



2024 CRA PUBLIC FILE



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BOOK 1 of 3

PUBLIC DISCLOSURE

November 6, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Firsttrust Savings Bank
Certificate Number: 26647

15 East Ridge Pike
Conshohocken, Pennsylvania 19428

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
New York Regional Office

350 Fifth Avenue, Suite 1200
New York, New York 10118

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 safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			
<i>* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.</i>			

The Lending Test is rated Low Satisfactory.

- Lending levels reflect adequate responsiveness to assessment area credit needs.
- An adequate percentage of loans are made within the bank's assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different size.
- The bank exhibits an adequate record of serving the credit needs of the most economically disadvantaged areas of its assessment areas, low-income individuals, and/or small businesses, consistent with safe and sound banking practices.
- The bank uses innovative and/or flexible lending practices in order to serve its assessment areas' credit needs.
- The institution has made an adequate level of community development loans.

The Investment Test is rated Low Satisfactory.

- The bank has an adequate level of qualified community development investments and grants, although rarely in a leadership position.

- The bank exhibits good responsiveness to credit and community economic development needs.
- The bank rarely uses innovative and/or complex investments to support community development initiatives.

The Service Test is rated Low Satisfactory.

- Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas.
- The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- The bank's business hours and services do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- The bank provides an adequate level of community development services.

/DESCRIPTION OF INSTITUTION

Background

Firstrust Savings Bank (Firstrust) is a commercial bank headquartered in Conshohocken, Pennsylvania (PA). The bank is a wholly owned subsidiary of Semperverde Holding Company, also headquartered in Conshohocken, PA. Firstrust has several subsidiaries including Hatch Bank, APEX Commercial Capital, and Firstrust Financial Resources. Firstrust received an overall CRA rating of “Satisfactory” at the previous FDIC Performance Evaluation, dated November 2, 2020, based on Interagency Large Institution Examination Procedures.

Operations

Firstrust operates 18 full-service branch offices in PA, New Jersey (NJ), and Maryland (MD). Since the prior evaluation, the bank closed one branch office, located in a middle-income census tract, in Montgomery County, PA. There was no merger or acquisition activity during the evaluation period. There are 16 branches in PA, located in Bucks (3), Lehigh (1), Montgomery (7), and Philadelphia (5) Counties. Firstrust has one branch in Camden County, NJ and one branch in Baltimore County, MD. Based on 2020 Census data, all branches are located in middle- and upper-income census tracts. Firstrust offers a variety of consumer and commercial loan products, in addition to consumer and commercial deposit products. Consumer loan products offered include home mortgage loans, home equity loans and lines of credit, and consumer credit cards. Commercial loan products offered include commercial mortgages, investment real estate lines of credit, commercial term loans and lines of credit, equipment financing, United States (U.S.) Small Business Administration (SBA) loans, and business credit cards. Deposit products include personal and business checking and savings accounts, certificates of deposit (CDs), and individual retirement accounts (IRAs). Firstrust’s alternative banking services include online and mobile banking, electronic bill pay, mobile pay, and automated teller machines (ATMs) at each branch office.

Ability and Capacity

Bank assets totaled \$5.1 billion as of September 30, 2023, which included total loans of \$4.3 billion and securities totaling \$407.7 million. Bank deposits totaled \$3.9 billion. Since the prior evaluation, total assets, loans, and deposits increased by 8.8 percent, 14.1 percent, and 13.8 percent, respectively. The increase in total assets, loans, and deposits since the prior evaluation is due to normal business growth. The following table illustrates the loan portfolio composition as of September 30, 2023.

Loan Portfolio Distribution as of 09/30/2023		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	418,339	9.8
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	891,602	20.9
Secured by Multifamily (5 or more) Residential Properties	88,681	2.1
Secured by Nonfarm Nonresidential Properties	1,252,280	29.3
Total Real Estate Loans	2,650,902	62.1
Commercial and Industrial Loans	1,076,327	25.2
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	383,220	9.0
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	148	0.0
Lease Financing Receivable (net of unearned income)	157,230	3.7
Less: Unearned Income	0	0.0
Total Loans	4,267,827	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal or other impediments that affect the bank's ability to meet assessment areas credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The Community Reinvestment Act (CRA) requires each financial institution to define one or more assessment areas within which its supervisory agency will evaluate its CRA performance. Firsttrust designates the following three assessment areas, each being a separate rated area.

- **Philadelphia-Camden-Wilmington, PA-NJ-Delaware (DE)-Maryland (MD) Metropolitan Statistical Area (Philadelphia, PA-NJ Multistate MSA):** This assessment area includes Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties in PA, and Camden County in NJ. Bucks, Chester, and Montgomery Counties are in the Montgomery County-Bucks County-Chester County, PA Metropolitan Division #33874. Delaware and Philadelphia Counties are in the Philadelphia, PA Metropolitan Division #37964. Camden County is in the Camden, NJ Metropolitan Division #15804. The three metropolitan divisions are part of the larger Philadelphia-Camden-Wilmington, PA-NJ-DE-MD multistate MSA.
- **Lehigh County, PA:** This assessment area includes Lehigh County, PA, in the Allentown-Bethlehem-Easton, PA-NJ MSA #10900.
- **Towson, MD:** This assessment area includes the census tracts that comprise Towson, MD (District 9) within Baltimore County. Baltimore County is in the Baltimore-Columbia-Towson, MD MSA #12580. The bank expanded its overall assessment area to include this assessment area with the opening of its Towson branch office in August 2020.

Collectively, examiners refer to these three assessment areas as the combined assessment area. For a description of the individual assessment areas, please refer to each rated area included in later sections.

Economic Data

During the evaluation period, the unemployment rates within the combined assessment area varied from a high of 11.6 percent in Philadelphia County (December 2020) to a low of 1.7 percent in Baltimore County (June 2023). In 2020, the COVID-19 pandemic resulted in heightened unemployment rates; however, the high rates recovered during the latter part of the evaluation period. The following table summarizes unemployment data from the Bureau of Labor Statistics at county, state, and national levels.

Unemployment Rates				
Area	2020	2021	2022	YTD 2023
	%	%	%	%
Baltimore County	6.2	3.2	2.6	1.8
Bucks County	6.4	3.2	3.3	3.3
Camden County	7.1	5.4	3.5	5.2
Chester County	5.1	2.6	2.7	2.9
Delaware County	7.8	3.6	3.5	3.5
Lehigh County	8.1	3.8	3.8	4.0
Montgomery County	6.1	3.0	3.0	3.1
Philadelphia County	11.6	5.0	4.6	4.7
MD Statewide	6.3	3.2	2.5	1.7
NJ Statewide	6.8	5.0	3.1	4.7
PA Statewide	7.9	3.8	3.8	3.8
Nationwide	6.7	3.9	3.5	3.5

Source: Bureau of Labor Statistics (Year End). YTD 2023 figures are as of July 2023

Please refer to the individual assessment area sections for additional demographics on each assessment area.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation, dated November 2, 2020, to the current evaluation, dated November 6, 2023. Examiners used the FFIEC Large Institution Examination Procedures to evaluate the bank's CRA performance. These procedures include the Lending Test, Investment Test, and Service Test. Please see the Appendices for complete description of these tests.

Examiners conducted a full-scope review of the bank's performance in each of its assessment areas. In some instances, examiners gave more weight to the Philadelphia PA-NJ Multistate MSA assessment area when determining the overall rating, as this area accounted for a significant majority of the bank's loans, deposits, and branch offices.

Activities Reviewed

Examiners determined that Firsttrust's major product lines are home mortgage and small business loans. This conclusion considered the bank's business strategy, as well as the number and dollar volume of loans originated during the evaluation period. While the volume of small business loan originations was similar to that of home mortgage during 2020 and 2021, examiners gave greater weight to home mortgage lending when forming overall conclusions. This is because a significant volume of small business loans originated in 2020 and 2021 were Paycheck Protection Program (PPP) loans, which was a short-term loan product offered through, and forgiven by, the SBA in response to the COVID-19 pandemic. At the bank's request, examiners analyzed other real estate secured loans. These loans have a business purpose, but residential mortgages secure the loan. The bank did not originate any small farm loans during the review period. No other loan types, such as consumer loans, represent a major product line.

Examiners reviewed home mortgage loans reported on the bank's 2020, 2021, and 2022 Home Mortgage Disclosure Act (HMDA) loan application registers (LARs). Firsttrust originated 2,551 loans totaling \$788.2 million in 2020, 1,584 loans totaling \$575.4 million in 2021, and 1,221 loans totaling \$519.4 million in 2022.

Examiners also reviewed small business loans reported on the bank's 2020, 2021, and 2022 CRA loan registers. Firsttrust originated 2,379 loans totaling \$467.1 million in 2020, 1,697 loans totaling \$377.0 million in 2021, and 793 loans totaling \$256.2 million in 2022. The bank's 2020 and 2021 small business loans included a significant volume of PPP loans, including 1,588 PPP loans totaling \$220.1 million in 2020, and 858 PPP loans totaling \$105.4 million in 2021. Firsttrust originated additional PPP loans that did not meet the definition of a small business loan.

Furthermore, examiners reviewed other real estate secured loans reported on the bank's 2020, 2021, and 2022 CRA loan registers. Firsttrust originated 402 loans totaling \$91.5 million in 2020, 432 loans totaling \$96.6 million in 2021, and 457 loans totaling \$104.2 million in 2022. Since the bank originated a significant majority of these loans in the Philadelphia PA-NJ Multistate MSA assessment area, examiners did not include this loan product within the analysis for the Lehigh

County, PA and Towson, MD assessment areas, as there was insufficient volume to form conclusions.

For comparative purposes, the evaluation presents 2020, 2021, and 2022 aggregate HMDA loan data, 2020 and 2021 aggregate small business loan data, 2015 American Community Survey (ACS) data, 2020 Census data, and 2020, 2021 and 2022 D&B data. Although this evaluation presents the number and dollar volume of loans, examiners emphasized performance by number because number of loans is a better indicator of the number of individuals and businesses served.

Bank management provided information on community development loans, innovative or flexible loan programs, qualified investments, and retail and community development services since the prior CRA evaluation dated November 2, 2020.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Firsttrust's overall Lending Test performance is rated "Low Satisfactory." The bank's adequate performance in the Lending Activity, Assessment Area Concentration, Geographic Distribution, and Community Development Lending criteria, along with its good performance in the Borrower Profile and Innovative or Flexible Lending Practices criteria, supports this conclusion.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs. Examiners considered the institution's size, loan portfolio composition, and competition level. Firsttrust's good lending performance in the Philadelphia, PA-NJ Multistate MSA assessment area, adequate lending performance in the Lehigh, PA assessment area, and poor lending performance in the Towson, MD assessment area supports this conclusion.

Home Mortgage Loans

Within the combined assessment area, the bank originated or purchased 1,820 home mortgage loans totaling \$555.0 million in 2020, 1,188 home mortgage loans totaling \$414.7 million in 2021, and 689 home mortgage loans totaling \$260.2 million in 2022. This volume is slightly greater than the volume of home mortgage loans the bank made during the prior review period. During the prior review period, the bank made 1,124 home mortgage loans totaling \$275.3 million in 2017, 814 home mortgage loans totaling \$202.5 million in 2018, and 1,229 home mortgage loans totaling \$315.0 million in 2019. During the review period, the bank made 98.2 percent of its in-assessment area home mortgage loans (by count) in the Philadelphia, PA-NJ Multistate MSA assessment area, followed by 1.6 percent in the Lehigh County, PA assessment area, and then 0.1 percent in the Towson, MD assessment area.

Small Business Loans

Within the combined assessment area, the bank originated 1,809 small business loans totaling \$340.5 million in 2020, 1,327 small business loans totaling \$276.8 million in 2021, and 572 small

business loans totaling \$183.1 million in 2022. This volume is significantly higher than the volume of small business loans the bank made during the prior review period. During that review period, the bank originated 560 small business loans totaling \$155.1 million in 2017, 621 small business loans totaling \$170.2 million in 2018, and 599 small business loans totaling \$169.3 million in 2019. The bank's participation in SBA's PPP primarily contributed to the increase in small business lending during this review period. In 2020, the bank originated 1,144 PPP loans totaling \$140.3 million that were included as small business loans in the combined assessment area. In 2021, the bank originated 679 PPP loans totaling \$77.2 million that were also included as small business loans in the combined assessment area. During the review period, the bank made 97.5 percent of its in-assessment area small business loans (by count) in the Philadelphia, PA-NJ Multistate MSA assessment area, followed by 1.9 percent in the Lehigh County, PA assessment area, and then 0.6 percent in the Towson, MD assessment area.

Other Real Estate Secured Loans

Within the combined assessment area, the bank originated 347 other real estate secured loans totaling \$77.9 million in 2020, 379 other real estate secured loans totaling \$83.8 million in 2021, and 399 other real estate secured loans totaling \$85.7 million in 2022. During the prior review period, the bank made 386 other real estate secured loans totaling \$81.6 million in 2017, 418 other real estate secured loans totaling \$89.8 million in 2018, and 444 other real estate secured loans totaling \$98.2 million in 2019. During the review period, the bank made 99.3 percent of its in-assessment area other real estate secured loans (by count) in the Philadelphia, PA-NJ Multistate MSA assessment area, followed by 0.5 percent in the Lehigh County, PA assessment area, and then 0.2 percent in the Towson, MD assessment area.

Refer to the Lending Activity criterion under each assessment area for additional information.

Assessment Area Concentration

An adequate percentage of loans are made in the bank's assessment areas. The following table presents, by number and dollar volume, home mortgage, small business and other real estate secured loans made inside and outside the combined assessment area.

Lending Inside and Outside of the Combined Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	1,820	71.3	731	28.7	2,551	555,020	70.4	233,170	29.6	788,190
2021	1,188	75.0	396	25.0	1,584	414,660	72.1	160,785	27.9	575,444
2022	689	56.4	532	43.6	1,221	260,179	50.1	259,205	49.9	519,384
Subtotal	3,697	69.0	1,659	31.0	5,356	1,229,859	65.3	653,160	34.7	1,883,019
Small Business										
2020	1,809	76.0	570	24.0	2,379	340,516	72.9	126,603	27.1	467,119
2021	1,327	78.2	370	21.8	1,697	276,833	73.4	100,180	26.6	377,013
2022	572	72.1	221	27.9	793	183,069	71.5	73,134	28.5	256,203
Subtotal	3,708	76.2	1,161	23.8	4,869	800,418	72.7	299,917	27.3	1,100,335
Other Real Estate Secured										
2020	347	86.3	55	13.7	402	77,936	85.1	13,601	14.9	91,537
2021	379	87.7	53	12.3	432	83,766	86.7	12,847	13.3	96,613
2022	399	87.3	58	12.7	457	85,656	82.2	18,573	17.8	104,229
Subtotal	1,125	87.1	166	12.9	1,291	247,358	84.6	45,021	15.4	292,379
Total	8,530	74.1	2,986	25.9	11,516	2,277,635	69.5	998,098	30.5	3,275,733

Source: Bank Data Due to rounding, totals may not equal 100.0%

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. Examiners based this conclusion upon the bank's lending performance in low- and moderate-income census tracts within its assessment areas. Firsttrust's adequate performance of lending in the Philadelphia, PA-NJ Multistate MSA assessment area primarily supports this conclusion.

Borrower Profile

The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different size. Examiners based this conclusion upon the bank's lending performance of loans to low- and moderate-income borrowers and businesses with gross annual revenues (GARs) of \$1.0 million or less. Firsttrust's good performance of lending in the Philadelphia, PA-NJ Multistate MSA assessment area primarily supports this conclusion.

Innovative or Flexible Lending Practices

Firsttrust uses innovative and/or flexible lending practices in order to serve assessment area credit needs. While the bank offers innovative and/or flexible lending programs throughout the assessment areas, some state-sponsored programs are only available within that state. The

following table details the number and dollar volume of loans originated through innovative or flexible lending programs during the evaluation period.

Innovative or Flexible Lending Programs										
Type of Program	11/2/2020 – 12/31/2020		2021		2022		1/1/2023 – 11/6/2023		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Residential Loan Programs:										
FHA	20	4,839	59	12,635	23	5,484	35	7,976	137	30,934
VA	0	0	3	1,179	3	946	1	360	7	2,485
HomeFirst (Firsttrust)	1	138	9	1,502	14	2,445	11	1,852	35	5,937
HomeReady (FNMA)	11	2,177	31	6,341	11	2,389	3	607	56	11,514
Home Possible (FHLMC)	1	152	6	1,271	4	748	1	257	12	2,428
PHFA	3	583	13	2,469	15	3,021	15	3,020	46	9,093
Subtotals	36	7,889	121	25,397	70	15,033	66	14,072	293	62,391
Commercial Loan Programs:										
SBA – 504 & 7(a)	4	3,807	54	60,615	38	36,993	30	42,841	126	144,256
SBA – PPP	0	0	895	112,979	0	0	0	0	895	112,979
Subtotals	4	3,807	949	173,594	38	36,993	30	42,841	1,021	257,235
Totals	40	11,696	1,070	198,991	108	52,026	96	56,913	1,314	319,626
<i>Source: Bank Data.</i>										

Below are details of the bank’s innovative or flexible lending programs.

- Federal Housing Administration (FHA):** Firsttrust is an approved FHA lender. FHA loans benefit low- and moderate-income borrowers purchasing a 1-4 family primary residence. These loans feature down payments as low as 3.5 percent, lower closing costs, and require a minimum credit score of 620. A unique feature of FHA loans is that applicants may use homebuyer grants as sources of funds for down payment and closing costs.
- Veterans Administration (VA):** VA loans benefit veterans and active duty military personnel, who either are first-time homebuyers or are looking to build, repair, retain, and/or adapt an existing home for personal use. VA loans have a lower required credit score than most conventional loan programs (minimum credit score of 640), no down payment, and do not require mortgage insurance, which benefits low-and moderate-income borrowers.
- HomeFirst:** This is an in-house loan program providing purchasing and refinancing options for qualified borrowers. Options include low down payments, no private mortgage insurance, fixed rates, and flexible qualifying standards. The property must be in a low- or moderate-income census tract within the combined assessment area, or the borrower must be low- or moderate-income within the combined assessment area.
- Fannie Mae HomeReady:** HomeReady is a loan program offered through the Federal National Mortgage Corporation (Fannie Mae) that benefits low- and moderate-income

creditworthy borrowers. The advantages of this loan program are a lower qualifying credit score (minimum required is 620), a low down payment of three percent, reduced mortgage insurance costs, competitive pricing, and flexible funding. Additionally, it is permissible to use grants as sources of funds for down payment and closing costs.

- **Freddie Mac Home Possible:** Home Possible is a loan program offered through the Federal Home Loan Mortgage Corporation (Freddie Mac) designed specifically for low-income first-time home borrowers and retirees. The advantages of this loan program are a lower qualifying credit score (minimum required is 620), down payments as low as three percent, reduced mortgage insurance costs, and flexible funding. It is permissible to use grants as sources of funds for down payment and closing costs. To be eligible for this loan program, applicants' income must be limited up to 80.0 percent of the median area income.
- **Pennsylvania Housing Finance Agency (PHFA):** Through the PHFA, Firsttrust offers the Housing Finance Agency (HFA) Preferred and Keystone Home Loan programs. These programs are for lower-income, first-time homebuyers and require a down payment between three and five percent.
- **SBA:** The bank remains a certified lender with the SBA and participates in the following loan guarantee programs:
 - 7(a) Loan Program – This loan program helps entrepreneurs start or expand their small businesses, whose annual sales are \$5.0 million or less and/or do not exceed \$6.0 million in tangible net worth.
 - 504 Loan Program – This loan program provides long-term, fixed rate financing for major fixed assets that promote business growth and job creation.
 - Paycheck Protection Program (PPP) – In response to the COVID-19 pandemic, the PPP loans helped businesses and organizations with expenses related to payroll, rent, and utilities. The SBA ended this program on May 31, 2021.

In addition to the above loan programs where the bank originates the loan, the bank participates in other affordable housing programs where the bank assists in the borrower receiving funds for down payment and/or closing costs. These programs include Bethlehem Homebuyers Assistance Program, Philadelphia Housing Authority's Mobility Homeownership Program, and Philadelphia First Home Grant Program.

Community Development Loans

The bank has made an adequate level of community development loans. During the evaluation period, the bank originated 42 community development loans totaling \$149.1 million. This level of activity represents 3.0 percent of average total assets and 3.9 percent of total loans since the previous evaluation. These ratios exceed those at the prior evaluation, where community development loans represented 1.4 percent of average total assets and 1.8 percent of average total loans. The volume of community development lending increased since the previous evaluation, when the bank originated 27 community development loans totaling \$67.2 million. The higher level of community development loan activity reflects increased capacity and opportunities based

on asset growth and the bank’s participation in SBA’s PPP. However, performance was not consistent throughout the rated areas, with the vast majority of community development loans originated in the Philadelphia, PA-NJ Multistate MSA rated area. Particularly notable, Firsttrust did not originate any community development loans in the MD rated area, and only one such loan in the PA rated area.

Firsttrust’s community development loans primarily revitalized or stabilized low- and moderate-income census tracts and financed community service efforts within the rated areas. The following table illustrates the community development lending activity by rated area and community development purpose.

Community Development Lending by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Philadelphia, PA-NJ Multistate MSA	2	8,982	8	45,000	1	3,700	29	89,360	40	147,042
State of PA	0	0	0	0	0	0	1	21	1	21
State of MD	0	0	0	0	0	0	0	0	0	0
Regional	1	2,025	0	0	0	0	0	0	1	2,025
Total	3	11,007	8	45,000	1	3,700	30	89,381	42	149,088

Source: Bank Data

Since Firsttrust was responsive to community development needs and opportunities within its Philadelphia, PA-NJ Multistate MSA assessment area, examiners considered community development loans that benefitted that broader regional area. Below is a notable community development loan that benefitted the regional area:

- In 2022, the bank originated a \$12.2 million loan for the construction of a 30-unit apartment complex in Marlton, NJ. The project specifically designates five units as affordable housing for low- and moderate-income families. Firsttrust receives community development loan credit totaling \$2.0 million, representing a 16.7 percent pro rata share of the construction loan. This loan supports the bank’s affordable housing efforts within the regional area.

For additional details on community development loans, please refer to the individual rated area sections.

INVESTMENT TEST

Firsttrust’s overall Investment Test performance is rated “Low Satisfactory.” The bank’s adequate performance in the Investment and Grant Activity criterion supports this conclusion.

Investment and Grant Activity

Firsttrust has an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private

investors. Firsttrust made 172 qualified investments totaling \$29.6 million during the evaluation period. This volume includes 8 new qualified investments totaling \$10.5 million, 10 prior period investments still outstanding with a book value of \$8.9 million, 138 grants and donations totaling over \$9.4 million, and 14 educational improvement tax credits (EITCs) totaling \$735,000. Qualified investments equate to 0.6 percent of average total assets and 6.9 percent of average total securities since the prior evaluation. Firsttrust’s volume of qualified investments increased since the prior evaluation, in which the bank had 127 qualified investments totaling \$25.9 million. This amount equated to 0.6 percent of average total assets and 9.5 percent of average total securities at that evaluation.

Although Firsttrust’s overall volume of qualified investments increased since the prior evaluation, its performance was not consistent throughout the rated areas. The bank has a significant level of qualified investments in the Philadelphia, PA-NJ Multistate MSA rated area, and an adequate level in the PA rated area; however, the bank has a poor level in the MD rated area. The following table illustrates the qualified investment activity by rated area and community development purpose.

Qualified Investments by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Philadelphia, PA-NJ Multistate MSA	17	11,229	121	6,364	4	130	0	0	142	17,723
State of PA	2	6	6	120	0	0	0	0	8	126
State of MD	0	0	3	11	1	3	0	0	4	14
Regional*	9	10,122	7	544	2	1,100	0	0	18	11,766
Total	28	21,357	137	7,039	7	1,233	0	0	172	29,629

*Source: Bank Data. * Includes activity collectively benefitting the Philadelphia, PA-NJ Multistate MSA and state of PA rated areas.*

Examiners considered qualified investments that benefitted the broader regional and statewide area, including those that benefitted multiple rated areas. The following are examples of such qualified investments.

