



## **PUBLIC DISCLOSURE**

May 28, 2019

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

Abacus Federal Savings Bank  
Charter Number 708059

6 Bowery  
New York, NY 10013-5101

Office of the Comptroller of the Currency

343 Thornall Street, Suite 610  
Edison, NJ 08837

**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 **Outstanding**.

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

The major factors that support this rating include:

- The bank's quarterly loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of the bank's lending is inside its assessment area (AA) by number and dollar amount of home mortgage loans originated or purchased.
- The distribution of loans across geographies of different income levels is excellent.
- The distribution of loans by income level of the borrower reflects excellent distribution of home mortgage loans to individuals of low- and moderate income levels.
- The bank did not receive any CRA-related complaints during the evaluation period.

The Lending Test rating is based on the New York-Newark-Bridgeport, NY-NJ-CT-PA Combined Statistical Area (CSA) rating and the state of Pennsylvania rating to arrive at an overall bank Lending Test rating. There was significant weight placed on the CSA to arrive at an overall conclusion. The bank has 93.4 percent of deposits in the CSA and 6.6 percent in the state of Pennsylvania. Lending was 96.3 percent in the CSA and 3.7 percent in the state of Pennsylvania over the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is more than reasonable. The LTD ratio is calculated on a bank-wide basis. The bank's quarterly LTD ratio since the prior CRA evaluation through March 31, 2018 averaged 94.30 percent, ranging from a low of 89.22 percent in the fourth quarter of 2015 and a high of 99.07 percent in the fourth quarter of 2017. The bank's LTD compares favorably to other banks of similar size operating within at least one of Abacus' designated AAs. The average LTD ratio for similar banks over the same period was 85.85 percent. The ratio ranged from an average quarterly low 71.22 of percent and a high of 106.58 percent.

### Lending in Assessment Area

Based on the data in Table D below, a substantial majority of the bank's loans are inside its assessment AAs by both number of loans and dollar amount of loans during the evaluation period. The bank originated and purchased 95.4 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level. The bank originated and purchased 92.8, 97.1, and 94.4 percent of its total loans inside the bank's AA during 2016, 2017, and 2018, respectively. These results factored favorably into the overall analysis of the geographic distribution of lending by income level of geography.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	77	92.8	6	7.2	83	37,213	90.8	3,790	9.2	41,003
2017	230	97.1	7	2.9	237	92,004	97.7	2,149	2.3	94,153
2018	186	94.4	11	5.6	197	81,287	96.1	3,320	3.9	84,607
<b>Subtotal</b>	<b>493</b>	<b>95.4</b>	<b>24</b>	<b>4.6</b>	<b>517</b>	<b>207,719</b>	<b>94.5</b>	<b>12,044</b>	<b>5.5</b>	<b>219,763</b>
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018            Due to rounding, totals may not equal 100.0</i>										

## Description of Institution

Abacus Federal Savings Bank (Abacus or bank) is a \$339.7 million minority depository institution headquartered in New York, NY. The bank primarily provides credit and bank facilities to the Asian-American community. A group of Chinese business leaders founded the bank in 1984. The principal organizer remains the primary shareholder and Chairman of the Board of Directors.

The minority owned institution operates six full-service bank branches in two assessment areas. The branches are located in major Asian-American communities – Manhattan’s Chinatown; the New York City Financial District; Flushing, Queens; Sunset Park, Brooklyn; Philadelphia, Pennsylvania; and Edison, New Jersey. The bank’s main branch and headquarters are located in Manhattan’s Chinatown. The Manhattan Chinatown; Sunset Park, Brooklyn; and Flushing, Queens branches are located in low-income geographies. The Edison, NJ and Philadelphia, PA branches are located in middle-income geographies. The New York City Financial District branch is located in an upper-income geography. All six branches have automated teller machine (ATM) services onsite. The bank did not close or open any new branches during this evaluation period.

