

Carthage Savings and Loan,  
National Association  
**Community Reinvestment Act (CRA)**  
**Public File**

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March 1, 2023

To Whom It May Concern:

There are currently no public comments on file with Carthage Savings and Loan, National Association regarding the Community Reinvestment Act.

A handwritten signature in cursive script that reads 'Heather T. Gallagher'.

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Heather T. Gallagher  
Assistant Vice President  
C.R.A. Officer



Office of the  
Comptroller of the Currency  
Washington, DC 20219

**SMALL BANK**

## **PUBLIC DISCLOSURE**

April 10, 2023

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

Carthage Savings and Loan, National Association  
Charter Number: 25272

313 State Street  
Carthage, NY 13619

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132  
East Syracuse, NY 13057

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

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## Overall CRA Rating

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

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

The major factors that support this rating include:

- The Lending Test rating is based on performance in the assessment area (AA) in the state of New York, which demonstrated an excellent distribution of loans to borrowers of different income levels and a poor distribution of loans to geographies of different income levels.
- Carthage Savings and Loan, National Association's (CSLNA or bank) average loan-to-deposit (LTD) ratio is reasonable based on the bank's size, financial condition, and credit needs of the AAs.
- A substantial majority of home mortgage loans originated and purchased during the evaluation period are inside the bank's AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. CSLNA's average LTD ratio for the 16-quarter period following the date of the prior evaluation period, December 31, 2017, through the end of the current evaluation period, December 31, 2021, is 85.1 percent. The bank's ratio ranged from a low of 78.2 percent to a high of 93.7 percent. In comparison, the quarterly average LTD ratio of four similarly situated financial institutions in the surrounding areas was 100.8 percent during the same period, ranging from a low of 71.8 percent to a high of 120.6 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 90.8 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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	625	90.8	63	9.2	688	73,009	91.2	7,087	8.8	80,096
Total	625	90.8	63	9.2	688	73,009	91.2	7,087	8.8	80,096

## Description of Institution

CSLNA is a \$284 million, single-state, community bank headquartered in Carthage, N.Y. CSLNA is a wholly-owned subsidiary of Riverbank Financial Corporation MHC, a Delaware chartered one bank holding company. CSLNA converted from a federal savings association to a national bank effective June 17, 2022, a strategic decision made to diversify funding sources through municipal deposits. CSLNA has one operating subsidiary, Public Square, Inc., that holds assets acquired through foreclosure. This performance evaluation did not include or consider any activities performed or conducted by bank affiliates.

The bank operates three full-service branches located in two designated AAs, the Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The bank expanded its AA designations to include the NY Non MSA AA with the establishment of a new full-service branch in Croghan, N.Y. on May 23, 2019. The bank closed their full-service branch in Clayton, N.Y. on June 14, 2021 and reopened the location as a loan production office due to a lack of significant deposit activity. All branches have cash dispensing automated teller machines (ATMs).

The bank's business strategy during the evaluation period focused on organic loan and deposit growth throughout its AAs. CSLNA reported total loans of \$196.1 million, representing 69 percent of total assets, as of December 31, 2021. The bank's primary lending focus continues to be centered in one-to-four family residential real estate products, representing \$187.2 million or 95.5 percent of total loans. Consumer and commercial real estate lending are nominal at \$6.8 million or 3.5 percent of total loans and \$2.1 million or 1.1 percent of total loans, respectively. The bank's deposits totaled \$243.6 million and tier 1 equity capital totaled \$33.1 million as of December 31, 2021.

There were no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AAs during the evaluation period. CSLNA received a "Satisfactory" rating for its prior Community Reinvestment Act (CRA) performance evaluation (PE) dated January 7, 2019.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This PE assessed the bank's lending performance in its AAs under the CRA. The bank was evaluated using the Small Bank evaluation procedures, which included the Lending Test. The Lending Test evaluated the bank's record of meeting the credit needs of its AA through its lending activities. The bank's performance was assessed using home mortgage loan originations and purchases during the evaluation period, which was January 1, 2019 through December 31, 2021. The evaluation period did not include 2022 lending activity because aggregate peer lending data was not available at the time of the evaluation; therefore, analysis of this activity would not be meaningful.

Management provided home mortgage information for 2019, 2020, and 2021 as required by the Home Mortgage Disclosure Act (HMDA). HMDA aggregate lending as well as market share

percentages consider only lenders that submit HMDA data. Lenders that collect but do not submit data are not considered in the percentages.

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

In each state where the bank has an office, one or more of its AAs within that state were 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) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank’s overall rating is based on its performance in the state of New York. The State Rating is based on the full-scope reviews of the bank’s Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The Watertown-Fort Drum NY MSA AA received the most weight in the performance assessment as it represented 71.4 percent of total home mortgage originations and purchases during the evaluation period and 94.2 percent of the bank’s total deposits.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State 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), 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 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 major factors that support this rating include:

- The bank had an excellent distribution of home mortgage loans to borrowers of different income levels within the AAs.
- The bank had a poor distribution of home mortgage loans among census tracts of different income designations within the AA.
- Management did not receive any complaints regarding CRA performance during the evaluation period.

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

CSLNA's primary lending focus in the state of New York is one-to-four family residential real estate. The bank offers traditional and non-complex residential real estate products including home mortgages, home equity lines of credit and home equity loans. The bank also offers non-conventional mortgages through the United States Department of Agriculture (USDA), Veterans Affairs (VA) and Federal Housing Administration (FHA) to assist applicants who might not otherwise qualify for a conventional mortgage.

As of December 31, 2021, CSLNA had two designated AAs in the state of New York, the Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The Watertown-Fort Drum NY MSA AA includes the entire Watertown-Fort Drum N.Y. MSA, which includes the entire political subdivision of Jefferson County. The NY Non MSA AA includes the entire political subdivision of Lewis County. No adjustments or revisions to the bank's designated AAs were necessary. All New York State AAs met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income areas.

The following tables and supporting information summarize the demographic information for the Watertown-Fort Drum NY MSA AA and the NY Non MSA AA.

