



**PUBLIC DISCLOSURE**

August 19, 2019

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

The Bank of Greene County  
Charter Number 718028

302 Main Street  
Catskills, NY 12414

Office of the Comptroller of the Currency

340 Madison Avenue,  
4th Floor  
New York, NY 10173

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**

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

The Lending Test rating is based on:

- The Bank of Greene County's (TBOG or the bank) quarterly average loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's lending is inside its AA by number of loans originated and purchased.
- The bank's distribution of loans represents excellent dispersion to low- and moderate-income (LMI) census tracts.
- The bank's distribution of loans among individuals of different income levels in the AA reflects a reasonable dispersion.

The Community Development (CD) Test rating is based on:

- The bank's community development activities adequate responsiveness to the Community Development needs of its AAs.

### **Loan-to-Deposit Ratio**

The bank's average loan-to-deposit (LTD) is reasonable. The bank's quarterly average LTD ratio during the evaluation period was 70.67 percent and ranged from a quarterly low of 64.43 percent on March 31, 2018 to a quarterly high of 76.10 percent on December 31, 2016. We compared the bank's LTD ratio to six similarly situated banks in Greene, Ulster, and Albany Counties, with total asset sizes ranging from \$248 million to \$1.48 billion. The quarterly average LTD of these banks over the same period was 83.05 percent. The ratios ranged from a quarterly low of 81.32 percent to a quarterly high of 87.11 percent. Although the bank's quarterly average loan-to-deposit ratio is lower than the peer group, it is reasonable when taking into consideration the bank's performance context.

### **Lending in Assessment Area**

A majority of the bank's home mortgage loans was made within the bank's assessment area. This meets the standard for satisfactory performance. During this evaluation period, 74.7 percent of the number and 68.8 percent of the dollar amount of home mortgage loans were made within the bank's AA. This includes HMDA reported loans from January 1, 2016 to December 31, 2018. Refer to Table D, below.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2016	380	76.3	118	23.7	498	63,775	68.8	28,869	31.2	92,644
2017	298	68.0	140	32.0	438	44,541	64.6	24,357	35.4	68,898
2018	323	80.0	81	20.1	404	57,584	72.4	21,932	27.6	79,516
<b>Subtotal</b>	<b>1,001</b>	<b>74.7</b>	<b>339</b>	<b>25.3</b>	<b>1,340</b>	<b>165,900</b>	<b>68.8</b>	<b>75,158</b>	<b>31.2</b>	<b>241,058</b>
<b>Total</b>	<b>1,001</b>	<b>74.7</b>	<b>339</b>	<b>25.3</b>	<b>1,340</b>	<b>165,900</b>	<b>68.8</b>	<b>75,158</b>	<b>31.2</b>	<b>241,058</b>

*Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data  
Due to rounding, totals may not equal 100.0*

## Description of Institution

The Bank of Greene County (TBOG) is a \$1.2 billion intrastate thrift chartered in 1889 in Catskill, New York. The bank is a subsidiary of Greene County Bancorp, Inc. TBOG has two limited-purpose subsidiaries: Greene County Commercial Bank, which is chartered under New York State serves the banking needs of local municipalities, and Greene Property Holdings, a real estate investment trust.

TBOG offers an array of products and services including personal and commercial checking and savings accounts, consumer and commercial loans, certificates of deposits, and merchant services. The bank offers online and mobile banking for additional convenience to its customers. Branch lobby hours are set to meet customer needs with all branches open Monday through Friday and most locations open Saturday.

The bank operates 15 branches in the Hudson Valley counties of Greene, Columbia, Albany, and Ulster. TBOG opened two new branches during the evaluation period, including the Copake Branch opened in October 2017 and the Woodstock Branch opened in September 2018. The majority of the bank's 15 branches are located throughout Greene County (six) and Columbia County (five). Two branches are located in Albany County, and two branches are located in Ulster County. TBOG has not closed any branches during the evaluation period.

TBOG has three AAs located in south eastern New York state. TBOG has defined the whole Greene County and Columbia County, as well as part of Albany County and Ulster County as its AAs. Albany County is part of the Albany Schenectady- Troy MSA (10580). Greene County and Columbia County are adjacent non-MSA counties south of Albany County. Ulster County comprises the Kingston, NY MSA (28740), south of Greene and Columbia County. Overall the three AAs are comprised of 64 census tracts.

As of December 31, 2018, TBOG had \$1.2 billion in total assets. Net loans and leases totaled \$763 million or 64 percent of average assets, and total deposits were \$1.0 billion. Tier one capital was \$103 million.

The bank is not subject to any legal or financial restrictions that could impair its ability to help meet the credit needs of its AAs. TBOG was rated “Satisfactory” on its last CRA Performance Evaluation dated August 15, 2016.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated TBOG using Intermediate Small Bank (ISB) performance criteria, which includes a lending test and CD test. The lending test evaluates the bank’s record of meeting the credit needs of its AAs through its lending activities. The CD test evaluates the bank’s responsiveness to CD needs of its AAs through qualified lending, investments and donations, and services.

