, and 12% were in upper-income tracts. Business demographic data also revealed that of the 1,586 businesses located in the assessment area in 2018, 91% were small businesses with gross annual revenues of $1 million or less.

In 2019, the total number of businesses increased to 2,872. Of these businesses, 4% were located in the single low-income census tract, 26% were in moderate-income tracts, 63% were in middle-income tracts, and 7% were in the single upper-income tract. Businesses demographic data also revealed that of the 2,872 businesses located in the assessment area, 91% were small businesses with gross annual revenues of $1 million or less.

In 2020, 2,824 businesses operated in the assessment area. Similar to previous year, 4% of the businesses were located in the single low-income census tract, 26% were in moderate-income tracts, 63% were in middle-income tracts, and 7% were in the single upper-income tract. Of the 2,842

businesses in the assessment area, 91% were small businesses with gross annual revenues of $1 million or less.

In 2021, the total number of businesses decreased to 2,548. Of these businesses, 3% were located in the single low-income census tract, 26% were located in moderate-income tracts, 64% were located in middle-income tracts, and 7% were located in the single upper-income tract. Of the 2,548 businesses in the assessment area, 91% were small businesses with gross annual revenues of $1 million or less.

2020 Census Data

Finally, in 2022, a total of 2,558 businesses operated in the assessment area. Of these businesses, 3% were located in the single low-income census tract, 34% were located in moderate- income tracts, and 63% were located in middle-income tracts. There were no upper-income tracts according to the 2020 Census data. Of the 2,558 businesses in the assessment area, 91% were small businesses with gross annual revenues of $1 million or less.

The 2018, 2019, 2020, 2021, and 2022 assessment area demographics used to evaluate JTNB's CRA performance in the Carbon County, PA assessment area are detailed in the tables on the following pages.

Jim Thorpe Neighborhood Bank Carbon County, 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	1	5.9	898	4.1	175	19.5	5,396	24.7
Moderate-income	6	35.3	6,576	30.1	683	10.4	4,928	22.6
Middle-income	9	52.9	12,747	58.4	891	7	4,928	22.6
Upper-income	1	5.9	1,604	7.4	24	1.5	6,573	30.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**17**	**100.0**	**21,825**	**100.0**	**1,773**	**8.1**	**21,825**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,147	1,051	4.2	49	584	27.2	512	23.8
Moderate-income	14,457	7,245	28.9	50.1	3,336	23.1	3,876	26.8
Middle-income	23,549	14,868	59.3	63.1	3,607	15.3	5,074	21.5
Upper-income	2,587	1,911	7.6	73.9	249	9.6	427	16.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**42,740**	**25,075**	**100.0**	**58.7**	**7,776**	**18.2**	**9,889**	**23.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	76	4.8	72	5.0	2	1.9	2	5.1
Moderate-income	400	25.2	367	25.5	23	21.5	10	25.6
Middle-income	920	58	836	58.1	64	59.8	20	51.4
Upper-income	190	12	165	11.4	18	16.8	7	17.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**1,586**	**100.0**	**1,440**	**100.0**	**107**	**100.0**	**39**	**100.0**
	Percentage of Total Businesses:			**90.8**		**6.7**		**2.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	5	27.8	5	29.4	0	0	0	0
Middle-income	6	33.3	6	35.3	0	0	0	0
Upper-income	7	38.9	6	35.3	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**18**	**100.0**	**17**	**100.0**	**1**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**94.4**		**5.6**		**.0**

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

Jim Thorpe Neighborhood Bank Carbon County, 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	1	5.9	898	4.1	175	19.5	5,396	24.7
Moderate-income	6	35.3	6,576	30.1	683	10.4	4,928	22.6
Middle-income	9	52.9	12,747	58.4	891	7	4,928	22.6
Upper-income	1	5.9	1,604	7.4	24	1.5	6,573	30.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**17**	**100.0**	**21,825**	**100.0**	**1,773**	**8.1**	**21,825**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,147	1,051	4.2	49	584	27.2	512	23.8
Moderate-income	14,457	7,245	28.9	50.1	3,336	23.1	3,876	26.8
Middle-income	23,549	14,868	59.3	63.1	3,607	15.3	5,074	21.5
Upper-income	2,587	1,911	7.6	73.9	249	9.6	427	16.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**42,740**	**25,075**	**100.0**	**58.7**	**7,776**	**18.2**	**9,889**	**23.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	104	3.6	96	3.7	4	2.1	4	5.6
Moderate-income	745	25.9	676	25.9	46	24.3	23	32.4
Middle-income	1,823	63.5	1,667	63.8	118	62.4	38	53.5
Upper-income	200	7.0	173	6.6	21	11.1	6	8.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**2,872**	**100.0**	**2,612**	**100.0**	**189**	**100.0**	**71**	**100.0**
	Percentage of Total Businesses:			**90.9**		**6.6**		**2.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	13	22.8	11	20.4	2	66.7	0	0
Middle-income	39	68.4	39	72.2	0	0	0	0
Upper-income	5	8.8	4	7.4	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**57**	**100.0**	**54**	**100.0**	**3**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**94.7**		**5.3**		**.0**

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

Jim Thorpe Neighborhood Bank Carbon County, 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	1	5.9	898	4.1	175	19.5	5,396	24.7
Moderate-income	6	35.3	6,576	30.1	683	10.4	4,928	22.6
Middle-income	9	52.9	12,747	58.4	891	7	4,928	22.6
Upper-income	1	5.9	1,604	7.4	24	1.5	6,573	30.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**17**	**100.0**	**21,825**	**100.0**	**1,773**	**8.1**	**21,825**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,147	1,051	4.2	49	584	27.2	512	23.8
Moderate-income	14,457	7,245	28.9	50.1	3,336	23.1	3,876	26.8
Middle-income	23,549	14,868	59.3	63.1	3,607	15.3	5,074	21.5
Upper-income	2,587	1,911	7.6	73.9	249	9.6	427	16.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**42,740**	**25,075**	**100.0**	**58.7**	**7,776**	**18.2**	**9,889**	**23.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	102	3.6	95	3.7	3	1.7	4	5.6
Moderate-income	739	26.2	678	26.3	39	22.3	22	30.6
Middle-income	1,788	63.3	1,638	63.6	110	62.9	40	55.6
Upper-income	195	6.9	166	6.4	23	13.1	6	8.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**2,824**	**100.0**	**2,577**	**100.0**	**175**	**100.0**	**72**	**100.0**
	Percentage of Total Businesses:			**91.3**		**6.2**		**2.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	15	26.3	13	24.1	2	66.7	0	0
Middle-income	37	64.9	37	68.5	0	0	0	0
Upper-income	5	8.8	4	7.4	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**57**	**100.0**	**54**	**100.0**	**3**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**94.7**		**5.3**		**.0**

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

Jim Thorpe Neighborhood Bank Carbon County, 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	1	5.9	898	4.1	175	19.5	5,396	24.7
Moderate-income	6	35.3	6,576	30.1	683	10.4	4,928	22.6
Middle-income	9	52.9	12,747	58.4	891	7	4,928	22.6
Upper-income	1	5.9	1,604	7.4	24	1.5	6,573	30.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**17**	**100.0**	**21,825**	**100.0**	**1,773**	**8.1**	**21,825**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,147	1,051	4.2	49	584	27.2	512	23.8
Moderate-income	14,457	7,245	28.9	50.1	3,336	23.1	3,876	26.8
Middle-income	23,549	14,868	59.3	63.1	3,607	15.3	5,074	21.5
Upper-income	2,587	1,911	7.6	73.9	249	9.6	427	16.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**42,740**	**25,075**	**100.0**	**58.7**	**7,776**	**18.2**	**9,889**	**23.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	81	3.2	76	3.3	3	1.8	2	2.9
Moderate-income	662	26	606	26.2	35	21.2	21	30.9
Middle-income	1,618	63.5	1,473	63.6	106	64.2	39	57.4
Upper-income	187	7.3	160	6.9	21	12.8	6	8.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**2,548**	**100.0**	**2,315**	**100.0**	**165**	**100.0**	**68**	**100.0**
	Percentage of Total Businesses:			**90.9**		**6.5**		**2.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	15	30.6	12	26.7	3	75	0	0
Middle-income	29	59.2	29	64.4	0	0	0	0
Upper-income	5	10.2	4	8.9	1	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**49**	**100.0**	**45**	**100.0**	**4**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**91.8**		**8.2**		**.0**

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

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.5	872	4.1	176	20.2	5,352	25.2
Moderate-income	8	36.4	7,356	34.6	691	9.4	4,281	20.1
Middle-income	13	59.1	13,019	61.3	904	6.9	4,764	22.4
Upper-income	0	0	0	0	0	0	6,850	32.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**22**	**100.0**	**21,247**	**100.0**	**1,771**	**8.3**	**21,247**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,025	896	3.6	44.2	676	33.4	453	22.4
Moderate-income	13,902	8,567	34.2	61.6	3,213	23.1	2,122	15.3
Middle-income	27,295	15,592	62.2	57.1	4,906	18	6,797	24.9
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**43,222**	**25,055**	**100.0**	**58.0**	**8,795**	**20.3**	**9,372**	**21.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	77	3.0	73	3.1	2	1.2	2	2.8
Moderate-income	868	33.9	793	34.2	48	29.1	27	37.5
Middle-income	1,613	63.1	1,455	62.7	115	69.7	43	59.7
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**2,558**	**100.0**	**2,321**	**100.0**	**165**	**100.0**	**72**	**100.0**
	Percentage of Total Businesses:			**90.7**		**6.5**		**2.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	16	32.7	14	30.4	2	66.7	0	0
Middle-income	33	67.3	32	69.6	1	33.3	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**49**	**100.0**	**46**	**100.0**	**3**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**93.9**		**6.1**		**.0**

Information based on 2020 Census Data and 2022 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

JTNB's loan-to-deposit ratio is considered reasonable given the bank's asset size, financial condition and assessment area credit needs.

A financial institution's loan-to-deposit ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend, 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.

JTNB's net loan-to-deposit ratio has averaged 56% over the 25 consecutive quarters since the previous CRA evaluation. The bank's ratio was below the peer group's average loan-to-deposit ratio of 73%. JTNB's average loan-to-deposit ratio increased from the previous evaluation, when it was reported at 48%.

The table on the following page shows JTNB's quarterly loan-to-deposit ratios for the period since the last CRA evaluation[5].

[5]The current peer group for JTNB consists of all insured commercial banks having assets of between $300 million and $1 billion.