## Watertown-Fort Drum NY MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Watertown-Fort Drum NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	19.2	65.4	7.7	7.7
Population by Geography	118,947	0.0	18.3	74.5	7.1	0.1
Housing Units by Geography	58,536	0.0	15.8	78.5	5.7	0.0
Owner-Occupied Units by Geography	24,610	0.0	7.9	83.2	8.9	0.0
Occupied Rental Units by Geography	19,696	0.0	32.1	63.5	4.4	0.0
Vacant Units by Geography	14,230	0.0	6.8	91.2	2.1	0.0
Businesses by Geography	6,596	0.0	17.6	75.6	6.8	0.0
Farms by Geography	381	0.0	5.2	81.9	12.9	0.0
Family Distribution by Income Level	30,116	19.8	18.3	22.4	39.5	0.0
Household Distribution by Income Level	44,306	22.6	16.2	20.8	40.5	0.0
Median Family Income MSA - 48060 Watertown-Fort Drum, NY MSA		\$57,300	Median Housing Value			\$139,278
			Median Gross Rent			\$979
			Families Below Poverty Level			10.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Watertown-Fort Drum NY MSA AA consists of the 26 contiguous census tracts included in Jefferson County, which is the entirety of the Watertown-Fort Drum N.Y. MSA. Per the 2015 American Community Survey (ACS) data, there were no low-income census tracts, five moderate-income census tracts, 17 middle-income census tracts, two upper-income census tracts, and two census tracts without an income designation. One census tract without an income designation included a portion of Lake Ontario and the other is Fort Drum, a U.S. Army military reservation. In addition, one moderate-income census tract is located in Fort Drum where less than 1 percent of housing units are owner-occupied.

CSLNA offered its products and services through its two branch locations, two ATMs, and one loan production office located in the AA, as well as its online banking and mobile banking applications. The bank closed its full-service branch in Clayton, N.Y on June 14, 2021 and reopened the location as a loan production office due to a lack of significant deposit activity. The Watertown branch was in a moderate-income census tract while the Carthage branch and Clayton loan production office were in middle-income census tracts.

As of June 30, 2021, CSLNA reported \$237.1 million in deposits in the Watertown-Fort Drum NY MSA AA, which represented 94.2 percent of total deposits. CSLNA ranked fifth out of 13 depository institutions in the AA, with a deposit market share of 8.9 percent. The bank's top

competitors for deposit market share include Watertown Savings Bank with 30.8 percent, Community Bank, N.A. with 22.8 percent, and Northern Credit Union with 14.5 percent.

Based on the 2021 HMDA market share data, CSLNA ranked eighth out of 128 lending institutions, or the 93<sup>rd</sup> percentile, with a 4 percent market share. The top five home mortgage lenders in the market, Northern Credit Union, Watertown Savings Bank, Community Bank, N.A., AmeriCU Credit Union, and Rocket Mortgage had a combined market share of 42.6 percent. Market share for the top five competitors ranged from 7 percent to 10.6 percent.

According to the U.S. Bureau of Labor Statistics (BLS) December 2021 data, the unemployment rate (not seasonally adjusted) in the Watertown-Fort Drum N.Y. MSA was 3.7 percent, which outperformed the state unemployment rate of 4.8 percent. During the evaluation period, unemployment spiked to 18.7 percent in April 2020 due to the COVID-19 pandemic but quickly dissipated back to historic levels. Per Moody's Analytics, the MSA economy is flatlining as the labor market has struggled to gain momentum. The largest sector of the economy is government, primarily driven by Fort Drum, the largest employer in the area. The economy is expected to benefit from the National Defense Authorization Act, which gives a nearly 3 percent pay raise to military personnel and continues to list Fort Drum as a preferred site for missile defense installation.

The OCC utilized information from one community contact within the bank's AA to determine local economic conditions and community needs. The contact is a local community development organization that focuses on low- and moderate-income housing advocacy, counseling, referral, and related activities, as well as safe and affordable rental housing. The contact reported the need for affordable housing, homeless services, small dollar unsecured lending, and revitalization in the downtown area of Watertown, N.Y. The contact specifically noted CSLNA as one of the local financial institutions that support the needs of the community.

**NY Non MSA AA**

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	85.7	0.0	0.0
Population by Geography	27,124	0.0	7.3	92.7	0.0	0.0
Housing Units by Geography	15,249	0.0	9.7	90.3	0.0	0.0
Owner-Occupied Units by Geography	8,066	0.0	7.5	92.5	0.0	0.0
Occupied Rental Units by Geography	2,473	0.0	8.0	92.0	0.0	0.0
Vacant Units by Geography	4,710	0.0	14.5	85.5	0.0	0.0
Businesses by Geography	1,465	0.0	4.6	95.4	0.0	0.0
Farms by Geography	220	0.0	0.5	99.5	0.0	0.0
Family Distribution by Income Level	7,380	18.8	19.2	22.9	39.1	0.0
Household Distribution by Income Level	10,539	20.7	17.1	18.4	43.8	0.0
Median Family Income Non-MSAs - NY		\$59,570	Median Housing Value			\$115,921
			Median Gross Rent			\$701
			Families Below Poverty Level			8.9%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The NY Non MSA AA consists of the eight contiguous census tracts of Lewis County. Per the 2015 ACS data, there were no low-income census tracts, one moderate-income census tract, seven middle-income census tracts, and no upper-income census tracts.

CSLNA offered its products and services through its one branch location and one ATM located in the AA, as well as its online banking and mobile banking applications. The bank added the NY Non MSA AA designation with the opening of its first full-service branch in Croghan, N.Y. on May 23, 2019. The Croghan branch is in a middle-income census tract.

As of June 30, 2021, CSLNA reported \$14.7 million in deposits in the NY Non MSA AA, which represented 5.8 percent of total deposits. CSLNA ranked third out of three depository institutions in the AA, with a deposit market share of 4 percent. The top competitors for deposit market share in the AA are Community Bank, N.A. and KeyBank, N.A. with deposit market shares of 71.5 percent and 24.5 percent, respectively.

Based on the 2021 HMDA market share data, CSLNA ranked third out of 69 lending institutions, or the 95<sup>th</sup> percentile, with an 8.4 percent market share. The top two home mortgage lenders in the market were Community Bank, N.A. and Northern Credit Union with market shares of 21.2 percent and 17.1 percent, respectively.

According to the U.S. BLS December 2021 data, the unemployment rate (not seasonally adjusted) in Lewis County was 3.9 percent, which outperformed the state unemployment rate of 4.8 percent. During the evaluation period, unemployment spiked to 15.5 percent in April 2020 due to the COVID-19 pandemic but quickly dissipated back to historic levels. Major employers in the area include Kraft Heinz, Lewis County General Hospital, Lewis County, and various school districts.

The OCC utilized information from one community contact within the bank's AA to determine local economic conditions and community needs. The contact was a Community Development Financial Institution focused on serving small businesses in the Adirondack and Northern region of New York, including Lewis County. The contact noted a need for financing for start-ups and existing businesses owned by historically disadvantaged groups.