The evaluation period under the Lending Test is representative of the bank’s lending strategy since the last CRA examination. The Lending Test covers two evaluation periods. For the period from January 1, 2016 through December 31, 2016, we used the data from the 2010 U.S. Census in our analysis. For the period from January 1, 2017 through December 31, 2018, the Office of Management and Budget (OMB) updated the 2010 U.S. Census with the 2015 American Community Survey (ACS) Census data. The change resulted in differences to the demographics such as median family income for the assessment areas.

The evaluation period for the Community Development Test covers the period from August 16, 2016 through December 31, 2018. We reviewed documentation supplied by bank management to determine if the bank’s CD loans, investments, and services meet the regulatory definition for community development. Further discussion of the bank’s CD activities is included in the ‘Community Development’ section of this performance evaluation.

### **Selection of Areas for Full-Scope Review**

TBOG has three AAs located in the Hudson Valley region of New York, including Albany county, Greene and Columbia counties, and Ulster county. Albany county AA is located in the Albany-Schenectady-Troy Metropolitan Statistical Area (MSA) and Ulster County AA is located in the Kingston MSA. The Greene/Columbia AA is located in a non-MSA and is comprised of all census tracts located within Greene and Columbia counties. The Albany AA consists of 4 census tracts, which are all middle income. The Ulster County AA consists of 25 census tracts, of which one is low-income, four are moderate-income, 16 are middle-income, and four are upper-income. The Greene and Columbia AA consists of 35 census tracts, which include three moderate-income, 15 middle-income, and 17 upper-income tracts. There are no low-income tracts in the AA. We performed full-scope reviews of all three AAs. Refer to the table in Appendix A for more information.

### **Ratings**

The bank’s overall rating is based on the review of the bank’s full scope AAs. The Albany, and Greene and Columbia County AAs do not contain low-income geographies, with a modest percentage of moderate-income geographies in the Greene, and Columbia AAs. The Ulster AA contains a single low-income geography and a modest percentage of moderate-income geographies. Given the demographic makeup of the AAs, more weight is placed on performance in moderate-income geographies. In addition, the vast majority of the bank’s loans, deposits, and branches are located within the Greene/Columbia

County AA. Hence, we placed more weight on the bank's performance in the Green-Columbia County AA.

## **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 AA 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 Bureau of Consumer Financial Protection, 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.

## State Rating

### State of New York

**CRA rating for the State of New York:** This institution is rated **Satisfactory**

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory**

The major factors supporting this rating include:

- The Bank of Greene County's (TBOG or the bank) quarterly average loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's lending is inside its AA by number of loans originated and purchased.
- The bank's distribution of loans represents excellent dispersion to low- and moderate-income (LMI) census tracts.
- The bank's distribution of loans among individuals of different income levels in the AA reflects a reasonable dispersion.
- The bank's community development activities demonstrate adequate responsiveness to the Community Development needs of its AAs.

Table 1 provides a breakdown of the total loan portfolio.

<b>Loan Portfolio Summary by Loan Product</b>		
<b>31-Dec-18</b>		
<b>Loan Category</b>	<b>\$ Amount (thousands)</b>	<b>Percentage of Outstanding Loans</b>
Residential Real Estate	413,231	54.10%
Non-Farm/Non-Residential	203,432	26.70%
Commercial & Industrial	76,344	10.00%
Multifamily Loans	56,090	7.40%
Consumer Loans	5,404	0.70%
Other Loans	8,042	1.10%
Agriculture & Farmland Loans	0	0.00%
<b>TOTAL LOANS</b>	<b>763,362</b>	<b>100%</b>

*Source: December 31, 2018 Call Report*



The bank is not subject to any legal or financial restrictions that could impair its ability to help meet the credit needs of its AAs. TBOG was rated “Satisfactory” on its last CRA Performance Evaluation dated August 15, 2016.

## Albany County 2016

Table A - Demographic Information of the Assessment Area 2016						
Assessment Area: Albany County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	12,622	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,223	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,959	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,115	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,149	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	551	0.0	0.0	100.0	0.0	0.0
Farms by Geography	42	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,496	16.8	22.0	30.5	30.7	0.0
Household Distribution by Income Level	5,074	19.7	16.6	22.0	41.7	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$74,739	Median Housing Value			\$169,209
			Median Gross Rent			\$733
			Families Below Poverty Level			4.1%

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.

The economy of the Albany County AA is generally stable, though economic expansion has been decelerating along with a tightening labor market. The major employment sectors in Albany County are state and local government, education and health care services, professional and business services, and retail trade. The major employers are New York State Government, St. Peter's Health Partners, Albany Medical Center, Golub Corporation, Hannaford Supermarkets and General Electric.

The December 2016 US Department of Labor and Industry Data indicated the unemployment rate for the Albany County as 4.1 percent. Comparatively, the December 2016 New York state unemployment rate was 4.9 percent, and the U.S. Department of Labor and Industry national unemployment rate was 4.9 percent.

TBOG ranked first in deposit market share in the Albany County AA at 30.04 percent per the December 31, 2016 Deposit Market Share Report. TBOG's main competitors are The National Bank of Coxsackie (28.4 percent market share with one branch), First Niagara Bank, NA (24.53 percent market share with one branch), and KeyBank, NA (17.03 percent market share with one branch).

