

PUBLIC DISCLOSURE

February 12, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fieldpoint Private Bank & Trust
RSSD No. 3664588

100 Field Point Road
Greenwich, CT 06830

FEDERAL RESERVE BANK OF NEW YORK
33 LIBERTY STREET
NEW YORK, NY 10045

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, nor should it 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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INSTITUTION

INSTITUTION'S CRA RATING: This institution is rated: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The satisfactory performance of Fieldpoint Private Bank & Trust ("Fieldpoint") with regard to the Community Reinvestment Act ("CRA") is based on the following performance criteria:

- The loan-to-deposit ratio was reasonable given the bank's size, financial condition, and assessment areas' credit needs;
- A majority of loans and other lending-related activities were in the assessment areas;
- There was poor penetration among individuals of different income (including low- and moderate-income) levels;
- The geographic distribution of loans reflected reasonable dispersion throughout the assessment areas;
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation; and
- The bank's community development performance demonstrated adequate responsiveness to community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

SCOPE OF EXAMINATION

Procedures

Fieldpoint's performance was evaluated using the Federal Financial Institutions Examination Council ("FFIEC") Intermediate Small Institution Examination Procedures. These procedures include a lending test, which evaluates the bank's record of meeting the credit needs of its assessment areas through its lending activities and a community development test, which evaluates the bank's responsiveness to community development needs in its assessment areas.

Fieldpoint maintains two assessment areas: MD 35614 (New York-Jersey City-White Plains, NY-NJ), which consists of all of New York County; and MSA 14860 (Bridgeport-Stamford-Norwalk, CT), which consists of a portion of Fairfield County. Both of these assessment areas were evaluated using a full-scope review.

As shown in the table below, the lending test evaluation covered the period from January 1, 2014 to December 31, 2016. The assessment period for Fieldpoint’s community development activities was from April 1, 2014 to December 31, 2017.

PERFORMANCE CRITERION	EVALUATION PERIOD
Loan-to-Deposit Ratio	January 1, 2014 – December 31, 2016
Lending in Assessment Areas	January 1, 2014 – December 31, 2016
Borrower Distribution of Loans	January 1, 2014 – December 31, 2016
Geographic Distribution Of Loans	January 1, 2014 – December 31, 2016
Response to CRA Complaints	January 1, 2014 – December 31, 2016
Community Development Lending	April 1, 2014 – December 31, 2017
Qualified Investments	April 1, 2014 – December 31, 2017
Community Development Services	April 1, 2014 – December 31, 2017

Products

The lending products reviewed during the evaluation included home purchase, refinancing, home improvement, and multifamily mortgage loans reported as required under the Home Mortgage Disclosure Act (“HMDA”). The entire universe of HMDA-related loans reported in 2014, 2015, and 2016 was used in the lending test analysis. Fieldpoint submitted community development loans, qualified investments, grants, and services, which were reviewed as part of the community development test.

Lending Distribution Analysis

The analyses of borrower and geographic distribution were based on loans made in Fieldpoint’s assessment areas. In order to analyze the borrower characteristics of HMDA-related loans, the proportions of originations to low- and moderate-income (“LMI”) and non-LMI borrowers was compared with the proportions of LMI and non-LMI families in the assessment areas. Income estimates from the FFIEC were used to categorize borrower income. FFIEC-adjusted median family income (“MFI”) figures for 2014, 2015, and 2016 were used to categorize borrower income levels for 2014, 2015, and 2016 loans, respectively. Because the volume of HMDA-related loans was too low to conduct a meaningful analysis for the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area, the overall borrower distribution rating is solely based upon the rating in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area.

To evaluate the geographic distribution of HMDA-related loans, the proportion of loan originations in LMI and non-LMI geographies were compared with the proportion of owner-occupied housing units in LMI and non-LMI geographies. Performance with regard to geographic distribution in low-income geographies was analyzed separately from performance in moderate-income geographies.

Because loan volumes were too low to conduct a meaningful analysis for each of the HMDA-related product types and for each of the years during the evaluation period, HMDA-related

lending was combined for all product types for all three years of the evaluation period in order to conduct the analysis. All product types were given equal weight for the analysis. Fieldpoint's HMDA-related lending was compared to the average of the aggregate for the three years during the evaluation period.

Because the bank originated a low volume of small business loans, which are loans in the amount of \$1 million or less, during the evaluation period, the volume was deemed too insignificant to conduct a meaningful analysis.

Peer data was used for the loan-to-deposit ratio analysis. In order to choose similarly-situated banks within the assessment areas, local peer banks were selected based on the amount of deposits and the number of branches. Fieldpoint's loan-to-deposit ratio was also compared to its national peer group.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews with one agency located in MD 35614 (New York-Jersey City-White Plains, NY-NJ) and one agency located in MSA 14860 (Bridgeport-Stamford-Norwalk, CT). One organization's mission was to promote affordable housing in its community, and the other organization's mission was to promote economic development in its locality. These entities stressed the need for all types of community development, including affordable housing, financing for economic development projects, and community services that target financial literacy and financial expertise programs for various community development programs. Examiners also leveraged community contacts that were located in the bank's assessment areas from prior bank CRA evaluations to assist in developing performance context.

DESCRIPTION OF INSTITUTION

Fieldpoint is a federally chartered savings bank that began operations in April 2008. Fieldpoint is headquartered in Greenwich, CT, maintains two branches, and is owned by the bank holding company Fieldpoint Private Holdings. Fieldpoint is primarily a wealth management and investment advisory bank and maintains the business unit Fieldpoint Private Securities, LLC. The bank meets the retail and community development needs of its community by offering consumer products and services, including retail deposit products, home mortgages, refinances, and home improvement loans. Fieldpoint also offers commercial loans, including commercial and industrial loans, multifamily loans, and loans secured by commercial real estate. Consistent with its overall business strategy, Fieldpoint's products and services are designed primarily for its high net worth clients.

As of December 31, 2016, Fieldpoint maintained total assets of \$858.6 million. As shown in the table below, total loans and leases equaled \$648.9 million, which consisted of \$562.2 million in

domestic real estate loans, \$39.1 million in commercial and industrial loans, and \$47.5 million in consumer loans.

LOAN PORTFOLIO SUMMARY		
Loan Type	Dollar Amount* ('000s)	Percent of Total
Commercial & Industrial	\$39,121	6.0%
Nonfarm Nonresidential Real Estate	\$145,221	22.4%
Construction & Land Development	\$5,881	1.0%
Secured by 1-4 Family Residential Real Estate	\$344,639	53.1%
Multifamily	\$66,474	10.2%
Consumer	\$47,505	7.3%
Other	\$29	0.0%
Total	\$648,870	100%

Fieldpoint maintains two assessment areas located in the State of New York and the State of Connecticut, consisting of the following:

- MD 35614 (New York-Jersey City-White Plains, NY-NJ), consisting of all of New York County.
- MSA 14860 (Bridgeport-Stamford-Norwalk, CT), consisting of portions of Fairfield County.

Although the majority of the bank’s deposit and lending activities occurred in MSA 14860 (Bridgeport-Stamford-Norwalk, CT), both assessment areas were evaluated using full-scope procedures. This was because MD 35614 (New York-Jersey City-White Plains, NY-NJ) contains a majority of the total census tracts located in the bank’s assessment areas, the branch presence of the bank is equal for both assessment areas, and it is Fieldpoint’s first CRA evaluation under the supervisory authority of the Federal Reserve Bank of New York.

The previous CRA evaluation of Fieldpoint was conducted as of March 31, 2014 by the Office of the Comptroller of the Currency (“OCC”). Home mortgage and CRA loan data was reviewed from January 1, 2012 to December 31, 2013, and community development activities were reviewed from April 4, 2011 to March 31, 2014. The OCC evaluated Fieldpoint as an intermediate small bank and rated the bank’s performance as satisfactory. There are no financial or legal factors that would prevent Fieldpoint from fulfilling its obligations under the CRA.

For additional details, see the Summary of Key Assessment Area Data on the following page, which contains a summary of assessment area data for all rated areas. Maps illustrating the bank’s assessment areas at the time of the evaluation are located in Appendix C.