## **Scope of Evaluation in New York**

The OCC conducted full-scope reviews of the bank's Watertown-Fort Drum NY MSA AA and the NY Non MSA AA. The Watertown-Fort Drum NY MSA AA received the most weight in the state assessment as it represented 71.4 percent of total home mortgage originations and purchases during the evaluation period. The distribution of loans by income level of the borrower received more weight under the Lending Test given the lack of low-income census tracts and limited number of moderate-income census tracts in the bank's AAs.

## **LENDING TEST**

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

## **Conclusions for Areas Receiving Full-Scope Reviews.**

Based on full-scope reviews, the bank's performance in the Watertown-Fort Drum NY MSA AA and the NY Non MSA AA is good.

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

The bank exhibits poor geographic distribution of loans in the state of New York.

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

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

### **Watertown-Fort Drum NY MSA AA**

The geographic distribution of home mortgage loans is very poor. The geographic distribution of home mortgage loans in moderate-income census tracts was significantly below the percentage

of owner-occupied housing and aggregate lending in the AA. The AA did not include any low-income census tracts.

#### *NY Non MSA AA*

The geographic distribution of home mortgage loans is reasonable. The geographic distribution of home mortgage loans in moderate-income census tracts was well below the percentage of owner-occupied housing and aggregate lending in the AA. The AA did not include any low-income census tracts.

The assessment of performance considered the limited number of moderate-income census tracts in the AA, the timing of the bank's entrance into the AA, and the distance between the one branch located in the AA and the one moderate-income census tract in the AA. The bank entered the AA on May 23, 2019 with the establishment of a branch in Croghan N.Y. In conjunction with the newly established branch, the bank designated the NY Non MSA AA, which includes one moderate-income census tract located approximately 20 miles away from the branch. CSLNA did not penetrate the moderate-income census tract in 2019; however, 2020 and 2021 lending activity displayed improved penetration when compared to the percentage of owner-occupied housing and aggregate lending in the AA, ranking fourth amongst lenders who made loans in the sole moderate-income census tract.

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

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

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

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

#### *Watertown-Fort Drum NY MSA AA*

The borrower distribution of home mortgage loans is excellent. Home mortgage lending to low-income borrowers is well below the number of low-income families and significantly exceeds aggregate lending. Home mortgage lending to moderate-income borrowers is below the number of moderate-income families and exceeds aggregate lending.

The assessment of performance considered housing affordability for low-income borrowers during the evaluation period given the median listing price and median family income. The median housing value was \$139,278 in the AA based on the 2015 ACS; however, per the Federal Reserve Economic Data maintained by the Federal Reserve Bank of St. Louis, the median home listing price in the Watertown-Fort Drum NY MSA AA ranged from \$159,900 to \$199,000 during the evaluation period. Based on the median listing price during the evaluation period, the monthly principal and interest payment of a 30-year mortgage with no down payment and a fixed 5 percent interest rate ranges from \$858 to \$1,068. Using a threshold of 30 percent of income for housing affordability and the 2021 updated median family of \$64,900 in the AA, a low-income

individual could afford a maximum monthly payment of \$811 without including additional expenses or real estate taxes. When including these additional expenses, it becomes even more difficult for low-income individuals to afford a mortgage in the AA.

#### NY Non MSA AA

The borrower distribution of home mortgage loans is reasonable. Home mortgage lending to low-income borrowers is well below the number of low-income families and is near to aggregate lending. Home mortgage lending to moderate-income borrowers exceeds the number of moderate-income families and is near to aggregate lending.

The assessment of performance considered housing affordability for low-income borrowers during the evaluation period given the median listing price and median family income. The median housing value was \$115,921 in the AA based on the 2015 ACS; however, per Realtor.com, the median home listing price in the NY Non MSA AA peaked at \$177,000 in September 2021. Based on the peak median listing price during the evaluation period, the monthly principal and interest payment of a 30-year mortgage with no down payment and a fixed 5 percent interest rate is \$950. Using a threshold of 30 percent of income for housing affordability and the 2021 updated median family of \$69,400 in the AA, a low-income individual could afford a maximum monthly payment of \$868 without including additional expenses or real estate taxes. When including these additional expenses, it becomes even more difficult for low-income individuals to afford a mortgage in the AA.

#### **Responses to Complaints**

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

#### **COVID-19 Pandemic Activities**

CSLNA participated as a lender in the Small Business Administration's Paycheck Protection Program (PPP). The PPP was implemented to encourage businesses to keep employees on payrolls during the initial lockdowns of the COVID-19 pandemic. Loans originated under the program carried an interest rate of 1 percent and had a maturity of two years if originated prior to June 5, 2020, and five years if originated after that date. The SBA forgave the loans if a business met certain requirements such as spending at least 60 percent of proceeds on payroll costs and maintaining employee and compensation levels. There were two rounds of the PPP, with the second round having stricter eligibility to target small businesses most affected by the COVID-19 pandemic's economic impact. During the evaluation period, CSLNA originated 40 PPP loans totaling \$8 million in the state of New York.



## 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>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<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>New York</b>		
Watertown-Fort Drum NY MSA AA	Full-Scope	Jefferson County
NY Non MSA AA	Full-Scope	Lewis County

## Appendix B: Summary of State Ratings

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RATINGS	
Overall Bank:	Lending Test Rating
Carthage Savings and Loan, National Association	Satisfactory
State:	
New York	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.

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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
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	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
NY Non MSA AA	179	20,172	28.6	785	0.0	0.0	0.0	7.5	4.5	6.8	92.5	95.5	93.2	0.0	0.0	0.0	0.0	0.0	0.0
Watertown-Fort Drum NY MSA AA	446	52,837	71.4	3,885	0.0	0.0	0.0	7.9	3.6	9.5	83.2	84.8	82.2	8.9	11.4	8.2	0.0	0.2	0.1
Total	625	73,009	100.0	4,670	0.0	0.0	0.0	7.8	3.8	9.0	85.5	87.8	84.1	6.7	8.2	6.9	0.0	0.2	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2019-21	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
NY Non MSA AA	179	20,172	28.6	785	18.8	5.0	5.9	19.2	21.2	22.9	22.9	27.9	25.5	39.1	44.1	37.2	0.0	1.7	8.5
Watertown-Fort Drum NY MSA AA	446	52,837	71.4	3,885	19.8	6.3	4.1	18.3	14.8	14.1	22.4	25.6	23.9	39.5	52.5	43.0	0.0	0.9	14.9
Total	625	73,009	100.0	4,670	19.6	5.9	4.4	18.5	16.6	15.6	22.5	26.2	24.2	39.4	50.1	42.0	0.0	1.1	13.8
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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.