Peer Mortgage Data for 2016 indicated TBOG had a 7.36 percent loan market share, and ranked 3<sup>rd</sup> among 55 lending institutions in the AA. TBOG's major competitors for mortgage lending in the AA are: Homestead Funding Corporation, ranked 1<sup>st</sup> with a 16.72 percent market share; Wells Fargo Bank, NA, ranked 2<sup>nd</sup> with a 11.37 percent market share; The National Bank of Coxsackie, ranked 4<sup>th</sup> with a 5.69

percent market share.

## Albany County 2017-2018

**Table A - Demographic Information of the Assessment Area 2017-2018**

Assessment Area: Albany County AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	12,644	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,339	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,129	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,080	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,130	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	588	0.0	0.0	100.0	0.0	0.0
Farms by Geography	42	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,474	17.4	22.9	25.7	34.0	0.0
Household Distribution by Income Level	5,209	22.0	18.4	18.5	41.1	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$81,103	Median Housing Value			\$171,979
			Median Gross Rent			\$741
			Families Below Poverty Level			4.5%

Source: 2015 ACS Census and 2018 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 were no major changes in the Albany County AA economy from the 2016 evaluation period. The unemployment rate for the Albany County is 4.2 percent as of December 2017. Comparatively, the New York state unemployment rate is 4.7 percent, and the U.S. Department of Labor and Industry national unemployment rate is 4.9 percent.

TBOG ranks first in deposit market share in the Albany County AA at 33.7 percent according to the 2017 Peer Deposit Data. TBOG's main competitors are KeyBank, NA (36.1 percent market share with one branch), and The National Bank of Coxsackie (30.3 percent market share with one branch).

According to 2017 Peer Mortgage Data, TBOG had a 5.86 percent loan market share, and ranked 4<sup>th</sup> among 64 lending institutions in the AA. TBOG's major competitors for mortgage lending in the AA are: Homestead Funding Corporation, ranked 1<sup>st</sup> with a 13.68 percent market share; Wells Fargo Bank, NA, ranked 2<sup>nd</sup> with a 9.45 percent market share; and SEFCU Services LLC, ranked 3<sup>rd</sup> with a 7.49 percent market share.

## Greene County/Columbia County 2016

Table A - Demographic Information of the Assessment Area 2016

Assessment Area: Greene County/Columbia County AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	5.7	51.4	42.9	0.0
Population by Geography	109,543	0.0	7.5	47.9	44.6	0.0
Housing Units by Geography	61,384	0.0	7.4	51.5	41.1	0.0
Owner-Occupied Units by Geography	32,424	0.0	7.0	44.9	48.1	0.0
Occupied Rental Units by Geography	11,764	0.0	9.6	57.8	32.6	0.0
Vacant Units by Geography	17,196	0.0	6.5	59.9	33.6	0.0
Businesses by Geography	6,692	0.0	6.4	51.2	42.4	0.0
Farms by Geography	443	0.0	3.6	43.3	53.0	0.0
Family Distribution by Income Level	28,356	16.0	16.5	19.4	48.0	0.0
Household Distribution by Income Level	44,188	19.5	14.6	18.2	47.7	0.0
Median Family Income Non-MSAs – NY		\$54,386	Median Housing Value			\$207,005
			Median Gross Rent			\$748
			Families Below Poverty Level			7.2%

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.

The economy of Greene and Columbia Counties is generally stable. Job growth has been positive, though lags the national average. State government and tourism employment help anchor the economy. The counties' populations are aging, and there is a need for higher wage opportunities. The largest employment sectors for the two counties are: healthcare and social assistance, retail trade, educational services, public administration, and construction.

The unemployment rate for the Greene County was 5 percent, and Columbia County's unemployment was 3.7 percent per December 2016 US Department of Labor and Industry data. Comparatively, the New York state unemployment rate was 4.9 percent, and the U.S. unemployment rate was 4.9 percent.

TBOG ranked first in deposit market share in the Greene County/Columbia County AA at 29.85 percent according to Peer Deposit Data as of December 31, 2016. TBOG's main competitors are First Niagara Bank, NA (19.26 percent market share with nine branches), The National Union Bank of Kinderhook (11.14 percent with four branches), KeyBank, NA (7.63 percent market share with three branches), and The National Bank of Coxsackie (7.55 percent market share with five branches)

TBOG had a 13.78 percent loan market share and ranked 2<sup>nd</sup> among 168 lending institutions in the AA per 2016 Mortgage Data. TBOG's major competitors for mortgage lending in the AA are: Homestead Funding Corporation, ranked 1<sup>st</sup> with an 18.33 percent market share; Wells Fargo Bank, NA, ranked 3<sup>rd</sup> with a 10.29 percent market share; and Quicken Loans, ranked 4<sup>th</sup> with a 4.95 percent market share.

## Greene County/Columbia County 2017-2018

Table A - Demographic Information of the Assessment Area 2017-2018

Assessment Area: Greene County/Columbia County AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	8.6	42.9	48.6	0.0
Population by Geography	107,883	0.0	10.2	49.7	40.1	0.0
Housing Units by Geography	62,078	0.0	9.1	53.7	37.2	0.0
Owner-Occupied Units by Geography	31,402	0.0	5.9	49.8	44.3	0.0
Occupied Rental Units by Geography	11,467	0.0	24.0	46.6	29.4	0.0
Vacant Units by Geography	19,209	0.0	5.5	64.4	30.1	0.0
Businesses by Geography	7,154	0.0	17.1	45.4	37.5	0.0
Farms by Geography	509	0.0	3.9	45.0	51.1	0.0
Family Distribution by Income Level	27,786	17.4	15.1	19.4	48.1	0.0
Household Distribution by Income Level	42,869	19.7	15.2	16.4	48.7	0.0
Median Family Income Non-MSAs -- NY		\$59,570	Median Housing Value			\$206,664
			Median Gross Rent			\$872
			Families Below Poverty Level			8.3%

Source: 2015 ACS Census and 2018 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.