Summary of Key Assessment Area Data			
	MD 35614 (New York-Jersey City- White Plains, NY-NJ)	MSA 14860 (Bridgeport-Stamford- Norwalk, CT)	Totals
Total Population ⁴	1,585,873	364,519	1,950,392
Population % of AA population	81.3%	18.7%	18.7%
Families ⁴	300,147	93,066	393,213
Families % of AA families	76.3%	23.7%	100.0%
Total Census Tracts ⁴	288	84	372
Tracts % AA tracts	77.4%	22.6%	100.0%
LMI tracts ⁴	105	20	125
LMI tracts % all AA LMI tracts	84.0%	16.0%	100.0%
Total Owner-Occupied Units ⁴	167,031	93,912	260,943
Units % of AA units	64.0%	36.0%	100.0%
Business Establishments ⁵	132,235	31,968	164,203
Bus. est. % AA bus. est.	80.5%	19.5%	100.0%
Number of Branches ¹	1	1	2
Branches % all branches	50.0%	50.0%	100.0%
Branches in LMI tracts ¹	1	0	0
LMI branches % AA LMI branches	50.0%	0.0%	0.0%
Branch Deposits (\$'000s) ²	54,977	613,849	668,826
Deposits % AA deposits	8.2%	91.8%	100.0%
Deposit Market Share (%)/ Rank in Mkt.	0.00/83	1.28/14	
Home Purchase Originations ³	7	18	25
HP originations % AA orig.	28.0%	72.0%	100.0%
Refinance Originations ³	4	26	30
Refi orig. % AA orig.	13.3%	86.7%	100.0%
Home Improvement Originations ³	0	2	2
Home Improvement orig. % AA orig.	0.0%	100.0%	100.0%
Multifamily Originations ³	4	1	5
Multifamily orig. % AA orig.	80.0%	20.0%	100.0%
Combined Loan Totals	15	47	62
% of AA Orig. ⁽⁶⁾	24.2%	75.8%	100.0%
(1) Branch numbers are as of 12/31/2016. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/16. (3) Originations are loans reported under HMDA for 2014 through 2016. (4) Demographic information was obtained from the 2010 Census. (5) Business establishments' information was reported by D&B for 2016.			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Fieldpoint’s overall performance in meeting the credit needs of its assessment areas under the lending test is rated satisfactory. Fieldpoint’s loan-to-deposit ratio was reasonable given the bank’s size, financial condition, and assessment areas’ credit needs. A majority of loans and other lending-related activities were in the assessment areas. However, the borrower distribution reflected poor penetration among individuals of different income (including LMI) levels. The geographic distribution of loans reflected reasonable dispersion throughout the assessment areas.

LOAN-TO-DEPOSIT RATIO

Fieldpoint’s loan-to-deposit ratio was reasonable given the bank’s size, financial condition, and the credit needs of its assessment areas. Fieldpoint’s average loan-to-deposit ratio for the 12 quarters between January 1, 2014 and December 31, 2016 was 87.6% based on information contained in Fieldpoint’s Consolidated Report of Condition and Income. This ratio was comparable to the national peer average of 87.3% for similarly-sized banks, and lower compared to an average of 105.5% for four similarly-situated banks located in Fieldpoint’s assessment areas during the evaluation period.

LENDING IN ASSESSMENT AREAS

Fieldpoint originated a majority of loans and other lending-related activities in the assessment areas. As shown in the table below, during the evaluation period, overall 51.7% by number, and 50.8% by dollar amount, were originated in its assessment areas. Compared to the prior CRA evaluation, this is both a decrease in number and dollar volume, which reflected 67.6% by number and 72.2% by dollar volume. By number, for each loan category, Fieldpoint originated 50.0% of its home purchase loans, 100.0% of its home improvement loans, 54.5% of its refinancing loans, and 38.5% of its multifamily loans in its assessment areas. Overall, although these lending levels do support that lending activities are focused within the bank’s assessment areas, the continued decreasing trend could impact the bank’s CRA performance.

Lending Inside and Outside the Assessment Area

January 1, 2014 -- December 31, 2016

Loan Type	Inside				Outside				Total			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase - Conventional	25	50.0	\$43,047	54.2	25	50.0	\$36,365	45.8	50	100.0	\$79,412	100.0
Home Improvement	2	100.0	\$4,964	100.0	0	0.0	\$0	0.0	2	100.0	\$4,964	100.0
Refinancing	30	54.5	\$41,773	50.7	25	45.5	\$40,655	49.3	55	100.0	\$82,428	100.0
Multifamily Housing	5	38.5	\$9,564	33.4	8	61.5	\$19,049	66.6	13	100.0	\$28,613	100.0
Total HMDA related	62	51.7	\$99,348	50.8	58	48.3	\$96,069	49.2	120	100.0	\$195,417	100.0
TOTAL LOANS	62	51.7	\$99,348	50.8	58	48.3	\$96,069	49.2	120	100.0	\$195,417	100.0

BORROWER DISTRIBUTION OF LOANS

Fieldpoint's borrower distribution reflected poor penetration among individuals of different income (including LMI) levels. This rating was based solely upon borrower distribution in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area because the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area did not have enough volume to conduct a meaningful analysis.

GEOGRAPHIC DISTRIBUTION OF LOANS

Fieldpoint's geographic distribution of loans reflected reasonable dispersion throughout the assessment areas.

RESPONSE TO CRA COMPLAINTS

Fieldpoint received no complaints relating to the bank's CRA performance. Since the previous evaluation, there were no CRA-related complaints filed with the Federal Reserve Bank of New York.

COMMUNITY DEVELOPMENT TEST

Fieldpoint's performance under the community development test is rated satisfactory. Fieldpoint demonstrated overall adequate responsiveness to community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas. The community development test also considered the performance of local competitors and their responsiveness to community development needs.

COMMUNITY DEVELOPMENT LENDING

Fieldpoint originated a total of five community development loans, which equaled approximately \$6.1 million, which targeted revitalization and stabilization initiatives in LMI geographies within the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. At the prior CRA evaluation, Fieldpoint originated seven community development loans totaling \$14.8 million. Although this is similar by number, this represents a 58.6% decrease by dollar volume since the prior CRA evaluation.

QUALIFIED INVESTMENTS

As shown in the table on the following page, Fieldpoint made qualified investments during the evaluation period that totaled \$1,038.5 million. These qualified investments were distributed throughout the bank's assessment areas and broader statewide or regional areas. Of the total qualified investments, 33 investments, or 76.7%, were dedicated to the bank's assessment areas

or broader statewide or regional areas including the assessment areas. By dollar amount, \$1,024.4 million, or 98.6%, were dedicated to the bank’s assessment areas.

QUALIFIED INVESTMENTS										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total	
	#	(\$'000s)	#	(\$'000s)	#	(\$'000s)	#	(\$'000s)	#	(\$'000s)
Inside MD 35614 Assessment Area	0	\$0	7	\$15.5	1	\$460.0	0	\$0	8	\$475.5
MD 35614 – Broader Statewide/Regional Area (Including AA)	0	\$0	3	\$7.5	0	\$0	0	\$0	3	\$7.5
MD 35614 – Broader Statewide/Regional Area (Outside AA)	0	\$0	9	\$13.1	0	\$0	0	\$0	9	\$13.1
Inside MSA 14860 Assessment Area	0	\$0	19	\$35.9	1	\$500.0	1	\$5.0	21	\$540.9
MSA 14860 – Broader Statewide/Regional Area (Including AA)	0	\$0	1	\$0.5	0	\$0	0	\$0	1	\$0.5
MSA 14860 – Broader Statewide/Regional Area (Outside AA)	0	\$0	1	\$1.0	0	\$0	0	\$0	1	\$1.0
Total	0	\$0	40	\$73.5	2	\$960.0	1	\$5.0	43	\$1,038.5

Of these investments, 40 investments (93.0%), equaling \$73.5 thousand (7.1%), were for the purpose of community services for LMI individuals. Two investments (4.7%) equaling \$960 thousand (92.4%) were for the purpose of economic development of LMI geographies; and one investment (2.3%), equaling \$5,000 (0.5%), was for the purpose of revitalizing and stabilizing LMI geographies. At the prior CRA evaluation, Fieldpoint originated 22 qualified investments totaling \$536.3 thousand. This represents a 95.5% increase by number and a 93.6% increase by dollar volume since the prior CRA evaluation.

Credit needs identified from community contacts included affordable housing, financing for economic development projects, and community services that target financial literacy and financial expertise programs for various community development programs. Because Fieldpoint met the credit needs of its assessment areas by providing activities that met these needs, the bank was able to receive credit for extending community development loans, qualified investments, and community development services to broader statewide or regional areas outside of the assessment areas.