- In 2021, the bank purchased a \$1.7 million Federal National Mortgage Association (Fannie Mae) mortgage-backed security (MBS). The security consists of eight mortgages, six are in the Philadelphia, PA-NJ Multistate assessment area and two are in the Lehigh County, PA assessment area. Mortgages to low- and moderate-income borrowers secure this MBS. This investment supports affordable housing in the broader regional area.
- In 2022, the bank purchased a \$2.1 million Government National Mortgage Association (Ginnie Mae) MBS. The security consists of eight mortgages, seven are in the Philadelphia, PA-NJ Multistate assessment area and one is in the Lehigh County, PA assessment area. Mortgages to low- and moderate-income borrowers secures this MBS. This investment supports affordable housing in the broader regional area.
- During the evaluation period, the bank’s Foundation donated \$270,000 to a nonprofit that assists in food delivery to member food banks for the communities and families they serve

within the Philadelphia and Allentown regional areas. The donation supports community development services within the broader regional area.

- During the evaluation period, the bank's affiliate – the Daniel B. and Florence E. Green Foundation (the Foundation) provided \$180,000 in scholarships to high school students to attend the college of their choice. The Foundation awarded the scholarships primarily to students from low- and moderate-income families within the greater Philadelphia and Lehigh Valley regions.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. Firsttrust's good responsiveness in the Philadelphia, PA-NJ Multistate MSA assessment area, adequate responsiveness in the Lehigh County, PA assessment area, and poor responsiveness in the Towson, MD assessment area supports this conclusion. Examiners considered the overall significant volume of qualified investments, donations, and EITCs made during the evaluation period.

Community Development Initiatives

The bank rarely uses innovative and/or complex investments to support community development initiatives. Although investments include CRA-qualified, the MBSs, donations, and EITCs are not particularly innovative or complex.

SERVICE TEST

Firsttrust's overall Service Test performance is rated "Low Satisfactory." The bank's adequate performance in the Accessibility of Delivery Systems, Reasonableness of Business Hours and Services, and Community Development Services criteria supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment areas. Additionally, the bank's alternative delivery systems, including the ATM network, internet online and mobile banking, electronic bill pay, mobile pay, and telephone banking improve access to products and services. The bank maintains ATMs at each of its branch locations along with three stand-alone ATMs. Branch distribution and alternative delivery systems are generally consistent among the assessment areas.

The following table illustrates the distribution of branches and ATMs by tract income level.

Branch and ATM Distribution by Geography Income Level Combined Assessment Area								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	100	7.7	409,669	7.8	0	0.0	1	4.8
Moderate	302	23.4	1,234,542	23.6	0	0.0	0	0.0
Middle	431	33.4	1,829,786	35.0	9	50.0	10	47.6
Upper	414	32.0	1,681,074	32.2	9	50.0	9	42.9
NA	45	3.5	67,245	1.3	0	0.0	1	4.8
Total	1,292	100.0	5,222,316	100.0	18	100.0	21	100.0

Source: 2020 U.S. Census & Bank Data. Due to rounding, totals may not equal 100.0%

Changes in Branch Locations

To the extent changes have been made, the bank's closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed a branch office located in a middle-income census tract in the Philadelphia, PA-NJ Multistate MSA assessment area. While Firsttrust did not open any new branch offices during the evaluation period, the bank did open a branch office in an upper-income census tract in the Towson, MD assessment area just prior to the evaluation period in August 2020. Please refer to the individual assessment areas for additional details.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences portions of the assessment areas, particularly in low- and moderate-income geographies and/or individuals. All branch offices offer the same products and services, and adhere to generally the same schedule of hours. Generally, branch locations operated from 9:00 A.M. to 4:00 P.M. Monday through Friday, and 9:00 A.M. to 12:00 P.M. on Saturday. A majority of the branches offer drive-through services, providing extended hours. Every branch office has an ATM and most provide night deposit and safe deposit box services.

Community Development Services

The bank provides an adequate level of community development services. During the evaluation period, Firsttrust's directors, senior officers, managers, and employees provided 71 instances of qualified community development services to 29 different organizations or functions. The bank provided community development services to nonprofit organizations and functions relating primarily to community development services and economic development. The bank's overall involvement in community development services is similar to its performance during the prior evaluation period when the bank provided 70 instances of such service. The following table illustrates the bank's community development service instances by rated area and community development purpose.

Community Development Services by Rated Area					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Philadelphia, PA-NJ Multistate MSA	3	37	10	1	51
State of PA	3	4	1	0	8
State of MD	0	6	2	0	8
Regional	0	4	0	0	4
Total	6	51	13	1	71

Source: Bank Data

Examiners considered community development services that benefitted the broader regional and statewide area. The following include such services.

- During the evaluation period, an employee provided her technical marketing skills to a nonprofit organization that provides community building, education and growth opportunities for students, and youth empowerment. The organization specializes in services to low- and moderate-income individuals and small businesses throughout NJ. While representing the bank, this employee provides technical expertise to the community service organization.
- In 2022, an employee provided her financial skills to a nonprofit organization based in Reading, PA. The organization focuses on homelessness and hunger throughout Berks County. The organization supports its operations by offering a retail thrift store and a reuse and recycle program. While representing the bank, this employee provides financial expertise to the community service organization.

For additional details on community development services, please refer to the individual assessment area sections.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners reviewed the bank's compliance with the laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

PHILADELPHIA, PA-NJ MULTISTATE MSA

CRA RATING FOR PHILADELPHIA, PA-NJ MULTISTATE MSA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PHILADELPHIA, PA-NJ MULTISTATE MSA

The bank operates 16 full service branch offices within the Philadelphia, PA-NJ Multistate MSA assessment area. The bank's operations in the assessment area represent 98.1 percent of its total in-assessment area lending (by number), 94.8 percent of total deposits, and 88.9 percent of total branches. Except for expanding the NJ portion of the assessment area from only Cherry Hill Township to Camden County in its entirety, there have been no other changes to this assessment area since the previous CRA evaluation. Please refer to the overall Description of Assessment Areas section for additional information on this assessment area.

Economic and Demographic Data

For 2020 and 2021, the assessment area included 1,125 census tracts reflecting the following income designations according to the 2015 ACS:

- 91 low-income census tracts,
- 276 moderate-income census tracts,
- 393 middle-income census tracts,
- 347 upper-income census tracts, and
- 18 census tracts with no income designation.

The U.S. Census Bureau's 2020 Census updated demographic data, which went into effect in 2022. The 2020 Census data changed the number and income level of select tracts within the assessment area. For 2022, the same assessment area included 1,179 census tracts reflecting the following income designations according to the 2020 Census data:

- 88 low-income census tracts,
- 279 moderate-income census tracts,
- 388 middle-income census tracts,
- 380 upper-income census tracts, and
- 44 census tracts with no income designation.

Examiners used 2015 ACS data to evaluate the bank's 2020 and 2021 performance and the 2020 U.S. Census data to evaluate the bank's 2022 performance.

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Philadelphia, PA-NJ Multistate MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,179	7.5	23.7	32.9	32.2	3.7
Population by Geography	4,741,616	7.6	23.9	34.9	32.3	1.3
Housing Units by Geography	1,909,391	7.9	24.4	34.7	32.0	1.0
Owner-Occupied Units by Geography	1,154,366	4.9	20.0	38.2	36.2	0.8
Occupied Rental Units by Geography	611,377	12.3	30.9	30.0	25.5	1.3
Vacant Units by Geography	143,648	13.6	32.2	26.4	25.8	1.9
Businesses by Geography	673,450	5.2	20.0	33.7	39.5	1.5
Farms by Geography	11,151	3.1	16.8	43.2	36.2	0.7
Family Distribution by Income Level	1,125,325	22.7	17.2	19.5	40.5	0.0
Household Distribution by Income Level	1,765,743	26.0	15.6	16.8	41.6	0.0
Median Family Income - 15804 Camden, NJ Metropolitan Division	\$100,987	Median Housing Value			\$273,604	
Median Family Income - 33874 Montgomery County-Bucks County-Chester County, PA Metropolitan Division	\$117,345	Median Gross Rent			\$1,199	
Median Family Income - 37964 Philadelphia, PA Metropolitan Division	\$68,458	Families Below Poverty Level			9.1%	

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

There are 1,909,391 housing units in the assessment area. Of these units, 60.5 percent are owner-occupied, 32.0 percent are rental occupied, and 7.5 percent are vacant. The geographic distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. The above table shows only 4.9 percent of owner-occupied housing units are located in low-income census tracts, and 20.0 percent of the assessment area's owner-occupied housing units are in moderate-income tracts. This distribution reflects limited opportunities to originate home mortgage loans in low- and moderate-income census tracts in the assessment area.

Examiners used 2020, 2021, and 2022 FFIEC-updated median family income (MFI) data to analyze home mortgage loans under the borrower profile criterion. The following table shows MFI ranges for the Philadelphia, PA-NJ Multistate MSA assessment area.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Camden, NJ Metropolitan Division Median Family Income (15804)				
2020 (\$101,500)	<\$50,750	\$50,750 to <\$81,200	\$81,200 to <\$121,800	≥\$121,800
2021 (\$99,800)	<\$49,900	\$49,900 to <\$79,840	\$79,840 to <\$119,760	≥\$119,760
2022 (\$112,900)	<\$56,450	\$56,450 to <\$90,320	\$90,320 to <\$135,480	≥\$135,480
Montgomery County-Bucks County-Chester County, PA Metropolitan Division Median Family Income (33874)				
2020 (\$118,000)	<\$59,000	\$59,000 to <\$94,400	\$94,400 to <\$141,600	≥\$141,600
2021 (\$116,300)	<\$58,150	\$58,150 to <\$93,040	\$93,040 to <\$139,560	≥\$139,560
2022 (\$131,400)	<\$65,700	\$65,700 to <\$105,120	\$105,120 to <\$157,680	≥\$157,680
Philadelphia, PA Metropolitan Division Median Family Income (37964)				
2020 (\$71,100)	<\$35,550	\$35,550 to <\$56,880	\$56,880 to <\$85,320	≥\$85,320
2021 (\$67,500)	<\$33,750	\$33,750 to <\$54,000	\$54,000 to <\$81,000	≥\$81,000
2022 (\$75,000)	<\$37,500	\$37,500 to <\$60,000	\$60,000 to <\$90,000	≥\$90,000
<i>Source: FFIEC</i>				

The analysis of small business loans under the borrower profile criterion compares the distribution of businesses by GAR level. According to 2022 D&B data, there were 673,450 non-farm businesses in the assessment area. These businesses have the following GAR characteristics:

- 92.0 percent had GARs of \$1.0 million or less;
- 2.8 percent had GARs of more than \$1.0 million; and
- 5.2 percent had unreported GARs.

Service industries represent the largest share of total businesses in the assessment area at 36.1 percent, followed by non-classifiable establishments (26.6 percent), finance, insurance, and real estate (10.7 percent), and retail trade (9.7 percent). Most businesses have four or fewer employees (61.2 percent) and operate at a single location (94.4 percent). This information reflects the potential demand for, and the opportunity to originate, small business loans in the assessment area.

According to Moody's Analytics, several of the top employers in the assessment area include University of Pennsylvania Health System; Thomas Jefferson University & Health System, Inc.; Children's Hospital of Philadelphia; Tower Health; and The Vanguard Group.

Competition

The bank's assessment area reflects a highly competitive market for financial services. According to the June 30, 2023 FDIC Deposit Market Share Data, 71 financial institutions operated 1,070 full-service offices in the assessment area. Of these institutions, Firstrust ranked 10th with a 2.0 percent deposit market share and ranked 16th with a 1.5 percent branch market share. The top three institutions based on deposit market share included Wells Fargo Bank, National Association (NA) (16.4 percent); TB Bank, NA (13.8 percent); and PNC Bank, NA (13.3 percent).

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the assessment area. Based on 2022 peer mortgage data, 810 lenders originated or purchased 142,213 home mortgage loans. Of these lenders, Firsttrust ranked 45th by number of originations and purchases capturing 0.5 percent of total market share. The top three mortgage lenders in the assessment area included Citizens Bank, NA (6.3 percent); Wells Fargo Bank, NA (4.3 percent); and Police and Fire Federal Credit Union (4.1 percent).

There is also a high level of competition for small business loans among lenders in the assessment area. Based on 2021 peer small business data, 274 lenders originated or purchased 139,351 small business loans. Of these lenders, Firsttrust ranked 22nd by number of originations and purchases capturing 0.9 percent of total market share. The top three small business lenders in the assessment area included American Express National Bank (20.8 percent); JPMorgan Chase Bank, NA (7.6 percent); and Wells Fargo Bank, NA (6.1 percent).

Community Contact

As part of the evaluation process examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. Information obtained reflects the responsiveness of local financial institutions to credit and community development needs, and opportunities for participation in related activities.

Examiners contacted a representative of a community development organization that serves a neighborhood located in a low-income census tract in the city of Camden, NJ. The organization's primary goal is to increase homeownership in the area by creating affordable housing. The organization creates affordable housing by rehabilitating abandoned houses and constructing new housing. The contact noted that investors often purchase abandoned property, particularly in the inner-city areas, but never follow through with constructing new housing to rent out or sell. This has led to challenges in increasing the amount of available rental properties and homeownership in the area. The contact stated that financial institutions continue to build trust with consumers, and there is a demand for affordable housing and financing options, especially for CRA loan products. The organization often partners with local banks for regular homebuyer seminars, financial literacy, and money management courses. Overall, financial institutions are generally responsive to the residential lending needs of the neighborhood, but could offer more commercial and small business financing options, particularly for black- and brown-owned small businesses and communities. In addition, despite the engagement with local financial institutions, there is still a large percentage of unbanked or underbanked consumers in the neighborhood.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that flexible loan products, as well as affordable and obtainable small business loans, are primary credit needs of the assessment area. Community development needs include initiatives that support affordable housing development and rehabilitation, home buyer assistance programs, and financial literacy programs.

SCOPE OF EVALUATION – PHILADELPHIA, PA-NJ MULTISTATE MSA

This portion of the evaluation considers activity within the Philadelphia, PA-NJ Multistate MSA assessment area. Please refer to the overall Scope of Evaluation section for information on products and timeframe reviewed. Of the three assessment areas, the bank's performance in this area carried the most weight in determining the overall rating and conclusions, as this assessment area accounts for the largest portion of the bank's lending, deposits, and branches. Examiners used full-scope procedures to assess the bank's performance in this assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE PHILADELPHIA, PA-NJ MULTISTATE MSA

LENDING TEST

Firsttrust is rated "High Satisfactory" in the Lending Test for the Philadelphia, PA-NJ Multistate MSA. The bank's good performance in the Lending Activity, Borrower Profile, and Community Development Lending criteria, along with its adequate performance in the Geographic Distribution criterion, supports this conclusion.

Lending Activity

Lending levels reflect good responsiveness to the Philadelphia, PA-NJ Multistate MSA assessment area credit needs considering the institution's size, loan portfolio composition, and competition level. The bank's good performance in home mortgage, small business, and other real estate secured lending supports this conclusion.

Home Mortgage Loans

Firsttrust originated and purchased 1,799 home mortgage loans totaling \$550.3 million in 2020, 1,169 home mortgage loans totaling \$409.2 million in 2021, and 664 home mortgage loans totaling \$252.7 million in 2022 in the assessment area. For home mortgages originated and purchased in 2022, Firsttrust captured 0.5 percent of total market share by number of loans, ranking 45th among 810 lenders that made 142,213 loans in the assessment area. The top ranked lenders included Citizens Bank, NA, Wells Fargo Bank, NA, and Police and Fire Credit Union.

Small Business Loans

Firsttrust originated 1,764 small business loans totaling \$333.7 million in 2020, 1,293 small business loans totaling \$270.2 million in 2021, and 560 small business loans totaling \$178.1 million in 2022 in the assessment area. For small business loans originated and purchased in 2021, Firsttrust captured 0.9 percent of total market share by number of loans, ranking 22nd among 274 small business loan reporters that made 139,351 loans in the assessment area. The top ranked lenders included American Express National Bank, JPMorgan Chase Bank, NA, and Wells Fargo Bank, NA.

Other Real Estate Secured

Firsttrust originated 346 other real estate secured loans totaling \$77.8 million in 2020, 375 other real estate loans totaling \$82.4 million in 2021, and 396 other real estate loans totaling \$84.7 million in

2022 in the assessment area. Market share data is not available, as lenders do not report this loan product.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment area. Firsttrust's adequate performance of home mortgage, small business, and other real estate secured lending supports this conclusion. Examiners focused on the number of loans in low- and moderate-income census tracts. Based on 2020 census data, the number of low-income census tracts slightly declined from 91 tracts to 88 tracts in 2022. Furthermore, the number of moderate-income census tracts slightly increased from 276 tracts to 279 tracts in 2022.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. As shown in the following table, the bank's performance in low-income census tracts was similar to aggregate data in 2020, slightly exceeded aggregate data in 2021, and slightly trailed aggregate data in 2022. The bank's performance in low-income census tracts trailed demographic data throughout the review period. The opportunity to lend in low-income census tracts is limited as only 4.5 percent, 4.5 percent, and 4.9 percent of owner-occupied housing units are in low-income census tracts in 2020, 2021, and 2022, respectively. Firsttrust's performance in moderate-income census tracts trailed aggregate and demographic data throughout the review period.

Geographic Distribution of Home Mortgage Loans Philadelphia, PA-NJ Multistate MSA Assessment Area							
Tract Income Level		% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2020	4.5	2.3	43	2.4	6,925	1.3
	2021	4.5	2.7	35	3.0	5,220	1.3
	2022	4.9	4.1	17	2.6	3,096	1.2
Moderate							
	2020	19.5	15.9	224	12.5	49,822	9.1
	2021	19.5	17.1	141	12.1	30,577	7.5
	2022	20.0	20.5	76	11.4	17,282	6.8
Middle							
	2020	40.0	40.6	694	38.6	196,400	35.7
	2021	40.0	40.9	438	37.5	132,323	32.3
	2022	38.2	37.5	235	35.4	80,355	31.8
Upper							
	2020	36.0	41.3	837	46.5	297,004	54.0
	2021	36.0	39.3	555	47.5	241,068	58.9
	2022	36.2	37.2	327	49.2	149,693	59.2
Not Available							
	2020	0.0	0.0	1	0.1	199	0.0
	2021	0.0	0.0	0	0.0	0	0.0
	2022	0.8	0.7	9	1.4	2,292	0.9
Totals							
	2020	100.0	100.0	1,799	100.0	550,348	100.0
	2021	100.0	100.0	1,169	100.0	409,189	100.0
	2022	100.0	100.0	664	100.0	252,718	100.0

Source: 2015 ACS and 2020 U.S. Census; Bank Data: 2020, 2021, & 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. As shown in the following table, the bank's performance in low-income census tracts trailed aggregate data in 2020 and 2021, and trailed demographic data throughout the review period. The opportunity to lend in low-income census tracts is limited as only 4.7 percent, 5.2 percent, and 5.2 percent of businesses are in low-income census tracts in 2020, 2021, and 2022, respectively. The bank's performance in moderate-income census tracts trailed aggregate data in 2020 and 2021, and trailed demographic data throughout the review period.

Geographic Distribution of Small Business Loans						
Philadelphia, PA-NJ Multistate MSA Assessment Area						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	4.7	3.9	35	2.0	9,108	2.7
2021	5.2	4.3	27	2.1	7,965	2.9
2022	5.2	--	9	1.6	2,342	1.3
Moderate						
2020	18.5	16.4	233	13.2	51,476	15.4
2021	19.6	18.1	185	14.3	40,883	15.1
2022	20.0	--	77	13.8	23,753	13.3
Middle						
2020	35.9	38.4	617	35.0	118,489	35.5
2021	35.8	38.4	453	35.0	96,879	35.9
2022	33.7	--	197	35.2	61,578	34.6
Upper						
2020	40.3	40.8	866	49.1	150,826	45.2
2021	38.8	38.6	619	47.9	122,046	45.2
2022	39.5	--	268	47.9	88,079	49.5
Not Available						
2020	0.6	0.5	13	0.7	3,776	1.1
2021	0.6	0.5	9	0.7	2,439	0.9
2022	1.5	--	9	1.6	2,337	1.3
Totals						
2020	100.0	100.0	1,764	100.0	333,675	100.0
2021	100.0	100.0	1,293	100.0	270,212	100.0
2022	100.0	--	560	100.0	178,089	100.0

Source: 2020, 2021, & 2022 D&B Data; Bank Data; 2020 & 2021 CRA Aggregate Data. "--" data not available.
Due to rounding, totals may not equal 100.0%

Other Real Estate Secured Loans

The geographic distribution of other real estate secured loans reflects adequate penetration throughout the assessment area. As shown in the following table, the bank's performance in low-income census tracts was similar to demographic data throughout the review period. The bank's performance in moderate-income census tracts trailed demographic data throughout the review period.

Geographic Distribution of Other Real Estate Secured Loans Philadelphia, PA-NJ Multistate MSA Assessment Area					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2020	4.7	14	4.0	2,965	3.8
2021	5.2	21	5.6	3,831	4.6
2022	5.2	17	4.3	3,116	3.7
Moderate					
2020	18.5	59	17.1	12,125	15.6
2021	19.6	52	13.9	8,894	10.8
2022	20.0	61	15.4	9,847	11.6
Middle					
2020	35.9	107	30.9	22,343	28.7
2021	35.8	126	33.6	25,715	31.2
2022	33.7	161	40.7	35,227	41.6
Upper					
2020	40.3	165	47.7	40,242	51.7
2021	38.8	175	46.7	43,509	52.8
2022	39.5	154	38.9	35,571	42.0
Not Available					
2020	0.6	1	0.3	145	0.2
2021	0.6	1	0.3	450	0.5
2022	1.5	3	0.8	895	1.1
Totals					
2020	100.0	346	100.0	77,820	100.0
2021	100.0	375	100.0	82,399	100.0
2022	100.0	396	100.0	84,656	100.0

Source: 2020, 2021, & 2022 D&B Data: Bank Data. Due to rounding, totals may not equal 100.0%

Borrower Profile

The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different size. Firsttrust's adequate performance of home mortgage lending, good performance of small business lending, and excellent performance of other real estate secured lending supports this conclusion. Examiners focused on the number of home mortgage loans to low- and moderate-income borrowers and the number of small business and other real estate secured loans to businesses with GAR of \$1.0 million or less.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is adequate. As shown in the following table, the bank's

penetration of home mortgage lending to low-income borrowers exceeded aggregate data in 2020, was similar to aggregate data in 2021, and trailed aggregate data in 2022. The bank's performance to low-income borrowers also trailed demographic data during the review period. A low-income family in the assessment area may not likely qualify for a mortgage under conventional underwriting standards considering the median housing value of \$273,604. Therefore, the opportunities for lending to low-income families are limited. This helps explain the difference between the aggregate and bank's performance and the percentage of families at this income level. The bank's penetration of home mortgage loans to moderate-income borrowers was generally similar to aggregate and demographic data throughout the review period.

Distribution of Home Mortgage Loans by Borrower Income Level						
Philadelphia, PA-NJ Multistate MSA Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	23.0	7.0	146	8.1	24,190	4.5
2021	23.0	7.1	79	6.8	12,412	3.0
2022	22.7	9.2	34	5.1	5,426	2.1
Moderate						
2020	17.2	17.6	307	17.1	67,926	12.4
2021	17.2	17.3	191	16.3	41,932	10.2
2022	17.2	19.5	117	17.6	26,974	10.7
Middle						
2020	19.5	22.2	425	23.6	115,026	21.1
2021	19.5	21.3	269	23.0	71,050	17.5
2022	19.5	21.7	134	20.2	42,244	16.7
Upper						
2020	40.3	37.9	878	48.8	331,691	59.9
2021	40.3	37.8	611	52.3	279,401	68.4
2022	40.5	34.5	366	55.1	173,777	68.8
Not Available						
2020	0.0	15.3	43	2.4	11,515	2.1
2021	0.0	16.5	19	1.6	4,394	0.9
2022	0.0	15.1	13	2.0	4,298	1.7
Totals						
2020	100.0	100.0	1,799	100.0	550,349	100.0
2021	100.0	100.0	1,169	100.0	409,189	100.0
2022	100.0	100.0	664	100.0	252,718	100.0

Source: 2015 ACS & 2020 U.S. Census. Bank Data: 2020, 2021, & 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

Small Business Loans

The distribution of borrowers reflects good penetration among businesses of different sizes. As shown in the following table, the bank’s penetration of loans to businesses with GAR of \$1.0 million or less trailed demographic data throughout the review period; however exceeded aggregate data in 2020 and 2021.