March 1, 2023

To Whom It May Concern:

Effective June 15, 2021 our Clayton Branch returned to a loan production office. Carthage Savings and Loan, National Association did not open or close any branches for the calendar year 2022.

A handwritten signature in dark ink, reading 'Heather T. Gallagher'. The signature is written in a cursive style and is positioned above a horizontal dashed line.

Heather T. Gallagher  
Assistant Vice President  
C.R.A. Officer



**Carthage Savings and Loan, National Association  
Office Locations**

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**MAIN OFFICE**

Carthage Savings and Loan, National Association  
313 State Street  
Carthage, NY 13619

**WATERTOWN BRANCH OFFICE**

Carthage Savings and Loan, National Association  
146 Arsenal Street  
Suite 11  
Watertown, NY 13601

**CLAYTON LOAN PRODUCTION OFFICE**

Carthage Savings and Loan, National Association  
325 State Street  
Clayton, NY 13624

**CROGHAN BRANCH OFFICE**

Carthage Savings and Loan, National Association  
9756 Main St  
Croghan, NY 13327

**Main Office**

Carthage Savings and Loan, National Association  
313 State Street  
Carthage NY 13619  
**Census Tract/Block Number Area (0609.02)**

Lobby:	9:00 - 4:00	Mon-Wed
	9:00 - 5:00	Thurs-Fri

Drive Thru:	8:30 - 5:00	Mon-Wed
	6:30 - 5:00	Thurs-Fri
	9:00 - 12:00	Sat

**Services**

ATM, Notary of Public, Visa Credit Cards, Telephone Banking, Internet Banking, Safe Deposit Boxes, Savings Bonds, Money Orders, Cashier Checks, Direct Deposit, Automatic Payment Withdrawals

**Deposit Accounts**

Certificates of Deposits, Non-profit, Various Totally Free Checking Accounts, Business Checking, X-Mas Clubs, Passbook or Statement Savings Accounts, Retirement Accounts (IRA's), Money Market Accounts, Debit and ATM Cards

**Lending Programs**

VA, Seasonal, Biweekly, Rural Development Loans, Conventional Loans (Adjustable or Fixed Rate), Multi-family Mortgages, Construction, Mobile Home, Share Loans, Home Equity Lines of Credit. No closing cost programs. Home Improvement, Personal loans, Auto and Commercial loans.

**Schedule of Fees**

See attached listing- "Schedule of Service Charges"

**Clayton LPO**  
**Location**

Carthage Savings and Loan, National Association  
325 State Street  
Clayton, NY 13624  
**Census Tract/Block Number Area (0602.02)**

Office Hours: 9:00-4:00 Mon and Fri

Private appointments available on request during evenings and Saturdays.

**Services**

Loan Production Office

**Lending Programs**

VA, Seasonal, Biweekly, Rural Development Loans, Conventional Loans (Adjustable or Fixed Rate), Multi-family Mortgages, Construction, Mobile Home, Share Loans, Home Equity lines of Credit. No closing cost programs. Home Improvement, Personal loans, Auto and Commercial loans.

**Schedule of Fees**

See attached listing – “Schedule of Service Charges”

**Croghan Branch  
Location**

Carthage Savings and Loan, National Association  
9756 Main St, Croghan NY 13327  
**Census Tract/Block Number Area (9501.01)**

Office Hours: Mon-Wed 9:00 a.m.-3:00 p.m.  
Thursday 9:00 a.m.-5:00 p.m.  
Friday 9:00 a.m.-6:00 p.m.

**Services**

Cash dispensing, redeeming savings bonds, opening new accounts, money orders, cashier checks, loan origination to include mortgages, personal loans, home improvement loans, and share loans.

**Deposit Accounts**

Certificates of deposits, non-profit, various totally free checking account, business checking, Christmas clubs, passbook or statement savings accounts, IRA's, Money Market accounts

**Lending Programs**

VA, Seasonal, Biweekly, Rural Development Loans, Conventional Loans (Adjustable or Fixed Rate), Multi-family Mortgages, Construction, Mobile Home, Share Loans, Home Equity lines of Credit. No closing cost programs. Home Improvement, Personal loans, Auto and Commercial loans.

**Schedule of Fees**

See attached listing- "Schedule of Service Charges"

**Watertown  
Branch Office**

Carthage Savings and Loan, National Association  
146 Arsenal Street, Suite 11  
Watertown NY 13601  
**Census Tract/Block Number Area (0621.00)**

Lobby: 9:00 - 5:00 Mon-Fri  
9:00 - 12:00 Sat  
Drive Thru: 8:30 - 5:00 Mon-Fri  
9:00 - 12:00 Sat

**Services**

24 Hour ATM, Notary of Public, Visa Credit Cards,  
Telephone Banking, Internet Banking, Savings Bonds,  
Money Orders, Cashier Checks, Direct Deposit, Automatic  
Payment Withdrawals

**Deposit Accounts**

Certificates of Deposits, Non-profit, Various Totally Free  
Checking Accounts, Business Checking, X-Mas Clubs,  
Passbook or Statement Savings Accounts, Retirement  
Accounts (IRA's), Money Market Accounts, Debit and  
ATM Cards

**Lending Programs**

VA, Seasonal, Biweekly, Rural Development Loans,  
Conventional Loans (Adjustable or Fixed Rate), Multi-  
family Mortgages, Construction, Mobile Home, Share  
Loans, Home Equity Lines of Credit. No closing cost  
programs. Home Improvement, Personal loans, Auto and  
Commercial loans.

**Schedule of Fees**

See attached listing- "Schedule of Service Charges"



## ***SCHEDULE OF SERVICE CHARGES***

Effective June 2022

313 State Street  
Carthage, New York 13619  
Tel: 315-493-3480  
Fax: 315-493-0231

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146 Arsenal Street  
Suite 11  
Watertown, New York 13601  
Tel: 315-779-9775  
Fax: 315-779-1442

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325 State Street  
Clayton, New York 13624  
Tel: 315-686-4850  
Fax: 315-686-4855

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9756 Main St  
Croghan, NY 13327  
Tel: 315-346-2000  
Fax: 315-346-2001

[www.carthagesavings.com](http://www.carthagesavings.com)



