



PUBLIC DISCLOSURE

January 7, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Carthage Federal Savings & Loan Association
Charter Number 702657

313 State Street
Carthage, NY 13619

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, NY 13057

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

The Lending Test is rated: Satisfactory.

The primary factors supporting the CRA rating are as follows:

- Carthage Federal Savings and Loan Association (FS & LA) had a reasonable loan-to-deposit ratio during the evaluation period.
- A majority of home mortgage loans originated during the evaluation period were originated inside the bank's assessment area (AA).
- The bank had a reasonable distribution of home mortgage loans to borrowers of different income levels within the AA.
- The bank had a poor distribution of home mortgage loans among census tracts of different income designations within the AA.

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 generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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 Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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.

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) 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

Carthage FS & LA is a \$233 million, single state, federally chartered thrift headquartered in Carthage, New York (NY). The bank is wholly owned by the Riverbank Financial Holdings Company. The bank operates three full service branches located in Carthage, Watertown, and Clayton, NY, all within Jefferson County. The bank's AA is all of Jefferson County, which is the sole county in the Watertown-Fort Drum, NY Metropolitan Statistical Area (MSA). The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts or reflect illegal discrimination.

The bank has one automated teller machine (ATM) at each branch location. There are no offsite ATMs. Banking hours are 9:00 a.m. to 5:00 p.m. Monday through Friday at the Carthage and Watertown branches; the Clayton branch has hours from 9:00 a.m. to 4:00 p.m. The Watertown branch is open Saturdays 9:00 a.m. to 12:00 p.m. The Carthage and Watertown branches also have drive-thru hours Monday through Wednesday 8:30 a.m. to 5:00 p.m.; Thursday and Friday 6:30 a.m. to 5:00 p.m. at Carthage and 8:30 a.m. to 5:00 p.m. at Watertown; and 9:00 a.m. to 12:00 p.m. on Saturday. Since the prior CRA evaluation, there were no branch openings or closings, and the bank was not part of a merger or acquisition.

Carthage FS & LA offers a variety of traditional and non-complex products and services, with a primary focus on retail lending products. Retail lending is heavily concentrated in residential mortgage loan products, including fixed and adjustable rate residential mortgages, construction loans, and home equity lines of credit and loans. In addition to conventional mortgages, the bank also offers mortgages through the Department of Veterans Affairs (VA), Federal Housing Administration (FHA), and the U.S. Department of Agriculture (USDA) Rural Development programs. Consumer loan products include personal secured and unsecured loans, automobile loans, recreational vehicle and boat loans, and deposit secured loans. Commercial lending is minimal and is not a primary lending focus. The bank offers online and mobile banking services and features include account view, deposit transfer (internal and external), remote deposit capture, and bill pay. The online banking service also allows customer to submit applications for both loan and deposit products.

As of June 30, 2018, Carthage FS & LA had \$186 million in deposits. The Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of the same date indicates Carthage FS & LA has the fourth largest deposit share, with 11.4 percent of the market, in the Watertown-Fort Drum MSA. Major competitors include Watertown Savings Bank, Community Bank, N.A., and KeyBank.

As of December 31, 2017, Carthage FS & LA's balance sheet included \$170 million or 82 percent of total assets in gross loans. Residential one-to-four family mortgage loans are the bank's primary loan product, representing \$163 million (95 percent) of total loans. The bank's other loan products consist of \$2 million (1 percent) in commercial real estate, and \$5 million (4 percent) in loans to individuals.

Carthage FS & LA has no legal, financial, or other impediments hindering its ability to help meet the credit needs in its assessment area. Carthage FS & LA's last CRA evaluation was dated October 21, 2013, at which time the bank's performance was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covered the time period from October 21, 2013, through December 31, 2018. Our review of the bank's performance under the lending test was based on loan originations and purchases in the bank's primary loan product, home mortgage loans, between January 1, 2015, and December 31, 2017.

