



## **PUBLIC DISCLOSURE**

April 24, 2017

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

The First National Bank of Dryden  
**Charter Number 6487**

7 W. Main Street  
Dryden, NY 13053

Office of the Comptroller of the Currency

ADC-Syracuse Field Office  
5000 Brittonfield Parkway Suite 102B  
East Syracuse, NY 13057

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

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## **Overall CRA Rating: This institution is rated Satisfactory.**

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

- A substantial majority of loans were originated inside the bank's assessment areas (AAs);
- The distribution of home loans among borrowers of different income levels reflects reasonable penetration;
- The distribution of consumer loans to borrowers of different income levels reflects excellent penetration;
- The geographic distribution of loans in low- and moderate-income (LMI) census tracts within the Ithaca MSA AA reflects reasonable dispersion; and
- The bank did not receive any CRA related complaints during the evaluation period.

## **Definitions and Common Abbreviations**

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

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

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

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

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

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

loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

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

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

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

## Description of Institution

The First National Bank of Dryden (FNBD) is a \$141 million community bank with the main office located in Dryden, New York. Dryden is a small rural community approximately forty miles north of Binghamton, New York, forty-five miles south of Syracuse, New York, and within approximately ten miles of Cortland and Ithaca, New York. FNBD has three branches, two of which are located in Tompkins County within one mile of each other in the town of Dryden. The Cortland office opened in June 2004, and is located in the Town of Cortland in Cortland County, New York. All three locations have a drive-up facility and non-deposit taking automated teller machines (ATMs). FNBD offers a traditional selection of banking products and services, including online banking and bill pay. There were no branch openings or closings during the evaluation period.

As of December 31, 2016, the bank's assets were composed of \$44.8 million (32%) in loans and \$89.3 million (63%) in investments. Total deposits were \$125.3 million. 1-4 Family Residential loans totaled \$25.7 million or 57.4 percent of the loan portfolio. The remainder of the portfolio was made up of \$7.6 million (17%) of loans to individuals, and \$5.8 million (12.9%) commercial and industrial loans. The banks' business strategy is to primarily focus on making consumer installment loans and 1-4 family residential mortgages.

The FDIC deposit market share report as of June 30, 2016, ranked FNBD as seventh out of ten financial institutions in the Ithaca Metropolitan Statistical Area (MSA) with a 4.43 percent market share with two branches. Tompkins Trust Company is ranked first with a 61.11 percent market share and ten branches within the MSA. M&T Bank and Elmira Savings Bank ranked second and third with 9.51 percent, and 6.32 percent, respectively.

In Cortland County, FNBD ranked fifth out of eight institutions in market deposit share with 5.56 percent of deposits. NBT Bank, N.A. ranked first with 40.09 percent market share and five branches within Cortland County, followed by First Niagara Bank, N.A. with a 27.16 percent market share and four branches.

There are no legal, financial, or other factors that would impeded the bank's ability to help meet the credit needs in its AAs. At the last CRA examination, dated August 2, 2011, FNBD received a "Satisfactory" CRA rating.



## **Scope of the Evaluation**

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

FNBD's Community Reinvestment Act performance was evaluated under the small bank examination procedures, which includes a lending test. The lending test evaluated the bank's record of meeting the credit needs of its AAs through its lending activities. The evaluation period for the lending test covers Home Mortgage Loan Data (HMDA) from January 1, 2015 to December 31, 2016

The bank's primary loan products are consumer loans and home mortgage loans, which include home purchase, home improvement, and home refinance loans. Conclusions are based on bank's 2015-2016 HMDA-LAR data of loans originated between January 1, 2015 and December 31, 2016. As consumer loans are not reported, we used the OCC CRA Handbook methodologies to sample consumer loans from 2015 and 2016.

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

The bank has two assessment areas, Ithaca MSA AA #27060 and Cortland County Non-MSA AA, both of which received a full-scope review during this evaluation.

### **Description of Ithaca MSA AA (#27060)**

This assessment area is part of the Ithaca MSA and consists of all tracts in Tompkins County in New York State. There are two branches located within the AA. The AA contains 23 census tracts, with one low-income tract, four moderate-income tracts, eleven middle-income tracts, and six upper-income tracts which make up the AA.