The Greene and Columbia AA had no major changes from the 2016 evaluation period. The unemployment rate for the Greene County is 4.5 percent, and Columbia County unemployment is 3.3 percent according to December 2017 US Department of Labor and Industry data. The New York state unemployment rate is 4.7 percent, and the U.S. Department of Labor and Industry national unemployment rate is 4.4 percent, comparatively.

TBOG ranks first in deposit market share in the Greene County/Columbia County AA at 31.47 percent according to the FDIC Deposit Market Share Report as of December 2017. TBOG's main competitors are KeyBank, NA (23.41 percent market share with nine branches), The National Union Bank of Kinderhook (11.17 percent market share with four branches), The National Bank of Coxsackie (7.33 percent market share with five branches), and Trustco Bank (5.46 percent market share with five branches).

Peer Mortgage Data as of December 2017 indicates that the TBOG had an 8.46 percent loan market share, and ranks 3rd among 218 lending institutions in the AA. TBOG's major competitors for mortgage lending in the AA are: Homestead Funding Corporation, ranked 1<sup>st</sup> with a 12.10 percent market share; Wells Fargo Bank, NA, ranked 2nd with an 8.80 percent market share; and Ulster Savings Bank, ranked 4th with a 6.69 percent market share.

## Ulster County 2016

Table A - Demographic Information of the Assessment Area 2016

Assessment Area: Ulster County AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	12.0	80.0	8.0	0.0
Population by Geography	86,636	0.0	13.7	78.0	8.3	0.0
Housing Units by Geography	40,785	0.0	13.6	77.4	9.0	0.0
Owner-Occupied Units by Geography	24,568	0.0	9.5	80.2	10.3	0.0
Occupied Rental Units by Geography	11,852	0.0	23.4	72.3	4.3	0.0
Vacant Units by Geography	4,365	0.0	10.1	75.7	14.2	0.0
Businesses by Geography	6,090	0.0	15.1	75.4	9.6	0.0
Farms by Geography	203	0.0	5.9	73.9	20.2	0.0
Family Distribution by Income Level	22,342	18.2	19.9	23.9	38.0	0.0
Household Distribution by Income Level	36,420	24.2	16.8	20.5	38.6	0.0
Median Family Income MSA - 28740 Kingston, NY MSA		\$70,513	Median Housing Value			\$227,076
			Median Gross Rent			\$926
			Families Below Poverty Level			5.4%

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.

The economy in the Ulster County AA is growing, as net hiring outpaces the state and country due in part to the proximity to New York City, and growing tourism sector, though many job gains are concentrated in low-wage industries. The major employment sectors in Ulster County are state and local government, education and healthcare services, retail trade, and leisure and hospitality. The major employers are Health Alliance of Hudson Valley, The State University of New York at New Paltz, Eastern New York Correctional Facility, Northeast Centre for Special Care, and Ulster-Greene ARC.

The unemployment rate for Ulster County was 4.4 percent according to the December 2016 US Department of Labor and Industry data. The New York state unemployment, and the U.S. Department of Labor and Industry national unemployment rates were 4.9 percent, comparatively.

Competition in the AA is high, and includes local community banks and branches of larger regional and national banks. TBOG ranked 16<sup>th</sup> in deposit market share in the Ulster County AA at 0.43 percent according to the FDIC Deposit Market Share Report as of December 31, 2016. TBOG's main competitors are Mid-Hudson Valley (28.38 percent market share with 1 branch), Ulster Savings Bank (13.3 percent market share with six branches), Bank of America, NA (9.73 percent market share with three branches), Rondout Savings Bank (9.58 percent market share with four branches), and TD Bank, NA (5.44 percent market share with one branch).

Peer Mortgage Data for 2016 indicated the TBOG had a 2.59 percent loan market share, and ranked 11<sup>th</sup> among 118 lending institutions in the AA. TBOG's major competitors for mortgage lending in the AA are Ulster Savings Bank, ranked 1<sup>st</sup> with a 15.35 percent market share; Mid-Hudson Valley Federal Credit Union, ranked 2<sup>nd</sup> with a 13.54 percent market share; and Rondout Savings Bank, ranked 3<sup>rd</sup> with a 7.9

percent market share.

