

# **PUBLIC DISCLOSURE**

March 6, 2017

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Adirondack Bank  
RSSD No. 101671

185 Genesee Street  
Utica, New York 13501

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'S CRA RATING: This institution is rated: Satisfactory.**  
**The Lending Test is rated: Satisfactory.**  
**The Community Development Test is rated: Outstanding.**

The major factors supporting the satisfactory performance rating for Adirondack Bank ("Adirondack" or "Bank") with regard to the Community Reinvestment Act ("CRA") include the following:

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

## **SCOPE OF EXAMINATION**

### **Procedures**

Adirondack was examined using the Federal Financial Institutions Examination Council's ("FFIEC") Interagency 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 area through its lending activities and a community development test, which evaluates the bank's responsiveness to community development needs in its assessment areas.

The full scope assessment areas were identified based on the significance of the bank's lending and deposit activities within those geographic areas as compared to the remaining assessment areas where limited scope reviews were conducted. MSA 46540 (Utica-Rome, NY) and the Non-

metropolitan Assessment Area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) held all of the bank’s deposits and 95% of the combined HMDA and small business loans. Adirondack’s performance in Metropolitan Statistical Area (“MSA”) 46540 (Utica-Rome, NY) received the most weight in determining the bank’s overall CRA rating because of the concentration of deposits, lending, population, and owner-occupied housing units in this area. The Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) was also evaluated as a full scope assessment area. The two limited scope assessment areas, MSA 45060 (Syracuse, NY) and Non-metropolitan Lewis County, NY, did not have a substantial effect on the overall rating. For details, see the Summary of Key Assessment Area Data.

As shown in the table below, the lending test evaluation covered the period from January 1, 2013 to December 31, 2015. The assessment period for Adirondack’s community development activities was from October 1, 2013 through December 31, 2016.

PERFORMANCE CRITERION	EVALUATION PERIOD
Loan-to-Deposit Ratio	January 1, 2013 – December 31, 2016
Lending in Assessment Areas	January 1, 2013 – December 31, 2015
Borrower Distribution of Loans	January 1, 2013 – December 31, 2015
Geographic Distribution Of Loans	January 1, 2013 – December 31, 2015
Response to CRA Complaints	January 1, 2013 – December 31, 2015
Community Development Lending	October 1, 2013 – December 31, 2016
Qualified Investments	October 1, 2013 – December 31, 2016
Community Development Services	October 1, 2013 – December 31, 2016

**Products**

Retail loan products evaluated include: home purchase, refinance, and home improvement loans reported under the Home Mortgage Disclosure Act (“HMDA”). Examiners verified the integrity of the loan data as part of the evaluation. Multifamily loans were excluded from the borrower and geographic distribution evaluations as the volume was too insignificant for analysis.

In addition, a sample of 155 small business loans and 186 consumer loans was selected for review. The loan samples were selected using the Board of Governors’ sampling procedures. Examiners also reviewed community development loans, qualified investments, and community development services.

**Lending Distribution Analysis**

The analyses of borrower and geographic distributions were based on the loans made in the assessment areas. To analyze the borrower characteristics of HMDA-related and consumer loans, the proportion of originations to low- and moderate-income (“LMI”) borrowers was

compared with the proportion of LMI families for HMDA loans and the proportion of LMI households for consumer loans. Income estimates from the U.S. Department of Housing and Urban Development (“HUD”) and the FFIEC were used to categorize borrower income. For small business loans, Adirondack’s percentage of loans to businesses with gross annual revenues (“GAR”) of \$1 million or less was compared to the percentage of all such businesses in the assessment areas as reported by Dun & Bradstreet (“D&B”). The size of the small business loan was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

To evaluate geographic distribution, the proportion of HMDA-related loan originations was compared to the proportion of owner-occupied housing units located in LMI geographies. For small business loans, the analysis compared the proportion of loan originations to the proportion of small businesses in LMI geographies as reported by D&B. For consumer loans, the proportion of originations in LMI geographies was compared to the proportion of households located in LMI geographies in the assessment areas.

Adirondack’s home purchase, refinance, and home improvement lending performance was also compared to the 2015 aggregate loan data of all HMDA-reporting lenders. Lending performance in 2013 and 2014 was evaluated for comparison to 2015 performance.

Peer data was used for the loan-to-deposit analysis. Similarly situated banks in upstate and central New York were selected based on the amount of deposits and number of branches. Adirondack’s loan-to-deposit performance was also compared to its national peer group. The bank’s performance in making community development loans and qualified investments was also compared with similarly-situated banks in the assessment areas.

### **Community Contacts**

In order to learn more about community credit needs, examiners conducted interviews with two non-profit organizations that are actively involved with affordable housing and community services in the assessment areas. Details from these interviews are presented within the performance context of the respective assessment areas in this evaluation.

### **DESCRIPTION OF INSTITUTION**

Adirondack, headquartered in Utica, NY, is a full-service commercial bank with 18 branches in northern and central New York State. The bank is a wholly-owned subsidiary of Adirondack Bancorporation, a bank holding company. The bank offers a variety of credit products to consumers and businesses. Consumer products include: residential mortgages (fixed and adjustable rate), automobile/recreational vehicle/watercraft loans, credit cards, home equity loans and lines of credit, and unsecured personal loans. Commercial products include: commercial

mortgages, term loans, lines of credit, construction loans, business credit cards, letters of credit, and loans to small businesses.

As of December 31, 2016, Adirondack had total assets of \$778 million, gross total loans and leases of \$473 million and total domestic deposits of \$659 million. The chart below shows the composition of Adirondack’s loan portfolio and trend as of December 31, 2016.

COMPOSITION OF LOAN PORTFOLIO		
Loan Type	12/31/2016	
	\$(000s)	Percent
Construction and Development	5,946	1.3
Secured by One to Four Family Dwellings	215,948	45.6
Other Real Estate - Multifamily	10,573	2.2
Other Real Estate - Nonfarm nonresidential	120,769	25.5
Commercial and Industrial	109,176	23.1
Loans to Individuals	10,924	2.3
All Other	0	0.0
<b>Total</b>	<b>473,336</b>	<b>100.0</b>

This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are not included in

Adirondack operates in a competitive market with branches of numerous local, regional, and national banks operating in the bank’s assessment areas. Local competitors include The Oneida Savings Bank, Bank of Utica, and NBT Bank N.A. Based on deposits reported to the Federal Deposit Insurance Corporation (“FDIC”) on June 30, 2016, Adirondack had the fourth largest deposit market share (13.9%) in the MSA 46540 (Utica-Rome, NY), the assessment area, where the bank conducted the majority of its business.

Adirondack’s previous CRA evaluation was conducted as of November 4, 2013, using the FFIEC’s Interagency Intermediate Small Institution Examination Procedures. The prior evaluation resulted in an overall rating of Satisfactory. There were no financial or legal factors that prevented Adirondack from fulfilling its responsibility under CRA.

**DESCRIPTION OF ASSESSMENT AREAS**

Adirondack had four assessment areas located in central and northern New York State. The assessment areas consisted of the following:

**Full Scope Assessment Areas**

- MSA 46540 (Utica-Rome, NY), consisting of Herkimer and Oneida Counties.
- Non-metropolitan assessment area, consisting of portions of Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties.

### **Limited Scope Assessment Areas**

- MSA 45060 (Syracuse, NY), consisting of portions of Onondaga and Madison Counties, including the City of Syracuse.
- Non-metropolitan Lewis County, NY, consisting of portions of Lewis County, NY

Adirondack's assessment area delineations had minor changes since the prior evaluation. In May of 2013, Adirondack expanded its Syracuse assessment area by adding eight census tracts in Madison County with the opening of the Sylvan Lake branch in adjacent Oneida County. Effective June 30, 2015, Adirondack closed its one branch in MSA 45060 (Syracuse, NY) and reopened it on July 6, 2015 as a loan production office. The assessment areas are in compliance with the requirements of Section 228.41 of Regulation BB and did not arbitrarily exclude LMI geographies. Additional assessment area data can be found in the Summary of Key Assessment Area Data table on the next page. See CRA Appendix B for maps illustrating the bank's assessment areas.

Summary of Key Assessment Area Data					
	MSA 46540 (Utica, NY)	Non-Metropolitan Assessment Area	MSA 45060 (Syracuse, NY)	Non-Metropolitan Lewis County	Totals
Total Population <sup>4</sup>	299,397	145,274	435,729	9,292	889,692
Population % of AA population	33.7%	16.3%	49.0%	1.0%	100.0%
Families	76,949	36,365	104,963	2,413	220,690
Families % of AA families	34.9%	16.5%	47.6%	1.1%	100.0%
Total Census Tracts <sup>4</sup>	93	41	132	3	269
Tracts % AA tracts	34.6%	15.2%	49.1%	1.1%	100.0%
LMI tracts	23	9	51	0	83
LMI tracts % all AA LMI tracts	27.7%	10.8%	61.4%	0.0%	100.0%
Total Owner-Occupied Units <sup>4</sup>	81,329	38,958	110,735	2,823	233,845
Units % of AA units	34.8%	16.7%	47.4%	1.2%	100.0%
Business Establishments <sup>5</sup>	10,717	6,180	20,234	288	37,419
Bus. est. % AA bus. est.	28.6%	16.5%	54.1%	0.8%	100.0%
Number of Branches <sup>1</sup>	14	4	0	0	18
Branches % all branches	77.8%	22.2%	0.0%	0.0%	100.0%
Branches in LMI tracts	0	0	0	0	0
LMI branches % AA LMI branches	0.0%	0.0%	0.0%	0.0%	0.0%
Branch Deposits (\$'000s) <sup>2</sup>	566,258	82,117	0	0	648,375
Deposits % AA deposits	87.3%	12.7%	0.0%	0.0%	100.0%
Deposit Market Share (%)/ Rank in Mkt.	13.85/4	1.82/9	0	0	
Home Purchase Originations <sup>3</sup>	427	40	17	2	486
HP originations % AA orig.	87.9%	8.2%	3.5%	0.4%	100.0%
Refinance Originations <sup>3</sup>	361	58	7	9	435
Refi orig. % AA orig.	83.0%	13.3%	1.6%	2.1%	100.0%
Home Improvement Originations <sup>3</sup>	517	52	8	10	587
Home Improvement orig. % AA orig.	88.1%	8.9%	1.4%	1.7%	100.0%
Small Business Originations <sup>3</sup>	115	4	25	0	144
SB orig. % AA orig.	79.9%	2.8%	17.4%	0.0%	100.0%
Consumer Originations <sup>3</sup>	147	13	4	3	167
Consumer orig. % AA orig.	88.0%	7.8%	2.4%	1.8%	100.0%
Combined Loan Totals	1,567	167	61	24	1,819
% of AA Orig.	86.1%	9.2%	3.4%	1.3%	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 and samples of small business for 2013 through 2015. (4) Demographic information was obtained from the 2010 Census. (5) Business establishments information was reported by D&B for 2015.



