



## **PUBLIC DISCLOSURE**

July 7, 2025

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

The Delaware National Bank of Delhi  
Charter Number: 1323

124 Main Street  
Delhi, NY 13753

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132  
East Syracuse, NY 13057

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Contents

Overall CRA Rating .....	1
Description of Institution .....	2
Scope of the Evaluation .....	2
Discriminatory or Other Illegal Credit Practices Review .....	3
State Rating .....	4
State of New York .....	4
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of State Ratings .....	B-1
Appendix C: Definitions and Common Abbreviations .....	C-1
Appendix D: Tables of Performance Data .....	D-1

## Overall CRA Rating

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

**The Lending Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on The Delaware National Bank of Delhi's (DNBD or bank) performance in the state of New York, which demonstrated an excellent distribution of loans to geographies of different income levels and an excellent distribution of loans to borrowers of different income levels.
- DNBD's loan-to-deposit (LTD) ratio is reasonable based on the bank's size, financial condition, and credit needs of the assessment area (AA).
- The bank originated and purchased a substantial majority of loans inside the AA during the evaluation period.
- The bank did not have any consumer complaints regarding its Community Reinvestment Act (CRA) performance during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio was reasonable. DNBD's average LTD ratio for the 12-quarter period following the date of the prior evaluation period, January 1, 2022, through the end of the current evaluation period, December 31, 2024, was 73.6 percent. In comparison, a custom peer group of three similarly situated banks operating in or near the AA, had average quarterly LTD ratios ranging from 48.1 percent to 82 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans were inside its AA.

The bank originated and purchased 90.3 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	383	90.54	40	9.46	423	64,651	89.98	7,202	10.02	71,853
Consumer	80	88.89	10	11.11	90	898	89.09	110	10.91	1,008
<b>Total</b>	<b>463</b>	<b>90.25</b>	<b>50</b>	<b>9.75</b>	<b>513</b>	<b>65,549</b>	<b>89.96</b>	<b>7,312</b>	<b>10.04</b>	<b>72,861</b>

*Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

DNBD is a single state community bank headquartered in Delhi, NY. As of December 31, 2024, the bank had total assets of \$368 million. DNBD is wholly owned by Delhi Bank Corp, a single bank holding company also headquartered in Delhi, NY.

DNBD offered a variety of traditional residential mortgage, consumer, commercial, and agricultural banking products and services, as well as trust services during the evaluation period. The bank also offered specialized lending products of no-closing-cost refinancing for commercial and residential mortgages and Agricultural loans, which consist primarily of the guaranteed portion of loans purchased from the U.S. Department of Agriculture (USDA) Rural Development Program, Small Business Administration (SBA) and Farm Service Agency (FSA). In addition, the bank offered online and mobile banking services and features including deposit transfer (internal and external), remote deposit capture, personal payment services, and bill pay.

As of December 31, 2024, DNBD had \$257 million in gross loans representing 69.8 percent of average assets. The bank's loan portfolio mix consisted of 55.8 percent residential real estate loans, 27.4 percent agriculture and farmland loans, 11.3 percent commercial real estate loans, 4.1 percent commercial and industrial loans, and 1.3 percent consumer loans. Deposits and tier 1 capital totaled \$335 million and \$38 million, respectively.

DNBD had no legal, financial, or other impediments hindering its ability to help meet the credit needs in its AA. DNBD's last CRA evaluation was dated July 5, 2022, at which time the bank's performance was rated "Satisfactory".

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated DNBD's performance using small bank examination procedures, which includes the Lending Test. The Lending Test evaluated the bank's record of meeting the credit needs of its AA through its primary lending products, home mortgage and consumer loans. Home mortgage and consumer loans represented 47 percent and 48 percent of the total number of loans originated during the evaluation period, respectively. The evaluation period covered January 1, 2022, through December 31, 2024. The OCC assessed 2022, 2023, and 2024 lending activities against the 2020 U.S. Census data.

DNBD was not required to maintain loan data in accordance with the Home Mortgage Disclosure Act (HMDA) during the evaluation period. Management voluntarily maintained an application register but does not submit this data. The OCC validated the accuracy of the data and determined it could be relied upon for purposes of the CRA evaluation. The evaluation is based on all home mortgage origination activity and a sample of consumer loans originated during the evaluation period.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined

statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

DNBD’s overall rating is based on its performance in the state of New York. The State Rating is based on the full-scope review of the bank’s NY Non MSA AA.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, as applicable.

