



PUBLIC DISCLOSURE

March 13, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First United National Bank
Charter Number 9480

19535 Route 208
Fryburg, PA 16326

Office of the Comptroller of the Currency

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Monroeville, PA 15146-2529

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not 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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Overall CRA Rating: Satisfactory

The Lending Test is rated: Satisfactory.

The major factors supporting the institution's overall CRA Lending Test ratings are:

- First United National Bank's (FUNB) record of originating loans, as indicated by the loan-to-deposit ratio (LTD), is reasonable.
- FUNB originated a substantial majority of its residential real estate loans inside its assessment area (AA).
- FUNB's record of originating residential real estate loans to borrowers of different income levels reflects excellent penetration among AA geographies.
- FUNB's record of originating residential real estate loans to borrowers of different geographic distribution levels reflects reasonable dispersion among AA geographies.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

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

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

FUNB is a \$260 million, intrastate community bank, chartered in 1909 and is headquartered in Fryburg, Pennsylvania. FUNB is a wholly owned subsidiary of Fryburg Banking Company, a one-bank holding company located in Fryburg, Pennsylvania. The town of Fryburg is located in Clarion County, Pennsylvania. Clarion County is situated in Northwestern Pennsylvania, located north of Interstate 80, approximately eighty (80) miles south of Erie, Pennsylvania. FUNB operates six full-service branch offices. One of the branch offices is located at FUNB's main office in Fryburg, Pennsylvania. The other five branch offices are located in Oil City, New Bethlehem, Franklin, Clarion, and Cranberry, Pennsylvania.

FUNB operates seven automated teller machines (ATMs). Six of the ATMs are located in conjunction with branch office sites. The remaining ATM is situated at an off-site location. FUNB operates its branches with regular business hours of 9:00 a.m. to 4:00 p.m., Monday through Thursday. On Fridays, the bank offers extended lobby hours, which are offered at all six branches, each remaining open until 6:00 p.m. or 7:00 p.m. On Saturday mornings, full-service banking and drive-up services are offered at two branches and drive-up services only are offered at an additional separate branch. FUNB did not open any new branch offices, or close any existing branch offices, during the evaluation period.

FUNB is a full service community bank offering a range of traditional deposit and loan products and services. FUNB primarily focuses on local residential and commercial real estate lending. FUNB's retail products include checking accounts, savings programs, and individual retirement accounts. FUNB's commercial products include commercial, agricultural, and small business loans. FUNB also offers services including mail, telephone, and internet banking. Additional information regarding the bank's products and services is offered on its website: www.fun-bank.com.

As of December 31, 2016, FUNB reported net loans of \$166 million, total deposits of \$231 million, and tier one capital of \$23 million. Net loans represented 64 percent of total assets. FUNB's loan portfolio consists of: residential real-estate loans (69 percent), commercial loans (17 percent), consumer loans (12 percent), construction and development loans (1 percent), and municipal loans (1 percent). There are no financial or legal circumstances impeding the bank's ability to help meet the credit needs in its assessment area (AA). FUNB's previous CRA performance evaluation dated April 14, 2014 was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

FUNB was reviewed under the Small Bank CRA evaluation procedures. Our review encompassed the bank's performance from January 1, 2014 to December 31, 2015. Residential mortgages are the bank's primary loan product and were reviewed as part of this evaluation. Specifically, residential mortgages are broken out into home purchase loans, home improvement loans, and home refinance loans. In order to assess the bank's record of lending, we analyzed a random sample of sixty (60) residential mortgage loans originated in 2014 and 2015.

Data Integrity

Sampling was done in accordance with the OCC's Sampling Methodology Handbook.

Selection of Areas for Full-Scope Review

FUNB has one AA and a full-scope review was performed.

Ratings

The bank's overall rating is based solely on the full-scope review of its one AA.

Other

A community contact identified needs for affordable housing as evidenced with a lengthy waitlist as low-income properties are currently full. The contact noted recent demographic changes with younger families moving into the area seeking affordable housing, while the elderly are remaining in their homes for as long as possible. However, the contact noted local financial institutions are involved and have donated properties that they can no longer maintain.