COMMUNITY DEVELOPMENT SERVICES

As shown in the table to the right, during the evaluation period, Fieldpoint provided a total of 28 community development services. Of these services, one service (3.6%) was for the purpose of providing technical expertise for an affordable housing agency for LMI individuals, 26 services (92.8%) were for the purpose of providing financial literacy and technical expertise for community service organizations for LMI individuals, and one service (3.6%) was for the purpose of providing instruction and guidance to an economic development organization that

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Affordable Housing	1
Community Services	26
Economic Development	1
Total	28

serves LMI geographies. At the prior CRA evaluation, Fieldpoint provided 10 community development services. This represents a 180% increase in the amount of community development services since the prior CRA evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices was identified as being inconsistent with helping to meet the community's credit needs.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ):
Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors supporting the satisfactory rating include:

- The geographic distribution of loans reflected reasonable dispersion throughout the assessment area; and
- The bank's community development performance demonstrated adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

SCOPE OF EXAMINATION

Examiners evaluation of Fieldpoint's activities in the multistate metropolitan area consisted of a full-scope review of MD 35614 (New York-Jersey City-White Plains, NY-NJ). Performance ratings for the multistate metropolitan area were based solely on performance in New York County located in MD 35614 (New York-Jersey City-White Plains, NY-NJ). HMDA loans were reviewed from January 1, 2014 to December 31, 2016, and were compared to the average of the aggregate for the three years during the evaluation period. HMDA loans include home purchase, refinancing, home improvement, and multifamily loans. Community development activities were reviewed from April 1, 2014 to December 31, 2017.

Because loan volumes were minimal for each of the HMDA-related product types and for each of the years during the evaluation period, HMDA-related lending was combined for all product types for all three years of the evaluation period in order to the conduct the analysis. Out of the 15 loans originated in New York County, only six loans had reported income. Because of the low volume of loans with reported income, a meaningful borrower distribution analysis could not be conducted.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)

As of December 31, 2016, Fieldpoint operated one branch in a moderate-income census tract in New York County, which represented 50.0% of Fieldpoint's total branch network. According to the Federal Deposit Insurance Company ("FDIC") Deposit Market Share Report, as of June 30,

2016, Fieldpoint maintained less than 1.0% of the market share, ranked 83rd out of 108 banks in deposit market share in the assessment area, and maintained a deposit base of \$55.0 million in New York County. Competition in this assessment area is aggressive as Fieldpoint shares the market with large, national banks, as well as regional and community banks. Fieldpoint's operations in New York County accounted for 8.2% of the bank's total deposits. HMDA lending in New York County included 15 loans during the evaluation period, which represented 24.2% of Fieldpoint's total HMDA lending.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's 2010 Census ("2010 Census"), the American Community Survey ("ACS"), FFIEC, the New York State Association of Realtors ("NYSAR"), the National Association of Realtors ("NAR"), the U.S. Department of Labor ("DOL"), and Dun & Bradstreet ("D&B").

Demographic Characteristics

According to the 2010 Census, demographics data reflected that the population of the assessment area was 1,585,873, which represented 81.3% of the population of the bank's total assessment area population. The 2010 Census reported there was a total of 288 census tracts in the assessment area, which represented 77.4% of the bank's total census tracts in its assessment areas. The 2010 Census reported there were 300,147 families in the assessment area, which represented 76.3% of the bank's total families in the assessment areas' population.

Income Characteristics

According to the 2010 Census, income data reflected that out of the 288 census tracts situated in the assessment area, 44 (15.3%) were designated as low-income and 61 (21.2%) were classified as moderate-income. Out of the 300,147 families in the assessment area, 27.9% were low-income, 12.6% were moderate-income, and 14.5% of families lived below the poverty level. The FFIEC calculated the estimated MFI in 2016 for MD 35614 to equal \$72,600.

Housing Characteristics

According to the 2010 Census, housing data reflected that the assessment area contained 839,013 housing units, of which approximately 167,031 or 19.9% were owner-occupied. Of the owner-occupied units in the assessment area, 2.1% of units were located in low-income census tracts, and 9.7% were located in moderate-income census tracts. The remaining housing in the assessment area consisted of rental housing at 67.4% and vacant housing stock at 12.7%. The high percentage of rental units limits opportunities for HMDA-related lending. The 2010 Census data estimated that the median age of housing stock in the assessment area was 61 years old.

Housing in the assessment area is generally expensive, and according to community contacts, affordable housing remains a constant need for New York County. According to NAR, as of December 2016, the median sales price of an existing single-family home in MD 35614 (New York-Jersey City-White Plains, NY-NJ) was \$370,200. This is approximately over 10 times the MFI of a low-income borrower and approximately 6.5 times the MFI of a moderate-income borrower. The affordability ratio in the assessment area is 7.8%, which signifies that housing is expensive in the assessment area. Rents are also expensive in the assessment area. The 2010 Census data valued median gross rent for the assessment area as \$1,233, which is higher compared to the median gross rent of \$977 for the State of New York.

Labor, Employment, and Economic Characteristics

The MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area is a global hub of international business and commerce. New York County is a major center for finance, insurance, real estate, and the arts in the United States. Many major corporations are headquartered in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area, including numerous Fortune 500 companies. According to D&B, as of 2016 there were 132,235 businesses operating in this assessment area, of which 5.2% were located in low-income areas, and 9.2% were located in moderate-income areas. Of the total businesses operating in the assessment area, 82.6% were businesses with gross annual revenues (“GAR”) of \$1 million or less.

As shown in the table to the right, the annual unemployment rate for MD 35614 (New York-Jersey City-White Plains, NY-NJ) demonstrated a decreasing trend from 2014 to 2016, with the unemployment rate at 6.8% in 2014 and 4.9% in 2016. The unemployment rate with the State of New York was proportionate with this trend, declining from 6.3% in 2014 to 4.8% in 2016.

AVERAGE ANNUAL UNEMPLOYMENT RATE			
Area	2014	2015	2016
MD 35614	6.8%	5.5%	4.9%
State of New York	6.3%	5.3%	4.8%

Community Contacts

In the New York County assessment area, information from community contacts supports the need for affordable housing and community services, especially programs that benefit the lowest-income New Yorkers. Community contacts noted they would specifically like to see banks fund affordable housing programs. Community contacts also expressed a need for more in-house portfolio lending because many borrowers do not fit typical government-backed loan programs. They also would like for banks to provide community services by offering their financial expertise to homeowners and renters, so that homeowners and renters have ongoing communication and comprehension regarding first-time home buying, eviction prevention, and mortgage foreclosure, home modification, and reverse mortgage counseling. Community contacts also expressed a need for support for charter schools, community healthcare, and micro-finance lending.

Additional performance context data for this assessment area is provided in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) Assessment Area Demographics table below.

Assessment Area Demographics - 2016
Assessment Area: MD 35614 (New York-Jersey City-White Plains, NY-NJ)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	44	15.3	59,032	19.7	20,173	34.2	83,798	27.9
Moderate-income	61	21.2	71,841	23.9	15,503	21.6	37,797	12.6
Middle-income	25	8.7	21,069	7.0	2,640	12.5	34,085	11.4
Upper-income	146	50.7	148,187	49.4	5,081	3.4	144,467	48.1
Unknown-income	12	4.2	18	0.0	0	0.0	0	0.0
Total Assessment Area	288	100.0	300,147	100.0	43,397	14.5	300,147	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	105,101	3,574	2.1	3.4	94,299	89.7	7,228	6.9
Moderate-income	160,160	16,160	9.7	10.1	128,315	80.1	15,685	9.8
Middle-income	66,413	10,610	6.4	16.0	48,757	73.4	7,046	10.6
Upper-income	507,092	136,673	81.8	27.0	293,630	57.9	76,789	15.1
Unknown-income	247	14	0.0	5.7	172	69.6	61	24.7
Total Assessment Area	839,013	167,031	100.0	19.9	565,173	67.4	106,809	12.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6,940	5.2	6,196	5.7	711	3.2	33	3.7
Moderate-income	12,227	9.2	10,672	9.8	1,492	6.7	63	7.1
Middle-income	8,547	6.5	7,129	6.5	1,381	6.2	37	4.2
Upper-income	95,438	72.2	78,526	71.9	16,217	73.2	695	78.1
Unknown-income	9,083	6.9	6,662	6.1	2,359	10.6	62	7.0
Total Assessment Area	132,235	100.0	109,185	100.0	22,160	100.0	890	100.0
	Percentage of Total Businesses:			82.6		16.8		.7

2016 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)

LENDING TEST

Borrower Distribution of Loans

Because loan volumes were minimal for each of the HMDA-related product types and for each of the years during the evaluation period, HMDA-related lending was combined for all product types for all three years of the evaluation period in order to conduct the analysis. Out of the 15 loans originated in New York County, only six loans had reported income. Because of the low volume of loans with reported income, a meaningful analysis could not be conducted.