According to the US Bureau of Labor Statistics (BLS) as of December 31, 2016, the unemployment rate for the Ithaca MSA was 3.8 percent. Moody's Analytics indicate that Ithaca's economy has been relatively stable and job growth has been mainly driven by the universities in the area and high tech manufacturing. Major employers include Cornell University, Ithaca College, BorgWarner Morse Systems, and Cayuga Medical Center.

Competition for loans is high within the AA. Peer Mortgage 2015 Market Share data indicates that FNBD competes with 128 lenders in the Ithaca MSA, and the top three lenders dominate with a 48.65 percent market share. CFCU Community Credit Union ranks first with a 21.09 percent market share; Tompkins Trust Company ranks second with a 15.23 percent market share, and Elmira Savings Bank ranked third with a 12.33 percent market share. FNBD ranks 14<sup>th</sup> with a market share of 1.3 percent.

The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts or extend beyond an MSA boundary.

**Ithaca MSA AA**

Demographic Information for Full Scope Area: Ithaca MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	23	4.35	17.39	47.83	26.09	4.35
Population by Geography	101,564	4.10	13.40	49.74	29.44	3.32
Owner-Occupied Housing by Geography	21,157	0.25	15.72	62.39	21.61	0.04
Business by Geography	5,313	0.23	25.16	46.88	27.35	0.38
Farms by Geography	274	0.00	18.25	69.71	12.04	0.00
Family Distribution by Income Level	19,798	19.40	18.94	20.42	41.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	7,590	3.00	22.66	60.12	14.22	0.00
Median Family Income	72,231	Median Housing Value		183,558		
FFIEC Adjusted Median Family Income for 2016	69,000	Unemployment Rate		3.80%		
Households Below Poverty Level	17%	(December 2016 BLS Data)				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: December 2016 Bureau of Labor Statistics and 2016 FFIEC updated MFI

**Description of Cortland County Non-MSA AA**

The Cortland County Non-MSA AA consists of all tracts in Cortland County in New York State. The AA is comprised of 12 tracts in Cortland County. There is one branch located in the assessment area. There are no low- or moderate-income tracts, nine middle-income tracts, and three upper-income tracts in this AA.

According to The Bureau of Labor Statistics as of December 31, 2016, the unemployment rate for the Cortland County AA was 6.0 percent. The economy in the assessment area has been growing, however growth in the area has been slower than the national average. The economy in the AA is primarily driven by government and health care industries. The State University of New York at Cortland is the largest employer in the AA with over 1,000 employees.

Competition for loans is high within this AA. Peer Mortgage 2015 Market Share data indicates that FNBD competes with 99 lenders within the Non-MSA AA. The top three lenders have a market share of 31.81 percent. NBT Bank, NA ranked first with an 11.14 percent market share, followed by CFCU Community Credit Union with a 10.46 percent market share, and Elmira Savings Bank ranked third with a 10.21 percent market share. FNBD ranks eighth with a market share of 3.5 percent.

The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts.

**Cortland County Non-MSA AA**

Demographic Information for Full Scope Area: Dryden Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	0.00	75.00	25.00	0.00
Population by Geography	49,336	0.00	0.00	73.10	26.90	0.00
Owner-Occupied Housing by Geography	11,862	0.00	0.00	67.74	32.26	0.00
Business by Geography	2,225	0.00	0.00	65.26	34.74	0.00
Farms by Geography	186	0.00	0.00	87.10	12.90	0.00
Family Distribution by Income Level	11,247	14.86	18.44	23.46	43.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,745	0.00	0.00	77.14	22.86	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		54,386 58,900 14%		Median Housing Value Unemployment Rate (December 2016 BLS Data)	97,520 6.0%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: December 2016 Bureau of Labor Statistics Data and 2016 FFIEC updated MFI

**Other**

During our examination, we contacted a local town official for the Village of Dryden. The contact indicated that there are opportunities for financial institutions to participate in lending for affordable housing in the local community. Additionally, the contact noted that high cost of real estate taxes may place a burden on the community in the future.

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

Pursuant to 12 C.F.R. 25.28(c) and 195.28(c), in determining a national bank's (bank) or federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA'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 (HUD), and the Consumer Financial Protection Bureau (CFPB).