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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

Adirondack's overall record of meeting the credit needs of its assessment areas through lending performance was satisfactory. As described in more detail below, Adirondack originated a substantial majority of its loans within its assessment areas and its loan-to-deposit ratio was considered to be reasonable, as was the overall distribution of loans to borrowers of different incomes and businesses of different sizes. Geographic distribution of HMDA-related, and small business loans also represented reasonable penetration among geographies of different income levels.

#### Loan-to-Deposit Ratio

Adirondack's loan-to-deposit ratio was reasonable given the bank's size, financial condition, and the opportunities and the credit needs of its assessment area. Adirondack's average loan-to-deposit ratio for the sixteen quarters between January 1, 2013 and December 31, 2016 was 71.0%, based on information contained in Adirondack's December 31, 2016, Consolidated Report of Condition and Income. The bank's average loan-to-deposit ratio over the evaluation period was below the national peer average of 78.0% for similarly-sized banks and below an average of 75.0% for seven similarly-situated banks headquartered in upstate New York with branches in Adirondack's assessment areas. Adirondack maintained \$135.5 million in municipal deposits that were pledged as collateral, which adversely impacted the bank's loan-to-deposit ratio.

#### Lending in the Assessment Area

Adirondack originated a substantial majority of its loans, 95.4% by number and 94.4% by dollar amount, in its assessment areas over the evaluation period from January 1, 2013 through December 31, 2015. The Bank originated 96.3% of its HMDA-related loans, 89.8% of its consumer loans, and 92.9% of its small business loans by number within its assessment areas over the same period, as shown in the table on the following page.

<b>Lending Inside and Outside the Assessment Area January 1, 2013 – December 31, 2015</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$ (‘000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$ (‘000s)</b>	<b>%</b>
Home Purchase	486	96.2	69,829	95.4	19	3.8	3,367	4.6
Refinancing	435	95.2	55,734	93.1	22	4.8	4,104	6.9
Home Improvement	587	97.0	21,233	96.6	18	3.0	740	3.4
Multifamily Housing	9	100	3,059	100	0	0.0	0	0.0
<b>Total HMDA Related</b>	<b>1,517</b>	<b>96.3</b>	<b>149,855</b>	<b>94.8</b>	<b>59</b>	<b>3.7</b>	<b>8,211</b>	<b>5.2</b>
Consumer	167	89.8	4,190	91.6	19	10.2	386	8.4
Small Business	144	92.9	20,181	91.7	11	7.1	1,833	8.3
<b>All Loans</b>	<b>1,828</b>	<b>95.4</b>	<b>174,227</b>	<b>94.4</b>	<b>89</b>	<b>4.6</b>	<b>10,430</b>	<b>5.6</b>

### **Geographic Distribution of Loans**

Adirondack’s overall distribution of loans in geographies of different income levels, including LMI geographies was reasonable based on the evaluation of the bank’s lending penetration in MSA 46540 (Utica-Rome, NY) and in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY).

### **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

Adirondack’s overall lending penetration among borrowers of different income levels (including LMI individuals) and businesses of different sizes was reasonable based on the bank’s performance in both the MSA 46540 (Utica-Rome, NY) and the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). The proportion of originations to LMI borrowers was considered reasonable relative to the market aggregate and the percentage of LMI families for HMDA-related lending when considering performance context factors, such as housing affordability.

### **Response to Complaints**

Over the evaluation period, Adirondack received no complaints relating to its CRA performance. Since the previous evaluation, there were no CRA-related complaints filed with the Federal Reserve Bank of New York.

### **COMMUNITY DEVELOPMENT TEST**

Adirondack’s performance under the community development test was outstanding. Adirondack demonstrated excellent responsiveness to community development needs of its assessment areas through community development loans, qualified investments, and community development

services, given the Bank’s capacity and the need and availability of such opportunities in the Bank’s assessment areas.

During the evaluation period, Adirondack’s community development loans and qualified investments totaled \$47.2 million, comprised of approximately \$38.0 million in community development loans and \$9.2 million in qualified investments. Of the \$47.2 million, \$45.4 million, or 96.2%, represented new community development loans or qualified investments. The bank’s community development volume increased substantially from the \$16.8 million reported at the last evaluation. On an annualized basis, community development loans and qualified investments increased 137.5%.

Substantially all of Adirondack’s community development loans and qualified investments were made within the bank’s assessment areas, with the exception of one investment, totaling \$127,000 that was made to an organization that invests in affordable housing projects and economic development activities throughout the State of New York.

Adirondack’s community development program was responsive to community needs. In terms of the dollar amount, community services represented the majority of total activity at 50.9%, while affordable housing represented 5.3%, economic development represented 19.0% and revitalization and stabilization represented 24.8% of overall activity. Community contacts identified community services and affordable housing as critical needs throughout Adirondack’s assessment areas. See the chart below for details of the Bank’s total community development loans and qualified investments.

<b>Adirondack Bank</b>										
<b>October 1, 2013 - December 31, 2016</b>										
<b>Community Development Loans and Qualified Investments (combined)</b>										
<b>Assessment Areas</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize and Stabilize</b>		<b>Total</b>	
	<b>#</b>	<b>(\$000s)</b>	<b>#</b>	<b>(\$000s)</b>	<b>#</b>	<b>(\$000s)</b>	<b>#</b>	<b>(\$000s)</b>	<b>#</b>	<b>(\$000s)</b>
MSA 46540	12	1,647	112	23,961	31	8,033	24	7,942	179	41,583
Non-Metro AA	1	248	1	50	3	320	4	1,008	9	1,626
MSA 45060	1	600	0	0	4	475	4	2,745	9	3,820
Non-Metro Lewis Cty	0	0	0	0	0	0	0	0	0	0
Broader Statewide	0	0	0	0	1	127	0	0	1	127
<b>Total CD Loans and Qualified Investments</b>	<b>14</b>	<b>2,495</b>	<b>113</b>	<b>24,011</b>	<b>39</b>	<b>8,955</b>	<b>32</b>	<b>11,695</b>	<b>198</b>	<b>47,156</b>

*Lending activity includes new loans and investments made during the evaluation period, as well as investments with existing balances from the prior evaluation period that were outstanding as of 12/31/2016.*

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Adirondack was in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practice was identified as being inconsistent with helping to meet the credit needs of the assessment area.

## METROPOLITAN AREA

### FULL REVIEW

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 46540 (Utica-Rome, NY)

Adirondack's banking activities within its assessment areas were primarily conducted in MSA 46540 (Utica-Rome, NY). As of December 31, 2016, Adirondack operated 14 of its 18 branches (77.8%) in this MSA. These branches generated \$566.3 million in deposits, which accounted for 87.3% of the bank's total branch deposits as of June 30, 2016. Of the bank's 1,508 HMDA-related loans originated in the assessment areas during the evaluation period, 86.5% were originated in this assessment area. Of the sample of 144 small business loans originated in the assessment areas, 79.9% were originated in the MSA 46540 (Utica-Rome, NY) assessment area. For additional assessment area data, see the Summary of Key Assessment Area Data

Adirondack's market area is highly competitive with branches of local and regional banks operating in the assessment area. With a deposit market share of 13.9%, Adirondack was the 4<sup>th</sup> largest depository institution in the MSA. Primary bank competitors in this assessment area included Bank of Utica, Manufacturers and Traders Trust Company, Bank of America N.A., NBT Bank, N.A., and First Niagara Bank.

#### PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Bureau of Census ("2010 Census"), D&B, U.S. Department of Labor, HUD, New York State Association of Realtors ("NYSAR"), the New York State Department of Labor, and Observer-Dispatch newspaper.

##### Demographic Characteristics

The MSA 46540 (Utica-Rome, NY) assessment area consists of Herkimer County and Oneida County. According to the 2010 Census, the MSA 46540 (Utica-Rome, NY) assessment area had 93 census tracts, of which eight, or 8.6%, were low-income tracts and fifteen, or 16.1%, were moderate-income tracts. The majority of the LMI geographies in the assessment area were in the cities of Utica and Rome in Oneida County, which are located along the Erie Canal.

