



November 29, 2016

The Honorable Charles E. Schumer
Member, United States Senate
322 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Schumer,

We are writing you as Chairman and Vice Chairman of America's Mutual Banks (AMB) on behalf of our membership to congratulate you on your election to Senate Minority Leader and to applaud your recent statements regarding your willingness to work with the President-elect to find common ground. AMB is very pleased to have someone like yourself as the new Democratic leader in the Senate who is so experienced and well informed on financial and banking matters.

Given your vast experience in the House and Senate with financial regulation, we are writing to you to seek reassurance that your recent media statements regarding the Dodd-Frank Act do not preclude working with Republican members of Congress to deliver some relief to community banks.

America's Mutual Banks is a trade group formed for the purpose of advocating for solutions to problems unique to mutual savings institutions. We are composed of persons and institutions who are committed to the preservation and advancement of mutuality as a viable business model for FDIC depository institutions. AMB operates on the basis of inclusivity and represents the interests of mutuals regardless of their chartering authority, location or size. By reason of their mutual form of organization, mutual banks serve their members who are their customers. Our banks have no stockholders. No one can buy or sell a stake in mutual institutions. There is no temptation to swing for the fences to maximize profits. AMB members play a steady game and are risk adverse. They are located throughout the United States and are federally and state chartered. Some of the country's largest mutual banks are our members. Many of the largest mutual banks located in New York State are our members.

Because we are the only trade group that is exclusively devoted to issues affecting mutual banks, AMB is very focused on our representation. We do not as a rule undertake the resolution of

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issues which generally affect the banking industry unless there is a disparate impact on mutual banks. We are the only group that speaks exclusively for mutual banks. Unlike most industry-wide trade groups, we do not have multiple and sometimes conflicting interests of our members to promote and reconcile.

While all community banks are not mutually organized; by virtue of their small size, all mutual banks are community banks. Given the limitations of scale, our members have shouldered an unfair portion of the regulatory compliance burden that has resulted from the passage of the Dodd-Frank Act. In some ways, our members suffer from the unintended consequences of a struggle to reform big bank practices. AMB very much believes that community banks must have relief from these burdens and be shielded from collateral damage with efforts to reform big bank abuses if they are to remain viable and halt their declining market shares. Collectively, they are one of the few competitive alternatives to big banks for customers. Our views are not always the same as other and larger trade groups which have to serve a broader constituency.

AMB strongly encourages you to support regulatory relief for mutual community banks. We do not have any desire to become a pawn in a legislative battle over the repeal of the Dodd-Frank Act. We very much hope that small community bank relief will not be held hostage by a legislative struggle over Dodd-Frank. While Dodd-Frank has many beneficial qualities, like many statutes passed in the heat of a crisis, it is not perfect and can be improved. That effort can begin with the replacement of one size fits all with tailored regulation that recognizes the relatively low risk profile of mutual community banks.

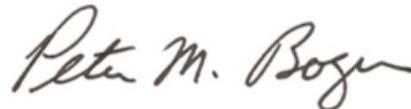
It is our sincere desire that the Congress recognizes that the law has had particularly deleterious effects on some aspects of community banking without providing commensurate benefits. We urge you to resist efforts to subsume relief for community banks into the overall consideration of the merits of repealing Dodd-Frank. Our members are not the problem but a solution to strengthening the economy and making sure customers are treated fairly. Our customers are our stakeholders and your constituents.

Sincerely



Charles J. Boulhier, III
Chairman, America's Mutual Banks

President & CEO, Ion Bank;
Naugatuck, CT



Peter M. Boger
Vice Chairman, America's Mutual Banks

Chairman & CEO, Ridgewood Savings
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