

PUBLIC DISCLOSURE

August 10, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Amboy Bank
RSSD No. 9807**

**3890 U.S. Hwy 9
Old Bridge, New Jersey 08859**

**FEDERAL RESERVE BANK OF NEW YORK
33 LIBERTY STREET
NEW YORK, NEW YORK 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'S CRA RATING

Amboy Bank (“Amboy”) is rated “Satisfactory.” The following table indicates the performance level of the institution with respect to the lending, investment and service tests:

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending* Test	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

The major factors supporting the institution’s rating follow:

- Amboy was a leader in community development loan activity.
- A high percentage of Amboy’s total loans were originated within the assessment area.
- The distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good penetration throughout the assessment area.
- Lending activity levels reflect adequate responsiveness to assessment area credit needs.
- Amboy made an adequate level of qualified community development investments and grants.
- Amboy provides a relatively high level of community development services to its assessment area.

DESCRIPTION OF INSTITUTION

Amboy Bank (“Amboy”), headquartered in Old Bridge, NJ, is a full-service commercial bank with 23 branches. The bank is a wholly-owned subsidiary of Amboy Bancorporation, also headquartered in Old Bridge, NJ. As of June 30, 2015, Amboy had total assets of \$2.3 billion with \$1.5 billion in net loans and leases. Of the total loans, \$405 million consisted of construction and land development loans and \$440 million consisted of 1-4 family residential real estate loans. The remainder includes loans secured by multi-family properties and non-residential properties.

The bank offers a wide range of consumer-related services including retail deposit products, small business loans, residential construction loans, first- and second-lien mortgage loans, and reverse mortgage loans.

Amboy operates in a competitive banking market. Competitors include large federal banks, local community and state chartered banks, credit unions, mortgage companies and non-bank financial institutions. The deposit market is dominated by large financial institutions such as PNC Bank, Wells Fargo Bank, Bank of America and TD Bank. These top four banks control 51% of the deposit market share.

Amboy has no financial or legal impediments that would prevent it from fulfilling its responsibilities under CRA. The bank’s previous CRA examination, dated April 8, 2013, resulted in a “Satisfactory” rating.

DESCRIPTION OF ASSESSMENT AREA

Amboy has one assessment area, which is part of the MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA). The entire assessment area is contained within MD 35614 (New York-Jersey City-White Plains, NY-NJ), which includes all of Middlesex and Monmouth counties in New Jersey. During last evaluation, these counties were part of the MD 20764 (Edison-New Brunswick, NJ). With the release of the Office of Management and Budget (“OMB”) bulletin 13-01, on February 28, 2013, MD 20764 was eliminated while Middlesex and Monmouth counties were incorporated into MD 35614. This change triggered modifications in the distribution of census tracts by income level of the population, the distribution of owner-occupied housing units by income level of the census tract, and the distribution of population by income level. Except where noted, Description of Assessment Area is based on the data pertaining to the MD 20764 from 2013.

Under the 2010 Census, Amboy’s assessment area consisted of 319 census tracts, of which 21 were low-income, 45 were moderate-income, and 251 were middle- and upper-income. There are two tracts in the assessment area with an “unknown” income designation. Amboy’s assessment area is in compliance with the requirements of Section 228.41 of Regulation BB and does not arbitrarily exclude low- and moderate-income (“LMI”) geographies. Additional

assessment area data can be found in the Exhibit I. See Appendix B for a map of the assessment area.

SCOPE OF EXAMINATION

Amboy's CRA performance was evaluated using the Federal Financial Institutions Examination Council's ("FFIEC") CRA Interagency Examination Procedures for Large Retail Institutions. Amboy's Home Mortgage Disclosure Act ("HMDA") related, consumer (home equity) and small business lending was evaluated from January 1, 2013 through December 31, 2014, while its community development, qualified service and investment activities were evaluated from January 1, 2013 through June 30, 2015, in accordance with FFIEC examination procedures.

Products

Examiners evaluated home purchase, refinance, consumer (home equity) and CRA-reportable small business loans during this examination. In addition, community development loans, investments, and services were reviewed. Amboy made a minimal number of home improvement, small farm, and multifamily loans, in line with its business strategy. Due to their insignificant volumes these products were excluded from the analysis of Amboy's lending performance, although multifamily lending was reviewed for community development lending credit.

The real estate-related mortgage loans considered in the evaluation were reported under the HMDA and the small business loans were reported under the CRA. Examiners verified the integrity of the bank's HMDA-related, CRA-reportable small business and consumer loan data provided by the bank for the reporting years 2013 and 2014.