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

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

## State Rating

### State of New York

**CRA rating for the State of New York:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- The bank had an excellent distribution of loans to geographies of different income levels within the AA.
- The bank had an excellent distribution of loans to borrowers of different income levels within the AA.
- The bank did not receive any CRA related complaints during the evaluation period.

### Description of Institution's Operations in New York

As of December 31, 2024, DNBD had one AA within the state of New York, the NY Non MSA AA. The AA encompassed Delaware and Otsego counties and consisted of 40 contiguous census tracts: 18 in Delaware County and 22 in Otsego County. There were no low-income census tracts, six moderate-income census tracts, 28 middle-income census tracts, five upper-income census tracts, and one unknown census tract. According to the Federal Financial Institutions Examination Council's (FFIEC) list of distressed and underserved tracts, there were no census tracts designated as distressed or underserved in the AA. The AA met the requirements of the CRA and did not arbitrarily exclude low- or moderate-income census tracts.

DNBD offered a full range of non-complex loan and deposit products and services through its main office and three branches located in Delaware County. The bank also maintained two loan production offices in Otsego County; however, the office in Oneonta was closed in September of 2022. All the bank's branches had an automated teller machine (ATM), one of which was deposit-taking.

DNBD does not operate in a competitive financial services market. Competition from other financial institutions is low as only five institutions with 34 offices and \$2.5 billion in total deposits operate in the AA. According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Market Share Report, DNBD ranked fourth amongst competitors in its AA with a deposit market share of 13.1 percent. NBT Bank, National Association had the highest market share of deposits at 34.9 percent, followed by Wayne Bank at 24.4 percent, and Community Bank, National Association at 21.9 percent. DNBD did not have any deposits from outside the AA.

Economic conditions in the AA remain relatively stable. The OCC considered the poverty level, local industry, and unemployment rate across the AA in the evaluation of lending performance. Households and families living below the poverty level in the AA represented 13.89 percent and 10.5 percent, respectively. Per U.S. Census data, educational services, health care, and social assistance are the most

prominent industries in Delaware and Otsego counties. The unemployment rate within the AA represented 5.12 percent.

The OCC reviewed one community contact and two community needs assessments from local community service organizations during and after the evaluation period. The community contact and needs assessments were all located within the bank's AA and represented organizations focused on affordable housing and providing community services for low-income individuals. The community contacts indicated a need for: supportive housing options for young adults and transitional youth with mental health disabilities; additional senior housing options; more resources for low-income families to make needed repairs on their homes; and funding to support affordable housing. Community contacts also indicated a need for providing financial literacy courses, especially for older adults not adept to online or mobile banking platforms and making those individuals aware of scams and other bad actors targeting them.

The following table provides a summary of the demographics that include housing, business, and farm information for the NY Non MSA AA and gives additional performance context for the bank's operations in the AA.

Assessment Area - NY Non MSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	0.00	15.00	70.00	12.50	2.50
Population by Geography	102,832	0.00	12.54	69.09	17.14	1.23
Housing Units by Geography	62,924	0.00	12.69	73.14	14.17	0.00
Owner-Occupied Housing by Geography	31,453	0.00	13.32	71.98	14.70	0.00
Occupied Rental Units by Geography	11,245	0.00	12.55	73.43	14.02	0.00
Vacant Units by Geography	20,226	0.00	11.79	74.79	13.42	0.00
Businesses by Geography	3,451	0.00	11.74	67.37	20.83	0.06
Farms by Geography	367	0.00	17.17	70.84	11.99	0.00
Family Distribution by Income Level	26,301	20.38	17.67	21.21	40.74	0.00
Household Distribution by Income Level	42,698	24.74	15.52	19.33	40.41	0.00
Unemployment rate (%)	5.12	0.00	4.33	4.94	6.65	0.00
Households Below Poverty Level (%)	13.89	0.00	17.21	14.03	10.18	0.00
Median Family Income (Non-MSAs - NY)		\$68,606			Median Housing Value	\$143,250
Median Family Income (Non-MSAs - NY) for 2024		\$83,800			Median Gross Rent	\$744
					Families Below Poverty Level	10.48
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in New York

The OCC conducted a full-scope review of the NY Non MSA AA. The evaluation period covered January 1, 2022, to December 31, 2024, and considered both home mortgage and consumer lending.

## **LENDING TEST**

The bank's performance under the Lending Test in New York is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the state of New York was Outstanding.

