



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

September 15, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Federal Savings Bank
Charter Number: #717528

89-16 Jamaica Avenue
Woodhaven, NY 11421

Office of the Comptroller of the Currency

7 Times Square, 10th Floor
New York, NY 10036

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: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on Community Federal Savings Bank's ("CFSB" or the "bank") performance in meeting the credit needs of the New York assessment area (AA).
- A substantial majority of the bank's loans were inside its AA.
- The bank has a reasonable loan-to-deposit (LTD) ratio.
- The bank has an excellent distribution of loans by income level of the geography.
- The Community Development (CD) Test rating is based on the institution's excellent level of CD loans and qualified investments.
- The bank demonstrates excellent responsiveness to community development needs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, the credit needs of the AA, and performance context, the bank's loan-to-deposit (LTD) ratio was reasonable. CFSB's quarterly average LTD ratio was calculated using quarterly data of the 12 quarters from the first quarter of 2022 through the fourth quarter of 2024. The bank's quarterly LTD ratio averaged 38.6 percent and ranged from a low of 33.9 percent and a high of 45.5 percent. CFSB's quarterly average LTD ratio underperformed financial institutions of similar asset size located in the AA. The quarterly average LTD ratio for these institutions was 85.5 percent, ranging from a low of 52.6 percent to a high of 107.4 percent

While the bank's LTD ratio is lower than similarly situated banks, it is reasonable considering the impact of deposits derived from the bank's Payment Solutions line of business. The bank's strategic focus on developing the Payments Solution business was the primary driver of deposit growth during the performance period, and according to internal bank information, Payments Solutions deposits represent a substantial majority of total deposits.

Lending in Assessment Area

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

The bank originated and purchased 91.7 percent of its total loans, by numerical volume, inside the bank's AA during the evaluation period. By dollar volume, 89.9 percent of loans were inside the AA. 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	88	91.67	8		8.33	96	192,027	89.90	
Total	88	91.67	8	8.33	96	192,027	89.90	21,575	10.10	213,602

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

Description of Institution

CFSB is a wholly owned thrift of Community FSB Holding Company, a mutual stock holding company. CFSB, headquartered in New York City, NY, operates one retail branch in Woodhaven, New York. There were no branch openings, closings, mergers, or acquisitions that affected the scope of the bank's operations during the evaluation period.

CFSB designated one AA consisting of six counties in the New York-Newark-New Jersey, NY-NJ-PA MSA (#35620). The AA consists of the five counties of New York City (Bronx, Kings, New York, Queens, and Richmond) in the New York-Jersey City-White Plains, NY-NJ Metropolitan Division (MD) (#35614), and Nassau County in the Nassau County-Suffolk County, NY MD (#35004). The Woodhaven branch is a full-service branch located in Queens County.

CFSB's total assets as of December 31, 2024 were \$892.8 million. CFSB reported net loans of \$304.7 million, representing 34.1 percent of total assets as of December 31, 2024. The bank's loan portfolio is comprised primarily of multifamily real estate loans, with \$229.8 million or 75.4 percent of loans in that category, plus non-farm non-residential real estate loans of \$37.5 million or 12.3 percent of loans, and 1-4 family residential of \$30.8 million or 10.1 percent of loans. The bank does not originate 1-4 family owner-occupied residential loans, and all loans reported under the Home Mortgage Disclosure Act (HMDA) requirements are multifamily, mixed-use, or investor-owned residential real estate. Tier 1 capital was \$84.2 million as of December 31, 2024.

The bank offers a traditional selection of deposit products such as savings accounts, transaction accounts, and certificates of deposits for both personal and business accounts. Lending products include commercial real estate mortgages and lines of credit. The bank also partners with marketplace lenders that issue secured and unsecured consumer and business loans. Other products the bank offers include online banking, bill pay, mobile banking, wire transfers, automated clearing house (ACH) payments, and payroll services. The bank's strategic focus has been on developing its banking-as-a-service line of business, Payment Solutions. The Payment Solutions line of business offers ACH and wire transfer settlement services, merchant acquiring, and issuing bank identification number (BIN) sponsorship.

