



PUBLIC DISCLOSURE

January 4, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens National Bank of Hammond
Charter Number 10216

19 Main Street
Hammond, NY 13646

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite 102B
East Syracuse, NY 13057

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

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Overall CRA Rating

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 state of New York, which demonstrated an overall reasonable distribution of loans to borrowers of different income levels based upon an excellent distribution of consumer loans and reasonable distribution of home mortgage loans.
- The bank's reasonable loan-to-deposit ratio during the evaluation period.
- A majority of home mortgage loans and consumer loans originated during the evaluation period were within the bank's assessment area (AA).

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is reasonable. Since the last CRA evaluation, The Citizens National Bank of Hammond's (CNBH) quarterly average loan-to-deposit ratio, which is calculated on a bank-wide basis, was 64.6 percent. CNBH is the only bank headquartered in the AA. The substantial majority of the banks serving St. Lawrence County are much larger or are Savings Banks with different deposit sources. However, one similarly situated institution headquartered in an adjacent county along the St. Lawrence River, having three branches and assets below \$100 million, provides a reasonable comparison for CNBH. Its loan-to-deposit ratio during the evaluation period was 54.1 percent.

Lending in Assessment Area

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

The bank originated and purchased 78.2 percent of its total loans inside the bank's AA 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	34	77.3	10	22.7	44	\$3,331	79.4	\$862	20.6	\$4,193
Consumer	34	79.2	9	20.9	43	\$380	87.9	\$53	12.2	\$433
Total	68	78.2	19	21.8	87	\$3,711	80.2	\$915	19.8	\$4,626

*Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data
Due to rounding, totals may not equal 100.0*

Description of Institution

CNBH is an intrastate bank headquartered in Hammond, New York (N.Y.). The bank is a small community bank established in 1912. The bank does not have any subsidiaries or a holding company.

The bank operates within the state of New York with a single AA. In addition to the main office located in Hammond, N.Y., the bank has one branch located in Morristown, N.Y. The bank offers non-complex deposit accounts and basic lending products. Neither the main office, nor the branch have automated teller machines (ATM) or drive-up banking facilities. The bank offers its customers debit cards that can be used at non-proprietary ATMs, and the bank charges a fee related to this activity. CNBH does not offer on-line banking services. The bank's business strategy is to meet the needs of the community from which it draws deposits. The bank did not open or close any branch offices during the evaluation period, nor were there any mergers or acquisitions.

As of the December 31, 2019, the bank had total assets of \$23.4 million. Total loans were \$16.1 million, consisting of 69.3 percent residential real estate, 17.8 percent consumer, 7.4 percent commercial and industrial, 4.4 percent commercial real estate, and 1.2 percent farmland. Total deposits were \$21.1 million. The bank's tier 1 capital was \$2.2 million.

There were no financial or legal impediments to hinder the bank's ability to help meet the credit needs of the communities it services. The bank's CRA performance was rated Satisfactory in the last public evaluation dated August 29, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance using the small bank procedures. For this evaluation, the OCC primarily relied on the lending test to determine the bank's overall rating. The lending test evaluates the bank's record of meeting the credit needs of its AA through its primary product lending activities in home mortgages and consumer loans. The evaluation period for this test is January 1, 2017 to December 31, 2019. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

The bank is not subject to Home Mortgage Disclosure Act (HMDA) requirements and does not file a HMDA Loan Application Register (LAR). Home mortgage information used for the Lending Test is based on a sample of loans, rather than on total bank originations and purchases over the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated 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 solely on its performance in the state of New York, which consists of one AA, the St. Lawrence non-MSA AA. Examiners placed more weight on the bank’s consumer lending as this represented the substantial majority of the bank’s lending within the AA.

The state ratings are based on performance in the bank’s AAs. Refer to the “Scope” section under the 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) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution’s next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A reasonable distribution of loans to borrowers of different income levels within the AA during the evaluation period.

Description of Institution's Operations in New York

The bank has designated a single AA located in the state of New York, the St. Lawrence non-MSA AA. The AA consists of two census tracts in northwestern corner of St. Lawrence County.