## Ulster County 2017-2018

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	25	4.0	16.0	64.0	16.0	0.0
Population by Geography	85,997	5.3	11.2	66.9	16.5	0.0
Housing Units by Geography	39,941	5.8	10.7	66.2	17.2	0.0
Owner-Occupied Units by Geography	23,151	3.8	6.1	69.0	21.2	0.0
Occupied Rental Units by Geography	11,539	10.1	20.6	63.5	5.7	0.0
Vacant Units by Geography	5,251	5.4	9.4	60.1	25.2	0.0
Businesses by Geography	6,275	4.2	9.0	69.7	17.1	0.0
Farms by Geography	218	0.5	5.0	70.6	23.9	0.0
Family Distribution by Income Level	21,395	24.2	17.6	21.0	37.2	0.0
Household Distribution by Income Level	34,690	27.7	16.5	17.8	38.0	0.0
Median Family Income MSA - 28740 Kingston, NY MSA		\$74,546	Median Housing Value			\$205,168
			Median Gross Rent			\$1,022
			Families Below Poverty Level			7.9%

*Source: 2015 ACS Census and 2018 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.*

The Ulster County AA economy has not experienced any major changes from the 2016 evaluation period. The unemployment rate for Ulster County is 4.5 percent according to the December 2017 US Department of Labor and Industry data. Comparatively, the New York state unemployment rate is 4.7 percent, and the U.S. Department of Labor and Industry national unemployment rate is 4.9 percent.

TBOG ranks 15<sup>th</sup> in deposit market share for the Ulster County AA at 0.58 percent according to the FDIC Deposit Market Share Report as of 2017. TBOG's main competitors are Mid-Hudson Valley Credit Union (29.44 percent market share with one branch), Ulster Savings Bank (13.31 percent market share with six branches), Rondout Savings Bank (9.65 percent market share with four branches), Bank of America, NA (9.78 percent market share with three branches), and KeyBank, NA (5.47 percent market share with four branches).

TBOG's loan market share is 2.55 percent, and the Bank is ranked 8<sup>th</sup> among 128 lending institutions in the AA according to 2017 Peer Mortgage Data. TBOG's major competitors for mortgage lending in the AA are: Ulster Savings Bank, ranked 1<sup>st</sup> with a 17.55 market share; Mid-Hudson Valley Federal Credit Union, ranked 2<sup>nd</sup> with a 12.93 percent market share; and Rondout Savings Bank, ranked 3<sup>rd</sup> with a 9.98 percent market share.

## **Community Contacts**

We performed three interviews with community organizations in the area in order to determine the credit needs of the community. We conducted two of those interviews with a community development group and housing development group operating in Greene County. Another is an affordable housing partnership in Albany. The local economy was described as overall stable. Although the capital region in Albany has experience rapid expansion, Greene County has not experienced a spillover effect.

Contacts communicated the need for affordable and quality housing as a primary concern in the community. The contacts likewise cited housing rehabilitation and development as an area of opportunity for institutions in the area. One contact went on to cite infrastructure projects, increased access to public transportation, and sewer lines improvements, as an addition area of investment. Two contacts specifically named TBOG as a stalwart of community development in the region. One contact credits TBOG as the primary financer of local business revival in Catskill, New York.

## **Conclusions with Respect to Performance Tests in New York**

### **LENDING TEST**

TBOG's performance under the Lending Test in New York is Satisfactory.

Based on the full scope, the bank's lending performance in the state of New York is adequate.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the state.

#### ***Home Mortgage Loans***

The bank's loan originations reflect excellent distribution among geographies of different income levels throughout the bank's AAs. TBOG's performance meets the standard for outstanding performance. There were no conspicuous gaps identified within TBOG's AA's. We placed the most weight on the bank's performance in the Greene and Columbia County AA, as the majority of the bank's branches are located there. Additionally, we placed the greatest emphasis on lending to moderate-income borrowers, due to the relative lack of low-income census tracts within the bank's three AAs. The geographic distribution of loans in the Albany County AA was not applicable because 100 percent of the total geographies in this AA are middle-income.

#### ***Geographic Distribution in Greene/Columbia County AA***

The distribution of residential loans to borrowers reflects excellent dispersion based on Appendix D, Tables O3 and O4. TBOG exceeded the 7 percent of owner-occupied housing units in moderate income census tracts in 2016, with the number of loans made in the AA at 11.8 percent. There were no low-income census tracts in the AA during the evaluation period. TBOG exceeded the 5.9 percent of owner-occupied housing units in moderate-income census tracts at 12.8 percent during the 2017-2018 evaluation period. TBOG exceeded peer aggregate lending in moderate-income tracts in the AA for both the 2016, and 2017-2018 evaluation periods.



### ***Geographic Distribution in Ulster County AA***

The geographic distribution of the bank's home mortgage originations reflects excellent distribution in Ulster County based on the data in Table O5, and O6 in Appendix D. TBOG's geographic distribution of home mortgage originations reflects reasonable dispersion in 2016, and excellent dispersion in 2017-2018. In 2016, the bank's mortgage distribution was lower than the percentage of owner-occupied housing units and lower than peer aggregate. Given the bank's recent entry in the market in 2016, and lack of opportunity to lend to moderate-income borrowers, the bank's performance is reasonable. There were no low-income census tracts in the AA in 2016. TBOG's mortgage distribution to low-income tracts was excellent, exceeding the 3.8 percentage of owner-occupied housing units in low-income census tracts in 2017-2018. The Bank's mortgage distribution to moderate-income tracts was excellent, exceeding the 6.1 percent owner-occupied housing units in moderate-income census tracts, and 6.6 percent peer aggregate at 13.6 percent.

