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Comptroller of the Currency  
Administrator of National Banks

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## **Public Disclosure**

**October 17, 1997**

### **Community Reinvestment Act Performance Evaluation**

**Bank of Lancaster County, N.A.  
Charter Number: 42**

**North Pointe Banking Center  
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Lancaster, Pennsylvania 17601-4133**

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**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

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **Bank of Lancaster County, N.A.** prepared by the **Office Of the Comptroller of the Currency**, the institution's supervisory agency, as of **October 17, 1997**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.

**Institution's CRA Rating:** This institution is rated Satisfactory based upon the following factors:

- Lending levels reflect a good responsiveness to the credit needs within the assessment area.
- A substantial majority of loan originations are in the assessment area.
- There is good penetration of loans among borrowers of different income levels.
- The geographic distribution of loans reflects reasonable penetration throughout the assessment area.
- There is an adequate level of community development lending activity.
- There is an adequate level of qualified investments
- Service delivery systems are accessible to individuals and geographies of different income levels and there is an adequate level of community development services.

The following table indicates the performance level of **Bank of Lancaster County, N.A.** with respect to the lending, investment, and service tests.

Performance Levels	Name of Financial Institution Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High satisfactory	X		
Low satisfactory		X	X
Needs to improve			
Substantial noncompliance			

\* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

## Scope of Review

The bank's previous CRA Performance Evaluation is dated October 25, 1995. This evaluation addresses the bank's performance from January 1, 1996 through September 30, 1997. Home Mortgage Disclosure Act (HMDA) related data (1996 and YTD 9/15/97), small business and small farm (1996 only), consumer (1996 only), and community development loans originated during the review period were evaluated. The bank requested we evaluate consumer lending activities for 1996.

## Description of Institution

The Bank of Lancaster County, N.A. (BLC) is a wholly owned subsidiary of the Sterling Financial Corporation, a one bank holding company. BLC is engaged in the business of commercial, retail, and trust banking. The bank also offers leasing services through its subsidiary Town and Country, Inc., and discount brokerage services through an arrangement with Tradestar Investments, Inc. As of June 30, 1997, BLC reported total assets of \$792 million including loans of \$494 million, investments of \$183 million and deposits totaling \$667 million. A review of the loan mix at this date reflects first lien mortgages at 10%, commercial loans at 65%, and consumer loans at 26%.

BLC operates 29 branch locations throughout its assessment area. The branch network is comprised of twenty-four full-service locations, and five limited service offices. Four of the limited-service offices are located within several local retirement developments and one functions

as a walk-up/drive-thru facility. Seventeen of the branch locations offer Automated Teller Machine (ATM) access. The Administration Services Building (operations center) is also equipped with an ATM. There are no legal or financial impediments which would hinder the bank's ability to help meet the credit needs of its community. BLC continues to compete with larger regional banking institutions as well as peer sized banks, and local saving and loans.

## **Description of Assessment Area (AA)**

BLC designates its assessment area as the Lancaster County Metropolitan Statistical Area (MSA 4000) and a very small portion of western Chester County (MSA 6160). In total, the AA is comprised of 101 census tracts. The AA contains 2 low-income census tracts (2%), 11 moderate-income census tracts (11%), 81 middle-income census tracts (80%) and 7 upper-income census tracts (7%). The AA meets regulatory guidelines and does not arbitrarily exclude any low- and moderate- income (LMI) areas.

Based upon 1990 Census Data, BLC's AA has a population of 436,076 which includes total families of 116,619. The median family income for the AA is \$38,076 with the HUD adjusted median family income of \$45,437. Housing units total 161,195 of which 83% are 1-4 family units. Owner occupied housing and rental occupied units represent 67% and 29% respectively, of the AA's total housing units.

The economy of the AA is stable with a diverse employment base. Business interests within the region include retail, tourism, agriculture, manufacturing and service industries. Major employers include Armstrong World Industries, Lancaster General Hospital, and R.R. Donnelly and Son. The unemployment rate for the AA is 2%.

Management has indicated that affordable 1- 4 family housing and flexible (underwriting) mortgage products are the primary credit needs of its AA. Our review of community outreach previously conducted within the bank's AA supports the community's credit needs assessment made by management.

