



## **PUBLIC DISCLOSURE**

March 25, 2019

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Walkkill Valley FS & LA  
Charter Number #702528

23 Walkkill Avenue  
Walkkill, NY 12589-3103

Office of the Comptroller of the Currency

340 Madison Avenue  
New York, NY 10017

**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 overall rating is based primarily on the following factors:

- The bank's average net loan-to-deposit ratio is more than reasonable.
- The bank originates a majority of its primary lending product inside its assessment area (AA).
- The distribution of home mortgage loans to borrowers of different income levels, including low- and moderate-income (LMI) individuals, is reasonable.

## 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

Wallkill Valley Federal Savings and Loan Association (Wallkill or bank) was founded in 1913 and is a federally chartered savings association headquartered in Wallkill, New York (NY). As of December 31, 2017, the as of date of this Performance Evaluation (PE), Wallkill had total assets of \$324.6 million. Total assets as of December 31, 2018 were \$321.8 million. Wallkill is a single-state institution, primarily serving Orange and Ulster counties in NY.

The bank has one AA that includes its main office and all branch locations. The bank operates eight full-service branches located in the towns of Wallkill, Milton, Highland Falls, Maybrook, Walden, Montgomery, Monroe, and Otisville, NY and offers a full line of traditional banking products and services. In August 2017, Wallkill acquired Hometown Bank of the Hudson Valley (Hometown Bank). As part of the acquisition, Wallkill inherited four of the eight full-service branches listed above, including those in Montgomery, Monroe, Otisville, and Walden, NY. These branches are included in the bank's one AA. The bank did not close any branches during the evaluation period. There are full-service automated teller machines (ATMs) located in all full-service branch locations with the exception of the Otisville branch.

Wallkill offers traditional loan and deposit products. Loan products include consumer loans, home equity loans, home equity lines of credit, mortgage loans, and commercial loans. As of December 31, 2017, Wallkill reported total assets of \$324.6 million, with \$257.4 million in net loans and leases representing 79.3 percent of total assets, and \$250.3 million in total deposits. The bank's primary product is residential loans. Residential real estate loans represented 65.7 percent of the loan portfolio. Net loans increased \$126.4 million since December 31, 2013, the end of the last evaluation period. Tier 1 leverage capital as of December 31, 2017 was 8.85 percent.

Wallkill competes with many other financial institutions that operate on the local, regional, and national level. By deposit market share, the bank ranks 12<sup>th</sup> out of 28 institutions located within the Orange and Ulster county area. According to the FDIC Deposit Market Share Report as of June 30, 2018, the bank has a deposit market share of 2.28 percent. Wallkill's lending market is also competitive. In 2017, Wallkill ranked 32<sup>nd</sup> of 290 lenders in total number of loans made in the AA.

There are no legal, financial, or other factors impeding Wallkill's ability to help meet the credit needs in its AA. The bank received an overall rating of "Outstanding" in the previous CRA PE dated February 10, 2014.



## **Scope of the Evaluation**

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

The evaluation period of this PE is January 1, 2015 through December 31, 2017. We completed the lending test in order to evaluate Walkill's record of meeting the credit needs of its AA. Walkill's primary product is residential home mortgage loans, based on the bank's strategy and loan originations from 2015 to 2017. The lending test includes residential home mortgage loan originations within the evaluation period. Due to changes in census data effective in 2017, we evaluated the bank's 2017 lending performance separately from the bank's 2015 and 2016 lending performance. The separation is due to adjustments to income categorization following the results of the 2015 American Community Service (ACS) survey conducted by the U.S. Census Bureau.

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

Walkill's current AA consists of three contiguous counties in NY State; Dutchess, Orange and Ulster. However, Dutchess County is not included in the scope of this evaluation. The AA expanded to include Dutchess County in August 2017, when the bank acquired Hometown Bank and its four branches located in Montgomery, Monroe, Otisville, and Walden, NY. When an AA is new to a surviving bank as a result of a merger or acquisition, at least six months of lending data from the non-surviving bank is required to perform a meaningful CRA analysis. Due to the timing of Walkill's acquisition of Hometown Bank (August 11, 2017) in relation to the CRA evaluation period end date (December 31, 2017), a full six months of lending data was not available for Hometown Bank. Dutchess County will be included as part of the AA for the bank's next CRA evaluation.

