



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Mahopac National Bank
Charter Number: 13121

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Mahopac, NY 10541

Office of the Comptroller of the Currency

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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 following table indicates the performance level of **The Mahopac National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Mahopac National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank's performance under the lending test is adequate;
- A substantial majority of the bank's loans were originated within the assessment area;
- The bank's level of community development lending in the AA is good. Community development lending addressed community credit needs and had a positive effect on the lending test;
- The bank's performance under the service test is good;
- The bank's performance under the investment test is good; and
- The bank's service delivery systems are accessible to individuals and geographies of different income levels.

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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on 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 geography.

Description of Institution

The Mahopac National Bank (MNB) is headquartered in Mahopac, New York in Putnam County, with executive offices in Brewster, New York in Putnam County which is approximately 60 miles north of New York City. MNB remains a retail intrastate bank.

In May 2008, MNB acquired Sleepy Hollow Bank (SHB), a community bank with six branch locations in Westchester County and \$250 million in assets. These new branches and customer accounts were integrated into MNB, which now has \$835 million in total assets and a total of 15 branch locations as of December 31, 2008. There are fourteen full service branches and one limited service office in the three counties of Putnam, Dutchess, and Westchester. Five branches are located in Putnam County, three in Dutchess County, and seven in Westchester County. Six of the seven branches located in Westchester County were acquired through the acquisition of SHB. All of the branches have on-site ATMs. There were no branch closings during our evaluation period.

MNB is part of a three-bank holding company. The holding company is Tompkins Trustco Inc. (TTI) headquartered in Ithaca, New York. MNB's affiliates are Tompkins Trust Company and Bank of Castile. In addition to the bank affiliates, TTI also owns an insurance company and a financial planning company. TTI's total assets were \$2.9 billion at year-end 2008. None of the activities of the affiliates were considered in the preparation of this Performance Evaluation.

MNB's primary products include commercial real estate loans, residential mortgages, home equity lines of credit, small business loans and consumer installment loans. The bank also offers various personal and business deposit products, including savings accounts, investment management and trust services, remote deposit capture, health savings, and sweep accounts.

The bank has experienced strong growth over the past years. As of December 31, 2008, total assets were \$835 million, representing a 68% increase from the prior year, and a 75% increase from 2006. Total deposits increased 72% from 2007 to \$659 million as of December 31, 2008; this also represents a 60% increase from 2006. Total loans grew significantly to \$553 million, representing a 62% and 77% increase from 2007 and 2006 respectively. Most of the growth was acquired through the acquisition of SHB.

As of December 31, 2008, net loans and leases represented 66% of total assets. The loan portfolio was comprised of residential real estate loans (45%), commercial loans (54%), and loans to individuals (1%). Tier 1 Capital was \$56 million as of December 31, 2008 compared to \$37 million as of December 31, 2007.

MNB operates in a very competitive environment. The bank's competitors include local community banks, regional banks, non-bank financial institutions, and mortgage companies. As of June 30, 2008 FDIC Summary of Deposit data, MNB ranks 20th out of 28 institutions and holds 1.16% of the deposit market share in Dutchess County and ranks 84th out of 243 institutions at 0.07% in market share in Westchester/Putnam County. Institutions such as Keybank, TD Bank, JPMorgan Chase and Bank of America hold a larger portion and mainly dominate the market share of deposits in the bank's assessment area (AA).

MNB has the financial capacity to assist in meeting the credit needs of its AA. There are no legal, financial, or other factors which would impact the bank's ability to help meet the credit needs of its community.

The bank's performance under the Community Reinvestment Act was last evaluated on April 17, 2006, based upon standards applicable to large banks. The bank's overall level of performance was "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test for home mortgages reported under the Home Mortgage Disclosure Act (HMDA) and for small loans to business is from January 1, 2006 through December 31, 2008. The bank originated an insignificant amount of multi-family loans and did not originate any small loans to farms during the evaluation period; therefore an analysis of these products would not be meaningful and was not performed. The evaluation period for community development loans, investments, and service tests covers activities from April 18, 2006 through June 15, 2009.