There were no financial or legal impediments to the bank's ability to help meet the credit needs of the community it services. The OCC assigned CFSB an overall Outstanding rating for its last CRA evaluation dated March 7, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated CFSB's CRA performance using intermediate small bank CRA examination procedures, which include the Lending Test and the CD Test. The evaluation period for both tests was January 1, 2022 through December 31, 2024. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its primary lending product, home mortgage loans.

For lending performance, the loan distribution analysis compared originated and purchased home mortgage loans to demographic and aggregate data. Aggregate data illustrates how the bank is performing compared to other lenders in the AA and provides context on the reasonableness of the bank's performance. For the overall evaluation period, examiners placed more emphasis on demographic distributions than on aggregate performance.

While evaluating loans under the Lending Test, examiners placed more weighting to geographic distribution components of the Lending Test than borrower distribution components. The bank had a focused strategy of lending to commercial borrowers for multifamily properties and developing the Payments Solutions line of business due to the competitive lending environment in the AA. The bank reported loans to business entities secured by residential properties as required by HMDA, however, income levels of these business entities were not available, and therefore the borrower income distribution test is not meaningful.

The CD Test evaluates the bank's responsiveness to community development needs in the community through community development loans, qualified investments, and community development services.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more 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. 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

The bank's overall rating is based on performance in the sole New York MSA AA.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- CFSB has an excellent distribution of loans by income level of the geography.
- CFSB has a reasonable distribution of loans to individuals of different income levels, considering the bank's strategic focus on multifamily commercial lending, the lack of income information from borrowers for multifamily commercial loans, and additional performance context factors.
- CFSB exhibited excellent responsiveness to community development needs through community development loans and qualified investments.

Description of Institution's Operations in New York

CFSB designated one AA consisting of six counties in the New York-Newark-New Jersey, NY-NJ-PA MSA (#35620). The AA consists of the five counties of New York City (Bronx, Kings, New York, Queens, and Richmond) in the New York-Jersey City-White Plains, NY-NJ MD (#35614), and Nassau County in the Nassau County-Suffolk County, NY MD (#35004). The AA consists of 2,613 census tracts: 295 (11.3 percent) are low-income geographies, 601 (23.0 percent) are moderate-income geographies, 873 (33.4 percent) are middle-income geographies, 686 (26.3 percent) are upper-income geographies, and 158 (6.1 percent) are not classified. The AA meets the requirements of the CRA and does not arbitrarily exclude low- and moderate-income geographies.

CFSB operated in a highly competitive financial services market and competed with large, regional, and community banks for both deposits and lending opportunities. Based on the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Summary of Deposit Market Share Report, the bank ranked 56th out of 109 FDIC-insured depository institutions with a nominal 0.04 percent deposit market share. The top five banks by deposit market share have a combined market share of 74.6 percent and include JP Morgan Chase Bank, N.A. (42.1 percent), Goldman Sachs Bank USA (11.1 percent), The Bank of New York Mellon (10.6 percent), Bank of America, N.A. (5.6 percent), and Citibank, N.A. (5.2 percent).

Based on 2024 Peer Home Mortgage Data, 479 lenders originated loans in the New York AA. CFSB ranked 177th, with 0.3 percent market share. The top five home mortgage loan lenders in the AA have a combined market share of 28.9 percent and include JP Morgan Chase Bank, NA (6.9 percent market share), CBNA (6 percent market share), Citibank, NA (5.5 percent market share), Bethpage Federal Credit Union (5.3 percent market share), and TD Bank (5.2 percent market share).

The bank's strategic focus has been on developing the Payments Solution line of business, through which the bank conducts significant volume of international and domestic payment activity. Payment

Solutions offers ACH and wire transfer settlement services, merchant acquiring, card issuing, and bank identification number (BIN) sponsorship.

Employment and Economic Factors

Data from Moody's Analytics over the evaluation period indicated that the New York MSA AA experienced economic expansion driven by New York City's reputation as the financial capital of the world, high per capita income, and strong international immigration. This is mitigated by continued and increasing high housing costs and population losses that strain tax collections and limit the labor supply. The leading employment sectors in the New York-Jersey City-White Plains NY-NJ MD are the educational and health services, professional and business services, and government sectors, which account for 24.2 percent, 16.1 percent, and 12.4 percent of total employment in the MD, respectively. Of the top 13 employers in the MD, four are financial institutions, six are hospitals or health systems, two are universities, and one is a retail department store. The Nassau County-Suffolk County NY MD has a similar mix of leading employment sectors with educational and health services, professional and business services, and government sectors, which account for 21.7 percent, 13.7 percent, and 14.7 percent of total employment in the MD, respectively.