Data Integrity

A data integrity exam, completed in advance of this evaluation, found the aggregate HMDA data to not be reliable. To determine the bank's performance under the lending test, a sample of home mortgage loans originated and purchased from 2015-2017 was used.

Selection of Areas for Full-Scope Review

We conducted a full-scope review of the bank's only AA. Refer to Appendix A for more information regarding evaluation scope.

Ratings

The overall rating is based on a full-scope review of the bank's single AA. The assessment for borrower and geographic distribution measures the bank's performance against the performance by other lenders in the AA and performance against AA demographics.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank'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, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

We based our evaluation of Carthage FS & LA's performance under the lending test, considering the bank's sole AA.

LENDING TEST

The bank's performance under the lending test is satisfactory. The loan-to-deposit ratio is reasonable. Carthage FS & LA originated a majority of the bank's loans inside its AA. The bank's record of lending to borrowers of different incomes reflects a reasonable distribution of home mortgage loans to borrowers of different incomes within the AA. The geographic distribution of loans among the census tracts of different income levels in the AA was poor.

Loan-to-Deposit Ratio

Carthage FS & LA's average loan-to-deposit ratio during the evaluation period was reasonable. The bank's average quarterly loan-to-deposit ratio since the prior CRA evaluation through December 31, 2017, was 98.41 percent. In comparison, five similarly situated banks had average quarterly loan-to-deposit ratios ranging from 56.42 percent to 115.64 percent during the same period.

Lending in Assessment Area

A majority of the bank's home mortgages originated during the evaluation period were inside the bank's AA. Based on our sample of 166 home mortgages, Carthage FS & LA originated 62.0 percent and 66.8 percent of its loans in its AA, by number and dollar amount, respectively. Refer to the table below for further detail.

Lending Inside and Outside of the Watertown-Fort Drum, NY MSA AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%	\$	%	\$	%		
Home Mortgage										
2015	40	66.7	20	33.3	60	4,663	75.0	1,554	25.0	6,217
2016	28	54.9	23	45.1	51	3,210	60.7	2,079	39.3	5,289
2017	35	63.6	20	36.4	55	3,442	63.3	1,996	36.7	5,438
Subtotal	103	62.0	63	38.0	166	11,315	66.8	5,629	33.2	16,944
Total	103	62.0	63	38.0	166	11,315	66.8	5,629	33.2	16,944
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>										

Lending to Borrowers of Different Incomes

Carthage FS & LA had a reasonable distribution of home mortgages to borrowers of different incomes during the evaluation period. The bank's percentage of home mortgage loans made to low-income borrowers well exceeded the average for all lenders (aggregate) in both the 2015-2016 and 2017 time periods. The percentage of home mortgages loans made to moderate-income borrowers was below in 2015-2016, and essentially equal in 2017, the average for all lenders in the AA. The portion of home mortgages made to low-income borrowers was significantly below in 2015-2016, and below in 2017, the portion of low-income families in the AA. These levels are considered reasonable given the high poverty level in the AA during both time periods. The portion of home mortgages made to moderate-income borrowers was below in 2015-2016, and near to in 2017, the portion of moderate-income families in the AA.

Please refer to Appendix C for further detail.

Geographic Distribution of Loans

The geographic distribution of loans reflects poor distribution among census tracts of different income levels. In 2015 and 2016, the bank's AA included six moderate-income census tracts and no low-income census tracts. Following the 2015 American Community Survey (ACS) (effective in 2017), the moderate-income census tracts decreased to five. The percentage of home mortgages made in moderate-income census tracts in both the 2015-2016 and 2017 time periods was significantly below the average for all lenders in the AA. The percentage of home mortgages made in moderate income census tracts in the AA was below the percentage of owner-occupied housing units in those census tracts in both the 2015-2016 and 2017 time periods.