Distribution of Small Business Loans by Gross Annual Revenue Category Philadelphia, PA-NJ Multistate MSA Assessment Area						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2020	89.6	40.2	936	53.1	111,057	33.3
2021	90.7	44.5	706	54.6	118,314	43.8
2022	92.0	--	294	52.5	85,763	48.2
>\$1,000,000						
2020	4.0	--	793	45.0	219,678	65.8
2021	3.4	--	465	36.0	141,363	52.3
2022	2.8	--	236	42.1	91,259	51.2
Revenue Not Available						
2020	6.4	--	35	2.0	2,940	0.9
2021	5.9	--	122	9.4	10,535	3.9
2022	5.2	--	30	5.4	1,067	0.6
Totals						
2020	100.0	100.0	1,764	100.0	333,675	100.0
2021	100.0	100.0	1,293	100.0	270,212	100.0
2022	100.0	--	560	100.0	178,089	100.0

Source: 2020, 2021, & 2022 D&B Data: Bank Data; 2020 & 2021 CRA Aggregate Data: "--" data not available
Due to rounding, totals may not equal 100.0%

Other Real Estate Secured Loans

The distribution of borrowers reflects excellent penetration among businesses of different sizes. As shown in the following table, the bank’s penetration of loans to businesses with GAR of \$1.0 million or less exceeded demographic data throughout the review period.

Distribution of Other Real Estate Secured Loans by Gross Annual Revenue Category Philadelphia, PA-NJ Multistate MSA Assessment Area					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2020	89.6	326	94.2	71,356	91.7
2021	90.7	355	94.7	75,509	91.6
2022	92.0	368	92.9	75,404	89.1
>\$1,000,000					
2020	4.0	20	5.8	6,464	8.3
2021	3.4	19	5.1	6,666	8.1
2022	2.8	27	6.8	8,912	10.5
Revenue Not Available					
2020	6.4	0	0.0	0	0.0
2021	5.9	1	0.3	224	0.3
2022	5.2	1	0.3	340	0.4
Totals					
2020	100.0	346	100.0	77,820	100.0
2021	100.0	375	100.0	82,399	100.0
2022	100.0	396	100.0	84,656	100.0
<i>Source: 2020, 2021, & 2022 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%</i>					

Community Development Loans

Firsttrust has made a relatively high level of community development loans. During the evaluation period, Firsttrust made 40 community development loans totaling \$147.0 million that specifically benefitted the Philadelphia, PA-NJ Multistate MSA. This represents an increase since the prior examination, where the bank made 25 loans totaling \$63.8 million. The SBA's PPP loans comprise 8 out of the 40 community development loans in the area, totaling \$5.8 million. Additionally, the bank increased the amount of construction loans intended to revitalize and stabilize low- and moderate-income census tracts.

Community Development Lending Philadelphia, PA-NJ Multistate MSA Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
11/2/2020 - 12/31/2020	0	0	0	0	0	0	1	1,600	1	1,600
2021	1	1,313	3	11,000	0	0	15	30,382	19	42,695
2022	0	0	2	17,000	0	0	11	37,234	13	54,234
1/1/2023 – 11/6/2023	1	7,669	3	17,000	1	3,700	2	20,144	7	48,513
Total	2	8,982	8	45,000	1	3,700	29	89,360	40	147,042

Source: Bank Data

The following is a sample of community development loans that benefitted the assessment area:

- In 2022, the bank originated an \$11.5 million loan for the construction of a 63-unit residential complex in a moderate-income census tract in North Philadelphia. The site was formerly an abandoned gas station. This loan will revitalize or stabilize the moderate-income census tract by attracting new residents to the area.
- In 2021 and 2022, the bank provided \$15.5 million in financing for the acquisition and construction of a youth basketball center in a moderate-income census tract in Philadelphia, PA. The organization blends basketball with various programs to support and empower youth to become leaders within their community through workshops and educational programs that build valuable skills. A majority of the students qualify for the national free or reduce-priced lunch program. These loans support community development services within the assessment area.
- In 2023, the bank provided a \$7.7 million loan for construction and permanent financing of a 49-unit student housing facility that the borrower will convert into Section 8 apartments for low- and moderate-income families, including the elderly and disabled. This loan supports the bank's efforts in providing affordable housing in the assessment area.
- In 2021, the bank originated six PPP loans totaling \$2.0 million to nonprofit organizations located in low- or moderate-income census tracts. The bank originated two additional PPP loans for over \$3.8 million to businesses located in low- or moderate-income census tracts. These loans, which do not qualify as small business loans, revitalize or stabilize low- and moderate-income census tracts by supporting nonprofits and businesses struggling during the COVID-19 pandemic.

INVESTMENT TEST

Firsttrust is rated "High Satisfactory" in the Investment Test for the Philadelphia, PA-NJ Multistate MSA. The bank's good performance in the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria supports this conclusion.

Investment and Grant Activity

Firsttrust has a significant level of qualified community development investments and grants within the Philadelphia, PA-NJ Multistate MSA, occasionally in a leadership position. Firsttrust made 142 qualified investments, donations, and EITCs totaling \$17.7 million that specifically benefitted this assessment area. This includes 8 prior period investments still outstanding with a combined book value of \$6.9 million, 1 new investment totaling \$1.4 million, 122 grants and donations totaling nearly \$8.9 million, and 11 EITCs totaling \$635,000. The following table illustrates the bank's qualified investment activity by year and purpose.

Qualified Investments Philadelphia, PA-NJ Multistate MSA Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	8	6,860	0	0	0	0	0	0	8	6,860
11/2/2020-12/31/2020	0	00	0	0	0	0	0	0	0	0
2021	1	1,364	0	0	0	0	0	0	1	1,364
2022	0	0	0	0	0	0	0	0	0	0
1/1/2023-11/6/2023	0	0	0	0	0	0	0	0	0	0
Subtotal	9	8,224	0	0	0	0	0	0	9	8,224
Qualified Grants & Donations	8	3,005	110	5,729	4	130	0	0	122	8,864
EITCs	0	0	11	635	0	0	0	0	11	635
Subtotal	8	3,005	121	6,364	4	130	0	0	133	9,499
Total	17	11,229	121	6,364	4	130	0	0	142	17,723

Source: Bank Data

In addition to the qualified investments above, the bank maintained other qualified investments that collectively benefitted this assessment area and the Lehigh County, PA assessment area. These investments consist of seven new qualified investments totaling \$9.2 million, two prior period investments totaling \$2.1 million, and seven donations totaling \$543,500.

The following is a sample of qualified investments that specifically benefitted the Philadelphia, PA-NJ Multistate assessment area.

- In 2022, the bank purchased a \$1.4 million Freddie Mac MBS. The security consists of six mortgages, all located in the Philadelphia, PA-NJ Multistate assessment area. Mortgages to low- and moderate-income borrowers secures this MBS. This investment supports affordable housing in the assessment area.
- In 2023, the bank's Foundation provided a \$2.75 million grant to support Federation Housing's development of a 60-unit affordable housing complex for low-income senior citizens in Trevoise, PA. The subject property provides for low-income housing tax credits. This grant enhances affordable housing opportunities in the assessment area.

- The bank’s Foundation donated \$1.0 million during the evaluation period to a nonprofit organization that specializes in basketball activities for the underserved youth in Philadelphia. Through its sports activities, the organization enhances positive coaching and mentorship, academic enrichment, health and wellness, and leadership development opportunities. This donation supports community service organizations in the assessment area.
- Collectively, the bank and Foundation provided \$455,000 in donations to a nonprofit organization that serves students in the Philadelphia School District. The organization addresses the lack of equitable access to educational opportunities for the lower-income students by providing more support and better learning environments. These donations enhance community development services in the assessment area.
- During the evaluation period, the bank made 11 contributions totaling \$635,000 to eligible nonprofit organizations through the PA EITC program. Organizations under this program include scholarship and educational improvement organizations. The organizations support community development by providing community services and programs to support low- and moderate-income persons and families in the assessment area. The following is a sample of EITCs that support community development service organizations in the assessment area.
 - In 2021, the bank purchased a \$100,000 EITC for an elementary school that administers these contributions to support programs and needs geared to benefit low and moderate-income students in Montgomery and Philadelphia Counties.
 - In 2021, the bank purchased a \$50,000 EITC for an independent high school in Philadelphia that provides private education for families that cannot afford higher costing education.
 - In 2021, the bank purchased a \$50,000 EITC for a career and technical high school in Philadelphia. The school provides specialized education to primarily low- and moderate-income students in the areas of web design, carpentry, computer technology, culinary arts, cosmetology, and electrician skills.

Responsiveness to Credit and Community Development Needs

The bank exhibits good responsiveness to credit and community economic development needs. Firstrust continues to obtain and retain a good level of equity investments and make a high volume of donations and EITCs that primarily support community development services in the Philadelphia, PA-NJ Multistate MSA assessment area. The qualified investments are assisting in addressing the needs identified by bank management and a community contact.

Community Development Initiatives

The bank rarely uses innovative and/or complex investments to support community development initiatives. Although investments include CRA-qualified, the MBSs, donations, and EITCs are not particularly innovative or complex.

SERVICE TEST

Firsttrust is rated “Low Satisfactory” in the Service Test for the Philadelphia, PA-NJ Multistate MSA. The bank’s adequate performance in the Accessibility of Delivery Systems, Reasonableness of Business Hours and Services, and Community Development Services criteria supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. Firsttrust operates 16 full-service branches within the assessment area, each providing an ATM, and three additional proprietary ATMs. The following table illustrates the branch and ATM distribution by tract income level.

Branch and ATM Distribution by Geography Income Level Philadelphia, PA-NJ Multistate MSA Assessment Area								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	88	7.5	361,206	7.6	0	0.0	1	5.3
Moderate	279	23.7	1,131,856	23.9	0	0.0	0	0.0
Middle	388	32.9	1,654,449	34.9	8	50.0	9	47.4
Upper	380	32.2	1,533,384	32.3	8	50.0	8	42.1
NA	44	3.7	60,721	1.3	0	0.0	1	5.3
Total	1,179	100.0	4,741,616	100.0	16	100.0	19	100.0

Source: 2020 U.S. Census; Bank Data

Firsttrust does not operate any branches in low- or moderate-income census tracts; however, the bank has one proprietary ATM located in a low-income census tract in Philadelphia County. Furthermore, several branches are in close proximity to low- or moderate-income census tracts, which benefit the assessment area’s low- and moderate-income census tracts and/or low- and moderate-income individuals. Additionally, the bank offers other alternative delivery systems that improve accessibility to its products and services for all geographies within the assessment area. These delivery systems include online, mobile, and telephone banking.

Changes in Branch Locations

To the extent changes have been made, the bank’s closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed its Flourtown, Montgomery County, PA branch office that was located in a middle-income census tract. Firsttrust did not open any new branch offices during the evaluation period in this assessment area.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences portions of the assessment areas, particularly in low- and moderate-income geographies and/or individuals. All branch offices

offer the same products and services, and adhere to generally the same schedule of hours. Generally, branch locations operated from 9:00 A.M. to 4 P.M. Monday through Friday, and 9:00 A.M. to 12:00 P.M. on Saturday. The City Avenue, Horsham, Market Street Financial Center, and South (Point Breeze) branch offices are not open on Saturday. A majority of the branches offer drive-through services providing extended hours. Every branch office has an ATM and most provide night deposit and safe deposit box services.

Community Development Services

The bank provides an adequate level of community development services within the Philadelphia, PA-NJ Multistate MSA assessment area. During the evaluation period, employees contributed 51 instances of community development service activities. This performance is below the bank’s performance at the previous evaluation period during which there were 66 instances of community development services. Effects of the COVID-19 pandemic primarily attributed to the decline in community development service instances. The following table illustrates the community development service activity by year and purpose.

Community Development Services Philadelphia, PA-NJ Multistate MSA Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
11/2/2020 – 12/31/2020	0	5	2	0	7
2021	1	13	3	0	17
2022	1	13	3	0	17
1/1/2023 – 11/6/2023	1	6	2	1	10
Total	3	37	10	1	51

Source: Bank Data

The following is a sample of community development services that benefit the assessment area.

- During the evaluation period, a bank officer served on the board of the Philadelphia Chapter of a national literacy organization. The organization provides students and volunteers various literacy services, community education programs, and testing centers for low- and moderate-income individuals in Philadelphia. The bank officer’s financial knowledge enhances the organization’s operations.
- During the evaluation period, a bank officer served on the board and other committees of an economic development organization that serves the Chinatown community of Philadelphia. The organization addresses the needs of urban renewal and affordable housing development within Chinatown. The organization also provides a comprehensive approach to meet the need for cultural and economic development within the commercial district. While representing the bank, this bank officer provides financial expertise to the economic development organization.
- During the evaluation period, a lending officer served on the board of a food bank that

serves Bucks and Montgomery Counties, PA. The organization distributes food, including special dietary food, to low-income families, food pantries, and community organizations. The lending officer provides their financial expertise to the community service organization.

- During the evaluation period, a bank officer served on the board of a national community service organization with a primary location in Philadelphia, PA. The organization focuses on the importance of diversity, belonging, inclusivity, and equity for students and school. This organization primarily serves students of low- and moderate-income families, as a majority of the students in Philadelphia participate in the national free or reduced-lunch program. While representing the bank, this bank officer provides financial expertise to the community service organization.

In addition to the above, the bank purchased ten mortgage loans totaling \$1.3 million from Habitat for Humanity Philadelphia in 2021. The loans are primarily to low- and moderate-income borrowers in low- and moderate-income census tracts within Philadelphia County. The bank's purchase of these loans provides the organization with capital to continue its mission of providing affordable housing to qualified families in low- and moderate-income neighborhoods in Philadelphia.

STATE OF PENNSYLVANIA

CRA RATING FOR (RATED AREA #1): SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PENNSYLVANIA

The bank operates one full service branch office within the Lehigh, PA assessment area. The bank's operations in the assessment area represent 1.6 percent of its total in-assessment area lending (by number), 4.3 percent of total deposits, and 5.6 percent of total branches. The bank made no changes to this assessment area since the previous CRA evaluation. Please refer to the overall Description of Assessment Areas section for additional information on this assessment area.

Economic and Demographic Data

For 2020 and 2021, the assessment area included 76 census tracts reflecting the following income designations according to the 2015 ACS:

- 11 low-income census tracts,
- 14 moderate-income census tracts,
- 29 middle-income census tracts, and
- 22 upper-income census tracts.

For 2022, the same assessment area included 81 census tracts reflecting the following income designations according to the 2020 Census data:

- 12 low-income census tracts,
- 16 moderate-income census tracts and
- 30 middle-income census tracts, and
- 23 upper-income census tracts.

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Lehigh County, PA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	14.8	19.8	37.0	28.4	0.0
Population by Geography	374,557	12.9	20.8	35.2	31.1	0.0
Housing Units by Geography	146,699	11.6	20.7	37.2	30.4	0.0
Owner-Occupied Units by Geography	90,661	4.8	14.7	40.1	40.4	0.0
Occupied Rental Units by Geography	49,411	21.8	31.8	32.9	13.5	0.0
Vacant Units by Geography	6,627	28.9	20.5	31.0	19.6	0.0
Businesses by Geography	43,956	12.3	18.9	33.9	34.8	0.0
Farms by Geography	922	2.8	10.6	37.2	49.3	0.0
Family Distribution by Income Level	94,393	23.4	18.1	20.4	38.1	0.0
Household Distribution by Income Level	140,072	25.8	16.8	17.9	39.5	0.0
Median Family Income - 10900 Allentown-Bethlehem-Easton, PA-NJ MSA		\$84,676	Median Housing Value			\$209,747
Families Below Poverty Level		9.1%	Median Gross Rent			\$1,119

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

There are 146,699 housing units in the assessment area. Of these units, 61.8 percent are owner-occupied, 33.7 percent are rental occupied, and 4.5 percent are vacant. As previously stated, the geographic distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. The above table shows only 4.8 percent and 14.7 percent of owner-occupied housing units are located in low- and moderate-income census tracts, respectively. This distribution reflects limited opportunities to originate home mortgage loans in low- and moderate-income census tracts in the assessment area.

The 2020, 2021, and 2022 FFIEC-updated MFI data to analyze home mortgage loans under the borrower profile criterion for the Lehigh County, PA assessment area is as follows:

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Allentown-Bethlehem-Easton, PA-NJ MSA Median Family Income (10900)				
2020 (\$80,400)	<\$40,200	\$40,200 to <\$64,320	\$64,320 to <\$96,480	≥\$96,480
2021 (\$84,900)	<\$42,450	\$42,450 to <\$67,920	\$67,920 to <\$101,880	≥\$101,880
2022 (\$94,300)	<\$47,150	\$47,150 to <\$75,440	\$75,440 to <\$113,160	≥\$113,160

Source: FFIEC

According to 2022 D&B data, there were 43,956 non-farm businesses in the assessment area. These businesses have the following GAR characteristics:

- 89.5 percent had GARs of \$1.0 million or less;

- 3.3 percent had GARs of more than \$1.0 million; and
- 7.2 percent had unreported GARs.

Service industries represent the largest share of total businesses in the assessment area at 35.6 percent, followed by non-classifiable establishments (22.3 percent), retail trade (11.3 percent), and finance, insurance, and real estate (10.6 percent). Most businesses have four or fewer employees (62.7 percent) and operate at a single location (92.5 percent). This information reflects the potential demand for, and the opportunity to originate, small business loans in the assessment area.

According to PA's Department of Labor & Industry, several of the top employers in the assessment area include Lehigh Valley Hospital Center, Saint Luke's Hospital, Amazon.com Services Inc., Lehigh Valley Physician Group, and Mack Trucks, Inc.

Competition

The bank's assessment area reflects a moderate competitive market for financial services. According to the June 30, 2023 FDIC Deposit Market Share Data, 23 financial institutions operated 79 full-service offices in the assessment area. Of these institutions, Firsttrust ranked 16th with a 1.6 percent deposit market share and ranked 18th with a 1.3 percent branch market share. The top three institutions based on deposit market share included Wells Fargo Bank, NA (23.2 percent); Truist Bank, NA (11.8 percent); and PNC Bank, NA (7.3 percent).

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the assessment area. Based on 2022 peer mortgage data, 410 lenders originated or purchased 11,031 home mortgage loans. Of these lenders, Firsttrust ranked 88th by number of originations and purchases capturing 0.2 percent of total market share. The top three mortgage lenders in the assessment area included Wells Fargo Bank, NA (5.7 percent); Rocket Mortgage (4.4 percent); and CrossCountry Mortgage, LLC (4.2 percent).

There is also a high level of competition for small business loans among lenders in the assessment area. Based on 2021 peer small business data, 120 lenders originated or purchased 9,206 small business loans. Of these lenders, Firsttrust ranked 37th by number of originations and purchases capturing 0.3 percent of total market share. The top three small business lenders in the assessment area included American Express National Bank (15.4 percent); Wells Fargo Bank, NA (10.3 percent); and Bank of America, NA (7.3 percent).

Community Contact

In October 2023, an examiner participated in a community development tour of Allentown, with emphasis on the low- and moderate-income neighborhoods in 1st and 6th wards. Regulatory agencies, local government officials, nonprofit organizations, and representatives of financial institutions attended the event. During the event, the regulatory agencies and nonprofit organizations demonstrated Allentown's community development needs and provided opportunities for financial institutions to participate in programs that address those needs. For example, the tour illustrated the need for affordable housing and the current housing projects under construction that are addressing those needs. The tour also emphasized the need for continued economic

development by showcasing several small businesses that received funding through a local Community Development Financial Institution (CDFI). The tour also highlighted an elementary school that received community funding through donations to update its playground, basketball court, and a specialized classroom for behavioral-challenged students. These donations supported community development services for the school. Lastly, the tour revealed several projects where developers were constructing mixed-use properties for housing and shopping. These projects will revitalize and stabilize low- and moderate-income census tracts in Allentown. Overall, the tour illustrated the need for all types of community development in Allentown, particularly within the 1st and 6th ward neighborhoods.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that affordable housing programs, community loan funds for small businesses, projects that support education and recreation for students, and ventures that revitalize or stabilize low- and moderate-income census tracts, are primary credit and community development needs in the assessment area.

SCOPE OF EVALUATION – STATE OF PENNSYLVANIA

This portion of the evaluation considers activity within the Lehigh County, PA assessment area. Please refer to the overall Scope of Evaluation section for information on products and timeframe reviewed. Of the three assessment areas, the bank's performance in this area carried less weight than the Philadelphia, PA-NJ Multistate MSA assessment area in determining the overall rating and conclusions, as this assessment area accounts for a smaller portion of the bank's lending, deposits, and branches. Examiners used full-scope procedures to assess the bank's performance in this assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE STATE OF PENNSYLVANIA

LENDING TEST

Firsttrust is rated "Low Satisfactory" in the Lending Test for the state of PA. The bank's adequate performance in the Lending Activity and Borrower Profile criteria, along with its good performance in the Geographic Distribution criterion, and poor performance in the Community Development Lending criterion, supports this conclusion.

Lending Activity

Lending levels reflect adequate responsiveness to the Lehigh County, PA assessment area credit needs considering the institution's size, loan portfolio composition, and competition level. The bank's adequate performance in home mortgage and small business lending supports this conclusion.

Home Mortgage Loans

Firsttrust originated and purchased 21 home mortgage loans totaling \$4.7 million in 2020, 19 home mortgage loans totaling \$5.5 million in 2021, and 21 home mortgage loans totaling \$6.2 million in 2022 in the assessment area. This volume represents a significant increase since the prior evaluation in which the bank originated nine home mortgage loans totaling \$769,000 in 2017, seven loans totaling \$1.1 million in 2018, and six loans totaling \$1.2 million in 2019. For home mortgages originated and purchased in 2022, Firsttrust captured 0.2 percent of total market share by number of loans, ranking 88th among 410 lenders that made 11,031 loans in the assessment area. The top ranked lenders included Wells Fargo Bank, NA; Rocket Mortgage; and CrossCountry Mortgage, LLC.

Small Business Loans

Firsttrust originated 35 small business loans totaling \$5.5 million in 2020, 25 small business loans totaling \$5.1 million in 2021, and 10 small business loans totaling \$4.4 million in 2022 in the assessment area. This volume also represents a significant increase since the prior evaluation in which the bank originated one small business loan totaling \$249,000 in 2017, four loans totaling \$2.4 million in 2018, and eight loans totaling \$2.0 million in 2019. For small business loans originated and purchased in 2021, Firsttrust captured 0.3 percent of total market share by number of loans, ranking 37th among 120 small business loan reporters that made 9,206 loans in the assessment area. The top ranked lenders included American Express National Bank; Wells Fargo Bank, NA; and Bank of America, NA.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the assessment area. Firsttrust's good performance of home mortgage lending supports this conclusion. Examiners focused on the number of loans in low- and moderate-income census tracts. Based on 2020 census data, the number of low-income census tracts slightly increased from 11 tracts to 12 tracts in 2022. Furthermore, the number of moderate-income census tracts slightly increased from 14 tracts to 16 tracts in 2022.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. As shown in the following table, the bank's performance in low-income census tracts exceeded aggregate and demographic data in 2020 and 2022, and was similar to such data in 2021. The opportunity to lend in low-income census tracts is limited as only 4.6 percent, 4.6 percent, and 4.8 percent of owner-occupied housing units are in low-income census tracts in 2020, 2021, and 2022, respectively. Firsttrust's performance in moderate-income census tracts exceeded aggregate and demographic data in 2020 and 2022. The bank did not originate any loans in moderate-income census tracts in 2021.