<b>Certified Checks</b>	<b>\$10.00</b>
<b>Treasurer's Checks</b>	<b>\$5.00</b>
<b>Money Orders</b>	<b>\$3.00</b>
<b>Legal Levies</b>	<b>\$85.00</b>
<b>Research</b>	<b>\$20.00/Hour</b> <i>(\$10.00 Minimum)</i>
<b>Photo Copies</b>	<b>\$.25</b>
<b>Instant Statements</b>	<b>\$5.00</b>
<b>Per check copy</b>	<b>\$3.00</b>
<b>Protest Fee</b>	<b>\$20.00</b>
<b>Deposited Item Return</b>	<b>\$12.50</b>
<b>Non-Sufficient Fund Fee (NSF) *</b> <b>Item Paid</b>	<b>\$30.00</b>
<b>Non-Sufficient Fund Fee (NSF) *</b> <b>Item Returned</b>	<b>\$30.00</b>
One transaction may result in multiple NSF fees if re-presented	
<b>Sustained Overdraft: Per day after 5th business day</b>	<b>\$5.00</b>
<b>No Activity Fee (If no activity for 6 months &amp; balance is under \$100)</b>	<b>\$4.00</b>
<b>Check Reject Fee</b>	<b>\$5.00</b>
<b>Automatic Transfer for NSF Checks</b> <i>(From Statement Savings or NOW accounts Per Item Paid)</i>	<b>\$10.00/Item</b>
<b>ATM/Debit Card– No monthly charge, no charge within Carthage Savings and Loan's ATM Network. \$1.00 per transaction or balance inquiry outside of network.</b>	
<b>Lost, Stolen ATM/Debit Card Fee</b>	<b>\$5.00</b>
<b>Stop Payments: Checks, Bank Checks &amp; ACH Items</b>	<b>\$30.00</b>
<b>Early Closure Fee-within 6 months, unless otherwise stated</b>	<b>\$15.00</b>
<b>Incoming Wire Fee</b>	<b>\$20.00</b>
<b>Outgoing Wire Fee</b>	<b>\$20.00</b>
<b>IRA-Trustee to Trustee Transfer</b>	<b>\$25.00</b>
<b>Faxing: Incoming or Outgoing</b>	<b>\$3.00/Sheet</b>
<b>Coin Redemption Over \$150 transaction</b>	<b>\$.05/Roll</b> <i>on total amount</i>
<b>Safe Deposit Boxes-Lost Key</b>	<b>\$10.00</b>
<b>Drilled Box for Lost Keys</b>	<b>Customer Cost</b>
<b>Mail Fee for returned mail, if no change of address given</b>	<b>\$5.00</b>

\*Created by check, in-person withdrawal, ATM withdrawal, or other electronic means.  
Revised 6/2022






**Loan to Deposit Ratio (%)**

March	2020	84.65
June	2020	81.31
September	2020	79.60
December	2020	82.74
March	2021	82.20
June	2021	78.16
September	2021	79.81
December	2021	80.42
March	2022	79.90
June	2022	82.46
September	2022	83.53
December	2022	81.15

Prior 3 years loan to deposit ratios

Loan to Deposit Ratio compiled from Call Report, Schedule RC, line 4.d. / line 13.a.

 <p><b><i>Carthage Savings And Loan, National Association</i></b></p>	<p>Compliance Manual</p>	<p>Effective Date:  <b>12/30/02</b></p>
<p>Law or Regulations: <b>Reg BB, CRA Policy</b></p>	<p>Section: <b>6A</b></p>	

**A. Assessment Area:**

Carthage Savings & Loan, National Association has defined it's "assessment area" as the entire geographic area of Jefferson (045) and Lewis (049) counties located in New York State. The area is serviced by three (3) full service offices located in Carthage (main office), Watertown (branch), Croghan (branch) as well as one (1) loan production office in Clayton (branch).

Jefferson and Lewis Counties are located in the Northern part of New York State and are bordered by St. Lawrence County to the North, Canada and the St. Lawrence River to the Northeast, Herkimer to the West, and Oneida County and Oswego County to the South.

The association's assessment area includes all types of neighbors, districts, and persons of all income levels (including Low and Moderate). Designating the Bank's assessment area does not mean that the Bank does not make loans outside of that area. The assessment area merely sets forth the general operating area of the Bank. The concept of our assessment area is subject to change over time, as patterns of commercial development change and the populations shift.

The CRA officer shall maintain the Bank's public file and notices in conformity with the Regulation BB. The CRA officer shall also conduct an educational program for all Bank employees regarding the Bank's policy and the requirements of the regulation.

**B. Statement:**

It is the policy of Carthage Savings & Loan, National Association to give a solid commitment to fulfilling the needs of its communities. The Board of Directors, Senior Management, Officers and Employees all possess a sense of responsibility to the Bank's commitment to the Community Reinvestment Act. This commitment is incorporated into the daily operations of the Association.


## Section 6A: Reg BB, CRA Policy

### Census Tract / Block Number Area Jefferson and Lewis Counties

Last updated: 02/27/23

<b>Jefferson County</b>	<b>CT/BNA</b>
Town of Alexandria, Town of Theresa, Town of Orleans, Wellesley Island, La Fargeville, Redwood, Plessis	0601.01
Town of Alexandria, Redwood, Village of Alexandria Bay	0601.02
Town of Clayton, Town of Orleans, Thousand Islands Park, Wellesley Island, Fishers Landing	0602.01
Town of Clayton, Town of Cape Vincent, Village of Clayton	0602.02
Town of Alexandria, Town of Orleans, Town of Clayton, Village of Clayton, La Fargeville, Depauville	0602.03
Town of Cape Vincent, Town of Clayton, Village of Cape Vincent	0603.01
Town of Clayton, Town of Lyme, Three Mile Bay, Chamount, Depauville	0603.02
Town of Clayton, Town of Brownville, Depauville, Dexter	0604.01
Town of Hounsfield, Town of Adams, Sackets Harbor	0604.02
Town of Theresa, Town of Orleans, Town of Brownville, Town of Pamela, Town of LeRay, La Fargeville, Depauville, Pamela Center, Calcium	0605.00
Town of LeRay, Town of Philadelphia, Village of Philadelphia, Evans Mills	0606.01
Town of Pamela, Town of LeRay, Pamela Center, Calcium, Evans Mills	0606.02
Town of Alexandria, Town of Theresa, Town of Antwerp, Village of Antwerp, Oxbow, Village of Theresa, Redwood	0607.00
Town of LeRay, Fort Drum	0608.03
Town of LeRay, Fort Drum, Black River	0608.05
Town of Rutland, Town of Wilna, Town of LeRay, Fort Drum, Town of Champion, Fort Drum, Black River, Great Bend	0608.06
Town of Wilna, Natural Bridge, Village of Carthage	0609.01
Town of Wilna, Village of Deferiet, Village of Herrings, Village of Carthage	0609.02
Town of Champion, Great Bend, Village of West Carthage	0610.00
Town of Rutland, Town of Champion, Black River, Felts Mills, Great Bend	0611.01
Town of Watertown, Town of Rutland, Town of Pamela, Black River	0611.02
City of Watertown	0612.00
City of Watertown	0613.00
City of Watertown	0614.00
Town of Hounsfield, City of Watertown,	0615.00
Town of Brownville, Town of Adams, Town of Watertown, Town of Pamela, Village of Brownville, Village of Glen Park	0616.00
Town of Henderson, Town of Ellisburg, Town of Adams, Village of Henderson, Belleville	0617.00
Town of Ellisburg, Town of Lorraine, Town of Adams, Town of Watertown, Village of Adams Center, Village of Adams	0618.01
Town of Rodman, Town of Watertown, Village of Adams Center, Village of Adams	0618.02
City of Watertown	0619.00
City of Watertown	0621.00
City of Watertown	0622.00
Town of Lorraine, Town of Worth, Town of Rodman, Town of Watertown, Town of Champion, Village of Lorraine, Village of Rodman	0624.00
Town of Ellisburg, Town of Lorraine, Town of Worth, Belleville, Ellisburg, Pierrepoint Manor, Mannsville, Village of Lorraine	0625.00
Town of Antwerp, Town of Wilna, Town of LeRay, Town of Philadelphia, Village of Antwerp	9800.00
Town of Henderson	9900.01