Jim Thorpe Neighborhood Bank Historical Loan-to-Deposit Ratios				
As of Date	Net Loans $ (000s)	Total Deposits $ (000s)	Jim Thorpe LTD Ratio	Peer LTD Ratio
09/30/2018	94,822	166,393	57.0	81.6
12/31/2018	91,891	167,463	54.9	81.2
03/31/2019	92,235	158,779	58.1	80.1
06/30/2019	91,829	161,220	57.0	80.5
09/30/2019	91,942	175,157	52.5	80.4
12/31/2019	94,593	171,629	55.1	79.8
03/31/2020	95,781	164,039	58.4	79.2
06/30/2020	100,955	172,451	58.6	77.4
09/30/2020	104,575	193,481	54.1	76.4
12/31/2020	103,422	192,133	53.8	71.8
03/31/2021	109,829	197,055	55.7	68.3
06/30/2021	121,739	196,949	61.8	66.8
09/30/2021	124,393	208,515	59.7	65.4
12/31/2021	123,737	218,391	56.7	64.8
03/31/2022	124,438	212,544	58.6	63.4
06/30/2022	125,368	217,827	57.6	65.0
09/30/2022	123,994	235,633	52.6	67.8
12/31/2022	122,641	225,057	54.5	70.2
03/31/2023	123,471	216,793	57.0	71.1
06/30/2023	122,347	211,254	57.9	72.7
09/30/2023	120,566	231,970	52.0	73.4
12/31/2023	120,562	230,157	52.4	73.6
03/31/2024	126,150	220,581	57.2	73.2
Quarterly Loan-to-Deposit Average Since Previous Evaluation			56.2	73.2

Source: The Uniform Bank Performance Report

In absolute terms, the bank's net loan volume increased 33% over the evaluation period, from nearly $95 million, as of September 30, 2018, to $126 million, as of March 31, 2024. Deposits have increased by 33%, from $166 million as of September 30, 2018, to $221 million as of March 31, 2024.

ASSESSMENT AREA CONCENTRATION

A majority of JTNB's loans and other lending-related activities are in the assessment area. 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 JTNB's HMDA loans, and the sample of small business loans.

During the evaluation period, JTNB made 79% of HMDA loans by number, and 62% of loans by dollar amount, in the bank's assessment area. This performance is lower than levels at the previous CRA evaluation, when almost 86% by number, and 72% by dollar volume were made within the bank's assessment area.

With respect to small business loans, 53% of the number of small business loans sampled were extended within the bank's assessment area, while nearly 38% of the dollar amount of small business

loans sampled were made in the bank's assessment area.[6] At the prior CRA evaluation, 76% of small business loans by number, and 70% by dollar amount, were made within the assessment area.

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

Jim Thorpe Neighborhood Bank Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	$ (000s)	%	#	%	$ (000s)	%
Home Improvement	73	96.1	$2,845	95.4	3	3.9	$137	4.6
Home Purchase - Conventional	132	64.1	$19,696	53.5	74	35.9	$17,091	46.5
Multi-Family Housing	0	0	0	0	9	100.0	$2,506	100.0
Other Purpose Closed-End	45	95.7	$2,325	96.7	2	4.3	$80	3.3
Refinancing	134	91.2	$11,356	84.4	13	8.8	$2,098	15.6
Total HMDA related	**384**	**79.2**	**$36,222**	**62.3**	**101**	**20.8**	**$21,912**	**37.7**
Total Small Business related	**66**	**52.8**	**$7,681**	**38.0**	**59**	**47.2**	**$12,505**	**62.0**
TOTAL LOANS	**450**	**73.8**	**$43,903**	**56.1**	**160**	**26.2**	**$34.418**	**43.9**

Note: Affiliate loans not included

BORROWER DISTRIBUTION OF LENDING[7]

Given the assessment area's demographic 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

JTNB's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is 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- moderate-income individuals and families within the assessment area.

[6] The analysis of small business lending is based on a statistical sample of commercial loans originated by the bank during the evaluation period, spanning from 2018 to 2022.

[7] The information used to evaluate lending activity by JTNB is detailed in the Loan Distribution Tables contained in the Appendices.

As noted previously, according to the 2015 ACS, 25% of the assessment area families were low-income families, 23% were moderate-income, 23% were middle-income, and 30% were upper-income families. The last table, used to evaluate 2022 lending, relies on updated 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families. According to the updated 2020 Census data, 25% of assessment area families were low-income families, 20% were moderate-income, 23% were middle-income, and 32% were upper-income families. Both the 2015 ACS data and the 2020 Census data revealed that more than 47% of families in the assessment area were designated as low- or moderate-income, indicating a need for home-mortgage credit among this segment of the population.

The tables below compare JTNB's home-mortgage lending to aggregate home-mortgage lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The tables rely on the 2015 ACS and 2020 Census data, along with updated HMDA data, following the requirements of Regulation C.

Jim Thorpe Neighborhood Bank
Carbon County, PA Assessment Area
Distribution of HMDA Loans by Borrower Income Level
2018 and 2019

Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison			
		2018		2019	
		% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending
Low	24.7	4.8	11.2	11.9	13.3
Moderate	22.6	22.9	23.0	18.6	22.4
Middle	22.6	31.3	23.6	28.8	22.6
Upper	30.1	30.1	26.1	32.2	24.7
Unknown	0.0	10.9	16.1	8.5	17.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank
Carbon County, PA Assessment Area
Distribution of HMDA Loans by Borrower Income Level
2020 and 2021

Income Level	% Families by Family Income (2015 ACS Data)	Aggregate Comparison			
		2020		2021	
		% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending
Low	24.7	8.3	10.2	10.3	10.9
Moderate	22.6	17.9	19.2	17.9	20.0
Middle	22.6	15.5	18.8	29.5	20.2
Upper	30.1	45.2	33.4	38.5	31.9
Unknown	0.0	13.1	18.4	3.8	17.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level 2022			
Income Level	% Families by Family Income (2020 Census Data)	Aggregate Comparison 2022	
		% Jim Thorpe Lending	% Aggregate Lending
Low	25.2	13.8	13.3
Moderate	20.1	21.3	22.7
Middle	22.4	27.5	19.8
Upper	32.3	22.5	28.9
Unknown	0.0	15.0	15.3
Total	**100.0**	**100.0**	**100.0**

Lending to Low-Income Borrowers

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

In assessing the level of the bank's lending among the low-income borrowers, the evaluation takes into consideration that the home-mortgage credit needs of low-income individuals and families can be a challenge to address through convention loan products. This presents a significant obstacle to homeownership. Additionally, as previously stated, nearly 44% of renters at the time of the 2015 ACS, and 39% of renters at the time of the 2020 Census, spent more than 30% of their income on rent, which makes it difficult to save the customary down payment and closing costs necessary to purchase a home.

2015 ACS Data

JTNB's HMDA lending in 2018 to low-income borrowers was poor. Of JTNBs 83 HMDA loans, less than 5% (four loans) were originated to low-income borrowers, compared to a proxy of 25%, and aggregate lending to low-income borrowers of 11%. By product type, JTNB made 6% of home purchase loans, 5% of refinance loans, 10% of other purpose closed/exempt loans, and no home improvement loans, multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to low-income borrowers in 2018. Comparatively, aggregate lenders made 11% of home purchase loans, 14% of refinance loans, 11% of home improvement loans, 8% of other purpose lines of credit, 18% of other purpose closed/exempt loans, 1% of loans with purpose "not applicable," and no multifamily loans to low-income borrowers.

JTNB's HMDA lending in 2019 to low-income borrowers was poor. Of JTNB's 59 HMDA loans, 12% (7 loans) were made to low-income borrowers, compared to a proxy of 25%, and aggregate lending to low-income borrowers of 13%. By product type, JTNB made 6% of home purchase loans, 17% of refinance loans, 9% of home improvement loans, 14% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to low-income borrowers. Comparatively, aggregate lenders made 14% of home purchase loans, 14% of refinance loans, 15% of home improvement loans, 9% of other purpose lines of credit, 16% of other purpose closed/exempt loans, and no multifamily loans or loans with purpose "not applicable" to low-income borrowers.

JTNB's HMDA lending in 2020 to low-income borrowers was poor. Of JTNB's 84 HMDA loans, 8% (7 loans) were made to low-income borrowers, compared to a proxy of 25%, and aggregate lending to low-income borrowers of 10%. By product type, JTNB made 7% of home purchase loans, 10% of refinance loans, 13% of home improvement loans, and no multifamily, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" to low-income borrowers. Comparatively, aggregate lenders made 13% of home purchase loans, 8% of refinance loans, 7% of home improvement loans, 19% of other purpose lines of credit, 7% of other purpose closed/exempt loans, and no multifamily loans or loans with purpose "not applicable" to low-income borrowers.

JTNB's HMDA lending in 2021 to low-income borrowers was poor. Of JTNB's 78 HMDA loans, 10% (8 loans) were made to low-income borrowers, compared to a proxy of 25%, and aggregate lending to low-income borrowers of 11%. By product type, JTNB made 11% of refinance loans, 36% of home improvement loans, and no home purchase loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" to low-income borrowers. Comparatively, aggregate lenders made 12% of home purchase loans, 9% of refinance loans, 18% of home improvement loans, 10% of other purpose lines of credit, 10% of other purpose closed/exempt loans, and no multifamily loans or loans with purpose "not applicable" to low-income borrowers.

2020 Census Data

JTNB's HMDA lending in 2022 to low-income borrowers was reasonable. Of JTNB's 80 HMDA loans, 14% (11 loans) were made to low-income borrowers, compared to a proxy of 25%, and aggregate lending to low-income borrowers of 13%. By product type, JTNB made 24% of home purchase loans, 8% of refinance loans, 18% of other purpose closed/exempt loans, and no home improvement loans, multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to low-income borrowers. Comparatively, aggregate lenders made 13% of home purchase loans, 14% of refinance loans, 14% of home improvement loans, 20% of other purpose lines of credit, 17% of other purpose closed/exempt loans, and no multifamily loans, or loans with purpose "not applicable" to low-income borrowers.

As previously mentioned, the lack of affordable quality housing, along with challenges for low- and moderate-income borrowers to save the customary down payment and closing costs necessary for home purchases, has impacted the demand for HMDA loan types. This helps to explain why both bank and aggregate lending data notably trailed behind the proxy for low-income families in the assessment area in all years evaluated.

Lending to Moderate-Income Borrowers

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

2015 ACS Data

In 2018, JTNB's lending to moderate-income borrowers was reasonable. In 2018, 23% of the bank's HMDA loans (19 loans) were originated to moderate-income borrowers, which was the same as the aggregate performance (23%), and the proxy of families by family income (23%). By product type, JTNB made 29% of home purchase loans, 16% of refinance loans, 25% of home improvement loans, 10% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit or loans with purpose "not applicable" to moderate-income borrowers. Comparatively, aggregate lenders made 24% of home purchase loans, 23% of refinance loans, 30% of home improvement loans, 24% of other purpose lines of credit, 17% of other purpose closed/exempt loans, 1% of loans with purpose "not applicable," and no multifamily loans to moderate-income borrowers in 2018.