Lending Analysis

The borrower and geographic loan distribution analyses were based on loan activity in Amboy's assessment area. Amboy's performance in 2013 and 2014 was compared to 2010 Census demographic data.

To evaluate the geographic distribution of HMDA-related lending, the proportion of loan originations was compared to the proportion of owner-occupied housing units located in LMI geographies. To evaluate consumer loans, the proportion of Amboy's loan originations was compared to the proportion of households located in LMI geographies. For small business loans, the analysis compared the proportion of Amboy's loan originations to the proportion of businesses located in LMI geographies.

To evaluate the borrower characteristics of HMDA-related lending, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment area. Income estimates from the U.S. Department of Housing and Urban Development ("HUD") were used to categorize borrower income. To evaluate consumer loans,

the proportion of Amboy's loan originations was compared to the proportion of LMI households in the assessment area. For small business lending, Amboy's proportion of loans to businesses with gross annual revenues ("GAR") of \$1 million or less, based on Dun & Bradstreet ("D&B") data, was compared to the proportion of all such businesses located in the assessment area. The size of the small business loans was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

Borrower and geographic distribution analyses were based on Amboy's 2013 performance compared to the performance data for the aggregate of all loan reporters in the assessment area. At the time of the evaluation the 2013 aggregate data is the most recent aggregate data publicly available. In addition, aggregate lending data is not available for consumer loans and therefore no aggregate comparison could be made for that loan category. The bank's performance in 2014 was compared to the bank's 2013 performance for consistency.

Deriving Overall Conclusions

Before reaching a conclusion about the overall performance regarding geographic distribution and borrower characteristics in the assessment area, examiners weighted loan products by the total retail lending volume in order to determine the influence of performance on the overall conclusion. Peer data was also used for the analysis of community development loans and qualified investments. Local peer banks were selected based on their amounts of assets, deposits and branches and their presence within Amboy's assessment area.

Examiners also conducted interviews with representatives of two community development organizations in order to gain an understanding of local credit needs.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include U.S. Department of Commerce's Bureau of the Census (2010 Census), the U.S. Department of Labor, the U.S. Department of Housing and Urban Development ("HUD"), the New Jersey Department of Labor, D&B, and the New Jersey Realtors Association.

Demographic Characteristics

According to the 2010 Census, the total population of Amboy's assessment area is 1,440,238. The assessment area has 509,911 households, of which 71% are families. 7% of the population resides in low-income geographies, while 14% reside in moderate-income geographies, and 79% reside in middle- and upper-income geographies.

Income Characteristics

According to 2010 Census data, 19% of families in the assessment area are low-income while 17% of families are moderate-income. The assessment area is a high-income area with a significant majority of census tracts and families in the middle- and upper-income categories.

FFIEC estimated that the median family income level for the assessment area was \$96,600 in 2013, compared to the State of New Jersey's median family income of \$71,629.

Housing Characteristics

According to the 2010 Census, there are 362,185 owner-occupied housing units in the assessment area, of which 2% is located in low-income geographies and 11% are located in moderate-income geographies.

Housing costs are relatively expensive in the assessment area, although prices have declined due to the nationwide housing crisis. The National Association of Realtors reports the 2013 median sales price of a single family home in the Amboy's Assessment Area was 392,100 while 2014 median sales price of a single family home in the Amboy's Assessment Area was \$394,900. Housing costs are very expensive for LMI families, with the median housing costs ranging from about four to six times the median family income of a low-income borrower and about three to four times the income of a moderate-income borrower. Community contacts indicated that the provision of affordable housing for the LMI population in the assessment area is a critical need. Furthermore, community contacts indicated that opportunities to support affordable housing for the banks in New Jersey may decrease due to State's Supreme Court decision to remove jurisdiction over affordable housing from The Council on Affordable Housing (COAH). COAH was responsible for defining housing regions, estimating the needs for low- and moderate-income housing, allocating fair share numbers by municipality and reviewing plans to fulfill these obligations. In March of 2015, NJ Supreme Court ruled that determination of affordable housing obligations would be administered by the court.

Labor, Employment and Economic Characteristics

According to the 2013 D&B data, there were 80,211 businesses operating within the assessment area. 5% are located in low-income areas and 11% are located in moderate-income areas. The majority of businesses, 84%, are in middle and upper income areas. Of the total number of businesses in the assessment area, 88% are small businesses with gross annual revenue ("GAR") of \$1 million or less.

