

#### Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

#### **PUBLIC DISCLOSURE**

#### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

September 30, 1997

CoreStates Bank, N.A. Charter Number: 1 Broad and Chestnut Sts. Post Office Box 7618 Philadelphia, Pa. 19107

NOTE: 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.

#### GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of <u>CoreStates Bank N.A.</u> prepared by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency.

The evaluation represents the OCC's current assessment and rating of the institution's CRA performance based on an examination conducted as of September 30, 1997. The CRA examination commenced April 1, 1997. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977 (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution, and (2) take that record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the Agencies to make public certain portions of their CRA performance assessments of financial institutions.

#### Basis for the Rating

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

#### **ASSIGNMENT OF RATING**

#### Identification of Ratings:

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low-and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderateincome neighborhoods, in a manner consistent with its resources and capabilities.

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance in meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

#### DISCUSSION OF INSTITUTION'S PERFORMANCE

#### **Institution's Rating:**

Based on the findings presented below, this institution is rated: **Outstanding record of meeting community credit needs.** 

**Evaluation Period** - The bank's previous Public Disclosure is dated August 21, 1995. The current disclosure contains an evaluation of the bank's performance from August 22,1995 through September 30, 1997. In addition to data supplied by bank management, information was also garnered from contacts made by representatives from the OCC and other regulatory agencies with community organizations in Pennsylvania, Delaware and New Jersey.

#### BANK PROFILE

CoreStates Bank N.A. (CBNA) is the lead bank subsidiary of the \$45 billion CoreStates Financial Corp headquartered in Philadelphia, Pennsylvania and represents the largest locally owned financial institution remaining in the city of Philadelphia. The financial size and geographic face of CBNA changed significantly in 1996. In April 1996, CoreStates acquired the \$15 billion Meridian bank holding company which had previously purchased the United Counties Bancorporation in New Jersey in February 1996. The former Meridian Pennsylvania and Delaware banking branches were consolidated into CBNA in the third quarter of 1996. The former Meridian and United Counties New Jersey branches were first consolidated with the New Jersey National Bank (NJNB) subsidiary of CoreStates and then merged into the single CBNA charter in the fourth quarter of 1996. As a result, the CBNA market area expanded to include northern, central and southeastern Pennsylvania, central and southern New Jersey and the state of Delaware.

CBNA is recognized as a leader in lending to low-to-moderate (LMI) income geographies. It is the leading bank in market share for consumer banking services in eastern and central Pennsylvania, Delaware and New Jersey based on deposit share and on relationships with nearly half of all households in the 47 county region. It is number one for small business lending (under \$2 million in sales) based on 11 consecutive years as the area's top SBA lender and on relationships with one out of four small businesses. CBNA also holds a one-third market share in the intermediate and middle market business lending (\$2 million - 250 million in sales.)

#### **COMMUNITY PROFILE**

CoreStates delineated communities, under the revised CRA regulation, covers 19 Metropolitan Statistical Areas (MSA') located in 47 counties in the states of Delaware, New Jersey and Pennsylvania. For illustration purposes in this evaluation we have divided the delineated communities into the six regions as detailed on the following page:

REGION	STATE	MSA	COUNTY
Delaware	Delaware	2190	Kent
		9160	New Castle
		N/A*	Sussex
New Jersey	New Jersey	6160	Burlington, Camden, Gloucester, Salem
		5640	Essex, Union, Morris
		8480	Mercer
		5015	Hunterdon, Middlesex, Somerset
		5190	Monmouth, Ocean
		0560	Atlantic, Cape May
		8760	Cumberland
Metropolitan	Pennsylvania	6160	Bucks, Chester, Delaware, Montgomery, Philadelphia
Keystone	Pennsylvania	6680	Berks
		4000	Lancaster
		N/A*	Schuykill
Northeastern	Pennsylvania	7560	Lackawanna, Luzerne
		5660	Pike
		0240	Lehigh, Northampton
		N/A*	Susquehanna
Susquehanna	Pennsylvania	3240	Cumberland, Dauphin, Lebanon
		8050	Centre
		9140	Lycoming
		9280	York
		N/A*	Adams, Bradford, Potter, Tioga, Clinton, Montour, Northumberland, Union

(N/A\* - Counties located in non-designated MSA areas)

A demographic breakdown of CBNA's regions by total population and tract characteristic is provided in the following table:

REGION	TOTAL	% OF POPULATION BY TRACT CHARACTERISTIC					
	POPULATION	LOW	MODERATE	MIDDLE	UPPER		
Delaware	666,168	3%	12%	66%	19%		
New Jersey	5,676,099	5%	18%	49%	28%		
Metropolitan	3,728,909	10%	20%	42%	28%		
Keystone	911,930	2%	10%	76%	12%		
Northeastern	1,153,769	1%	10%	71%	18%		
Susquehanna	1,513,832	2%	10%	72%	16%		
Total	13,650,707	6%	16%	54%	24%		

The following table provides a breakdown by number and percentage of census tracts by income designation in CBNA's combined tri-state delineated community.

REGION	# of LOW	%	# of MOD	%	# of MIDDLE	%	# of UPPER	%	# of N/A*	%
Delaware	9	5%	25	14%	103	59%	31	18%	7	4%
New Jersey	104	7%	255	18%	664	47%	348	25%	38	3%
Metropolitan	87	9%	168	17%	395	41%	286	30%	28	3%
Keystone	6	3%	29	14%	153	73%	20	10%	2	1%
Northeastern	6	2%	42	13%	226	71%	43	13%	3	1%
Susquehanna	10	3%	47	14%	239	70%	43	13%	4	1%
Total	222	6%	566	17%	1,780	52%	771	23%	82	2%

\*column represents tracts where income information is not available.

<u>Assessment Factor A</u> - Activities conducted by the institution to ascertain the credit needs of its community, including the extent of the institution's efforts to communicate with members of its community regarding the credit services being provided by the institution.

- CBNA is diligent in its efforts to establish and maintain relationships with community organizations.
- The credit needs assessment process is sound. Management continues to successfully recognize and address the credit needs of its community.