FUNB continues its commitment to help the credit needs within its AA with the Community Mortgage Program. This program is designed for first time home buyers, and/or lower income households. There is a lower down payment requirement, and private mortgage insurance (PMI) is not required. Additionally, there is a maximum purchase housing price and a maximum annual household income.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c) and 195.28(c), in determining a national bank's (bank) or federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and the Consumer Financial Protection Bureau (CFPB).

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Description of Assessment Area

FUNB includes within its AA, in their entirety, the Pennsylvania counties of Clarion, Venango, and Forest. FUNB's AA also includes contiguous whole census tracts (CTs) or geographies within the Pennsylvania counties of Crawford and Jefferson. FUNB's AA contains forty-one geographies. According to updated 2010 U.S. Census data, of the forty-one AA geographies, thirty-four are designated as middle-income, five are designated as moderate-income, and two are designated as upper-income. There are two CTs within Forest County that are designated as distressed and underserved middle-income CTs. FUNB's AA does not contain any geographies designated as low-income. FUNB's AA meets regulatory requirements and does not arbitrarily exclude low and moderate-income geographies. The geographies comprising FUNB's AA are not located within a Metropolitan Statistical Area (MSA).

The following table details AA demographic data:

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	41	0.00	12.20	82.93	4.88	0.00
Population by Geography	144,117	0.00	8.04	88.16	3.80	0.00
Owner-Occupied Housing by Geography	42,669	0.00	6.66	89.65	3.69	0.00
Business by Geography	8,530	0.00	9.61	86.76	3.62	0.00
Farms by Geography	503	0.00	1.99	96.42	1.59	0.00
Family Distribution by Income Level	38,240	19.32	19.87	23.05	37.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,986	0.00	11.62	85.40	2.98	0.00
Median Family Income		\$49,061	Median Housing Value		\$85,374	
FFIEC Adjusted Median Family Income for 2015		\$55,900	Unemployment Rate (National)		4.7%	
Households Below Poverty Level		13.82%	PA Unemployment		5.4%	
			Clarion County		5.9%	
			Venango County		7.0%	
			Jefferson County		6.6%	
			Crawford County		5.5%	
			Forest County		8.0%	
			(Dec. 2016 BLS Statistics)			

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

FUNB's AA is primarily rural in nature. The 2010 U.S. Census reports a total population of 144,117, total families of 38,240 and total households of 56,900. Of total AA households, 13.82 percent are below the poverty level. Of the 38,240 AA families, 7,389 and 7,597 were classified as low- and moderate-income, respectively. The 2010 U.S.

Census reports the AA median income to be \$49,061 while the Federal Financial Institutions Examination Council (FFIEC) data, updated for 2015, reports adjusted AA median family income to be \$55,900. Of AA families, 19.32 percent are low-income, 19.87 percent are moderate-income, 23.05 percent are middle-income, and 37.76 percent are upper-income.

For Clarion County, the Bureau of Labor Statistics, as of December 2016, reported the unemployment rate to be 5.9 percent, which represents a decline from 7.6 percent at the previous CRA performance evaluation. Unemployment in Clarion County is higher than the 5.4 percent rate reported for the State of Pennsylvania during the same period. Clarion University continues to be a major contributor to the local community and provides significant employment in the county. Top employers as of June 30, 2016 include The Pennsylvania State System of Higher Education, Clarion Hospital, Training Toward Self Reliance Inc., Wal-Mart Associates Inc., and the State Government. Major area industries include health care and social assistance, educational services, retail trade, manufacturing, and accommodation and food services.

For Venango County, the Bureau of Labor Statistics, as of December 2016, reported the unemployment rate to be 7.0 percent, down from 7.4 percent at the previous CRA Performance Evaluation. This represents higher unemployment than the 5.4 percent rate reported for the State of Pennsylvania. Top employers as of June 30, 2016 include State Government, UPMC Northwest, Joy Global Underground Mining Inc., Venango County, and Wal-Mart Associates Inc. Major area industries include manufacturing, health care and social assistance, retail trade, accommodations and food services, and educational services.