Geographic Distribution of Loans

Fieldpoint's geographic distribution of loans reflected reasonable dispersion throughout the assessment area. This was based on reasonable performance in both low- and moderate-income census tracts. Because loan volumes were minimal for each of the HMDA-related product types and for each of the years during the evaluation period, HMDA-related lending was combined for all product types for all three years of the evaluation period in order to conduct the analysis. All product types were given equal weight for the analysis. Fieldpoint's HMDA-related lending was compared to the average of the aggregate for the three years during the evaluation period and 2010 Census demographics data.

Given the overall low volume of HMDA-related originations, Fieldpoint demonstrated a high level of lending gaps in low- and moderate-income geographies. Fieldpoint did not originate loans in a substantial majority of the census tracts within the assessment area. Gaps in penetration for HMDA-related originations were reflected in geographies of all income levels. As shown in the table on the next page, Fieldpoint penetrated 4.3% of the census tract income levels inside its assessment area. During the evaluation period, Fieldpoint originated loans in one of 44 (2.3%) low-income census tracts, and two of 61 (3.3%) moderate-income census tracts. According to the 2010 Census, 19.7% of families resided in low-income census tracts and 12.5% of housing units were in low-income census tracts. The 2010 Census reflected that 23.9% of families resided in moderate-income census tracts and 19.1% of housing units were in moderate-income census tracts. The owner-occupancy rate for low-income census tracts was 3.4% and 10.1% for moderate-income census tracts. The table on the next page details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

TRACT INCOME LEVELS	NUMBER OF TRACTS	TRACTS WITH NO LOANS	PENETRATION
2014 – 2016			
Low	44	43	2.3%
Moderate	61	59	3.3%
Middle	25	25	0.0%
Upper	146	137	6.2%
Total	276	264	4.3%

Fieldpoint’s geographic distribution of loans reflected reasonable dispersion throughout low-income geographies. All of the originations occurred in 2014 and 2015, as Fieldpoint did not originate any loans in this assessment area in 2016. During the evaluation period, Fieldpoint originated 6.7% of loans in low-income census tracts. Although this was above the aggregate’s average performance of 3.1% by number and 4.2% by dollar volume, Fieldpoint originated only one of 15 loans in low-income census tracts. Opportunities to originate HMDA loans in low-income census tracts was limited, as only 2.1% of the assessment area’s owner-occupied housing was situated in a low-income census tract. Furthermore, 34.2% of families living in low-income census tracts were below the poverty level, which created challenges to banks in lending in low-income census tracts.

Fieldpoint’s geographic distribution of loans reflects reasonable dispersion throughout moderate-income geographies. During the evaluation period, Fieldpoint originated four of 15 loans, which equaled 26.7% of loans by number in moderate-income census tracts. This was above the aggregate’s average performance, which equaled 9.7% by number and 9.1% by dollar volume. This was also above the 9.7% of owner-occupied units located in moderate-income census tracts.

COMMUNITY DEVELOPMENT TEST

Fieldpoint’s performance under the community development test is rated satisfactory. Fieldpoint demonstrated adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area. The community development test also considered the performance of local competitors and their responsiveness to community development needs.

During the evaluation period, Fieldpoint made a total of \$6.1 million in community development loans and \$483.0 thousand in qualified investments in this assessment area and the broader statewide or regional area that included this assessment area. This equals 100.0% of total community development loans and 46.5% of total qualified investments. Fieldpoint’s community development loans and qualified investments were responsive to the bank’s MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area.

Community Development Lending

During the evaluation period, Fieldpoint originated five community development loans that totaled \$6.1 million. Although all of Fieldpoint’s community development loans in MD 35614 (New York-Jersey City-White Plains, NY-NJ) were for the purpose of revitalizing and stabilizing LMI geographies, a few of the loans were collateralized by mixed-use property that included residential units located in moderate-income census tracts.

Examples of community development lending include:

- Two loans totaling \$3.125 million to renovate and convert a multifamily building located in a moderate-income census tract into student housing; and
- A \$1.5 million loan to renovate and convert a commercial property located in a moderate-income census tract into commercial and residential condominiums.

Qualified Investments

As shown in the table to the right, during the evaluation period, Fieldpoint extended 11 qualified investments that totaled \$483.0 thousand. Of these investments, 10 (90.9%), equaling \$23.0 thousand (4.8%), were for the purpose of community services to LMI individuals, and one investment (9.1%), equaling \$460 thousand (95.2%), was for the purpose of economic development of LMI geographies. All qualified investments dedicated to community services were for philanthropic grants, while Fieldpoint made one qualified investment designated as economic development.

QUALIFIED INVESTMENTS		
Purpose	#	\$('000s)
Community Services	10	\$23.0
Economic Development	1	\$460.0
Total	11	\$483.0

Examples of qualified investments include:

- One investment for \$460 thousand into a fund that invests in community development loans guaranteed by the Small Business Administration (“SBA”); and
- Three grants totaling \$8,500 to an organization that provides educational services targeting LMI and underserved communities in the assessment area.

Community Development Services

As shown in the table to the right, during the evaluation period, Fieldpoint provided 19 community development services. Of these services, one (5.3%) was for the purpose of providing technical expertise for an organization that supports affordable housing for LMI individuals, and 18 (94.7%) were for the purpose of providing a variety of services, including financial literacy and technical assistance, to organizations that provide community services to LMI individuals.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Affordable Housing	1
Community Services	18
Total	19

Examples of community development services include:

- One employee provided over 40 hours of service as a financial education instructor for a tutoring company that targets LMI and underserved communities in New York; and
- One employee provided 24 hours a year as a board member of a foundation that financially supports the spiritual, educational, and social needs of LMI communities. The employee provided technical expertise by assisting with the foundation's finances and endowments.

STATE OF CONNECTICUT

CRA RATING FOR THE STATE OF CONNECTICUT: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors supporting the rating include:

- Poor penetration among individuals of different income (including LMI) levels;
- The geographic distribution of loans reflected reasonable dispersion throughout the assessment area; and
- The bank's community development performance demonstrated adequate responsiveness to community development needs of its assessment area through qualified investments and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

SCOPE OF EXAMINATION

Examiners evaluation of Fieldpoint's activities in the State of Connecticut consisted of a full-scope review of MSA 14860 (Bridgeport-Stamford-Norwalk, CT), which is comprised of Fairfield County. Performance ratings for the State of Connecticut were based solely on Fieldpoint's performance in a portion of Fairfield County. HMDA loans were reviewed from January 1, 2014 to December 31, 2016, and were compared to the average of the aggregate for the three years during the evaluation period. HMDA loans include home purchase, refinancing, home improvement, and multifamily dwelling loans. Community development activities were reviewed from April 1, 2014 to December 31, 2017.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF CONNECTICUT

As mentioned above, the assessment area in the State of Connecticut solely includes a portion of Fairfield County, which is located in MSA 14860 (Bridgeport-Stamford-Norwalk, CT). Further discussion of Fieldpoint's operations will be included in the Description of Institution's Operations in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) section on the following page.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF CONNECTICUT

Conclusions regarding Fieldpoint's performance in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) with respect to the lending test and community development test were based solely on performance in portions of Fairfield County. Fieldpoint's borrower distribution reflected poor penetration among individuals of different income levels. Fieldpoint's geographic distribution of loans reflected reasonable dispersion throughout the assessment area. Fieldpoint's community development performance demonstrated adequate responsiveness to community development needs of its assessment area through qualified investments and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)

As of December 31, 2016, Fieldpoint operated one branch in a middle-income census tract in Fairfield County, which represented 50.0% of Fieldpoint's total branch network. According to the FDIC Deposit Market Share Report, as of June 30, 2016, Fieldpoint maintained 1.3% of the market share, ranked 14th out of 29 banks in deposit market share in the assessment area, and maintained a deposit base of \$613.8 million in Fairfield County. Fieldpoint also faces aggressive competition as national, regional, and community banks also maintain a market presence in this assessment area. Fieldpoint's operations in Fairfield County had 91.8% of the bank's total deposits. HMDA-related lending in Fairfield County included 47 loans during the evaluation period, which represented 75.8% of Fieldpoint's total HMDA lending volume.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's 2010 Census ("2010 Census"), the American Community Survey ("ACS"), FFIEC, the Connecticut Association of Realtors ("CAR"), the National Association of Realtors ("NAR"), the U.S. Department of Labor ("DOL"), and Dun & Bradstreet ("D&B").