For the purpose of this exam, Walkill's AA consists of Orange and Ulster Counties. Both counties are within the state of NY and fall within the New York-Newark, NY-NJ-CT-PA Combined Statistical Area (CSA) #408. Orange County is part of the New York-Jersey City-White Plains, NY-NJ Metropolitan Division (MD) #35614, which is part of the New York-Newark-Jersey City, NY-NJ-PA Metropolitan Statistical Area (MSA) #35620. Ulster County falls within the Kingston, NY MSA #28740. The AA includes geographies where the bank has its main office, branches, and deposit-taking ATMs, as well as surrounding geographies where the bank conducts lending transactions. We performed a full-scope review of the New York-Newark, NY-NJ-CT-PA CSA #408. Please refer to the tables in Appendix A for demographic information on the AA.

### **Ratings**

The bank's overall rating is based on the areas that received full-scope reviews.

## **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.

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

### **LENDING TEST**

Wallkill's performance under the lending test is satisfactory. Wallkill has a more than reasonable loan-to-deposit ratio. A majority of Wallkill's home mortgage loans were made inside the bank's AA.

The distribution of the bank's home mortgage loans to borrowers of different income levels is reasonable. More weight was given to the bank's performance relative to the aggregate distribution of loans, as the median family income of \$74,546 in the Kingston, NY MRA and \$72,047 in the New York-New Jersey-White Plains, NY-NJ MD is low compared to the median housing value of \$243,792 in the AA. Further, competition is heavy in the area. The distribution of the bank's home mortgage loans to census tracts of different income levels is poor. We weighed the bank's lending to borrowers of different income levels more heavily in our evaluation of the bank's overall lending performance. The bank's AA has a low level of owner occupied housing units in LMI census tracts. Therefore, the bank has limited opportunities to lend in LMI census tracts and less weight was given to the bank's geographic distribution of loans.

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

Wallkill's quarterly loan-to-deposit ratio is more than reasonable. In the 17 quarters since the prior CRA evaluation (the first quarter of 2014 to the first quarter of 2019), the bank's average quarterly loan-to-deposit ratio was 105.52 percent. During this period, the bank's loan-to-deposit ratio ranged from a low of 101.06 percent as of June 30, 2014 to a high of 112.45 percent as of March 31, 2016.

Wallkill's average loan-to-deposit ratio exceeds similarly situated peer institutions of similar size, location, and product offerings. Wallkill's average loan-to-deposit ratio ranks highest among the average loan-to-deposit ratio of four other similarly situated institutions. The aggregate average loan-to-deposit ratio for the four peer institutions over the same period was 64.36 percent.

### **Lending in Assessment Area**

Based on the data in Table 1 of Appendix C, we concluded that by number and dollar volume, Wallkill originated a majority of home mortgage loans inside its AA throughout the evaluation period. Wallkill originated 303 home mortgage loans totaling \$71.76 million during the evaluation period. Of these 303 home mortgage loans, 80.9 percent of loans by numerical volume and 75.4 percent of loans by dollar volume were originated in the bank's AA.

### **Lending to Borrowers of Different Incomes**

Based on the data in Tables 2 and 3 in Appendix C, we concluded that the bank's distribution of home mortgage loan originations by income category of the borrower in the AA is reasonable.

For 2015 and 2016, the distribution of the bank's home mortgage loans to LMI borrowers is reasonable. The proportion of bank loans to low-income borrowers was significantly weaker than the proportion of low-income families in the AA, and the proportion of bank loans to moderate-income borrowers was comparable to the proportion of moderate-income families. The bank's home mortgage lending was comparable to the aggregate distribution of loans to low-income borrowers, and comparable to the aggregate distribution of loans to moderate-income borrowers.

For 2017, the distribution of the bank's home mortgage loans to LMI borrowers is reasonable. The proportion of bank loans to low-income borrowers was significantly weaker than the proportion of low-income families in the AA, and the proportion of bank loans to moderate-income families was comparable to the proportion of moderate-income families. The bank's home mortgage lending was comparable to the aggregate distribution of loans to low-income borrowers, and comparable to the aggregate distribution of moderate-income borrowers.

More weight was given to the bank's performance relative to the aggregate distribution of loans, as the median family income of \$74,546 in the Kingston, NY MRA and \$72,047 in the New York-New Jersey-White Plains, NY-NJ MD is low compared to the median housing value of \$243,792 in the AA. Further, competition is heavy in the area.

### **Geographic Distribution of Loans**

Based on the data in Tables 4 and 5 in Appendix C, and the following performance context considerations, we concluded that the bank's geographic distribution of home mortgage loan originations is poor.

For 2015 and 2016, the distribution of the bank's home mortgage loans in LMI geographies is poor. The proportion of bank loans to borrowers in low-income tracts was weaker than the proportion of owner-occupied housing units in low-income geographies. The proportion of bank loans to borrowers in moderate-income tracts was significantly weaker than the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending was weaker than the aggregate distribution of loans in LMI geographies.