As of December 31, 2018, Abacus reported total assets of \$339.7 million, with net loans and leases of \$283.9 million and total deposits of \$293.1 million. Real estate loans represent the primary asset class and totaled \$287.5 million. Tier 1 capital totaled \$39.7 million. The bank primarily offers traditional credit and bank facilities tailored to the Asian-American community that it serves. These products include home mortgages, passbook savings accounts, secured credit cards, and safe deposit boxes in three of the branches, among others.

Abacus operates in a competitive financial services market, with large institutions and other small institutions offering competing products in the bank’s assessment areas. The bank’s loan officers have a physical presence at the branches periodically to assist in increasing lending activity. The bank also participates in the State of New York Mortgage Agency and Federal Home Loan Bank of New York first time home buyer programs, respectively.

Abacus has no financial or legal impediments affecting the bank’s ability to meet the credit needs of their community. At the last CRA evaluation, dated February 16, 2016, Abacus was rated “Satisfactory.”

## **Scope of the Evaluation**

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

We completed a review of Abacus' CRA performance in its AA under the Small Bank examination procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. Abacus did not include any community development (CD) activities in this CRA Evaluation. The bank's lending performance for 2016 was evaluated separately and 2017-2018 were evaluated on a combined basis due to changes in census data effective in 2017.

### **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 assessment areas located within the same Combined Statistical Area (CSA) were evaluated as a single AA. These combined AAs were evaluated as full-scope. The state of Pennsylvania also received a full-scope review. Refer to the "Scope" section under the CSA and State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full-scope AAs.

### **Ratings**

The bank's overall rating is a blend of the CSA and state rating. There was significant weight placed on the CSA to arrive at an overall conclusion. The bank has 93.4 percent of deposits in the CSA and 6.6 percent in the state of Pennsylvania. Lending during the evaluation period was 96.3 percent in the CSA and 3.7 percent in the state of Pennsylvania. The CSA rating and state rating are based on performance in all bank AAs. Refer to the "Scope" section under the state and CSA 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) 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.

## Combined Statistical Area Rating

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

**CRA rating for the NY-NJ-CT-PA CSA<sup>1</sup>:** Outstanding.

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

The major factors that support this rating include:

- The bank's quarterly loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of the bank's lending is inside its assessment area (AA) by number and dollar amount of home mortgage loans originated or purchased.
- The distribution of loans across geographies of different income levels is excellent.
- The distribution of loans by income level of the borrower reflects excellent distribution of home mortgage loans to individuals of low- and moderate income levels.
- The bank did not receive any CRA-related complaints during the evaluation period.

## Description of Institution's Operations in NY-NJ-CT-PA CSA

Abacus operates five branches within the following four counties of the NY-NJ-CT-PA CSA: Kings, Queens and New York in New York state, and Middlesex in New Jersey. There were no branch openings or closings in the CSA since the previous evaluation. All branches are open Monday through Friday with four of the branches open Saturday and three branches have Sunday hours. All branches have onsite ATMs and two of the branches in the CSA offer safe deposit box services.

Abacus provides a range of traditional home mortgage loan and deposit products within the CSA. In 2016, Abacus originated 90.4 percent of the bank's total loan quantity and 88.9 percent of the bank's total loan dollar amount inside the CSA. In 2017, Abacus originated 93.2 percent of the bank's total loan quantity and 96.5 percent of the bank's total loan dollar amount inside the CSA. In 2018, Abacus originated 90.4 percent of the bank's total loan quantity and 95 percent of the bank's total loan dollar amount inside the CSA. As of June 30, 2018 Abacus had \$256.3 million of deposits within the CSA. This represented 93.4 percent of the bank's total deposits and .01 percent of the total CSA deposit market share at that time.

Banking in the CSA of NY-NJ-CT-PA is competitive, with 201 institutions offering deposit services in the CSA. Five large institutions with the highest share of deposits hold an aggregate of 56.8 percent of all deposits within the CSA. Multiple small institutions also offer products in direct competition with the bank.