CBNA has adopted a team approach to ascertain community credit needs. In the team-based system, product managers, marketing teams, lenders, branch managers and customer contact staff play integral roles in developing products, delivering information and obtaining feedback relating to community credit needs.

The Corporate Community Development (CCD) department performs many of the essential activities required to properly assess credit needs. The success of this process is attributable to management's strong commitment to community interaction with community-based organizations and community development intermediaries for credit needs ascertainment. CBNA utilizes regional teams to more accurately respond to specific community needs. Their activities revolve around daily communication between CoreStates lenders, grant makers, branch employees, community contacts, and prospective borrowers within each market region.

Additional credit needs assessment activities are performed by the Affordable Lending Unit (ALU) and Community Lending Division (CLD). The ALU conducts needs assessment through community involvement and partnering with conventional mortgage product teams. ALU's specialized mortgage loan originators (MLOs) work directly with CCD in meeting with community groups, Realtors, churches and local government housing agencies. The Community Lending Division provides support for "traditional" loan products offered to small businesses that are not served by other lending divisions of CBNA. These programs improve or streamline the lending process by providing low doc loans, credit scoring, long term approvals and other attractive methods.

The ascertainment process utilized by CoreStates determined the credit needs of the delineated community are centered around affordable housing, small business financing, financial counseling services and other community development programs. The following discusses some of the activities led by the bank to meet the credit needs within each market region.

### Philadelphia Metropolitan/Suburban Market Region

- The Philadelphia Commercial Development Corporation was designed to revitalize neighborhoods and assist small, minority and women owned businesses. CoreStates has worked with this organization via technical assistance and participating in guaranty loans to companies located in low-income neighborhoods.
- CoreStates is active in the Delaware Valley Mortgage Plan (DVMP). Lending activities through this plan include the metropolitan and suburban markets.

#### **Delaware Market Region**

• CoreStates joined the Delaware Community Investment Corporation to assist in providing financing for affordable housing in the State of Delaware.

#### **Keystone Market Region**

• CoreStates representatives are actively involved with the Greater Reading Housing Partnership. Through partnership with other local financial institutions, CoreStates provides loans and equity to local Berks County affordable housing projects.

#### **Susquehanna Market Region**

• CBNA provided construction and permanent financing together with an equity investment to construct six new units of affordable housing in York, Pa.

#### **Northeastern Market Region**

- Financing was provided to a minority-owned business to relocate to Easton, PA. Eighteen full-time employment opportunities were created as a result of this relocation.
- Operating contributions and investments in loan pools to provide first time home buyers with mortgage loans are some of the ways CoreStates participates with the Scranton Neighborhood Housing Services, Inc.
- CBNA plays a major role in the Bethlehem Economic Development Corporation Loan Pool which provides funds for the development and improvement of businesses in the city of Bethlehem.

#### **New Jersey Market Region**

- CoreStates has a lending relationship with the Tri-County Community Action Agency. This group, based in Bridgeton, NJ, provides a variety of social services and economic development programs throughout Salem, Gloucester and Cumberland Counties.
- CBNA provides grant funding, technical assistance and construction financing to Isles, Inc. This nonprofit organization is dedicated to community and environmental development in Trenton, NJ.
- The New Jersey Housing and Mortgage Finance Agency's Basic Home Buyers Program provides loans to low- and moderate-income individuals who are first time home buyers looking to live in an urban target area. CoreStates is a partner in this endeavor.

Assessment Factor C - The extent of participation by the institution's Board of Directors in formulating the institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

• The Board of Directors and senior management are dedicated to and actively involved in the oversight of CRA activities.

CBNA's Board of Directors and senior management play intricate roles in their institution's CRA efforts. Members of the board and management team are actively involved in numerous community organizations. This active involvement allows them to remain acutely aware of

community needs. Their ongoing commitment to community involvement and revitalization has insured CBNA's prominent position as a recognized leader in providing flexible products and unique delivery systems to all segments of their community, including LMI neighborhoods.

Although CRA involvement is main streamed throughout the expansive branch system in all markets, the Corporate Community Development (CCD) department remains a focal point of CRA efforts. CCD management reports directly to the board's Community Development Committee regarding new initiatives, products, delivery systems and budgetary matters. In addition, CCD developed a three year strategic plan for the lending division, outreach and contributions area, and the CoreStates Community Development Corporation. This plan is part of the overall corporate strategy and is approved by the Board of Directors. CCD is responsible for implementation and monitoring of the activities under the plan.

Management supports ongoing CRA education for all employees and ensures that all technical requirements of the act are adhered to.

#### II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED

**Assessment Factor B** - The extent of the institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the institution.

- Sound marketing programs and strategies effectively communicate the products and services offered throughout CBNA's community.
- Credit products targeted to low and moderate-income (LMI) individuals are well-marketed.

CBNA has a wide array of products and services available to the public. Numerous marketing vehicles are utilized to inform the public about these resources. Mass media is used to advertise retail and business products throughout the community. All of the major newspapers, radio and television stations promote the CoreStates name. However, CBNA's more prominent and effective marketing efforts are performed through its extensive involvement in it's community.

Geographic marketing teams are assigned to each region to more precisely determine the advertising strategies for the delineated community. A collection of advertisements, flyers, counter cards, handouts, etc... are available for circulation in the local markets. Local community newspapers are utilized for advertising CBNA products and services. In addition, the Corporate Community Development staff is active in sponsoring and participating in housing fairs, home ownership workshops, small business seminars and economic development conferences. Such forums allow for more "hands-on" marketing opportunities.

The Corporate Community Development department and Affordable Lending Unit specifically target their programs to low- and moderate-income neighborhoods through their daily interactions with community organizations. Internally, CCD managers are included in meetings with market presidents to ensure that appropriate promotional strategies are developed. Externally, CCD staff

members are active participants on numerous local boards and committees. This process effectively reaches the intended LMI neighborhoods and potential applicants.

<u>Assessment Factor I</u> - The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.