For 2017, the distribution of the bank's home mortgage loans in LMI geographies is poor. The proportion of bank loans to borrowers in low-income tracts was weaker than the proportion of owner-occupied housing units in low-income geographies. The proportion of bank loans to borrowers in moderate-income tracts was weaker than the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending was weaker than the aggregate distribution of loans in LMI geographies.

Less weight was given to the bank's lending performance relative to the geographic distribution of loans. The bank's AA has a low level of owner occupied housing units in LMI census tracts. There are only six low-income census tracts and 18 moderate-income census tracts in the AA. The bank has limited opportunities to lend in LMI census tracts.

### **Responses to Complaints**

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

## Appendix A: Scope of Examination

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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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/15 to 12/31/16 Lending Test (excludes CD loans): 01/01/17 to 12/31/17	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Walkkill Valley Federal Savings and Loan Association Walkkill, NY		Residential home mortgage loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
New York-Newark, NY-NJ-CT-PA CSA #408	Full-Scope	

## Appendix B: Community Profiles for Full-Scope Areas

### New York-Newark, NY-NJ-CT-PA Combined Statistical Area (CSA) #408

Demographic Information for Full-Scope Area: 2017 – Wallkill AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	126	4.8	14.3	36.5	44.4	0.0
Population by Geography	556,684	5.4	11.7	33.2	49.8	0.0
Owner-Occupied Housing by Geography	134,092	1.8	7.6	35.8	54.8	0.0
Businesses by Geography	34,531	5.4	11.0	35.2	48.4	0.0
Farms by Geography	1,392	0.4	4.4	31.9	63.4	0.0
Family Distribution by Income Level	132,130	19.5	14.7	19.0	46.8	0.0
Household Distribution by Income Level	194,744	23.3	14.1	16.5	46.1	0.0
Median Family Income MSA – 28740 Kingston, NY MSA	\$74,546	Median Housing Value				\$243,792
Median Family Income MSA – 35614 New York-Jersey City-White Plains, NY-NJ MD	\$72,047	Families Below Poverty Level				8.6%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2015 ACS U.S. Census, and 2017 D&B Data.

Wallkill identified Orange County and Ulster County in the State of NY as its AA. Orange County and Ulster County are both located within the New York-Newark, NY-NJ-CT-PA CSA #408. Orange County is part of the New York-Jersey City-White Plains, NY-NJ MD #35614, which is part of the New York-Newark-Jersey City, NY-NJ-PA MSA #35620. Ulster County falls within the Kingston, NY MSA #28740. The AA meets regulatory requirements and does not arbitrarily exclude LMI geographies. The AA consists of a contiguous geography surrounding Wallkill's main office, branches, ATMs and areas where the bank conducts lending transactions.

Wallkill designates 126 census tracts in Orange County and Ulster County as its AA. The AA includes six low-income census tracts (4.8 percent), 18 moderate-income census tracts (14.3 percent), 46 middle-income census tracts (36.5 percent), and 56 upper-income census tracts (44.4 percent). According to 2015 U.S. Census data, the total population of the AA is 556,684. Orange and Ulster Counties consist of 132,130 families of which 19.5 percent of families are low-income, 14.7 percent of families are moderate-income, 19 percent of families are middle-income, and 46.8 percent of families are upper-income. The median family incomes for the New York-Newark-Jersey City, NY-NJ-PA MSA and Kingston, NY MSA are \$72,047 and \$74,546 respectively.

The median housing value in the CSA is \$243,792. Within the AA, 134,092 housing units were owner-occupied, representing 60.2 percent of total housing in the AA. A majority of owner-occupied units are in middle- and upper-income tracts at 35.8 percent and 54.8 percent, respectively. Approximately 8.6 percent of families are below the poverty level, with 40.9 percent of low-income tract households below the poverty level.

The AA includes 34,531 businesses and 1,392 farms. Approximately 5.4 percent of business are located within low-income CTs, 11.0 percent of businesses are located in moderate-income CTs, 35.2 percent of businesses are located within middle-income CTs, and 48.4 percent of businesses are located in upper-income CTs. Approximately 0.4 percent of farms are located within low-income CTs, 4.4 percent of farms are located in moderate-income CTs, 31.9 percent of farms are located in middle-income CTs and 63.4 percent of farms are located within upper-income CTs.