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Tests

### LENDING TEST

FNBD's performance under the lending test is rated Satisfactory. During the lending test we placed more weight on lending to moderate-income borrowers considering area demographics and competition. A substantial majority of primary loan products were originated within the bank's AAs. The distribution of home loans among borrowers of different income levels reflects reasonable penetration. The distribution of consumer loans to borrowers of different income levels reflects excellent penetration. Geographic distribution of loans reflects reasonable dispersion within the Ithaca MSA AA.

### Loan-to-Deposit Ratio

FNBD's loan-to-deposit (LTD) ratio is less than reasonable given institution's size, financial condition, and credit needs of the assessment area. The bank's average LTD ratio for the prior twenty two quarters since the last evaluation is 35.56 percent, with a quarterly high of 42.16 in 2011Q4 and a quarterly low of 32.71 percent in 2016Q1. During the same period, a custom peer group of four banks operating in or near the AA with less \$475 million in total assets had an average LTD ratio of 72.61 percent.

### Lending in Assessment Area

The bank originated a substantial majority of its loans inside the assessment areas. During the evaluation period the bank generated 1,607 of its 1,756 or 91.51 percent of its loans inside the assessment areas.

Table 1- Lending in the Assessment Area										
Loan Type	Number of loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
HMDA	114	85.07	20	14.93	134	6,232,000	82.06	1,362,000	17.94	7,594,000
Consumer	1,493	92.05	129	7.95	1,622	12,571,694	89.07	1,542,157	10.93	14,113,851
Total	1,607	91.51	149	8.49	1,756	18,803,694	86.62	2,904,157	13.38	21,707,851

Source: Data Reported under HMDA, Loan origination data.

### Lending to Borrowers of Different Income Levels

FNBD's lending to borrowers of different income levels reflects excellent penetration. The distribution of home loans originated in the Bank's AAs reflects reasonable penetration among individuals of different income levels, and excellent penetration of consumer loans.

Borrower Distribution in the Ithaca MSA AA

Home Loans

FNBD’s lending to borrowers of different income levels within the Ithaca MSA AA for home loans reflects reasonable penetration. While the percentage of home purchase and refinance loans is lower than the percent of low-income families in the AA, the overall performance is considered reasonable given FNBD’s market share combined with the cost of housing and high competition. Of the 128 lenders in the AA, FNBD is ranked 14<sup>th</sup> with a market share of 1.33 percent.

According to the 2010 Census Data, the FFIEC updated median cost of housing in the Ithaca MSA is \$183,558 and according to The Housing and Urban Development (HUD) updated median family income a low-income family earns less than \$34,500 annually. When considering these factors, home loan opportunities to low-income families is extremely limited.

The percentage of loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the MSA. Considering the affordability of housing in the Ithaca MSA, this performance is excellent. A moderate-income family in the AA earns less than \$55,200. Based on these statistics it would be difficult for a moderate-income borrower to purchase housing in the AA.

The following table shows the distribution of home loan products among borrowers of different income levels compared to the percentage of families in each income category.

Table 2- Borrower Distribution of Residential Real Estate Loans in Ithaca MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
Home Purchase	19.40	13.33	18.94	40.00	20.42	26.67	41.25	20.00
Home Improvement	19.40	34.62	18.94	34.62	20.42	11.54	41.25	19.23
Home Mortgage Refinance	19.40	0.00	18.94	16.67	20.42	0.00	41.25	83.33

Source: Data Reported under HDMA; US Census Data

Consumer Loans

The distribution of Consumer loans exhibits excellent penetration, exceeding the percentage of low- and moderate-income households in the AA.

The following table shows the borrower distribution of Consumer Loans in the Ithaca MSA AA:

Table 2B- Borrower Distribution of Consumer Loans in Ithaca MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of # of Loans	% of AA Households	% of # of Loans	% of AA Households	% of # of Loans	% of AA Households	% of # of Loans
Consumer Loans	19.40	23.81	18.94	47.62	20.42	9.52	41.25	19.05

Source: Loan Sample; US Census Data

Borrower Distribution in the Cortland County AA

Home Loans

FNBD’s Home Loan lending to borrowers of different incomes in the Cortland County AA reflects reasonable penetration. While there were no home purchases or refinance loans for low-income families in the AA, this performance is considered reasonable given the percentage of loans originated to moderate-income families, considering the cost of housing and high competition in the AA. Of the 99 lenders in the AA, FNBD is ranked eighth with a market share of 3.54 percent.