#### • CoreStates extends a significant amount of credit within its delineated community.

CoreStates offers a variety of consumer, mortgage, and business credit products in response to the credit needs of its delineated community. These products are part of a continuing effort designed to help address the financial needs of the community, including the needs of low- and moderate- income neighborhoods and individuals. The CRA Statement accurately reflects the types of credit offered by the bank.

#### **Home Mortgage Loans**

Tables 1, 2 and 3 show aggregate HMDA-reportable loan originations in the delineated communities. During the evaluation period approximately 97% of the total number and dollar of reportable HMDA loan originations were within the delineated community. The demographic information and HMDA originations (Table 1) collectively exhibit a good dispersion of HMDA loans throughout all areas.

Owner occupied housing units in the low- and moderate- income tracts comprise 3% and 12% of the total owner occupied housing units, respectively. As depicted in Table 1, the level of lending activity in the LMI tracts is responsive when considering the percentage of owner occupied housing units in the tracts available for HMDA reportable loans.

Table 1 Geographic Distribution of HMDA Loans within Delineated Community								
	% of Owner Occupied to Total Owner Occupied Occu		Percent of Total					
Low-Income Tract	3%	755	3%	\$13,706	1%			
Moderate-Income Tract	12%	3,490	12%	\$85,034	9%			
Middle-Income Tract	57%	17,135	59%	\$572,766	56%			
Upper-Income Tract	27%	7,696	26%	\$341,117	34%			
Not Applicable	1%	4	*	\$352	*			
TOTAL	100%	29,080	100%	\$1,012,975	100%			

Source: 1996 and 1st Quarter 1997 HMDA LAR, FFIEC, 1996 Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

Table 2 shows HMDA originations by number and dollar amount in each region. Thirty-six percent of all HMDA loans made and 25% of all the dollars lent went to LMI borrowers. The aggregate lending data shows a commensurate level of lending to LMI individuals when considering LMI families represent 37% of the population. The aggregate level of lending activity

Not Applicable = income information on borrower was not available

<sup>\*</sup> denotes less than 1%

in LMI census tracts is very good in relation to the low (5%) and moderate (16%) income population in the delineated communities.

	Table 2 HMDA Loan Summary by Borrower Income Level and Region									
		Borrower Income								
Number	Ţ	Nr. 1	M. 1 II	T	Not	75.4.1				
Amount (ooo's)	Low	Moderate	Middle	Upper	Applicable	Total				
Philadelphia	2,300	2,685	2,943	4,338	200	12,466				
Metropolitan Region	\$42,979	\$74,077	\$94,802	\$197,092	\$5,892	\$414,842				
Pennsylvania Susquehanna	361	738	1,056	1,700	25	3,880				
Region	\$5,943	\$17,951	\$32,711	\$74,942	\$807	\$132,354				
Pennsylvania Northeastern	270	545	705	1,059	30	2,609				
Region	\$5,024	\$17,119	\$26,538	\$57,575	\$2,357	\$108,613				
Pennsylvania	353	643	853	1,238	37	3,124				
Keystone Region	\$5,913	\$15,536	\$25,981	\$54,314	\$1,041	\$102,785				
New Jersey	709	1,130	1,512	2,144	78	5,573				
Region	\$14,188	\$33,067	\$50,182	\$93,194	\$3,606	\$194,237				
State of	250	398	372	396	12	1,428				
Delaware Region	\$6,676	\$14,818	\$14,716	\$23,161	\$773	\$60,144				
TOTAL	4,243	6,139	7,441	10,875	382	29,080				
	\$80,723	\$172,568	\$244,930	\$500,278	\$14,476	\$1,012,975				

Source: 1996 and 1st Quarter 1997 HMDA LAR

Not Applicable = Income information on borrower was not available

Table 3 shows HMDA originations by census tract characteristic and region. The aggregate lending data shows a reasonable level of lending in LMI census tracts when considering the percentage of low- and moderate- owner occupied units in the regions. Overall, 15% of the number of originations and 10% of the dollars originated where in low- and moderate- income census tracts. These numbers compare favorably with the percentage of owner occupied units (15%) in the LMI communities.

	Table 3 HMDA Loan Summary by Census Tract and Region									
		Census Tract Income								
Number					Not					
Amount (000's)	Low	Moderate	Middle	Upper	Applicable	Total				
Philadelphia	566	1,979	5,774	4,143	4	12,466				
Metropolitan Region	\$9,410	\$42,947	\$178,671	\$183,462	\$352	\$414,842				
Pennsylvania	22	354	2,993	511	0	3,880				
Susquehanna Region	\$501	\$9,130	\$103,614	\$19,109	\$0	\$132,354				
Pennsylvania Northeastern	17	152	1,926	514	0	2,609				
Region	\$368	\$4,518	\$73,328	\$30,399	\$0	\$108,613				
Pennsylvania	33	282	2,365	444	0	3,124				
Keystone Region	\$660	\$6,159	\$75,712	\$20,254	\$0	\$102,785				
New Jersey	91	582	3,140	1,760	0	5,573				
Region	\$2,224	\$17,883	\$103,152	\$70,978	\$0	\$194,237				
State of	26	141	937	324	0	1,428				
Delaware Region	\$543	\$4,397	\$38,289	\$16,915	\$0	\$60,144				
TOTAL	755	3,490	17,135	7,696	4	29,080				
	\$13,706	\$85,034	\$572,766	\$341,117	\$352	\$1,012,975				

Source: 1996 and 1st Quarter 1997 HMDA LAR

Not Applicable = income information on borrower was not available

#### Affordable Lending Programs

CoreStates offers a variety of traditional and customized mortgage products to help meet the needs of LMI borrowers. Customized products include features such as discounted rates, lender-paid private mortgage insurance, unlimited seller assistance, unlimited cash-on-hand, and loan-to-value ratios above the secondary market standards. CoreStates targets several products specifically to LMI areas and individuals. They design these products to provide financing to qualified low- and moderate- income borrowers who may not qualify based on traditional underwriting criteria. Pre-purchase counseling and home ownership education are available on some products to improve an applicants creditworthiness. During 1995 and 1996, the bank originated 1,712 loans totaling approximately \$86 million.