According to the Bureau of Labor Statistics (BLS), the non-seasonally adjusted unemployment rates for both the New York-Jersey City-White Plains NY-NJ MD and Nassau County have improved significantly since the peak impacts of the COVID pandemic. As of December 2024, the unemployment rate for the New York-Jersey City-White Plains NY-NJ MD was 4.7 percent, down from 6.9 percent in January 2022. Similarly, the unemployment rate for Nassau County in December 2024 was 3.0 percent, down from 3.5 percent in in January 2022. Approximately 15.8 percent of households in the bank's AA have incomes below the poverty level. This figure increases within low-income census tracts in the AA, in which 36.4 percent of households have incomes below the poverty level.

The following tables provide a summary of the demographics, including housing and business information for the New York MSA for the evaluation period.

Assessment Area - New York MSA 2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,613	11.29	23.00	33.41	26.25	6.05
Population by Geography	10,199,964	13.91	24.98	32.72	27.24	1.15
Housing Units by Geography	3,992,833	13.19	22.89	30.92	31.86	1.14
Owner-Occupied Housing by Geography	1,413,314	2.96	15.01	41.65	39.78	0.60
Occupied Rental Units by Geography	2,228,344	20.40	28.41	24.97	24.77	1.44
Vacant Units by Geography	351,175	8.62	19.53	25.44	45.01	1.41
Businesses by Geography	524,175	8.31	18.05	28.44	41.09	4.11
Farms by Geography	4,278	6.10	16.43	35.16	39.90	2.41
Family Distribution by Income Level	2,248,942	28.15	16.03	16.94	38.87	0.00
Household Distribution by Income Level	3,641,658	30.01	14.20	15.08	40.71	0.00
Unemployment rate (%)	6.29	11.25	7.19	5.66	4.37	7.85
Households Below Poverty Level (%)	15.81	36.41	20.54	11.04	7.68	23.11
Median Family Income (35004 - Nassau County-Suffolk County, NY MD)		\$130,301		Median Housing Value		\$575,800
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD)		\$85,483		Median Gross Rent		\$1,540
Median Family Income (35004 - Nassau County-Suffolk County, NY MD) for 2024		\$156,200		Families Below Poverty Level		12.38
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD) for 2024		\$101,900				
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						

Housing Affordability

Housing affordability is challenging for low- and moderate-income borrowers in the AA. Based on the 2024 median family information in the above table, low-income families earned less than \$50,950 or \$78,100, and moderate-income families earned \$81,520 or \$124,960 in the New York-Jersey City-White Plains NY-NJ MD and Nassau County-Suffolk County NY MD, respectively. The median housing value in the AA is \$575,800. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was between \$1,274 and \$1,953 for a low-income borrower and between \$2,038 and \$3,124 for a moderate-income borrower, depending on the MD. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$3,091. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing in this AA.

Community Contacts

To determine local economic conditions and community needs, the OCC performed community contact reviews from two community development organizations during the evaluation period. One organization is the nation's largest affordable housing trade association, dedicated to developing and preserving affordable housing across New York City. The organization advances its mission through strategic policy work, legislative engagement, and budget advocacy, ensuring that affordable housing remains a priority at every level of government. The second organization is a community development entity that supports affordable housing initiatives and offers homeownership programs for low- to moderate-

income individuals. Founded over 35 years ago, this nonprofit organization is committed to creating affordable housing opportunities in Nassau and Suffolk counties. The organization offers comprehensive housing counseling services and works to expand access to safe and affordable housing through technical assistance, community lending, education, and advocacy. The contacts stated that opportunities exist for financial institutions to participate in community development and identified the following community needs:

- There continues to be a need for more affordable housing, particularly through redevelopment initiatives.
- More flexible terms and underwriting criteria, particularly for applicants with non-traditional credit circumstances.
- Increase financial literacy initiatives to help residents better understand and manage personal finances.