According to data from the Bureau of Labor Statistics, unemployment rates have decreased in the assessment area since the prior examination. This decrease can be attributed to the slow national economic recovery. In December of 2014 the unemployment rate for Middlesex and Monmouth counties was 5.1% and 5.2% respectively compared to 6.0% and 6.1% in December of 2013. At the end of the prior examination, in December of 2012, the unemployment rate for Middlesex and Monmouth counties was 7.8% and 8.3% respectively. The largest sector providing employment in the assessment area is the trade, transportation, and utilities sector, which accounts for approximately one third of the assessment area's employment opportunities.

Community contacts also indicated the availability of affordable housing, programs for prospective homeowners and mortgage counseling as important community development needs. Exhibit I contains additional Assessment Area Demographics information.

Exhibit I Assessment Area Demographics MD 20764, 2013								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	21	6.6	16,443	4.5	3,883	23.6	69,190	19.1
Moderate-income	45	14.1	47,157	13.0	4,322	9.2	60,926	16.9
Middle-income	164	51.4	188,031	52.0	6,625	3.5	80,384	22.2
Upper-income	87	27.3	109,904	30.4	2,197	2.0	151,043	41.8
Unknown-income	2	0.6	8	0.0	0	0.0	0	0.0
Total Assessment Area	319	100.0	361,543	100.0	17,027	4.7	361,543	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	32,312	7,272	2.0	22.5	21,166	65.5	3,874	12.0
Moderate-income	84,179	38,124	10.5	45.3	38,319	45.5	7,736	9.2
Middle-income	283,905	193,984	53.6	68.3	71,116	25.0	18,805	6.6
Upper-income	148,464	122,805	33.9	82.7	17,117	11.5	8,542	5.8
Unknown-income	139	0	0.0	0.0	8	5.8	131	94.2
Total Assessment Area	548,999	362,185	100.0	66.0	147,726	26.9	39,088	7.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	3,833	4.8	3,283	4.6	288	4.8	262	8.1
Moderate-income	8,927	11.1	7,669	10.8	801	13.2	457	14.1
Middle-income	40,272	50.2	35,699	50.3	2,957	48.9	1,616	49.9
Upper-income	27,179	33.9	24,268	34.2	2,007	33.2	904	27.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	80,211	100.0	70,919	100.0	6,053	100.0	3,239	100.0
		Percentage of Total Businesses:		87.9		8.3		3.9
Based on 2010 ACS data and 2014 D&B information according to 2010 ACS Boundaries.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST¹

Amboy’s performance under the lending test is rated high satisfactory. Amboy was a leader in community development lending activity, the bank’s geographic distribution was good and borrower distribution was adequate. Amboy also originated a high percentage of its total loans within assessment area.

As detailed in the Exhibit II below, Amboy originated 710 home purchase, refinance, home improvement, consumer related, and small business loans, totaling \$252 million, reflecting adequate responsiveness to assessment area credit needs.

Exhibit II				
Summary of Lending Activity				
January 1, 2013 - December 31, 2014				
Loan Type	#	%	\$(000s)	%
Home Purchase	155	21.8%	35,289	14.0%
Refinancing	102	14.4%	19,014	7.5%
Home Improvement	6	.8%	892	.4%
Multi Family	12	1.7%	120,880	48.0%
Total HMDA related	275	38.7%	176,075	69.9%
Total Consumer related	160	22.5%	13,149	5.2%
Total Small Bus. related	275	38.7%	62,846	24.9%
TOTAL LOANS	710	100%	252,070	100%

Overall, Amboy’s lending volume declined since the prior examination. The number of HMDA-related, consumer and small business loan originations made during this examination period within the assessment area declined 17% from the number of loans made during the last examination period. Volume decreased in comparison to the last examination due to the reduced opportunities caused by the overall weak economic conditions in the assessment area. However, even though the number of loans originated declined from 851 during last examination period to 710 during current examination, the dollar volume of these loans increased 60%, from \$158 million to \$252 million. The increase in dollar volume was due to an increase in multi-family and construction lending.

In terms of deposit market share, Amboy had 4% of the deposit market share in the combined counties of Middlesex and Monmouth as of June 30, 2014, with \$1.6 billion in deposits. In terms of deposits, the bank ranked 10th out of 52 banks operating in these counties.

¹ The entire assessment area is contained within MD 35614 (New York-Jersey City-White Plains, NY-NJ), which includes all of Middlesex and Monmouth counties in New Jersey. During last evaluation, these counties were part of the MD 20764 (Edison-New Brunswick, NJ). With the release of the Office of Management and Budget (“OMB”) bulletin 13-01, on February 28, MD 20764 was eliminated while Middlesex and Monmouth counties were incorporated into MD 35614. Except where noted, Lending Test analysis is based on the data pertaining to the MD 20764 from 2013.