CoreStates has formed community-based partnerships with local municipalities and communities. These partnerships promote affordable housing based on general and specific underwriting guidelines customized to the needs of the local community/municipality.

#### **Small Business and Farm Loans**

CoreStates small business and farm lending activity is very responsive to the needs of its delineated communities. During 1996, CoreStates originated 3,084 loans totaling approximately \$725 million. Table 4 shows the distribution by number and amount of loans to businesses with

gross revenues of less than \$1 million and farms with gross annual revenues of less than \$500 thousand. First quarter 1997 data was not available.

Table 4: Small Business and Farm Lending Activity - 1996								
Region	Small	Business	Farm					
	Number of \$Total Loans(000) Loans		Number of Loans	\$Total Loans(000)				
Philadelphia Metropolitan	904	\$95,948	30	\$2,980				
State of Delaware	197	\$21,700	3	\$46				
Keystone	348	\$34,536	173	\$13,093				
Susquehanna	301	\$29,177	93	\$407,078				
Northeastern	449	\$39,359	8	\$791				
New Jersey	578	\$80,533	\$0	\$0				

<u>Assessment Factor J</u> - The institution's participation in governmentally-insured, guaranteed or subsidized loan programs for housing, small businesses, or small farms.

## • CBNA continues to be an active participant in governmentally insured loan programs.

The major guaranteed and/or subsidized government loan programs in which CBNA is actively involved are detailed in the following table:

Program	Year	Accounts	Dollars
FHA Mortgage Program	1995	17	\$ 1,467,750
	1996	299	\$22,801,811
VA Mortgage Program	1995	0	0
	1996	13	\$ 1,113,250
Pa. Housing Auth. Mortgage Program	1995	10	\$ 814,025
	1996	206	\$16,580,264
Small Business Administration	1995	289	\$40,658,000
	1996	200	\$39,073,000*

\* Includes loans made under the CCD SBA program

CBNA is involved in an array of SBA loan programs including but not limited to, the Low Documentation (LOWDOC), FASTRACK, CAPLines and the Minority Prequalification Loan

Program and Women's Prequalification Loan Program. In 1995, the bank re-entered the FHA and VA loan programs as a supplement to the mortgage product offered through the Delaware Valley Mortgage Program. Over 300 loans originated through these two programs in 1996. Also, as of March 31, 1997, forty FmHA Guaranteed loans totaling nearly \$6 million were outstanding.

## III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

#### **Reasonableness of Delineated Community**

A detailed description of the delineated communities in the tri-state area was provided in the community profile section of this evaluation. No low-to-moderate income communities were arbitrarily excluded. This designation is considered reasonable.

**Assessment Factor E** - The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

#### • CoreStates extends credit to all segments of its delineated community.

During the evaluation period approximately 97% of the total number and dollar of HMDA loan originations reported were within the delineated community. These loans are well disbursed throughout the community, including low- and moderate- income areas. The tables below present originations by income and tract characteristics and selected housing characteristics for each region.

#### Philadelphia Metropolitan Region:

Table 5 and 6, show CoreStates HMDA lending activity in the Philadelphia Metropolitan Region. This region has the highest percentage of LMI owner occupied units. The data in Table 5 show CoreStates is very responsive to the mortgage needs of the Philadelphia Metropolitan Region when comparing mortgage originations with owner occupied characteristics of the region. Lending activity (by number) in the low- income and moderate- income census tracts exceeds the percentage of owner occupied units to total housing units and is comparable to the percentage of owner occupied units to total owner occupied units.

#### Table 5 Philadelphia Metropolitan Region - Bank and Mortgage Company Mortgage Loans Originated January 1, 1996 through March 31, 1997 By Census Tract Characteristics\* **Originations** % of Owner Occupied to Census Tract % of Owner **Total Housing Units Characteristics:** Occupied to Total Owner # **Occupied** Units Low Income 5% 2% 4% 6% Moderate Income 12% 18% 16% 10% Middle Income 46% 44% 28% 44% Upper Income 32% 33% 44% 20% 100% 100% Total 64% 100%

The data in Table 6 shows CoreStates is very responsive to the needs of borrowers of different income levels when comparing the distribution of loans by borrower income with the percentage of families by tract characteristic. The data shows 39% of the families in the region are low- and moderate income and 39% of the loans went to low- and moderate income families in the region.

Table 6 Philadelphia Metropolitan Region - Bank and Mortgage Company Mortgage Loans Originated Jan 1, 1996 through March 31, 1997 By Borrower Income*							
Applicant Income as a % of MSA Median	Origin	ations	% of Families				
	#	\$					
Low Income	18%	10%	21%				
Moderate Income	21%	18%	18%				
Middle Income	24%	23%	23%				
Upper Income	35%	48%	38%				
Not Applicable	2%	1%	_				
Total	100%	100%	100%				

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

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<sup># -</sup> represents the number of loans by percentage

<sup>\$ -</sup> represents the dollar of loans by percentage

<sup># -</sup> represents the number of loans by percentage

<sup>\$</sup> - represents the dollar of loans by percentage

#### Susquehanna Region

Tables 7 and 8 show CoreStates HMDA activities. The data in Table 7 show CoreStates is very responsive to the mortgage needs of the Susquehanna Region when comparing mortgage originations with owner occupied characteristics of the region. Lending activity (by number) in the low- income and moderate- income census tracts exceeds the percentage of owner occupied units to total housing units and equals the percentage of owner occupied units to total owner occupied units.