Please refer to Appendix D for further detail.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (1/1/2014 to 12/31/2017) Investment and Service Tests and CD Loans: Not Applicable	
Financial Institution		Products Reviewed
Carthage Federal Savings & Loan Association (Carthage FS & LA) Carthage, NY		Home mortgage loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Watertown-Fort Drum, NY MSA	Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

Watertown-Fort Drum, NY MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Watertown-Fort Drum, NY MSA 2015 and 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	23.1	53.8	15.4	7.7
Population by Geography	116,229	0.0	24.2	58.7	17.1	0.0
Housing Units by Geography	57,168	0.0	19.0	67.5	13.4	0.0
Owner-Occupied Units by Geography	25,234	0.0	9.2	69.6	21.2	0.0
Occupied Rental Units by Geography	18,875	0.0	42.2	49.0	8.8	0.0
Vacant Units by Geography	13,059	0.0	4.6	90.4	5.0	0.0
Businesses by Geography	4,888	0.0	18.7	59.3	21.8	0.2
Farms by Geography	370	0.0	3.2	75.9	20.8	0.0
Family Distribution by Income Level	30,650	20.8	18.0	22.0	39.2	0.0
Household Distribution by Income Level	44,109	22.5	16.4	19.8	41.3	0.0
Median Family Income MSA - 48060 Watertown-Fort Drum, NY MSA		\$51,834	Median Housing Value			\$119,601
			Median Gross Rent			\$842
			Families Below Poverty Level			12.1%
<p>Source: 2010 U.S. Census and 2016 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.</p>						

Demographic Information of the Assessment Area						
Assessment Area: Watertown-Fort Drum, NY MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	19.2	65.4	7.7	7.7
Population by Geography	118,947	0.0	18.3	74.5	7.1	0.1
Housing Units by Geography	58,536	0.0	15.8	78.5	5.7	0.0
Owner-Occupied Units by Geography	24,610	0.0	7.9	83.2	8.9	0.0
Occupied Rental Units by Geography	19,696	0.0	32.1	63.5	4.4	0.0
Vacant Units by Geography	14,230	0.0	6.8	91.2	2.1	0.0
Businesses by Geography	4,875	0.0	18.2	75.9	5.9	0.0
Farms by Geography	354	0.0	3.7	83.6	12.7	0.0
Family Distribution by Income Level	30,116	19.8	18.3	22.4	39.5	0.0
Household Distribution by Income Level	44,306	22.6	16.2	20.8	40.5	0.0
Median Family Income Non-MSAs - NY		\$57,300	Median Housing Value			\$139,278
			Median Gross Rent			\$979
			Families Below Poverty Level			10.9%
<p>Source: 2015 ACS Census and 2017 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.</p>						

The Watertown-Fort Drum, NY MSA is a single county MSA, exclusively made up of Jefferson County. Carthage FS & LA's AA consists of the Watertown-Fort Drum, NY MSA. The area, which is located in the northern central portion of NY State, is primarily rural in nature. In 2015 and 2016, the AA had 26 census tracts and included no low-income tracts, 6 moderate-income tracts (23.1 percent), 14 middle-income tracts (53.8 percent), 4 upper-income tracts (15.4 percent), and 2 not classified for income tracts (7.7 percent). The unclassified income census tracts are associated with the Fort Drum military base. Following the 2015 ACS, as of 2017, the AA had no low-income tracts, 5 moderate-income tracts (19.2 percent), 17 middle-income tracts (65.4 percent), 2 upper-income tracts (7.7 percent), and 2 unknown-income tracts (7.7 percent).

As of 2010, the overall population of the AA was 116,229, comprised of 44,109 households and 30,650 families. There were 57,168 housing units, with 44.1 percent owner-occupied, 33.0 percent renter-occupied, and 22.8 percent vacant. The weighted average median housing value was \$119,601. Approximately 12.1 percent of families in the AA were below the poverty line. As of 2017, following the ACS, the population increased to 118,947 and households increased to 44,306; however, the number of families declined to 30,116. The weighted average median housing value increased to \$139,278. The number of households with income below the poverty line decreased to 10.9 percent.