Amboy’s lending activity was generally weaker, when compared to the seven other similarly-situated peer banks. Specifically, Amboy ranked 8th in terms of the total HMDA and small business loans per million dollars of deposits, 8th for HMDA loans per million dollars of deposits, and 5th for small business loans per million dollars of deposits.

Assessment Area Concentration

A high percentage of Amboy’s total lending was originated within the assessment area. Amboy extended 78% of its total loans to individuals residing and businesses operating in the assessment area. In particular, 68% of HMDA loans, 85% of small business loans, and 69% of its consumer related loans by number, were made in Amboy’s assessment area, however only 17% of multi-family lending was within the assessment area. Lending within the assessment area increased slightly since the prior examination when 77% of Amboy’s total loans were made inside the assessment area.

In 2013, Amboy implemented a strategy to increase the volume of its multifamily lending to increase asset size and revenue. The majority of the multifamily loans were made outside Amboy’s assessment area. See Exhibits II and III for additional details relating to Amboy’s 2013-2014 lending activity inside and outside of the assessment area.

Exhibit III								
Lending Inside and Outside the Assessment Area								
January 1, 2013 - December 31, 2014								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase	99	63.9	27,801	78.8	56	36.1	7,488	21.2
Refinancing	83	81.4	13,755	72.3	19	18.6	5,259	27.7
Home Improvement	5	83.3	742	83.2	1	16.7	150	16.8
Multi-Family	2	16.7	9,686	8.0	10	83.3	111,194	92.0
Total HMDA related	189	67.7	51,984	29.5	86	31.3	124,091	70.5
Total Consumer related	132	68.7	10,505	79.9	28	17.5	2,644	20.1
Total Small Business related	234	85.1	48,251	76.8	41	14.9	14,595	23.2
TOTAL LOANS	555	78.2	110,740	43.9	155	21.8	141,330	56.1

Geographic Distribution of Loans

Amboy’s overall geographic distribution of loans reflects good penetration throughout the assessment area. This lending performance is based on the bank’s adequate lending penetration in low-income geographies and good lending penetration in moderate-income geographies.

According to the 2010 Census, the MD has 362,185 owner-occupied housing units, of which 7,272 (2%) in 2013 were located in low-income geographies. Opportunities to lend increased in the moderate-income census tracts, compared to the low-income tracts. Specifically, 38,124

(11%) owner-occupied housing units were located in the moderate-income tracts in 2013. Additionally, out of a total of 70,919 small businesses, 3,283 (5%) are located within low-income tracts, while 7,669 (11%) are located in moderate-income census tracts. The following table summarizes 2013 lending performance in MD 20764 (Edison, New Brunswick, NJ) in low and moderate-income census tracts. Amboy’s overall lending in 2014 was comparable to 2013.

MD 20764 (Edison-New Brunswick, NJ)				
Product	Low-income Tracts		Moderate-income Tracts	
	Amboy Performance	2013 Aggregate Comparison	Amboy Performance	2013 Aggregate Comparison
Home Purchase	Good	Significantly Above	Excellent	Significantly Above
Refinance	Poor	Significantly Below	Excellent	Significantly Above
Consumer – Home Equity	Poor	N/A	Poor	N/A
Small Business	Good	Significantly Above	Good	Significantly Above

Home Purchase Loans

Amboy’s home purchase lending distribution was considered good in light of the availability of owner-occupied housing in low-income geographies in the assessment area. A total of 11% of Amboy’s home purchase loans in 2013 were in low-income geographies while 2% of all owner-occupied housing units in the assessment area were located in low-income geographies. This performance context consideration is confirmed by the performance of the market aggregate, which in 2013 made 2% of its home purchase loans in low-income geographies. Amboy’s 2014 home purchase lending performance in low-income geographies has decreased significantly, as the bank did not originate any loans in low-income geographies. The decrease was caused by the limited lending opportunities. Specifically, only 2% of the owner-occupied housing units are located in low-income geographies.

Amboy’s home purchase lending performance in moderate-income geographies was excellent in 2013. Amboy originated 11% of its home purchase loans in moderate-income geographies in 2013, compared to 11% of owner-occupied housing units located in moderate-income geographies in the MD in 2013. Amboy’s performance in moderate-income geographies was above the market aggregate, which made 9% of its home purchase loans in moderate-income geographies in 2013. Amboy’s 2014 home purchase lending performance was comparable to its 2013 performance.

Refinance Loans

Amboy's overall refinance lending performance in the low-income geographies of MD 20764 was poor. Amboy did not refinance any loans in low-income geographies during the examination period. The aggregate made only 2% of its refinance loans in low income geographies in 2013. Amboy's poor refinance lending in low-income geographies is understandable when considering performance context factors that make HMDA-related lending challenging in low-income geographies. Specifically, 2% of owner-occupied housing units located in low-income census tracts in 2013, indicating very limited lending opportunities.