## Conclusions with Respect to Performance Tests

### Lending Test

#### Lending Activity

BLC originates the vast majority of its loans within its designated AA. The following tables provide a breakdown of HMDA related loan data for the review period and business and farm loan activity for 1996. During 1996, an average of 97% of the number and dollar amounts of HMDA related, small business and small farm originations were within the AA. The bank's performance for 1997 based only on HMDA related loan activity reflects 95% of the number, and 94% of the dollar amounts of originations are within the AA. In addition, the bank ranks number one in HMDA lending within the assessment area with 1,458 HMDA originations in 1996, and has the highest market share at 10.37%.

<b>Ratio of HMDA, Business and Farm Loans Within the Assessment Area - 1996</b>				
# Loans	HMDA Loans	Business Loans	Farm Loans	Total
Loans in AA	1,458	664	280	2,402
Total Loans	1,504	673	298	2,475
% Loan in AA	96.9%	98.7%	94%	97.1
(\$000)				
\$ Amt in AA	\$71,373	\$39,445	\$13,755	\$124,573
Total \$ of Loans	\$73,780	\$39,554	\$14,624	\$127,958
% \$ Amt in AA	96.7%	99.7%	94.1%	97.4%

<b>Ratio of HMDA, Business and Farm Loans Within the Assessment Area - January 1, 1997 - September 15, 1997</b>				
# Loans	HMDA Loans	Business Loans	Farm Loans	Total
Loans in AA	735	*	*	735
Total Loans	776	*	*	776
% Loan in AA	94.7%	*	*	94.7
(\$000)				
\$ Amt in AA	\$38,988	*	*	\$38,988
Total \$ of Loans	\$41,581	*	*	\$41,581
% \$ Amt in AA	93.8%	*	*	93.8%

\* Interim data not available from management

BLC's loan-to-deposit (LTD) ratio averaged 73% over the prior eight quarter period compared to the national peer group average of 75% and 75% for a group of local peer banks. BLC sells the majority of its mortgages in the secondary market which impacts its LTD ratio. The volume sold during the review period was approximately \$27.7 million for 1996 and \$27.3 million YTD 9/30/97.

### **Geographic Distribution of HMDA, Small Business, and Small Farm Loans**

BLC's loan originations reflect reasonable penetration throughout its AA. The AA is comprised of 2% low-income, 11% moderate-income, 80% middle-income and 7% upper-income census tracts. Based upon HMDA data, loan originations for the review period were distributed in the following census tracts: 1% low-income, 6% moderate-income, 85% middle-income and 8% upper-income. For consumer loans, loan originations for the review period were distributed in the following census tracts: .4% low-income, 4% moderate-income, 72% middle-income, and 6% upper income (information not available for 17%). This distribution reasonably approximates the proportion of census tracts in the AA along income levels. In addition, the bank ranks first in lender market share in moderate income CTs with 10.64% of the market. The bank ranks second in lender market share in low-income CTs with 9.68% of the market. In loans to low-income CTs, the bank ranks second in market share behind a much larger institution.

Based upon 1996 data, the distribution of small business and small farm loans reasonably approximates the proportion of census tracts within the AA along income levels. The distribution of small business and small farm originations for 1996 is 0% low-income, 6% moderate-income, 85% middle-income and 9% upper-income.

## Borrower Characteristics

BLC's lending patterns reflect reasonable distribution among borrowers of different income levels. HMDA and consumer loan originations by income level are presented below. The tables also present data on the percentage of families in the bank's AA that are low- moderate- middle- and upper-income.