According to the 2010 Census, the assessment area had a population of 299,397, which represented a slight population decline of less than 1% since the 2000 Census. Oneida County, which includes both the cities of Utica and Rome, accounted for 78.5% of the area's population.

Utica has been recognized nationally as "The Town That Loves Refugees" by the United Nations Refugee Agency. According to an article published on February 27, 2017 by the Observer-Dispatch, a newspaper serving the cities of Utica and Rome, more than 16,000 people from

Vietnam, Russia, Bosnia, Somalia, Burma, Pakistan and Iraq have resettled in Utica in the past three decades. According to community contacts, refugee immigrants have settled in Utica for its centralized location, affordable real estate, transportation, and employment opportunities. A number of the immigrant population has been settling in the poorer neighborhoods of Utica. The influx of refugees has caused an increase in the need for community services, including financial education and translation services, and for affordable housing.

Income Characteristics

According to the 2010 Census, MSA 46540 (Utica-Rome, NY) had 76,949 families, of which 16,207 (21.1%) were low-income, 13,301 (17.3%) were moderate-income, and 10.3% lived below the poverty level. As shown in the table, the FFIEC-adjusted median family-income for MSA 46540 (Utica-Rome, NY) was \$63,000 in 2015, \$59,500 in 2014, and \$63,800 in 2013. These income levels were low in comparison to New York State’s 2015 FFIEC-adjusted median family income of \$72,000.

FFIEC MEDIAN FAMILY INCOMES			
Area	2013	2014	2015
MSA 46540	\$63,800	\$59,500	\$63,000

Housing Characteristics

The MSA 46540 (Utica-Rome, NY) assessment area had 137,268 housing units, of which 59.2% were owner-occupied, 27.0% were rental, and 13.8% were vacant, according to the 2010 Census. Of the total owner-occupied housing units, 11.7% were located in LMI census tracts. Demographic information from the 2010 Census estimated that the median age of the housing stock in MSA 46540 (Utica-Rome, NY) was 58 years.

Housing in the MSA 46540 (Utica-Rome, NY) was generally affordable, particularly in comparison to the state average median sales price as shown in the table to the right. Nonetheless, according to community contacts, affordable housing remained a pressing need in the area. Housing affordability remained difficult for LMI borrowers in the MSA. The median housing cost in the assessment area was about three to four times the median family income of a low-income borrower and two times the income of a moderate-income borrower. The contacts also indicated that there was a need for rehabilitation of housing in many parts of the City of Utica but the costs associated with rehabilitation were prohibitive especially for LMI individuals. Rents were relatively affordable in the MSA. The 2010 Census put median gross rent for the MSA at \$623, compared to median gross rent of \$1,061 for New York State.

MEDIAN HOUSING SALES PRICE			
County	2013	2014	2015
Oneida	\$115,000	\$117,000	\$119,000
Herkimer	\$106,000	\$104,000	\$95,000
New York State	\$226,500	\$225,000	\$230,000
Source: NYS Assoc. of Realtors			

Labor, Employment and Economic Characteristics

Formerly home to manufacturing and textile industries, long term economic trends in the MSA 46540 (Utica-Rome, NY) indicated an increase in employment in the educational service, health care and social service, and food service industries. However, community contacts noted that many of the service jobs were low paying and filled by the many refugees who make the region their home. As of 2015, there were 10,717 businesses operating in the assessment area, of which 4.3% were located in low-income census tracts, and 12.8% were situated in moderate-income census tracts. Of the total businesses operating in the assessment area, 90.6% were businesses with GAR of \$1 million or less.

As shown in the table to the right, the unemployment rates in the MSA showed an improving trend. The average annual unemployment rates for MSA 46540 (Utica-Rome, NY) declined from 7.5% in 2013 to 5.5% in 2015. Unemployment rates for the MSA remained slightly higher than the rates for the State of New York. Additional assessment area demographics can be found on the next page.

U.S. DEPARTMENT OF LABOR ANNUAL UNEMPLOYMENT RATES			
Area	2013	2014	2015
MSA 46540	7.5%	6.2%	5.5%
New York State	6.7%	5.5%	4.7%

Community Contacts

In order to learn more about community credit needs examiners conducted interviews with two community based organizations. The first contact was with a non-profit organization that works to address issues of affordable housing by providing home buyer, education, mortgage counseling, foreclosure prevention, community empowerment, and neighborhood revitalization primarily in Oneida, Herkimer, and Madison Counties. The contact identified housing rehabilitation services for the elderly, vacant and abandoned housing and a distressed economic outlook for the City of Utica as important issues within the community.

The second contact was with a community based church organization located in one of the poorer areas in the City of Utica. The organization offers multiple services to the community including educational programs, developing life skills for young people, and works to address the social, racial, and economic problems in the community. The contact identified housing and community services as important needs in the assessment area particularly with the large refugee population that is largely LMI. Additional information on Adirondack’s community development performance within MSA 46540 (Utica-Rome, NY) is available on the following page.

<b>Assessment Area Demographics</b>									
<b>Assessment Area : MSA 46540</b>									
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of</b>		<b>Families by Family Income</b>		
	#	%	#	%	#	%	#	%	
Low-income	8	8.6	4,597	6.0	1,932	42.0	16,207	21.1	
Moderate-income	15	16.1	9,515	12.4	2,036	21.4	13,301	17.3	
Middle-income	45	48.4	43,432	56.4	3,316	7.6	16,466	21.4	
Upper-income	19	20.4	19,396	25.2	659	3.4	30,975	40.3	
Unknown-income	6	6.5	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>93</b>	<b>100.0</b>	<b>76,949</b>	<b>100.0</b>	<b>7,943</b>	<b>10.3</b>	<b>76,949</b>	<b>100.0</b>	
	<b>Housing Units By Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%	
Low-income	9,625	2,362	2.9	24.5	5,668	58.9	1,595	16.6	
Moderate-income	20,173	7,182	8.8	35.6	10,033	49.7	2,958	14.7	
Middle-income	77,326	48,814	60.0	63.1	15,992	20.7	12,520	16.2	
Upper-income	30,011	22,962	28.2	76.5	5,256	17.5	1,793	6.0	
Unknown-income	133	0	0.0	6.8	71	53.4	0	39.8	
<b>Total Assessment Area</b>	<b>137,268</b>	<b>81,329</b>	<b>100.0</b>	<b>59.2</b>	<b>37,020</b>	<b>27.0</b>	<b>18,919</b>	<b>13.8</b>	
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
				<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#	%
Low-income	459	4.3	414	4.3	44	5.1	1	0.7	
Moderate-income	1,370	12.8	1,228	12.6	130	15.2	12	8.2	
Middle-income	5,914	55.2	5,388	55.5	423	49.3	103	70.5	
Upper-income	2,851	26.6	2,606	26.8	217	25.3	28	19.2	
Unknown-income	123	1.1	77	0.8	44	5.1	2	1.4	
<b>Total Assessment Area</b>	<b>10,717</b>	<b>100.0</b>	<b>9,713</b>	<b>100.0</b>	<b>858</b>	<b>100.0</b>	<b>146</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>90.6</b>		<b>8.0</b>		<b>1.4</b>	

Based on 2015 FFIEC Census Data. 2015 D&B Information

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 46540 (Utica-Rome, NY)

### LENDING TEST

The geographic distribution of lending and the penetration among individuals of different income levels and businesses of different sizes within MSA 46540 (Utica-Rome, NY) was considered reasonable. The greatest weight based on number and volume was given to HMDA lending followed by small business and consumer lending. In addition, Adirondack's lending performance was compared to the 2015 aggregate of all lenders required to report HMDA and small business data within the assessment area. Performance in 2013 and 2014 was compared to aggregate data for 2013 and 2014. Aggregate lending data was not available for consumer loans. See the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution



tables in CRA Appendix A for details on Adirondack's 2015, 2014 and 2013 loan distribution by geography, borrower income and business revenue size.

### **Geographic Distribution of Loans**

Adirondack's overall geographic distribution of loans reflects reasonable dispersion throughout the assessment area, including LMI census tracts. HMDA-related, small business and consumer lending performance was reasonable.

Opportunities to make HMDA-related loans and consumer loans in low-income census tracts were limited. According to the 2010 Census, of the 9,265 housing units in low-income census tracts, 24.5% were owner-occupied and 58.9% were rental units. Of the 81,329 owner-occupied units in the MSA 46540 (Utica-Rome, NY) assessment area, only 2.9% were located in low-income census tracts. According to the 2010 Census data, approximately 6.0% of families and 6.8% of all households resided in low-income tracts. Of the 4,597 families living in low-income census tracts, 1,932, or 42.0%, live below the poverty level.

Opportunities for lending in moderate-income census tracts were also limited. According to the 2010 Census, of the 20,173 housing units in moderate-income census tracts, 35.6% were owner-occupied and 49.7% were rental units. Of the 81,329 owner-occupied units in the MSA 46540 (Utica-Rome, NY) assessment area, only 8.8% were located in moderate-income census tracts. According to the 2010 Census data, approximately 12.4% of families and 14.6% of all households resided in moderate-income tracts. Of the 9,515 families living in moderate-income census tracts, 2,036, or 21.4%, live below the poverty level.

As shown in the table on the next page, during the evaluation period Adirondack originated HMDA-related, small business and consumer loans in a majority of the census tracts within the MSA 46540 (Utica-Rome, NY) assessment area. In 2013, Adirondack Bank extended loans in 97.7% of the total tracts in the assessment area. Overall penetration decreased in 2014 to 90.8% of all tracts and decreased again in 2013 to 85.1% of all tracts. In addition, there were some occurrences of low penetration during the evaluation period. In 2015, penetration in moderate-income tracts was only 53.3% of those census tracts with lending. Penetration was also limited in low-income census tracts in 2013 with only 50% of tracts with lending. In light of the performance context factors mentioned above, Adirondack's census tract penetration was reasonable overall.