Amboy's refinance lending performance in moderate-income geographies was excellent. Amboy originated 9% of its refinance loans in moderate-income geographies in 2013 compared to 11% of owner-occupied housing units located in moderate-income geographies in this MD in 2013. Amboy's performance was slightly above the market aggregate in 2013, which originated 8% of its refinance loans in moderate-income census tracts in 2013. Amboy's 2014 refinance lending performance was comparable to its 2013 performance.

Consumer Lending: Home Equity Loans

Amboy's overall consumer home equity lending performance in the LMI geographies of MD 20764 was poor. Amboy's home equity lending performance in low-income geographies is understandable when considering performance context factors that make HMDA-related lending challenging in low-income geographies. Specifically, 2% of owner-occupied housing units are located in low-income census tracts in 2013, indicating very limited lending opportunities. Amboy did not extend any home equity loans in low-income geographies during the examination period.

Amboy's consumer home equity lending performance in moderate-income geographies was good. Amboy originated 8% of its home equity loans in moderate-income geographies in 2013 and 11% of owner-occupied housing units located in moderate-income geographies in this MD. Amboy's performance cannot be compared to the market aggregate since aggregate data is not available for these loans. Amboy's overall 2014 consumer lending performance was comparable to its 2013 performance.

Small Business Loans

Overall, Amboy's small business lending performance in MD 20764 was good, based on outstanding performance in 2013. Amboy made 8% of its small business loans in 2013 in low-income geographies compared to 4.6% of small business establishments located in low-income geographies in 2013. Amboy's performance was significantly above the market aggregate which made 3% of its small business loans in low-geographies in 2013.

Amboy’s small business performance in moderate-income geographies was good based on outstanding performance in 2013. Amboy made 17% of its small business loans in 2013 in moderate-income geographies compared to 11% small business establishments located in moderate-income geographies. Amboy’s performance was significantly above the market aggregate which made 10% of its small business loans in moderate-income geographies in 2013. Amboy’s overall 2014 small business lending performance was comparable to its 2013 performance.

Distribution by Borrower Income and Revenue Size of the Business

Amboy’s distribution of borrowers in the assessment area reflects adequate penetration among borrowers of different income levels and businesses of different sizes. Overall, lending to low- and moderate-income borrowers and small businesses in 2013 was adequate, as indicated in the chart below. Amboy’s overall lending with respect to distribution by borrower income and revenue size of the business in 2014 was comparable to 2013.

MD 20764 (Edison-New Brunswick, NJ)				
Product	Low-income Borrowers		Moderate-income Borrowers	
	Amboy Performance	2013 Aggregate Comparison	Amboy Performance	2013 Aggregate Comparison
Home Purchase	Poor	Significantly Below	Good	Slightly Above
Refinance	Excellent	Significantly Above	Excellent	Significantly Above
Consumer – Home Equity	Poor	N/A	Adequate	N/A
	Lending to Businesses with GAR <= \$1 million		2013 Aggregate Comparison	
Small Business	Good		Significantly Above	

Low-income Borrowers

Amboy’s HMDA lending performance in lending to low-income borrowers was overall adequate when compared to the 2010 Census demographic data, which indicated that in 2013 19% of the assessment area families are low-income, and the performance of the aggregate. In 2013, the bank made 2% of its home purchase loans and 20% of its refinance loans to low-income borrowers. Amboy’s performance for home purchase was significantly below the aggregate while its performance for refinance loans was significantly above the aggregate. The aggregate made 6% of its home purchase loans and 6% of its refinance loans to low-income borrowers. Amboy’s distribution of consumer loans to low-income borrowers was poor. The bank did not originate any consumer home equity loans to low-income borrowers in 2013. Amboy’s 2014 lending to low-income borrowers was comparable to its 2013 performance.

Moderate-income Borrowers

Amboy’s HMDA lending performance to moderate-income borrowers was overall good, when compared to the 2010 Census demographics, which indicated that 17% of families in the assessment area were of moderate-income in 2013, and the performance of the aggregate. In 2013, the bank made 25% of its home purchase loans and 22% of its refinance loans to moderate-income borrowers. Amboy’s performance in 2013 for home purchase was slightly above the aggregate, while its performance for refinance loans in 2013 was significantly above the aggregate. The aggregate made 21% of its home purchase and 15% of its refinance loans to moderate-income borrowers in 2013. Amboy’s distribution of consumer loans to moderate-income borrowers was adequate. The banks made 8% of its consumer loans to moderate-income borrowers while 17% of families in the Assessment Area are moderate-income families. Amboy’s lending to moderate-income borrowers in 2014 was comparable to the 2013 lending performance.