Demographic Characteristics

According to the 2010 Census, demographic data reflected that the population of the assessment area was 364,519, which represented 18.7% of the population of the bank's entire assessment area population. The 2010 Census reported there was a total of 84 census tracts in the assessment area, which represented 22.6% of the bank's total census tracts in its assessment areas. The 2010 Census reported there were 93,066 families in the assessment area, which represented 23.7% of the bank's total families in the assessment area population.

Income Characteristics

According to the 2010 Census, demographic data reflected that out of the 84 census tracts situated in the assessment area, 6 (7.1%) were designated as low-income and 14 (16.7%) were classified as moderate-income. Out of the 93,066 families in the assessment area, 18.8% were low-income, 13.9% were moderate-income, and 4.6% of families lived below the poverty level. The FFIEC calculated the estimated MFI in 2016 for MSA 14860 (Bridgeport-Stamford-Norwalk, CT) to equal \$104,400.

Housing Characteristics

According to the 2010 Census, housing data reflected that the assessment area contained 145,805 housing units, of which approximately 64.4% are owner-occupied. Of the owner-occupied units in the assessment area, 2.6% of units were located in low-income census tracts, and 12.9% were located in moderate-income census tracts. The remaining housing in the assessment area consisted of rental housing at 28.9% and vacant housing stock at 6.7%. The 2010 Census data estimated that the median age of housing stock in this assessment area was 49 years old.

Housing in the assessment area is expensive, and according to community contacts, affordable housing remains a constant need for the locality. According to NAR, as of December 2016, the median sales price of an existing single-family home in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) was \$373,500. This is over seven times the MFI of a low-income borrower and approximately 4.5 times more than the MFI of a moderate-income borrower. The affordability ratio in the assessment area is 13.0%, which signifies that housing is generally expensive in the assessment area. Rents are relatively expensive in the assessment area. The 2010 Census data valued median gross rent for the assessment area as \$1,416, which is higher compared to the median gross rent of \$982 for the State of Connecticut.

Labor, Employment, and Economic Characteristics

The major industries surrounding Fieldpoint are: healthcare and social assistance, retail trade, and professional, scientific, and tech services. According to D&B, as of 2016 there were 31,968 businesses operating in this assessment area, of which 6.0% were located in low-income areas, and 15.4% were located in moderate-income areas. Of the total businesses operating in the assessment area, 89.7% were businesses with GAR of \$1 million or less.

As shown in the table to the right, the annual unemployment rate for MSA 14860 (Bridgeport-Stamford-Norwalk, CT) demonstrated a decreasing trend from 2014 to 2016, with the unemployment rate at 6.2% in 2014 and 4.8% in 2016. The unemployment rate with the State of Connecticut was commensurate with this trend, declining from 6.6% in 2014 to 5.1% in 2016.

AVERAGE ANNUAL UNEMPLOYMENT RATE			
Area	2014	2015	2016
MSA 14860	6.2%	5.4%	4.8%
State of Connecticut	6.6%	5.7%	5.1%

Community Contacts

In the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area, one community contact was conducted with an economic development organization that serves a town located in Fairfield County. The contact indicated that there is a need for affordable housing and social services, like food, heating, and medical services. There is also a need for multiple-layer financing that involves private investors, as well as support from banks, in order to finance projects.

Additional performance context data for this assessment area is provided in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area Demographics table on the following page.

Assessment Area Demographics – 2016
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	7.1	5,329	5.7	1,119	21.0	17,474	18.8	
Moderate-income	14	16.7	16,025	17.2	1,689	10.5	12,981	13.9	
Middle-income	23	27.4	25,772	27.7	803	3.1	16,308	17.5	
Upper-income	41	48.8	45,940	49.4	695	1.5	46,303	49.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	84	100.0	93,066	100.0	4,306	4.6	93,066	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	9,821	2,429	2.6	24.7	6,585	67.1	807	8.2	
Moderate-income	30,990	12,130	12.9	39.1	16,635	53.7	2,225	7.2	
Middle-income	43,190	28,955	30.8	67.0	11,712	27.1	2,523	5.8	
Upper-income	61,804	50,398	53.7	81.5	7,214	11.7	4,192	6.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	145,805	93,912	100.0	64.4	42,146	28.9	9,747	6.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	1,910	6.0	1,575	5.5	322	10.8	13	4.3	
Moderate-income	4,927	15.4	4,258	14.8	643	21.5	26	8.6	
Middle-income	7,817	24.5	7,064	24.6	707	23.7	46	15.2	
Upper-income	17,314	54.2	15,782	55.0	1,315	44.0	217	71.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	31,968	100.0	28,679	100.0	2,987	100.0	302	100.0	
Percentage of Total Businesses:				89.7		9.3		.9	

2016 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)

LENDING TEST

Borrower Distribution of Loans

Fieldpoint's borrower distribution reflected poor penetration among individuals of different income (including LMI) levels. This was based on very poor performance to low-income borrowers, and poor performance to moderate-income borrowers. Out of the 47 loans originated in MSA 14860 (Bridgeport-Stamford-Norwalk, CT), 31 loans had reported income. Because loan volumes were minimal for each of the HMDA-related product types and for each of the years during the evaluation period, HMDA-related lending was combined for all product types for all three years of the evaluation period in order to conduct the analysis. All product types were given equal weight for the analysis. Fieldpoint's HMDA-related lending was compared to the average of the aggregate for the three years during the evaluation period and 2010 Census demographic data.

Fieldpoint's borrower distribution reflected very poor penetration to low-income borrowers. During the evaluation period, Fieldpoint did not originate any loans to low-income borrowers. This was below the aggregate's average performance, which equaled 3.1% by number and 0.6% by dollar volume. This was also below the 18.8% of low-income families living in the assessment area.

Fieldpoint's borrower distribution reflected poor penetration to moderate-income borrowers. During the evaluation period, Fieldpoint originated 3.2% of loans (which equaled one of 31 loans) with reported income by number and 2.1% by dollar volume to moderate-income borrowers. This was below the aggregate's average performance, which equaled 9.4% by number and 3.3% by dollar volume. This was also below the 13.9% of moderate-income families living in the assessment area.

Geographic Distribution of Loans

Fieldpoint's geographic distribution of loans reflected reasonable dispersion throughout the assessment area. This was based on reasonable performance in both low- and moderate-income census tracts. Because loan volumes were minimal for each of the HMDA-related product types and for each of the years during the evaluation period, HMDA-related lending was combined for all product types for all three years of the evaluation period in order to conduct the analysis. All product types were given equal weight for the analysis. Fieldpoint's HMDA-related lending was compared to the average of the aggregate for the three years during the evaluation period and 2010 Census demographic data.

Fieldpoint demonstrated a moderate level of lending gaps in low- and moderate-income geographies. Fieldpoint did not originate loans in a majority of the census tracts within the assessment area across all income levels. As shown in the table below, Fieldpoint penetrated 28.6% of the census tract income levels inside its assessment area. During the evaluation period, Fieldpoint originated loans in two of six (33.3%) low-income census tracts, and five of 14 (35.7%) moderate-income census tracts. According to the 2010 Census, 5.7% of families resided in low-income census tracts and 6.7% of housing units were in low-income census tracts. The 2010 Census reflects that 17.2% of families resided in moderate-income census tracts and 21.3% of housing units were in moderate-income census tracts. The owner-occupancy rate for low-income census tracts was 2.6% and 12.9% for moderate-income census tracts. The table below details the bank’s penetration of low-, moderate-, middle-, and upper-income census tracts.

TRACT INCOME LEVELS	NUMBER OF TRACTS	TRACTS WITH NO LOANS	PENETRATION
2014 – 2016			
Low	6	4	33.3%
Moderate	14	9	35.7%
Middle	23	20	13.0%
Upper	41	27	34.1%
Total	84	60	28.6%

Fieldpoint’s geographic distribution of loans reflected reasonable dispersion throughout low-income geographies. During the evaluation period, Fieldpoint originated two of 47 loans (4.3%) in low-income census tracts. This was above the aggregate’s average performance, which equaled 2.1% by number and 1.9% by dollar volume. Opportunities to originate HMDA loans in low-income census tracts were limited, as only 2.6% of the assessment area’s owner-occupied housing was situated in a low-income census tract. Furthermore, 21.0% of families living in low-income census tracts were below the poverty level, which created challenges to banks in lending in low-income census tracts.