Data Integrity

During March of 2009, an evaluation of the integrity of MNB's publicly filed information was performed to verify the accuracy of the data. The bank's processes, procedures, and internal controls for HMDA and CRA data collection, verification, and reporting are satisfactory. Errors were detected in the reported HMDA loan data; however, they were corrected prior to the start of the CRA examination. This examination was based on accurate data.

Community development (CD) loans, investments and services submitted by management were also verified to ensure that they met the regulatory definition for community development.

Selection of Areas for Full-Scope Review

We performed a full scope review of the bank's largest AA, Putnam – Westchester, which is part of the New York-White Plains-Wayne, NY-NJ Metropolitan Division (MD #35644). This AA accounts for 84% of total bank deposits. The bank originated 72% of its home mortgage loans and 73% of its small loans to businesses in this AA. The Putnam – Westchester AA consists of 94 census tracts (CTs) including all of Putnam County (19 CTs) and northern Westchester County (75 CTs). Please refer to appendix A for additional information.

The Dutchess AA was selected for a limited scope review. This AA is part of the Poughkeepsie – Newburgh – Middletown, NY Metropolitan Statistical Area (MSA #39100). This AA accounts for 16% of total bank deposits. The bank originated 28% of its home mortgage lending and 27% of its small loans to businesses in this AA. The Dutchess AA consists of 25 census tracts in Dutchess County.

Ratings

The bank's overall rating is based primarily on the full scope review of the Putnam-Westchester AA. The bank's activities within the Putnam-Westchester AA were given more weight as most of the bank's business is originated there, including 73% of loans and 84% of deposits. Additionally, 12 out of 15 branches are located within this AA. During the evaluation period, home mortgage products accounted for 28% of originated loans and small loans to businesses accounted for 72% of originated loans.

It is important to note that MNB's AA includes a total of 119 census tracts, the majority of which are middle- and upper-income level tracts, with only four moderate-income tracts in Westchester County; and no low-income tracts in either AA. Therefore, as part of the lending test, more weight was placed on the distribution of loans by income level of the borrower than on the distribution of loans by income level of the geography.

Other

During the examination, we interviewed the Chairman of a local chapter of a national business development agency in Putnam County to help us determine the community credit and development needs in the bank's AA. The organization's mission is to provide counseling for small business owners in order for them to be successful. The community contact indicated that there are opportunities for financial institutions to provide credit, grants, donations or other community development assistance.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Putnam - Westchester AA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Putnam-Westchester AA is adequate. The bank's lending patterns are reflective of the credit needs of the community. Approximately 73% of the bank's lending is conducted in this AA. The bank's lending is centered in small loans to businesses. In the 2006-2008 evaluation period; a total of 639 loans were reported, of which 539 loans were made to small businesses. Small loans to businesses represented 84% of the bank's lending in this AA. The bank did not originate any small loans to farms in the AA during the evaluation period.

The bank's lending to individuals is centered in home mortgage products. In the 2006-2008 evaluation period, 148 of the 543 loans reported were home mortgages. Approximately 27% of the bank's lending in the AA was in home mortgage products. Home purchase, home improvement, and home refinancing accounted for approximately 22%, 41%, and 36% of mortgage lending, respectively. The volume of multifamily loans was insignificant and was not considered as part of this evaluation.

Based on the 2008 FDIC Deposit Market Share Report, MNB was ranked 84th out of 243 institutions for its market share of deposits in the Putnam-Westchester AA, with a 0.07% market share as of June 30, 2008. In 2009, MNB had 12 branches and procured 84% of its deposits from within the AA. Large national banks were ranked as the top three institutions for market share of deposits in the AA.

Based on 2007 HMDA Peer Mortgage Data:

- Market share for home purchase, home refinance, and home improvement loans in all census tracts is 0.10%, 0.44%, and 2.27%, respectively
- In home purchase lending, the bank ranked 83rd out of 222 lenders
- In home refinance lending, the bank ranked 42nd out of 255 lenders
- In home improvement lending, the bank ranked 16th out of 92 lenders

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

It is important to note that a majority of the owner-occupied units in the AA were in upper-income tracts. Based on the 2000 U.S. Census Data, the bank has no low-income census tracts in the Putnam-Westchester AA. Therefore, analysis of lending in low-income tracts is not meaningful and was not performed. There are four moderate-income census tracts within the bank's AA. Performance in moderate-income census tracts is given more weight since there are no low-income census tracts in the AA. However, opportunities for the bank were limited in the AA as only 0.89% of housing units in the moderate-income census tracts were owner occupied.

