UNITED STATES OF AMERICA
Before The
OFFICE OF THRIFT SUPERVISION

In the Matter of	)	Order No.: NE-11-07
SENECA FALLS SAVINGS BANK	)	Effective Date: February 8, 2011
Seneca Falls, New York OTS Docket No.18024	)	

ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY

WHEREAS, SENECA FALLS SAVINGS BANK, Seneca Falls, New York, OTS Docket No. 18024 (Association), by and through its Board of Directors (Board), has executed a Stipulation and Consent to the Issuance of an Order of Assessment of a Civil Money Penalty (Stipulation); and

WHEREAS, the Association, by executing the Stipulation, has consented and agreed to the issuance of this Order of Assessment of Civil Money Penalty (Order) by the Office of Thrift Supervision (OTS), pursuant to 42 U.S.C. § 4012a(f) and 12 U.S.C. § 1818(i); and

WHEREAS, pursuant to delegated authority, the OTS Regional Director for the Northeast Region (Regional Director), is authorized to issue Orders of Assessment of a Civil Money Penalty where a savings association has consented to the issuance of an order.

NOW, THEREFORE, IT IS ORDERED that:

Payment of Civil Money Penalty.

1. Effective immediately, the Association is assessed and shall pay the sum of three thousand eight hundred and fifty Dollars ($3,850) by tendering a certified check or bank draft made payable to the order of the National Flood Insurance Program – Mitigation Fund, together with a copy of the executed Order and a cover letter referencing Seneca Falls Savings Bank, Seneca Falls, New York, OTS Docket No. 18024 to: Kevin Montgomery, Financial Management Specialist, Federal Emergency Management Agency (FEMA), National Flood Insurance Program, 1800 South Bell Street, Room 510, Arlington, Virginia 20598-3010. A copy of the certified check or bank draft and the cover letter shall be provided by U.S. Mail or overnight courier to Margaret G. Clark, Regional Enforcement Counsel, Office of Thrift Supervision, Harborside Financial Center Plaza Five, Suite 1600, Jersey City, New Jersey, 07311.

Effective Date, Incorporation of Stipulation.

2. This Order is effective on the Effective Date as shown on the first page. The Stipulation is made a part hereof and is incorporated herein by this reference.

IT IS SO ORDERED.

OFFICE OF THRIFT SUPERVISION

By: /s/
Michael E. Finn
Regional Director, Northeast Region

Date: See Effective Date on page 1

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SENECA FALLS SAVINGS BANK	)	Effective Date: February 8, 2011
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STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY

WHEREAS, the Office of Thrift Supervision (OTS), acting by and through its Regional Director for the Northeast Region (Regional Director), and based upon information derived from the exercise of its regulatory and supervisory responsibilities, has informed SENECA FALLS SAVINGS BANK, Seneca Falls, New York, OTS Docket No. 18024 (Association), that grounds exist to initiate a civil money penalty assessment proceeding against the Association pursuant to 42 U.S.C. § 4012a(f) (Flood Insurance Act) and 12 U.S.C. § 1818(i); and

WHEREAS, the Regional Director, pursuant to delegated authority, is authorized to issue Orders of Assessment of a Civil Money Penalty where a savings association has consented to the issuance of an order; and

WHEREAS, the Association desires to cooperate with the OTS to avoid the time and expense of an administrative civil money penalty proceeding by entering into this Stipulation and Consent to the Issuance of an Order of Assessment of a Civil Money Penalty (Stipulation),

without admitting or denying that such grounds exist, but only admitting the statements and conclusions in Paragraphs 1 and 2 below concerning Jurisdiction, hereby stipulates and agrees as follows:

Jurisdiction.

1. The Association is a "savings association" within the meaning of 12 U.S.C. § 1813(b) and 12 U.S.C. § 1462(4) and a "regulated lending institution" within the meaning of 42 U.S.C. § 4003(a)(10). Accordingly, the Association is an "insured depository institution" as that term is defined in 12 U.S.C. § 1813(c).

2. Pursuant to 12 U.S.C. § 1813(q) and 42 U.S.C. § 4003(a)(5), the Director of the OTS is the "appropriate Federal banking agency" and "appropriate Federal entity for lending regulation" to initiate and maintain a civil money penalty proceeding against the Association pursuant to 42 U.S.C. § 4012a(f).

OTS Findings of Fact.

3. The Association has failed to comply with the requirements set forth in 42 U.S.C. §§ 4001-4129, and OTS implementing regulations set forth at 12 C.F.R. Part 572 (Flood Regulations). Specifically, the OTS finds that on loans secured by property located in a flood hazard area in which flood insurance has been made available under the National Flood Insurance Act of 1968, the Association violated Section 572.3 of the OTS Flood Regulations, 12 C.F.R. § 572.3, by failing to obtain and maintain sufficient flood insurance for ten (10) loans. The OTS finds that these actions constituted a pattern or practice of violations under 42 U.S.C. § 4012a(f)(1) and that the Flood Insurance Act requires the assessment of a civil money penalty.