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

The bank exhibited excellent geographic distribution of loans in the state of New York.

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

Refer to Table 7 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent. The bank's level of home mortgage lending in moderate-income census tracts exceeded the percentage of owner-occupied housing units and aggregate lending in the AA. There were no low-income geographies in the AA.

#### ***Consumer Loans***

Refer to Table 9 in the state of New York section of appendix D for facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans was excellent. The bank's level of consumer loans in moderate-income census tracts approximated the percentage of moderate-income households in the AA. There were no low-income geographies in the AA.

#### ***Lending Gap Analysis***

The OCC reviewed supervisory data and other summary reports and did not identify any unexplained conspicuous lending gaps.

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

The bank exhibited an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

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

Refer to Table 8 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels was reasonable. The bank's lending to low-income borrowers was well below the number of low-income families in the AA but was near to the percentage of aggregate lending to low-income borrowers in the AA. The bank's

lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and aggregate lending to moderate-income borrowers in the AA.

***Consumer Loans***

Refer to Table 10 in the state of New York section of appendix D for facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels was excellent. The bank's lending to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income households in the AA.

**Responses to Complaints**

There were no CRA-related complaints during the evaluation period.

## Appendix A: Scope of Examination

---

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs 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>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not applicable	Not applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of New York</b>		
NY Non MSA AA	Full-scope	Delaware and Otsego counties

# Appendix B: Summary of State Ratings

---

RATINGS	
Overall Bank:	Lending Test Rating
The Delaware National Bank of Delhi	Outstanding
State:	
New York	Outstanding

## Appendix C: Definitions and Common Abbreviations

---

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/AA.

**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 CD loans and qualified investments, branch distribution, and CD services).

**Low-Income:** Individual income that is at 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 state/AA.

**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.

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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

**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

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/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.

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

- Table 7. 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 8. 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 MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table 10. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/AA

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
NY Non MSA AA	383	64,651	100.00	3,209	--	--	--	13.32	15.67	11.41	71.98	74.93	71.89	14.70	9.40	16.70	--	--	--
<b>Total</b>	<b>383</b>	<b>64,651</b>	<b>100.00</b>	<b>3,209</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>13.32</b>	<b>15.67</b>	<b>11.41</b>	<b>71.98</b>	<b>74.93</b>	<b>71.89</b>	<b>14.70</b>	<b>9.40</b>	<b>16.70</b>	<b>--</b>	<b>--</b>	<b>--</b>

*Source: FFIEC File - 2024, 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, -- HMDA Aggregate Data, "--" data not available.  
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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
NY Non MSA AA	383	64,651	100.00	3,209	20.38	5.48	6.29	17.67	22.19	19.01	21.21	19.58	20.97	40.74	49.61	42.94	--	3.13	10.78
<b>Total</b>	<b>383</b>	<b>64,651</b>	<b>100.00</b>	<b>3,209</b>	<b>20.38</b>	<b>5.48</b>	<b>6.29</b>	<b>17.67</b>	<b>22.19</b>	<b>19.01</b>	<b>21.21</b>	<b>19.58</b>	<b>20.97</b>	<b>40.74</b>	<b>49.61</b>	<b>42.94</b>	<b>--</b>	<b>3.13</b>	<b>10.78</b>

*Source: FFIEC File - 2024, 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, -- HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table 9: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-2024	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
NY Non MSA AA	80	898	100.00	--	--	12.69	12.50	73.14	81.25	14.17	6.25	--	--	
<b>Total</b>	<b>80</b>	<b>898</b>	<b>100.00</b>	<b>--</b>	<b>--</b>	<b>12.69</b>	<b>12.50</b>	<b>73.14</b>	<b>81.25</b>	<b>14.17</b>	<b>6.25</b>	<b>--</b>	<b>--</b>	

Source: FFIEC File – 2024, 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-2024	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
NY Non MSA AA	80	898	100.00	24.74	26.25	15.52	33.75	19.33	18.75	40.41	13.75	--	7.50	
<b>Total</b>	<b>80</b>	<b>898</b>	<b>100.00</b>	<b>24.74</b>	<b>26.25</b>	<b>15.52</b>	<b>33.75</b>	<b>19.33</b>	<b>18.75</b>	<b>40.41</b>	<b>13.75</b>	<b>--</b>	<b>7.50</b>	

Source: FFIEC File – 2024, 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%