Home Purchase Lending

The geographic distribution of home purchase loans is adequate. The percentage of home purchase loans distributed in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in these geographies. The bank's market share in these geographies is less than the bank's overall market share of all home purchase loans in the AA. The volume of owner-occupied units in moderate-income geographies provided limited opportunities for the bank with only 0.89% of owner-occupied units in these geographies.

Home Improvement Lending

The geographic distribution of home improvement loans is adequate. The percentage of home improvement loans distributed in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in these geographies for the evaluation period. The bank's market share in these geographies is less than the bank's overall market share of all home improvement loans in the AA. The volume of owner occupied units in moderate-income geographies provided limited opportunities for the bank with only 0.89% of owner-occupied units in these geographies.

Home Refinancing Lending

The geographic distribution of home refinancing loans is excellent. The percentage of home refinance loans distributed in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share in these geographies is somewhat lower than the bank's overall market share of all home refinance loans in the AA.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of loans to small businesses is adequate. The percentage of small loans to businesses distributed in moderate-income geographies is somewhat lower than the percentage of all businesses in these geographies. The volume of businesses in the moderate-income geographies provided limited opportunities for the bank with only 3.57% of businesses in the AA.

Lending Gap Analysis

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in MNBs lending patterns.

Inside/Outside Ratio

We performed an analysis of MNBs lending within its AA at the bank level as opposed to the individual AA levels. A substantial majority of home mortgage loans and community development (CD) loans, 83%, were originated inside in the AA for the evaluation period. Seventy-eight percent of all home purchase loans were within the AA; 82% of all home refinancing loans were within the AA; and 70% of all home improvement loans were within the AA. Eighty-four percent of small business loans and 58% of community development loans were in the AA. This performance factored positively into the overall analysis of the geographic distribution of lending by income level of geography.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower distribution for home mortgage lending is adequate when considering the limited opportunities that low-and moderate-income individuals have in purchasing a home in the AA. According to 2000 census data, the median cost of housing in the Putnam-Westchester AA is \$261,367. The HUD adjusted median family income for 2008 was \$63,000. A low-income individual earns less than \$31,500 annually. A moderate-income individual earns at least \$31,500 and less than \$50,400 annually. In addition, 5% of households in the AA are below the poverty level.

Home Purchase Lending

Borrower distribution of home purchase lending is adequate. The bank did not make any loans to low-income families, while 8.49% of families in the AA are low-income. It is important to note that this demographic presented limited opportunities for the bank. This takes into consideration the competitiveness of the market as well as the high cost of housing in this area which makes it difficult for low-income individuals to afford housing.

The percentage of home purchase loans made to moderate-income families is near to the percentage of moderate-income families in the AA. The market share of home purchase loans to moderate-income borrowers is less than the bank's overall market share of all home purchase loans in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is good. The percentage of home improvement loans made to low-income families exceeds the percentage of low-income

families in the AA. The market share of home improvement loans to low-income borrowers exceeds the bank's overall market share of all home improvement loans in the AA. During the same evaluation period, the percentage of home improvement loans made to moderate-income families was near to the percentage of moderate-income families in the AA. The market share of home improvement loans in the moderate-income geographies exceeded the bank's overall market share of home improvement loans in the AA.

Home Refinancing Lending

The borrower distribution of home refinance loans is adequate. The percentage of home refinance loans made to low-income families was lower than the percentage of low-income families in the AA. The market share of home refinancing loans in the low-income geographies was less than the bank's overall market share of home refinancing loans in the AA. This demographic presented limited opportunities for the bank due to the high cost of housing in the area. In addition, the high level of competition in the AA limits the number of opportunities available to the bank. The percentage of home refinancing loans made to moderate-income families was somewhat lower than the percentage of moderate-income families in the AA, 8.76%. The market share of home refinancing loans in the moderate-income geographies exceeds the bank's overall market share of home refinance lending.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The percentage of the bank's small loans to businesses with revenues of \$1 million or less is near to percentage of small businesses in the AA.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The level of community development (CD) lending is good and had a positive impact on the lending test, as the loans originated by MNB were responsive to the needs of the AA.