### ***Geographic Distribution in Albany County AA***

The geographic distribution of loans in the Albany County AA was not applicable because 100 percent of the total geographies in this AA are middle-income for the 2016, and 2017-2018 evaluation periods.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farm of different sizes, given the product line offered by the bank.

Overall, the distribution of loans to borrowers of different incomes reflects reasonable penetration in all three AAs. More weight was given to performance in the Greene and Columbia AA, where the majority of the bank's residential loans are originated or purchased. TBOG's record of lending to borrowers of different incomes meets the standard for satisfactory performance.

### ***Home Mortgage Loans***

#### ***Borrower Distribution in Greene/Columbia County AA***

TBOG's distribution of home mortgage loans reflects reasonable distribution among borrowers of different income levels based on Appendix C, Tables P3, and P4. The borrower distribution of mortgage loans in both the 2016, and 2017-2018 evaluation periods is reasonable.

The distribution of home mortgage loans in 2016 reflects reasonable penetration among borrowers of different income levels. In our analysis, we considered the affordability of home ownership for low-income families. The weighted average median cost of housing is \$207,005. According to the FFIEC, the adjusted median family income in the AA is \$56,045. A low-income family earns less than \$27,193, and a moderate-income family earns less than \$43,509. Seven percent of the population is below the poverty level. Hence, the cost of housing is over seven times low-income family earnings, and close to five times moderate-income family earnings. This lack of affordability limits the opportunity to originate home mortgage loans to low-income, and moderate-income borrowers. The bank's percentage of home mortgage loans made to low-income borrowers was less than the percentage of low-income families in the AA. However, when compared to the peer aggregate for low-income borrowers in the AA, TBOG

meets peer. The bank's percentage of home mortgage loans made to moderate-income borrowers was less than the percentage of moderate-income families in the AA. When compared to the peer aggregate for moderate-income borrowers in the AA, TBOG is below peer. Given the lack of opportunity to lend to low-income, and moderate-income borrowers, the bank's performance is reasonable.

During the 2017-2018 evaluation period, the distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels. The percentage of home mortgage loans made to low-income borrowers was less than the percentage of low-income families in the AA. The bank's percentage of home mortgage loans made to moderate-income borrowers was near the percentage of moderate-income families in the AA. When compared to the peer aggregate for low- and moderate-income borrowers in the AA, TBOG is near peer. Given the relative lack of home affordability for low- and moderate-income borrowers, the bank's performance is reasonable.

### ***Borrower Distribution in Ulster County***

TBOG's distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels based on Appendix D, Tables P5 and P6. The borrower distribution of mortgage loans in 2016, and 2017-2018 is reasonable.

The distribution of home mortgage loans in 2016 reflects reasonable penetration among borrowers of different income levels. We considered relative home ownership affordability in our analysis. The weighted average median cost of housing in the AA is \$227,076. According to the FFIEC, the adjusted median family income in the AA is \$70,513. A low-income family earns less than \$35,257, and a moderate-income family earns less than \$56,410. Hence, the cost of housing is over six times AA low-income family earnings, and over four times AA moderate-income family earnings. This limited housing affordability limits the bank's lending opportunities in the AA. TBOG made no loans to low-income borrowers. The bank's loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA. The bank is also below the peer aggregate of 17.8 percent with lending of 7.9 percent to moderate-income families.

The distribution of home mortgage loans reflects reasonable penetration among borrowers of different income levels during the 2017-2018 evaluation period. The percentage of loans made to low- and moderate-income borrowers is lower than the percentage of low- and moderate-income families in the AA. When compared to the peer aggregate for low- and moderate-income borrowers in the AA, TBOG is lower than peer. Given the lack of opportunity to lend to low-income and moderate-income borrowers, the bank's performance is reasonable.

### ***Borrower Distribution in Albany County AA***

TBOG's distribution of home mortgage loans reflects excellent penetration among borrowers of different income levels. The borrower distribution of mortgage loans in 2016 was excellent. The Bank originated 12 loans in this AA in 2017-2018. This is not sufficient for a meaningful analysis. Hence, our conclusions were based on performance in 2016.

The distribution of loans reflects excellent distribution among borrowers of different income levels during the 2016 evaluation period. The percentage of loans made to low-income borrowers is near the percentage of low-income families in the AA. Loans to moderate-income borrowers surpassed the 22.0 percent of

families in that income category. TBOG exceeded peer lending to low- and moderate-income borrowers in the AA.

### **Responses to Complaints**

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

### **COMMUNITY DEVELOPMENT TEST**

TBOG's performance under the CD test in the State of New York is rated satisfactory.

Based on a full-scope review, the bank exhibits adequate responsiveness to the needs of the community. Factors supporting this conclusion include the institution's adequate record regarding qualified CD loans, donations and services, and appropriate responsiveness to CD needs. The bank showed adequate responsiveness to its AAs through its CD loans. During the evaluation period, the bank originated or renewed 21 loans totaling \$8,895,285 to 19 organizations, which qualify as CD organizations. Two loans were originated outside the bank's AAs, but within the broader regional area. The bank originated loans to CD organizations providing a variety of services to low-and moderate-income communities including: affordable housing, economic relief, healthcare, schooling, and economic development, including loans to small businesses.