Fieldpoint’s geographic distribution of loans reflects reasonable dispersion throughout moderate-income geographies. During the evaluation period, Fieldpoint originated 10 of 47 loans (21.3%) in moderate-income census tracts. This was above the aggregate’s average performance, which equaled 12.6% by number and 7.4% by dollar volume. This was also above the 12.9% of owner-occupied units located in moderate-income census tracts.

COMMUNITY DEVELOPMENT TEST

Fieldpoint’s performance under the community development test is rated satisfactory. Fieldpoint demonstrated adequate responsiveness to community development needs of its assessment area through qualified investments and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area. The community development test also considered the performance of local competitors and their responsiveness to community development needs.

During the evaluation period, Fieldpoint made a total of \$541.4 thousand in qualified investments and philanthropic grants in this assessment area and the broader statewide or regional area that included this assessment area. This equals 52.1% of total qualified investments. Consideration was also given to Fieldpoint’s qualified investments outside the assessment area, as activity within the area was responsive to the needs in the assessment area.

Qualified Investments

As shown in the table to the right, during the evaluation period, Fieldpoint extended 22 qualified investments that totaled \$541.4 thousand. Of these investments, 20 (90.9%), equaling \$36.4 thousand (6.7%), were for the purpose of community services to LMI individuals. One investment (4.5%), equaling \$500,000 thousand (92.4%), was for the purpose of economic development of LMI geographies, and one investment (4.5%) equaling \$5,000 (0.9%) was for the purpose of revitalizing and stabilizing LMI geographies. All qualified investments dedicated to community services and revitalization and stabilization were philanthropic grants, while the qualified investment was designated as economic development.

QUALIFIED INVESTMENTS		
Purpose	#	\$('000s)
Community Services	20	\$36.4
Economic Development	1	\$500.0
Revitalize and Stabilize	1	\$5.0
Total	22	\$541.4

Examples of qualified investments include:

- One investment for \$500 thousand into a fund that invests in community development loans guaranteed by the SBA; and
- Four grants totaling \$10,000 to a school that provides a subsidized private education and youth services for children from LMI families in the community.

Community Development Services

As shown in the table to the right, during the evaluation period, Fieldpoint provided nine community development services. Of these services, eight (88.9%) was for the purpose of supplying financial literacy and technical assistance to organizations that provide community services for LMI individuals, and one (11.1%) was for the purpose of providing technical assistance and leadership to an organization that provides economic development in LMI geographies.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Community Services	8
Economic Development	1
Total	9

Examples of community development services include:

- Three employees acted as financial advisors for an organization that helps break the cycle of homelessness by helping people achieve and maintain permanent housing and stability in their lives; and
- One employee provided 48 hours a year as a board member for a foundation that addresses the impact of aging on families, which includes enabling LMI individuals to work.

CRA APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		Lending Test: January 1, 2014 – December 31, 2016 Community Development Test: April 1, 2014 – December 31, 2017	
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Fieldpoint Private Bank & Trust 100 Field Point Road Greenwich, CT 06830			Home purchase Refinancing Home improvement Multifamily
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None	None		None
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
New York MD 35614 (New York, Jersey City, White Plains, NY-NJ)	Full-scope review	None	
Connecticut MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	Full-scope review	100 Field Pont Road Greenwich, CT 06830	