<b>Lewis County</b>	<b>CT/BNA</b>
Town of Diana, Town of Croghan, Town of New Bremen, Village of Croghan,	9501.01
Town of Diana, Town of Croghan, Town of New Bremen, Village of Croghan	9502.00
Town of Lowville, Village of Lowville	9503.01
Town of Harrisburg, Town of Pinckney, Village of Lowville, Town of Lowville, Town of Denmark, Village of Copenhagen, Village of Castorland	9503.02
Town of Greig, Town of New Bremen	9504.01
Town of Martinsburg, Village of Lowville, Town of Lowville, Town of Pinckney, Town of Harrisburg	9505.00
Town of Lyons Falls, Town of Greig	9506.01
Town of West Turin, Village Constableville, Town of Osceola, Town of Montague, Town of Lyons Falls, Town of Greig, Village of Turin	9507.00
Town of Diana, Town of Croghan, Town of Watson, Town of Greig	9508.00

 <p><b><i>Carthage Savings And Loan, National Association</i></b></p>	<p>Compliance Manual</p>	<p>Effective Date:</p> <p><b>09/22/03</b></p>
<p>Law or Regulations: <b>CRA, Branch Closing Policy</b></p>	<p>Section: <b>6B</b></p>	

Carthage Savings & Loan, National Association currently maintains' a branch system. The Association is aware that it is increasingly difficult to make a full service branch competitive and profitable. Accordingly, the Association periodically re-evaluates the viability of our branches' and may in some cases have to close a branch.

The following would be considered if we were to close a branch,

Before closing a branch:

- A. We will develop hard data regarding profitability of the branch.
- B. We will try to identify changes in staffing, products offered, use of floor space, etc. that could make an unprofitable branch profitable.
- C. We will try to identify ways to increase the volume of or mix of business at the branch to increase its profitability.
- D. If we consider closing a branch in a lower income or minority area, we will meet with neighborhood representatives (elected or volunteer organizations) including the low and moderate-income to discuss measures that could help keep the branch open and/or make its closing as painless as possible to area customers.

If we must close a branch:

- A. If we close a branch, we will give customers at least **12** weeks' notice through both mail communication and signs in the branch.
- B. The Association will provide at least **90** days advance notice to the appropriate supervisory agency of any proposed branch closures, stating the reasons and statistical or other information supporting the decision to close.
- C. We will make it as easy as possible for customers of a closed branch to continue to bank with us.

## **Section 6B: CRA, Branch Closing Policy**

- D. We would consider providing a map to the next closest branch; offering a gift for visiting it; transferring personnel from the closed branch to the new one or using outplacement services; train staff to encourage customers to switch branches; offering customers counseling and/or kits on how to use direct deposit services, ATM's, and bank-by-mail or phone; and consider expanding ATM services in the affected area.
- E. We would evaluate the potential impact on the community of any closing of a branch, particularly the effect of any reduction in services provided to low-and-moderate income segments of the community.
- F. We would evaluate the closest branch hours to determine whether expanded hours are necessary.
- G. We would evaluate the appropriateness of service provided at any other branches and of any mechanism that may be used to encourage customer service and participation at the closest branch.

### **FILES ON PROPOSED AND ACTUAL BRANCH CLOSINGS**

For each proposed branch closing, the Association will create a file that documents adherence to each step of the branch closing policy statement. For instance, the file should contain:

- A. Profitability studies
- B. Analyses of how to improve profitability
- C. Reports on efforts to improve profitability and their results
- D. Notes of internal meetings and sessions with community groups

### **IF THE BRANCH IF ULTIMATELY CLOSED, DOCUMENT:**

- A. Correspondence with and special help given to customers affected by closings.
- B. Numbers of affected customers retained after six months.



## Carthage Savings & Loan, National Association

### BOARD OF DIRECTOR'S RESOLUTION ON ASSOCIATION POLICIES AND PROCEDURES

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At the Board of Directors meeting held on **February 24, 2003** the following resolution was approved by the Board.

***RESOLVED***, that the Board of Directors of Carthage Savings & Loan, National Association is desirous that the Association be managed in accordance to the Policies and Procedures approved by the Board.

***FURTHER***, the Board directs the Officers of the Association to place the following, **CRA Policy Sections A & B** into effect immediately.

The **purpose** of this policy is to verify and ensure that the bank operates in compliance with both the letter and the spirit of all laws, rulings, and regulations the bank is subject to as established by federal and state regulatory agencies.