CD activity in the Greene/Columbia County AA meets the standard for adequate responsiveness. The bank originated 52 percent of their 25 CD loans in Green and Columbia County AA. This included 13 loans totaling \$6,794,872.

CD activity in the Ulster County AA meets the standard for adequate responsiveness. TBOG originated six loans totaling \$1,202,209 in the Ulster County AA. This activity is adequate considering the growth, and high competition in the AA.

CD activity within the Albany AA meets the criteria for adequate responsiveness, considering the limited size of the AA. TBOG originated four loans totaling \$550,000 in the Albany County AA.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Greene/Columbia County	-	-	101	269	101	70%	269	93%	-	-
Ulster County	-	-	35	16.4	35	24%	16.4	6%	-	-
Albany County	-	-	4	1.8	4	3%	1.8	1%	-	-
Outside AA	-	-	4	1.9	4	3%	1.9	1%	-	-

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

TBOG demonstrated adequate responsiveness to its AAs through donation and qualified investments. The bank made 139 qualified donations and contributions totaling \$75,950 to 83 qualified community development organizations. The bank made 96 qualified donations to CD organizations within the Greene County – Columbia County AA, totaling \$55,950; the bank made 35 donations to organizations within the Ulster County AA, totaling \$16,400; the bank made four donations to organizations within the Albany County AA, totaling \$1,750; the bank made four donations to organizations based outside the AA but whose impact affects the broader regional area, including the TBOG AA, and these donations totaled \$1,850. In addition, the bank maintained five qualifying investments totaling \$212,950 to the Town of Catskill during the evaluation period. The purpose of the bond is for the extension, improvement, and repair of a water line located in a moderate-income geography.

### Extent to Which the Bank Provides Community Development Services

TBOG demonstrates excellent responsiveness to the service needs of its AAs through CD services. Four of the bank's employees provided 300 hours of financial related services to four qualified organizations in 2018. Nine bank-employees also provided 468 hours of board level supervision to 11 qualified organizations. All qualifying organizations serve the Greene County- Columbia County AA. These organizations provide housing and community services to low- and moderate- income communities as well as promote economic development within the AA. TBOG maintains four branches in moderate-income census tracts.

### Responsiveness to Community Development Needs

TBOG demonstrates adequate responsiveness to the community development needs of its AAs through community development loans, qualified investments and donations, and services. Since the last CRA examination completed in August of 2016, the bank has significantly increased its community development loans and donations, and increased CD services.

## 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): (01/01/16 to 12/31/18) Investment and Service Tests and CD Loan: (08/16/16 to 12/31/18)	
Financial Institution	Products Reviewed	
The Bank of Greene County (TBOG) Catskills, NY	Mortgage loans, CD loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Greene County Commercial Bank Greene Property Holdings	Subsidiary Subsidiary	CD loans, investments
<b>List of Assessment Areas and Type of Examination</b>		
Assessment Area	Type of Exam	Other Information
Albany County AA MSA 10580	Full-Scope	Partial County of Albany, NY
Greene County/Columbia Counties AA Non-MSA	Full-Scope	Counties of Greene and Columbia, NY
Ulster County AA MSA 28740	Full-Scope	Partial County of Ulster, NY

## Appendix B: Summary of MMSA and State Ratings

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RATINGS      The Bank of Greene County			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
The Bank of Greene County	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
New York	Satisfactory	Satisfactory	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope 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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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-Scope 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:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.



**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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 1 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.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which result from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included:

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents aggregate peer data for the years the data is available.

**Table O1: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016**

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	
Albany County AA	21	2,005	100.0	299	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>21</b>	<b>2,005</b>	<b>100.0</b>	<b>299</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table O2: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18**

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	
Albany County AA	12	1,329	100.0	307	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>12</b>	<b>1,329</b>	<b>100.0</b>	<b>307</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

**Table O3: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016**

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
Greene County_Clolumbia County AA	321	55,506	100.0	2,526	0.0	0.0	0.0	7.0	11.8	6.9	44.9	56.1	46.2	48.1	32.1	46.9	0.0	0.0	0.0
<b>Total</b>	<b>321</b>	<b>55,506</b>	<b>100.0</b>	<b>2,526</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>7.0</b>	<b>11.8</b>	<b>6.9</b>	<b>44.9</b>	<b>56.1</b>	<b>46.2</b>	<b>48.1</b>	<b>32.1</b>	<b>46.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table O4: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18**

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
Greene County_Clolumbia County AA	587	96,361	100.0	2,622	0.0	0.0	0.0	5.9	12.8	6.8	49.8	61.3	51.9	44.3	25.9	41.3	0.0	0.0	0.0
<b>Total</b>	<b>587</b>	<b>96,361</b>	<b>100.0</b>	<b>2,622</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.9</b>	<b>12.8</b>	<b>6.8</b>	<b>49.8</b>	<b>61.3</b>	<b>51.9</b>	<b>44.3</b>	<b>25.9</b>	<b>41.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

**Table O5: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016**

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
Ulster County AA	38	6,264	100.0	1,544	0.0	0.0	0.0	9.5	5.3	10.0	80.2	81.6	79.7	10.3	13.2	10.4	0.0	0.0	0.0
<b>Total</b>	<b>38</b>	<b>6,264</b>	<b>100.0</b>	<b>1,544</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.5</b>	<b>5.3</b>	<b>10.0</b>	<b>80.2</b>	<b>81.6</b>	<b>79.7</b>	<b>10.3</b>	<b>13.2</b>	<b>10.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table O6: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18**