In 2019, the bank's lending to moderate-income borrowers was reasonable. In 2019, almost 19% of the bank's HMDA loans (11 loans) were originated to moderate-income borrowers, which fell below the aggregate performance (22%), and the proxy (23%). By product type, JTNB made 29% of home purchase loans, 13% of refinance loans, 9% of home improvement loans, 29% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to moderate-income borrowers. Comparatively, aggregate lenders made 26% of home purchase loans, 20% of refinance loans, 19% of home improvement loans, 9% of multifamily loans, 23% of other purpose lines of credit, 24% of other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2019.

In 2020, the bank's lending to moderate-income borrowers was reasonable. In 2020, almost 18% of the bank's HMDA loans (15 loans) were originated to moderate-income borrowers, which fell slightly below the aggregate performance (19%), and below the proxy (23%). By product type, JTNB made 7% of home purchase loans, 13% of refinance loans, 31% of home improvement loans, 44% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to moderate-income borrowers. Comparatively, aggregate lenders made 24% of home purchase loans, 15% of refinance loan, 23% of home improvement loans, 19% of other purpose lines of credit, 25% of other purpose closed/exempt loans, less than 1% of loans with purpose "not applicable," and no multifamily loans to moderate-income borrowers in 2020.

In 2021, the bank's lending to moderate-income borrowers was reasonable. In 2021, 18% of the bank's HMDA loans (14 loans) were originated to moderate-income borrowers, which fell below both the aggregate performance (20%), and the proxy (23%). By product type, JTNB made 13% of home purchase loans, 29% of refinance loans, 13% of other purchase closed/exempt loans, and no home improvement loans, multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to moderate-income borrowers in 2021. Comparatively, aggregate lenders made 22% of home purchase loans, 19% of refinance loans, 14% of home improvement loans, 29% of other purpose lines of credit, 23% of other purpose closed/exempt loans, and no multifamily loans or loans with purpose "not applicable" to moderate-income borrowers in 2021.

2020 Census Data

Finally, in 2022, the bank's lending to moderate-income borrowers was reasonable. In 2022, 21% of the bank's HMDA loans (17 loans) were originated to moderate-income borrowers, which fell below the aggregate performance (23%), but slightly above the proxy (20%). By product type, JTNB made 17% of home purchase loans, 24% of refinance loans, 20% of home improvement loans, 27% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" to moderate-income borrowers. Comparatively, aggregate lenders made 22% of home purchase loans, 25% of refinance loans, 25% of home improvement loans, 21% of other purpose lines of credit, 21% of other purpose closed/exempt loans, and no multifamily or loans with purpose "not applicable" to moderate-income borrowers in 2022.

Small Business Lending

An analysis of JTNB'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 analyzed to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to available Dun & Bradstreet business data in 2018, there were 1,586 businesses operating in the assessment area, with 1,440 (91%) designated as small businesses. In 2019, 2,872 businesses operated in the assessment area, with 2,612 (91%) designated as small businesses. In 2020, 2,824 businesses operated in the assessment area, with 2,577 (91%) designated as small businesses. In 2021, 2,548 businesses operated in the assessment area, with 2,315 (91%) designated as small businesses. Finally, in 2022, Dun & Bradstreet data indicate that there 2,558 businesses operating in the assessment area, 2,321 (91%) of which were small businesses.

As previously mentioned, JTNB is not a CRA small business reporter, and as such, a sample of 66 of the bank's small business loans from the period spanning 2018 through 2022 was used to evaluate small business lending performance.

Further, according to information provided by the bank, JTNB originated 247 Small Business Administration's (SBA) Paycheck Protection Program (PPP)[8] loans in 2020 and 2021, and participation in this program may have obscured the bank's small business borrower distribution performance, particularly in 2020 and 2021. Under this program, institutions were not required to collect revenue information. More specifically, of the small business loans sampled in 2020, 69% had unknown revenues. This contextual information was considered when determining the borrower distribution conclusions noted below.

[8] In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security (CARES) Act, and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provided small businesses with funds to pay up to eight weeks of payroll costs, including benefits. Fund could also be used to pay interest on mortgages, rent, and utilities.

2015 ACS Data

In 2018, JTNB borrower distribution of small business loans was reasonable. Of the 18 small business loans made by the bank in 2018, 72% were originated to small businesses with gross annual revenues of $1 million or less. This is significantly higher than the performance of aggregate lenders, who originated 43% of loans to small businesses, but falls below the proxy 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 the credit needs of small businesses. In 2018, 67% of small business loans were extended in amounts of $100 thousand or less, compared with 95% of loans made by aggregate lenders.

In 2019, the bank's borrower distribution of small business loans was reasonable. Of the 10 small business loans made in the assessment area in 2019, 80% were originated to small businesses with gross annual revenues of $1 million or less. This is significantly higher than the performance of aggregate lenders, who originated 43% of loans to small businesses, but falls below the proxy of small businesses in the assessment area (91%). In 2019, 60% of small business loans were extended in amounts of $100 thousand or less, compared to 95% of loans made by aggregate lenders.

In 2020, the bank's borrower distribution of small business loans was reasonable. Of the 13 small business loans made in the assessment area in 2020, 31% were originated to small businesses with gross annual revenues of $1 million or less. Notably, 69% of the bank's small business loan originations were to businesses with unknown revenue. This is attributable to the bank's participation in the SBA PPP, where institutions were not required to collect revenue information. The COVID-19 pandemic was an unprecedented global event that impacted businesses of all sizes, most notably smaller businesses that typically do not have an excess of capital to weather long periods of closure and slashed revenues.

When only considering the bank's loans where revenues were reported as $1 million or less, performance was comparable to the aggregate lenders, who originated 37% of loans to small businesses, but falls below the proxy of small businesses in the assessment area (91%). In 2020, 92% of small business loans were extended in amounts of $100 thousand or less, compared to 90% of loans made by aggregate lenders.

In 2021, the bank's borrower distribution of small business loans was excellent. Of the 13 small business loans made in the assessment area in 2021, 92% were originated to small businesses with gross annual revenues of $1 million or less. This is significantly higher than the performance of aggregate lenders, who originated 46% of loans to small businesses, and comparable to the proxy of small businesses in the assessment area (91%). In 2021, 85% of small business loans were extended in amounts of $100 thousand or less, compared to 93% of loans made by aggregate lenders.

2020 Census Data

Finally, in 2022, the bank's borrower distribution of small business loans was excellent. Of the 12 small business loans made in the assessment area in 2022, 92% were originated to small businesses with gross annual revenues of $1 million or less. This is significantly higher than the performance of aggregate lenders, who originated 53% of loans to small businesses, and comparable to the proxy of small businesses in the assessment area (91%). In 2022, 58% of small business loans were extended in amounts of $100 thousand or less, compared to 95% 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 reasonable dispersion throughout the Carbon County, PA assessment area. As in the borrower distribution, HMDA loans were given greater weight than small business loans in determining this conclusion, because of relative lending volumes.

Home-Mortgage Lending

JTNB's geographic distribution of home mortgages reflects reasonable dispersion throughout the assessment area, taking into consideration the bank's business strategy and the assessment area's demographics and economic characteristics. As noted earlier, the percentage of owner-occupied housing units contained within 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 in the tract.

According to the 2015 ACS data, which was used as a proxy for lending in 2018, 2019, 2020, and 2021, 4% of owner-occupied housing was located in the assessment area's single low-income census tract, 29% in the six moderate-income census tracts, 59% in the nine middle-income census tracts, and 8% in the single upper-income census tract. According to the updated 2020 Census data, which was used as a proxy for lending in 2022, 4% of owner-occupied housing was located in the assessment area's single low-income census tract, and 34% in the eight moderate-income tracts. The remaining owner-occupied units (62%) were located in the 13 middle-income census tracts. There were no upper-income census tracts as of the 2020 Census.

The following tables present JTNB's geographic distribution of HMDA loans from 2018 through 2022, in comparison to the applicable owner-occupied housing proxy, and the aggregate lending levels in the assessment area for the evaluation period. The first and second tables rely on 2015 ACS data. The third table relies on 2020 Census data. All tables contain updated HMDA data, following the requirements of Regulation C.

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of HMDA Loans 2018 and 2019					
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison			
		2018		2019	
		% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending
Low	4.2	6.0	1.7	3.4	1.5
Moderate	28.9	16.9	32.6	15.3	31.5
Middle	59.3	74.7	60.5	78.0	61.0
Upper	7.6	2.4	5.2	3.3	6.0
Unknown	0.0	0.0	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of HMDA Loans 2020 and 2021					
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	Aggregate Comparison			
		2020		2021	
		% Jim Thorpe Lending	% Aggregate Lending	% Jim Thorpe Lending	% Aggregate Lending
Low	4.2	3.6	1.1	7.7	1.6
Moderate	28.9	13.1	32.8	26.9	33.0
Middle	59.3	81.0	60.3	65.4	60.0
Upper	7.6	2.3	5.8	0.0	5.4
Unknown	0.0	0.0	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of HMDA Loans 2022			
Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2022	
		% Jim Thorpe Lending	% Aggregate Lending
Low	3.6	6.3	2.9
Moderate	34.2	47.5	31.1
Middle	62.2	46.2	66.0
Upper	0.0	0.0	0.0
Unknown	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

JTNB's overall HMDA lending in the assessment area's single low-income census tract was considered excellent. While lending opportunities were limited as there was only one low-income tract containing 4% of owner-occupied unit reported using 2015 ACS data and 2020 Census data, the bank's lending outperformed both proxy and aggregated lenders in 2018, 2021, and 2022. JTNB outperformed aggregated lenders in 2019 and 2020.

2015 ACS Data

JTNB's geographic distribution of HMDA lending in the single low-income census tract in 2018 was excellent. In 2018, the bank made 6% of HMDA loans (five loans) in the bank's single low-income tract, which was above the performance of aggregate lenders (almost 2%), and the proxy of owner-occupied housing in the low-income tract (4%). By product type, the bank made 6% of home purchase loans, 16% of refinance loans, and no home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in the low-income census tract. By comparison, aggregate lenders made less than 1% of home purchase loans, nearly 2% of refinance loans, 5% of home improvement loans, nearly 2% of other purpose lines of credit, 3% of other purpose closed/exempt loans, 8% of loans with purpose "not applicable," and no multifamily loans in the low-income tract in 2018.

JTNB's geographic distribution of HMDA loans in the bank's single low-income census tract in 2019 was reasonable. JTNB made 3% of HMDA loans (two loans) in the low-income census tract, which was slightly above the aggregate lenders (nearly 2%), and slightly below the proxy of owner-occupied housing in the low-income tract (4%). By product type, the bank made 6% of home purchase loans, 4% of refinance loans, and no home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in the low-income census tract. By comparison, aggregate lenders made 1% of home purchase loans, less than 1% of refinance loans, nearly 2% of home improvement loans, 18% of multifamily loans, 2% of other purpose lines of credit, 1% of other purpose closed/exempt loans, and 7% of loans with purpose "not applicable" in the low-income tract in 2019.