Geographic Distribution of Home Mortgage Loans Lehigh County, PA Assessment Area							
Tract Income Level		% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2020	4.6	5.4	2	9.5	304	6.5
	2021	4.6	5.4	1	5.3	25	0.5
	2022	4.8	8.9	2	9.5	332	5.4
Moderate							
	2020	13.5	11.7	4	19.0	375	8.0
	2021	13.5	13.3	0	0.0	0	0.0
	2022	14.7	18.2	5	23.8	768	12.4
Middle							
	2020	38.5	35.0	3	14.3	459	9.8
	2021	38.5	36.3	5	26.3	1,262	23.1
	2022	40.1	35.8	5	23.8	1,130	18.3
Upper							
	2020	43.4	47.9	12	57.1	3,533	75.6
	2021	43.4	45.0	13	68.4	4,184	76.5
	2022	40.4	37.1	9	42.9	3,945	63.9
Totals							
	2020	100.0	100.0	21	100.0	4,671	100.0
	2021	100.0	100.0	19	100.0	5,471	100.0
	2022	100.0	100.0	21	100.0	6,175	100.0

Source: 2015 ACS & 2020 U.S. Census; Bank Data: 2020, 2021, & 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. As shown in the following table, the bank's performance in low-income census tracts exceeded aggregate and demographic data in 2020 and 2021; however, the bank did not originate any loans in such tracts in 2022. The opportunity to lend in low-income census tracts is slightly limited as 10.4 percent, 10.9 percent, and 12.3 percent of businesses are in low-income census tracts in 2020, 2021, and 2022, respectively. The bank's performance in moderate-income census tracts trailed aggregate and demographic data in 2020 and 2021, and the bank did not originate any loans in such tracts in 2022.

Geographic Distribution of Small Business Loans						
Lehigh County, PA Assessment Area						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	10.4	7.9	4	11.4	265	4.8
2021	10.9	8.1	4	16.0	662	12.9
2022	12.3	--	0	0.0	0	0.0
Moderate						
2020	15.4	16.0	5	14.3	839	15.3
2021	15.8	16.9	3	12.0	990	19.3
2022	18.9	--	1	10.0	780	17.7
Middle						
2020	34.0	34.8	7	20.0	370	6.7
2021	33.7	34.5	6	24.0	656	12.8
2022	33.9	--	3	30.0	1,771	40.1
Upper						
2020	40.2	41.3	19	54.3	4,020	73.2
2021	39.6	40.5	12	48.0	2,828	55.1
2022	34.8	--	6	60.0	1,864	42.2
Totals						
2020	100.0	100.0	35	100.0	5,494	100.0
2021	100.0	100.0	25	100.0	5,136	100.0
2022	100.0	--	10	100.0	4,415	100.0

Source: 2020, 2021, & 2022 D&B Data; Bank Data; 2020 & 2021 CRA Aggregate Data. "--" data not available. Due to rounding, totals may not equal 100.0%

Borrower Profile

The distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different size. Firsttrust's adequate performance of home mortgage lending supports this conclusion. Examiners focused on the number of home mortgage loans to low- and moderate-income borrowers and the number of small business loans to businesses with GAR of \$1.0 million or less.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is adequate. As shown in the following table, the bank did not make any loans in low-income census tracts in 2020 and 2021; however, the bank made five loans in 2022, which exceeded aggregate data and was similar to demographic data. A low-income family in the assessment area may not likely qualify for a mortgage under conventional underwriting standards considering the median housing value of \$209,747. Therefore, the

opportunities for lending to low-income families are limited. This helps explain the various differences between the aggregate and bank’s performance and the percentage of families at this income level. The bank’s penetration of home mortgage loans to moderate-income borrowers exceeded aggregate and demographic data in 2020, but trailed such data in 2021 and 2022.

Distribution of Home Mortgage Loans by Borrower Income Level						
Lehigh County, PA Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	22.8	7.3	0	0.0	0	0.0
2021	22.8	8.8	0	0.0	0	0.0
2022	23.4	10.2	5	23.8	792	12.8
Moderate						
2020	18.3	16.9	4	19.0	874	18.7
2021	18.3	19.0	1	5.3	155	2.8
2022	18.1	21.3	3	14.3	455	7.4
Middle						
2020	20.8	19.9	6	28.6	676	14.5
2021	20.8	21.2	6	31.6	812	14.8
2022	20.4	21.9	2	9.5	406	6.6
Upper						
2020	38.2	38.2	11	52.4	3,122	66.8
2021	38.2	34.2	10	52.6	4,007	73.2
2022	38.1	31.3	11	52.4	4,522	73.2
Not Available						
2020	0.0	17.6	0	0.0	0	0.0
2021	0.0	16.8	2	10.5	498	9.1
2022	0.0	15.3	0	0.0	0	0.0
Totals						
2020	100.0	100.0	21	100.0	4,671	100.0
2021	100.0	100.0	19	100.0	5,471	100.0
2022	100.0	100.0	21	100.0	6,175	100.0

Source: 2015 ACS & 2020 U.S. Census; Bank Data: 2020, 2021, & 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

Small Business Loans

The distribution of borrowers reflects good penetration among businesses of different sizes. As shown in the following table, the bank’s penetration of loans to businesses with GAR of \$1.0 million or less trailed demographic data throughout the review period; however exceeded aggregate data in 2020 and 2021.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Lehigh County, PA Assessment Area						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2020	86.9	42.8	27	77.1	3,430	62.4
2021	87.9	48.3	18	72.0	3,674	71.5
2022	89.5	--	8	80.0	2,635	59.7
>\$1,000,000						
2020	4.3	--	8	22.9	2,064	37.6
2021	3.9	--	4	16.0	1,259	24.5
2022	3.2	--	2	20.0	1,780	40.3
Revenue Not Available						
2020	8.8	--	0	0.0	0	0.0
2021	8.2	--	3	12.0	203	4.0
2022	7.2	--	0	0.0	0	0.0
Totals						
2020	100.0	100.0	35	100.0	5,494	100.0
2021	100.0	100.0	25	100.0	5,136	100.0
2022	100.0	--	10	100.0	4,415	100.0
<i>Source: 2020, 2021 & 2022 D&B Data; Bank Data; 2020 & 2021 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Community Development Loans

The bank has made a low level of community development loans. During the evaluation period, Firsttrust originated only one community development loan for \$21,150, which was a PPP loan to a school located in a low-income census tract. At the prior evaluation, the bank made no community development loans in this assessment area.

INVESTMENT TEST

Firsttrust is rated "Low Satisfactory" in the Investment Test for the state of PA. The bank's adequate performance in the Investment and Grant Activity and Responsiveness to Credit and Community Development Needs criteria supports this conclusion.

Investment and Grant Activity

Firsttrust has an adequate level of qualified community development investments and grants within the Lehigh County, PA assessment area, although rarely in a leadership position. Firsttrust made eight donations and EITCs totaling \$125,500 that specifically benefitted this assessment area. This includes five donations totaling \$25,500 and three EITCs totaling \$100,000. The bank did not maintain any prior period or new qualified investments this evaluation period that specifically

benefitted this assessment area. The following table illustrates the bank’s qualified investment activity by year and purpose.

Qualified Investments Lehigh County, PA Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Qualified Grants & Donations	2	6	3	20	0	0	0	0	5	26
EITCs	0	0	3	100	0	0	0	0	3	100
Total	2	6	6	120	0	0	0	0	8	126

Source: Bank Data

In addition to the qualified investments above, the bank maintained other qualified investments that collectively benefitted this assessment area and the Philadelphia PA-NJ Multistate MSA assessment area. These investments consist of seven new qualified investments totaling \$9.2 million, two prior period investments totaling \$2.1 million, and seven donations totaling \$543,500.

The following is a sample of donations and EITCs that specifically benefitted the Lehigh County, PA assessment area.

- In 2021, the bank donated \$4,000 to a nonprofit affordable housing organization that serves the Lehigh Valley. The organization emphasizes home ownership opportunities, particularly for minorities and low- and moderate-income persons. This donation supports the bank's affordable housing initiatives in the assessment area.
- During the evaluation period, the bank made three contributions totaling \$100,000 to eligible nonprofit educational entities in Lehigh County through the PA EITC Program. These educational facilities administer the contributions to support programs and needs geared to benefit low- and moderate-income students in the assessment area.

Responsiveness to Credit and Community Development Needs

The bank exhibits adequate responsiveness to credit and community economic development needs. Firsttrust continues to obtain and retain an adequate level of equity investments and make an adequate volume of donations and EITCs that primarily support community development services in the Lehigh County, PA assessment area. The qualified investments are assisting in addressing the needs identified by bank management and a community contact.

Community Development Initiatives

The bank rarely uses innovative and/or complex investments to support community development initiatives. Although investments include CRA-qualified, the MBSs, donations, and EITCs are not particularly innovative or complex.

SERVICE TEST

Firsttrust is rated “Low Satisfactory” in the Service Test for the state of PA. The bank’s adequate performance in the Accessibility of Delivery Systems, Reasonableness of Business Hours and Services, and Community Development Services criteria supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. Firsttrust operates one full-service branch, which contains an ATM, within the assessment area. The following table illustrates the branch and ATM distribution by tract income level.

Branch and ATM Distribution by Geography Income Level Lehigh County, PA Assessment Area								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	12	14.8	48,463	12.9	0	0.0	0	0.0
Moderate	16	19.8	77,772	20.8	0	0.0	0	0.0
Middle	30	37.0	131,938	35.2	1	100.0	1	100.0
Upper	23	28.4	116,384	31.1	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	81	100.0	374,557	100.0	1	100.0	1	100.0

Source: 2020 U.S. Census; Bank Data

Firsttrust does not operate a branch in any of the assessment area’s low- or moderate-income census tracts; however, the Cedar Crest branch in Allentown, PA is approximately two miles from a large demographic area containing low- and moderate-income census tracts in Allentown. This branch benefits the area’s low- and moderate-income census tracts and/or low- and moderate-income individuals. Additionally, the bank offers other alternative delivery systems that improve accessibility to its products and services for all geographies within the assessment area. These delivery systems include online, mobile, and telephone banking.

Changes in Branch Locations

To the extent changes have been made, the bank’s closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branch offices in this assessment area during the evaluation period.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences portions of the assessment areas, particularly in low- and moderate-income geographies and/or individuals. The sole branch office offers the same products and services as the other branch offices. The Cedar Crest (Allentown) branch hours are from 9:00 A.M. to 4 P.M. Monday through Friday, and 9:00 A.M. to 12:00 P.M. on Saturday. The drive-through facility provides extended business services until 5:00

P.M on Friday. The branch office has an ATM and provides night deposit and safe deposit box services.

Community Development Services

The bank provides an adequate level of community development services within the Lehigh County, PA assessment area. During the evaluation period, employees contributed eight instances of community development service activities. This performance slightly exceeded the bank’s performance at the previous evaluation period during which there were four instances of community development services. Examiners considered the effects of the COVID-19 pandemic when forming this conclusion. The following table illustrates the community development service activity by year and purpose.

Community Development Services Lehigh County, PA Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
11/2/2020 – 12/31/2020	0	0	0	0	0
2021	1	1	0	0	2
2022	1	1	0	0	2
1/1/2023 – 11/6/2023	1	2	1	0	4
Total	3	4	1	0	8
<i>Source: Bank Data</i>					

The following is a sample of community development services that benefit the assessment area.

- In 2023, a mortgage loan officer served as a board member of a community organization that offers a wide range of services for the Lehigh Valley. These services include the areas of food access and nutrition, start-up businesses, housing, neighborhood revitalization, and youth programs. While representing the bank, this loan officer provides financial expertise to the community development organization.
- In 2023, a branch manager served on the Executive Committee of a local Chamber of Commerce. The chamber provides business-to-business networking, community development opportunities, affinity programs, and various training and resources for area businesses, particularly for new entrepreneurs. This bank manager provides financial expertise through their banking background to the organization.

STATE OF MARYLAND

CRA RATING FOR STATE OF MARYLAND: NEEDS TO IMPROVE

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Needs to Improve

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MARYLAND

The bank operates one full service branch office within the Towson, MD assessment area. The bank's operations in the assessment area represent 0.3 percent of its total in-assessment area lending (by number), 0.9 percent of total deposits, and 5.6 percent of total branches. As previously mentioned, the bank expanded its overall assessment area to include this assessment area with the opening of its Towson branch office in August 2020. Please refer to the overall Description of Assessment Areas section for additional information on this assessment area.

Economic and Demographic Data

For 2020 and 2021, the assessment area included 31 census tracts reflecting the following income designations according to the 2015 ACS:

- 0 low-income census tracts,
- 6 moderate-income census tracts,
- 13 middle-income census tracts,
- 11 upper-income census tracts, and
- 1 census tract with no income designation.

For 2022, the same assessment area included 32 census tracts reflecting the following income designations according to the 2020 Census data:

- 0 low-income census tracts,
- 7 moderate-income census tracts and
- 13 middle-income census tracts,
- 11 upper-income census tracts, and
- 1 census tract with no income designation.

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Towson, MD Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	21.9	40.6	34.4	3.1
Population by Geography	106,143	0.0	23.5	40.9	29.5	6.1
Housing Units by Geography	42,104	0.0	24.2	45.9	29.5	0.4
Owner-Occupied Units by Geography	23,250	0.0	18.1	43.0	38.9	0.0
Occupied Rental Units by Geography	15,395	0.0	31.9	51.7	15.6	0.8
Vacant Units by Geography	3,459	0.0	30.5	40.2	27.6	1.6
Businesses by Geography	15,437	0.0	20.2	40.3	36.7	2.8
Farms by Geography	187	0.0	23.5	34.8	41.7	0.0
Family Distribution by Income Level	22,721	19.2	17.1	22.4	41.3	0.0
Household Distribution by Income Level	38,645	24.3	18.4	17.2	40.2	0.0
Median Family Income - 12580 Baltimore-Columbia-Towson, MD MSA	\$104,637	Median Housing Value				\$308,009
Families Below Poverty Level	4.6%	Median Gross Rent				\$1,398

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

There are 42,104 housing units in the assessment area. Of these units, 55.2 percent are owner-occupied, 36.6 percent are rental occupied, and 8.2 percent are vacant. As previously stated, the geographic distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. The above table shows that 18.1 percent of owner-occupied housing units are located in moderate-income census tracts. This distribution reflects the opportunity banks have to originate home mortgage loans in moderate-income census tracts in the assessment area.

The 2020, 2021, and 2022 FFIEC-updated MFI data to analyze home mortgage loans under the borrower profile criterion for the Towson, MD assessment area is as follows:

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Baltimore-Columbia-Towson, MD MSA Median Family Income (12580)				
2020 (\$104,000)	<\$52,000	\$52,000 to <\$83,200	\$83,200 to <\$124,800	≥\$124,800
2021 (\$105,100)	<\$52,550	\$52,550 to <\$84,080	\$84,080 to <\$126,120	≥\$126,120
2022 (\$116,100)	<\$58,050	\$58,050 to <\$92,880	\$92,880 to <\$139,320	≥\$139,320

Source: FFIEC

According to 2022 D&B data, there were 15,437 non-farm businesses in the assessment area. These businesses have the following GAR characteristics:

- 89.6 percent had GARs of \$1.0 million or less;
- 2.8 percent had GARs of more than \$1.0 million; and

- 7.6 percent had unreported GARs.

Service industries represent the largest share of total businesses in the assessment area at 39.3 percent, followed by non-classifiable establishments (29.7 percent), finance, insurance, and real estate (11.0 percent), and retail trade (8.6 percent). Most businesses have four or fewer employees (56.4 percent) and operate at a single location (92.5 percent). This information reflects the potential demand for, and the opportunity to originate, small business loans in the assessment area.

According to county government records, several of the top employers in Baltimore County include Social Security Administration and Centers for Medicare and Medicaid Services, Community College of Baltimore County, MedStar Franklin Square Hospital, Towson University, and University of Maryland, Baltimore County.

Competition

The bank's assessment area reflects a moderate competitive market for financial services. According to the June 30, 2023 FDIC Deposit Market Share Data, 25 financial institutions operated 54 full-service offices in the assessment area. Of these institutions, Firsttrust ranked 23rd with a 0.1 percent deposit market share and ranked 24th with a 0.6 percent branch market share. The top three institutions based on deposit market share included Bank of America, NA (21.7 percent); Manufacturers and Traders Trust Company (16.6 percent); and CFG Bank (16.2 percent).

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the assessment area. Based on 2022 peer mortgage data, 257 lenders originated or purchased 2,694 home mortgage loans. Of these lenders, Firsttrust ranked 104th by number of originations and purchases capturing 0.2 percent of total market share. The top three mortgage lenders in the assessment area included Truist Bank (5.9 percent); Primary Residential Mortgage, Inc. (4.6 percent); and Rocket Mortgage (4.2 percent).

There is also a high level of competition for small business loans among lenders in Baltimore County. Based on 2021 peer small business data, 149 lenders originated or purchased 25,463 small business loans. Of these lenders, Firsttrust ranked 37th by number of originations and purchases capturing 0.2 percent of total market share. The top three small business lenders in Baltimore County included American Express National Bank (17.1 percent); Bank of America, NA (15.0 percent); and JPMorgan Chase Bank, NA (9.1 percent). (Examiners can only generate market share data on small business loans at the full county level.)

SCOPE OF EVALUATION – STATE OF MARYLAND

This portion of the evaluation considers activity within the Towson, MD assessment area. Please refer to the overall Scope of Evaluation section for information on products and timeframe reviewed. Of the three assessment areas, the bank's performance in this area carried less weight than the Philadelphia, PA-NJ Multistate MSA assessment area in determining the overall rating and conclusions, as this assessment area accounts for a smaller portion of the bank's lending, deposits,

and branches. Examiners used full-scope procedures to assess the bank's performance in this assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE STATE OF MARYLAND

LENDING TEST

Firsttrust is rated "Needs to Improve" in the Lending Test for the state of MD. The bank's poor performance in the Lending Activity, Geographic Distribution, and Borrower Profile criteria, along with its very poor performance in the Community Development Lending criterion, supports this conclusion.

Lending Activity

Lending levels reflect poor responsiveness to the Towson, MD assessment area credit needs considering the institution's size, loan portfolio composition, and competition level. The bank's poor performance in home mortgage and small business lending supports this conclusion.

Home Mortgage Loans

Within the assessment area, Firsttrust did not originate any home mortgage loans in 2020 and 2021; however, originated four home mortgage loans totaling \$1.3 million in 2022. For home mortgages originated and purchased in 2022, Firsttrust captured 0.2 percent of total market share by number of loans, ranking 104th among 257 lenders that made 2,694 loans in the assessment area. The top ranked lenders included Truist Bank; Primary Residential Mortgage, Inc.; and Rocket Mortgage.

Small Business Loans

Firsttrust originated ten small business loans totaling \$1.3 million in 2020, nine small business loans totaling \$1.5 million in 2021, and two small business loans totaling \$565,000 in 2022 in the assessment area. For small business loans originated and purchased in 2021, Firsttrust captured 0.2 percent of total market share by number of loans, ranking 37th among 149 small business loan reporters that made 25,463 loans in Baltimore County. The top ranked lenders included American Express National Bank; Bank of America, NA; and JPMorgan Chase Bank, NA.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the assessment area, particularly in moderate-income census tracts. The bank's poor performance of home mortgage and small business loans supports this conclusion. Examiners focused on the number of loans in moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor penetration throughout the assessment area. The bank did not originate any home mortgage loans in this assessment area in 2020

and 2021, and only four loans in 2022, including one loan in a moderate-income census tract and three loans in middle-income census tracts.

Small Business Loans

The geographic distribution of small business loans reflects poor penetration throughout the assessment area. As shown in the following table, the bank’s penetration in moderate-income census tracts included only one loan in 2020, two loans in 2021, and no loans in 2022.

Geographic Distribution of Small Business Loans Towson, MD Assessment Area						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	0.0	0	0.0	0	0.0
2022	0.0	--	0	0.0	0	0.0
Moderate						
2020	26.0	27.1	1	10.0	21	1.6
2021	27.1	27.2	2	22.2	118	7.9
2022	20.2	--	0	0.0	0	0.0
Middle						
2020	31.7	29.6	2	20.0	95	7.1
2021	32.1	33.5	1	11.1	520	35.0
2022	40.3	--	0	0.0	0	0.0
Upper						
2020	39.0	40.4	6	60.0	1,205	89.5
2021	37.8	36.5	6	66.7	847	57.0
2022	36.7	--	2	100.0	565	100.0
Not Available						
2020	3.4	2.9	1	10.0	26	1.9
2021	3.0	2.8	0	0.0	0	0.0
2022	2.8	--	0	0.0	0	0.0
Totals						
2020	100.0	100.0	10	100.0	1,347	100.0
2021	100.0	100.0	9	100.0	1,485	100.0
2022	100.0	--	2	100.0	565	100.0

Source: 2020, 2021, & 2022 D&B Data; Bank Data; 2020 & 2021 CRA Aggregate Data. "--" data not available.
Due to rounding, totals may not equal 100.0%

Borrower Profile

The distribution of borrowers reflects poor penetration among retail customers of different income levels and business customers of different sizes. Firsttrust's poor performance of home mortgage and small business lending supports this conclusion. Examiners focused on the number of home mortgage loans to low- and moderate-income borrowers and the number of small business loans to businesses with GAR of \$1.0 million or less.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is poor. The bank did not originate any home mortgage loans in this assessment area in 2020 and 2021, and only four loans in 2022, including two loans to low-income borrowers and two loans to upper-income borrowers.

Small Business Loans

The distribution of borrowers reflects poor penetration among businesses of different sizes. As shown in the following table, while the bank originated five loans to businesses with GAR of \$1.0 million or less in 2020, four loans to such businesses in 2021, and two loans to such businesses in 2022, the overall volume of lending was poor.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Towson, MD Assessment Area						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2020	86.8	43.9	5	50.0	155	11.5
2021	87.7	46.3	4	44.4	597	40.2
2022	89.6	--	2	100.0	565	100.0
>\$1,000,000						
2020	4.1	--	5	50.0	1,192	88.5
2021	3.5	--	2	22.2	618	41.6
2022	2.8	--	0	0.0	0	0.0
Revenue Not Available						
2020	9.1	--	0	0.0	0	0.0
2021	8.8	--	3	33.3	270	18.2
2022	7.6	--	0	0.0	0	0.0
Totals						
2020	100.0	100.0	10	100.0	1,347	100.0
2021	100.0	100.0	9	100.0	1,485	100.0
2022	100.0	--	2	100.0	565	100.0
<i>Source: 2020, 2021, & 2022 D&B Data: Bank Data: 2020 & 2021 CRA Aggregate Data. "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Community Development Loans

During the evaluation period, Firsttrust did not originate any community development loans in this assessment area.

INVESTMENT TEST

Firsttrust is rated "Needs to Improve" in the Investment Test for the state of MD. The bank's poor performance in the Investment and Grant Activity, Responsiveness to Credit and Community Development Needs, and Innovative or Complexity of Qualified Investments criteria supports this conclusion.

Investment and Grant Activity

Firsttrust has a poor level of qualified community development investments and grants within the Towson, MD assessment area. Firsttrust only made four donations totaling \$14,370 that specifically benefitted this assessment area. The bank did not maintain any prior period or new qualified investments that specifically benefitted the assessment area. Since Firsttrust did not adequately respond to community development needs and opportunities within the Towson, MD assessment

area, examiners did not consider donations the bank made to organizations outside this assessment area, but within the broader statewide or regional area.

The following are the donations that specifically benefitted the Towson, MD assessment area.

- In 2021 and 2022, the bank donated a total of \$9,370 to a nonprofit organization that serves Baltimore County, which includes Towson, MD. The nonprofit provides specialized services and programs to persons with intellectual and developmental disabilities. These donations support community development services in the assessment area.
- In 2021, the bank's Foundation donated \$3,000 to a nonprofit economic development organization in Towson, MD. The organization promotes investments in Towson through development and revitalization of property and infrastructure for the benefit of the greater Towson community. This donation supports the bank's economic development initiatives in the assessment area.
- In 2021, the bank provided \$2,000 in scholarship funds for qualified low- and moderate-income students in the Baltimore County public schools, which includes Towson, MD. This donation enhances community development services in the assessment area.

Responsiveness to Credit and Community Development Needs

The bank exhibits poor responsiveness to credit and community economic development needs. Firsttrust made no new qualified investments and provided a poor volume of donations within the Towson, MD assessment area.

Community Development Initiatives

The bank rarely uses innovative and/or complex investments to support community development initiatives. Although investments include CRA-qualified, the MBSs, donations, and EITCs are not particularly innovative or complex.