The table below details bank’s loan distribution with respect to consumer lending.

2013 Consumer Loan Distribution Table MD 20764 (Edison-New Brunswick, NJ)								
	Home Equity Loans							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	3	4.5%	125	8.8%
Moderate	5	7.5%	401	7.9%	16	23.9%	955	16.9%
Middle	34	50.7%	2,296	45.4%	17	25.4%	1,238	23.8%
Upper	28	41.8%	2,359	46.7%	27	40.3%	2,503	32.8%
Unknown	0	0.0%	0	0.0%	4	6.0%	235	17.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	67	100.0%	5,056	100.0%	67	100.0%	5,056	100.0%

Small Business Lending

Amboy provided a good level of lending to small business borrowers with of \$1 million or less. In 2013 the bank made 67% of its small business loans to such businesses, compared to the 88% of business establishments in the MD with GAR of \$1 million or less. Performance was significantly above the aggregate, which made 47% of its small business loans to businesses with GAR of \$1 million or less. The bank made 52% of its small business loans in amounts of \$100,000 or less in 2013. This was below the aggregate, which made 94% of its small business loans in amounts of \$100,000 or less in the same period. The comparison of loans in the amount of \$100 thousand dollars or less is skewed as the aggregate includes large national credit card

lenders which typically offer loans in smaller dollar amounts. Bank's 2014 small business lending performance was comparable to 2013. Exhibit IV provides additional information with respect to Amboy's loan distribution when compared to the aggregate.

Exhibit IV										
2013 Loan Distribution Table										
MD 20764 (Edison-New Brunswick, NJ)										
Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
Home Purchase										
Low	6	10.5%	8.9%	2.4%	1.7%	1	1.8%	0.7%	6.0%	2.7%
Moderate	6	10.5%	11.2%	9.3%	6.4%	14	24.6%	14.3%	20.9%	14.2%
Middle	29	50.9%	42.6%	50.6%	43.4%	11	19.3%	12.4%	23.9%	21.2%
Upper	16	28.1%	37.3%	37.6%	48.5%	28	49.1%	65.3%	39.2%	49.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	5.3%	7.2%	10.0%	12.1%
<i>Total</i>	<i>57</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>57</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%	2.0%	11	20.4%	13.6%	6.1%	3.1%
Moderate	5	9.3%	7.0%	7.9%	7.3%	12	22.2%	18.1%	14.7%	9.3%
Middle	30	55.6%	54.1%	50.9%	45.0%	11	20.4%	17.7%	22.9%	18.0%
Upper	19	35.2%	38.9%	39.3%	45.7%	16	29.6%	40.4%	42.6%	47.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	7.4%	10.2%	13.8%	21.9%
<i>Total</i>	<i>54</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>54</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%	1.9%	1.5%	0	0.0%	0.0%	7.6%	3.9%
Moderate	0	0.0%	0.0%	8.3%	4.9%	0	0.0%	0.0%	18.0%	9.6%
Middle	2	50.0%	33.6%	50.4%	40.2%	1	25.0%	34.5%	24.2%	20.2%
Upper	2	50.0%	66.4%	39.3%	53.4%	3	75.0%	65.5%	46.0%	58.7%
Unknown	0	0.0%	0.0%	0.1%	0.0%	0	0.0%	0.0%	4.2%	7.6%
<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>
Multi-Family										
Low	0	0.0%	0.0%	23.7%	22.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.2%	15.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	40.7%	54.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.4%	8.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	6	5.1%	3.6%	2.2%	2.7%	12	10.3%	4.2%	6.1%	2.8%
Moderate	11	9.4%	6.6%	8.4%	7.3%	26	22.2%	11.0%	16.7%	10.5%
Middle	63	53.8%	62.2%	50.7%	44.8%	23	19.7%	10.8%	23.2%	18.3%
Upper	37	31.6%	27.6%	38.7%	45.3%	47	40.2%	39.4%	41.5%	46.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	7.7%	34.5%	12.5%	21.5%
<i>Total</i>	<i>117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESS										
By Tract Income										
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	10	7.7%	9.5%	3.3%	3.5%					
Moderate	22	16.9%	19.2%	9.9%	12.3%					
Middle	58	44.6%	39.4%	47.8%	46.9%					
Upper	40	30.8%	31.9%	37.4%	36.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.5%	1.1%					
<i>Total</i>	<i>130</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
By Revenue										
\$1 Million or Less	87	66.9%	61.9%	46.9%	31.4%					
By Loan Size										
\$100,000 or less	68	52.3%	12.0%	93.5%	38.4%					
\$100,001-\$250,000	28	21.5%	17.1%	3.1%	14.3%					
\$250,001-\$1 Million	34	26.2%	70.8%	3.4%	47.3%					
<i>Total</i>	<i>130</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
Originations and Purchases										

Community Development Lending

Amboy was a leader in community development loan activity. Amboy made \$263 million in community development loans, which represents 11% of Amboy’s total assets. On an annualized basis, Amboy’s community development lending more than tripled since the prior evaluation period, when Amboy originated a total of \$58 million in community development loans.