In 2020, JTNB's geographic distribution of HMDA loans in the low-income tract within the assessment was excellent. The bank made nearly 4% of HMDA loans (three loans) in the single low-income tract, which was above that of aggregate lenders (1%), and equal to the proxy of owner-occupied housing in the low-income tract (4%). By product type, JTNB made nearly 4% of home purchase loans, nearly 7% of refinance loans, and no home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" in the low-income census tract. By comparison, aggregate lenders made 1% of home purchase loans, less than 1% of refinance loans, nearly 2% of home improvement loans, 7% of multifamily loans, 2% of other purpose lines of credit, 3% of other purpose closed/exempt loans, and nearly 3% of loans with purpose "not applicable" in the low-income tract in 2020.

In 2021, JTNB's geographic distribution of HMDA loans in the low-income tract within the assessment was excellent. The bank made nearly 8% of HMDA loans (six loans) in the single low-income tract, which was above that of aggregate lenders (nearly 2%), and the proxy of owner-occupied housing in the low-income tract (4%). By product type, JTNB made 8% of the bank's home purchase loans, 9% of refinance loans, 9% of home improvement loans, and no multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of "not applicable" in the single low-income tract. By comparison, aggregate lenders made 2% of home purchase loans, less than 1% of refinance loans, nearly 4% of home improvement loans, nearly 7% of multifamily loans, 1% of other purpose lines of credit, nearly 10% of loans with purpose "not applicable," and no other purpose closed/exempt loans in the low-income tract in 2021.

2020 Census Data

In 2022, JTNB's geographic distribution of HMDA loans in the low-income tract within Carbon County, PA assessment was excellent. JTNB made 6% of HMDA loans (five loans) in the single low-income tract, which was above that of aggregate lenders (nearly 3%), and the proxy of owner-occupied housing in the low-income tract (almost 4%). By product type, nearly 14% of the bank's home purchase loans, 4% of refinance loans, and no home improvement loans, multifamily loans, other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose of "not applicable" were made in the single low-income tract. By comparison, aggregate lenders made 3% of home purchase loans, 2% of refinance loans, nearly 4% of home improvement loans, 16% of multifamily loans, 2% of other purpose lines of credit, 2% of other purpose closed/exempt loans, and nearly 6% of loans with purpose "not applicable" in the low-income tract in 2022.

Lending in Moderate-Income Census Tracts

JTNB's overall HMDA lending in the assessment area's moderate-income census tract was reasonable. This rating takes into consideration of changes in census tract designations from 2015 ACS data to 2020 Census data, where the assessment area went from six moderate-income census tracts to eight moderate-income tracts. Furthermore, because of the census tract changes, JTNB went from having one branch in a moderate-income tract to having three branches located in moderate-income tracts.

2015 ACS Data

JTNB's geographic distribution of HMDA loans in moderate-income tracts in 2018 was poor. The bank made nearly 17% of HMDA loans (14 loans) in moderate-income tracts, which was below the performance of aggregate lenders (nearly 33%), and the proxy of owner-occupied housing in moderate-income tracts (30%). By product type, the bank made nearly 21% of home purchase loans, nearly 11% of refinance loans, 15% of home improvement loans, 20% of other purpose closed/exempt loans, and no multifamily loans, other purpose lines of credit, and loans with purpose "not applicable" in moderate-income census tracts in 2018. By comparison, aggregate lenders made nearly 37% of home purchase loans, nearly 27% of refinance loans, nearly 27% of home improvement loans, 20% of multifamily loans, 37% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and 32% of loans with purpose "not applicable" in moderate-income tracts in 2018.

JTNB's geographic distribution of HMDA loans in moderate-income tracts in 2019 was poor. The bank made 15% of HMDA loans (nine loans) in moderate-income tracts, which was below the performance of aggregate lenders (nearly 32%), and the proxy of owner-occupied housing in moderate-income tracts (30%). By product type, the bank made nearly 12% of home purchase loans, 25% of refinance loans, 14% of other purpose closed/exempt loans, and no home improvement loans, multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" in moderate-income census tracts in 2019. By comparison, aggregate lenders made nearly 34% of home purchase loans, 27% of refinance loans, 25% of home improvement loans, 36% of multifamily loans, 34% of other purpose lines of credit, 26% of other purpose closed/exempt loans, and 41% of loans with purpose "not applicable" in moderate-income tracts in 2019.

In 2020, JTNB's geographic distribution of HMDA loans in moderate-income tracts was poor. JTNB made 13% of HMDA loans (11 loans) in moderate-income tracts, which was below the performance of aggregate lenders (nearly 33%), and the proxy of owner-occupied housing in moderate-income tracts (30%). By product type, the bank made 18% of home purchase loans, 3% of refinance loans, nearly 13% of home improvement loans, 33% of closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose "not applicable" in moderate-income census tracts in 2020. By comparison, aggregate lenders made 39% of home purchase loans, 26% of refinance loans, 24% of home improvement loans, 50% of multifamily loans, 25% of other purpose lines of credit, 21% of other purpose closed/exempt loans, and 41% of loans with purpose "not applicable" in moderate-income tracts in 2020.

In 2021, JTNB's geographic distribution of HMDA loans in moderate-income tract was reasonable. JTNB made 27% of HMDA loans (21 loans) in moderate-income tracts, which was below the performance of aggregate lenders (33%), and the proxy of owner-occupied housing in moderate-income tracts (30%). By product type, the bank made 38% of home purchase loans, 23% of refinance loans, 27% of home improvement loans, 13% of closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose of "not applicable" in moderate-income census tracts in 2021. By comparison, aggregate lenders made 39% of home purchase loans, 28% of refinance loans, 31% of home improvement loans, 40% of multifamily loans, 21% of other purpose lines of credit, 23% of other purpose closed/exempt loans, and 46% of loans with purpose "not applicable" in moderate-income tracts in 2021.

2020 Census Data

In 2022, JTNB's geographic distribution of HMDA loans in moderate-income tract was excellent. JTNB made nearly 48% of HMDA loans (38 loans) in moderate-income tracts, which was above the performance of aggregate lenders (31%), and the proxy of owner-occupied housing in moderate-income tracts (34%). By product type, the bank made 35% of home purchase loans, 68% of refinance loans, 47% of home improvement loans, 36% of closed/exempt loans, and no multifamily loans, other purpose lines of credit, or loans with purpose of "not applicable" in moderate-income census tracts in 2022. By comparison, aggregate lenders made 31% of home purchase loans, 31% of refinance loans, 36% of home improvement loans, 32% of multifamily loans, 23% of other purpose lines of credit, 31% of other purpose closed/exempt loans, and 29% of loans with purpose "not applicable" in moderate-income tracts in 2022.

Small Business Lending

The geographic distribution of JTNB's small business loans reflects reasonable dispersion throughout the assessment area, in the context of the assessment area's demographic and economic characteristics, during the evaluation period. As indicated previously, because the bank is not a small bank reporter, conclusions are based on a sample 66 small business loans made in 2018, 2019, 2020, 2021, and 2022.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a

tract, the greater the demand for small business loans in the tract. Based on 2018 Dun & Bradstreet data, nearly 5% of businesses were located in the low-income tract, 25% were located in moderate-income tracts, 58% were located in middle-income tracts, and nearly 12% in upper-income tracts. Based on 2019 Dun & Bradstreet data, nearly 4% of businesses were located in the low-income tract, nearly 26% were located in moderate-income tracts, nearly 63% were located in middle-income tracts, and 7% in upper-income tracts. The geographic distribution of businesses changed very little from 2019 to 2020. According to 2021 Dun & Bradstreet data, 3% of businesses were located in the low-income tract, 26% in moderate-income tracts, 64% in middle-income tracts, and 7% in upper-income tracts. Based on the 2022 Dun & Bradstreet data, 3% of businesses were located in the low-income tract, 34% were located in moderate-income tracts, and 63% were located in the middle-income tracts. There were no upper-income tracts reported using the 2020 Census data.

The following tables present JTNB's small business geographic distribution in comparison to the business proxy and aggregate lending for the years evaluated.

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of Small Business Loans 2018			
Census Tract Income Level	% Businesses by Tract Income Level (2018 D&B Data)	Aggregate Comparison 2018	
		% Jim Thorpe Lending	% Aggregate Lending
Low	4.8	5.6	1.5
Moderate	25.2	22.2	32.0
Middle	58.0	72.2	56.2
Upper	12.0	0.0	8.3
Unknown	0.0	0.0	2.0
Total	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of Small Business Loans 2019			
Census Tract Income Level	% Businesses by Tract Income Level (2019 D&B Data)	Aggregate Comparison 2019	
		% Jim Thorpe Lending	% Aggregate Lending
Low	3.6	0.0	2.4
Moderate	25.9	20.0	30.4
Middle	63.5	80.0	55.5
Upper	7.0	0.0	8.5
Unknown	0.0	0.0	3.2
Total	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of Small Business Loans 2020			
Census Tract Income Level	% Businesses by Tract Income Level (2020 D&B Data)	Aggregate Comparison 2020	
		% Jim Thorpe Lending	% Aggregate Lending
Low	3.6	0.0	1.9
Moderate	26.2	0.0	27.3
Middle	63.3	100.0	60.9
Upper	6.9	0.0	9.4
Unknown	0.0	0.0	0.5
Total	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of Small Business Loans 2021			
Census Tract Income Level	% Businesses by Tract Income Level (2021 D&B Data)	Aggregate Comparison 2021	
		% Jim Thorpe Lending	% Aggregate Lending
Low	3.2	0.0	1.9
Moderate	26.0	0.0	31.5
Middle	63.5	100.0	58.7
Upper	7.3	0.0	7.2
Unknown	0.0	0.0	0.7
Total	**100.0**	**100.0**	**100.0**

Jim Thorpe Neighborhood Bank Carbon County, PA Assessment Area Geographic Distribution of Small Business Loans 2022			
Census Tract Income Level	% Businesses by Tract Income Level (2022 D&B Data)	Aggregate Comparison 2022	
		% Jim Thorpe Lending	% Aggregate Lending
Low	3.0	0.0	1.9
Moderate	33.9	50.0	34.7
Middle	63.1	50.0	62.4
Upper	0.0	0.0	0.0
Unknown	0.0	0.0	1.0
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

Overall, JTNB's small business lending in the single low-income census tract was very poor. It is noted that lending opportunities were limited and there is only one low-income census using 2015 ACS data and 2020 Census data.

2015 ACS Data

JTNB's 2018 small business lending in the low-income tract was reasonable. Of the 2018 loan sample, the bank made one small business loan (nearly 6%) in the single low-income tract. This performance was above aggregate lending in the low-income tract (nearly 2%), and the proxy of businesses located in low-income tract (5%).