The bank has been successful and originated seven CD loans totaling \$7.8 million in the AA. To enhance CD lending, given limited opportunities due to demographics and competition in the AA, MNB has worked closely with statewide and local economic and business development organizations to generate CD lending opportunities.

Given the limited opportunities for CD lending in the AA, the bank has generated CD loans that benefit the broader MSA and regional area (New York City), which we considered as part of our assessment. MNB has been innovative in partnering with statewide business development organizations to better serve the AA with CD loans, and to expand, where possible, to the broader region.

The following loans are examples of the \$7.8 million of CD lending in the Putnam-Westchester AA:

- A total of \$1.4 million in loans to an organization that provides care facilities and residential alternatives to low- and moderate-income individuals with disabilities.
- A letter of credit for a developer totaling \$4.3 million to build an apartment building to revitalize an LMI area and create affordable housing units.

Outside of the AA but within the broader geographical area, the bank made \$3 million in CD loans. The following are examples:

- A \$784 thousand loan that helped create seven new jobs while retaining 15 jobs. The loan was made to a LMI area in Bronx County to promote economic activity.
- A \$850 thousand loan in Orleans County to bring a new business to the area and revitalize the local economy. This loan is projected to create six jobs while retaining 10.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the lending test conclusion. The bank offers standard loan products.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the lending test in the Dutchess AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test.

Dutchess AA

Lending activity in the Dutchess AA is adequate. The bank's lending patterns are reflective of the credit needs of the community. Approximately 27% of the bank's lending is conducted in this AA. The bank's lending is centered in loans to small businesses. In the 2006-2008 evaluation period, out of a total of 202 loans reported, 144 loans were made to small businesses. Small loans to businesses represented approximately 71% of the bank's lending in this AA. There was no small farm credit lending during the evaluation period.

The bank's lending to individuals is centered in home mortgage products. In the 2006-2008 evaluation period, of the 202 loans reported, 58 loans were home mortgages. Approximately 29% of the bank's lending in the AA was in home mortgage products. Home purchase, home improvement, and home refinancing accounted for approximately 34%, 18%, and 48% of mortgage lending, respectively. There was no multifamily lending during the evaluation period.

Based on the 2008 Deposit Market Share Report, Mahopac National Bank was ranked 20th out of 28 institutions in deposit market share in the Dutchess AA, with a 1.16% market share as of June 30, 2008. In 2009, Mahopac National Bank had 15 branches and approximately 16% of its deposits in the AA.

Based on 2007 HMDA Peer Mortgage Data:

- Market share for home purchase, home refinance, and home improvement loans in all census tracts is 0.24%, 0.35%, 0.39%, respectively
- In home purchase lending, the bank ranked 53rd out of 147 lenders
- In home refinance lending, the bank ranked 51st out of 176 lenders
- In home improvement lending, the bank ranked 32nd out of 67 lenders

The following loan is an example of the \$1.6 million in CD lending for the Dutchess AA:

- \$820 thousand loan for a Dutchess County not-for-profit organization to revitalize their facility for youth programs targeted at LMI individuals. This loan promotes economic development and revitalizes the community.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Putnam-Westchester AA is good.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

We determined that there is strong competition for investment opportunities within the Putnam-Westchester AA. As a result, MNB made CD investments in the broader geographical areas within New York State, for which they received positive consideration, and made qualifying CD grants within the AA.

During the evaluation period, MNB disbursed 23 qualifying community development grants, totaling \$39,445. These grants were primarily granted to economic development companies to assist small businesses within the Putnam-Westchester AA. In addition, grants were made to organizations that provide community services, such as food banks, within the Putnam-Westchester AA.

Examples of grants made within the AA include:

- 6 donations, totaling \$14,600 to food banks in the AA.
- 3 donations, totaling \$12,000 to an economic development corporation, which provides counseling to small businesses, with the aim of expanding the workforce in Putnam County.
- 4 donations, totaling \$3,800 a non profit group of retired business executives who provide guidance to individuals in a variety of small business and financial areas.
- 4 donations, totaling \$2,300 to an organization that promotes and supports local businesses.