SERVICE TEST

Firsttrust is rated "Low Satisfactory" in the Service Test for the state of MD. The bank's adequate performance in the Accessibility of Delivery Systems, Reasonableness of Business Hours and Services, and Community Development Services criteria supports this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the assessment area. Firsttrust operates one full-service branch, which contains an ATM, within the assessment area. The following table illustrates the branch and ATM distribution by tract income level.

Branch and ATM Distribution by Geography Income Level Towson, MD Assessment Area								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	7	21.9	24,914	23.5	0	0.0	0	0.0
Middle	13	40.6	43,399	40.9	0	0.0	0	0.0
Upper	11	34.4	31,306	29.5	1	100.0	1	100.0
NA	1	3.1	6,524	6.1	0	0.0	0	0.0
Total	32	100.0	106,143	100.0	1	100.0	1	100.0

Source: 2020 U.S. Census; Bank Data

Firstrust does not operate a branch in any of the assessment area’s moderate-income census tracts; however, the Towson branch is less than a mile from a moderate-income census tract. This branch benefits that moderate-income census tract and/or the assessment area’s low- or moderate-income individuals. Additionally, the bank offers other alternative delivery systems that improve accessibility to its products and services for all geographies within the assessment area. These delivery systems include online, mobile, and telephone banking.

Changes in Branch Locations

To the extent changes have been made, the bank’s closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branch offices in this assessment area during the evaluation period. The bank opened its Towson branch office just prior to the evaluation period in August 2020.

Reasonableness of Business Hours and Services

Business hours and services do not vary in a way that inconveniences portions of the assessment areas, particularly in moderate-income geographies and/or to low- and moderate-income individuals. The sole branch office offers the same products and services as the other branch offices. The Towson branch and drive-through hours are from 9:00 A.M. to 5 P.M. Monday through Friday. The bank closes this branch on Saturdays and Sundays. The branch office has an ATM and provides night deposit and safe deposit box services.

Community Development Services

The bank provides an adequate level of community development services within the Towson, MD assessment area. During the evaluation period, employees contributed eight instances of community development service activities. Examiners considered the bank’s recent expansion into the Baltimore area and the effects of the COVID-19 pandemic when forming this conclusion. The following table illustrates the community development service activity by year and purpose.

Community Development Services Towson, MD Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
11/2/2020 – 12/31/2020	0	0	0	0	0
2021	0	0	0	0	0
2022	0	3	1	0	4
1/1/2023 – 11/6/2023	0	3	1	0	4
Total	0	6	2	0	8
<i>Source: Bank Data</i>					

The following is a sample of community development services that benefit the assessment area.

- In 2022 and 2023, a bank officer served as a Board member of a foundation. The foundation provides financial support to local nonprofit organizations that benefit children and youth of low- and moderate-income families who are seeking education, social programs, or health assistance. As a board member, the employee provides financial expertise to the community service organization.
- In 2022 and 2023, a bank officer served as a Board member of a local chamber of commerce. The chamber’s mission is to support and accelerate the local economy through effective advocacy, business and leadership development, and professional community connections. The organization also focusses on the sustaining, retaining, and expanding of small businesses in the community. The employee provides financial expertise to this organization that supports economic development in the assessment area.
- In 2022 and 2023, a bank officer provided financial literacy to a youth program organized through the Baltimore City Mayor's Office of Employment Development, Youth Services Division. The organization collaborates with youth and employers to create employment opportunities that will enhance youth job skills. The bank employee enhances community development services by providing financial education to the youth in the assessment area.

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
 - i. The proportion of the bank's lending in the bank's assessment area(s);
 - ii. The dispersion of lending in the bank's assessment areas(s); and
 - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
 - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
 - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
 - iii. Small business and small farm loans by loan amount at origination; and
 - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

SCOPE OF EVALUATION

Firsttrust Savings Bank	
Scope of Examination: Full-scope reviews were performed on the following assessment areas within the noted rated areas: Philadelphia, PA-NJ Multistate MSA Assessment Area Lehigh County, PA Assessment Area Baltimore County, MD Assessment Area	
Time Period Reviewed:	11/2/2020 to 11/6/2023
Products Reviewed: Home Mortgage Loans: 01/01/2020 to 12/31/2022 Small Business Loans: 01/01/2020 to 12/31/2022 Other Real Estate Secured Loans: 01/01/2020 to 12/31/2022	

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
Philadelphia-Camden Multistate MSA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Pennsylvania	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Maryland	Needs to Improve	Needs to Improve	Low Satisfactory	Satisfactory

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/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 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.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



CRA

PUBLIC FILE

BOOK 2 of 3



CRA Public File

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NOTE

No written comments as of December 31, 2024.

NOTE

No written comments as of December 31, 2023.

NOTE

No written comments as of December 31, 2022.



BRANCH OFFICE OPENINGS & CLOSINGS

JANUARY 1, 2024 – DECEMBER 31, 2024

<u>DATE</u>	<u>BRANCH</u>	<u>ADDRESS</u>	<u>CENSUS TRACT</u>	<u>MSA</u>
<u>OPENED</u>	None			
<u>CLOSED</u>	None			

JANUARY 1, 2023 – DECEMBER 31, 2023

<u>DATE</u>	<u>BRANCH</u>	<u>ADDRESS</u>	<u>CENSUS TRACT</u>	<u>MSA</u>
<u>OPENED</u>	None			
<u>CLOSED</u>	None			

JANUARY 1, 2022 – DECEMBER 31, 2022

<u>DATE</u>	<u>BRANCH</u>	<u>ADDRESS</u>	<u>CENSUS TRACT</u>	<u>MSA</u>
<u>OPENED</u>	None			
<u>CLOSED</u>	Flourtown	1816 Bethlehem Pike Flourtown, PA 19031	2013	33874

NOTE

No Award/Citations as of December 31, 2024.

BRANCH OFFICES
As of December 31, 2024

BRANCH#	BRANCH	ADDRESS	CITY	STATE_ABR	ZIP	STATE	MSA	COUNTY	CENSUSTRAC	PERCMEDIAN	TRACT INCOME
3	MFC	1515 Market St.	Philadelphia	PA	19102	42	37964	101	0004.03	365.1889	Upper
6	Cedar Crest	1403 N. Cedar Crest Blvd.	Allentown	PA	18104	42	10900	077	0060.01	106.2875	Middle
7	Krewstown	9309 Krewstown Road	Philadelphia	PA	19115	42	37964	101	0344.00	133.6995	Upper
9	Rittenhouse	1901 Walnut St.	Philadelphia	PA	19103	42	37964	101	0007.01	292.4538	Upper
12	South	1332 Point Breeze Ave.	Philadelphia	PA	19146	42	37964	101	0031.00	102.8266	Middle
13	Ardmore	107 Coulter Ave.	Ardmore	PA	19003	42	33874	091	2054.02	213.0479	Upper
16	Southampton	361 Second Street Pike	Southampton	PA	18966	42	33874	017	1015.03	86.4144	Middle
19	555	555 City Ave.	Bala Cynwyd	PA	19004	42	33874	091	2043.00	90.6898	Middle
20	Gladwyne	351 Conshohocken State Rd.	Gladwyne	PA	19035	42	33874	091	2048.00	213.0479	Upper
22	Whitemarsh	15 E. Ridge Pike	Conshohocken	PA	19428	42	33874	091	2031.03	152.1658	Upper
24	Doylestown	288 S. Main St.	Doylestown	PA	18901	42	33874	017	1047.03	107.9441	Middle
28	Cherry Hill	108 Marlton Pike East	Cherry Hill	PA	08034	34	15804	007	6034.00	97.0244	Middle
32	Jenkintown	261 Old York Road	Jenkintown	PA	19046	42	33874	091	2019.02	96.7728	Middle
33	Bryn Mawr	725 West Lancaster Avenue	Bryn Mawr	PA	19010	42	33874	091	2051.00	132.2417	Upper
35	Newtown	11 Durham Road	Newtown	PA	18940	42	33874	017	1052.03	125.2137	Upper
36	Horsham	1 Walnut Grove Drive	Horsham	PA	19044	42	33874	091	2005.07	106.1869	Middle
37	Bustleton	7918 Bustleton Ave	Philadelphia	PA	19152	42	37964	101	0334.00	89.8858	Middle
38	Towson	32 West Pennsylvania Avenue	Towson	MD	21204	24	12580	005	4907.03	133.3553	Upper

Branch Hours & Services

BR #	BRANCH	County	Address	Phone No.	Lobby Hours	Drive-Thru Hours	Full Service	ATM	Night Deposit	SDep Box
16	SOUTHAMPTON	Bucks	Pike Plaza 361 Second Street Pike Southampton, PA 18966	(215) 355-7551	M-F 9-4, Sat 9-12	M-F 9-5, Sat 9-12	X	X	X	
24	DOYLESTOWN	Bucks	288 S. Main Street Doylestown, PA 18901	(215) 340-0069	M-F 9-4, Sat 9-12	M-Th 9-4, F 9-6, Sat 9-12	X	X	X	
35	NEWTOWN	Bucks	Goodnoe's Corner 11 Durham Road Newtown, PA 18940	(215) 497-0555	M-F 9-4, Sat 9-12	M-Th 9-4, F 9-5, Sat 9-12	X	X	X	
28	CHERRY HILL	Camden	108 Marlton Pike Cherry Hill, NJ 08034	(856)596-5965	M-F 9-4, Sat 9-12	M-Th 9-4, F 9-5, Sat 9-12	X	X	X	Moved from Marlton to Ch
6	CEDAR CREST	Lehigh	1403 N. Cedar Crest Blvd. Allentown, PA 18104	(610) 437-6815	M-F 9-4, Sat 9-12	M-Th 9-4, F 9-5, Sat 9-12	X	X	X	
13	ARDMORE	Montgomery	107 Coulter Avenue Ardmore, PA 19003	(610) 649-1300	M-Th 9-4, F 9-5, Sat 9-12		X	X	X	
19	555	Montgomery	555 City Avenue Bala Cynwyd, PA 19004	(610) 617-4555	M-F 9-5		X	X	X	
20	GLADWYNE	Montgomery	351 Conshohocken State Rd. Gladwyne, PA 19035	(610) 649-9400	M-Th 9-4, F 9-5, Sat 9-12		X	X	X	
22	WHITEMARSH	Montgomery	15 E. Ridge Pike Conshohocken, PA 19428	(610) 941-9898	M-F 9-5, Sat 9-12	M-F 9-5, Sat 9-12	X	X	X	
32	JENKINTOWN	Montgomery	261 Old York Road Jenkintown, PA 19046	(215) 886-0100	M-F 9-4, Sat 9-12	M-F 9-5, Sat 9-12	X	X	X	
33	BRYN MAWR	Montgomery	725 W. Lancaster Avenue Bryn Mawr, PA 19010	(610) 519-2265	M-F 9-4, Sat 9-12	M-Th 9-4, F 9-5, Sat 9-12	X	X	X	
36	HORSHAM	Montgomery	1 Walnut Grove Drive Horsham, PA 19044	(215) 259-5121	M-F 9-4		X			
ATM	Jenkintown (the Pavilion)	Montgomery	261 Old York Road (Plaza) Jenkintown, PA 19046					X		
3	MFC	Philadelphia	16th and Market Streets 1515 Market Street Philadelphia, PA 19102	(215) 563-0900	M-F 8:30 to 4 (ATM M-Sun. 6AM to 8PM)		X	X	X	
7	KREWSTOWN	Philadelphia	Krewstown Shopping Center 9309 Krewstown Road Philadelphia, PA 19115	(215) 673-6673	M-F 9-4, Sat 9-12	M-F 9-5, Sat 9-12	X	X	X	
9	RITTENHOUSE	Philadelphia	19th and Walnut Streets Philadelphia, PA 19103	(215) 963-0744	M-F 8:30-4, Sat 9-12		X			X
12	SOUTH	Philadelphia	1332 Point Breeze Avenue Philadelphia, PA 19146	(215) 468-3300	M-F 9-4		X			
37	BUSTLETON AVE.	Philadelphia	7918 Bustleton Avenue Philadelphia, PA 19152	215-722-6566	M-F 9-4, Sat 9-12	M-F 9-5, Sat 9-12	X	X	X	Opened on 3/20/17
ATM	PATH	Philadelphia	1919 Cottman Avenue Philadelphia, PA 19111					X		Opened 12/23/24
ATM	Mayfair	Philadelphia	7345 Frankford Ave., Philadelphia, PA 19136					X		
38	Towson	Baltimore	32 W Pennsylvania Ave., Towson, MD 21204	410-560-8042	M-F 9-5	M-F 9-5	X	X	X	Opened on 8/10/20

All branches:

Sell money orders, bank checks

Process deposits, withdrawals, check cashing, loan, line of credit, credit card & mortgage payments

Open and close new accounts

Take credit card, residential mortgage loan applications, consumer loan and line of credit applications

Branches service existing safe deposit box rentals; however, are not opening new safe deposit boxes as of 8/14/23



To: **CRA Public File**
From: **Timothy Hill – Compliance Officer**
Date: **March 20, 2025**
Re: **Compliance Training**

To remain compliant with federal regulations, employees were assigned the courses below. Knowledge of laws and regulations are essential to protect our institution and its customers.

All Employees (to the extent not encompassed by training as described for the specific Teams and Departments listed below):

- Anti-Money Laundering/Bank Secrecy Act
- Beneficial Ownership
- Diversity Awareness
- Office of Foreign Assets Control
- Sexual Harassment
- Suspicious Activity Reporting

Specific Teams and Departments:

Account Services:

- Anti-Money Laundering/Bank Secrecy Act for Operations
- Diversity Awareness
- Electronic Funds Transfer Act - Regulation E
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Sexual Harassment
- Suspicious Activity Reporting

Business and Commercial Banking:

- Anti-Money Laundering/Bank Secrecy Act for Operations
- Beneficial Ownership
- CRA for Large Institutions
- Diversity Awareness
- Equal Credit Opportunity Act - Regulation B
- Flood Insurance
- Office of Foreign Assets Control
- Red Flags of Identify Theft
- Suspicious Activity Reporting
- Sexual Harassment
- Unfair Deceptive or Abusive Acts or Practices

Business and Commercial Credit (including SBA):

- Anti-Money Laundering/Bank Secrecy Act for Lending
- Bank Secrecy Act for Lenders
- Beneficial Ownership
- CRA for Large Institutions
- Diversity Awareness
- Equal Credit Opportunity Act
- Fair Lending Overview
- Flood Insurance
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Sexual Harassment
- Suspicious Activity Reporting
- Unfair Deceptive or Abusive Acts or Practices

Community Banking Managers and Universal Bankers:

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering for Customer Service Representatives
- Bank Secrecy Act
- Beneficial Ownership
- Community Reinvestment Act for Large Institutions



- Currency Transaction
- Customer Identification Program (CIP)
- Diversity Awareness
- Electronic Funds Transfer Act - Regulation E
- Equal Credit Opportunity Act - Regulation B
- Expedited Funds Availability Act - Regulation CC
- Fair Credit Reporting Act
- Fair Lending Overview
- FDIC Insurance
- Flood Insurance
- New Account Opening
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Right to Financial Privacy Act
- Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act)
- Safe Deposit Boxes
- Security of Customer Information Guidelines
- Suspicious Activity Reporting
- Sexual Harassment
- Truth in Lending Act - Regulation Z
- Truth in Savings Act - Regulation DD
- Unfair Deceptive or Abusive Acts or Practices

Commercial Services:

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Operations
- Beneficial Ownership
- Diversity Awareness
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Sexual Harassment
- Suspicious Activity Reporting

Commercial Services/ACH:

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Operations
- Beneficial Ownership
- Diversity Awareness
- Electronic Funds Transfer Act - Regulation E
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Sexual Harassment
- Suspicious Activity Reporting

Community Banking Operations:

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Operations
- Beneficial Ownership
- CRA for Large Institutions
- Customer Identification Program
- Diversity Awareness
- FDIC Insurance
- New Account Opening
- Office of Foreign Asset Control
- Red Flags of Identity Theft
- Security of Customer Information Guidelines
- Sexual Harassment
- Suspicious Activity Reporting
- Unfair Deceptive or Abusive Acts or Practices

Consumer Lending:

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Lenders
- Beneficial Ownership



- Diversity Awareness
- Equal Credit Opportunity Act - Regulation B
- Fair Lending Overview
- Flood Insurance
- HMDA - Regulation C
- Military Lending Act
- New Account Opening
- Office of Foreign Asset Control
- Real Estate Settlement Procedures Act - Regulation X
- Red Flags of Identity Theft
- Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act)
- Sexual Harassment
- Suspicious Activity Reporting
- Truth in Lending - Regulation Z
- Unfair Deceptive or Abusive Acts or Practices

Customer Care:

- Anti-Money Laundering/Bank Secrecy Act for Customer Service
- Beneficial Ownership
- Diversity Awareness
- Expedited Funds Availability Act - Regulation CC
- Equal Credit Opportunity Act - Regulation B
- Fair Lending
- Flood Insurance Overview – Front-end Employee
- Office of Foreign Assets Control
- Red Flags of Identify Theft
- Truth in Lending Act - Regulation Z
- Sexual Harassment
- Suspicious Activity Reporting
- Unfair Deceptive or Abusive Acts or Practices

Internal Audit:

- Anti-Money Laundering/Bank Secrecy Act
- Beneficial Ownership
- CRA for Large Institutions
- Consumer Installment Loan Compliance Overview
- Customer Identification Program
- Diversity Awareness
- Electronic Funds Transfer Act - Regulation E
- Fair and Accurate Credit Transactions Act
- Equal Credit Opportunity Act - Regulation B
- Fair Credit Reporting Act
- Fair Lending Overview
- Federal Regulation of Real Estate Appraisals
- Flood Insurance
- Gramm-Leach-Bliley Act
- Home Mortgage Disclosure Act - Regulation C
- Office of Foreign Assets Control
- Real Estate Settlement Procedures Act - Regulation X
- Red Flags of Identity Theft
- Sexual Harassment
- Suspicious Activity in Lending Act
- Truth in Lending Act - Regulation Z
- Truth in Savings Act - Regulation DD
- Unfair Deceptive or Abusive Acts or Practices

Loan Operations/Loan Administration:

- Anti-Money Laundering/Bank Secrecy Act
- Beneficial Ownership
- Diversity Awareness
- Flood Insurance
- Office of Foreign Asset Control
- Red Flags of Identify Theft
- Sexual Harassment
- Suspicious Activity Reporting



Marketing:

- Advertising Compliance
- Anti-Money Laundering/Bank Secrecy Act
- Diversity Awareness
- Gramm-Leach-Bliley Act (Privacy Opt-Out)
- Sexual Harassment
- Suspicious Activity Reporting
- Truth in Lending Act - Regulation Z (advertising rules)
- Truth in Savings Act - Regulation DD (advertising rules)
- Unfair Deceptive or Abusive Acts or Practices

Residential Mortgage (MLO's take UDAAP, other RM team members do not):

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Lenders
- Beneficial Ownership
- Borrower's Right to Privacy in a Mortgage Transaction
- Diversity Awareness
- Equal Credit Opportunity Act - Regulation B
- Fair Lending Overview
- Flood Insurance
- Home Mortgage Disclosure Act - Regulation C
- Homeowner's Protection Act (Private Mortgage Insurance)
- Office of Foreign Assets Control
- Real Estate Settlement Procedures Act - Regulation X
- Red Flags of Identity Theft
- Sexual Harassment
- Suspicious Activity Reporting
- Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act)
- Truth in Lending Act - Regulation Z
- Unfair Deceptive or Abusive Acts or Practices (UDAAP)

Operations Risk Management:

- Anti-Money Laundering/Bank Secrecy Act
- Beneficial Ownership
- Diversity Awareness
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Suspicious Activity Reporting
- Sexual Harassment

Operations Risk/Collections:

- Anti-Money Laundering/Bank Secrecy Act
- Beneficial Ownership
- Diversity Awareness
- Equal Credit Opportunity Act - Regulation B
- Fair and Accurate Credit Transactions Act
- Fair Credit Reporting Act
- Fair Debt Collection Practices Act
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Suspicious Activity Reporting
- Sexual Harassment
- Unfair Deceptive or Abusive Acts or Practices

Operations Risk/Researchers:

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Lenders
- Beneficial Ownership
- Diversity Awareness
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Suspicious Activity Reporting



- Sexual Harassment

Other Lenders (not Consumer Lending & Residential Mortgage):

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Lenders
- Beneficial Ownership
- Community Reinvestment Act for Large Institutions
- Diversity Awareness
- Equal Credit Opportunity Act - Regulation B
- Fair Lending Overview
- Flood Insurance (one REF employee does not take Flood-cleared per manager and compliance officer)
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Sexual Harassment
- Suspicious Activity Reporting
- Truth in Lending Act - Regulation Z

Tellers:

- Anti-Money Laundering/Bank Secrecy Act
- Anti-Money Laundering/Bank Secrecy Act for Tellers
- Beneficial Ownership
- Currency Transactions
- Customer Identification Program
- Diversity Awareness
- Expedited Funds Availability Act - Regulation CC
- FDIC Insurance
- Office of Foreign Assets Control
- Red Flags of Identity Theft
- Right to Financial Privacy Act
- Safe Deposit Boxes
- Security of Customer Information Guidelines
- Sexual Harassment
- Suspicious Activity Reporting

*Anyone with an NMLS ID registers for and takes SAFE Act training

A score of 80% was required for passing the exams. Administrative functionality provided by the Bank's third party training vendor is used to monitor training activity by Bank employees during the course of the year.