JTNB's 2019 small business lending in the low-income tract was very poor. Of the 2019 loan sample, the bank made no loans in the single low-income tract within the assessment area. This falls below the aggregate lending in the low-income tract (2%), and the proxy of businesses located in low-income tract (nearly 4%).

JTNB's 2020 small business lending in the low-income tract was very poor. Of the 2020 loan sample, the bank made no loans in the single low-income tract within the assessment area. This falls below the aggregate lending in the low-income tract (2%), and the proxy of businesses located in low-income tract (nearly 4%).

JTNB's 2021 small business lending in the low-income tract was very poor. Of the 2021 loan sample, the bank made no loans in the single low-income tract within the assessment area. This falls below the aggregate lending in the low-income tract (2%), and the proxy of businesses located in low-income tract (3%).

2020 Census Data

JTNB's 2022 small business lending in the low-income tract was very poor. Of the 2022 loan sample, the bank made no loans in the single low-income tract within the assessment area. This falls below the aggregate lending in the low-income tract (2%), and the proxy of businesses located in low-income tract (3%).

Lending in Moderate-Income Census Tracts

Overall, JTNB's small business lending in the moderate-income tracts was reasonable. It is noted that lending opportunities were limited in 2018 to 2021. In 2022, small business lending improved because of changes in census tract designations from 2015 ACS data to 2020 Census data. The assessment area went from six moderate-income census tracts to eight moderate-income tracts. Furthermore, because of the census tract changes, JTNB went from having one branch in a moderate-income tract to having three branches located in moderate-income tracts.

2015 ACS Data

JTNB's 2018 small business lending in the moderate-income tracts was reasonable. Of the 2018 sample, the bank made four loans (22%) in moderate-income tracts. This falls below the aggregate lending in the moderate-income tract (32%), and the proxy of businesses located in moderate-income tract (25%).

JTNB's 2019 small business lending in the moderate-income tracts was reasonable. Of the 2019 sample, the bank made two loans (20%) in moderate-income tracts. This falls below the aggregate lending in the moderate-income tract (30%), and the proxy of businesses located in moderate-income tract (26%).

JTNB's 2020 small business lending in the moderate-income tracts was very poor. Of the 2020 sample, the bank made no loans in moderate-income tracts. This performance falls significantly below both the aggregate lending in the moderate-income tract (27%), and the proxy of businesses located in moderate-income tract (26%).

JTNB's 2021 small business lending in the moderate-income tracts was very poor. Of the 2021 sample, the bank made no loans in moderate-income tracts. This performance falls significantly below both the aggregate lending in the moderate-income tract (32%), and the proxy of businesses located in moderate-income tract (26%).

2020 Census Data

Finally, in 2022, JTNB's small business lending in moderate-income tracts was excellent. Of the 2022 sample, the bank made six loans (50%) in moderate-income tracts, which exceeded aggregate lending performance (35%), and the proxy of businesses located in moderate-income tracts (34%).

RESPONSE TO SUBTANTIATED COMPLAINTS

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

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

JTNB 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; or
(4) Activities that revitalize or stabilize—
    (i) Low-or moderate-income geographies;
    (ii) Designated disaster areas; or
    (iii)Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on—
        A. Rates of poverty, unemployment, and population loss; or
        B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

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

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

2018 HMDA LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	2	5.9%	43	0.9%	2	5.9%	94	2.1%
Moderate	7	20.6%	689	15.1%	10	29.4%	818	17.9%
Middle	24	70.6%	3,646	79.6%	6	17.6%	494	10.8%
Upper	1	2.9%	200	4.4%	11	32.4%	2,535	55.4%
Unknown	0	0.0%	0	0.0%	5	14.7%	637	13.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**34**	**100.0%**	**4,577**	**100.0%**	**34**	**100.0%**	**4,577**	**100.0%**
Refinance								
Low	3	15.8%	140	11.2%	1	5.3%	49	3.9%
Moderate	2	10.5%	95	7.6%	3	15.8%	205	16.3%
Middle	13	68.4%	968	77.0%	9	47.4%	604	48.0%
Upper	1	5.3%	53	4.2%	3	15.8%	219	17.4%
Unknown	0	0.0%	0	0.0%	3	15.8%	180	14.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**19**	**100.0%**	**1,257**	**100.0%**	**19**	**100.0%**	**1,257**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	15.0%	150	19.1%	5	25.0%	116	14.8%
Middle	17	85.0%	636	80.9%	7	35.0%	280	35.6%
Upper	0	0.0%	0	0.0%	7	35.0%	310	39.4%
Unknown	0	0.0%	0	0.0%	1	5.0%	80	10.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**20**	**100.0%**	**786**	**100.0%**	**20**	**100.0%**	**786**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	10.0%	18	5.8%
Moderate	2	20.0%	57	18.2%	1	10.0%	30	9.6%
Middle	8	80.0%	256	81.8%	4	40.0%	118	37.7%
Upper	0	0.0%	0	0.0%	4	40.0%	147	46.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**313**	**100.0%**	**10**	**100.0%**	**313**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	5	6.0%	183	2.6%	4	4.8%	161	2.3%
Moderate	14	16.9%	992	14.3%	19	22.9%	1,169	16.9%
Middle	62	74.7%	5,506	79.4%	26	31.3%	1,496	21.6%
Upper	2	2.4%	253	3.6%	25	30.1%	3,210	46.3%
Unknown	0	0.0%	0	0.0%	9	10.8%	897	12.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**83**	**100.0%**	**6,933**	**100.0%**	**83**	**100.0%**	**6,933**	**100.0%**

2019 HMDA LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	5.9%	16	0.7%	1	5.9%	32	1.3%
Moderate	2	11.8%	141	5.8%	5	29.4%	294	12.0%
Middle	13	76.5%	2,132	87.3%	2	11.8%	248	10.2%
Upper	1	5.9%	154	6.3%	8	47.1%	1,440	58.9%
Unknown	0	0.0%	0	0.0%	1	5.9%	429	17.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**17**	**100.0%**	**2,443**	**100.0%**	**17**	**100.0%**	**2,443**	**100.0%**
Refinance								
Low	1	4.2%	10	0.6%	4	16.7%	58	3.4%
Moderate	6	25.0%	379	22.0%	3	12.5%	215	12.5%
Middle	16	66.7%	1,235	71.6%	9	37.5%	618	35.8%
Upper	1	4.2%	100	5.8%	5	20.8%	553	32.1%
Unknown	0	0.0%	0	0.0%	3	12.5%	280	16.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**24**	**100.0%**	**1,724**	**100.0%**	**24**	**100.0%**	**1,724**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	1	9.1%	20	5.6%
Moderate	0	0.0%	0	0.0%	1	9.1%	35	9.9%
Middle	11	100.0%	355	100.0%	5	45.5%	150	42.3%
Upper	0	0.0%	0	0.0%	3	27.3%	80	22.5%
Unknown	0	0.0%	0	0.0%	1	9.1%	70	19.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**11**	**100.0%**	**355**	**100.0%**	**11**	**100.0%**	**355**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	14.3%	20	7.6%
Moderate	1	14.3%	60	22.9%	2	28.6%	89	34.0%
Middle	6	85.7%	202	77.1%	1	14.3%	60	22.9%
Upper	0	0.0%	0	0.0%	3	42.9%	93	35.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**262**	**100.0%**	**7**	**100.0%**	**262**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	2	3.4%	26	0.5%	7	11.9%	130	2.7%
Moderate	9	15.3%	580	12.1%	11	18.6%	633	13.2%
Middle	46	78.0%	3,924	82.0%	17	28.8%	1,076	22.5%
Upper	2	3.4%	254	5.3%	19	32.2%	2,166	45.3%
Unknown	0	0.0%	0	0.0%	5	8.5%	779	16.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**59**	**100.0%**	**4,784**	**100.0%**	**59**	**100.0%**	**4,784**	**100.0%**

2020 HMDA LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	3.6%	24	0.5%	2	7.1%	109	2.3%
Moderate	5	17.9%	421	8.8%	2	7.1%	213	4.4%
Middle	21	75.0%	4,027	84.0%	2	7.1%	229	4.8%
Upper	1	3.6%	320	6.7%	18	64.3%	3,544	74.0%
Unknown	0	0.0%	0	0.0%	4	14.3%	697	14.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**28**	**100.0%**	**4,792**	**100.0%**	**28**	**100.0%**	**4,792**	**100.0%**
Refinance								
Low	2	6.5%	111	3.9%	3	9.7%	193	6.8%
Moderate	1	3.2%	94	3.3%	4	12.9%	322	11.4%
Middle	27	87.1%	2,418	85.7%	7	22.6%	498	17.7%
Upper	1	3.2%	197	7.0%	10	32.3%	1,229	43.6%
Unknown	0	0.0%	0	0.0%	7	22.6%	578	20.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**31**	**100.0%**	**2,820**	**100.0%**	**31**	**100.0%**	**2,820**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	2	12.5%	70	9.7%
Moderate	2	12.5%	145	20.1%	5	31.3%	197	27.2%
Middle	14	87.5%	578	79.9%	4	25.0%	286	39.6%
Upper	0	0.0%	0	0.0%	5	31.3%	170	23.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**723**	**100.0%**	**16**	**100.0%**	**723**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

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

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	33.3%	151	42.4%	4	44.4%	102	28.7%
Middle	6	66.7%	205	57.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	5	55.6%	254	71.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**356**	**100.0%**	**9**	**100.0%**	**356**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	3	3.6%	135	1.6%	7	8.3%	372	4.3%
Moderate	11	13.1%	811	9.3%	15	17.9%	834	9.6%
Middle	68	81.0%	7,228	83.2%	13	15.5%	1,013	11.7%
Upper	2	2.4%	517	5.9%	38	45.2%	5,197	59.8%
Unknown	0	0.0%	0	0.0%	11	13.1%	1,275	14.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**84**	**100.0%**	**8,691**	**100.0%**	**84**	**100.0%**	**8,691**	**100.0%**