Table 7 Pennsylvania Susquehanna Region - Bank and Mortgage Company Mortgage Loans Originated January 1, 1996 through March 31, 1997 By Census Tract Characteristics*								
Census Tract Characteristics:	Origin	ations	% of Owner Occupied to Total Housing Units	% of Owner Occupied to Total				
	#	\$		Owner Occupied Units				
Low Income	1%	<1%	**	1%				
Moderate Income	9%	7%	5%	8%				
Middle Income	77%	78%	49%	75%				
Upper Income	13%	15%	11%	16%				
Total	100%	100%	65%	100%				

\* - Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the

Census

The data in Table 8 on the following page show CoreStates' responsiveness to the needs of borrowers of different income levels when comparing borrower income with the percentage of families by tract characteristic. The data shows 35% of the families in the region are low- and moderate income and 28% of the loans went to LMI families in the region. Although the percentage of LMI HMDA originations is slightly lower than the percentage of LMI families, the number of LMI owner occupied units is minimal which limits the opportunities to extend HMDA related credit. (See Table 7 above.)

<sup># -</sup> represents the number of loans by percentage

<sup>\$ -</sup> represents the dollar of loans by percentage

<sup>\*\*-</sup> represents less than 1%

Table 8 Pennsylvania Susquehanna Region - Bank and Mortgage Company Mortgage Loans Originated Jan 1, 1996 through March 31, 1997 By Borrower Income*							
Applicant Income as a % of MSA Median							
	#	\$	Families				
Low Income	9%	4%	16%				
Moderate Income	19%	14%	19%				
Middle Income	28%	26%	27%				
Upper Income	44%	56%	38%				
Total	100%	100%	100%				

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

#### **Northeastern Region:**

Tables 9 and 10 show CoreStates HMDA lending activities in the Northeastern Region. The data in Table 9 shows CBNA is responsive to the mortgage needs of the region when comparing mortgage originations with owner occupied characteristics of the region. Lending activity (by number) in the low- income and moderate- income census tracts is comparable to the percentage of owner occupied units to total housing units and to the percentage of owner occupied units to total owner occupied units.

Table 9 Pennsylvania Northeastern Region - Bank and Mortgage Company Mortgage Loans Originated 1/1/96 through 3/ 31/97 By Census Tract Characteristics*								
Census Tract Characteristics:	Originations		% of Owner Occupied to Total Housing Units	% of Owner Occupied to Total				
	#	\$	-	Owner Occupied Units				
Low Income	1%	<1%	0%	<1%				
Moderate Income	6%	4%	7%	7%				
Middle Income	73%	68%	47%	74%				
Upper Income	20%	28%	12%	18%				
Total	100%	100%	66%	100%				

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

The data in Table 10 shows responsiveness to the needs of borrowers of different income levels. The data shows 37% of the families in the region are low- and moderate income and 31% of the loans went to low- and moderate income families in the region. Despite the low number of LMI owner occupied housing units which limits the volume of HMDA lending opportunities, the data show LMI lending penetration consistent with the overall lending pattern in other regions.

<sup># -</sup> represents the number of loans by percentage \$ - represents the dollar of loans by percentage

<sup># -</sup> represents the number of loans by percentage \$ - represents the dollar of loans by percentage

Table 10 Pennsylvania Northeastern Region - Bank and Mortgage Company Mortgage Loans Originated January 1, 1996 through March 31, 1997 By Borrower Income*					
Applicant Income as a % of MSA Median	Origin	ations	% of Families		
	#	\$			
Low Income	10%	5%	18%		
Moderate Income	21%	16%	19%		
Middle Income	27%	24%	25%		
Upper Income	41%	53%	38%		
Not Applicable	1%	2%	<1%		
Total	100%	100%	100%		

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Congress

**Keystone Region:** 

Tables 11 and 12 show CoreStates HMDA lending activities in the Keystone Region. The data in Table 11 shows CoreStates is very responsive to the mortgage needs of the Keystone Region when comparing mortgage originations with owner occupied characteristics of the region. Lending activity (by number) in the low- income and moderate- income census tracts equals or exceeds the percentage of owner occupied units to total housing units and the percentage of owner occupied units.

Table 11 Pennsylvania Keystone Region - Bank and Mortgage Company Mortgage Loans Originated January 1, 1996 through March 31, 1997 By Census Tract Characteristics*							
Census Tract Characteristics:	Origii	Originations % of Owner Occupied to % of Occupied to Total Housing Units Occupied					
	#	\$		Total Owner Occupied Units			
Low Income	1%	1%	1%	1%			
Moderate Income	9%	6%	6%	8%			
Middle Income	76%	73%	54%	78%			
Upper Income	14%	20%	9%	13%			
Total	100%	100%	70%	100%			

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

The data in Table 12 shows CoreStates is very responsive to the needs of borrowers of different income levels when comparing the distribution of loans by borrower income with the percentage of families by tract characteristic. The data shows 35% of the families in the region are low- and moderate income and 32% of the loans went to low- and moderate income families in the region.

<sup># -</sup> represents the number of loans by percentage

<sup>\$ -</sup> represents the dollar of loans by percentage

<sup># -</sup> represents the number of loans by percentage \$ - represents the dollar of loans by percentage

Table 12 Pennsylvania Keystone Region - Bank and Mortgage Company Mortgage Loans Originated Jan 1, 1996 through March 31, 1997 By Borrower Income*					
Applicant Income as a % of MSA Median	Origina	ations	% of Families		
	#	\$			
Low Income	11%	6%	16%		
Moderate Income	21%	15%	19%		
Middle Income	27%	25%	28%		
Upper Income	40%	53%	37%		
Not Applicable	1%	1%	<1%		
Total	100%	100%	100%		

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the

#### **New Jersey Region:**

Tables 13 and 14 show CoreSates HMDA lending activities in the New Jersey Region. This region has the second highest percentage of LMI owner occupied units of all the CoreStates regions. The data in Table 13 shows CBNA is very responsive to the mortgage needs of the New Jersey Region when comparing mortgage originations with owner occupied characteristics of the region. Lending activity (by number) in the low- income and moderate- income census tracts exceeds the percentage of owner occupied units to total housing units and is comparable to the percentage of owner occupied units to total owner occupied units.