HMDA Loans	Low		Moderate		Middle		Upper		NA	
	#	%	#	%	#	%	#	%	#	%
1996	92	6	274	19	440	30	624	43	28	2
1997	57	8	106	14	204	28	341	46	27	4
Total Families	15%		19%		29%		37%			

NA: Income Not Available

Consumer Loans	Low		Moderate		Middle		Upper		NA	
	#	%	#	%	#	%	#	%	#	%
1996	675	15	905	20	1,087	24	1,037	23	757	17
1997	*	*	*	*	*	*	*	*	*	*
Total Families	15%		19%		29%		37%			

\* Data Not Available

NA: Income Not Available

Total HMDA & Consumer Loans	Low		Moderate		Middle		Upper		NA	
	#	%	#	%	#	%	#	%	#	%
1996	767	13%	1,179	20%	1,527	26%	1,661	28%	785	13%
1997	*	*	*	*	*	*	*	*	*	*
Total Families	15%		19%		29%		37%			

\* Data Not Available  
NA: Income Not Available

The tables above indicate good penetration of loans to borrowers of different income levels within its AA. While HMDA loans to low-income borrowers are below the percentage of low-income families within the AA, the percentage has increased from 1996 to September 15, 1997. Consumer loan originations in 1996 to low- and moderate-income borrowers virtually equates to the percentage of low and moderate-income families within the AA.

Additionally, within their AA, the bank ranks first for lender market share in HMDA loans originated to moderate-income borrowers with an 8.51% market share. The bank ranks third for lender market share in HMDA loans originated to low-income borrowers with a 9.96% market share within their AA. In loans to low-income borrowers, the bank is ranked third behind two much larger institutions. Overall performance reflects management's positive efforts regarding lending to low- and moderate-income borrowers.

### Small Business lending

The distribution of small business and small farm loans based on borrower characteristics is reasonable. As the table that follows indicates, the substantial majority of the small business and small farm loans originated during 1996 were to businesses with revenue \$1 million or less. Additionally, 88% of the loans to small businesses and small farms with revenues of \$1 million or less were originated in amounts of \$100,000 or less.

Loans to Small Businesses and Small Farms with Revenues \$1 Million or Less - 1996*				
Type of Loan	#	% of Total	\$(000)	% of Total
Small Business	555	84	\$26,468	67
Small Farms	273	98	\$12,936	88

\* Interim 1997 data not available from management



The average loan origination to small businesses or small farms within the AA is approximately \$47,200. Based upon our analysis of the 1996 Small Business and Small Farm Collection Register, BLC's distribution of loans to small businesses and farms is reasonable. As the table below reflects, approximately 87% of the small business and small farm loans originated were in amounts less than \$100,000. This performance supports BLC's efforts to serve small businesses in their AA.

Original Loan Amounts	Business Loans*		Farm loans*		Total	
	#	\$(000's)	#	\$(000's)	#	\$(000's)
Less than \$100,000	570	15,112	241	5,195	811	20,307
\$100,000 to \$250,000	68	11,249	27	4,495	95	15,744
Greater than \$250,000	26	13,084	12	4,065	38	17,149
Total	664	39,445	280	13,755	944	53,200

\*interim data not available from management

### **Community Development Lending**

During the review period, the bank originated four (4) small business loans totaling \$1.1 million that qualify as community development loans. The purpose of these loans are as follows: one loan to an economic development corporation to provide financing to renovate office space for use by small start-up businesses; development costs for a 98-unit townhouse project to be sold to first time LMI home buyers; and, funding to furnish a health center located in the low-income area of the City of Lancaster. These three loans also provide employment to the assessment area. Additionally, a short term loan of \$140,000 was made to fund the sewer costs of an apartment complex that will be rented to LMI families. And, two loans were made to an investor for the purchase of housing in the low-income CTs within the City of Lancaster. All of the identified loans are \$1 million or less and benefit low-income and moderate-income individuals.

### **Innovative or Flexible Lending Practices**

BLC uses innovative and flexible lending practices in order to serve the credit needs of its AA. They are involved in several programs designed internally and externally to support home ownership. Two first time buyer programs are available to the bank's customers. The BLC designed program for first time low- and moderate-income (LMI) home buyers allows financing up to 100% of the purchase price. Closing costs are also lowered by waiving private mortgage insurance and loan fees. Thirty-nine of these loans totaling \$ 2,109,250 were made since the prior CRA evaluation. However, this program was essentially discontinued during August of 1996 when the bank reached their self-imposed \$5MM limit for this program.

BLC also committed to provide mortgage financing to LMI borrowers purchasing eight homes developed in the City of Lancaster. Each mortgage will be approximately \$46,500. BLC will advance 97% of the purchase price. No points are charged and no private mortgage insurance is required. As of June 30, 1997, two loans have closed totaling \$93,900. The mortgage loans originated above have been reported as HMDA loans.