#### Updates reviewed and approved by the Board of Directors:

February 24, 2003	September 23, 2013	November 28, 2022 *
September 27, 2004	September 22, 2014	February 27, 2023
September 26, 2005	September 28, 2015	
September 25, 2006	September 26, 2016	
September 24, 2007	September 25, 2017	
September 22, 2008	September 24, 2018	
September 21, 2009	September 23, 2019	
September 27, 2010	October 26, 2020	
September 26, 2011	October 25, 2021	
September 24, 2012	October 24, 2022	

*\*Please note, the CRA Policy Sections were reviewed by the Board with the other Compliance Manual Sections for the years of 2003-2022. The CRA sections were broken out as of the 2023 review.*



● Matched Address: 313 State St, Carthage, New York, 13619  
MSA: 48060 - WATERTOWN-FORT DRUM, NY || State: 36 - NEW YORK || County: 045 - JEFFERSON COUNTY || Tract Code: 0609.02

● Selected Tract  
MSA: || State: || County: || Tract Code:



## 2023 FFIEC Geocode Census Report

Matched Address: 313 State St, Carthage, New York, 13619

MSA: 48060 - WATERTOWN-FORT DRUM, NY

State: 36 - NEW YORK

County: 045 - JEFFERSON COUNTY

Tract Code: 0609.02

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

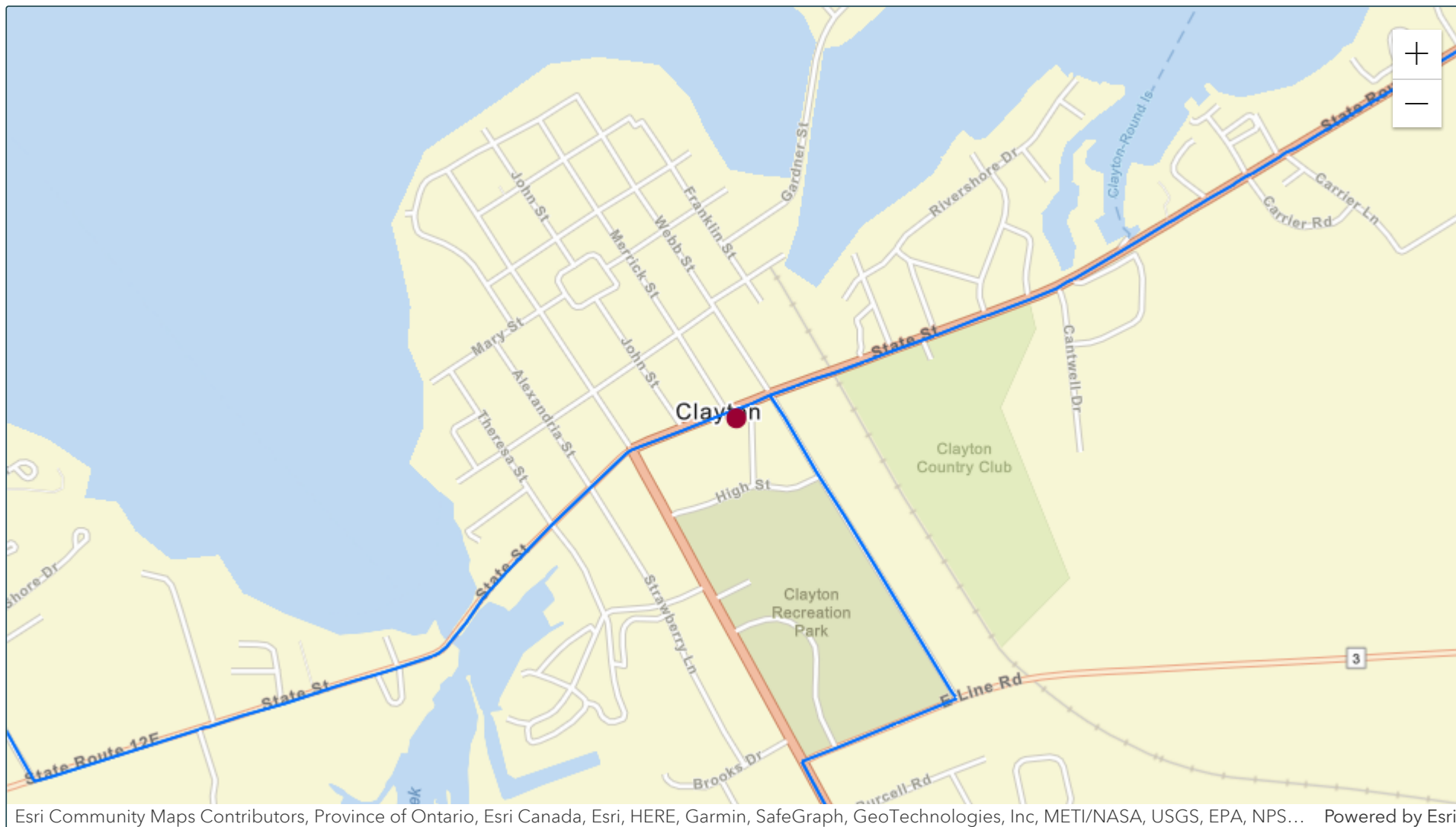
### Census Income Information

Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2015 Tract Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	





● Matched Address: 325 State St, Clayton, New York, 13624

MSA: 48060 - WATERTOWN-FORT DRUM, NY || State: 36 - NEW YORK || County: 045 - JEFFERSON COUNTY || Tract Code: 0602.02

● Selected Tract

MSA: || State: || County: || Tract Code:



## 2023 FFIEC Geocode Census Report

Matched Address: 325 State St, Clayton, New York, 13624

MSA: 48060 - WATERTOWN-FORT DRUM, NY

State: 36 - NEW YORK

County: 045 - JEFFERSON COUNTY

Tract Code: 0602.02

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Income Information

Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2015 Tract Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	



● Matched Address: 9756 Main St, Croghan, New York, 13327  
MSA: NA - NA (Outside of MSA) || State: 36 - NEW YORK || County: 049 - LEWIS COUNTY || Tract Code: 9501.01

● Selected Tract  
MSA: || State: || County: || Tract Code:



## 2023 FFIEC Geocode Census Report

Matched Address: 9756 Main St, Croghan, New York, 13327

MSA: NA - NA (Outside of MSA)