Based on demographic factors, the median cost of housing in the Ithaca MSA is \$97,520, based on 2010 Census Data. The Housing and Urban Development (HUD) updated median family income for 2016 is \$58,900, and a low-income family will earn less than \$29,500. This lack of affordability limits opportunities for home-ownership by low-income families.

Table 2- Borrower Distribution of Residential Real Estate Loans in Non-MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
Loan Type								
Home Purchase	14.86	0.00	18.44	17.39	23.46	30.43	43.25	52.17
Home Improvement	14.86	26.92	18.44	15.38	23.46	26.92	43.25	30.77
Home Mortgage Refinance	14.86	0.00	18.44	11.11	23.46	22.22	43.25	66.67

Source: Data Reported under HDMA; US Census Data

Consumer Loans

The distribution of Consumer loans exhibits excellent penetration, significantly exceeding the percentage of low- and moderate-income households in the AA.

The following table shows the borrower distribution of Consumer Loans in the Cortland County AA:

Table 2B- Borrower Distribution of Consumer Loans in Non-MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of # of Loans	% of AA Households	% of # of Loans	% of AA Households	% of # of Loans	% of AA Households	% of # of Loans
Consumer Loans	14.86	21.05	18.44	26.32	23.46	31.58	43.25	21.05

Source: Loan Sample; US Census Data

### Geographic Distribution of Loans

#### Ithaca MSA AA

Geographic distribution of loans reflects reasonable dispersion within the Ithaca MSA AA. Given the low number of owner occupied housing units within low- to moderate-income tracts and the distance of these tracts from FNBD's only branch, geographic distribution was determined to be adequate. Based on 2010 Census Data, there is one low-income census tract, and four moderate-income tracts within the Ithaca MSA AA.

The single low-income tract is located in the central portion of Tompkins County, with a total population of 4,162. Within the low-income tract there are 407 total housing units, of which only 52 are owner occupied units. Therefore, lending opportunities in this geography are very limited.

All four of the moderate-income tracts are located in Tompkins County. Two tracts are located in the Southwest portion of the county, while the other two are located in the Central portion. The total population of the four tracts is 13,611; there are 6,479 total housing units within the four tracts, of those 3,325 are owner-occupied. In addition, lending competition in these sections of the AA is significant, with FNBD ranked 27<sup>th</sup> out of 40 different mortgage lenders. As a result, lending opportunities in these geographies are also limited.

Table 3- Geographic Distribution of Home Mortgage Loans in Ithaca MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of Owner Occ Units	% of # of Loans	% of Owner Occ Units	% of # of Loans	% of Owner Occ Units	% of # of Loans	% of Owner Occ Units	% of # of Loans
Loan Type								
Home Purchase	0.25	0.00	15.72	6.67	62.41	86.67	21.62	6.67
Home Improvement	0.25	0.00	15.72	7.69	62.41	92.31	21.62	0.00
Home Mortgage Refinance	0.25	0.00	15.72	0.00	62.41	100.00	21.62	0.00



Source: Data Reported under HDMA; US Census Data

<b>Table 3- Geographic Distribution of Consumer Loans in Ithaca MSA AA</b>								
<b>Census Tract Income Level</b>	<b>Low</b>		<b>Moderate</b>		<b>Middle</b>		<b>Upper</b>	
<b>Loan Type</b>	<b>% of AA Households</b>	<b>% of # of Loans</b>	<b>% of AA Households</b>	<b>% of # of Loans</b>	<b>% of AA Households</b>	<b>% of # of Loans</b>	<b>% of AA Households</b>	<b>% of # of Loans</b>
Consumer Loans	1.06	0.00	15.64	0.00	53.95	100.00	29.26	0.00

Source: Loan Sample; US Census Data

**Non-MSA AA**

There were no low- or moderate-income geographies within the Non-MSA AA. Therefore, an analysis of the geographic distribution of loans would not be meaningful and was not completed.

**Responses to Complaints**

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