Table 13 New Jersey Region - Bank and Mortgage Company Mortgage Loans Originated January 1, 1996 through March 31, 1997 By Census Tract Characteristics*						
Census Tract Characteristics:	Originations % of Owner Occupied to % of Owner Total Housing Units Occupied to					
	.,			Total Owner Occupied Units		
	# \$					
Low Income	2%	1%	1%	2%		
Moderate Income	10%	9%	8%	13%		
Middle Income	56%	53%	32%	52%		
Upper Income	32%	37%	20%	33%		
Total	100%	100%	100%	100%		

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

The data in Table 14 shows CoreStates is responsive to the needs of borrowers of different income levels when comparing the distribution of loans by borrower income with the percentage of families by tract characteristic. The data shows 36% of the families in the region are low- and moderate income and 33% of the loans went to low- and moderate income families in the region.

<sup># -</sup> represents the number of loans by percentage \$ - represents the dollar of loans by percentage

<sup># -</sup> represents the number of loans by percentage

Table 14 New Jersey Region - Bank and Mortgage Company Mortgage Loans Originated Jan 1, 1996 through March 31, 1997 By Borrower Income*					
Applicant Income as a % of MSA Median	Origina	ations	% of Families		
	#	\$			
Low Income	13%	7%	18%		
Moderate Income	20%	17%	18%		
Middle Income	27%	26%	25%		
Upper Income	39%	48%	39%		
Not Applicable	1%	2%	<1%		
Total	100%	100%	101%		

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Consus

- # represents the number of loans by percentage
- \$ represents the dollar of loans by percentage

#### **Delaware Region:**

Tables 15 and 16 show CoreStates HMDA lending activities in the Delaware Region. The data in Table 15 shows CoreStates is very responsive to the mortgage needs of the Delaware Region when comparing mortgage originations with owner occupied characteristics. Lending activity (by number) in the low- income and moderate- income census tracts exceeds the percentage of owner occupied units to total housing units and the percentage of owner occupied units to total owner occupied units.

Table 15 State of Delaware Region - Bank and Mortgage Company Mtge Loans Originated Jan 1, 1996 to March 31, 1997 By Census Tract Characteristics*						
Census Tract Characteristics:	Origin	Originations % of Owner Occupied to Total % of Owner Housing Units Occupied/ Total				
	#			Owner Occupied Units		
Low Income	2%	1%	1%	1%		
Moderate Income	10%	7%	6%	9%		
Middle Income	66%	64%	41%	69%		
Upper Income	22%	28%	13%	21%		
Total	100%	100%	61%	100%		

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

The data in Table 16 shows CoreStates is very responsive to the needs of borrowers of different income levels when comparing the distribution of loans by borrower income with the percentage of families by tract characteristic. The data show 36% of the families in the region are low- and moderate income and 45% of the loans went to low- and moderate income families in the region.

<sup># -</sup> represents the number of loans by percentage \$ - represents the dollar of loans by percentage

# Table 16 State of Delaware Region - Bank and Mortgage Company Mortgage Loans Originated January 1, 1996 through March 31, 1997 By Borrower Income\*

Applicant Income as a % of MSA Median	Originations		% of
	#	\$	Families
Low Income	17%	11%	17%
Moderate Income	28%	25%	19%
Middle Income	26%	24%	26%
Upper Income	28%	39%	38%
Not Applicable	1%	1%	<1%
Total	100%	100%	100%

<sup>\* -</sup> Information was derived from the HMDA-LAR required under the Home Mortgage Disclosure Act and 1990 Census Data, U.S. Bureau of the Census

#### **Small Business and Farm Loans**

During the evaluation period CoreStates was very active in small business and farm lending. The bank originated 3,084 small business and farm loans totaling \$724 million. Tables 17 and 18 illustrate a regional distribution of lending activity for both product types.

<sup># -</sup> represents the number of loans by percentage

<sup>\$ -</sup> represents the dollar of loans by percentage

Table 17 Small Business Lending Activity by Region - 1996					
		Ce	ensus Tract Inc	come	
Number	T	Madana	N/C: J J1 -	TT	T-4-1
Amount (000's)	Low	Moderate	Middle	Upper	Total
Philadelphia Matana Pitan	39	89	381	395	904
Metropolitan Region	\$3,004	\$8,017	\$39,372	\$45,555	\$95,948
Pennsylvania	7	48	209	37	301
Susquehanna Region	\$1,238	\$5,602	\$16,331	\$6,006	\$29,177
Pennsylvania	7	50	283	109	449
Northeastern Region	\$239	\$4,640	\$22,680	\$11,800	\$39,359
Pennsylvania	13	23	256	56	348
Keystone Region	\$748	\$2,323	\$25,087	\$6,378	\$34,536
New Jersey	27	50	242	259	578
Region	\$3,950	\$7,541	\$29,131	\$39,911	\$80,533
State of	10	19	118	50	197
Delaware Region	\$354	\$1,989	\$13,894	\$5,463	\$21,700
TOTAL	103	279	1,489	906	2,777
	\$9,533	\$30,112	\$146,495	\$115,113	\$301,253

Table 18 Farm Lending Activity by Region - 1996					
		Co	ensus Tract In	come	
Number	Low	Moderate	Middle	Upper	Total
Amount (000's)	Low	Moderate		Opper	
Philadelphia Metropolitan	0	1	22	7	30
Region	\$0	\$50	\$1,757	\$1,173	\$2,980
Pennsylvania Susquehanna	0	2	73	18	93
Region	\$0	\$36	\$404,998	\$2,044	\$407,078
Pennsylvania Northeastern	0	1	7	0	8
Region	\$0	\$310	\$481	\$0	\$791
Pennsylvania	0	1	169	3	173
Keystone Region	\$0	\$60	\$12,955	\$78	\$13,093
New Jersey	0	0	0	0	0
Region	\$0	\$0	\$0	\$0	\$0
State of	0	0	2	1	3
Delaware Region	\$0	\$0	\$36	\$10	\$46
TOTAL	0	5	273	29	307
	\$0	\$456	\$420,227	\$3,305	\$423,988

<u>Assessment Factor G</u> - The institution's record of opening and closing offices and providing services at offices.