Of the total community development loans extended, \$21 million or 8% were made inside the assessment area. Amboy received credit for qualified community development loans made outside of its assessment area because under the CRA, if a bank has adequately addressed the needs of its assessment area(s), then consideration can be given to community development loans that benefit the broader statewide or regional area that includes the assessment area. All loans made outside of Amboy’s assessment area were to borrowers located in the State of New Jersey. See Exhibit V for additional details relating to Amboy’s Community Development Lending.

Exhibit V Community Development Lending Summary April 1, 2013 - June 30, 2015										
Assessment Area	#	Affordable Housing (\$000s)	#	Community Services (\$000s)	#	Economic Development (\$000s)	#	Revitalize and Stabilize (\$000s)	#	Total (\$000s)
MSA NJ 35614	6	6,251	1	4,471	0	0	3	10,000	10	20,722
NJ Outside AA	25	155,431	0	0	2	35,000	3	51,940	30	242,371
Total CD Loans	31	161,682	0	4,471	2	35,000	6	61,940	40	263,093
Percent Total # / \$	78%	61%	0%	2%	5%	13%	15%	24%	100%	100%

In terms of dollar volume, loans for affordable housing represented 61% of total community development lending and loans to revitalize low- and moderate-income areas was 24%. The majority of Amboy’s community development lending was construction and permanent financing of multifamily and condominium properties.

Community contacts identified affordable housing as a primary community need for LMI individuals, making these loans particularly responsive to the assessment area’s needs.

When compared to the seven other similarly-situated banks operating in the assessment area, Amboy’s level of total annualized community development lending, measured as a percentage of average assets and Tier 1 capital, compared favorably.

Community development loans include:

- A \$9.6 million loan to construct 28 below market rate apartment units in Asbury Park, New Jersey. The apartment complex is within a low-income census tract that was included in Asbury Park’s waterfront redevelopment plan that was adopted by the town in 2010. The area is also part of a designated disaster area created by FEMA in response to Hurricane Sandy. All rents for the apartment complex are below HUD’s fair market rent guidelines for Monmouth County and therefore are affordable to moderate-income borrowers.
- A \$200,000 loan to a non-profit foundation established to assist businesses and homeowners affected by Hurricane Sandy.
- A \$3.9 million commitment for construction of 39 townhouse residential condominium units of which 8 meet Council on Affordable Housing (“COAH”) Guidelines for the State of New Jersey in Little Silver, New Jersey. Community development credit in the amount of \$815,000 was given for the 8 COAH units.
- A \$2.8 million loan for the construction of 34 affordable townhouse units in Trenton, New Jersey. The homes are located in a low-income census tract that is part of a New Jersey enterprise zone and the local Trenton redevelopment zone.

INVESTMENT TEST

Amboy made an adequate level of qualified community development investments in its assessment area. Amboy’s community development investment activity exhibited significant responsiveness in light of the limited opportunities for qualified community development investments in its assessment area. Amboy’s assessment area is a relatively high income area, which makes it challenging for Amboy to find qualified investment opportunities. As presented in Exhibit VI, during the examination period, Amboy made a total of \$7 million in qualified investments. This is an increase of \$1 million compared to the prior examination period. On an annualized basis, Amboy’s level of qualified investments also increased compared to the last examination period.

Exhibit VI		
Summary of Qualified Investments		
January 1, 2013 - June 30, 2015		
Designation	\$ (thousands)	%
Affordable Housing	\$6,203	86%
Economic Development	\$642	9%
Community Services	\$336	5%
TOTAL ACTIVITY	\$7,181	100%

Of the bank’s total qualified investments, \$345 thousand or 5% was made in the assessment area. These investments consisted entirely of new community development grants made to a variety of

non-profit organizations with primary missions of providing affordable housing or community services to LMI individuals. The bank did not make use of innovative and/or complex investments to support community development initiatives in the assessment area.