CNBH's AA is in the northwestern corner of St. Lawrence County and has the St. Lawrence River as its northern boundary. Per the 2015 American Community Survey (ACS) data, the AA contains two census tracts, both of which are middle-income. However, both census tracts were reported as distressed or underserved in 2018 and 2019; but were not reported on the list for 2017. St. Lawrence County is the largest county, by area, in New York State. The county is, in fact, the largest land mass county east of the Mississippi, and with its low population, it is one of the most rural. The AA is not located within an MSA and contains one state park within its coverage area. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies.

CNBH operates two branch locations within the AA. The Hammond headquarters location and one additional branch located approximately 10 miles east in Morristown, N.Y. The bank offers non-complex deposit accounts, such as checking accounts and saving accounts, including certificate of deposits with competitive rates and maturity dates. The bank has specific deposit products tailored to minors, students, senior citizens, and businesses. Additionally, the bank offers basic lending products such as mortgages, personal and auto loans, and agricultural and commercial loans. The bank offers services including but not limited to cashier checks, money orders, debit card replacements, safety deposit boxes, incoming/outgoing wires and faxes, and check cashing for non-customers for a fee. No new products or services have been introduced since the prior CRA Evaluation.

According to the 2015 ACS data, the total population in the AA is 5,171 persons consisting of 1,440 families and 2,064 households. The income distribution of families in the AA, (the standard measurement for home loan distribution), is 22.2 percent low-income, 21.4 percent moderate-income, 23.7 percent middle-income and 32.7 percent upper income. The 2019 FFIEC updated median family income in the AA was \$66.2 thousand, up from approximately \$59.6 thousand in 2015. The income distribution of households in the AA, (the standard measurement for consumer loan distribution), is 24.6 percent low-income, 16.2 percent moderate-income, 19.2 percent middle-income and 40.0 percent upper income. Approximately 13.5 percent of households reporting income below the poverty level.

There are 4,649 total housing units in the AA of which approximately, 35.8 percent are owner-occupied; 8.6 percent are rental; and 55.6 percent are vacant units. The high housing vacancy rate is due in part to

the seasonal nature of many of the homes in the AA. The ACS 2015 median housing value was approximately \$84 thousand, which is consistent with the \$89.5 thousand 2019 median housing sales price in the county, as reported by the New York State Department of Taxation. The weighted average age of housing stock in the AA is 56 years.

There is competition in the AA primarily stemming from larger community banks, saving and loans association, and credit unions. Peer mortgage data shows HMDA reporting banks and their market share in the AA. Community Bank, N.A. is the largest competitor for residential loans with 21.1 percent market share. Northern Credit Union and Movement Mortgage are the next largest residential lenders in the area with market shares of 12.2 and 10.0 percent, respectively.

As of June 30, 2019, there were four FDIC-insured institutions operating in the AA. These financial institutions had five offices in the AA, with deposits totaling \$159.6 million. CNBH ranked fourth with a 13.0 percent deposit market share. The deposit market in the AA was dominated by two institutions whose combined market share totaled 71.8 percent; specifically, Gouverneur Savings and Loan Association with 39.1 percent and Community Bank, N.A., with 32.7 percent.

The overall economy in the AA was stable over the evaluation period. The unemployment rate in St. Lawrence County was 5.7 percent in December 2019, 5.1 percent in December 2018 and 6.4 percent in December 2017, all above the unemployment rate of 4.0 percent in New York State. The AA has experience shrinkage in business operations year-over-year.

Major employers in the AA are local and state governments, including schools and prisons. The healthcare and social assistance industry is the largest private employment sector. Per the most recent 2018 Dunn and Bradstreet (D&B) data, there were 223 businesses in the AA, including 28 farms. The AA has a high concentration of small businesses. Of those businesses reporting, 83.9 percent reported revenues of \$1 million or less, including all farms; and 76.2 percent of all businesses and farms reported having between one and four employees, demonstrating reduced employment opportunities, with individuals seeking work outside of the AA. Approximately 4.1 percent of the workforce in the AA have a commutes time exceeding 90 minutes. As there is no public transportation, families must provide their own form of transportation to commute far distances, a higher expense to low- and moderate-income borrowers. Service industries accounted for 31.4 percent of these businesses with construction accounting for 13.9 percent and agriculture/forestry and fishing accounting for 12.6 percent.