2021 HMDA LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	2	8.3%	110	3.0%	0	0.0%	0	0.0%
Moderate	9	37.5%	1,344	37.0%	3	12.5%	444	12.2%
Middle	13	54.2%	2,176	59.9%	8	33.3%	657	18.1%
Upper	0	0.0%	0	0.0%	12	50.0%	2,403	66.2%
Unknown	0	0.0%	0	0.0%	1	4.2%	126	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**24**	**100.0%**	**3,630**	**100.0%**	**24**	**100.0%**	**3,630**	**100.0%**
Refinance								
Low	3	8.6%	207	7.4%	4	11.4%	213	7.7%
Moderate	8	22.9%	591	21.2%	10	28.6%	630	22.6%
Middle	24	68.6%	1,986	71.3%	8	22.9%	548	19.7%
Upper	0	0.0%	0	0.0%	12	34.3%	1,296	46.6%
Unknown	0	0.0%	0	0.0%	1	2.9%	97	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**35**	**100.0%**	**2,784**	**100.0%**	**35**	**100.0%**	**2,784**	**100.0%**
Home Improvement								
Low	1	9.1%	20	5.6%	4	36.4%	97	27.4%
Moderate	3	27.3%	127	35.9%	0	0.0%	0	0.0%
Middle	7	63.6%	207	58.5%	3	27.3%	151	42.7%
Upper	0	0.0%	0	0.0%	4	36.4%	106	29.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**11**	**100.0%**	**354**	**100.0%**	**11**	**100.0%**	**354**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	12.5%	160	21.7%	1	12.5%	20	2.7%
Middle	7	87.5%	577	78.3%	4	50.0%	599	81.3%
Upper	0	0.0%	0	0.0%	2	25.0%	100	13.6%
Unknown	0	0.0%	0	0.0%	1	12.5%	18	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**8**	**100.0%**	**737**	**100.0%**	**8**	**100.0%**	**737**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	6	7.7%	337	4.5%	8	10.3%	310	4.1%
Moderate	21	26.9%	2,222	29.6%	14	17.9%	1,094	14.6%
Middle	51	65.4%	4,946	65.9%	23	29.5%	1,955	26.0%
Upper	0	0.0%	0	0.0%	30	38.5%	3,905	52.0%
Unknown	0	0.0%	0	0.0%	3	3.8%	241	3.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**78**	**100.0%**	**7,505**	**100.0%**	**78**	**100.0%**	**7,505**	**100.0%**

2022 HMDA LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	4	13.8%	186	4.4%	7	24.1%	564	13.3%
Moderate	10	34.5%	1,340	31.5%	5	17.2%	827	19.4%
Middle	15	51.7%	2,728	64.1%	5	17.2%	959	22.5%
Upper	0	0.0%	0	0.0%	7	24.1%	1,082	25.4%
Unknown	0	0.0%	0	0.0%	5	17.2%	822	19.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**29**	**100.0%**	**4,254**	**100.0%**	**29**	**100.0%**	**4,254**	**100.0%**
Refinance								
Low	1	4.0%	72	2.6%	2	8.0%	113	4.1%
Moderate	17	68.0%	1,546	55.8%	6	24.0%	485	17.5%
Middle	7	28.0%	1,153	41.6%	7	28.0%	819	29.6%
Upper	0	0.0%	0	0.0%	4	16.0%	328	11.8%
Unknown	0	0.0%	0	0.0%	6	24.0%	1,026	37.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**25**	**100.0%**	**2,771**	**100.0%**	**25**	**100.0%**	**2,771**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	7	46.7%	212	33.8%	3	20.0%	120	19.1%
Middle	8	53.3%	415	66.2%	7	46.7%	340	54.2%
Upper	0	0.0%	0	0.0%	4	26.7%	144	23.0%
Unknown	0	0.0%	0	0.0%	1	6.7%	23	3.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**15**	**100.0%**	**627**	**100.0%**	**15**	**100.0%**	**627**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	2	18.2%	25	3.8%
Moderate	4	36.4%	336	51.1%	3	27.3%	137	20.9%
Middle	7	63.6%	321	48.9%	3	27.3%	366	55.7%
Upper	0	0.0%	0	0.0%	3	27.3%	129	19.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**11**	**100.0%**	**657**	**100.0%**	**11**	**100.0%**	**657**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	5	6.3%	258	3.1%	11	13.8%	702	8.4%
Moderate	38	47.5%	3,434	41.3%	17	21.3%	1,569	18.9%
Middle	37	46.3%	4,617	55.6%	22	27.5%	2,484	29.9%
Upper	0	0.0%	0	0.0%	18	22.5%	1,683	20.3%
Unknown	0	0.0%	0	0.0%	12	15.0%	1,871	22.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**80**	**100.0%**	**8,309**	**100.0%**	**80**	**100.0%**	**8,309**	**100.0%**

CRA APPENDIX C: SMALL BUSINESS LOAN DISTRIBUTION TABLES

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	1	5.6%	110	6.9%	0	0.0%	0	0.0%
Moderate	4	22.2%	300	18.9%	0	0.0%	0	0.0%
Middle	13	72.2%	1,181	74.2%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**18**	**100.0%**	**1,591**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	13	72.2%	1,251	78.6%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	5	27.8%	340	21.4%	0	0.0%	0	0.0%
Total	**18**	**100.0%**	**1,591**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	12	66.7%	556	34.9%	0	0.0%	0	0.0%
$100,001 - $250,000	5	27.8%	726	45.6%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	5.6%	309	19.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**18**	**100.0%**	**1,591**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	8	61.5%	381	30.4%	0	0.0%	0	0.0%
$100,001 - $250,000	4	30.8%	561	44.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	7.7%	309	24.7%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,251**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	20.0%	101	5.7%	0	0.0%	0	0.0%
Middle	8	80.0%	1,663	94.3%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**1,764**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	8	80.0%	1,619	91.8%	0	0.0%	0	0.0%
Over $1 Million	2	20.0%	145	8.2%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**1,764**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	6	60.0%	387	21.9%	0	0.0%	0	0.0%
$100,001 - $250,000	1	10.0%	148	8.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	3	30.0%	1,229	69.7%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**1,764**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	4	50.0%	242	14.9%	0	0.0%	0	0.0%
$100,001 - $250,000	1	12.5%	148	9.1%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	3	37.5%	1,229	76.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**8**	**100.0%**	**1,619**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	13	100.0%	459	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**459**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	4	30.8%	181	39.4%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	9	69.2%	278	60.6%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**459**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	12	92.3%	346	75.3%	0	0.0%	0	0.0%
$100,001 - $250,000	1	7.7%	113	24.7%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**459**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	4	100.0%	181	100.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**181**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

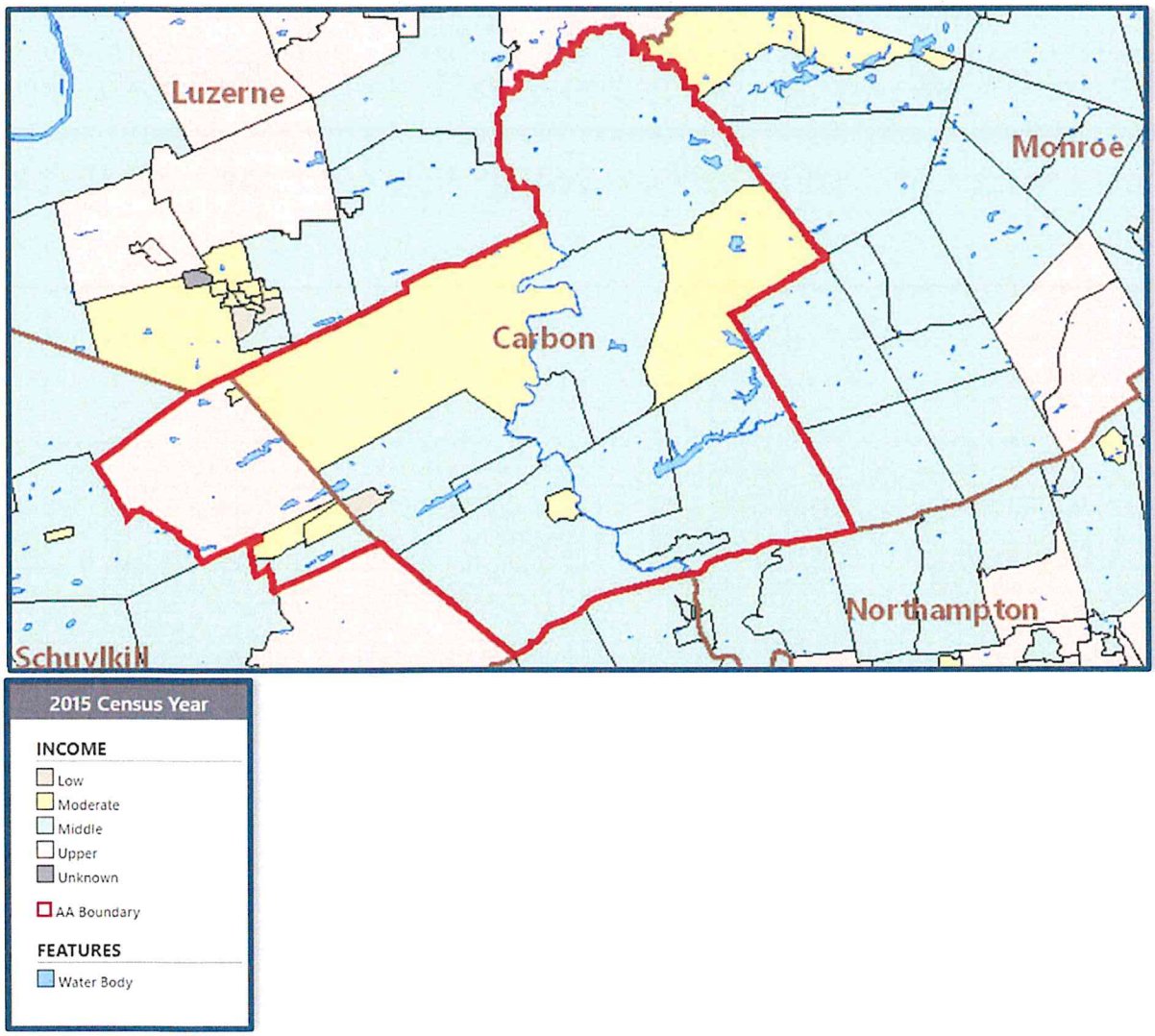
Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	13	100.0%	1,426	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,426**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	12	92.3%	864	60.6%	0	0.0%	0	0.0%
Over $1 Million	1	7.7%	563	39.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,426**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	11	84.6%	560	39.3%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	2	15.4%	866	60.7%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,426**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	11	91.7%	560	64.8%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	8.3%	304	35.2%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**864**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CARBON COUNTY, PA ASSESSMENT AREA)