The remaining 95% of Amboy's qualified investments were made to investment funds, which partially benefited its assessment area, as well as the broader statewide region. Amboy received credit for qualified investments made outside of its assessment area because under the CRA, if a bank has adequately addressed the needs of its assessment area(s), consideration can be given to qualified investments that benefit the broader statewide or regional area that includes the assessment area. Community development investments were primarily dedicated to affordable housing, which is a prominent need in the assessment area, as identified by local community contacts.

In terms of dollar volume, 84% of Amboy's total qualified investments consisted of mortgage-backed securities, collateralized by loans targeted to LMI individuals. While mortgage-backed securities provide some liquidity to the market, they are viewed qualitatively as less responsive to community development needs of LMI communities than direct investments.

When compared to the seven other similarly-situated banks operating in the assessment area, Amboy's level of total annualized qualified investments, when measured as a percentage of average assets and assessment area deposits, was comparable.

Qualified community development investments include:

- A \$500,000 investment in a Community Development Financial Institution (CDFI) that provides construction and permanent financing to community and economic development projects, including affordable housing, community development facilities, and commercial real estate.
- A \$125,000 investment in a regional CDFI that is a leader in neighborhood revitalization. The organization uses capital to preserve and rehabilitate affordable housing, and special community development financing to bring supermarkets, education and job opportunities to LMI communities and individuals.
- A \$100,000 investment in a New Jersey based CDFI that finances community businesses by extending credit, making investments, and utilizing other financial tools.
- \$11,000 in grants to a not-for-profit corporation dedicated to provide at-risk youth a chance to grow toward their potential in an environment that promotes belonging, dignity and hope.

SERVICE TEST

Amboy’s performance under the service test was rated high satisfactory based on a relatively high level of community development services made in the assessment area and a good branch distribution.

Retail Services

Amboy’s delivery systems are accessible to essentially all of the bank’s geographies and individuals of different income levels in the assessment area. Amboy operates 23 branches, of which, a total of two or 9% are located in low-income census tracts and two or 9% are located in moderate-income census tracts, based on the 2010 Census. In comparison, 7% of the census tracts in Amboy’s assessment area are low-income census tracts, while 14% are moderate-income census tracts. In addition, 6% of the assessment area’s population resides in low-income tracts and 14% of the assessment area’s population resides in moderate-income tracts.

Amboy’s record of opening and closing branches did not adversely affect the accessibility of Amboy’s delivery systems, particularly to LMI geographies and/or LMI individuals. Specifically, the bank did not open or close any branches during the examination period. All branch offices provide similar products and banking services, and branch hours do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals. 91% of the branches in the assessment area have extended morning, evening and Saturday hours available.

Alternative delivery system accessible for all bank’s customers, including LMI individuals. Amboy has ATMs at all branch locations and offers Internet, telephone, and bank-by-mail services. No service is specifically targeted to LMI customers.

Community Development Services

Amboy provided a relatively high level of community development services to its assessment area. As presented in Exhibit VII, during the examination period, the bank conducted 66 community development service events, which consisted of financial literacy, housing seminars, and supplemental retirement income seminars, as well as the technical assistance to non-profits and small businesses in its assessment area.

Exhibit VII	
Summary of Community Development Services	
January 1, 2013 – June 30, 2015	
Activity Type	Current Examination Total
Residential Mortgage/First-time Homebuyers Seminars	17
Technical Assistance to Community Organizations	2
Financial Literacy Events	47
TOTAL ACTIVITY	66

Opportunities for participation by local financial institutions include providing financial education, teaching budgeting techniques and reaching underserved and under-banked communities. Amboy has worked with area schools and non-profit organizations to provide financial literacy education.

Amboy's local branches regularly conduct seminars for area senior residents on retirement income options and financial planning.

Twenty nine bank representatives participated on the board or as committee members of thirty six development organizations on an on-going basis, compared to participation with thirteen such organizations at the last examination. These community development organizations include:

- A community organization that raises funds for victims affected by natural disasters, most recently Hurricane Sandy, in Middlesex County.
- A community organization that seeks to promote social independence, quality of life and maximum vocational potential for all persons with special needs.
- A community organization that seeks to providing safe, affordable housing that serves families, seniors, and special needs individuals throughout New Jersey.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Amboy 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 credit needs of the assessment area.

CRA APPENDIX A

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; activities that revitalize or stabilize low- or moderate-income geographies; or loans, investments or services that (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301c of the Housing and Economic Recovery Act of 2008 ("HERA"), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program ("NSP"); (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; (iii) Benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or geographies outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or

b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 refinancing 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.

Metropolitan Division: A county or group of counties within a **Metropolitan Statistical Area** that contains a population of at least 2.5 million and represents an employment center(s) associated through commuting ties.

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 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 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 geography.

CRA APPENDIX B

Assessment Area Map