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<sup>1</sup> This rating reflects performance within the MMSA. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

To gain a better understanding of the AA and performance context, a community contact within the bank's AA was interviewed. Based on the discussion, affordable housing continues to be a primary need in the community particularly for the elderly.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Abacus NY NJ PA CT</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	3,561	11.4	22.4	32.9	30.9	2.3
Population by Geography	14,946,656	13.2	23.2	31.5	31.9	0.3
Housing Units by Geography	5,845,181	12.2	22.0	30.9	34.7	0.2
Owner-Occupied Units by Geography	2,574,909	2.7	13.9	38.4	44.9	0.1
Occupied Rental Units by Geography	2,766,909	21.3	29.4	24.2	24.8	0.2
Vacant Units by Geography	503,363	10.6	23.1	29.2	36.8	0.2
Businesses by Geography	1,074,141	7.0	16.2	29.7	45.7	1.5
Farms by Geography	14,535	4.0	15.9	36.9	42.8	0.4
Family Distribution by Income Level	3,488,084	26.1	15.7	17.1	41.1	0.0
Household Distribution by Income Level	5,341,818	28.0	14.3	15.9	41.9	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$503,107
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$108,193	Median Gross Rent			\$1,365
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047	Families Below Poverty Level			11.9%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in the NY-NJ-CT-PA CSA

The bank identified the New York-Newark-Bridgeport, NY-NJ-CT-PA Combined Statistical Area 35620 as its assessment area (AA). The CSA includes the Bridgeport-Stamford-Norwalk, CT Metropolitan Statistical Area (MSA) 14860, Nassau County-Suffolk County, NY Metropolitan Division (MD) 35004, and the New York-Jersey City-White Plains, NY-NJ MD 35614. For the purpose of this evaluation, the AAs within the bank delineated CSA were combined and evaluated as a single AA. The AA meets regulatory requirements and does not arbitrarily exclude LMI geographies.

The evaluation period for the lending test was January 1, 2016 through December 31, 2018. Due to changes in census data effective in 2017, we evaluated the bank's 2017 and 2018 lending performance

separately from the bank's 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.

In arriving at the overall conclusions, significant weight was placed on lending activities within the CSA compared to the state of Pennsylvania. This was due to 93.4 percent of deposits in the CSA compared to 6.6 percent in the state of Pennsylvania.

## **LENDING TEST**

The bank's performance under the Lending Test in the NY-NJ-CT-PA CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the NY-NJ-CT-PA CSA is excellent.

The lending test was based on home mortgage loans for 2016 and 2017-2018.

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

The bank exhibits excellent geographic distribution of home mortgage loans for 2016 and 2017-2018 in the CSA. Refer to Table O in the CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loans.

For 2016, the distribution of the bank's home mortgage loans in low- and moderate-income geographies is excellent. The proportion of loans was significantly stronger than the aggregate distribution of loans in those geographies. The proportion of loans was comparable to the proportion of owner-occupied housing units in those geographies.

For 2017-2018, the distribution of the bank's home mortgage loans in low- and moderate-income geographies is excellent. The proportion of loans was significantly stronger than the aggregate distribution of loans in those geographies. The proportion of loans was comparable to the proportion of owner-occupied housing units in those geographies.

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

We reviewed summary reports and maps in analyzing Abacus' home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels for 2016 and 2017-2018 in the CSA, given the product lines offered by the bank. Refer to Table P in the CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans.

For 2016, the distribution of home mortgage loans to low- and moderate-income borrowers is reasonable. The proportion of loans was weaker than the aggregate distribution of loans to low-income

borrowers and comparable to the aggregate distribution of loans to moderate-income borrowers. The proportion of loans was significantly weaker than the proportion of low-income families and was generally comparable to the proportion of moderate-income families.

For 2017-2018, the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is excellent. The proportion of loans was stronger than the aggregate distribution of loans to low-income borrowers and moderate-income borrowers. The proportion of loans was significantly weaker than the proportion of low-income families, and generally comparable to the proportion of moderate-income families.