<b>MSA 46540 (Utica-Rome, NY)</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2015</b>			
Low	8	2	75.0%
Moderate	15	7	53.3%
Middle	45	3	93.3%
Upper	19	1	94.7%
<b>Total Tracts</b>	<b>87</b>	<b>13</b>	<b>85.1%</b>
<b>2014</b>			
Low	8	1	87.5%
Moderate	15	3	80.0%
Middle	45	2	95.6%
Upper	19	2	89.5%
<b>Total Tracts</b>	<b>87</b>	<b>8</b>	<b>90.8%</b>
<b>2013</b>			
Low	8	4	50.0%
Moderate	15	1	93.3%
Middle	45	2	95.6%
Upper	19	2	89.5%
<b>Total Tracts</b>	<b>87</b>	<b>2</b>	<b>97.7%</b>

### *Home Purchase Loans*

Adirondack's overall home purchase performance was reasonable in LMI census tracts. Adirondack's home purchase lending performance in low-income census tracts was reasonable when considering performance context factors. In 2015, Adirondack originated 1.7% of its home purchase loans in low-income census tracts by number and 0.5% by dollar. This was below the demographic, which according to the 2010 Census, 2.9% of owner-occupied housing units were located in low-income census tracts. Performance was below the market aggregate, which in 2015 made 2.4% of its home purchase loans by number and 1.3% by dollar in low-income census tracts. Adirondack's performance in 2013 and 2014 was more favorable compared to 2015. In both years, lending exceeded demographics and was comparable to the market aggregate.

Adirondack's performance in moderate-income census tracts was reasonable when considering performance context factors. Adirondack originated 5.8% of its home purchase loans in moderate-income census tracts by number and 2.9% by dollar compared to the demographic of the 2010 Census, which indicated that 8.8% of owner-occupied housing units were located in moderate-income census tracts in the MSA. Adirondack's performance in moderate-income census tracts was below the market aggregate, which made 8.7% of its home purchase loans in moderate-income geographies by number and 5.5% by dollar in 2015. Home purchase lending

performance in moderate-income geographies in 2014 was comparable to performance in 2015, while 2013's performance was below 2015.

### *Refinance Loans*

Adirondack's overall refinance lending in LMI census tracts was reasonable. Adirondack's refinance lending performance in low-income census tracts was reasonable when considering performance context factors. Under the 2010 Census, 2.9% of owner-occupied housing units were in low-income census tracts, indicating limited lending opportunities. While Adirondack made only one refinance loan, or 1.1% by number and 0.6% by dollar volume, in low-income census tracts in 2015, the market aggregate made only 33, or 1.6% of its refinance loans by number and 0.8% by dollar in low-income census tracts in 2015. Adirondack did not make any refinance loans in low-income tracts in 2014, while in 2013 it was comparable to the market aggregate.

Adirondack's refinance lending performance in moderate-income census tracts was reasonable. In 2015, Adirondack originated 4.6% of its refinance loans in moderate-income census tracts by number and 2.2% by dollar amount compared to the demographic, which discloses that 8.8% of owner-occupied housing units were located in moderate-income census tracts in this MSA. Adirondack's performance was below the market aggregate which originated 7.2% of its refinance loans in moderate-income census tracts by number and 4.2% by dollar. Adirondack's 2014 refinance lending performance was comparable to 2015, while 2013's performance was more favorable.

### *Home Improvement Loans*

Adirondack's overall home improvement lending performance in LMI census tracts was reasonable. Adirondack's home improvement lending performance in low-income census tracts was considered reasonable given performance context factors. Under the 2010 Census, 2.9% of owner-occupied housing units were located in low-income census tracts. Adirondack made 2.7% of its home improvement loans in low-income census tracts by number and 1.6% by dollar. Adirondack's performance was below the market aggregate, which made 3.4% of its home improvement loans by number and 2.1% by dollar in low-income census tracts in 2015. Performance in 2014 was less favorable than 2015's performance while 2013's performance was more favorable.

Adirondack's home improvement lending performance in moderate-income census tracts was reasonable. Adirondack originated 4.0% of its home improvement loans by number and 0.6% by dollar in moderate-income census tracts in 2015 compared to the demographic of the 2010 Census, which indicated that 8.8% of owner-occupied housing units were located in moderate-income census tracts in this MSA. Adirondack's performance was below the market aggregate,

which originated 6.9% of its home improvement loans by number and 5.0% by dollar in moderate-income census tracts. Adirondack's 2014 home improvement lending performance was comparable to 2015's performance, while performance in 2013 exceeded demographic and market aggregate data.

### *Small Business Loans*

Adirondack's overall small business lending performance in LMI census tracts was reasonable. In 2015, Adirondack's small business performance was reasonable as the Bank made 6.0% of its small business loans in low-income census tracts by number and 13.3% by dollar compared to 4.3% of business establishments located in low-income census tracts. Adirondack's performance was above the market aggregate which had 4.6% of its small business loans by number and 3.1% by dollar in low-income census tracts. The Bank's performance in 2014 was comparable to its performance in 2015. Adirondack's 2013 performance was consistent with the market aggregate.

Adirondack's small business performance in moderate-income census tracts was poor in 2015, as Adirondack made 2 or 4.0% of its small business loans by number and 8.4% by dollar in moderate-income census tracts compared to 12.8% of business establishments located in moderate-income census tracts. Adirondack's performance in moderate-income census tracts was significantly below the market aggregate, which had 14.1% of its small business loans by number and 14.6% by dollar in moderate-income census tracts. Adirondack's performance in 2013 was comparable to performance in 2015, while performance in 2014 was more favorable.

### *Consumer Loans*

Adirondack's overall consumer lending performance in LMI geographies was poor. The Bank's consumer lending performance in low-income census tracts was poor as Adirondack made only 3.0% of its consumer loans by number and 0.7% by dollar volume in low-income census tracts, while 6.8% of all households reside in low-income census tracts. Adirondack's 2013 and 2014 consumer lending performance in low-income census tracts was also poor.

Adirondack's consumer lending performance in moderate-income census tracts was poor. Adirondack originated 7.6% of its consumer loans by number and 3.4% by dollar in moderate-income census tracts. Based on the 2010 Census, 14.6% of all households resided in moderate-income census tracts in this MSA. Adirondack's 2013 and 2014 consumer lending performance in moderate-income census tracts was also poor.

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

Adirondack's overall distribution of HMDA-related, consumer and small business loans in MSA 46540 (Utica-Rome, NY) reflected reasonable penetration among individuals of different income levels and businesses of different sizes. While housing was comparatively more affordable to moderate-income borrowers, housing costs were approximately three to four times the income of low-income borrowers.

### *Home Purchase Loans*

Adirondack's overall distribution of home purchase loans to LMI borrowers was reasonable based on poor distribution to low-income borrowers and reasonable distribution to moderate-income borrowers. In 2015, Adirondack made 6.7% of its home purchase loans by number and 2.3% by dollar to low-income borrowers, while 21.1% of the families in the MSA were of low income. Adirondack's performance was below the market aggregate, which made 9.6% of its home purchase loans to low-income borrowers by number and 5.3% by dollar. Adirondack's performance in 2013 and 2014 was also below both demographic and market aggregate data.

Performance for lending to moderate-income borrowers was reasonable. In 2015, 21.7% of Adirondack's home purchase loans by number and 16.0% by dollar were made to moderate-income borrowers, while 17.3% of families were of moderate-income. Adirondack's performance was below the market aggregate, which made 24.9% of its home purchase loans by number and 19.4% by dollar to moderate-income borrowers in 2015. Adirondack's 2013 and 2014 performance was comparable. Adirondack's lending activity by number to moderate-income borrowers was consistent with the demographics, which supports reasonable lending to moderate-income borrowers.

### *Refinance Loans*

Adirondack's overall distribution of refinance loans to LMI borrowers was reasonable. Adirondack's distribution of refinance loans to low-income borrowers was poor, as 3.4% of refinance loans by number and 0.8% by dollar were made to low-income borrowers, while 21.1% of all families were of low income. Adirondack's performance was below the market aggregate, which made 7.9% of its refinance loans to low-income borrowers by number and 4.3% by dollar. Adirondack's 2013 and 2014 performance was more favorable than its performance in 2015, as it was similar to the market aggregate but below demographic data.

Adirondack's distribution of refinance loans to moderate-income borrowers was reasonable, as 14.9% of refinance loans by number and 8.8% by dollar were made to moderate-income borrowers, compared to the 17.3% of all families were of moderate-income. Adirondack's performance was below the market aggregate, which made 17.8% of its refinance loans to

moderate-income borrowers by number and 12.8% by dollar. Adirondack's 2014 performance exceeded the demographic and was similar to the market aggregate, while 2013 lending was below both measures.

### *Home Improvement Loans*

Adirondack's overall distribution of home improvement loans to LMI borrowers was excellent. Adirondack's distribution to low-income borrowers was reasonable when the bank's performance was compared to the market aggregate. In 2015, Adirondack made 16.1% of its home improvement loans by number and 6.9% by dollar to low-income borrowers while 21.1% of the families were of low income. Adirondack's performance was similar to the market aggregate, which made 14.8% of its home improvement loans to low-income borrowers by number and 7.2% by dollar. Adirondack's 2013 and 2014 performance was comparable.