CRA APPENDIX B

2016 Aggregate Comparison Loan Distribution Table
Assessment Area: MD 35614 (New York-Jersey City-White Plains, NY-NJ)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	%	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	3.6%	2.2%	0	0.0%	0.0%	0.1%	0.0%
Moderate	0	0.0%	0.0%	8.5%	5.7%	0	0.0%	0.0%	1.2%	0.2%
Middle	0	0.0%	0.0%	7.2%	5.0%	0	0.0%	0.0%	6.2%	1.6%
Upper	0	0.0%	0.0%	80.6%	86.9%	0	0.0%	0.0%	84.2%	79.1%
Unknown	0	0.0%	0.0%	0.2%	0.2%	0	0.0%	0.0%	8.4%	19.1%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	2.3%	1.5%	0	0.0%	0.0%	0.4%	0.1%
Moderate	0	0.0%	0.0%	8.4%	4.3%	0	0.0%	0.0%	1.3%	0.3%
Middle	0	0.0%	0.0%	6.4%	4.0%	0	0.0%	0.0%	5.5%	1.5%
Upper	0	0.0%	0.0%	82.7%	89.7%	0	0.0%	0.0%	85.2%	86.3%
Unknown	0	0.0%	0.0%	0.1%	0.6%	0	0.0%	0.0%	7.7%	11.8%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	2.5%	1.5%	0	0.0%	0.0%	1.6%	0.0%
Moderate	0	0.0%	0.0%	10.3%	7.0%	0	0.0%	0.0%	1.6%	0.1%
Middle	0	0.0%	0.0%	6.2%	4.4%	0	0.0%	0.0%	4.5%	1.4%
Upper	0	0.0%	0.0%	81.1%	87.1%	0	0.0%	0.0%	84.6%	85.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.6%	13.3%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	11.2%	9.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.6%	20.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	7.9%	7.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	55.3%	61.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	0	0.0%	0.0%	3.5%	4.2%	0	0.0%	0.0%	0.3%	0.1%
Moderate	0	0.0%	0.0%	9.4%	9.8%	0	0.0%	0.0%	1.2%	0.2%
Middle	0	0.0%	0.0%	6.9%	5.6%	0	0.0%	0.0%	5.5%	1.1%
Upper	0	0.0%	0.0%	80.1%	80.2%	0	0.0%	0.0%	80.1%	57.5%
Unknown	0	0.0%	0.0%	0.1%	0.2%	0	0.0%	0.0%	13.0%	41.2%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table
Assessment Area: MD 35614 (New York-Jersey City-White Plains, NY-NJ)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	%	% \$(000s)	#	Bank %	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	1	16.7%	4.2%	2.2%	1.6%	0	0.0%	0.0%	0.2%	0.1%
Moderate	0	0.0%	0.0%	9.1%	6.0%	0	0.0%	0.0%	1.4%	0.3%
Middle	0	0.0%	0.0%	8.5%	5.6%	0	0.0%	0.0%	6.0%	1.6%
Upper	5	83.3%	95.8%	80.1%	86.6%	4	66.7%	52.6%	83.3%	80.6%
Unknown	0	0.0%	0.0%	0.1%	0.2%	2	33.3%	47.4%	9.1%	17.5%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	2.0%	1.3%	0	0.0%	0.0%	0.5%	0.2%
Moderate	1	100.0%	100.0%	7.7%	4.3%	0	0.0%	0.0%	1.8%	0.4%
Middle	0	0.0%	0.0%	5.6%	3.3%	0	0.0%	0.0%	5.0%	1.5%
Upper	0	0.0%	0.0%	84.6%	90.9%	0	0.0%	0.0%	83.7%	87.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	1	100.0%	100.0%	9.0%	10.5%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	4.8%	1.4%	0	0.0%	0.0%	0.8%	0.0%
Moderate	0	0.0%	0.0%	10.0%	14.8%	0	0.0%	0.0%	5.2%	0.2%
Middle	0	0.0%	0.0%	5.8%	2.1%	0	0.0%	0.0%	5.6%	0.6%
Upper	0	0.0%	0.0%	78.9%	81.0%	0	0.0%	0.0%	73.9%	49.9%
Unknown	0	0.0%	0.0%	0.4%	0.7%	0	0.0%	0.0%	14.4%	49.3%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	10.8%	9.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	75.0%	45.9%	19.9%	16.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	7.2%	5.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	25.0%	54.1%	62.1%	68.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	1	9.1%	2.6%	2.7%	3.8%	0	0.0%	0.0%	0.3%	0.1%
Moderate	4	36.4%	21.0%	9.3%	8.7%	0	0.0%	0.0%	1.6%	0.2%
Middle	0	0.0%	0.0%	7.4%	5.0%	0	0.0%	0.0%	5.3%	1.1%
Upper	6	54.5%	76.4%	80.5%	82.4%	4	36.4%	32.1%	78.2%	59.1%
Unknown	0	0.0%	0.0%	0.1%	0.1%	7	63.6%	67.9%	14.6%	39.5%
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table
Assessment Area: MD 35614 (New York-Jersey City-White Plains, NY-NJ)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.6%	1.7%	0	0.0%	0.0%	0.1%	0.0%
Moderate	0	0.0%	0.0%	10.2%	5.7%	0	0.0%	0.0%	1.3%	0.3%
Middle	0	0.0%	0.0%	7.4%	5.6%	0	0.0%	0.0%	6.5%	1.9%
Upper	1	100.0%	100.0%	79.7%	86.4%	1	100.0%	100.0%	81.6%	80.1%
Unknown	0	0.0%	0.0%	0.2%	0.6%	0	0.0%	0.0%	10.5%	17.8%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	2.2%	1.6%	0	0.0%	0.0%	1.1%	0.4%
Moderate	0	0.0%	0.0%	8.0%	5.0%	0	0.0%	0.0%	2.1%	0.5%
Middle	0	0.0%	0.0%	6.5%	3.7%	0	0.0%	0.0%	5.3%	1.6%
Upper	3	100.0%	100.0%	82.8%	89.2%	1	33.3%	42.2%	81.8%	84.5%
Unknown	0	0.0%	0.0%	0.4%	0.5%	2	66.7%	57.8%	9.6%	13.1%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	4.2%	1.1%	0	0.0%	0.0%	0.6%	0.0%
Moderate	0	0.0%	0.0%	17.3%	5.7%	0	0.0%	0.0%	3.1%	0.1%
Middle	0	0.0%	0.0%	4.2%	1.4%	0	0.0%	0.0%	5.3%	0.7%
Upper	0	0.0%	0.0%	74.1%	91.5%	0	0.0%	0.0%	69.6%	49.0%
Unknown	0	0.0%	0.0%	0.3%	0.3%	0	0.0%	0.0%	21.4%	50.1%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	11.3%	10.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.6%	15.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	8.1%	10.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	59.2%	63.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.7%	0.5%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	3.1%	4.5%	0	0.0%	0.0%	0.4%	0.1%
Moderate	0	0.0%	0.0%	10.5%	8.7%	0	0.0%	0.0%	1.5%	0.2%
Middle	0	0.0%	0.0%	7.1%	6.9%	0	0.0%	0.0%	5.7%	1.2%
Upper	4	100.0%	100.0%	79.0%	79.4%	2	50.0%	54.0%	76.0%	53.6%
Unknown	0	0.0%	0.0%	0.3%	0.5%	2	50.0%	46.0%	16.4%	45.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	2.4%	1.0%	0	0.0%	0.0%	3.2%	0.9%
Moderate	0	0.0%	0.0%	15.8%	7.5%	0	0.0%	0.0%	11.5%	4.6%
Middle	0	0.0%	0.0%	31.8%	18.9%	0	0.0%	0.0%	16.3%	9.0%
Upper	4	100.0%	100.0%	49.9%	72.7%	4	100.0%	100.0%	59.7%	75.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.3%	9.7%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	1.4%	0.6%	0	0.0%	0.0%	2.5%	0.8%
Moderate	2	18.2%	5.0%	9.2%	3.7%	0	0.0%	0.0%	7.3%	2.5%
Middle	2	18.2%	6.2%	26.5%	13.7%	0	0.0%	0.0%	13.5%	6.2%
Upper	7	63.6%	88.8%	62.9%	82.0%	7	63.6%	88.8%	66.9%	78.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	36.4%	11.2%	9.9%	11.6%
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	2.2%	0.7%	0	0.0%	0.0%	3.4%	1.4%
Moderate	0	0.0%	0.0%	8.0%	2.2%	0	0.0%	0.0%	5.8%	1.6%
Middle	0	0.0%	0.0%	21.3%	8.4%	0	0.0%	0.0%	13.8%	5.0%
Upper	1	100.0%	100.0%	68.5%	88.8%	0	0.0%	0.0%	71.8%	84.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	5.2%	7.2%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	14.9%	28.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	31.9%	28.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	29.8%	33.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	23.4%	10.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	0	0.0%	0.0%	1.9%	1.9%	0	0.0%	0.0%	2.8%	0.8%
Moderate	2	11.8%	2.6%	12.1%	6.1%	0	0.0%	0.0%	9.0%	3.2%
Middle	2	11.8%	3.2%	28.6%	16.3%	0	0.0%	0.0%	14.6%	7.0%
Upper	13	76.5%	94.2%	57.4%	75.7%	11	64.7%	70.6%	63.7%	74.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	35.3%	29.4%	9.8%	14.1%
<i>Total</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>17</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)
Home Purchase										
Low	1	20.0%	1.8%	2.3%	0.9%	0	0.0%	0.0%	2.9%	0.7%
Moderate	0	0.0%	0.0%	14.3%	6.4%	1	20.0%	1.8%	10.8%	4.3%
Middle	1	20.0%	7.0%	31.1%	17.2%	0	0.0%	0.0%	14.9%	7.4%
Upper	3	60.0%	91.1%	52.3%	75.5%	3	60.0%	59.1%	59.3%	75.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	39.1%	12.1%	12.4%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	1.6%	0.6%	0	0.0%	0.0%	3.1%	1.0%
Moderate	3	30.0%	5.5%	10.7%	4.5%	0	0.0%	0.0%	7.2%	2.6%
Middle	0	0.0%	0.0%	26.4%	15.3%	0	0.0%	0.0%	12.7%	6.2%
Upper	7	70.0%	94.5%	61.4%	79.6%	5	50.0%	60.9%	63.7%	77.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	50.0%	39.1%	13.2%	13.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	0.9%	0.1%	0	0.0%	0.0%	1.9%	0.2%
Moderate	0	0.0%	0.0%	7.8%	2.8%	0	0.0%	0.0%	6.5%	1.5%
Middle	0	0.0%	0.0%	19.0%	8.2%	0	0.0%	0.0%	16.2%	6.2%
Upper	0	0.0%	0.0%	72.3%	89.0%	0	0.0%	0.0%	69.9%	82.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.4%	9.7%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	28.3%	25.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	43.5%	48.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	15.2%	6.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.0%	18.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	1	6.7%	0.8%	2.0%	2.1%	0	0.0%	0.0%	3.0%	0.8%
Moderate	3	20.0%	3.3%	12.3%	7.7%	1	6.7%	0.8%	8.8%	3.2%
Middle	1	6.7%	2.9%	28.1%	15.4%	0	0.0%	0.0%	13.8%	6.4%
Upper	10	66.7%	93.1%	57.6%	74.8%	8	53.3%	60.2%	61.7%	72.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	40.0%	39.1%	12.7%	17.4%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