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
Ulster County AA	22	4,436	100.0	1,493	3.8	4.5	4.1	6.1	13.6	6.6	69.0	68.2	69.5	21.2	13.6	19.8	0.0	0.0	0.0
<b>Total</b>	<b>22</b>	<b>4,436</b>	<b>100.0</b>	<b>1,493</b>	<b>3.8</b>	<b>4.5</b>	<b>4.1</b>	<b>6.1</b>	<b>13.6</b>	<b>6.6</b>	<b>69.0</b>	<b>68.2</b>	<b>69.5</b>	<b>21.2</b>	<b>13.6</b>	<b>19.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table P1: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016**

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
Albany County AA	21	2,005	100.0	299	16.8	14.3	11.7	22.0	33.3	25.1	30.5	19.0	19.4	30.7	28.6	26.8	0.0	4.8	17.1
<b>Total</b>	<b>21</b>	<b>2,005</b>	<b>100.0</b>	<b>299</b>	<b>16.8</b>	<b>14.3</b>	<b>11.7</b>	<b>22.0</b>	<b>33.3</b>	<b>25.1</b>	<b>30.5</b>	<b>19.0</b>	<b>19.4</b>	<b>30.7</b>	<b>28.6</b>	<b>26.8</b>	<b>0.0</b>	<b>4.8</b>	<b>17.1</b>

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

**Table P2: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18**

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
Albany County AA	12	1,329	100.0	307	17.4	33.3	12.1	22.9	8.3	25.4	25.7	8.3	31.9	34.0	41.7	19.2	0.0	8.3	11.4
<b>Total</b>	<b>12</b>	<b>1,329</b>	<b>100.0</b>	<b>307</b>	<b>17.4</b>	<b>33.3</b>	<b>12.1</b>	<b>22.9</b>	<b>8.3</b>	<b>25.4</b>	<b>25.7</b>	<b>8.3</b>	<b>31.9</b>	<b>34.0</b>	<b>41.7</b>	<b>19.2</b>	<b>0.0</b>	<b>8.3</b>	<b>11.4</b>

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table P3: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016**

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
Greene County _Cloumbia Cou nty AA	321	55,506	100.0	2,526	16.0	2.2	2.5	16.5	7.5	11.3	19.4	17.4	20.5	48.1	54.8	52.1	0.0	18.1	13.7
<b>Total</b>	<b>321</b>	<b>55,506</b>	<b>100.0</b>	<b>2,526</b>	<b>16.0</b>	<b>2.2</b>	<b>2.5</b>	<b>16.5</b>	<b>7.5</b>	<b>11.3</b>	<b>19.4</b>	<b>17.4</b>	<b>20.5</b>	<b>48.1</b>	<b>54.8</b>	<b>52.1</b>	<b>0.0</b>	<b>18.1</b>	<b>13.7</b>

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

**Table P4: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18**

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
Greene County _Cloumbia Cou nty AA	587	96,361	100.0	2,622	17.4	3.2	3.5	15.1	11.1	11.9	19.4	16.5	21.1	48.1	52.8	52.7	0.0	16.4	10.8
<b>Total</b>	<b>587</b>	<b>96,361</b>	<b>100.0</b>	<b>2,622</b>	<b>17.4</b>	<b>3.2</b>	<b>3.5</b>	<b>15.1</b>	<b>11.1</b>	<b>11.9</b>	<b>19.4</b>	<b>16.5</b>	<b>21.1</b>	<b>48.1</b>	<b>52.8</b>	<b>52.7</b>	<b>0.0</b>	<b>16.4</b>	<b>10.8</b>

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0



**Table P5: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016**

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
Ulster County AA	38	6,264	100.0	1,544	18.2	0.0	7.2	19.9	7.9	17.8	23.9	21.1	25.6	38.0	39.5	38.6	0.0	31.6	10.8
<b>Total</b>	<b>38</b>	<b>6,264</b>	<b>100.0</b>	<b>1,544</b>	<b>18.2</b>	<b>0.0</b>	<b>7.2</b>	<b>19.9</b>	<b>7.9</b>	<b>17.8</b>	<b>23.9</b>	<b>21.1</b>	<b>25.6</b>	<b>38.0</b>	<b>39.5</b>	<b>38.6</b>	<b>0.0</b>	<b>31.6</b>	<b>10.8</b>

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

**Table P6: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18**

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
Ulster County AA	22	4,436	104.8	1,493	24.2	0.0	6.0	17.6	9.1	20.0	21.0	27.3	24.6	37.2	36.4	40.3	0.0	27.3	9.1
<b>Total</b>	<b>22</b>	<b>4,436</b>	<b>104.8</b>	<b>1,493</b>	<b>24.2</b>	<b>0.0</b>	<b>6.0</b>	<b>17.6</b>	<b>9.1</b>	<b>20.0</b>	<b>21.0</b>	<b>27.3</b>	<b>24.6</b>	<b>37.2</b>	<b>36.4</b>	<b>40.3</b>	<b>0.0</b>	<b>27.3</b>	<b>9.1</b>

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0