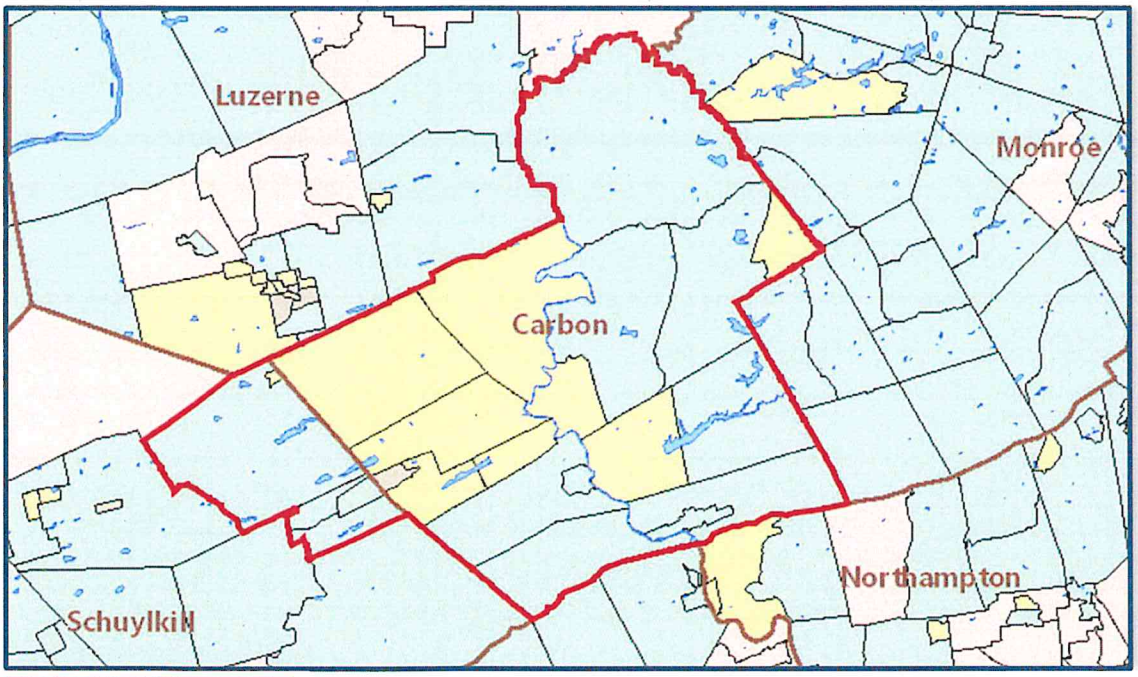
Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	50.0%	1,580	64.7%	0	0.0%	0	0.0%
Middle	6	50.0%	861	35.3%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**2,441**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	11	91.7%	2,341	95.9%	0	0.0%	0	0.0%
Over $1 Million	1	8.3%	100	4.1%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	2,441	100.0%	0	0.0%	0	0.0%
By Loan Size								
$100,000 or less	7	58.3%	416	17.0%	0	0.0%	0	0.0%
$100,001 - $250,000	2	16.7%	457	18.7%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	3	25.0%	1,568	64.3%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**2,441**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	6	54.5%	316	13.5%	0	0.0%	0	0.0%
$100,001 - $250,000	2	18.2%	457	19.5%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	3	27.3%	1,568	67.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**11**	**100.0%**	**2,341**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

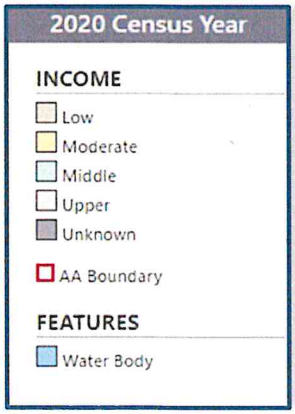
CRA APPENDIX D: ASSESSMENT AREA MAPS

CARBON COUNTY, PA ASSESSMENT AREA (2015 ACS DATA)



CARBON COUNTY, PA ASSESSMENT AREA (2020 CENSUS DATA)

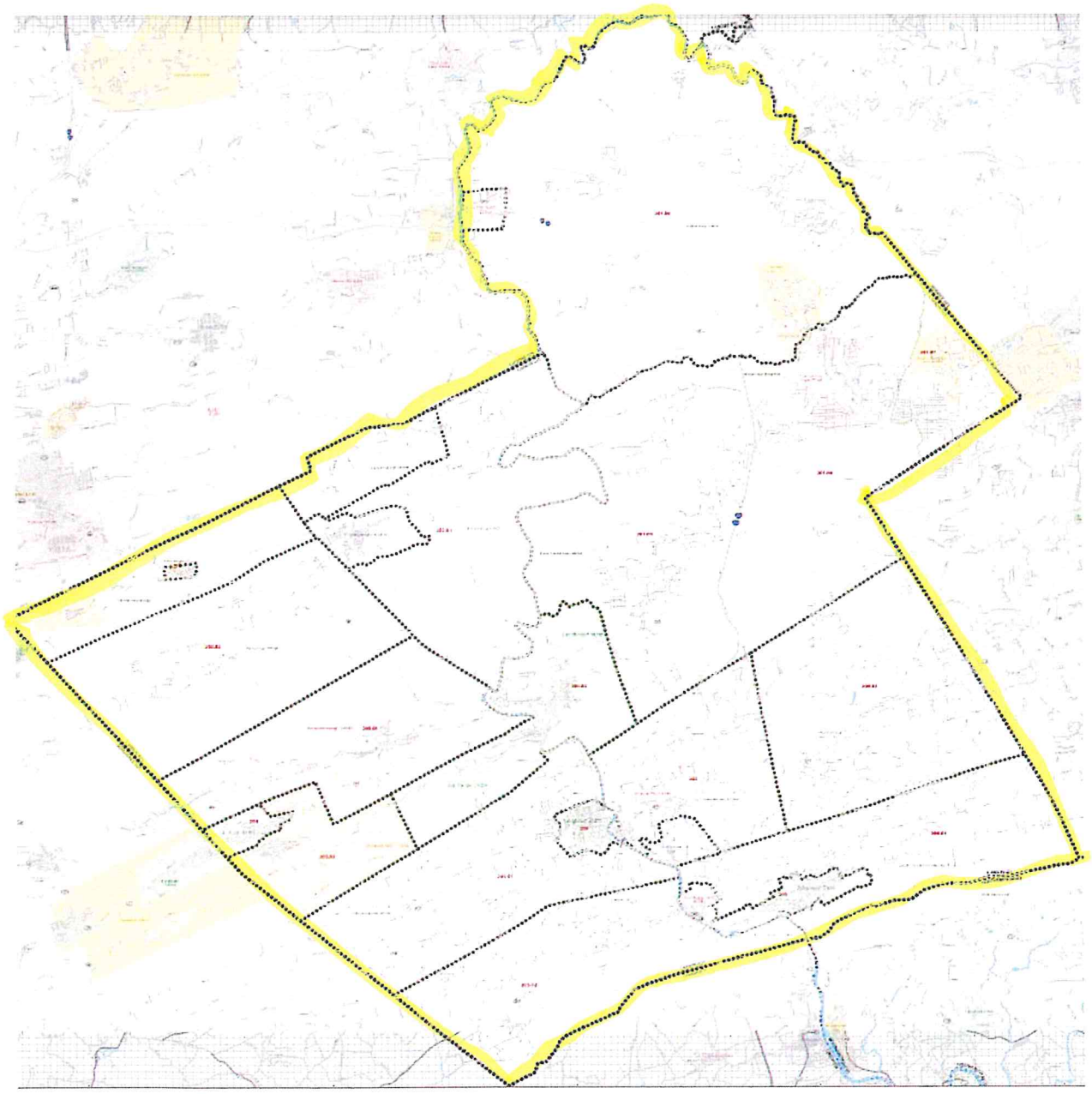




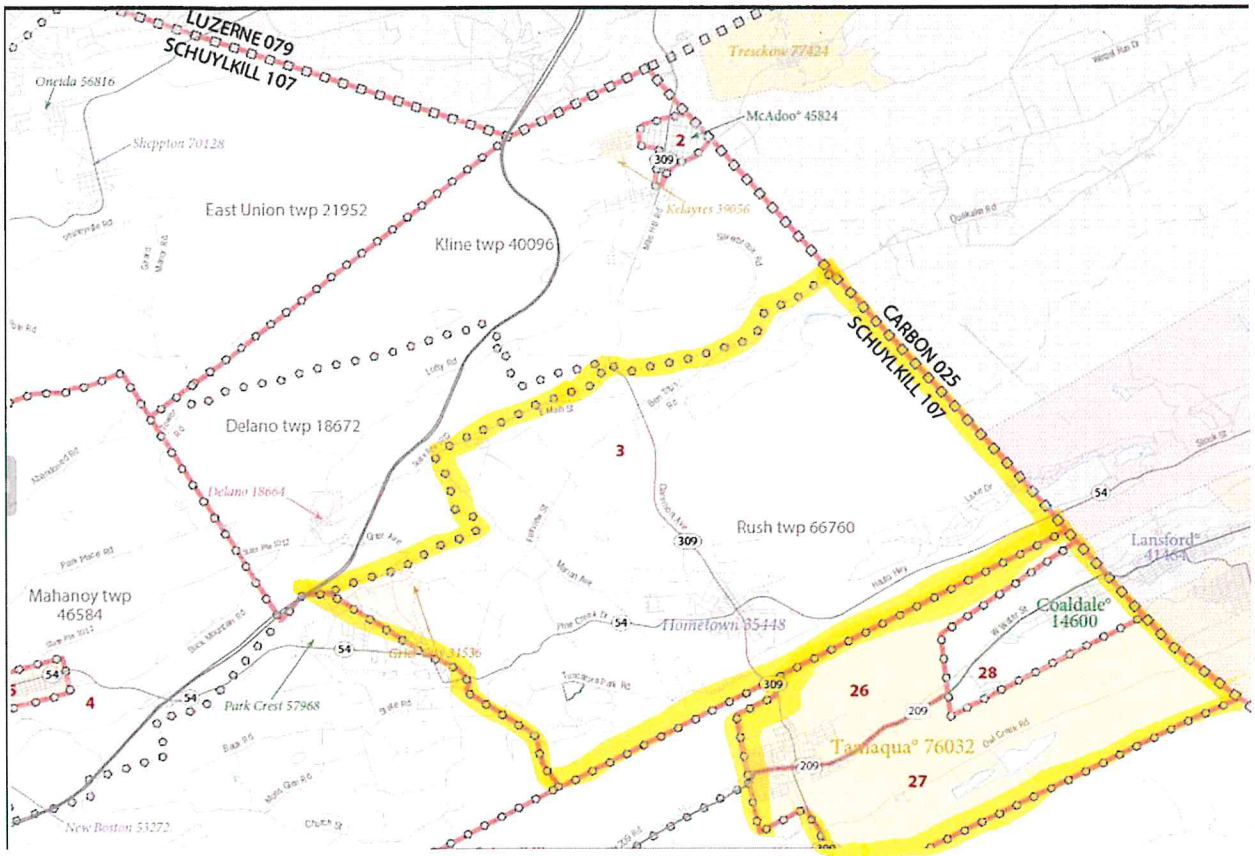
Home Mortgage Disclosure Act Notice

The Home Mortgage Disclosure Act (HMDA) data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's (CFPB) web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this web site.