## • Branches are reasonably accessible to all segments of the banks delineated community .

The branch network is comprised of 569 offices located throughout Central and Southern New Jersey, Eastern and Central Pennsylvania, and Delaware. Ten branches are housed in supermarkets. A full array of banking services is generally available at all branch locations. Most branches offer extended weekday hours and Saturday operations. The bank also has a network of 809 automatic teller machines.

During the evaluation period, the bank closed 115 branches within its delineated community. Thirteen percent of the branch closing were located in LMI neighborhoods. The majority of closures (88), were related to the CoreStates acquisition of Meridian Bank. A comprehensive analysis of the branch network was conducted to facilitate management's efforts to eliminate inefficient and under utilized locations.

When closing a branch, CoreStates is guided by a corporate branch closing policy which conforms to regulatory requirements. The impact of a branch closing, consolidation or reduction in service on customers is considered, and alternative methods to lessen any adverse effects are implemented when appropriate. A review of any projected branch closing is performed by the CRA Officer to determine the impact, if any on the affected community, especially if the closing impacts a LMI community. Most of the LMI branch closings occurred due the existence of multiple offices serving the same marketplace that resulted from merger activity. None of the LMI branch closing changed the assessment area or left the community without banking services.

The CoreStates Web Site on the Internet contains information on products and services, as well as guides and tutorials for prospective borrowers. The website can be accessed not only from home personal computers but also from several public libraries where the bank sponsors a community kiosk at the Free Library. Information about other alternative delivery systems, PC Banking and Telephone Banking Services can be obtained from the Web.

#### IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

**Assessment Factor D** - Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement(s).

• CoreStates aggressively solicits credit applications from all segments of its delineated community.

A comprehensive fair lending examination was performed that targeted HMDA reportable home improvement lending. The review did not disclose any indication of practices or activities that would discourage or prescreen applicants on a prohibited basis. Internal reporting systems adequately provide an ongoing analysis of loan application patterns. Management's commitment to compliance with fair lending laws and regulations is readily apparent in all stages of the lending process.

**Assessment Factor F** - Evidence of prohibited discriminatory or other illegal credit practices.

• There was no evidence of discriminatory or other illegal credit practices uncovered during the examination.

The results of the concurrent fair lending examination and prior compliance examination conducted in 1996 indicated that CoreStates was in compliance with all antidiscrimination laws and regulations. The importance of compliance with these laws is reinforced in all stages of the credit application process. Systems provide built in control mechanisms that assure equal treatment of all applicants. Policy and procedures are non-discriminatory in nature and continually reviewed to ensure such. Employees are regularly trained in fair lending concepts.

#### V. COMMUNITY DEVELOPMENT

**Assessment Factor H** - The institution's participation, including investments, in local community development and redevelopment projects or programs.

#### • CBNA effectively meets the community development needs of its communities.

CBNA's Corporate Community Development department's primary task is to ascertain and attempt to meet the needs of LMI areas within the delineated communities. CCD consists of the Community Development Real Estate Lending, Community Development Business Lending, CoreStates Community Development Corporation (a non-profit subsidiary of the bank), and Corporate Contributions and Outreach units. Through the cooperation of CCD, senior management, local governments and community/neighborhood groups, CBNA significantly contributed to the improvement of the quality of life in many LMI areas. The following table shows the number and dollar volume of loans made for LMI housing and economic development projects since August 1, 1995. These figures include financing for nearly 450 LMI housing units within the delineated communities.

Community Development Lending by CCD Real Estate Lending Unit and CoreStates Community Development Corporation Since August 1, 1995				
Region	Number of Loans	Dollars Outstanding		
Metropolitan	24	\$9,567,857		
New Jersey	8	\$1,255,860		
Delaware	1	\$53,000		
Keystone	1	\$40,000		
Susquehanna	1	\$395,000		
Northeast	1	\$114,000		
CoreStates CDC	4	\$310,000		
Total	40	\$11,736,217		

Five of the loans included in the above table are bridge loans established in support of Low Income Housing Tax Credit Investments. Tax credit investments are generally in the form of a ninety-nine percent equity investment in a limited partnership formed to own and operate LMI housing projects. In return for the equity investment, the bank receives tax credits against federal corporate income tax obligations.

The bridge loans supporting these investments are a tool used by management to maximize their equity investment at their target rate of return. A bridge loan allows the bank to make annual equity injections over a period of three to eight years, thus investing most of their moneys after benefits have started flowing from the projects. This formula produces a higher rate of return on the investment and/or allows the bank a larger equity investment at their target rate of return. The following table shows the current low income housing tax portfolio, with total equity commitments and LMI housing units supported.

Low Income Housing Tax Credit Investments Closed 1995 through March 1997					
Project	Region	Dollar Investment	Housing Units Funded		
American House Ltd.	Susquehanna	\$715,000	16		
Madison St. Investments Ltd.	Metropolitan	\$1,456,496	21		
Rowan House	Metropolitan	\$2,400,000	26		
Model Homes	Metropolitan	\$2,200,000	32		
Humboldt Suites	New Jersey	\$655,000	19		
Total		\$7,426,496	114		

Included in the outstanding balances previously discussed in <u>Assessment Factor I</u> are other loans made through the CCD Business Lending unit. This unit works exclusively with borrowers in LMI neighborhoods and census tracts. Credit needs of small business, religious groups, non-profit and community development corporations are all served by this unit. Included in the small business loan totals in <u>Assessment Factor I</u> are 210 loans representing \$15,179,157 in outstanding balances made by the unit to LMI borrowers since August 1, 1995. These loans help support businesses that provide over 1,000 jobs in LMI communities. The following table shows the distribution of CCD Business Lending by market region.

Small Business/Community Development Lending by CCD Business Lending Unit Since August 1, 1995.					
Region	Number of Loans	Dollars Outstanding			
Metropolitan	122	\$9,079,185			
New Jersey	28	\$2,056,084			
Delaware	21	\$1,256,770			
Keystone	7	\$846,508			
Susquehanna	8	\$196,096			
Northeast	24	\$1,744,514			
Total	210	\$15,179,157			

The following table shows examples of several types of programs in which CBNA is involved.