Performance in lending to moderate-income borrowers was excellent as 31.5% of Adirondack's home improvement loans were made to moderate-income borrowers by number and 16.7% by dollar while 17.3% of families were of moderate income. Adirondack's performance was above the market aggregate, which made 23.4% of its home improvement loans to moderate-income borrowers by number and 15.7% by dollar in 2015. Adirondack's 2013 and 2014 performance also exceeded demographic data and was similar to the market aggregate.

### *Small Business Loans*

The overall level of lending to small businesses was reasonable. During 2015, Adirondack made 72.0% of its small business loans by number and 46.4% by dollar to businesses with gross annual revenues of \$1 million or less, while 90.6% of business establishments had GAR of \$1 million or less. Performance was above the aggregate, which made 48.7% of its loans by number and 37.5% by dollar to businesses with GAR of \$1 million or less. Adirondack's 2013 and 2014 performance was comparable.

During 2015, 70.0% of Adirondack's loans by number were in amounts of \$100,000 or less. Adirondack's performance was below the aggregate, which originated 92.5% of its loans by number in amounts of \$100,000 or less. However, the aggregate included credit card lenders, which typically have smaller loan amounts. Performance in 2013 and 2014 was comparable.

### *Consumer Loans*

Adirondack's overall distribution of consumer loans to LMI borrowers was excellent based on reasonable distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2015, Adirondack made 10.6% of its consumer loans by number and 1.9% by dollar volume to low-income borrowers, while 24.6% of all households by number in the MSA were low-income. Adirondack's 2014 and 2013 performance exceeded its 2015 performance. In 2014, loan volume exceeded demographic data and, in 2013, while it was below demographic, the volume of lending to low-income borrowers was greater than that in 2015.

Performance in lending to moderate-income borrowers was excellent as 28.8% of Adirondack's consumer loans by number and 11.2% by dollar were made to moderate-income borrowers compared to 16.2% of all households in the MSA that were moderate-income. Adirondack's 2013 and 2014 performance was also excellent in that lending volume exceeded demographic data.

### **COMMUNITY DEVELOPMENT TEST**

Adirondack's community development performance in MSA 46540 (Utica-Rome, NY) demonstrated excellent responsiveness to the community development needs of the area. This assessment of performance considered Adirondack's capacity and the need and availability of opportunities for community development activities in MSA 46540 (Utica-Rome, NY).

Adirondack's community development loans and qualified investments targeting MSA 46540 (Utica-Rome, NY) totaled \$41.6 million or 88.2% of Adirondack's overall community development loans and qualified investments. New activities made during the evaluation period represented 97.7% of assessment area community development loans and qualified investments. On an annualized basis, Adirondack's community development loans and qualified investments made in this assessment area increased by 131.9%, compared to the prior evaluation.

Adirondack was responsive to credit needs in MSA 46540 (Utica-Rome, NY). Of the bank's total community development loans and qualified investments, 57.6%, in terms of dollar volume, targeted community service efforts. Communication with community contacts identified community services as a primary assessment area need, since the area had a limited number of community-based organizations providing services to LMI individuals.

### **Community Development Loans**

Adirondack made \$33.4 million in community development loans in MSA 46540 (Utica-Rome, NY). Of this total dollar amount of community development loans, 66.4% financed community service projects and 23.9% was for economic development and 4.9% for revitalization and stabilization of LMI geographies.

Examples of Adirondack's community development loans included:

- A \$500,000 line of credit for a not-for-profit organization that provided healthcare services to at risk youths and children.
- A \$3 million loan to a local telephone provider to finance business expansion. The business met small business investment company (SBIC) size eligibility standards. Expansion of the business also created jobs for low- and moderate-income workers.
- A \$500,000 line of credit to a not-for-profit organization for people with disabilities. The organization developed a park in a low-income area. Construction of the park was done in conjunction with local government and assisted in the revitalization of the low-income area.
- A \$122,000 working capital line of credit to an organization that provides long-term behavioral care for LMI and non-LMI youth, with moderate to severe mental health issues.

### **Community Development Investments**

Adirondack's qualified investments in MSA 46540 (Utica-Rome, NY) totaled \$8.2 million. In terms of dollar amount, 21.8% of the investments were dedicated to community services and 76.9% targeted revitalization and stabilization efforts in LMI geographies. A total of 88.5% of qualified investments represented new investments made since the prior CRA evaluation. Charitable donations to community development organizations totaled \$494,000.

Examples of qualified investments included:

- A total of \$1.4 million in bonds to four school districts in both Oneida and Herkimer Counties to purchase school busses for the districts. The majority of students in these four specific districts were low- or moderate-income as the majority of students received free or reduced rate lunches.
- A total of \$6.3 million in bonds for infrastructure repairs due to flooding. Federal Emergency Management Agency (FEMA) designated Oneida and Herkimer Counties as disaster areas in July of 2013 due to severe storms and flooding.
- Charitable donations totaling \$40 thousand to an organization in Rome, NY that provided food distribution and shelter to the homeless.

### **Community Development Services**

Adirondack provided a significant amount of community development services. During the 39-month evaluation period, Adirondack held 65 technical assistance, financial literacy, mortgage



education, or small business assistance sessions targeted to LMI individuals and small businesses. This was significantly higher than the 33 events held during the previous evaluation.

Additionally, Adirondack officers, directors, and employees served on boards or committees of 65 non-profit organizations located throughout this assessment area. Adirondack also developed ongoing partnerships with various community development organizations in order to gain knowledge of needs of the assessment area and improve the services the bank provides.

Adirondack operates 14 branches in MSA 46540 (Utica-Rome, NY), of which none were located in LMI census tracts.

Examples of community development services included:

- The President and Chief Executive Officer of the bank is chairman of a regional loan review committee of a statewide organization whose mission is to foster business development throughout the State of New York.
- A director of the bank serves as chairman of the finance and investment committees of an organization whose mission is to improve the lives of the residents of Oneida and Herkimer counties by creating innovative partnerships and investments designed to have a social impact. Examples include sponsoring a small business challenge to promote small business development in Utica and Rome, NY and providing training courses for leadership of non-profit organizations that teach leadership skills and capacity building. Most of these non-profits work with low- and moderate-income individuals.
- A Senior Vice President is chairman of a fund raising committee of a nonprofit organization whose mission is to revitalize neighborhoods through home ownership, housing rehabilitation and community empowerment.
- A Senior Vice President is a member of the Board of Directors and finance committee of an organization whose mission is to improve key sectors of the economy and improve the quality of life in the 14 counties that comprise the North Country Region of New York State.
- An Assistant Vice President taught financial fitness to low-income individuals for an organization dedicated to providing shelter and services to the homeless and lower-income individuals.

## NON-METROPOLITAN AREA

### *FULL REVIEW*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN ASSESSMENT AREA**

**(Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY)**

As of December 31, 2016, Adirondack operated four of its 18 branches (22.2 %) in the six counties that make up the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). Two full service branches were located in Franklin County, one in Essex County and one in Clinton County. These branches generated \$82.1 million in deposits, which accounts for 12.7% of the bank's total branch deposits, as of June 30, 2016. With a deposit market share of 1.8%, Adirondack was the 9<sup>th</sup> largest depository institution in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). Lead banks within this assessment area, in terms of deposit market share, included NBT Bank, National Association, Key Bank, National Association, Community Bank, National Association, and TD Bank, National Association.

Of the bank's 1,508 HMDA-related loans originated in the assessment areas during the evaluation period, 9.9% were originated in this assessment area. Of the sample of 144 small business loans, 2.8% were originated in this assessment area. For additional assessment area information, see Summary of Key Assessment Area Data.

#### **PERFORMANCE CONTEXT**

The following demographic and economic information was obtained from publicly available sources that included the 2010 Census, U.S. Department of Labor, HUD, NYSAR, and the New York State Department of Labor.

##### *Demographic Characteristics*

The Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) encompassed portions of six contiguous counties: Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery, located in central and northern New York State. According to the 2010 Census, the assessment area had a population of 145,274, representing a population increase of about 2.0% since the 2000 Census. These counties are primarily rural, with towns and villages scattered across the assessment area. According to the 2010 Census, the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) contained 41 census tracts, of which one, or 2.4%, was low-income and eight, or 19.5%, were moderate-income. Within the assessment area, two middle-income census tracts in Hamilton County met the FFIEC definition of distressed middle-income census tracts due to

population loss and also were underserved remote rural areas. Three census tracts in Franklin County were considered distressed middle-income census tracts due to high poverty rates.

Income Characteristics

According to the 2010 Census, the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) had 36,365 families, of which 20.0% were low-income, 17.9% were moderate-income, and 10.6% of families live below the poverty level. Approximately 2.0% of the families in the assessment area resided in low-income census tracts and 17.2% resided in moderate-income census tracts. The 2015 HUD-adjusted median family income for the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) ranged from a low of \$56,300 in Franklin County to a high of \$66,900 in Clinton County.

Housing Characteristics

The Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) had 76,039 housing units, of which 51.2% were owner-occupied, 24.0% were rental, and 24.8% were vacant, as of the 2010 Census. Only 1.1% of total owner-occupied housing units were in low-income census tracts and 13.3% were in the moderate-income census tracts. Owner-occupied housing units represented 29.7% and 39.9% of total housing units in low- and moderate-income census tracts respectively. The low level of owner-occupied housing in the one low-income census tracts represented a challenge to Adirondack in making HMDA-related lending in that geography.