For 2016 and 2017-2018, the significantly weaker proportion of lending to low-income families is reasonable given the low median income of \$72,047 in the New York-Jersey City-White Plains, NY-NJ MSA, compared to median housing values of \$503,107 according to the 2015 ACS census data.

Due to the longer review period and higher loan volume, the 2017- 2018 distribution carried more weight in our final determination of an excellent distribution by income level of the borrower.

### **Responses to Complaints**

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

## State Rating

### State of Pennsylvania

**CRA rating for the State of Pennsylvania<sup>2</sup>:** Satisfactory.

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

The major factors that support this rating include:

- The bank's quarterly loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of the bank's lending is inside its assessment area (AA) by number and dollar amount of home mortgage loans originated or purchased.
- The bank did not receive any CRA-related complaints during the evaluation period.
- Due to the low level of lending, we did not have a sufficient sample to perform a meaningful analysis for the borrower and geographic distribution.

### Description of Institution's Operations in Pennsylvania

Abacus operates one branch in the Philadelphia Metropolitan Division (MD) - 37964, which is in Philadelphia County, Pennsylvania. There were no branch openings or closings since the previous evaluation. The branch offers both onsite ATM and safe deposit box services. The branch is open from 8:30am to 4:00pm Monday through Friday and 9:00am to 2:00pm on Saturday.

Abacus provides a range of traditional home mortgage loan and deposit products in the Philadelphia MD. The amount of lending and deposit activity in this MD is limited, however. Abacus has a loan officer at the Philadelphia branch on certain days in the month with the intention of expediting the loan application process and increasing lending activity. There has been a positive impact with this as in 2016, the bank originated 2.4 percent of its total loans in this assessment area, and in 2017 and 2018 there was an increase to 3.8 percent and 4.1 percent of the bank's total loan originations, respectively. As of June 30, 2018 Abacus had \$18.2 million of total deposits within the MD. This represented 6.6 percent of the bank's total deposits and about .01 percent of the total MD deposit market share.

Banking in the Philadelphia MD is competitive, with 117 institutions offering deposit services in the MD. Competition includes two large banks with an aggregate of 50 percent of the total market share. Numerous midsize and small institutions also compete with Abacus within the MD.

To gain a better understanding of the AA and performance context, a community contact within the bank's AA was interviewed. Based on the discussion, there is a need for community financial institution funding to promote economic growth and opportunity within the AA.

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<sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

## State of Pennsylvania

### Philadelphia MSA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Abacus Philadelphia</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	384	13.0	33.9	22.9	26.8	3.4
Population by Geography	1,555,072	13.8	36.2	25.5	23.9	0.6
Housing Units by Geography	670,229	13.1	35.7	24.5	26.3	0.4
Owner-Occupied Units by Geography	305,884	10.0	32.1	28.3	29.6	0.0
Occupied Rental Units by Geography	275,166	15.0	36.9	22.0	25.3	0.8
Vacant Units by Geography	89,179	17.5	44.8	19.1	18.4	0.3
Businesses by Geography	92,637	8.6	26.3	21.3	41.6	2.2
Farms by Geography	570	6.5	21.1	24.4	46.0	2.1
Family Distribution by Income Level	309,568	30.6	17.8	16.5	35.1	0.0
Household Distribution by Income Level	581,050	31.3	15.5	15.4	37.8	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$56,411	Median Housing Value			\$169,604
			Median Gross Rent			\$956
			Families Below Poverty Level			21.0%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Pennsylvania

We completed a full-scope review for Abacus' Philadelphia, PA AA. The AA consists of the Philadelphia, PA MD- 37964. The AA meets regulatory requirements and does not arbitrarily exclude LMI geographies.

The evaluation period for the lending test was January 1, 2016 through December 31, 2018. Due to changes in census data effective in 2017, we evaluated the bank's 2017 and 2018 lending performance separately from the bank's 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.