Loans Subsidized or Guaranteed through Local Government Programs					
Program	(#) 1995	(#) 1996	(\$) 1995	(#) 1996	
Penna Capital Access Program	9	8	\$798,000	\$798,000	
Del. Capital Access Program	10	10	\$568,700	\$703,529	
Phila. Comm. Dev. Corp.	5	1	\$590,000	\$28,000	
Phila. Industrial Dev. Corp	2	4	\$969,000	\$1,785,000	
Phila. Small Business Micro Loan	9	13	\$54,000	\$62,000	
Women's Opportunity Resource Center	1	2	\$5,000	\$12,000	
Econ. Development Auth (NJ) *	10	9	\$828,875	\$601,500	

\* Of the nineteen loans made in 1995 and 1996, five are letters of credit with zero outstanding balances. These letters are being used as credit enhancement features on bonds sold to finance the various projects.

Many of the above programs and loan funds utilize grants, subsidies, or guarantees from government and private sources in support of the bank's financing. This list is not all inclusive . Samples of other programs that CBNA takes part in are the Lehigh Valley Loan Pool, Minority Business Finance Corporation, Scranton Neighborhood Housing Services, and the Capital Region Lender Coalition, among others. These loans have been included in the totals discussed in Assessment Factor I.

The CoreStates Community Development Corporation (CCDC) is a non-profit subsidiary of CBNA, focusing on community development projects and plans in LMI neighborhoods. Most of CCDC's funding has been for pre-development expenses associated with community development projects. CCDC's role has been limited in the past several years for a number of reasons including a relatively low capitalization level of \$1.1 million. In May 1997, senior management approved an increase in the capital level to its maximum of \$5.0 million.

**Assessment Factor K** - The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions and other factors.

• CBNA continually demonstrates the ability to be a leader in meeting community credit needs while effectively utilizing its size and financial resources.

CBNA's programs focus on social and economic issues of its local communities. The bank is not precluded from meeting credit needs through any legal, financial or economic impediments. Despite the increase in geographies through the Meridian merger, CBNA possesses the capacity to serve these areas. Please refer to the <u>Bank and Community Profile</u> sections of this evaluation for more information.

Assessment Factor L - Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.

• CBNA actively engages in other activities to help meet the credit needs of its communities through contributions and investments..

#### Financial Grants/Contributions

CBNA remains the leading financial contributor within its community. For 1996, approximately 65% or \$3.2 million of total CRA-related contributions were made through the Corporate Community Development Grant Unit on behalf of CBNA, with the remaining 35% or \$1.7 million funded through the bank's regional business units. These contributions supported numerous qualified community development organizations and educational initiatives throughout CBNA's assessment area. The following table shows a breakdown of contributions by regional area.

1996 Contributions*				
	\$Amount	% Total		
Pennsylvania Regions:				
Metro	524,800	30%		
Suburban	272,850	16%		
Central Northern	88,200	5%		
Susquehanna	74,575	4%		
Northeast	67,775	4%		
Keystone	80,684	5%		
New Jersey Region	586,391	34%		
Delaware Region	28,040	2%		
TOTAL	1,723,315	100%		

Excludes corporate grants

CBNA actively supports agricultural events and educational programs for the farming community. In February 1997, CBNA held its annual Agri-Education Seminar at a cost of approximately \$30 thousand. This seminar includes topics on financial matters relevant to the farming industry.

#### **Investments - Housing Authority Bonds as of March 1997**

Due to changes in the tax laws and large number of recent maturities, management has decreased its investment I Pennsylvania Housing Bonds. The current volume of housing related securities are as follows:

Pennsylvania Housing Bonds
New Jersey Housing Bonds
Delaware Housing Bonds
\$1,860,000
\$1,791,450
\$13,258,000

The above securities represent approximately 6% of the total state issued securities of Pennsylvania, New jersey and Delaware held by CBNA.

#### **Special Loan Program - Consumer Lending**

CBNA offers a secured and unsecured LMI consumer loan. This product was first offered in 1996, replacing similar products offered by the individual merged banks. Current outstandings for these products are:

PRODUCT	ACCOUNTS	\$ VOLUME
Secured Product	247	\$1,533,000
Unsecured Product	792	\$2,215,000

**Community Development Services** 

CBNA actively provides community development services to help meet the needs of the delineated community. The following discusses some activities in which the bank leads or participates in to help meet the needs of the delineated community. Additional information was also provided under Assessment Factor A.

#### Philadelphia Metropolitan/Suburban Market Region

- CoreStates has an alliance with the Delaware Valley Community Reinvestment Fund to
  design and implement development projects centered around affordable housing,
  commercial real estate and community-based businesses in low-income neighborhoods
  throughout the Delaware Valley.
- CBNA has partnered with various foundations to form the Bucks County Funders Initiative. This group was developed to provide financial operating support and technical assistance to affordable housing organizations in Bucks County.

#### **Delaware Market Region**

• CBNA provides technical assistance and in-kind services to the YWCA of New Castle County, Delaware. This organization provides pre-purchase affordable housing counseling in five community centers located throughout the city of Wilmington.

#### **Keystone Market Region**

- In Lancaster, Pa, CoreStates participates in the Livable Communities Work Group to develop approximately 200 residential units of various types and price ranges as well as neighborhood-based retail/commercial services.
- Representatives of CBNA are involved on the board of the Spanish Speaking Council of Reading and Berks Counties. CoreStates employees provide essential technical assistance and financial consulting services needed to stimulate economic development.

#### Susquehanna Market Region

• Employees of the bank assisted in the development of a community profile for the Williamsport area and identified new markets previously affiliated with other financial institutions.

#### **New Jersey Market Region**

• Representatives from CBNA are actively involved in the New Jersey Home Buyer's Counseling Coalition. This group co-sponsors seminars to educate potential home buyers about the home buying process.