Consent.

4. The Association consents to the issuance by the OTS of the accompanying Order of

Assessment of a Civil Money Penalty (Order). The Association further agrees to comply with the terms of the Order upon the Effective Date of the Order and stipulates that the Order complies with all requirements of law.

Finality.

5. This Order is issued by the OTS under the authority of 42 U.S.C. §§ 4012a(f)(1) and 4012a(f)(5) and 12 U.S.C. § 1818(i) and upon the Effective Date it shall be a final order, effective and fully enforceable by the OTS under the provisions of 12 U.S.C. § 1818(h) and 42 U.S.C. § 4012a(f).

Waivers.

6. The Association waives the following:

(a) The right to be served with a written notice of the OTS's assessment of a civil money penalty against it as provided by 12 U.S.C. § 1818(i); 42 U.S.C. § 4012a(f)(4); and 12 C.F.R. Part 509;

(b) The right to an administrative hearing including, without limitation, any such right provided by 12 U.S.C. §§ 1818(h) or 1818(i), or 42 U.S.C. § 4012a(f)(4);

(c) The right to seek judicial review of the Order, including, without limitation, any such right provided by 12 U.S.C. §§ 1818 (h) or 1818(i), or otherwise to challenge the validity of the Order;

(d) Any and all claims against the OTS, including its employees and agents, and any other governmental entity for the award of fees, costs, or expenses related to this OTS enforcement matter and/or the Order, whether arising under common law, federal statutes, or otherwise; and

(e) The right to assert this proceeding, this consent to the issuance of the Order,

and/or the issuance of the Order, the payment of any monies, or the provision of any other financial relief as contemplated by the Order, as the basis for a claim of double jeopardy in any pending or future proceeding brought by the United States Department of Justice or any other governmental entity.

OTS Authority Not Affected.

7. Nothing in this Stipulation or accompanying Order shall inhibit, estop, bar or otherwise prevent the OTS from taking any other action affecting the Association if at any time the OTS deems it appropriate to do so to fulfill the responsibilities placed upon the OTS by law. The OTS agrees not to institute further proceedings against the Association for the specific acts, omissions, or violations in the Findings of Fact set forth in Paragraph 3 above to the extent known to the OTS as of the Effective Date of the accompanying Order, unless such acts, omissions, or violations reoccur.

Other Governmental Actions Not Affected.

8. The Association acknowledges and agrees that its consent to the issuance of the accompanying Order is solely for the purpose of resolving the matters addressed herein, consistent with Paragraph 7 above, and does not otherwise release, discharge, compromise, settle, dismiss, resolve, or in any way affect any actions, charges against, or liability of the Association that arise pursuant to this action or otherwise, and that may be or have been brought by any governmental entity other than the OTS.

Miscellaneous.

9. The laws of the United States of America shall govern the construction and validity of this Stipulation and the Order.

10. If any provision of this Stipulation and/or the Order is ruled to be invalid, illegal, or

unenforceable by the decision of any Court of competent jurisdiction, the validity, legality, and enforceability of the remaining provisions hereof shall not in any way be affected or impaired thereby, unless the Regional Director in his or her sole discretion determines otherwise.

11. All references to the OTS in this Stipulation and the Order shall also mean any of the OTS's predecessors, successors, and assigns.

12. The section and paragraph headings in this Stipulation and the Order are for convenience only and shall not affect the interpretation of this Stipulation or the Order.

13. The terms of this Stipulation and the Order represent the final agreement of the parties with respect to the subject matters hereof and constitute the sole agreement of the parties with respect to such subject matters.

Signature of Directors/Board Resolution.

14. Each Director signing this Stipulation attests that he or she voted in favor of a Board resolution authorizing the consent of the Association to the issuance of the Order and the execution of the Stipulation.

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WHEREFORE, the Association, by its directors, executes this Stipulation.

SENECA FALLS SAVINGS BANK
Seneca Falls, New York

By: /s/
Marilyn Bero, Director

/s/
Menzo D. Case, Director

/s/
Herbert R. Holden, Director

/s/
Bradford M. Jones, Director

/s/
Robert E. Kernan, Jr., Director

/s/
Gerald Macaluso, Director

/s/
Frank Nicchi, Director

/s/
August P. Sinicropi, Director

/s/
Vincent P. Sinicropi, Director

/s/
David Swenson, Director

OFFICE OF THRIFT SUPERVISION

By: /s/
Michael E. Finn
Regional Director, Northeast Region

Date: See Effective Date on page 1