CRA PUBLIC FILE BROCHURE LISTING

As of March 10, 2025

Retail		
Revision Date	Brochure ID/ No.	Title
9/8/2022	51721i006 (X-510)	VISA Retail Debit Card & ATM Card: Cardholder Agreement and Disclosure Statement
7/6/2023	RAA1707	Retail Account Agreement, Funds Availability & Electronic Funds Transfer Agreement and Disclosure
10/15/2024	TSD20241015 / Miser Desktop	Truth in Savings Disclosure
10/15/2024	OPD20241015 / Miser Desktop	Overdraft Privilege Disclosure
9/1/2016	9/16 / Intranet and Miser Desktop	Safe Deposit Box: Rules and Regulations
10/15/2024	10152024 / Miser Desktop	Retail Banking Fee Schedule
10/31/2024	Rev. 10/2024 / Intranet and Miser Desktop	Privacy Disclosure
4/4/2024	n/a	Mortgage - Bridge Loan Flyer
3/20/2024	n/a	Mortgage - Buydown Options Flyer
4/2/2024	n/a	Mortgage - HerosFirst Flyer
10/24/2024	n/a	Mortgage - HomeFirst Flyer - Purchase Only
10/21/2024	n/a	Mortgage - HomeFirst Flyer - Refinance Only
4/4/2024	n/a	Mortgage - Hometown Mortgages General Flyer
3/20/2024	n/a	Mortgage - Keystone-Flex Flyer
1/12/2024	n/a	Mortgage - Long Term Rate Lock
12/12/2024	n/a	Mortgage - Home Prosper Mortgage Program (Grant and Closing cost assistance)
2/27/2025	n/a	Mortgage - Home Prosper Mortgage Program (1st Mortgage)
10/17/2024	n/a	Mortgage - Product Menu Flyer
1/31/2024	FT-1314-01312024	Direct Deposit by ClickSWITCH Terms of Use and E-Sign Consent
6/21/2021	ESD20210621	e-Sign Disclosure
6/9/2021		Online Statement Service Addendum and Disclosure
5/1/2023	RMAOBA2023.03.31	Retail Mobile and Online Banking

Commercial / Business

Revision Date	Brochure ID/ No.	Title
08/31/2019	MCAA20190831	Master Commercial Account Agreement
3/1/2024	Miser Desktop	Master Commercial Account Agreement Addendum
11/2/2023	STMS20231102	Summary of Treasury Management Services (eVersion Only - TM Use Only)
10/2022	R 10/22	Treasury Management Services Agreement (eVersion Only - TM Use Only)
10/2019	R 10/19	Third-Party Sender and Originator Agrmt (eVersion Only - TM Use Only)
Most recent always found here:	www.firsttrust.com/holiday-schedule	Electronic Funds Holiday Processing Schedule
8/24/2020	51720i005 (A0-31)	VISA Business Debit Card and ATM Card Cardholder Agreement
02/08/2024	CBFS20240208 / Miser Desktop	Commercial Banking Fee Schedule
1/2025	FirstFacts 20240930	Flyer - FirstFacts/Bank Info

Subsidiaries

Firsttrust Financial Resources

Revision Date	Brochure ID/ No.	Title
3/2024	N/A	Portfolio Services Program
3/2024	N/A	FFR Pricing Guidelines
3/2024		FFR Seminar Curriculum
3/2024		FFR Your Money Plan Educational Handout

Apex

Revision Date	Brochure ID/ No.	Title
12/2024	N/A	Generic Broker Flyer
10/2024	N/A	Apex EF Medical Guidelines Pricing Sheet
09/2024	N/A	Apex EF Vendor Guidelines
01/2025	N/A	Apex Generic Pricing Matrix
10/2024	N/A	EF - Broker Generic Handout

10/2024	N/A	CM- Firsttrust handout
10/2024	N/A	CM- External handout
02/2025	CODE-LGCM24-B	CM- Prospecting led gen brochure



CRA

PUBLIC FILE

BOOK 3 of 3



CRA Public File

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Book 1:

- *Performance Evaluation*

Book 2:

- *Written Comments*
- *Current Branches & Branches Opened/Closed*
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 - *Locations and Services Grid*
 - *Compliance Training Report by Human Resources*
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Book 3:

- *Consumer Loan Information*
- *Maps*
- *CRA Disclosure Statement*
 - *Branch & Home Office CRA Notices as posted*
 - *Current & Prior Years Data Reports by the FFIEC*
- *HMDA Disclosure Statement*
 - *HMDA Notice as posted*
 - *Current & Prior Years Disclosure Reports by the FFIEC*

Table E - Geographic Distribution of Home Mortgage Loans

Assessment Area: 2024-Baltimore County

Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low	1.9	0	0.0	0	0.0
Moderate	25.3	2	16.7	673	17.8
Middle	46.6	7	58.3	1,976	52.3
Upper	26.2	3	25.0	1,130	29.9
Not Available	0.0	0	0.0	0	0.0
Subtotal	100.0	12	100.0	3,779	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table E - Geographic Distribution of Home Mortgage Loans

Assessment Area: 2024-Camden County

Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low	7.9	0	0.0	0	0.0
Moderate	23.2	7	33.3	1,490	31.5
Middle	40.6	3	14.3	510	10.8
Upper	28.1	11	52.4	2,727	57.7
Not Available	0.2	0	0.0	0	0.0
Subtotal	100.0	21	100.0	4,727	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table E - Geographic Distribution of Home Mortgage Loans

Assessment Area: 2024-Lehigh County

Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low	4.8	13	17.3	2,634	14.8
Moderate	14.7	28	37.3	6,649	37.4
Middle	40.1	27	36.0	6,720	37.8
Upper	40.4	7	9.3	1,767	9.9
Not Available	0.0	0	0.0	0	0.0
Subtotal	100.0	75	100.0	17,770	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table E - Geographic Distribution of Home Mortgage Loans

Assessment Area: 2024-Philadelphia REMA-5 County

Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low	4.5	24	5.9	4,167	4.0
Moderate	19.7	78	19.1	15,821	15.0
Middle	37.9	142	34.8	32,690	31.1
Upper	37.1	158	38.7	51,044	48.5
Not Available	0.8	6	1.5	1,468	1.4
Subtotal	100.0	408	100.0	105,190	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table E - Geographic Distribution of Home Mortgage Loans

Assessment Area: Combined

Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low	4.5	37	7.2	6,801	5.2
Moderate	20.5	115	22.3	24,633	18.7
Middle	39.5	179	34.7	41,896	31.9
Upper	35.0	179	34.7	56,668	43.1
Not Available	0.6	6	1.2	1,468	1.1
Subtotal	100.0	516	100.0	131,466	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table I - Distribution of Home Mortgage Loans by Borrower Income Level

Assessment Area: 2024-Camden County

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	26.6	3	14.3	613	13.0
Moderate	18.5	2	9.5	231	4.9
Middle	20.9	2	9.5	498	10.5
Upper	34.0	14	66.7	3,385	71.6
Not Available	0.0	0	0.0	0	0.0
Subtotal	100.0	21	100.0	4,727	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table I - Distribution of Home Mortgage Loans by Borrower Income Level

Assessment Area: 2024-Lehigh County

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	23.4	12	16.0	2,008	11.3
Moderate	18.1	44	58.7	10,949	61.6
Middle	20.4	15	20.0	3,708	20.9
Upper	38.1	4	5.3	1,106	6.2
Not Available	0.0	0	0.0	0	0.0
Subtotal	100.0	75	100.0	17,770	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table I - Distribution of Home Mortgage Loans by Borrower Income Level

Assessment Area: 2024-Philadelphia REMA-5 County

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	22.2	45	11.0	5,831	5.5
Moderate	17.1	79	19.4	16,008	15.2
Middle	19.3	86	21.1	17,403	16.5
Upper	41.3	185	45.3	63,943	60.8
Not Available	0.0	13	3.2	2,005	1.9
Subtotal	100.0	408	100.0	105,190	100.0

*Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table I - Distribution of Home Mortgage Loans by Borrower Income Level**Assessment Area: Combined**

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	22.8	61	11.8	8,648	6.6
Moderate	17.6	125	24.2	27,188	20.7
Middle	20.0	106	20.5	22,381	17.0
Upper	39.7	211	40.9	71,243	54.2
Not Available	0.0	13	2.5	2,005	1.5
Subtotal	100.0	516	100.0	131,466	100.0

Source: 2020 ACS; Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2024

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
2024-Baltimore County	12	3,778,886.36	2.3	1.9	0.0	--	25.3	16.7	--	46.6	58.3	--	26.2	25.0	--	0.0	0.0	--
2024-Camden County	21	4,727,082.30	4.1	7.9	0.0	--	23.2	33.3	--	40.6	14.3	--	28.1	52.4	--	0.2	0.0	--
2024-Lehigh County	75	17,769,828.00	14.5	4.8	17.3	--	14.7	37.3	--	40.1	36.0	--	40.4	9.3	--	0.0	0.0	--
2024-Philadelphia REMA-5 County	408	105,190,164.45	79.1	4.5	5.9	--	19.7	19.1	--	37.9	34.8	--	37.1	38.7	--	0.8	1.5	--
Total	516	131,465,961.11	100.0	4.5	7.2	--	20.5	22.3	--	39.5	34.7	--	35.0	34.7	--	0.6	1.2	--

Source: 2020 ACS; Bank Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Workpaper O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Low-Income Tracts					
% of Owner-Occupied Housing Units	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % of Owner-Occupied Housing Units
4.5	37	7.2	6,800,836.74	5.2	1.6
4.5	37	7.2	6,800,836.74	5.2	1.6
Moderate-Income Tracts					
% of Owner-Occupied Housing Units	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % of Owner-Occupied Housing Units
20.5	115	22.3	24,633,095.13	18.7	1.1
20.5	115	22.3	24,633,095.13	18.7	1.1
Middle-Income Tracts					
% of Owner-Occupied Housing Units	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % of Owner-Occupied Housing Units
39.5	179	34.7	41,895,969.00	31.9	0.9
39.5	179	34.7	41,895,969.00	31.9	0.9
Upper-Income Tracts					
% of Owner-Occupied Housing Units	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % of Owner-Occupied Housing Units
35.0	179	34.7	56,668,417.00	43.1	1.0
35.0	179	34.7	56,668,417.00	43.1	1.0
Not Available-Income Tracts					
% of Owner-Occupied Housing Units	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % of Owner-Occupied Housing Units
0.6	6	1.2	1,467,643.24	1.1	1.9
0.6	6	1.2	1,467,643.24	1.1	1.9
Total Home Mortgage Loans					
Assessment Area:	#	% of Total	\$	% of Total	
2024-4 Areas Combined	516	100.0	131,465,961.11	100.0	
Total	516	100.0	131,465,961.11	100.0	

Source: 2020 ACS; Bank Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2024

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2024-Baltimore County	12	3,778,886.36	2.3	22.7	8.3	--	19.1	0.0	--	22.5	25.0	--	35.7	66.7	--	0.0	0.0	--
2024-Camden County	21	4,727,082.30	4.1	26.6	14.3	--	18.5	9.5	--	20.9	9.5	--	34.0	66.7	--	0.0	0.0	--
2024-Lehigh County	75	17,769,828.00	14.5	23.4	16.0	--	18.1	58.7	--	20.4	20.0	--	38.1	5.3	--	0.0	0.0	--
2024-Philadelphia REMA-5 County	408	105,190,164.45	79.1	22.2	11.0	--	17.1	19.4	--	19.3	21.1	--	41.3	45.3	--	0.0	3.2	--
Total	516	131,465,961.11	100.0	22.8	11.8	--	17.6	24.2	--	20.0	20.5	--	39.7	40.9	--	0.0	2.5	--

Source: 2020 ACS; Bank Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Workpaper P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

Low-Income Borrowers					
% Families	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % Families
22.8	61	11.8	8,648,393.81	6.6	0.5
22.8	61	11.8	8,648,393.81	6.6	0.5
Moderate-Income Borrowers					
17.6	125	24.2	27,188,445.87	20.7	1.4
17.6	125	24.2	27,188,445.87	20.7	1.4
Middle-Income Borrowers					
% Families	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % Families
20.0	106	20.5	22,381,379.07	17.0	1.0
20.0	106	20.5	22,381,379.07	17.0	1.0
Upper-Income Borrowers					
% Families	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % Families
39.7	211	40.9	71,242,892.36	54.2	1.0
39.7	211	40.9	71,242,892.36	54.2	1.0
Not Available-Income Borrowers					
% Families	# Bank Loans	% Bank Loans	\$ Bank Loans	% of \$ Bank Loans	% Bank Loans / % Families
0.0	13	2.5	2,004,850.00	1.5	0.0
0.0	13	2.5	2,004,850.00	1.5	0.0
Assessment Area:	Total Home Mortgage Loans				
2024-4 Areas Combined	#	% of Total	\$	% of Total	
Total	516	100.0	131,465,961.11	100.0	
	516	100.0	131,465,961.11	100.0	

Source: 2020 ACS; Bank Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Population demographic reports

Area Name: **2024-Baltimore County**

Activity Year: **2024**

Race/Ethnicity

Race/Ethnic Origin	Count (Non-Hispanic)	% Non-Hispanic	Hispanic	% Hispanic	Total	% Total Persons
American Indian or Alaska Native	1,942	0.24	1,585	2.58	3,527	0.41
Asian [1]	54,701	6.90	267	0.43	54,968	6.43
Asian Indian	13,143	1.66			13,143	1.54
Chinese	7,755	0.98			7,755	0.91
Filipino	7,046	0.89			7,046	0.82
Japanese	571	0.07			571	0.07
Korean	4,855	0.61			4,855	0.57
Vietnamese	1,745	0.22			1,745	0.20
Other Asian	15,179	1.91			15,179	1.78
Black or African American	252,724	31.87	3,069	4.99	255,793	29.93
Native Hawaiian or other Pacific Islander [2]	252	0.03	52	0.08	304	0.04
Native Hawaiian	171	0.02			171	0.02
Guamanian or Chamorro	0	0.00			0	0.00
Samoan	167	0.02			167	0.02
Other Pacific Islander	754	0.10			754	0.09
White	443,263	55.89	8,861	14.41	452,124	52.91
Other Race	40,161	5.06	47,658	77.50	87,819	10.28
Population	Count	%				
Total Persons	854,535	100.00				
Hispanic	61,492	7.20				
Minority	411,272	48.13				

[1] Aggregate Asian counts are inclusive of "Asian Indian", "Chinese", "Filipino", "Japanese", "Korean", "Vietnamese", and "Other Asian" as well as non-specific Asian races. Values in this line are not a sum of the specific Asian races below.

[2] Aggregate Native Hawaiian or other Pacific Islander counts are inclusive of "Native Hawaiian", "Guamanian or Chamorro", "Samoan", "Other Pacific Islander" as well as non-specific Native Hawaiian or other Pacific Islander races. Values in this line are not a sum of the specific Islander races below.

Data source: 2020 ACS US Census

Ethnicity

Ethnicity	Count	% Total Population
Hispanic/Latino [1]	61,492	7.20
Mexican	9,459	1.11
Puerto Rican	7,553	0.88
Cuban	1,546	0.18
Other Hispanic or Latino	52,637	6.16
Not Hispanic or Latino	793,043	92.80

[1] Aggregate Hispanic/Latino counts are inclusive of "Mexican", "Puerto Rican", "Cuban", "Other Hispanic or Latino" as well as non-specific Hispanic/Latino races. Values in this line are not a sum of the specific Hispanic/Latino ethnicities below.

Data source: 2020 ACS US Census

Age

Tract Income Level	Age Under 18		Age 18 or Older		Age 18 - 24		Age 25 - 44		Age 45 - 64		Age Over 65	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Low	7,378	4.12	22,034	3.39	2,365	3.24	9,252	4.30	6,690	3.06	3,727	2.62
Moderate	61,149	34.15	200,173	30.84	23,954	32.80	72,648	33.77	65,306	29.89	38,265	26.86
Middle	73,251	40.90	287,062	44.22	28,983	39.68	98,401	45.75	96,786	44.30	62,892	44.14
Upper	37,138	20.74	131,971	20.33	10,264	14.05	34,631	16.10	49,579	22.69	37,497	26.32
NA	170	0.09	7,867	1.21	7,475	10.23	174	0.08	124	0.06	94	0.07
Total	179,086	100.00	649,107	100.00	73,041	100.00	215,106	100.00	218,485	100.00	142,475	100.00

Data source: 2020 ACS US Census

Gender and Marital Status

Gender/Marital Status	Female	%	Male	%	Total	%
Divorced	43,680	11.75	27,556	8.55	71,236	10.27
Married, Spouse Absent	18,383	4.95	14,729	4.57	33,112	4.77
Married, Spouse Present	143,668	38.66	147,424	45.76	291,092	41.95
Married, Now Separated	8,882	2.39	5,690	1.77	14,572	2.10
Never Married	120,294	32.37	117,490	36.46	237,784	34.27
Widowed	36,754	9.89	9,312	2.89	46,066	6.64
Total	371,661	100.00	322,201	100.00	693,862	100.00

Data source: 2020 ACS US Census

Group Quarters Population

Household Characteristics	Count	%
Total Persons in Group Quarters	22,328	7.08
College Dormitories	12,676	4.02
Correctional Institutions	1,059	0.34
Homeless Shelters	0	0.00
Juvenile Institutions	275	0.09
Mental Hospital	0	0.00
Military Quarters	0	0.00
Nursing Homes	5,689	1.80
Other Institution	23	0.01
Other Non-Institution	2,606	0.83

Data source: 2020 ACS US Census

Population by Income Tract % Column

Tract Income Category	Total Population		% Non-His White	% Non-His Black	% Non-His Asian	% Non-His Am-Indian	% Hispanic Origin	% Non-His Other	% Total Minority
	Count	%							
Low	31,203	3.65	2.67	4.43	4.45	7.78	6.23	4.31	4.71
Moderate	266,356	31.17	22.18	44.99	21.13	47.99	46.78	32.37	40.86
Middle	365,996	42.83	42.48	44.04	49.88	34.91	34.50	42.57	43.20
Upper	180,067	21.07	31.56	5.15	22.64	8.86	11.26	19.05	9.77
Not Applicable	10,913	1.28	1.11	1.39	1.90	0.46	1.22	1.71	1.46

Total	854,535	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
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Data source: 2020 ACS US Census

Population by Income Tract % Row

Tract Income Category	Total Population	% Non-His White	% Non-His Black	% Non-His Asian	% Hispanic	% Non-His Am-Indian	% Non-His Other	% Total Minority	% Row Total
Low	31,203	37.97	35.89	7.81	12.28	0.48	5.54	62.03	100.00
Moderate	266,356	36.91	42.69	4.34	10.80	0.35	4.88	63.09	100.00
Middle	365,996	51.45	30.41	7.45	5.80	0.19	4.67	48.55	100.00
Upper	180,067	77.69	7.22	6.88	3.85	0.10	4.25	22.31	100.00
Not Applicable	10,913	44.91	32.26	9.51	6.88	0.08	6.30	55.09	100.00

Data source: 2020 ACS US Census

Household and Labor Characteristics

Household Characteristics	Count	%
Total Households	315,347	
Non-English Speaking	16,859	5.35
Female Headed Households	112,426	35.65
Female Headed Households Below Poverty Level	6,594	2.09
Wage/Salary	244,500	77.53
Self Employed	30,126	9.55
Social Security	99,523	31.56
Public Assistance	7,127	2.26
Retirement	75,743	24.02
Households Below the Poverty Level	27,811	8.82
Low Income Households	77,620	24.61
Moderate Income Households	56,482	17.91
Total Families	203,226	
Families Below Poverty Level	12,331	6.07
Low Income Families	46,192	22.73
Moderate Income Families	38,822	19.10
Labor Characteristics	Count	%
Unemployed Civilian Labor	22,293	3.33
Civilians Not in Labor Force	225,558	33.71
Employed/Armed Services	421,177	62.95
Median Family Income	100,790.36	
Median Household Income	84,992.87	

Data source: 2020 ACS US Census

Tract Characteristics

Tract Income Category	Count	%	Households	%	Total Rental	%
Low < 50%	8	3.65	11,931	3.78	8,596	7.45
Moderate 50 - 79.99%	68	31.05	98,668	31.29	49,068	42.54
Middle 80 - 119.99%	92	42.01	139,805	44.33	46,247	40.10
Upper > = 120%	47	21.46	64,805	20.55	11,250	9.75
Not Applicable	4	1.83	138	0.04	177	0.15

Data source: 2020 ACS US Census

Housing Characteristics

Housing Characteristics	Count	%
Occupied Housing Units	315,347	93.41
Vacant Housing Units	22,233	6.59
Owner Occupied Units	208,376	61.73
Owner Occupied, 1-4 units in structure	195,939	58.04
Specified Owner-occupied housing units.	192,882	57.14
Single Family Units	253,076	74.97
Single Units Only (1 Unit, detached)	159,195	47.16
Rental Units	115,338	34.17
Mobile Homes	2,716	0.80
Other units	39	0.01
Number of units lacking plumbing, O/O	188	0.06
Number of units lacking plumbing, Rental	381	0.11
Units built prior to 1950	49,431	14.64
Owners w/Costs > 30% Income	44,260	13.11
Renters w/Costs > 30% Income	50,838	15.06
Median Year Built	1,943	
Median Gross Rent (Dollars)	\$1,313.00	
Median Value (Dollars)	\$281,148.86	

Data source: 2020 ACS US Census

Population demographic reports

Area Name: 2024-Camden County

Activity Year: 2024

Race/Ethnicity

Race/Ethnic Origin	Count (Non-Hispanic)	% Non-Hispanic	Hispanic	% Hispanic	Total	% Total Persons
American Indian or Alaska Native	692	0.16	1,776	1.86	2,468	0.47
Asian [1]	32,328	7.55	270	0.28	32,598	6.23
Asian Indian	8,666	2.02			8,666	1.66
Chinese	5,751	1.34			5,751	1.10
Filipino	5,146	1.20			5,146	0.98
Japanese	396	0.09			396	0.08
Korean	2,285	0.53			2,285	0.44
Vietnamese	4,086	0.95			4,086	0.78
Other Asian	3,119	0.73			3,119	0.60
Black or African American	95,135	22.22	5,974	6.27	101,109	19.31
Native Hawaiian or other Pacific Islander [2]	99	0.02	97	0.10	196	0.04
Native Hawaiian	81	0.02			81	0.02
Guamanian or Chamorro	0	0.00			0	0.00
Samoan	17	0.00			17	0.00
Other Pacific Islander	193	0.05			193	0.04
White	279,274	65.22	13,924	14.62	293,198	56.01
Other Race	20,702	4.83	73,214	76.86	93,916	17.94
Population	Count	%				
Total Persons	523,485	100.00				
Hispanic	95,255	18.20				
Minority	244,211	46.65				

[1] Aggregate Asian counts are inclusive of "Asian Indian", "Chinese", "Filipino", "Japanese", "Korean", "Vietnamese", and "Other Asian" as well as non-specific Asian races. Values in this line are not a sum of the specific Asian races below.

[2] Aggregate Native Hawaiian or other Pacific Islander counts are inclusive of "Native Hawaiian", "Guamanian or Chamorro", "Samoan", "Other Pacific Islander" as well as non-specific Native Hawaiian or other Pacific Islander races. Values in this line are not a sum of the specific Islander races below.

Data source: 2020 ACS US Census

Ethnicity

Ethnicity	Count	% Total Population
Hispanic/Latino [1]	95,255	18.20
Mexican	12,403	2.37
Puerto Rican	43,960	8.40
Cuban	2,197	0.42
Other Hispanic or Latino	45,489	8.69
Not Hispanic or Latino	428,230	81.80

[1] Aggregate Hispanic/Latino counts are inclusive of "Mexican", "Puerto Rican", "Cuban", "Other Hispanic or Latino" as well as non-specific Hispanic/Latino races. Values in this line are not a sum of the specific Hispanic/Latino ethnicities below.