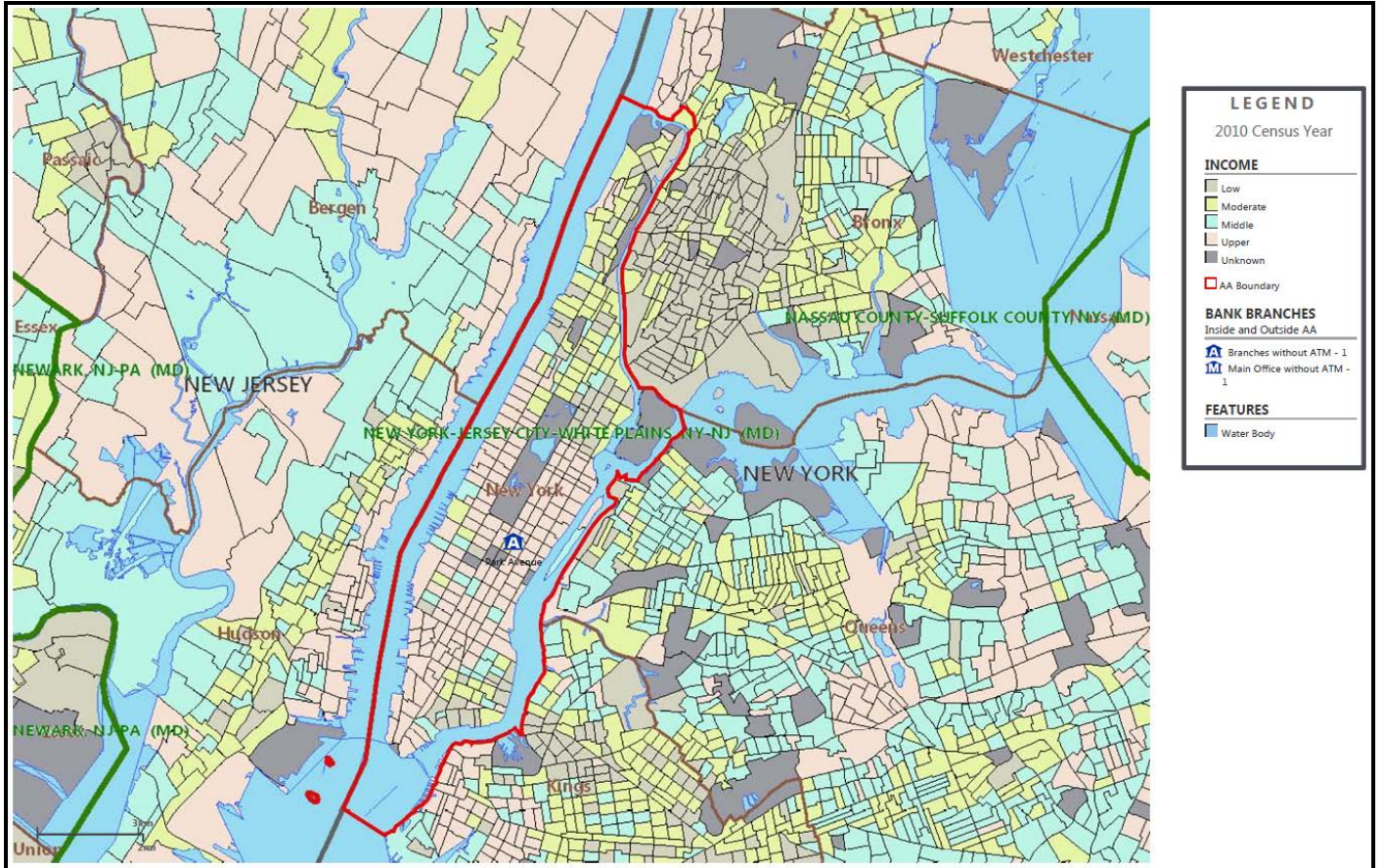
2014 Aggregate Comparison Loan Distribution Table
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$ (000s)	Aggregate %	% \$ (000s)	#	Bank %	% \$ (000s)	Aggregate %	% \$ (000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.1%	1.1%	0	0.0%	0.0%	2.8%	0.6%
Moderate	3	33.3%	6.2%	13.9%	5.7%	0	0.0%	0.0%	10.7%	3.9%
Middle	1	11.1%	11.7%	29.2%	15.1%	1	11.1%	2.6%	14.3%	7.1%
Upper	5	55.6%	82.1%	54.8%	78.1%	6	66.7%	63.2%	58.6%	74.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	34.2%	13.7%	14.3%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	1	20.0%	6.3%	2.5%	0.9%	0	0.0%	0.0%	4.7%	1.4%
Moderate	2	40.0%	10.6%	12.7%	5.3%	0	0.0%	0.0%	10.1%	3.9%
Middle	0	0.0%	0.0%	26.3%	14.2%	0	0.0%	0.0%	14.1%	7.0%
Upper	2	40.0%	83.1%	58.6%	79.6%	3	60.0%	73.9%	59.5%	78.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	26.1%	11.6%	8.9%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	0.9%	0.1%	0	0.0%	0.0%	3.2%	0.2%
Moderate	0	0.0%	0.0%	10.6%	5.2%	0	0.0%	0.0%	7.6%	2.0%
Middle	0	0.0%	0.0%	25.2%	10.7%	0	0.0%	0.0%	13.5%	4.4%
Upper	1	100.0%	100.0%	63.3%	84.0%	1	100.0%	100.0%	68.6%	83.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.0%	10.3%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	25.5%	13.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	37.3%	63.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	25.5%	17.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	11.8%	4.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	1	6.7%	1.2%	2.4%	1.6%	0	0.0%	0.0%	3.6%	0.9%
Moderate	5	33.3%	6.3%	13.4%	8.5%	0	0.0%	0.0%	10.3%	3.6%
Middle	1	6.7%	8.0%	27.8%	14.7%	1	6.7%	1.8%	14.1%	6.6%
Upper	8	53.3%	84.6%	56.5%	75.1%	10	66.7%	69.9%	59.1%	72.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	26.7%	28.4%	13.0%	16.6%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

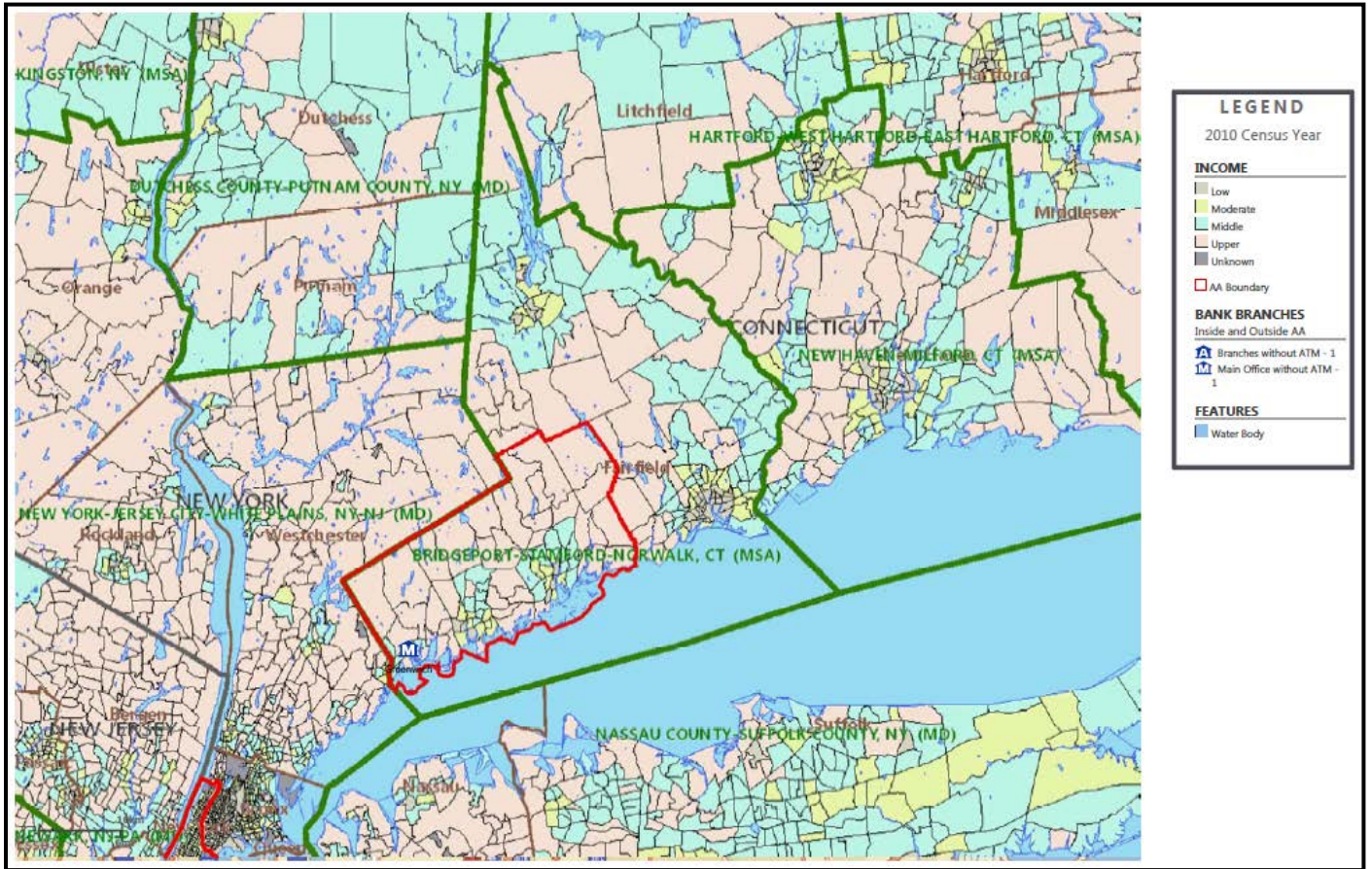
Originations and Purchases

CRA APPENDIX C

MAPS OF ASSESSMENT AREAS MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)



MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)



CRA APPENDIX D

GLOSSARY

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 metropolitan area/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

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 LMI individuals.

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: A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

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 income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

Household: A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

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

Metropolitan Statistical Area (“MSA”): A geographic entity defined by the federal Office of Management and Budget for use by federal statistical agencies, based on the concept of a core area with a large population nucleus, plus adjacent communities having a high degree of economic and social integration with that core.

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

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

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.

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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Upper-income: Individual income that is more than 120% of the area median income, or a median family income that is more than 120%, in the case of a geography.