## LENDING TEST

The bank's performance under the Lending Test for the state of Pennsylvania is rated Satisfactory

Based on a full-scope review, the bank's lending performance in the state of Pennsylvania is reasonable.

The lending test was based on home mortgage loans for 2016 and 2017-2018.

While the level of lending is low in the state, it is reasonable given the low level of deposits in the state. There have been improvements to lending levels in comparing 2016 to 2017-2018, both at the state level and bank level. There were temporary strategic decisions that resulted in limited lending in 2016. By late 2016, the bank was able to recruit a qualified and experienced loan director with knowledge of the bank's markets. As a result, the bank was able to increase lending in their assessment areas and the positive results were evidenced in 2017-2018.

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

We did not have a sufficient sample of home mortgage loans to perform a meaningful analysis for geographic distribution.

For 2016, the bank originated only two home mortgage loans, and neither were in low- or moderate-income geographies. For 2017-2018, the bank originated 17 home mortgage loans, two in low-income geographies and five in moderate-income geographies.

Refer to Table O in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loans.

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

We reviewed summary reports and maps in analyzing Abacus' home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

We did not have a sufficient sample of home mortgage loans to perform a meaningful analysis for loans to individuals of different income levels.

For 2016, the bank originated two home mortgage loans, and neither were to low- or moderate-income borrowers. For 2017-2018, the bank originated 17 home mortgage loans, five to low-income borrowers and one to a moderate-income borrower.

Refer to Table P in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans.

### **Responses to Complaints**

The bank 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 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>	01/01/16 to 12/31/18	
<b>Bank Products Reviewed:</b>	Home mortgage	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<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>MMSA(s)</b>		
NY NJ PA & CT CSA- 35620	Full-scope	Counties of Kings, Manhattan, Queens, Richmond, Bronx, Nassau, Suffolk & Westchester in NY. Counties of Middlesex & Bergen in NJ and Fairfield County in CT.
<b>Pennsylvania</b>		
Philadelphia, PA MD – 37964	Full-scope	County of Philadelphia

## Appendix B: Summary of MMSA and State Ratings

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RATINGS <span style="background-color: #d9ead3;">Abacus</span>	
Overall Bank:	Lending Test Rating
Abacus	Outstanding
MMSA or State:	
NY-NJ-CT-PA CSA	Outstanding
Pennsylvania	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

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

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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/assessment area. 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. 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 V. 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/assessment area

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2016</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	
Abacus NY NJ PA CT	75	36,453	100.0	227,858	2.4	8.0	2.6	14.1	32.0	13.3	39.4	34.7	36.9	44.1	25.3	47.2	0.0	0.0	0.0	
<b>Total</b>	<b>75</b>	<b>36,453</b>	<b>100.0</b>	<b>227,858</b>	<b>2.4</b>	<b>8.0</b>	<b>2.6</b>	<b>14.1</b>	<b>32.0</b>	<b>13.3</b>	<b>39.4</b>	<b>34.7</b>	<b>36.9</b>	<b>44.1</b>	<b>25.3</b>	<b>47.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2017-18</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	
Abacus NY NJ PA CT	399	171,266	100.0	206,332	2.8	6.3	3.4	13.9	27.8	14.2	38.4	37.1	37.3	44.9	28.8	45.0	0.1	0.0	0.1	
<b>Total</b>	<b>399</b>	<b>171,266</b>	<b>100.0</b>	<b>206,332</b>	<b>2.8</b>	<b>6.3</b>	<b>3.4</b>	<b>13.9</b>	<b>27.8</b>	<b>14.2</b>	<b>38.4</b>	<b>37.1</b>	<b>37.3</b>	<b>44.9</b>	<b>28.8</b>	<b>45.0</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>	