Forest County has two CTs that are designated as distressed and underserved middle-income CTs. However, it is important to note that the county is primarily a rural retreat with approximately 75 percent of the county's dwellings being second or vacation homes. Forest County has the third lowest population in the state, with only 7,716 residents, as of the 2010 US Census, which represented significant growth (56 percent) from its reported population of 4,946 in 2000. This growth is almost entirely due to the opening of a State Correctional Facility in the county in 2004 which houses approximately 2,200 inmates. The Bureau of Labor Statistics, as of December 2016, reported the unemployment rate in Forest County to be 8.0 percent, slightly down from 9.1 percent at the previous CRA Performance Evaluation. This represents significantly higher unemployment than the 5.4 percent rate reported for the State of Pennsylvania for the same time period. As of December 2016, Forest County has the second highest unemployment rate in the state. Top employers in Forest County as of June 30, 2016 include State Government, Cornell Abraxas Group Os LLC, ITL LLC, Windsor Inc., and Forest Area School District. Major area industries include public administration, accommodations and food services, mining, quarrying, oil and gas, retail trade, and construction.

FUNB includes only a small portion of Crawford and Jefferson County geographies within its AA. These geographies are situated within rural sections of the counties away

from population centers. Unemployment rates are 6.6 percent and 5.5 percent for Jefferson and Crawford County, respectively. Both unemployment rates have improved since the prior CRA Performance Evaluation. Economically, these geographies exhibit similar characteristics to the geographies located within Clarion and Venango Counties.

Banking competition within FUNB's AA is strong. According to the FDIC Deposit Market Share Report, as of June 30, 2016, within the AA, FUNB is ranked sixth in market share, garnering 6.53 percent of market deposits. Many of the primary competitors in the area are larger institutions. Area competitors and their market shares include: Northwest Bank (17.91 percent), S&T Bank (15.66 percent), PNC Bank, N.A. (14.80 percent), First National Bank of Pennsylvania (8.88 percent), and The Farmers National Bank of Emlenton (8.33 percent). Mortgage competition is strong as well. Northwest Bank, The Farmers National Bank of Emlenton, S&T Bank, PNC Bank, N.A., and First National Bank of Pennsylvania have a 15.9 percent, 8.2 percent, 7.5 percent, 6.5 percent and 5.9 percent market share, respectively, in the 1-4 family residential mortgage market. FUNB is not ranked since they are not a reporter under the Home Mortgage Disclosure Act (HMDA).

Conclusions with Respect to Performance Tests

FUNB's performance test conclusion is based on the full-scope review of the bank's AA.

LENDING TEST

FUNB's lending test is rated Satisfactory.

Loan-to-Deposit Ratio

FUNB's net loan to deposit ratio is reasonable given the bank's size, financial condition, AA credit needs, and both internal and external factors. The bank's quarterly net loan-to-deposit ratio averaged 69.38 percent over 11 quarters from April 1, 2014 to December 31, 2016, with a quarterly low of 66.2 percent and a quarterly high of 73.1 percent. The loan-to-deposit ratio is calculated on a bank-wide basis.

The bank's net loan-to-deposit ratio is consistent with other community banks of similar size (asset size between \$120 million and \$360 million), location, and product offerings. Given the limited number of banks in FUNB's AA, the peer group consists of seven other banks considered to be similarly situated to FUNB located within a ten county area that includes FUNB's AA. FUNB ranks fifth among the eight banks in the peer group. The aggregate average net loan-to-deposit ratio of the other institutions was 81.6 percent, ranging from a low of 49.3 percent to a high of 108.2 percent over the same 11 quarter period.

Lending in Assessment Area

A substantial majority of the originated loans reported by FUNB during the evaluation period were inside of the bank's AAs. Overall, 80.0 percent of the number of loans and 80.7 percent of loan dollars are inside of the bank's AAs. These calculations are done on a bank-wide basis. This record of AA lending was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Lending to Borrowers of Different Incomes

FUNB's record of originating residential mortgages among AA borrowers of different income levels reflects excellent penetration, considering the context in which FUNB operates.