Data source: 2020 ACS US Census

Age

Tract Income Level	Age Under 18		Age 18 or Older		Age 18 - 24		Age 25 - 44		Age 45 - 64		Age Over 65	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Low	21,590	18.71	53,229	13.60	7,653	18.33	20,576	15.28	16,964	12.52	8,036	10.12
Moderate	29,658	25.70	100,640	25.72	11,394	27.29	37,553	27.88	32,689	24.13	19,004	23.94
Middle	37,425	32.43	147,260	37.63	14,780	35.40	49,995	37.12	51,796	38.23	30,689	38.66
Upper	26,503	22.97	89,434	22.85	7,886	18.89	26,243	19.48	33,740	24.91	21,565	27.16
NA	230	0.20	752	0.19	39	0.09	334	0.25	282	0.21	97	0.12
Total	115,406	100.00	391,315	100.00	41,752	100.00	134,701	100.00	135,471	100.00	79,391	100.00

Data source: 2020 ACS US Census

Gender and Marital Status

Gender/Marital Status	Female	%	Male	%	Total	%
Divorced	24,546	11.09	15,289	7.62	39,835	9.44
Married, Spouse Absent	11,223	5.07	10,323	5.14	21,546	5.10
Married, Spouse Present	85,358	38.55	87,129	43.41	172,487	40.86
Married, Now Separated	6,010	2.71	5,004	2.49	11,014	2.61
Never Married	75,039	33.89	77,779	38.76	152,818	36.20
Widowed	19,257	8.70	5,165	2.57	24,422	5.79
Total	221,433	100.00	200,689	100.00	422,122	100.00

Data source: 2020 ACS US Census

Group Quarters Population

Household Characteristics	Count	%
Total Persons in Group Quarters	6,454	3.39
College Dormitories	500	0.26
Correctional Institutions	567	0.30
Homeless Shelters	0	0.00
Juvenile Institutions	183	0.10
Mental Hospital	0	0.00
Military Quarters	0	0.00
Nursing Homes	2,947	1.55
Other Institution	364	0.19
Other Non-Institution	1,893	0.99

Data source: 2020 ACS US Census

Population by Income Tract % Column

Tract Income Category	Total Population		% Non-His White	% Non-His Black	% Non-His Asian	% Non-His Am-Indian	% Hispanic Origin	% Non-His Other	% Total Minority
	Count	%							
Low	73,120	13.97	1.12	28.92	3.64	17.05	41.40	8.42	28.66
Moderate	135,286	25.84	22.68	31.46	26.82	31.94	28.45	28.96	29.46
Middle	193,064	36.88	44.37	29.51	34.51	36.99	22.62	39.02	28.31
Upper	120,913	23.10	31.80	9.59	34.87	14.02	7.09	23.30	13.15
Not Applicable	1,102	0.21	0.03	0.52	0.16	0.00	0.44	0.30	0.42

Total	523,485	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
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Data source: 2020 ACS US Census

Population by Income Tract % Row

Tract Income Category	Total Population	% Non-His White	% Non-His Black	% Non-His Asian	% Hispanic	% Non-His Am-Indian	% Non-His Other	% Total Minority	% Row Total
Low	73,120	4.27	37.63	1.61	53.94	0.16	2.38	95.73	100.00
Moderate	135,286	46.83	22.12	6.41	20.03	0.16	4.43	53.17	100.00
Middle	193,064	64.19	14.54	5.78	11.16	0.13	4.18	35.81	100.00
Upper	120,913	73.45	7.55	9.32	5.59	0.08	3.99	26.55	100.00
Not Applicable	1,102	6.62	44.83	4.81	37.84	0.00	5.72	93.38	100.00

Data source: 2020 ACS US Census

Household and Labor Characteristics

Household Characteristics	Count	%
Total Households	190,660	
Non-English Speaking	21,074	11.05
Female Headed Households	67,185	35.24
Female Headed Households Below Poverty Level	7,079	3.71
Wage/Salary	146,427	76.80
Self Employed	16,180	8.49
Social Security	62,830	32.95
Public Assistance	5,044	2.65
Retirement	40,079	21.02
Households Below the Poverty Level	24,102	12.64
Low Income Households	58,130	30.49
Moderate Income Households	30,930	16.22
Total Families	126,330	
Families Below Poverty Level	11,569	9.16
Low Income Families	33,623	26.62
Moderate Income Families	23,351	18.48
Labor Characteristics	Count	%
Unemployed Civilian Labor	17,773	4.39
Civilians Not in Labor Force	137,025	33.88
Employed/Armed Services	249,684	61.73
Median Family Income	92,271.58	
Median Household Income	78,221.74	

Data source: 2020 ACS US Census

Tract Characteristics

Tract Income Category	Count	%	Households	%	Total Rental	%
Low < 50%	17	13.18	25,827	13.55	16,761	24.22
Moderate 50 - 79.99%	34	26.36	51,043	26.77	23,265	33.61
Middle 80 - 119.99%	49	37.98	71,465	37.48	21,610	31.22
Upper > = 120%	28	21.71	41,866	21.96	7,410	10.71
Not Applicable	1	0.78	459	0.24	167	0.24

Data source: 2020 ACS US Census

Housing Characteristics

Housing Characteristics	Count	%
Occupied Housing Units	190,660	92.44
Vacant Housing Units	15,587	7.56
Owner Occupied Units	124,997	60.61
Owner Occupied, 1-4 units in structure	121,957	59.13
Specified Owner-occupied housing units.	119,115	57.75
Single Family Units	166,222	80.59
Single Units Only (1 Unit, detached)	112,976	54.78
Rental Units	69,213	33.56
Mobile Homes	1,351	0.66
Other units	29	0.01
Number of units lacking plumbing, O/O	300	0.15
Number of units lacking plumbing, Rental	258	0.13
Units built prior to 1950	51,991	25.21
Owners w/Costs > 30% Income	35,620	17.27
Renters w/Costs > 30% Income	34,082	16.52
Median Year Built	1,962	
Median Gross Rent (Dollars)	\$1,140.25	
Median Value (Dollars)	\$200,158.91	

Data source: 2020 ACS US Census

Population demographic reports

Area Name: **2024-Lehigh County**

Activity Year: **2024**

Race/Ethnicity

Race/Ethnic Origin	Count (Non-Hispanic)	% Non-Hispanic	Hispanic	% Hispanic	Total	% Total Persons
American Indian or Alaska Native	337	0.12	1,150	1.19	1,487	0.40
Asian [1]	13,725	4.94	216	0.22	13,941	3.72
Asian Indian	4,513	1.63			4,513	1.20
Chinese	2,320	0.84			2,320	0.62
Filipino	515	0.19			515	0.14
Japanese	293	0.11			293	0.08
Korean	1,177	0.42			1,177	0.31
Vietnamese	1,236	0.45			1,236	0.33
Other Asian	2,185	0.79			2,185	0.58
Black or African American	22,950	8.27	4,639	4.78	27,589	7.37
Native Hawaiian or other Pacific Islander [2]	91	0.03	59	0.06	150	0.04
Native Hawaiian	27	0.01			27	0.01
Guamanian or Chamorro	0	0.00			0	0.00
Samoan	0	0.00			0	0.00
Other Pacific Islander	112	0.04			112	0.03
White	227,994	82.14	16,511	17.02	244,505	65.28
Other Race	12,479	4.50	74,406	76.72	86,885	23.20
Population	Count	%				
Total Persons	374,557	100.00				
Hispanic	96,981	25.89				
Minority	146,563	39.13				

[1] Aggregate Asian counts are inclusive of "Asian Indian", "Chinese", "Filipino", "Japanese", "Korean", "Vietnamese", and "Other Asian" as well as non-specific Asian races. Values in this line are not a sum of the specific Asian races below.

[2] Aggregate Native Hawaiian or other Pacific Islander counts are inclusive of "Native Hawaiian", "Guamanian or Chamorro", "Samoan", "Other Pacific Islander" as well as non-specific Native Hawaiian or other Pacific Islander races. Values in this line are not a sum of the specific Islander races below.

Data source: 2020 ACS US Census

Ethnicity

Ethnicity	Count	% Total Population
Hispanic/Latino [1]	96,981	25.89
Mexican	6,031	1.61
Puerto Rican	48,399	12.92
Cuban	1,542	0.41
Other Hispanic or Latino	51,848	13.84
Not Hispanic or Latino	277,576	74.11

[1] Aggregate Hispanic/Latino counts are inclusive of "Mexican", "Puerto Rican", "Cuban", "Other Hispanic or Latino" as well as non-specific Hispanic/Latino races. Values in this line are not a sum of the specific Hispanic/Latino ethnicities below.

Data source: 2020 ACS US Census

Age

Tract Income Level	Age Under 18		Age 18 or Older		Age 18 - 24		Age 25 - 44		Age 45 - 64		Age Over 65	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Low	14,981	17.96	31,807	11.20	5,108	15.34	13,643	14.49	9,434	9.92	3,622	5.90
Moderate	17,882	21.44	57,208	20.15	7,870	23.64	21,763	23.11	17,382	18.27	10,193	16.61
Middle	26,272	31.50	105,186	37.04	12,347	37.09	33,236	35.30	34,514	36.28	25,089	40.89
Upper	24,261	29.09	89,741	31.61	7,964	23.92	25,520	27.10	33,805	35.53	22,452	36.59
NA	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total	83,396	100.00	283,942	100.00	33,289	100.00	94,162	100.00	95,135	100.00	61,356	100.00

Data source: 2020 ACS US Census

Gender and Marital Status

Gender/Marital Status	Female	%	Male	%	Total	%
Divorced	16,097	10.13	12,352	8.41	28,449	9.30
Married, Spouse Absent	7,932	4.99	5,558	3.78	13,490	4.41
Married, Spouse Present	67,762	42.63	69,618	47.38	137,380	44.91
Married, Now Separated	4,448	2.80	2,747	1.87	7,195	2.35
Never Married	48,470	30.49	52,693	35.86	101,163	33.07
Widowed	14,250	8.96	3,976	2.71	18,226	5.96
Total	158,959	100.00	146,944	100.00	305,903	100.00

Data source: 2020 ACS US Census

Group Quarters Population

Household Characteristics	Count	%
Total Persons in Group Quarters	7,688	5.49
College Dormitories	3,194	2.28
Correctional Institutions	687	0.49
Homeless Shelters	0	0.00
Juvenile Institutions	120	0.09
Mental Hospital	0	0.00
Military Quarters	0	0.00
Nursing Homes	2,671	1.91
Other Institution	86	0.06
Other Non-Institution	930	0.66

Data source: 2020 ACS US Census

Population by Income Tract % Column

Tract Income Category	Total Population		% Non-His White	% Non-His Black	% Non-His Asian	% Non-His Am-Indian	% Hispanic Origin	% Non-His Other	% Total Minority
	Count	%							
Low	48,463	12.94	3.95	24.52	3.81	22.55	32.83	11.01	26.92
Moderate	77,772	20.76	13.41	29.05	10.87	21.66	37.56	20.16	32.20
Middle	131,938	35.23	41.37	31.60	39.88	30.86	20.84	36.43	25.67
Upper	116,384	31.07	41.27	14.82	45.44	24.93	8.77	32.40	15.21
Not Applicable	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total	374,557	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
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Data source: 2020 ACS US Census

Population by Income Tract % Row

Tract Income Category	Total Population	% Non-His White	% Non-His Black	% Non-His Asian	% Hispanic	% Non-His Am-Indian	% Non-His Other	% Total Minority	% Row Total
Low	48,463	18.59	11.61	1.08	65.71	0.16	2.84	81.41	100.00
Moderate	77,772	39.31	8.57	1.92	46.84	0.09	3.24	60.69	100.00
Middle	131,938	71.48	5.50	4.15	15.32	0.08	3.45	28.52	100.00
Upper	116,384	80.85	2.92	5.36	7.31	0.07	3.47	19.15	100.00
Not Applicable	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00

Data source: 2020 ACS US Census

Household and Labor Characteristics

Household Characteristics	Count	%
Total Households	140,072	
Non-English Speaking	16,424	11.73
Female Headed Households	43,745	31.23
Female Headed Households Below Poverty Level	4,725	3.37
Wage/Salary	106,358	75.93
Self Employed	11,402	8.14
Social Security	47,487	33.90
Public Assistance	4,507	3.22
Retirement	31,179	22.26
Households Below the Poverty Level	15,462	11.04
Low Income Households	36,077	25.76
Moderate Income Households	23,527	16.80
Total Families	94,393	
Families Below Poverty Level	8,595	9.11
Low Income Families	22,084	23.40
Moderate Income Families	17,046	18.06
Labor Characteristics	Count	%
Unemployed Civilian Labor	11,834	4.02
Civilians Not in Labor Force	103,253	35.10
Employed/Armed Services	179,076	60.88
Median Family Income	80,904.79	
Median Household Income	68,743.80	

Data source: 2020 ACS US Census

Tract Characteristics

Tract Income Category	Count	%	Households	%	Total Rental	%
Low < 50%	12	14.81	15,149	10.82	11,798	22.86
Moderate 50 - 79.99%	16	19.75	29,031	20.73	16,245	31.47
Middle 80 - 119.99%	30	37.04	52,573	37.53	16,664	32.29
Upper > = 120%	23	28.40	43,319	30.93	6,907	13.38
Not Applicable	0	0.00	0	0.00	0	0.00

Data source: 2020 ACS US Census

Housing Characteristics

Housing Characteristics	Count	%
Occupied Housing Units	140,072	95.48
Vacant Housing Units	6,627	4.52
Owner Occupied Units	90,661	61.80
Owner Occupied, 1-4 units in structure	90,029	61.37
Specified Owner-occupied housing units.	87,056	59.34
Single Family Units	123,883	84.45
Single Units Only (1 Unit, detached)	71,855	48.98
Rental Units	51,614	35.18
Mobile Homes	2,819	1.92
Other units	22	0.01
Number of units lacking plumbing, O/O	190	0.13
Number of units lacking plumbing, Rental	334	0.23
Units built prior to 1950	41,771	28.47
Owners w/Costs > 30% Income	19,489	13.29
Renters w/Costs > 30% Income	24,037	16.39
Median Year Built	1,966	
Median Gross Rent (Dollars)	\$1,182.25	
Median Value (Dollars)	\$204,840.74	

Data source: 2020 ACS US Census

Population demographic reports

Area Name: 2024-Philadelphia REMA-5 County

Activity Year: 2024

Race/Ethnicity

Race/Ethnic Origin	Count (Non-Hispanic)	% Non-Hispanic	Hispanic	% Hispanic	Total	% Total Persons
American Indian or Alaska Native	5,098	0.13	6,733	1.67	11,831	0.28
Asian [1]	306,682	8.04	1,828	0.45	308,510	7.31
Asian Indian	89,940	2.36			89,940	2.13
Chinese	69,097	1.81			69,097	1.64
Filipino	14,084	0.37			14,084	0.33
Japanese	2,017	0.05			2,017	0.05
Korean	25,059	0.66			25,059	0.59
Vietnamese	25,254	0.66			25,254	0.60
Other Asian	48,566	1.27			48,566	1.15
Black or African American	874,068	22.91	23,321	5.79	897,389	21.27
Native Hawaiian or other Pacific Islander [2]	1,142	0.03	459	0.11	1,601	0.04
Native Hawaiian	599	0.02			599	0.01
Guamanian or Chamorro	0	0.00			0	0.00
Samoan	182	0.00			182	0.00
Other Pacific Islander	1,568	0.04			1,568	0.04
White	2,459,372	64.46	61,546	15.28	2,520,918	59.76
Other Race	168,896	4.43	308,986	76.70	477,882	11.33
Population	Count	%				
Total Persons	4,218,131	100.00				
Hispanic	402,873	9.55				
Minority	1,758,759	41.70				

[1] Aggregate Asian counts are inclusive of "Asian Indian", "Chinese", "Filipino", "Japanese", "Korean", "Vietnamese", and "Other Asian" as well as non-specific Asian races. Values in this line are not a sum of the specific Asian races below.

[2] Aggregate Native Hawaiian or other Pacific Islander counts are inclusive of "Native Hawaiian", "Guamanian or Chamorro", "Samoan", "Other Pacific Islander" as well as non-specific Native Hawaiian or other Pacific Islander races. Values in this line are not a sum of the specific Islander races below.

Data source: 2020 ACS US Census

Ethnicity

Ethnicity	Count	% Total Population
Hispanic/Latino [1]	402,873	9.55
Mexican	65,401	1.55
Puerto Rican	183,877	4.36
Cuban	10,374	0.25
Other Hispanic or Latino	199,642	4.73
Not Hispanic or Latino	3,815,258	90.45

[1] Aggregate Hispanic/Latino counts are inclusive of "Mexican", "Puerto Rican", "Cuban", "Other Hispanic or Latino" as well as non-specific Hispanic/Latino races. Values in this line are not a sum of the specific Hispanic/Latino ethnicities below.

Data source: 2020 ACS US Census

Age

Tract Income Level	Age Under 18		Age 18 or Older		Age 18 - 24		Age 25 - 44		Age 45 - 64		Age Over 65	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Low	78,400	8.77	208,605	6.46	33,459	8.96	78,410	7.02	63,388	5.87	33,348	5.05
Moderate	235,129	26.32	755,750	23.40	99,428	26.61	278,755	24.94	242,418	22.47	135,149	20.48
Middle	300,688	33.65	1,135,445	35.15	116,427	31.16	382,036	34.18	389,816	36.13	247,166	37.45
Upper	269,762	30.19	1,085,118	33.59	111,159	29.75	364,721	32.63	371,790	34.46	237,448	35.98
NA	9,509	1.06	45,281	1.40	13,123	3.51	13,723	1.23	11,550	1.07	6,885	1.04
Total	893,488	100.00	3,230,199	100.00	373,596	100.00	1,117,645	100.00	1,078,962	100.00	659,996	100.00

Data source: 2020 ACS US Census

Gender and Marital Status

Gender/Marital Status	Female	%	Male	%	Total	%
Divorced	174,990	9.65	117,745	7.18	292,735	8.47
Married, Spouse Absent	79,603	4.39	70,063	4.27	149,666	4.33
Married, Spouse Present	713,824	39.35	723,123	44.07	1,436,947	41.59
Married, Now Separated	42,120	2.32	30,047	1.83	72,167	2.09
Never Married	644,474	35.52	657,689	40.08	1,302,163	37.69
Widowed	159,242	8.78	42,097	2.57	201,339	5.83
Total	1,814,253	100.00	1,640,764	100.00	3,455,017	100.00

Data source: 2020 ACS US Census

Group Quarters Population

Household Characteristics	Count	%
Total Persons in Group Quarters	112,358	7.13
College Dormitories	53,037	3.37
Correctional Institutions	13,745	0.87
Homeless Shelters	0	0.00
Juvenile Institutions	1,482	0.09
Mental Hospital	0	0.00
Military Quarters	0	0.00
Nursing Homes	24,221	1.54
Other Institution	1,177	0.07
Other Non-Institution	18,696	1.19

Data source: 2020 ACS US Census

Population by Income Tract % Column

Tract Income Category	Total Population		% Non-His White	% Non-His Black	% Non-His Asian	% Non-His Am-Indian	% Hispanic Origin	% Non-His Other	% Total Minority
	Count	%							
Low	288,086	6.83	2.33	14.38	3.74	10.42	20.37	6.53	13.13
Moderate	996,570	23.63	15.31	42.92	21.69	33.13	32.98	25.78	35.26
Middle	1,461,385	34.65	38.04	27.94	37.07	32.15	27.05	33.81	29.90
Upper	1,412,471	33.49	43.52	12.07	36.70	22.38	16.64	32.89	19.45
Not Applicable	59,619	1.41	0.81	2.69	0.81	1.92	2.96	1.00	2.26

Total	4,218,131	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
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Data source: 2020 ACS US Census

Population by Income Tract % Row

Tract Income Category	Total Population	% Non-His White	% Non-His Black	% Non-His Asian	% Hispanic	% Non-His Am-Indian	% Non-His Other	% Total Minority	% Row Total
Low	288,086	19.86	43.63	3.98	28.49	0.18	3.83	80.14	100.00
Moderate	996,570	37.78	37.64	6.67	13.33	0.17	4.37	62.22	100.00
Middle	1,461,385	64.01	16.71	7.78	7.46	0.11	3.91	35.99	100.00
Upper	1,412,471	75.78	7.47	7.97	4.75	0.08	3.93	24.22	100.00
Not Applicable	59,619	33.38	39.42	4.16	20.03	0.16	2.83	66.62	100.00

Data source: 2020 ACS US Census

Household and Labor Characteristics

Household Characteristics	Count	%
Total Households	1,575,083	
Non-English Speaking	133,894	8.50
Female Headed Households	545,197	34.61
Female Headed Households Below Poverty Level	54,609	3.47
Wage/Salary	1,200,976	76.25
Self Employed	155,364	9.86
Social Security	489,973	31.11
Public Assistance	53,349	3.39
Retirement	318,282	20.21
Households Below the Poverty Level	201,240	12.78
Low Income Households	400,522	25.43
Moderate Income Households	244,563	15.53
Total Families	998,995	
Families Below Poverty Level	90,535	9.06
Low Income Families	222,135	22.24
Moderate Income Families	170,751	17.09
Labor Characteristics	Count	%
Unemployed Civilian Labor	133,814	4.02
Civilians Not in Labor Force	1,160,176	34.83
Employed/Armed Services	2,036,912	61.15
Median Family Income	96,971.63	
Median Household Income	78,533.06	

Data source: 2020 ACS US Census

Tract Characteristics

Tract Income Category	Count	%	Households	%	Total Rental	%
Low < 50%	71	6.76	105,646	6.71	62,830	10.75
Moderate 50 - 79.99%	245	23.33	368,963	23.42	178,082	30.47
Middle 80 - 119.99%	339	32.29	552,885	35.10	174,389	29.83
Upper > = 120%	352	33.52	531,312	33.73	161,043	27.55
Not Applicable	43	4.10	16,277	1.03	8,202	1.40

Data source: 2020 ACS US Census

Housing Characteristics

Housing Characteristics	Count	%
Occupied Housing Units	1,575,083	92.48
Vacant Housing Units	128,061	7.52
Owner Occupied Units	1,029,369	60.44
Owner Occupied, 1-4 units in structure	996,784	58.53
Specified Owner-occupied housing units.	967,763	56.82
Single Family Units	1,414,578	83.06
Single Units Only (1 Unit, detached)	623,091	36.58
Rental Units	584,546	34.32
Mobile Homes	14,883	0.87
Other units	401	0.02
Number of units lacking plumbing, O/O	2,225	0.13
Number of units lacking plumbing, Rental	2,482	0.15
Units built prior to 1950	582,584	34.21
Owners w/Costs > 30% Income	245,404	14.41
Renters w/Costs > 30% Income	254,111	14.92
Median Year Built	1,905	
Median Gross Rent (Dollars)	\$1,184.11	
Median Value (Dollars)	\$278,106.38	

Data source: 2020 ACS US Census

Population demographic reports

Area Name: **Combined**

Activity Year: **2024**

Race/Ethnicity

Race/Ethnic Origin	Count (Non-Hispanic)	% Non-Hispanic	Hispanic	% Hispanic	Total	% Total Persons
American Indian or Alaska Native	8,069	0.15	11,244	1.71	19,313	0.32
Asian [1]	407,436	7.67	2,581	0.39	410,017	6.87
Asian Indian	116,262	2.19			116,262	1.95
Chinese	84,923	1.60			84,923	1.42
Filipino	26,791	0.50			26,791	0.45
Japanese	3,277	0.06			3,277	0.05
Korean	33,376	0.63			33,376	0.56
Vietnamese	32,321	0.61			32,321	0.54
Other Asian	69,049	1.30			69,049	1.16
Black or African American	1,244,877	23.43	37,003	5.64	1,281,880	21.47
Native Hawaiian or other Pacific Islander [2]	1,584	0.03	667	0.10	2,251	0.04
Native Hawaiian	878	0.02			878	0.01
Guamanian or Chamorro	0	0.00			0	0.00
Samoan	366	0.01			366	0.01
Other Pacific Islander	2,627	0.05			2,627	0.04
White	3,409,903	64.17	100,842	15.36	3,510,745	58.80
Other Race	242,238	4.56	504,264	76.80	746,502	12.50
Population	Count	%				
Total Persons	5,970,708	100.00				
Hispanic	656,601	11.00				
Minority	2,560,805	42.89				

[1] Aggregate Asian counts are inclusive of "Asian Indian", "Chinese", "Filipino", "Japanese", "Korean", "Vietnamese", and "Other Asian" as well as non-specific Asian races. Values in this line are not a sum of the specific Asian races below.

[2] Aggregate Native Hawaiian or other Pacific Islander counts are inclusive of "Native Hawaiian", "Guamanian or Chamorro", "Samoan", "Other Pacific Islander" as well as non-specific Native Hawaiian or other Pacific Islander races. Values in this line are not a sum of the specific Islander races below.

Data source: 2020 ACS US Census

Ethnicity

Ethnicity	Count	% Total Population
Hispanic/Latino [1]	656,601	11.00
Mexican	93,294	1.56
Puerto Rican	283,789	4.75
Cuban	15,659	0.26
Other Hispanic or Latino	349,616	5.86
Not Hispanic or Latino	5,314,107	89.00

[1] Aggregate Hispanic/Latino counts are inclusive of "Mexican", "Puerto Rican", "Cuban", "Other Hispanic or Latino" as well as non-specific Hispanic/Latino races. Values in this line are not a sum of the specific Hispanic/Latino ethnicities below.