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

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2016</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
Abacus PA	2	760	100.0	33,790	11.0	0.0	6.3	29.1	0.0	23.6	33.5	50.0	34.7	26.4	50.0	35.2	0.0	0.0	0.2
<b>Total</b>	<b>2</b>	<b>760</b>	<b>100.0</b>	<b>33,790</b>	<b>11.0</b>	<b>0.0</b>	<b>6.3</b>	<b>29.1</b>	<b>0.0</b>	<b>23.6</b>	<b>33.5</b>	<b>50.0</b>	<b>34.7</b>	<b>26.4</b>	<b>50.0</b>	<b>35.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.2</b>

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

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2017-18</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
Abacus PA	17	2,027	100.0	33,639	10.0	11.8	5.5	32.1	29.4	28.6	28.3	47.1	29.6	29.6	11.8	36.3	0.0	0.0	0.1
<b>Total</b>	<b>17</b>	<b>2,027</b>	<b>100.0</b>	<b>33,639</b>	<b>10.0</b>	<b>11.8</b>	<b>5.5</b>	<b>32.1</b>	<b>29.4</b>	<b>28.6</b>	<b>28.3</b>	<b>47.1</b>	<b>29.6</b>	<b>29.6</b>	<b>11.8</b>	<b>36.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2016</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
Abacus NY NJ PA CT	75	36,453	100.0	227,858	24.9	1.3	2.7	16.4	10.7	10.4	18.2	9.3	19.4	40.5	8.0	53.0	0.0	70.7	14.5
<b>Total</b>	<b>75</b>	<b>36,453</b>	<b>100.0</b>	<b>227,858</b>	<b>24.9</b>	<b>1.3</b>	<b>2.7</b>	<b>16.4</b>	<b>10.7</b>	<b>10.4</b>	<b>18.2</b>	<b>9.3</b>	<b>19.4</b>	<b>40.5</b>	<b>8.0</b>	<b>53.0</b>	<b>0.0</b>	<b>70.7</b>	<b>14.5</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-18</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
Abacus NY NJ PA CT	399	171,266	180.5	206,332	26.1	4.0	3.1	15.7	12.5	11.4	17.1	15.8	20.1	41.1	10.5	51.9	0.0	57.1	13.5
<b>Total</b>	<b>399</b>	<b>171,266</b>	<b>180.5</b>	<b>206,332</b>	<b>26.1</b>	<b>4.0</b>	<b>3.1</b>	<b>15.7</b>	<b>12.5</b>	<b>11.4</b>	<b>17.1</b>	<b>15.8</b>	<b>20.1</b>	<b>41.1</b>	<b>10.5</b>	<b>51.9</b>	<b>0.0</b>	<b>57.1</b>	<b>13.5</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2016</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
Abacus PA	2	760	100.0	33,790	30.2	0.0	5.6	17.6	0.0	12.9	17.6	0.0	17.5	34.6	0.0	43.1	0.0	100.0	20.8
<b>Total</b>	<b>2</b>	<b>760</b>	<b>100.0</b>	<b>33,790</b>	<b>30.2</b>	<b>0.0</b>	<b>5.6</b>	<b>17.6</b>	<b>0.0</b>	<b>12.9</b>	<b>17.6</b>	<b>0.0</b>	<b>17.5</b>	<b>34.6</b>	<b>0.0</b>	<b>43.1</b>	<b>0.0</b>	<b>100.0</b>	<b>20.8</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-18</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
Abacus PA	17	2,027	188.9	33,639	30.6	29.4	6.4	17.8	5.9	13.3	16.5	0.0	18.0	35.1	5.9	44.1	0.0	58.8	18.2
<b>Total</b>	<b>17</b>	<b>2,027</b>	<b>188.9</b>	<b>33,639</b>	<b>30.6</b>	<b>29.4</b>	<b>6.4</b>	<b>17.8</b>	<b>5.9</b>	<b>13.3</b>	<b>16.5</b>	<b>0.0</b>	<b>18.0</b>	<b>35.1</b>	<b>5.9</b>	<b>44.1</b>	<b>0.0</b>	<b>58.8</b>	<b>18.2</b>

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