BLC also participates in three Freddie Mac Affordable loan programs that use flexible underwriting standards. Three loans totaling \$174,570 have been extended under these programs. Other flexible loan products include reverse mortgages (3 loans, \$387,500), subprime mortgages (2 loans, \$135,000) and the recent introduction of the Guaranteed Rural Housing Program (up to 100% financing, guaranteed by FMHA and sold to FHLMC).

### **Investment Test**

Overall, BLC is investing in its AA in a reasonable manner. The dollar amount of qualified community investments and grants totals are as follows:

1) Equity Investments:	\$1,104,394
2) Community grants or donations:	\$ 59,200
3) Community First Fund	<u>\$ 25,000</u>
Total	\$1,188,594

BLC is providing equity investments for the projects that follow:

- 1) \$307,496 investment for a \$5 million project to finance 66 rental units for low-income individuals.  
  
\$458,100 investment for a \$7 million project to convert a five story building into an 83-unit apartment building. Seventy-seven or 92% of these units will be reserved for low-income individuals or families.  
  
\$221,295 investment for a \$1.7 million project to build a 56 unit townhouse project for low income families in Quarryville, PA.  
  
\$117,503 investment for a \$3.2 million project to convert existing property into 60 low-income rental units.
- 2) The amount reflected above represents various contributions to social services, economic development, affordable housing and other organizations supporting activities essential to LMI individuals or geographies.
- 3) The Community First Fund is designed to fund and support economic development via small loans, business training and mentoring services to LMI individuals and businesses located within low-and moderate-income areas.

## **Service Test**

### **Retail Banking Services**

The Bank's delivery systems are reasonably accessible to all portions of the Bank's AA. During the review period, four branches were opened and no offices were closed. All of the branch openings were within middle-income census tract locations. Only one of the recent branch openings is full service, as two of these branches are located in local retirement communities and one office is designed to operate primarily as a LPO.

Twenty-four of BLC's branches are located in middle-income census tracts, with two branches located in moderate-income census tracts and three in upper-income census tracts. There are no branches located within the two low-income census tracts of the AA, however, these areas border the census tract location of two full service branch offices.

Office hours meet the convenience and needs of the community and include extended weekday and Saturday hours. All offices have extended hours on Thursday and Fridays. Most offices are open on Saturday from 9 a.m. to 12 p.m.

Alternative systems for delivering retail banking services include bank by phone (deposit account rates, balances activation, and loan applications), bank by mail, a website on the Internet, and automated teller machines.

### **Community Development Services**

BLC provides an adequate level of community development services. Management and staff maintain memberships and provide technical/management expertise to various charitable, affordable housing and social service organizations within the AA. Examples of these organizations include Lancaster Housing Opportunity Partnership, TABOR Community Services, and Susquehanna Valley Community Loan Fund. In addition, credit counseling services are available to all customers.

## **Compliance with Antidiscrimination Laws**

Our concurrent fair lending examination did not detect any evidence of discriminatory or other illegal credit practices.

## **Metropolitan Statistical Areas**

### **Conclusions with Respect to Performance Tests in Lancaster MSA (4000)**

The Lancaster MSA represents approximately 94% of the census tracts in the BLC's AA. The bank's performance in helping to meet the credit needs of the Lancaster MSA is consistent with the bank's overall performance.

### **Description of Institution's Operation in MSA 4000**

BLC operates 28 of its 29 banking offices within this portion of its AA. All of these offices are full service except for the four branches located within retirement community settings and the Elizabethtown office which opened primarily as a LPO. BLC's focus within this MSA is affordable housing and small business lending.

### **Description of Lancaster MSA 4000**

The Lancaster MSA contains 94 census tracts broken out as follows: 2 low-income (2%), 11 moderate-income (12%), 74 middle-income (79%), and 7 upper-income (7%) census tracts. Based on 1990 census data the Lancaster MSA has a population of 422,822 which includes families of 112,965. The median family income averages \$37,791. Housing units total 156,462 of which 83% are 1-4 family units. Owner occupied housing is 66% of the total, and rental occupied housing 29%.