Census Tract Map for Carbon County



Census Tract Map for Coaldale/Tamaqua Area/Rush Township Area



JTNB

Loan to Deposit Ratio

1Q 2024 - 3Q 2026

Quarter Ending	Percentage
March 31, 2024	57%
June 30, 2024	57%
September 30, 2024	51%
December 31, 2024	52%
March 31, 2025	56%
June 30, 2025	56%
September 30, 2025	52%
December 31, 2025	52%
March 31, 2026	53%
June 30, 2026	51%
September 30, 2026	52%

Percentage of Loan Portfolio in Total Assets as of September 2026	**49%**

Jim Thorpe Neighborhood Bank

Listing of Bank's Branches, Addresses, & Geographies

JTNB Branches

Branch Name	Street Address	Town	State	ZIP Code	MSA	State	County	Census Tract	Tract Income Level
Main Office	12 Broadway	Jim Thorpe	PA	18229	10900	42	025	0201.02	Moderate
Center Street	418 Center St.	Jim Thorpe	PA	18229	10900	42	025	0201.02	Moderate
Penn Forest	1397 State Rte. 903	Jim Thorpe	PA	18229	10900	42	025	0201.03	Middle
Lehighton	145 S. 4th St.	Lehighton	PA	18235	10900	42	025	0206.00	Middle
Nesquehoning	301 W. Catawissa St.	Nesquehoning	PA	18240	10900	42	025	0203.01	Moderate
Lansford	430 W. Patterson St.	Lansford	PA	18232	10900	42	025	0204.00	Low

JTNB ATMs

ATM Location	Street Address	Town	State	ZIP Code	MSA	State	County	Census Tract	Tract Income Level	Accepts Deposits?
Main Office	12 Broadway	Jim Thorpe	PA	18229	10900	42	025	0201.02	Moderate	No
Center Street	418 Center St.	Jim Thorpe	PA	18229	10900	42	025	0201.02	Moderate	No
Jim Thorpe Market	1 River Rd.	Jim Thorpe	PA	18229	10900	42	025	0201.02	Moderate	No
Penn Forest	1397 State Rte. 903	Jim Thorpe	PA	18229	10900	42	025	0201.03	Middle	No
Lehighton	145 S. 4th St.	Lehighton	PA	18235	10900	42	025	0206.00	Middle	No
Nesquehoning	301 W. Catawissa St.	Nesquehoning	PA	18240	10900	42	025	0203.01	Moderate	No
Lansford	430 W. Patterson St.	Lansford	PA	18232	10900	42	025	0204.00	Low	No

BRANCH HOURS OF OPERATION

Main Office Lobby:
Mon. -Thurs.: 9:00 A.M. - 4:00 P.M.
Friday: 9:00 A.M. - 6:00 P.M.

Center Street Office & Drive Through:
Monday -Wednesday: 9:00 A.M. - 4:00 P.M.
Thursday: 9:00 A.M. - 4:00 P.M. Lobby (*9:00 A.M. – 5:00 P.M. Drive Through*)
Friday: 9:00 A.M. - 6:00 P.M.
Saturday: 9:00 A.M. – 12:00 P.M.

Penn Forest Office & Drive Through:
Monday - Thursday: 9:00 A.M. - 4:00 P.M.
Friday: 9:00 A.M. - 6:00 P.M.
Saturday: 9:00 A.M. – 12:00 P.M.

Lehighton Office & Drive Through:
Monday - Thursday: 9:00 A.M. - 4:00 P.M.
Friday: 9:00 A.M. - 6:00 P.M.
Saturday: 9:00 A.M. - 12:00 P.M.

Nesquehoning Office & Drive Through:
Monday – Thursday: 9:00 A.M. – 4:00 P.M.
Friday: 9:00 A.M. – 6:00 P.M.
Saturday: 9:00 A.M. - 12:00 P.M.

Lansford Office & Drive Through:
Monday – Thursday: 9:00 A.M. – 4:00 P.M.
Friday: 9:00 A.M. – 6:00 P.M.
Saturday: 9:00 A.M. - 12:00 P.M.

Credit Services Provided:

The following types of credit services are provided on a non-discriminatory basis to individuals and businesses located in our trading area. All credit extensions are subject to appropriate credit and collateral requirements.

- Real estate loans secured by a primary residence
- Real estate loans secured by 1-4 family residential units
- Real estate loans secured by 1-4 family investment property
- Blanket mortgages
- Nonresidential real estate loans
- Interim construction financing
- Home equity loans
- Commercial business loans
- Automobile loans
- Personal loans for purchase of consumer goods
- Personal unsecured lines of credit
- Home equity line of credit
- Unsecured loans
- Personal secured loans
- Municipal Loans
- Visa ® card (through TCM Bank)

Deposit Services Provided:

JTNB offers a wide variety of deposit services for its customers including checking, savings, certificates of deposit, individual retirement accounts, commercial checking accounts, and others:

Checking Accounts

- Classic Checking
- E-Checking
- All American 50 Checking*
- All American 50 Gold Checking*
- Student Checking
- N.O.W. Checking
- Money Market Accounts
- Business Checking

*JTNB maintains a low-cost checking account for anyone fifty (50) years of age or older.

Government checks are cashed at no charge to customers, and there is no charge for obtaining funds through the ACH (Automated Clearing House) method.

Savings Accounts

- Statement Savings
- Christmas Clubs
- All Purpose Clubs
- Certificates of Deposit
- Individual Retirement Accounts

Other Services

- Wire Transfers
- Night Deposit
- Direct Deposit
- Drive-Through Banking
- Money Orders
- Telephone Transfers
- Automatic Teller Machines
- Remote Deposit Capture (RDC)
- InfoLink (*telephone banking*)
- Safe Deposit Boxes
- Utility Payments
- iBanking *(online banking)* & Bill Payment
- Cash Advances
- Bank-by-Mail
- iMobile *(mobile banking)*
- Digital Wallet

SCHEDULE OF FEES

JTNB
Jim Thorpe Neighborhood Bank
Member FDIC Equal Housing Lender

ACCOUNT FEES

Insufficient Funds Charge – Per Item $28.00
An insufficient funds charge may be created by check, in person withdrawal, ATM withdrawal, or other electronic means.

Uncollected Funds Charge – Per Item $28.00
An insufficient funds charge may be created by check, in person withdrawal, ATM withdrawal, or other electronic means.

Debit Card Replaced $10.00
Account Closed within 90 Days – Per Account $10.00
Hold on Account – Per Account $30.00
Stop Payment Fee – Per Item $25.00
Certified Check Fee – Per Check $15.00
Returned Check Charge – Per Item $10.00
Levy Fee $75.00
Garnishment Fee ..... $100.00 +
plus associated fees
Domestic Relations Levy Fee $50.00
Statement Activity Printout ..... $ 5.00
Research Fee/Account Balancing Assistance – Per Hour .. $15.00
½ Hour Minimum
Telephone Transfer Fee ..... $ 5.00
Club Account Early Withdrawal Fee ..... $ 5.00
Acct (Account) Inactivity Fee – Per Month ..... $ 5.00
OD (Overdraft) Protection Tran. (Transfer) Fee –
Per Transfer ..... $ 5.00
Escheat Processing Fee $50.00

MISCELLANEOUS FEES/CHARGES

Miscellaneous

Check Printing ..... Fees Vary by Style
Counter Checks (4 Checks per Page) ..... $ 1.00
Photocopy – Per Copy ..... $ 0.35
Check Cashing Fee (Non-Customer) –Per Occurrence ..... $ 5.00
Checks up to and including $ 100.00 only
Signature Guarantee – Per Guarantee $10.00
Zipper Bag ..... $ 3.00
Indemnity Bond – Per Request ..... $ 5.00
IRA External Transfer $25.00
Currency/Coin Request (Regular – $10,000+) $25.00
Currency/Coin Request (Special – $10,000+) ..... Actual Cost*
**Fee is determined by the Actual Cost for Armored Courier Service.*

Official Checks

Money Order – Per Item ..... $ 5.00

Wire Transfers

(Outgoing) Wire Transfer Fee – Per Transfer $25.00
(Incoming) Wire Transfer Fee – Per Transfer $15.00
(Outgoing) (Foreign) Wire Transfer Fee – Per Transfer $45.00

Night Depository

Night Deposit Bag $28.00
Key ..... $ 3.00

Safety Deposit Box

Box Rental – Per Year ..... $25.00-$95.00
Duplicate Key $20.00
Drilling ..... Actual Cost
Box Inventory $25.00

iBanking (Online Banking) ..... FREE**
iMobile (iBanking Feature via Smart Device) ..... FREE**
InfoLink (Telephone Banking) ..... FREE**
Bill Payment – Per Bill Paid ..... $ 0.60
***Fees are incurred for using the Bill Payment Service and third-party data, internet or texting charges may apply.*

ATM Withdrawal Service Charge

For each transaction or each transfer that you make using an ATM not owned by JTNB ..... $ 1.00

POS Withdrawal Service Charge

For each Point of Sale (POS) transaction when you use your Debit Card PIN number ..... $ 1.00

Effective 01/09/2025

Listing of Branches Opened or Closed by JTNB

3rd Quarter 2026: None

2nd Quarter 2026: None

1st Quarter 2026: None

2025: None

2024: None

Jim Thorpe Neighborhood Bank

Comments Received from the Public/Bank Response

Jim Thorpe Neighborhood Bank (JTNB) has not received any comments from the public for the current year or prior two calendar years that specifically relates to the JTNB's performance in helping to meet community credit needs.

As of Quarter Ending:	Public Comments Received:	JTNB's Response:
1Q 2024	None	N/A
2Q 2024	None	N/A
3Q 2024	None	N/A
4Q 2024	None	N/A
1Q 2025	None	N/A
2Q 2025	None	N/A
3Q 2025	None	N/A
4Q 2025	None	N/A
1Q 2026	None	N/A
2Q 2026	None	N/A
3Q 2026	None	N/A

Community Reinvestment Act Notice:

You may obtain our current CRA Statement by writing to:

CRA Officer
Jim Thorpe Neighborhood Bank
12 Broadway, P.O. Box 209
Jim Thorpe, PA 18229

You may send signed, written comments about our CRA Statement or performance in helping to meet the community credit needs to:

CRA Officer
Jim Thorpe Neighborhood Bank
12 Broadway, P.O. Box 209
Jim Thorpe, PA 18229

AND TO

Federal Reserve Bank of Philadelphia
Ten Independence Mall
Philadelphia, PA 19106-1574

Your letter, together with any response by us, may be made public.

You may examine a file of all signed, written comments received by JTNB within the past two (2) years, any responses we have made to the comments, and all CRA Statements in effect during the past two (2) years.

You may ask to look at any comments received by the Federal Reserve Board of Philadelphia.

You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Federal Reserve Board of Philadelphia at:

Jim Thorpe Neighborhood Bank
12 Broadway, PO Box 209
Jim Thorpe, PA 18229