A majority of businesses in the AA are in the service industry. Within the AA, 15,874 businesses, or 44.2 percent of all businesses, are in the service industry. Additional industries in the AA include retail trade (15.9 percent), construction (9.2 percent), and finance (6.6 percent). According to the U.S. Bureau of Labor Statistics, the unemployment rate in Orange County and Ulster County is 4.4 and 4.5 percent respectively, exceeding the national average of 3.9 percent.

The banking market in Orange and Ulster Counties is competitive. The market is composed of numerous small, mid-size, and large banks. According to the 2018 FDIC Summary of Deposits Market Share Report for Orange and Ulster counties, Wallkill ranks 12<sup>th</sup> in overall deposit market share with 2.28 percent of total deposits. Keybank National Association ranked first with 17.19 percent of deposits and JP Morgan Chase Bank ranked second with 13.7 percent of deposits.

To gain a better understanding of the AA and performance context, we interviewed two community contacts within the bank's AA. Based on our discussion, affordable housing continues to be a primary need in the community and has a cascading financial effect on economic and community development within the AA.



## Appendix C: Tables

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
Home Mortgage											
2015	78	80.4	19	19.6	97	19,785	76.7	6,021	23.3	25,806	
2016	66	82.5	14	17.5	80	13,522	69.3	5,997	30.7	19,519	
2017	101	80.2	25	19.8	126	20,775	78.6	5,658	21.4	26,433	
<b>Subtotal</b>	<b>245</b>	<b>80.9</b>	<b>58</b>	<b>19.1</b>	<b>303</b>	<b>54,082</b>	<b>75.4</b>	<b>17,676</b>	<b>24.6</b>	<b>71,758</b>	

*Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data  
Due to rounding, totals may not equal 100.0*

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
Wallkill AA-Orange and Ulster	144	33,307	100.0	10,371	17.5	2.8	3.4	15.1	11.1	13.4	20.3	19.4	23.8	47.1	47.2	45.1	0.0	19.4	14.3
<b>Total</b>	<b>144</b>	<b>33,307</b>	<b>100.0</b>	<b>10,371</b>	<b>17.5</b>	<b>2.8</b>	<b>3.4</b>	<b>15.1</b>	<b>11.1</b>	<b>13.4</b>	<b>20.3</b>	<b>19.4</b>	<b>23.8</b>	<b>47.1</b>	<b>47.2</b>	<b>45.1</b>	<b>0.0</b>	<b>19.4</b>	<b>14.3</b>

*Source: 2010 U.S. Census; 01/01/2015 - 12/30/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table 3 - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017</b>
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	
Wallkill AA-Orange and Ulster	101	20,775	100.0	10,755	19.5	4.0	3.2	14.7	11.9	14.4	19.0	22.8	24.0	46.8	46.5	46.1	0.0	14.9	12.3	
<b>Total</b>	<b>101</b>	<b>20,775</b>	<b>100.0</b>	<b>10,755</b>	<b>19.5</b>	<b>4.0</b>	<b>3.2</b>	<b>14.7</b>	<b>11.9</b>	<b>14.4</b>	<b>19.0</b>	<b>22.8</b>	<b>24.0</b>	<b>46.8</b>	<b>46.5</b>	<b>46.1</b>	<b>0.0</b>	<b>14.9</b>	<b>12.3</b>	

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

<b>Table 4 - Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2015-16</b>
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	
Wallkill AA - Orange and Ulster	144	33,307	100.0	10,371	1.2	0.7	3.5	7.7	2.1	6.0	39.0	56.9	35.4	52.2	40.3	55.1	0.0	0.0	0.0	
<b>Total</b>	<b>144</b>	<b>33,307</b>	<b>100.0</b>	<b>10,371</b>	<b>1.2</b>	<b>0.7</b>	<b>3.5</b>	<b>7.7</b>	<b>2.1</b>	<b>6.0</b>	<b>39.0</b>	<b>56.9</b>	<b>35.4</b>	<b>52.2</b>	<b>40.3</b>	<b>55.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2010 U.S. Census; 01/01/2015 - 12/30/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table 5 - 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
Wallkill AA - Orange and Ulster	101	20,775	100.0	10,755	1.8	1.0	3.6	7.6	4.0	6.9	35.8	35.6	32.9	54.8	59.4	56.7	0.0	0.0	0.0
<b>Total</b>	<b>101</b>	<b>20,775</b>	<b>100.0</b>	<b>10,755</b>	<b>1.8</b>	<b>1.0</b>	<b>3.6</b>	<b>7.6</b>	<b>4.0</b>	<b>6.9</b>	<b>35.8</b>	<b>35.6</b>	<b>32.9</b>	<b>54.8</b>	<b>59.4</b>	<b>56.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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