### **Conclusions with Respect to Performance Tests**

Lending activity within MSA 4000 represents approximately 99% of the total number and 98% of the total dollar amount of the HMDA related, and small business and small farm loans reviewed within the scope of this evaluation. The lending performance in this MSA is commensurate with the bank's overall performance.

### **Geographic Distribution**

The geographic dispersion of loans reflects reasonable penetration throughout MSA 4000. MSA 4000 is comprised of 94 census tracts reflecting the following characteristics: 2% low-income, 12% moderate-income, 79% middle-income and 7% upper-income. For the review period, approximately 1%, 6%, 84% and 9% of the HMDA related and small business and small farm loans originated during the review period were in the aforementioned census tracts, respectively. This distribution reflects reasonable penetration throughout the census tracts in the MSA along income levels.

## Borrower Characteristics

The bank's record of lending to borrowers of different income levels was evaluated using HMDA loans originated during the review period. As shown in the chart below, HMDA related originations by income level of the borrower are presented for the review period. The table also reflects data on the percentage of families in the AA by income levels.

HMDA	Low		Moderate		Middle		Upper		NA	
	#	%	#	%	#	%	#	%	#	%
1996	88	6	252	18	423	30	609	43	28	2
1997	57	8	103	14	204	28	333	46	27	4
Total Families	15%		19%		29%		37%			

The data above indicates good penetration of loans to borrowers of different income levels within the MSA. While loans to low-income borrowers are below the level of low-income families within the MSA, the percentage has increased 1996 to 1997. Lending to moderate-, middle- and upper-income borrowers is reasonable and approximates the percentage of similar income families within the MSA.

## Small Business Lending

The distribution of small business and small farms based on borrower characteristics is reasonable. BLC originated 971 small business and small farm loans during 1996. Nine Hundred and Fourteen (647 small business and 267 small farms) or 94% of these loans were originated in MSA 4000. As the chart below indicates, the majority of loans originated in MSA 4000 were to businesses with revenue of less than \$1 million. Our review also indicates that 88% of the loans extended to businesses or farms with revenues less than \$1 million originated in amount of \$100,000 or less.

MSA 4000- Small Businesses and Small Farms with Revenues < \$1 Million -1996*				
Type of Loan	#	% of Total	\$(000)	% of Total
Small Business	539	82	\$25,799	66
Small Farms	260	93	\$12,691	92

\* Interim 1997 data not available from management

Based upon our analysis of the 1996 Small Business and Small Farm Collection Register, BLC's distribution of loans to small businesses and farms is reasonable. As reflected below,

approximately 86% of the small business and small farm loan originations within MSA 4000 were in amounts less than \$100,000. This performance supports BLC's efforts to serve small businesses within MSA 4000.

Original Loan Amounts	Business Loans*		Farm loans*		Total	
	#	\$(000's)	#	\$(000's)	#	\$(000's)
Less than \$100,000	554	14,643	228	4,950	782	19,593
\$100,000 to \$250,000	67	10,999	27	4,495	94	15,494
Greater than \$250,000	26	13,082	12	4,065	38	17,147
Total	647	38,724	267	13,510	914	52,234

\*interim data not available from management

### **Community Development Lending**

Please refer to the overall assessment of Community Development Lending for details.

### **Investment Test**

BLC's investments are all located in MSA 4000. Please refer to the overall assessment of the Investment test for details.

### **Service Test**

#### **Retail services**

Four branches were opened in MSA 4000 during the review period improving the accessibility of service delivery with the AA. Twenty-eight of BLC's 29 offices are located in this MSA. Please refer to the overall Service Test assessment for details.

### **Community Development Services**

All of management and staff's involvement in community development activity is centered in MSA 4000. Lancaster County/MSA 4000 represents 94% of the AA and the comments under the overall Service Test performance relates solely to this portion of the AA.

## **Conclusions with Respect to Performance Tests in Philadelphia MSA (6160)**

The portion (7 census tracts) of BLC's AA outside of the Lancaster MSA lies in western Chester County. This area is part of the Philadelphia MSA 6160 and represents approximately 6% of the census tracts in BLC's AA. The bank performance in helping to meet the credit needs of the Philadelphia MSA is limited as the one banking location within this MSA is a walk-up/drive-thru facility and is considered an extension of the Christiana office (less than 2 miles) which is a full service branch office located in Lancaster County/MSA 4000.