<b>MEDIAN HOUSING SALES PRICE</b>		
<b>Area</b>	<b>2014</b>	<b>2015</b>
Clinton County	\$140,000	\$135,000
Essex County	\$160,000	\$158,900
Franklin County	\$100,000	\$101,760
Fulton County	\$112,500	\$112,000
Hamilton County	\$210,000	\$156,750
Montgomery County	Not Available	Not Available

Source NYS Association of Realtors

According to the New York State Association of Realtors, the median sales price of homes ranged from a low of \$100,000 in Franklin County in 2014 to a high of \$210,000 in Hamilton County in 2014. The table above includes additional detail on the median sales price of homes in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY).

In 2010, the median housing costs in the various counties comprising the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) ranged from three to five times the median family income of a low-income borrower, indicating that housing affordability may have been difficult for some low-income individuals.

Demographic information from the 2010 Census estimated the median age of the housing stock throughout the assessment area to be 55 years. According the National Association of Home Builders, aging housing stock signaled a need for home improvement and home rehabilitation loans as older structures normally require additional remodeling and renovations.

*Labor, Employment and Economic Characteristics*

As of 2015, there were 6,180 businesses operating in the assessment area, of which 1.7% were in low-income tracts and 17.8% were in moderate-income tracts. In 2015, unemployment rates in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) ranged from a low of 5.8% in Fulton County to a high of 6.9% in Hamilton County. Unemployment in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) was generally higher than New York State's annual rates of 5.3%.

According to New York State's Department of Labor's November 2016 newsletter, "Employment in New York State," the northern portion of New York State added 1,300 jobs since 2011, led by educational and health services and the leisure and hospitality industries. The table on the following page includes additional detail on the demographics of the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY).

<b>Assessment Area Demographics</b>								
<b>Non-metropolitan Assessment Area</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	#	%	#	%	#	%	#	%
Low-income	1	2.4	730	2.0	331	45.3	7,269	20.0
Moderate-income	8	19.5	6,259	17.2	1,167	18.6	6,513	17.9
Middle-income	22	53.7	20,140	55.4	1,925	9.6	7,223	19.9
Upper-income	9	22.0	9,214	25.3	420	4.6	15,360	42.2
Unknown-income	1	2.4	22	0.1	22	100.0	0	0.0
<b>Total Assessment Area</b>	<b>41</b>	<b>100.0</b>	<b>36,365</b>	<b>100.0</b>	<b>3,865</b>	<b>10.6</b>	<b>36,365</b>	<b>100.0</b>
	<b>Housing Units By Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	1,443	428	1.1	29.7	837	58.0	178	12.3
Moderate-income	13,027	5,193	13.3	39.9	6,150	47.2	1,684	12.9
Middle-income	42,804	22,591	58.0	52.8	7,567	17.7	12,646	29.5
Upper-income	18,743	10,746	27.6	57.3	3,642	19.4	4,355	23.2
Unknown-income	22	0	0.0	0.0	22	100.0	0	0.0
<b>Total Assessment Area</b>	<b>76,039</b>	<b>38,958</b>	<b>100.0</b>	<b>51.2</b>	<b>18,218</b>	<b>24.0</b>	<b>18,863</b>	<b>24.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	104	1.7	86	1.5	18	3.8	0	0.0
Moderate-income	1,103	17.8	977	17.5	118	24.8	8	6.8
Middle-income	3,180	51.5	2,894	51.8	203	42.6	83	70.9
Upper-income	1,779	28.8	1,621	29.0	132	27.7	26	22.2
Unknown-income	14	0.2	9	0.2	5	1.1	2	0.0
<b>Total Assessment Area</b>	<b>6,180</b>	<b>100.0</b>	<b>5,587</b>	<b>100.0</b>	<b>476</b>	<b>100.0</b>	<b>117</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.4</b>		<b>7.7</b>		<b>1.9</b>

Based on 2015 FFIEC Census Data. 2015 D&B Information

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN ASSESSMENT AREA (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery, Counties, NY)**

**LENDING TEST**

Lending performance in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) was considered reasonable based on Adirondack’s performance relative to the geographic distribution of lending and the penetration among individuals of different income levels and businesses of different sizes. The evaluation was based on the number and volume of HMDA-related lending. Small business and consumer loan distribution was not evaluated as lending volume in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) was insufficient to

make a meaningful analysis. In addition, Adirondack's lending performance was compared to the 2015 aggregate of all lenders required to report HMDA data within the assessment area. Performance in 2013 and 2014 was compared to aggregate data for 2013 and 2014. See the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details on Adirondack's 2015, 2014 and 2013 loan distribution by borrower income and business revenue size.

### **Geographic Distribution of Loans**

Adirondack's overall geographic distribution of HMDA-related loans reflected poor dispersion throughout the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). According to the 2010 Census, the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) had one low-income tract, with a limited number of owner-occupied housing units, and 45.3% of all families residing in that tract had incomes below the poverty level. As such, the analysis of the lending distribution throughout the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) was based on lending performance in moderate-income census tracts.

During 2015, Adirondack originated loans in only 45.0% of the census tracts within the assessment area. Performance was slightly better in 2013 at 52.5% but in 2014, performance was only 35.0% penetration. Loan penetration was poor in low-, moderate-, and middle-income census tracts. Penetration was weak do to the rural nature of the assessment area with only four branches located in three of the six counties comprising the assessment area. In Clinton County, where there were four moderate-income census tracts, owner-occupancy was less than 50% in three of the four moderate-income census tracts. In Fulton County, where there were no branch locations, only 428 owner-occupied units were located in the one low-income census tract in that county. The number of owner-occupied units in the two moderate-income census tracts in Fulton County was also limited with 1,349 units. Penetration was also poor in one of the two distressed and underserved middle-income census tracts in Hamilton County. Hamilton County did not have any lending during the evaluation period nor was there a branch presence. Penetration in Clinton, Essex and Franklin counties, where Adirondack had a branch presence, was slightly better in 2015 and 2013 with 50.0% of the moderate-income census reporting lending.

Based on performance context challenges, opportunities to originate loans in LMI tracts were limited. The table below details the bank's penetration of low-, moderate-, middle-, and upper-income census tracts.

Non-metropolitan Assessment Area			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2015</b>			
Low	1	1	0.0%
Moderate	8	5	37.5%
Middle	22	13	40.9%
Upper	9	3	66.7%
Total Tracts	40	22	45.0%
<b>2014</b>			
Low	1	1	0.0%
Moderate	8	8	0.0%
Middle	22	14	36.4%
Upper	9	3	66.7%
Total Tracts	40	26	35.0%
<b>2013</b>			
Low	1	1	0.0%
Moderate	8	6	25.0%
Middle	22	11	50.0%
Upper	9	1	88.9%
Total Tracts	40	19	52.5%

### *Home Purchase Loans*

Adirondack’s overall home purchase lending distribution was poor. Adirondack did not originate any home purchase loans in moderate-income census tracts in 2014 or 2015 and originated only one in 2013. According to the 2010 Census, 13.3% of owner-occupied housing units were located in moderate-income census tracts in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). Performance was below the market aggregate, which in 2015, made 13.1%, of its home purchase loans by number and 8.9% by dollar volume in moderate-income census tracts. Performance was also below the market aggregate in 2014 and 2013.

### *Refinance Loans*

Refinance lending performance was poor. In 2014 and 2015, the bank did not make any refinance loans in moderate-income census tracts. Adirondack’s 2013’s performance was more favorable as Adirondack made three refinance loans in moderate-income census tracts. Performance was below the demographic which represents that 13.3% of all owner-occupied housing units were in moderate-income census tracts. Performance was also below the market

aggregate for all three years. In 2015, the aggregate originated refinance loans at 12.7% by number and 8.4% by dollar volume in moderate-income census tracts.

### *Home Improvement Loans*

Home Improvement performance was poor overall based on poor performance in 2013 and 2014, as the bank did not make any home improvement loans in moderate-income census tracts. Performance in 2015 was reasonable as 21.4% by number and 6.8% by dollar volume of home improvement lending was in moderate-income census tracts. Performance for 2015 was above the demographic, which indicates 13.3% of owner-occupied housing units were in moderate-income census tracts. Performance for 2015 was also above the market aggregate, which made 11.6% by number and 5.6% by dollar volume in moderate-income census tracts.

### **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

Lending performance in the assessment area relating to borrower distribution was reasonable overall, and reflected reasonable penetration among individuals of all income levels (including LMI) and businesses of different sizes. While housing was generally affordable to moderate-income borrowers in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY), housing costs were approximately three to five times the income of low-income borrowers. In addition, 20.0% of the families in the assessment area were low-income. Greater weight was given to Adirondack's performance relative to moderate-income borrowers based on performance context considerations that support that lending opportunities to low-income borrowers were limited.

### *Home Purchase Loans*

Adirondack's overall distribution of home purchase loans to LMI borrowers was poor based on comparisons to demographic and market aggregate data. In 2015, Adirondack made one loan, which accounted for 8.3% of its home purchase loans by number and 1.4% by dollar to low-income borrowers, while 20.0% of the families in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) were of low income. Adirondack's performance was above the market aggregate, which made 4.5% of its home purchase loans to low-income borrowers by number and 2.0% by dollar. Opportunities for lending to low-income borrowers was limited as the aggregate made only 63 home purchase loans to low-income borrowers. Adirondack's performance in 2013 and 2014 was below that of 2015, as the bank did not make any home purchase loans to low-income borrowers.

Performance in lending to moderate-income borrowers in 2015 was also poor as Adirondack made one loan, which accounted for 8.3% of its home purchase loans by number and 7.1% by



dollar to moderate-income borrowers while 17.9% of families in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) were of moderate-income. Adirondack's performance was below the market aggregate, which made 17.7% of its home purchase loans by number and 10.9% by dollar to moderate-income borrowers in 2015. Adirondack's 2014 performance exceeded both demographics and the market aggregate, while performance in 2013's was comparable to that of 2015.