Due to the limited opportunities within the AA and the strong competition for CD investments, MNB made qualifying CD investments in the broader geographical areas within New York State that include their designated AAs, but do not benefit them directly. During the evaluation period, the bank purchased seven municipal bonds, totaling \$1,865,000 for counties and school districts in distressed or underserved areas of New York State. MNB also contributed a

total of \$33,602 to a federal housing program that funded affordable housing initiatives in the region.

Additionally, three prior period investments in CRA Mortgage Backed Security (MBS) pools, totaling \$2,449,019 and \$1,500,000 of membership shares in an economic development fund remain on the bank's balance sheet. All of the mortgages in the MBS pools benefit LMI individuals within the bank's broader geographical area, and received positive consideration for qualified investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the investment test in the Dutchess AA is not inconsistent with the bank's overall High Satisfactory performance under the Investment Test. During the evaluation period, the bank made 6 qualifying CD grants totaling \$5,955 in the Dutchess AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Putnam-Westchester AA is good.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

MNB's service delivery systems are good, as they are accessible to geographies and individuals of different income levels in the AA. MNB generally serves upper-income communities, given that 97% of the Putnam-Westchester AA is considered upper-income. The bank operates 12 of its 15 branches in the AA, including one branch in a moderate-income census tract. Each branch location offers all bank services including ATMs and night deposit. Branch operating hours and locations are good, as they satisfactorily serve the needs of the AA population. Most branches, including the branch in the moderate-income census tract, offer extended operating hours one day per week, in addition to Saturday hours at most locations.

Alternate delivery services are offered such as banking by phone, mail, website, remote deposit capture, and deploying customer service representatives to homes and businesses. MNB's website provides all customers with 24/7 access to account balances, funds transfers, account statements, check imaging, and bill payments. Information related to identity theft and phishing is provided to customers. Remote deposit capture is now offered, in addition to the "GoBanking" service that will pickup non-cash deposits and loan applications from small business customers. Customer service representatives can also be sent to any customer's home or business to discuss and begin the loan application process.

Community Development Services

MNB actively engages with the communities it serves by providing a good level of CD services to the Putnam-Westchester AA. Many members of bank management and their employees are involved in community service activities on an ongoing basis. During our review, we found that bank management participated in qualified CD services (see examples below). The organizations that the bank participates with mainly benefit the AA by providing financial services consulting including the process to create a small business, review loans made by the economic development organizations, educational outreach, and other activities.

The following are examples of CD services provided by MNB employees in the AA:

- The bank's compliance officer serves on the Board of Directors of a committee that promotes the revitalization of the area to positively impact the local economy.
- The President serves on the advisory board of a local organization that provides support to new small business owners including filing proper documentation and securing loans.
- The President serves on the Board of Directors for a Putnam County non-profit organization that serves to attract and retain new businesses and job opportunities for Putnam County.

Additionally, MNB participates in two programs that aid in New York State obtaining economic benefits and stimulus. The bank in turn is expected to use these funds to stimulate local economic development.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Service Test in the Dutchess County is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/06 to 12/31/08) Investment and Service Tests and CD Loans: (01/01/06 to 12/31/08)	
Financial Institution	Products Reviewed	
The Mahopac National Bank (MNB) Mahopac, NY	Home Mortgages, Small Loans to Businesses, Community Development Loans, Qualified CD Investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Putnam – Westchester AA (New York-White Plains-Wayne, NY-NJ MD #35644)	FULL SCOPE	This AA does not arbitrarily exclude LMI areas.
Dutchess AA (Poughkeepsie- Newburgh-Middletown, NY MSA # 39100)	LIMITED SCOPE	

Appendix B: Market Profiles for Full-Scope Areas

Putnam - Westchester AA

Demographic Information for Full-Scope Area: Putnam – Westchester						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	94	0.00	4.26	7.45	87.23	1.06
Population by Geography	421,942	0.00	3.41	7.79	88.80	0.00
Owner-Occupied Housing by Geography	107,799	0.00	0.89	4.18	94.93	0.00
Businesses by Geography	41,037	0.00	3.57	7.10	89.32	0.01
Farms by Geography	970	0.00	2.06	4.43	93.51	0.00
Family Distribution by Income Level	109,628	8.49	8.76	14.16	68.60	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	18,908	0.00	8.10	14.79	77.11	0.00
Median Family Income	= \$49,461					
HUD Adjusted Median Family Income for 2008	= \$63,000					
Households Below the Poverty Level	= 5%					
			Median Housing Value	= \$261,367		
			Unemployment Rate	= 1.73%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2008 HUD updated MFI.