### **Description of Institution's Operation in MSA 6160**

BLC operates 1 of its 29 banking offices within this portion of its AA. This location operates primarily as a walk-up/drive-thru facility. This location also contains space to facilitate loan application interviews.

### **Description of Philadelphia MSA 6160**

The portion of the Philadelphia MSA within the bank's AA contains 7 middle-income census tracts. Based on 1990 census data, this area has a population of 13,254 which includes families of 3,654. The median family income averages \$41,908. Housing units total 4,733 of which 86% are 1-4 family units. Owner occupied housing is 75% of the total, and rental occupied housing 20%.

### **Conclusions with Respect to Performance Tests**

Lending activity within MSA 6160 represents 1% of the total number and 2% of the total dollar amount originated during the review period. In total, 58 HMDA related, 17 small business and 13 small farm loans were originated in the portion of BLC's AA that lies in MSA 6160.

### **Geographic Distribution of Loans**

BLC's loans are reasonably distributed throughout the portion of its AA within MSA 6160. This portion of the bank's AA is entirely comprised of middle income census tracts (7). During the review period, 100% of the HMDA related and 90% of the small business and small farm originations were in middle-income census tracts within MSA 6160.

### **Borrower Characteristics**

The bank's record of lending to borrowers of different income levels was evaluated using HMDA data for the review period. As shown in the chart below, HMDA related originations by income level of the borrower are presented for the review period. The table also reflects data on the percentage of families in the AA by income levels.

HMDA	Low	Moderate	Middle	Upper
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	#	%	#	%	#	%	#	%
1996	4	7	22	38	17	29	15	26
1997	0	0	3	27	0	0	8	73
Total Families	14%		21%		30%		35%	

BLC's record of lending to borrowers of different income levels within this MSA is reasonable. The portion of BLC's AA that lies within MSA 6160 is small and as a result limited lending activity occurs. The one branch location in this MSA is a walk-up facility with lenders available as needed. The data above indicates that overall, BLC has made loans to borrowers with different income levels in this portion of its AA that is part of MSA 6160. While loans extended to the low-income borrowers is below the level of low-income families within this portion of its AA the distribution among moderate-, middle-, and upper-income borrowers is reasonable and approximates the percentage of similar income families within the MSA.

### Small Business Lending

The distribution of small business and small farm loans based on borrower characteristics is reasonable. BLC originated 17 small business and 13 small farms loans during 1996 in MSA 6160. As the chart below indicates, the majority of these loans were to businesses with revenues of less than \$1 million. All loans except one of the small business and small farm loans extended in MSA 6160 originated in amounts of \$100,000 or less.

MSA 6160- Small Businesses and Small Farms with Revenues < \$1 Million -1996*				
Type of Loan	#	% of Total	\$(000)	% of Total
Small Business	16	94	\$699	97
Small Farms	13	100	\$245	100

\* Interim 1997 data not available from management

Based upon our analysis of the 1996 Small Business and Small Farm Collection Register, BLC's distribution of loans to small businesses and farms is reasonable. As reflected below, approximately 97% of the small business and small farm loan originations within MSA 6160 were in amounts less than \$100,000.

Original Loan Amounts	Business Loans*	Farm loans*	Total
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	#	\$(000's)	#	\$(000's)	#	\$(000's)
Less than \$100,000	16	469	13	245	29	714
\$100,000 to \$250,000	1	250	0	0	1	250
Greater than \$250,000	0	0	0	0	0	0
Total	17	719	13	245	30	964

\*interim data not available from management

**Community Development Lending**

None of the loans originated within MSA 6160 qualify as community development.

**Investment Test**

There have been no community development investments or grants within this MSA.

**Service Test**

There has been no branching activity within the MSA during the review period. The walk-up/drive-thru facility is reasonably accessible to the portion of the bank’s AA located in MSA 6160. Office hours meet the convenience and needs of the community with extended weekday hours.

**Community Development Services**

None identified through management discussion or the review of bank records.