The following table details the distribution of home purchase loans, home improvement loans, and home refinancing loans originated by FUNB during the evaluation period among AA borrowers.

Borrower Income Level	Low		Moderate		Middle		Upper	
	% AA Families	% Bank Loans	% AA Families	% Bank Loans	% AA Families	% Bank Loans	% AA Families	% Bank Loans
Home Purchase	19.32%	9.67%	19.87%	32.25%	23.05%	25.80%	37.76%	32.25%
Home Improvement	19.32%	22.22%	19.87%	22.22%	23.05%	33.33%	37.76%	22.22%
Home Refinance	19.32%	0.00%	19.87%	37.50%	23.05%	12.50%	37.76%	50.00%

Source: Loan sample and 2010 U.S. Census data

FUNB's record of originating home purchase loans to low-income AA borrowers is near the ratio of AA-families classified as low-income. FUNB's record of originating home improvement loans to low-income AA borrowers exceeds the ratio of AA-families classified as low-income. FUNB did not originate any home refinance loans to low-income AA borrowers.

Compared to the percentage of moderate-income families in the AA, FUNB's exceeds the ratio for originating home purchase loans, home improvement loans, and home refinance loans.

Opportunities to originate residential mortgages within the AA may be impacted by housing affordability and banking competition. US Census data for 2010 reports the median housing value within FUNB's AA to be \$85,374. The latest FFIEC median family income is \$55,900, which means that a low-income person earns less than \$27,950. Opportunities to originate residential mortgages within FUNB's AA may also

be impacted by demographic factors including the extent to which the bank’s AA population is age 65 or older (17.30 percent), retired (22.69 percent), eligible for social security (36.94 percent), and/or the population that is below poverty level (13.82 percent).

Geographic Distribution of Loans

The distribution of FUNB’s residential mortgage originations reflects a reasonable dispersion among the AA geographies considering the context in which FUNB operates. Consideration was given to four loans that FUNB originated in distressed and underserved middle-income CTs within the AA.

The following table details the distribution of home purchase loans, home improvement loans, and home refinancing loans originated by FUNB during the evaluation period among AA geographies.

Census Tract Income Level	Low		Moderate		Middle		Upper	
	% AA Families	% Bank Loans	% AA Families	% Bank Loans	% AA Families	% Bank Loans	% AA Families	% Bank Loans
Home Purchase	0.00%	0.00%	6.66%	0.00%	89.65%	93.55%	3.69%	6.45%
Home Improvement	0.00%	0.00%	6.66%	22.22%	89.65%	66.67%	3.69%	11.11%
Home Refinance	0.00%	0.00%	6.66%	0.00%	89.65%	100.00%	3.69%	0.00%

Source: Loan sample and 2010 U.S. Census data

FUNB did not originate any home purchase loans or home refinance loans within moderate-income AA geographies. The bank’s record of originating home improvement loans within moderate-income AA geographies exceeds the ratio of owner-occupied housing available within moderate-income AA geographies.

FUNB’s AA contains five moderate-income geographies, compared to eight moderate-income geographies during the prior evaluation period. Of all owner-occupied housing available within FUNB’s AA, the 2010 U.S. census data reports that 6.66 percent (2,842 of 42,669 units) are located within the AA’s moderate-income geographies. The vast majority, 93.34 percent of all AA owner-occupied housing, is located within the AA’s middle- and upper-income geographies. The decrease in number of moderate-income CTs, combined with no low-income CTs in the AA, reduced the bank’s opportunities to originate residential mortgage loans within those moderate-income geographies. Consideration was given to the bank for originating one home purchase loan, two home improvement loans, and one refinance loan in the distressed/underserved middle-income CTs located in Forest County.

FUNB's AA contains no low-income geographies, so an analysis would not be meaningful.

Responses to Complaints

There were no CRA complaints received by the Bank or the agency during the evaluation period.