Data source: 2020 ACS US Census

Age

Tract Income Level	Age Under 18		Age 18 or Older		Age 18 - 24		Age 25 - 44		Age 45 - 64		Age Over 65	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Low	122,349	9.62	315,675	6.93	48,585	9.31	121,881	7.80	96,476	6.31	48,733	5.17
Moderate	343,818	27.04	1,113,771	24.45	142,646	27.34	410,719	26.30	357,795	23.42	202,611	21.48
Middle	437,636	34.42	1,674,953	36.78	172,537	33.07	563,668	36.10	572,912	37.49	365,836	38.79
Upper	357,664	28.13	1,396,264	30.66	137,273	26.31	451,115	28.89	488,914	32.00	318,962	33.82
NA	9,909	0.78	53,900	1.18	20,637	3.96	14,231	0.91	11,956	0.78	7,076	0.75
Total	1,271,376	100.00	4,554,563	100.00	521,678	100.00	1,561,614	100.00	1,528,053	100.00	943,218	100.00

Data source: 2020 ACS US Census

Gender and Marital Status

Gender/Marital Status	Female	%	Male	%	Total	%
Divorced	259,313	10.10	172,942	7.48	432,255	8.86
Married, Spouse Absent	117,141	4.56	100,673	4.36	217,814	4.47
Married, Spouse Present	1,010,612	39.38	1,027,294	44.46	2,037,906	41.79
Married, Now Separated	61,460	2.39	43,488	1.88	104,948	2.15
Never Married	888,277	34.61	905,651	39.20	1,793,928	36.78
Widowed	229,503	8.94	60,550	2.62	290,053	5.95
Total	2,566,306	100.00	2,310,598	100.00	4,876,904	100.00

Data source: 2020 ACS US Census

Group Quarters Population

Household Characteristics	Count	%
Total Persons in Group Quarters	148,828	6.70
College Dormitories	69,407	3.12
Correctional Institutions	16,058	0.72
Homeless Shelters	0	0.00
Juvenile Institutions	2,060	0.09
Mental Hospital	0	0.00
Military Quarters	0	0.00
Nursing Homes	35,528	1.60
Other Institution	1,650	0.07
Other Non-Institution	24,125	1.09

Data source: 2020 ACS US Census

Population by Income Tract % Column

Tract Income Category	Total Population		% Non-His White	% Non-His Black	% Non-His Asian	% Non-His Am-Indian	% Hispanic Origin	% Non-His Other	% Total Minority
	Count	%							
Low	440,872	7.38	2.38	13.66	3.83	10.86	23.94	6.55	14.05
Moderate	1,475,984	24.72	16.68	42.21	21.65	36.13	34.29	26.85	35.43
Middle	2,152,383	36.05	39.36	31.39	38.68	33.18	26.19	35.84	31.65
Upper	1,829,835	30.65	40.86	10.53	34.96	18.52	13.59	29.75	17.05
Not Applicable	71,634	1.20	0.73	2.21	0.88	1.33	2.00	1.01	1.83

Total	5,970,708	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
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Data source: 2020 ACS US Census

Population by Income Tract % Row

Tract Income Category	Total Population	% Non-His White	% Non-His Black	% Non-His Asian	% Hispanic	% Non-His Am-Indian	% Non-His Other	% Total Minority	% Row Total
Low	440,872	18.41	38.56	3.54	35.65	0.20	3.60	81.59	100.00
Moderate	1,475,984	38.53	35.60	5.98	15.25	0.20	4.41	61.47	100.00
Middle	2,152,383	62.35	18.16	7.32	7.99	0.12	4.03	37.65	100.00
Upper	1,829,835	76.14	7.16	7.79	4.88	0.08	3.94	23.86	100.00
Not Applicable	71,634	34.73	38.41	4.99	18.30	0.15	3.40	65.27	100.00

Data source: 2020 ACS US Census

Household and Labor Characteristics

Household Characteristics	Count	%
Total Households	2,221,162	
Non-English Speaking	188,251	8.48
Female Headed Households	768,553	34.60
Female Headed Households Below Poverty Level	73,007	3.29
Wage/Salary	1,698,261	76.46
Self Employed	213,072	9.59
Social Security	699,813	31.51
Public Assistance	70,027	3.15
Retirement	465,283	20.95
Households Below the Poverty Level	268,615	12.09
Low Income Households	572,349	25.77
Moderate Income Households	355,502	16.01
Total Families	1,422,944	
Families Below Poverty Level	123,030	8.65
Low Income Families	324,034	22.77
Moderate Income Families	249,970	17.57
Labor Characteristics	Count	%
Unemployed Civilian Labor	185,714	3.95
Civilians Not in Labor Force	1,626,012	34.61
Employed/Armed Services	2,886,849	61.44
Median Family Income	96,247.21	
Median Household Income	78,926.30	

Data source: 2020 ACS US Census

Tract Characteristics

Tract Income Category	Count	%	Households	%	Total Rental	%
Low < 50%	108	7.30	158,553	7.14	99,985	12.18
Moderate 50 - 79.99%	363	24.54	547,705	24.66	266,660	32.49
Middle 80 - 119.99%	510	34.48	816,728	36.77	258,910	31.55
Upper > = 120%	450	30.43	681,302	30.67	186,610	22.74
Not Applicable	48	3.25	16,874	0.76	8,546	1.04

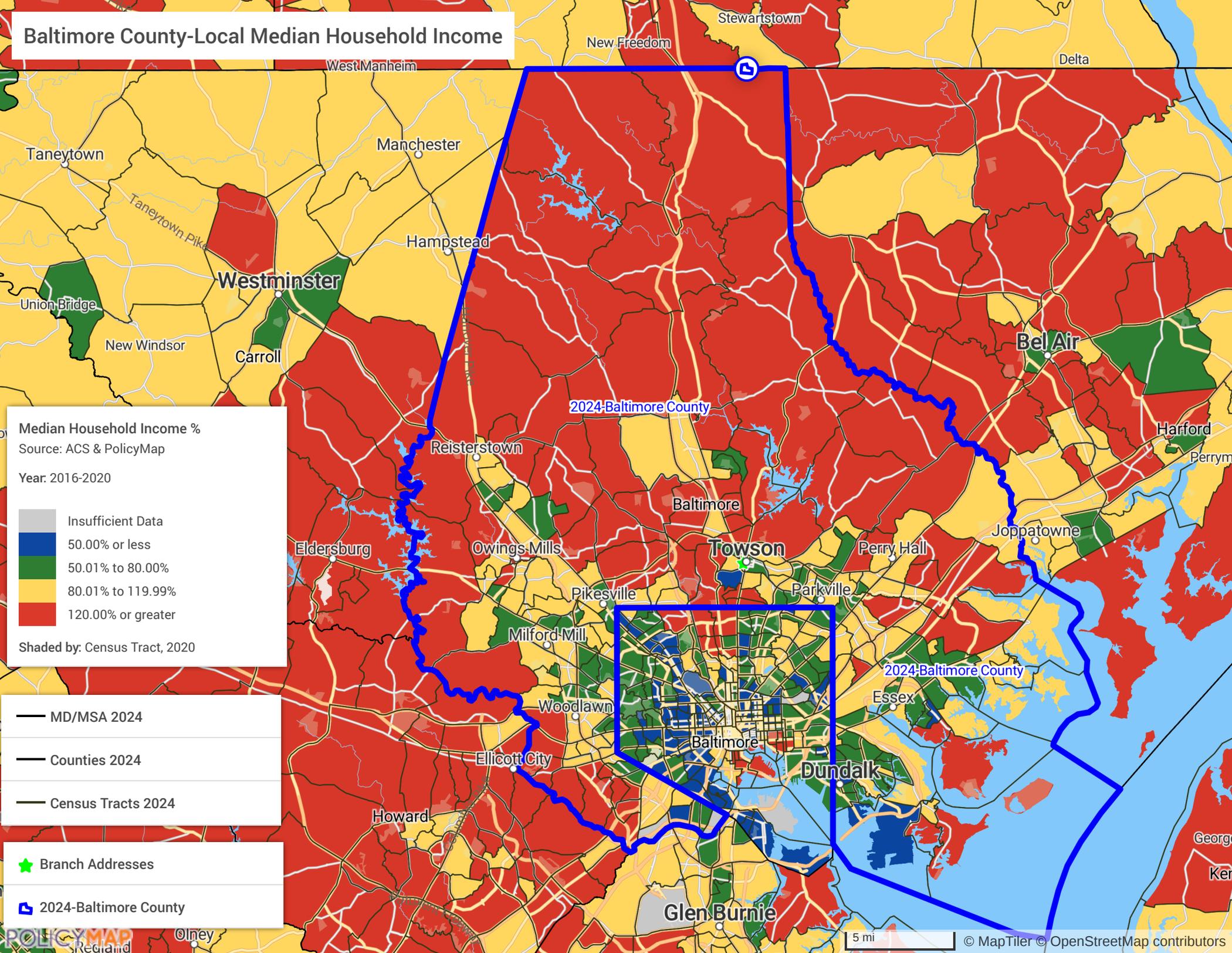
Data source: 2020 ACS US Census

Housing Characteristics

Housing Characteristics	Count	%
Occupied Housing Units	2,221,162	92.79
Vacant Housing Units	172,508	7.21
Owner Occupied Units	1,453,403	60.72
Owner Occupied, 1-4 units in structure	1,404,709	58.68
Specified Owner-occupied housing units.	1,366,816	57.10
Single Family Units	1,957,759	81.79
Single Units Only (1 Unit, detached)	967,117	40.40
Rental Units	820,711	34.29
Mobile Homes	21,769	0.91
Other units	491	0.02
Number of units lacking plumbing, O/O	2,903	0.12
Number of units lacking plumbing, Rental	3,455	0.14
Units built prior to 1950	725,777	30.32
Owners w/Costs > 30% Income	344,773	14.40
Renters w/Costs > 30% Income	363,068	15.17
Median Year Built	1,919	
Median Gross Rent (Dollars)	\$1,199.27	
Median Value (Dollars)	\$267,745.71	

Data source: 2020 ACS US Census

Baltimore County-Local Median Household Income



Median Household Income %
Source: ACS & PolicyMap
Year: 2016-2020

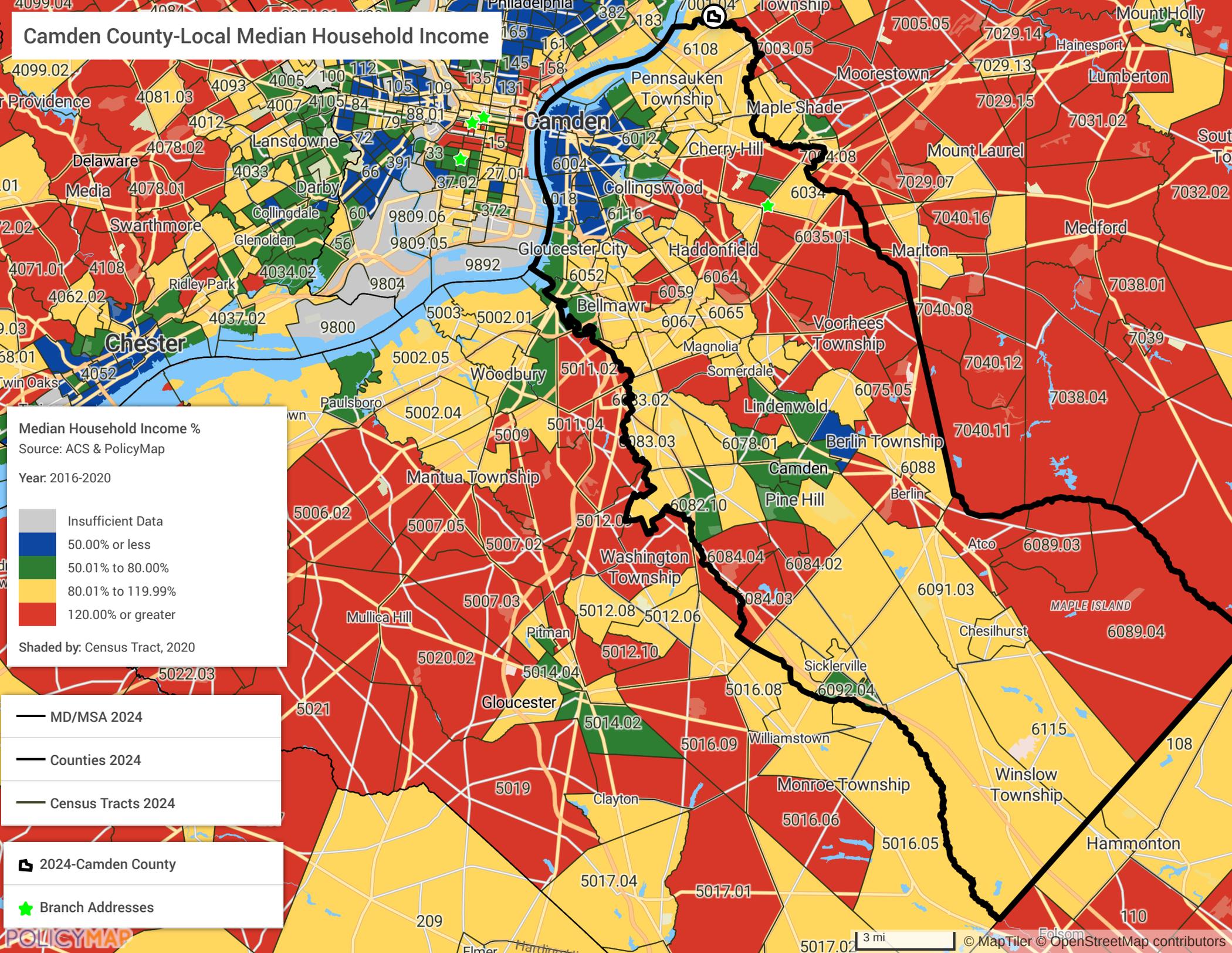
- Insufficient Data
- 50.00% or less
- 50.01% to 80.00%
- 80.01% to 119.99%
- 120.00% or greater

Shaded by: Census Tract, 2020

- MD/MSA 2024
- Counties 2024
- Census Tracts 2024

- Branch Addresses
- 2024-Baltimore County

Camden County-Local Median Household Income



Lehigh County-Local Median Household Income

Median Household Income %
Source: ACS & PolicyMap

Year: 2016-2020

- Insufficient Data
- 50.00% or less
- 50.01% to 80.00%
- 80.01% to 119.99%
- 120.00% or greater

Shaded by: Census Tract, 2020

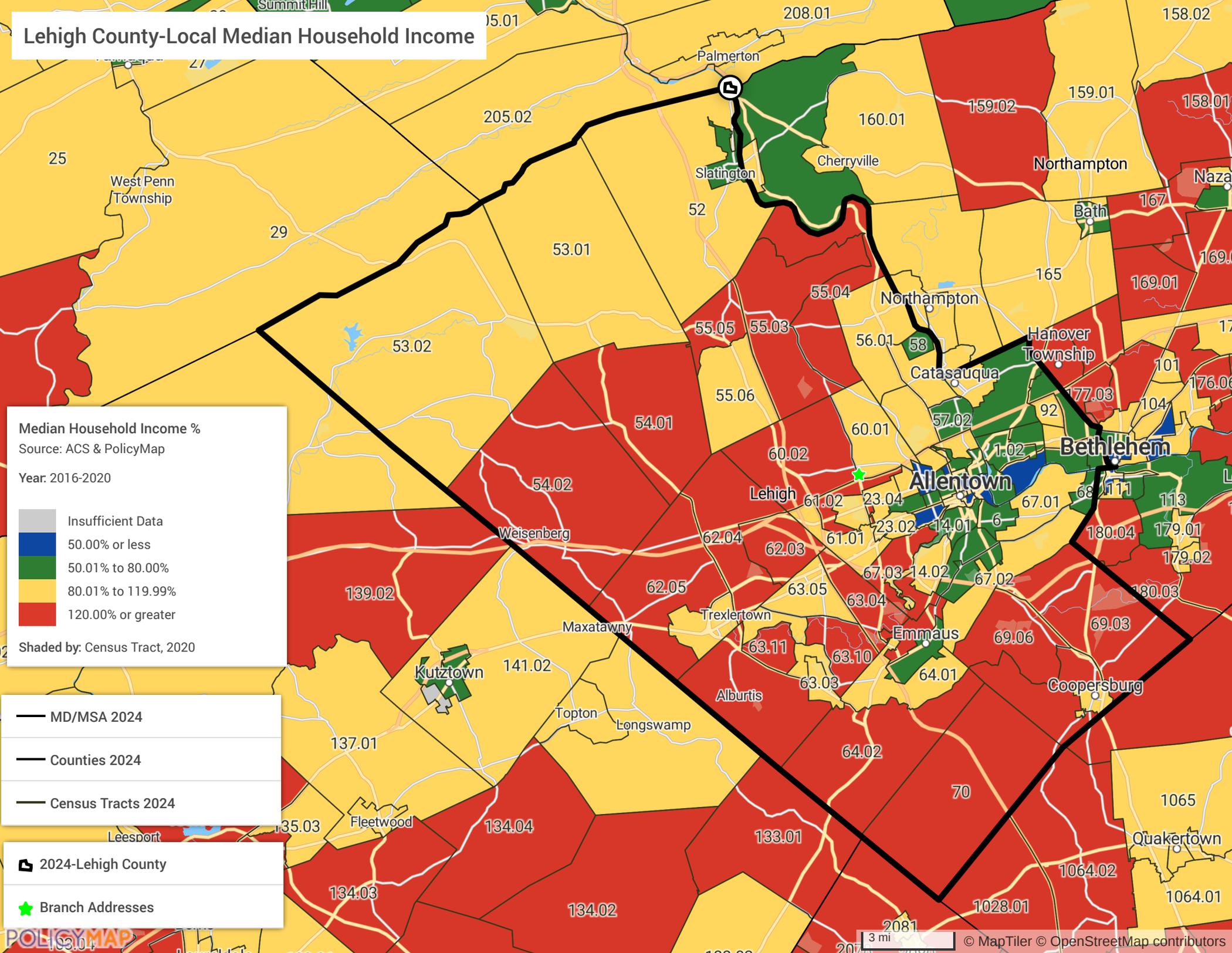
MD/MSA 2024

Counties 2024

Census Tracts 2024

2024-Lehigh County

Branch Addresses



Five County Philadelphia REMA-Local Median Household Income

Median Household Income %

Source: ACS & PolicyMap

Year: 2016-2020

- Insufficient Data
- 50.00% or less
- 50.01% to 80.00%
- 80.01% to 119.99%
- 120.00% or greater

Shaded by: Census Tract, 2020

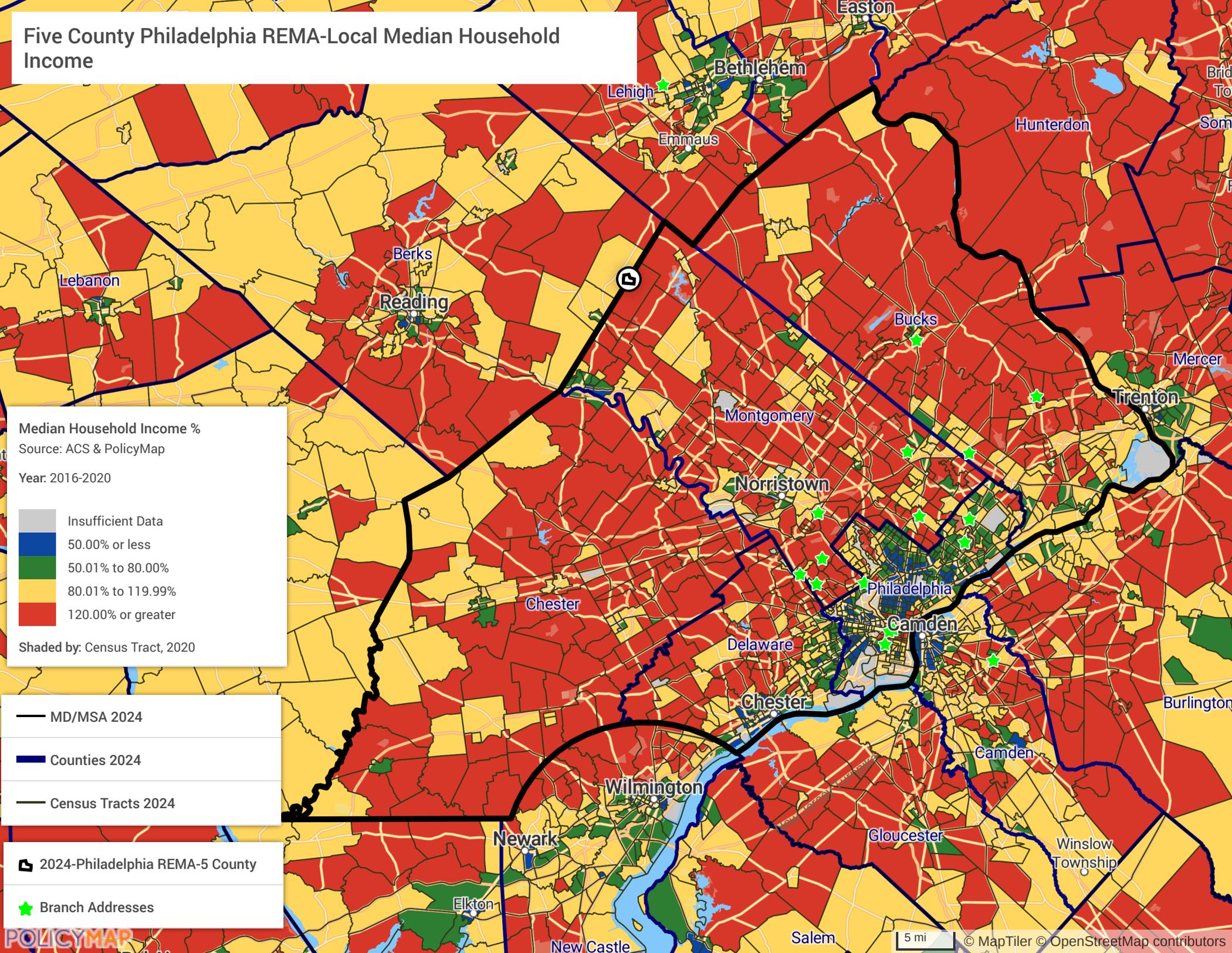
MD/MSA 2024

Counties 2024

Census Tracts 2024

2024-Philadelphia REMA-5 County

Branch Addresses





COMMUNITY REINVESTMENT ACT NOTICE

Under the federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC, and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the FDIC Regional Director, 350 Fifth Avenue, New York, New York 10118. You may send written comments about our performance in helping to meet community credit needs to Maureen P. Sparks, Esquire, Senior Vice President and CRA Officer, Firsttrust Bank, 15 E. Ridge Pike, Suite 400, Conshohocken, PA 19428 and to the FDIC Regional Director, 350 Fifth Avenue, New York, New York 10118. You may also submit comments electronically through FDIC's Web site at www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are a subsidiary of Semperverde Holding Company, a holding company. You may request from the FDIC Regional Manager, Division of Supervision and Consumer Protection, FDIC, 350 Fifth Avenue, New York, NY 10118, an announcement of applications covered by CRA filed by our holding company.



COMMUNITY REINVESTMENT ACT NOTICE

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Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the FDIC, 350 Fifth Avenue, New York, New York 10118, and a list of services provided at this branch. You may also have access to the following information, which we will make available to you at this branch within five calendar days after you make a request to us.

1. A map showing the assessment area containing this branch, which is the area in which the FDIC evaluates our CRA performance in this community.
2. Information about our branches in the assessment area.
3. A list of services we provide at those locations.
4. Data on our lending performance in this assessment area.
5. Copies of all written comments received by us that specifically relate to our CRA performance in this assessment area and any responses we have made to those comments.

If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at Firsttrust Bank, 15 E. Ridge Pike, Suite 400, Conshohocken, PA 19428.

At least 30 days before the beginning of each quarter, the FDIC publishes a list of banks scheduled for CRA examination by the FDIC in that quarter. This list is available from the FDIC Regional Director, FDIC 350 Fifth Avenue, New York, New York 10118. You may send written comments about our performance in helping to meet the community's credit needs to Maureen P. Sparks, Esquire, Senior Vice President and CRA Officer, Firsttrust Bank, 15 E. Ridge Pike, Suite 400, Conshohocken, PA 19428 and to the FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered in evaluating our CRA performance and may be made public.

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Year: 2023 ▼

*Institution Name:

*Respondent ID:

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HOME MORTGAGE DISCLOSURE ACT NOTICE

**Our annual
Home Mortgage Disclosure Act
Statement is available online for review.**

**The data show the geographic distribution of loans
and applications; ethnicity, race, sex, age, and income
of applicants and borrowers; and information about
loan approvals and denials.**

**This data is available online at the Consumer
Financial Protection Bureau's Web site
(www.consumerfinance.gov/hmda)**

**To receive a copy of this data send a written request to
Compliance Officer, Firsttrust Bank, 15 E. Ridge Pike,
Suite 400, Conshohocken, PA 19428**



HOME MORTGAGE DISCLOSURE ACT NOTICE

The Home Mortgage Disclosure Act data about our residential mortgage lending is available online for review. The data show geographic distribution of loans and applications, ethnicity, race, sex, and income of applicants and borrowers; and information about loan approvals and denials. This data is available online at the Consumer Finance Protection Bureau's Web site (www.consumerfinance.gov/hmda)

To receive a copy of this data, send a written request to Compliance Officer, Firsttrust Bank, 15 E. Ridge Pike, Suite 400, Conshohocken, PA 19428.

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Typically, some data resubmissions to correct errors occur during the weeks following the annual submission deadline. For this reason, data users may want to wait for the release of the Snapshot National Loan-Level Dataset to analyze the nationwide data.

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2023 **2022** **2021** **2020** **2019** **2018** **2017**

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