### *Refinance Loans*

Adirondack's overall distribution of refinance loans to LMI borrowers was reasonable based on comparisons to demographic and market aggregate data. Adirondack's distribution of refinance loans to low-income borrowers was poor as the bank did not make any refinance loans to low-income borrowers in 2015, while 20.0% of all families in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) were of low income. The market aggregate made 4.2% of its refinance loans to low-income borrowers by number and 2.1% by dollar. Opportunities for refinance lending were limited as only 24 refinance loans were made to low-income borrowers by the aggregate in 2015. Refinance performance in 2013 and 2014 was also poor.

Adirondack's distribution of refinance loans to moderate-income borrowers was reasonable. In 2015, 27.3% of refinance loans by number and 13.3% by dollar were made to moderate-income borrowers compared to the 17.9% of all families in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) that were of moderate-income. Adirondack's performance was above the market aggregate, which made 17.4% of its refinance loans to moderate-income borrowers by number and 11.8% by dollar. Adirondack's 2013 and 2014 performance was below both demographic and market aggregate data.

### *Home Improvement Loans*

Adirondack's overall distribution of home improvement loans to LMI borrowers was reasonable based on poor distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2015, Adirondack made 14.3% of its home improvement loans by number and 2.1% by dollar to low-income borrowers, while 20.0% of the families in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) were of low income. Adirondack's performance was similar to the market aggregate, which also made 14.0% of its home improvement loans to low-income borrowers by number and 4.6% by dollar. In 2014, Adirondack made 5.0% of its home improvement loans by number and 0.6% by dollar to low-income borrowers compared to the market aggregate, which made 10.8% of its home improvement loans to low-income borrowers by number and 4.5% by dollar. Adirondack's performance in 2013 was similar to that of 2014.

Performance in home improvement lending to moderate-income borrowers was excellent. In 2015, 21.4% of Adirondack's home improvement loans were made to moderate-income borrowers by number and 9.6% by dollar, while 17.9% of families were of moderate income. Adirondack's performance was below the market aggregate, which made 24.6% of its home improvement loans to moderate-income borrowers by number and 12.0% by dollar in 2015. In 2014, Adirondack made 25.0% of its home improvement loans by number and 29.1% by dollar to moderate-income borrowers compared to the market aggregate, which made 20.8% of its home improvement loans to moderate-income borrowers by number and 12.5% by dollar. Adirondack's performance in 2013 exceeded that of 2014.

## **COMMUNITY DEVELOPMENT TEST**

Adirondack's community development performance in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) demonstrated adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments and services. This assessment of Adirondack's performance considered the bank's capacity and the need and availability of such opportunities in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY).

The bank's overall community development loan and investment activity in the Non-metropolitan Assessment Area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) totaled \$1.6 million. In addition, the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY) also benefited from a \$127,000 investment in a non-profit corporation that promotes economic development throughout New York State. Of this total dollar amount of community development loans and qualified investments, 61.9% financed revitalization and stabilization efforts of designated disaster areas, 19.7% was for economic development activities, 15.3% targeted affordable housing and 3.1% was for community service projects. Community development investment activity included \$2,000 in charitable grants and donations. All of the community development loans and qualified investments was new activity made during the evaluation period.

### **Community Development Loans**

Adirondack made a total of \$618,000 in community development loans in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY).

Examples of community development loans included:

- A \$100,000 line of credit to a Community Development Corporation (CDC) that promotes business activity in 14 counties of upstate New York. The CDC also offers a microloan program through the SBA microloan grant program.
- A \$50,000 term loan to a company that provides ambulance services for a largely LMI population. The majority of revenues were through Medicaid.
- A \$248,000 multi-family loan to purchase a six unit apartment building located in a moderate-income census tract in Plattsburg, N.Y. All rents were affordable to LMI individuals.

### **Qualified Investments**

Adirondack made a total of \$1 million in qualified investments in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). All of the qualified investments represented new commitments originated since the prior CRA evaluation. All qualified investments were bonds for infrastructure repairs in distressed middle-income census tracts.

### **Community Development Services**

In terms of community development services, Adirondack provided an adequate amount of community development services in the Non-metropolitan assessment area (Clinton, Essex, Franklin, Fulton, Hamilton, and Montgomery Counties, NY). During the 39-month evaluation period, Adirondack held 22 technical assistance, financial literacy, mortgage education, and small business assistance sessions targeted to LMI individuals and small businesses.

Adirondack officers, directors, and employees served on boards or committees of 5 non-profit organizations located throughout its assessment areas.

Adirondack operates four branches in the Non-metropolitan assessment area, of which none were located in LMI census tracts.

Examples of community development services included:

- One officer that was treasurer of a non-profit organization that promotes economic development and tourism in the Adirondack region of New York State.
- One officer was the treasurer and fundraiser for a non-profit organization that targets economic revitalization, social responsibility, and environmental balance in the northern parts of New York State.

## METROPOLITAN AREA

### LIMITED REVIEW

#### DESCRIPTION OF INSTITUTION’S OPERATIONS IN MSA 45060 (SYRACUSE, NY)

A limited evaluation of Adirondack’s performance in MSA 45060 (Syracuse, NY) was completed. According to the 2010 Census, Syracuse had 49.0% of the population of Adirondack’s assessment areas and according to 2015 D&B information 54.0% of all business establishments. Key demographic highlights are listed below:

Assessment Area Demographics – MSA 45060 (Syracuse, NY)				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	25	17.9	4.4	21.4
Moderate Income	27	19.3	13.5	16.4
Middle Income	46	32.9	41.2	21.0
Upper Income	41	29.3	40.9	41.2
Unknown	1	0.7	0.0	0.0
<b>Total</b>	<b>140</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Adirondack had 3.0% of its lending activity in this assessment area during the evaluation period. Adirondack closed its one branch in the assessment area effective June 30, 2015 and reopened the location as a loan production office on July 6, 2015.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 45060 (SYRACUSE, NY)

Adirondack’s performance in MSA 45060 (Syracuse, NY) was not consistent with its overall performance in New York State, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Community Development Test
MSA 45060 (Syracuse, NY)	Below	Consistent

During the evaluation period, Adirondack’s performance under the lending test was below its overall reasonable performance under the lending test. Adirondack made 32 HMDA-related

loans in MSA 45060 (Syracuse, NY), representing 2.1% of HMDA originations made in all the assessment areas. During the evaluation period, the bank originated 3 or 9.4% of its HMDA-related loans in LMI census tracts, compared to 17.9% of owner-occupied housing units located in LMI geographies. Additionally, Adirondack made 25 small business loans in this assessment area, representing 17.4% of the bank's total small business originations. Thirty six percent (9) of the small business loans were originated in LMI census tracts, which exceeded the demographics 31.0% of small businesses located in LMI census tracts.

Adirondack's performance was consistent with its outstanding performance under the Community Development Test. Adirondack made \$3.8 million in community development loans and qualified investments dedicated to MSA 45060 (Syracuse, NY), representing 8.1% of the bank's total community development loans and qualified investments. Of the \$3.8 million, 71.9% targeted revitalization of LMI areas, 15.7% targeted affordable housing and 12.4% targeted economic development.

## NON-METROPOLITAN AREA

### LIMITED REVIEW

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN LEWIS COUNTY, NY

A limited evaluation of Adirondack's performance in the Non-metropolitan Lewis County, NY was completed. According to the 2010 Census, Non-metropolitan Lewis County, NY had 1.0% of the population of Adirondack's assessment areas and according to 2015 D&B information, 0.8% of all business establishments. Key demographic highlights are listed below:

Assessment Area Demographics – NON-METROPOLITAN Lewis County, NY				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	23.6
Moderate Income	0	0.0	0.0	22.5
Middle Income	3	100.0	100.0	21.8
Upper Income	0	0.0	0.0	32.1
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period, Adirondack had 1.3% of its lending activity in this assessment area and did not maintain any branches.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN LEWIS COUNTY, NY

Adirondack's performance in Non-metropolitan Lewis County, NY was not consistent with its overall performance in New York State, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Community Development Test
NON-METROPOLITAN Lewis County, NY	Consistent	Below

During the evaluation period, Adirondack's performance under the lending test was consistent with the bank's reasonable performance. The bank made 21 HMDA-related loans in Lewis

County, NY, representing 1.3% of HMDA originations made in all the assessment areas over the three year evaluation period. Adirondack did not make any small business loans in this assessment area over the evaluation period. In 2015, the bank made 3 of 8 or 37.5% of its HMDA-related loans to LMI borrowers while 46.0% of all families were LMI indicating reasonable performance. Geographic distribution performance was not evaluated as all census tracts were middle-income.

Performance under the Community Development Test was not consistent with the overall outstanding performance as Adirondack did not make any of its community development loans and qualified investments in this assessment area.