Scope of Evaluation in New York

The bank's sole AA is the New York MSA AA, which was selected for a full-scope review. Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The distribution of the bank's home mortgage loans in low- and moderate-income geographies is excellent. The bank's proportion of home mortgage loans originated in both low- and moderate-income geographies exceed both the percentage of owner-occupied housing and the aggregate distribution.

Lending Gap Analysis

Examiners reviewed summary reports and maps detailing the bank's lending activity of the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained, conspicuous gaps identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 in the MMSA 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.

CFSB has a reasonable distribution of loans to individuals of different income levels, considering the bank's strategic focus on multifamily commercial lending, the lack of income information from borrowers for multifamily commercial loans, and additional performance context factors.

Responses to Complaints

The bank did not receive any complaints related to performance in meeting the AA's credit needs during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
New York	13	86.7	19,984	89.8
Broader Statewide or Regional Area	2	13.3	2,275	10.2
Total	15	100.0	22,259	100.00

During the evaluation period, CFSB originated 15 CD loans totaling \$22.3 million, or 26.4 percent of the bank's tier 1 capital. CFSB originated 13 qualified CD loans inside the AA totaling \$20.0 million and two qualified CD loans in the broader New York City metropolitan area totaling \$2.3 million. The CD loans address affordable housing needs of low- and moderate-income individuals in low- and moderate-income geographies within the bank's AA and the broader New York City metropolitan area.

The following are examples of the CD loans:

- The bank made a \$2.2 million loan to a business to finance three residential buildings with a combined 18 affordable housing units. These buildings were located within a low-income geography in the bank's AA.
- The bank made a \$1.4 million loan to a business to finance an apartment building with eight affordable housing units. This building was located within a moderate-income geography in the bank's AA.
- The bank made a \$1.5 million loan to a business to finance an apartment building with 16 affordable housing units. This building was located within a moderate-income geography in the bank's AA.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York	0	0	4	8,805	4	80.0	8,805	99.3	0	0.0
Broader Statewide or Regional Area	0	0	1	62	1	20.0	62	0.7	0	0.0
Total	0	0	5	8,867	5	100.0	8,867	100.0	0	0.0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. The table includes all CD investments, including prior period investments that remained outstanding as of the end of the evaluation period.

Total qualified investments and donations represent 10.6 percent of tier 1 capital. During the evaluation period, the bank made four investments totaling \$8.8 million to support affordable housing in the AA. The bank also made a \$62,000 donation to Scale Link, a certified Community Development Financial Institution (CDFI) that purchases small business loans directly from CDFIs when they need liquidity.

The following are examples of qualified investments in the AA:

- The bank made a \$2.8 million investment in a mortgage-backed security secured by a property in a moderate-income geography in the bank's AA that provides affordable housing.
- The bank made a \$2.1 million investment in a mortgage-backed security secured by a property in the bank's AA that provides affordable housing.
- The bank made a \$2.0 million investment in a mortgage-backed security secured by a property in a moderate-income geography in the bank's AA that provides affordable housing.

Extent to Which the Bank Provides Community Development Services

The bank did not report completion of any qualified CD services during the evaluation period.

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

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 MSA(s) and non-MSA(s) 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:	01/01/22 to 12/31/24	
Bank Products Reviewed:	Home mortgage loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
New York AA	Full-scope	Counties of Bronx, Kings, Nassau, New York, Queens, and Richmond

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Community Federal Savings Bank	Satisfactory	Outstanding	Satisfactory
MMSA or State:			
New York AA	Satisfactory	Outstanding	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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/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 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/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.

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 30th 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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
New York MSA 2024	88	192,027	100.00	246,036	2.96	14.77	3.86	15.01	42.05	14.98	41.65	27.27	38.86	39.78	15.91	41.49	0.60	--	0.73
Total	88	192,027	100.00	246,036	2.96	14.77	3.86	15.01	42.05	14.98	41.65	27.27	38.86	39.78	15.91	41.49	0.60	--	0.73

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 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
New York MSA 2024	88	192,027	100.00	246,036	28.15	--	3.27	16.03	--	9.60	16.94	--	18.59	38.87	--	47.54	--	100.00	21.01
Total	88	192,027	100.00	246,036	28.15	--	3.27	16.03	--	9.60	16.94	--	18.59	38.87	--	47.54	--	100.00	21.01

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