MNBs full scope AA consists of Putnam County and northern Westchester County. This AA is part of the New York - White Plains - Wayne, NY - NJ Metropolitan Division (MD# 35644). The bank's AA is comprised of census tracts in two out of the eight counties within the MD. Seventy-five of the 221 census tracts in Westchester County (County #119) and all census tracts of Putnam County (County #79) are included in the AA. There are a total of 94 census tracts in this AA. Twelve of the bank's 15 branches are within the AA. MNB offers a traditional line of banking products and services for loans and deposits.

The AA is primarily comprised of upper- and middle-income level census tracts, with only four moderate-income level census tracts in the AA, and no low-income level census tracts. The median household income in Putnam County and Westchester County in 2007 was \$84,622 and \$77,097 respectively. The majority, 84.26%, of the bank's total deposits are from within the Putnam – Westchester AA.

In the AA, banking competition is strong for loans, deposits, CD loans, and CD investment, which presents limited opportunities for smaller institutions with a weaker presence. As of June 30, 2008 FDIC Summary of Deposit data, MNB holds 0.07% of the deposit market share in the Putnam - Westchester County AA. JPMorgan Chase, Bank of America NA, and Citibank NA hold a larger portion the market share of deposits in the bank's AA at 29.8%, 8.6% and 8.0%, respectively.

The economy in the area is stable. Based on commuting data available for both counties, Westchester County and Putnam County are bedroom communities. The largest industry, based on NAICS codes within the AA, is Professional, Scientific, and Technical Services. Major employers in Putnam County include: Putnam Hospital Center, Mahopac School District, Carmel Central School District, County of Putnam, Brewster Central School District, and Watson Laboratories Inc. Major employers in Westchester County include: IBM Corp, County of Westchester, Yonkers Public Schools, Westchester Medical Center, United States Postal Service District Office, and Verizon Communications.

Appendix C: Tables of Performance Data

Comment [c1]: According to LL checklist, all tables must be included, even if they are empty. If they are empty, n/a needs to be put in columns.

For products where there is a limited number and was not analyzed, product information still needs to be included in the tables. The scope section would explain why it was not used.

If possible see if all tables can be copied over from CRA Wiz output, because there were some issues with footnotes

Content of Standardized Tables

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. **This table is not applicable.**

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area. **This table is not applicable.**
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1

million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available. **This table is not applicable.**

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area. **This table is not applicable.**

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												Geography: Mahopac National Bank				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008			
MA/Assessment Area (2008):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***							
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)								
Full Review:																			
Putnam – Westchester AA	72.89	148	33,755	395	69,256	0	0	7	7,801	550	110,812	84.26							
Limited Review:																			
Dutchess AA	27.11	58	16,594	144	25,948	0	0	3	1,628	205	44,170	15.74							
Statewide/Regional with Potential to Benefit AA:																			
								5	3,009	5	3,009								

* Loan Data as of December 31, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2006 to December 31, 2008.

*** Deposit Data as of June 22, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: Mahopac NB

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Mahopac National Bank				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Putnam – Westchester AA	32	61.54	0.00	0.00	0.89	0.00	4.18	3.13	94.93	96.88	0.09	0.00	0.00	0.00	0.10
Limited Review:															
Dutchess AA	20	38.46	0.00	0.00	0.00	0.00	58.76	75.00	41.24	25.00	0.24	0.00	0.00	0.25	0.23

* Based on 2007 Peer Mortgage Data (Eastern)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Institution ID: Mahopac NB

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: Mahopac National Bank						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Putnam – Westchester A	60	85.71	0.00	0.00	0.89	0.00	4.18	0.00	94.93	100.00	2.29	0.00	0.00	0.00	2.49
Limited Review:															
Dutchess AA	10	14.29	0.00	0.00	0.00	0.00	58.76	40.00	41.24	60.00	0.39	0.00	0.00	0.00	0.92