State: 36 - NEW YORK

County: 049 - LEWIS COUNTY

Tract Code: 9501.01

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Population Information

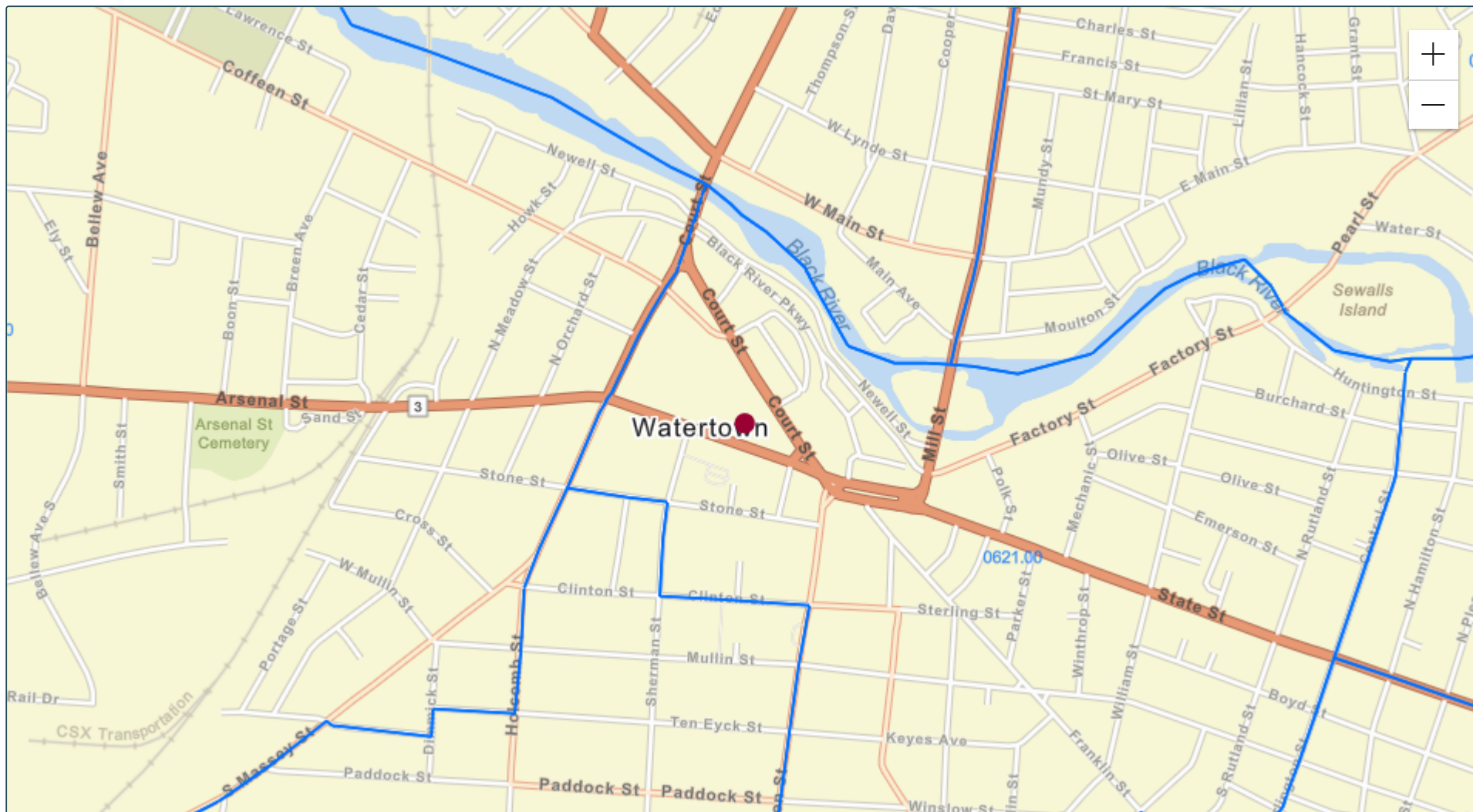
Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Income Information

Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2015 Tract Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	



Esri Community Maps Contributors, Province of Ontario, Esri Canada, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS... Powered by Esri

**Matched Address:** 146 Arsenal St, Watertown, New York, 13601  
**MSA:** 48060 - WATERTOWN-FORT DRUM, NY || **State:** 36 - NEW YORK || **County:** 045 - JEFFERSON COUNTY || **Tract Code:** 0621.00

**Selected Tract**  
**MSA:** || **State:** || **County:** || **Tract Code:**



## 2023 FFIEC Geocode Census Report

Matched Address: 146 Arsenal St, Watertown, New York, 13601

MSA: 48060 - WATERTOWN-FORT DRUM, NY

State: 36 - NEW YORK

County: 045 - JEFFERSON COUNTY

Tract Code: 0621.00

### Summary Census Demographic Information

Tract Income Level	
Underserved or Distressed Tract	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Family Income	
Tract Median Family Income %	
Tract Population	
Tract Minority %	
Tract Minority Population	
Owner-Occupied Units	
1- to 4- Family Units	

### Census Income Information

Tract Income Level	
2020 MSA/MD/statewide non-MSA/MD Median Family Income	
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	
% below Poverty Line	
Tract Median Family Income %	
2015 Tract Median Family Income	
2023 Estimated Tract Median Family Income	
2020 Tract Median Household Income	

### Census Population Information

Tract Population	
Tract Minority %	
Number of Families	
Number of Households	
Non-Hispanic White Population	
Tract Minority Population	
American Indian Population	
Asian/Hawaiian/Pacific Islander Population	
Black Population	
Hispanic Population	
Other/Two or More Races Population	

### Census Housing Information

Total Housing Units	
1- to 4- Family Units	
Median House Age (Years)	
Owner-Occupied Units	
Renter Occupied Units	
Owner Occupied 1- to 4- Family Units	
Inside Principal City?	
Vacant Units	

## **COMMUNITY REINVESTMENT ACT NOTICE**

Under the Federal Community Reinvestment Act (CRA), the Office of Comptroller evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Office of Comptroller also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the OCC; and comments received from the public relating to assessment area needs and opportunities, as well as our responses to those comments. You may review this information today by reviewing the public section of our most recent CRA evaluation, prepared by the OCC, which is available at <https://www.carthagesavings.com/about-us/cra-public-file.html>.

You may also have access to the following additional information, which we will make available to you after you make a request to us: (1) A map showing the assessment area of a select branch, which is the area in which the Comptroller evaluates our CRA performance in this community; (2) branch addresses and associated branch facilities and hours in any assessment area; (3) a list of services we provide at those locations; (4) our most recent rating in the assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the Office of Comptroller publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Deputy Comptroller, Northeastern District, 340 Madison Avenue, 5th Floor, New York, New York 10173-0002. You may send written comments about our performance in helping to meet community credit needs to Heather T. Gallagher, CRA Officer, Carthage Savings and Loan, National Association, 313 State Street, Carthage, New York 13619 and Deputy Comptroller, Northeastern District, 340 Madison Avenue, 5th Floor, New York, New York 10173-0002. The OCC Deputy Comptroller's contact email address is [CRACOMMENTS@OCC.TREAS.GOV](mailto:CRACOMMENTS@OCC.TREAS.GOV). Your letter, together with any response by us, will be considered by the Office of Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Comptroller. You may also request from the Comptroller an announcement of our applications covered by the CRA filed with the Office of Comptroller.

## HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers, and information about loan approvals and denials. HMDA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protections Bureau's website ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).