Lending opportunities in the area are prevalent across several product types. Based on peer data from institutions who submit CRA and HMDA registers, there is demand for both commercial and mortgage lending within the Watertown-Fort Drum, NY MSA. Mortgage lending is less prevalent than small business lending in the area, but is still in demand. In 2017, there were 389 mortgages totaling \$40.7 million, originated by 60 different lenders within the MSA. The average loan size originated throughout the year across all lenders was \$134,000. Carthage FS & LA is among the top mortgage lenders within the AA.

The unemployment rate in Jefferson County was 7.3 percent as of December 31, 2017, substantially higher than the New York State unemployment rate of 4.7 percent at the same date. However, unemployment in Jefferson County is seasonal. In February 2017, unemployment in the county was at a high point of 8.4 percent. Following the peak in February, the unemployment rate began to trend downward, reaching its low point in June 2017 at 5.5 percent. Unemployment remained stable between 5.5 and 5.6 percent through October 2017 before trending back upwards for the remainder of the year. This pattern is consistent with historic trends. Overall, the unemployment rate has trended downward over the past decade, since its peak of 12.1 percent in February 2012. The July 2018 unemployment rate was 4.8 percent, its lowest point since October 2007. Major employers in Jefferson County are predominately concentrated in the government and healthcare industries and include Fort Drum, Samaritan Medical Center, New York State, Jefferson County, Convergys, and Jefferson Rehabilitation Center, according to the Jefferson County Economic Development Agency.

We contacted a local community organization servicing Jefferson County, including the city of Watertown. The organization is concerned with affordable housing for people of low- and moderate-income (LMI); LMI neighborhood revitalization and stabilization; community services for LMI people; and economic development through small business lending. The contact indicated there is a significant need for affordable mortgage, and small size businesses loans

in the AA. There also a significant need for community development loans, investments and services in the AA, with many opportunities for banks.

Appendix C: Lending to Borrowers of Different Incomes in the Watertown-Fort Drum, NY MSA AA

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Watertown-Fort Drum, NY MSA 2015-2016	68	7,873	100.0	2,537	20.8	7.4	4.3	18.0	11.8	13.8	22.0	29.4	21.6	39.2	51.5	44.4	0.0	0.0	15.9	
Total	68	7,873	100.0	2,537	20.8	7.4	4.3	18.0	11.8	13.8	22.0	29.4	21.6	39.2	51.5	44.4	0.0	0.0	15.9	

Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Watertown-Fort Drum, NY MSA 2017	35	3,442	100.0	2,585	19.8	11.4	4.6	18.3	17.1	17.4	22.4	28.6	25.0	39.5	42.9	38.4	0.0	0.0	14.6
Total	35	3,442	100.0	2,585	19.8	11.4	4.6	18.3	17.1	17.4	22.4	28.6	25.0	39.5	42.9	38.4	0.0	0.0	14.6

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Appendix D: Geographic Distribution of Loans in the Watertown-Fort Drum, NY MSA AA

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Watertown-Fort Drum, NY MSA 2015-2016	68	7,873	100.0	2,537	0.0	0.0	0.0	9.2	5.9	8.6	69.6	69.1	70.8	21.2	25.0	20.5	0.0	0.0	0.1
Total	68	7,873	100.0	2,537	0.0	0.0	0.0	9.2	5.9	8.6	69.6	69.1	70.8	21.2	25.0	20.5	0.0	0.0	0.1

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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

2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Watertown-Fort Drum, NY MSA 2017	35	3,442	100.0	2,585	0.0	0.0	0.0	7.9	5.7	8.2	83.2	88.6	84.2	8.9	5.7	7.6	0.0	0.0	0.0
Total	35	3,442	100.0	2,585	0.0	0.0	0.0	7.9	5.7	8.2	83.2	88.6	84.2	8.9	5.7	7.6	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