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Institution ID: Mahopac NB

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: Mahopac National Bank						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Putnam – Westchester AA	53	65.43	0.00	0.00	0.89	1.89	4.18	1.89	94.93	96.23	0.44	0.00	0.00	0.35	0.45
Limited Review:															
Dutchess AA	28	34.57	0.00	0.00	0.00	0.00	58.76	71.43	41.24	28.57	0.35	0.00	0.00	0.47	0.18

* Based on 2007 Peer Mortgage Data (Eastern)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Institution ID: Mahopac NB

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: Mahopac National Bank								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Putnam – Westchester A	395	73.28	0.00	0.00	3.57	1.52	7.10	1.52	89.32	96.96	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Dutchess AA	144	26.72	0.00	0.00	0.00	0.00	62.61	45.83	37.39	54.17	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

** Based on 2007 Peer Small Business Data -- US and PR

*** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Source Data - Dun and Bradstreet (2008).

Institution ID: Mahopac NB

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Mahopac National Bank								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans	% Families	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Putnam – Westchester AA	32	61.54	8.49	0.00	8.76	7.14	14.16	17.86	68.60	75.00	0.10	0.00	0.00	0.35	0.08
Limited Review:															
Dutchess AA	20	38.46	10.56	18.75	16.31	18.75	25.25	25.00	47.88	37.50	0.27	2.04	0.75	0.00	0.24

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 15.4% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

Institution ID: Mahopac NB

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: Mahopac National Bank				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans	% Families	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****					
Full Review:															
Putnam – Westchester AA	60	85.71	8.49	8.62	8.76	6.90	14.16	8.62	68.60	75.86	2.25	5.88	10.26	1.82	1.85
Limited Review:															
Dutchess AA	10	14.29	10.56	0.00	16.31	0.00	25.25	50.00	47.88	50.00	0.39	0.00	0.00	0.92	0.26

** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.
 *** Percentage of Families is based on the 2000 Census information.

Institution ID: Mahopac NB

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Mahopac National Bank						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans	% Families	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans**	Overall	Low	Mod	Mid	Upp
Full Review:															
Putnam – Westchester A	53	65.43	8.49	1.96	8.76	5.88	14.16	19.61	68.60	72.55	0.51	0.00	1.69	0.45	0.47
Limited Review:															
Dutchess AA	28	34.57	10.56	0.00	16.31	13.64	25.25	13.64	47.88	72.73	0.36	0.00	0.25	0.13	0.57

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 9.9% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

Institution ID: Mahopac NB

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
				Geography: Mahopac National Bank			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Putnam – Westchester A	395	73.28	69.51	66.58	62.03	17.22	20.76	0.00	0.00
Limited Review:									
Dutchess AA	144	26.72	67.04	77.08	61.11	14.58	24.31	0.00	0.00

* Based on 2007 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2008).

Table 14.

Institution ID: Mahopac NB

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Mahopac National Bank				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Putnam – Westchester A	3	6.5	23	39.5	26	46	0.78	0	0
Limited Review:									
Dutchess AA	0	0	6	6	6	6	0.10	0	0
Statewide/Regional with Potential to Benefit AA:									
	4	3,948	11	1,899	15	5,847	99.12	0	0

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

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

Institution ID: Mahopac NB

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: Mahopac National Bank			
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Putnam – Westchester A	84.26	12	80.00	0.00	8.33	8.33	83.33	7	0	0	1	1	5	0.00	3.41	7.79	88.80
Limited Review:																	
Dutchess AA	15.74	3	20.00	0.00	0.00	33.33	66.67	1	0	0	0	1	0	0.00	0.00	61.33	38.67

Institution ID: Mahopac NB

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: Mahopac National Bank						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Putnam – Westchester A	84.26	12	80.00	0.00	8.33	8.33	83.33	12	80.00	0	1	1	10	0.00	3.41	7.79	88.80
Limited Review:																	
Dutchess AA	15.74	3	20.00	0.00	0.00	33.33	66.67	3	20.00	0	0	1	2	0.00	0.00	61.33	38.67