As part of the CRA Evaluation, the OCC conducted a community contact within the AA to determine local economic conditions and community needs. The contact is a community action agency that serves the housing and community development and revitalizing needs of the rural communities in St. Lawrence County. The contact identified the need for job opportunities, housing infrastructure improvements, and affordable housing within the county. The contact noted that financial institutions in the area are generally responsive to community needs.

The following table provides a summary of the demographics that includes housing, business, and farm information for the St. Lawrence non-MSA AA.

St. Lawrence non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: St. Lawrence non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	5,171	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	4,649	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	1,665	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	399	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	2,585	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	195	0.0	0.0	100.0	0.0	0.0
Farms by Geography	28	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	1,440	22.2	21.4	23.7	32.7	0.0
Household Distribution by Income Level	2,064	24.6	16.2	19.2	40.0	0.0
Median Family Income Non-MSA - NY	\$59,570	Median Housing Value				\$83,976
		Median Gross Rent				\$686
		Families Below Poverty Level				13.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in New York

The OCC conducted a full-scope review of the St. Lawrence non-MSA AA. There were no limited-scope areas to review. Consumer loans were given more weight than home mortgage loans when arriving at the bank's overall lending performance, given its proportion of originations and purchases throughout the evaluation period. Consumer loans represented 81.4 percent (by number) and 46.9 percent (by dollar) of total originations and purchases in the evaluation period.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the St. Lawrence non-MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

A geographic distribution analysis of home mortgage and consumer loans was not completed for this evaluation period. The bank's assessment area does not include census tracts of low- and moderate-income levels; therefore, completing the assessment would not be meaningful.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 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.

The borrower distribution of home mortgage loans in the AA was reasonable.

During the evaluation period, the percentage of home mortgages made to low-income borrowers is below the percentage of low-income families in the AA. The percentage of home mortgages made to moderate-income borrowers is below the percentage of moderate-income families. While the bank's percentage of lending of home mortgage loans to low- and moderate-income borrowers was below the percentage of low- and moderate-income families in the St. Lawrence non-MSA AA, the distribution to low-income borrowers significantly exceeded and to moderate-income borrowers exceeded the aggregate industry distribution percentage.

Consumer Loans

Refer to Table V 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 consumer loan originations and purchases.

CNBH has excellent distribution of loans to individuals of different income levels.

During the evaluation period, consumer loans made to low-income borrowers exceeded the percentage of low-income households in the AA. Consumer loans made to moderate-income borrowers exceeded the percentage of moderate-income households in the AA. This is evident of the bank's willingness to lend lower dollar installment loans to its customers.

Responses to Complaints

The Citizens National Bank of Hammond did not receive any CRA related complaints during the evaluation period.

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 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”.

Time Period Reviewed:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Home mortgage and consumer loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
St. Lawrence non-MSA AA	Full-Scope	St. Lawrence County, NY (partial)

Appendix B: Summary of MMSA and State Ratings

RATINGS	The Citizens National Bank of Hammond
Overall Bank:	Lending Test Rating
The CNB of Hammond	Satisfactory
MMSA or State:	
New York	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2017-2019		
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
St. Lawrence non-MSA AA	34	3,331	100.0	22.2	14.7	6.7	21.4	17.7	13.3	23.7	29.4	20.0	32.7	38.2	57.8	0.0	0.0	2.2
Total	34	3,331	100.0	22.2	14.7	6.7	21.4	17.7	13.3	23.7	29.4	20.0	32.7	38.2	57.8	0.0	0.0	2.2

Source: 2015 ACS U.S Census; 01/01/2017 - 01/01/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
St. Lawrence non-MSA AA	34	380	100.00	24.6	35.3	16.2	17.6	19.2	29.4	40.0	17.6	0.0	0.0	
Total	34	380	100.00	24.6	35.3	16.2	17.6	19.2	29.4	40.0	17.6	0.0	0.0	

Source: 2015 ACS U.S Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0