CRA APPENDIX A

LENDING TABLES

2015 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 46540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	2	1.7%	0.5%	2.4%	1.3%	8	6.7%	2.3%	9.6%	5.3%
Moderate	7	5.8%	2.9%	8.7%	5.5%	26	21.7%	16.0%	24.9%	19.4%
Middle	67	55.8%	57.2%	57.3%	54.0%	19	15.8%	14.7%	23.3%	23.5%
Upper	44	36.7%	39.4%	31.5%	39.2%	66	55.0%	66.2%	27.2%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.8%	0.8%	15.0%	12.9%
<b>Total</b>	<b>120</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>120</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	1.1%	0.6%	1.6%	0.8%	3	3.4%	0.8%	7.9%	4.3%
Moderate	4	4.6%	2.2%	7.2%	4.2%	13	14.9%	8.8%	17.8%	12.8%
Middle	51	58.6%	60.4%	60.3%	59.4%	24	27.6%	17.5%	23.9%	20.8%
Upper	31	35.6%	36.9%	30.9%	35.7%	43	49.4%	65.1%	42.9%	51.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	4.6%	7.8%	7.5%	10.7%
<b>Total</b>	<b>87</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>87</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	4	2.7%	1.6%	3.4%	2.1%	24	16.1%	6.9%	14.8%	7.2%
Moderate	6	4.0%	0.6%	6.9%	5.0%	47	31.5%	16.7%	23.4%	15.7%
Middle	105	70.5%	51.3%	64.1%	58.3%	32	21.5%	23.8%	24.9%	21.6%
Upper	34	22.8%	46.5%	25.6%	34.5%	43	28.9%	52.3%	35.2%	53.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.0%	0.3%	1.7%	2.3%
<b>Total</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	1	50.0%	6.5%	28.0%	3.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	93.5%	40.0%	19.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	32.0%	76.6%	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%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	8	2.2%	0.7%	2.4%	1.2%	35	9.8%	2.3%	10.1%	4.9%
Moderate	17	4.7%	2.3%	7.8%	4.8%	86	24.0%	13.2%	22.1%	16.3%
Middle	224	62.6%	58.0%	59.7%	55.2%	75	20.9%	16.7%	23.7%	21.8%
Upper	109	30.4%	39.0%	30.1%	38.7%	152	42.5%	63.3%	34.1%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	2.8%	4.4%	10.0%	14.0%
<b>Total</b>	<b>358</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>358</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	3		6.0%		13.3%		4.6%		3.1%	
Moderate	2		4.0%		8.4%		14.1%		14.6%	
Middle	30		60.0%		59.7%		51.3%		52.6%	
Upper	15		30.0%		18.6%		25.7%		25.4%	
Unknown	0		0.0%		0.0%		1.8%		3.4%	
Tract Unknown	0		0.0%		0.0%		2.6%		0.8%	
<b>Total</b>	<b>50</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	
<b>By Revenue</b>										
\$1 Million or Less	36		72.0%		46.4%		48.7%		37.5%	
<b>By Loan Size</b>										
\$100,000 or less	35		70.0%		20.4%		92.5%		34.1%	
\$100,001-\$250,000	6		12.0%		15.1%		3.9%		16.7%	
\$250,001-\$1 Million	9		18.0%		64.5%		3.6%		49.2%	
<b>Total</b>	<b>50</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	

Originations and Purchases



### Consumer Loan Distribution Table

Assessment Area/Group : MSA 46540 - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	2	3.0%	15	0.7%	7	10.6%	40	1.9%
Moderate	5	7.6%	70	3.4%	19	28.8%	229	11.2%
Low/Moderate Total	7	10.6%	85	4.1%	26	39.4%	269	13.1%
Middle	46	69.7%	863	42.0%	14	21.2%	305	14.8%
Upper	13	19.7%	1,107	53.9%	19	28.8%	1,266	61.6%
Unknown	0	0.0%	0	0.0%	7	10.6%	215	10.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66	100.0%	2,055	100.0%	66	100.0%	2,055	100.0%

**2015 Aggregate Comparison Loan Distribution Table**  
Non-metropolitan Assessment Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.1%	0.5%	1	8.3%	1.4%	4.5%	2.0%
Moderate	0	0.0%	0.0%	13.1%	8.9%	1	8.3%	7.1%	17.7%	10.9%
Middle	5	41.7%	31.4%	51.8%	50.4%	3	25.0%	24.6%	24.3%	20.4%
Upper	7	58.3%	68.6%	34.0%	40.2%	7	58.3%	66.9%	35.7%	51.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.8%	15.2%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.9%	0.5%	0	0.0%	0.0%	4.2%	2.1%
Moderate	0	0.0%	0.0%	12.7%	8.4%	3	27.3%	13.3%	17.4%	11.8%
Middle	6	54.5%	63.6%	52.4%	50.8%	1	9.1%	2.7%	18.4%	14.9%
Upper	5	45.5%	36.4%	34.0%	40.4%	7	63.6%	84.0%	39.1%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	21.0%	21.6%
<b>Total</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	1.0%	1.0%	2	14.3%	2.1%	14.0%	4.6%
Moderate	3	21.4%	6.8%	11.6%	5.6%	3	21.4%	9.6%	24.6%	12.0%
Middle	6	42.9%	41.9%	60.8%	55.2%	3	21.4%	24.3%	21.4%	20.4%
Upper	5	35.7%	51.3%	26.6%	38.2%	6	42.9%	64.0%	37.9%	59.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.0%	3.3%
<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	44.4%	43.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	22.2%	5.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	50.8%	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%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	1.0%	0.5%	3	8.1%	0.9%	6.0%	2.1%
Moderate	3	8.1%	0.9%	12.9%	9.5%	7	18.9%	10.1%	18.8%	10.9%
Middle	17	45.9%	46.5%	53.4%	49.6%	7	18.9%	15.2%	22.3%	18.5%
Upper	17	45.9%	52.6%	32.7%	40.4%	20	54.1%	73.8%	36.7%	50.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.2%	18.4%
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	2.1%	1.4%			
Moderate	0	0.0%	0.0%	0.0%	0.0%	18.4%	23.3%			
Middle	1	50.0%	48.4%	48.4%	48.9%	42.3%				
Upper	1	50.0%	51.6%	51.6%	30.5%	33.1%				
Unknown	0	0.0%	0.0%	0.0%	0.1%	0.0%				
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%				
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	2	100.0%	100.0%	100.0%	44.7%	37.2%				
<b>By Loan Size</b>										
\$100,000 or less	0	0.0%	0.0%	0.0%	93.1%	41.5%				
\$100,001-\$250,000	2	100.0%	100.0%	100.0%	4.0%	19.9%				
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	2.9%	38.6%				
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

### Consumer Loan Distribution Table

Non-Metropolitan Assessment Area - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	1	25.0%	18	12.7%
Moderate	0	0.0%	0	0.0%	1	25.0%	22	15.2%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	41	27.9%
Middle	4	100.0%	146	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	25.0%	100	68.7%
Unknown	0	0.0%	0	0.0%	1	25.0%	5	3.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	146	100.0%	4	100.0%	146	100.0%

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 45060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	3.0%	1.8%	0	0.0%	0.0%	9.6%	5.4%
Moderate	0	0.0%	0.0%	13.9%	8.4%	0	0.0%	0.0%	22.2%	16.9%
Middle	4	44.4%	58.3%	34.7%	31.5%	0	0.0%	0.0%	22.1%	21.5%
Upper	5	55.6%	41.7%	48.3%	58.3%	8	88.9%	93.8%	28.7%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	11.1%	6.2%	17.5%	15.9%
<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>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	2.9%	1.6%	0	0.0%	0.0%	7.5%	4.1%
Moderate	0	0.0%	0.0%	10.3%	6.7%	0	0.0%	0.0%	15.8%	10.6%
Middle	2	66.7%	71.1%	36.1%	31.9%	0	0.0%	0.0%	23.4%	19.3%
Upper	1	33.3%	28.9%	50.8%	59.9%	2	66.7%	85.4%	35.9%	46.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	14.6%	17.4%	19.4%
<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>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	3.8%	1.5%	0	0.0%	0.0%	12.9%	5.0%
Moderate	0	0.0%	0.0%	16.3%	9.0%	0	0.0%	0.0%	21.9%	12.8%
Middle	0	0.0%	0.0%	40.3%	38.0%	0	0.0%	0.0%	24.8%	21.3%
Upper	0	0.0%	0.0%	39.6%	51.6%	0	0.0%	0.0%	37.7%	56.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	4.3%
<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>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	22.7%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.2%	8.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	31.8%	59.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	27.3%	21.2%	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>
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	3.2%	3.0%	0	0.0%	0.0%	9.4%	4.4%
Moderate	0	0.0%	0.0%	13.3%	8.1%	0	0.0%	0.0%	20.4%	13.2%
Middle	6	50.0%	61.0%	35.7%	35.4%	0	0.0%	0.0%	22.6%	18.1%
Upper	6	50.0%	39.0%	47.9%	53.5%	10	83.3%	92.0%	31.4%	36.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	8.0%	16.1%	27.5%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank			Aggregate					
		%	% \$(000s)	%	%	% \$(000s)				
Low	3	23.1%	36.8%	14.8%	17.7%					
Moderate	3	23.1%	24.0%	12.1%	13.9%					
Middle	4	30.8%	25.8%	38.1%	39.6%					
Upper	3	23.1%	13.4%	35.0%	28.8%					
Unknown	0	0.0%	0.0%	0.1%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%					
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
	<b>By Revenue</b>									
\$1 Million or Less	13	100.0%	100.0%	43.0%	28.5%					
	<b>By Loan Size</b>									
\$100,000 or less	7	53.8%	15.3%	91.5%	28.5%					
\$100,001-\$250,000	4	30.8%	36.0%	3.7%	14.0%					
\$250,001-\$1 Million	2	15.4%	48.7%	4.8%	57.6%					
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

**Consumer Loan Distribution Table**

Assessment Area/Group : MSA 45060 - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	2	100.0%	0	0.0%	0	0.0%
Low/Moderate Total	1	100.0%	2	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	2	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	2	100.0%	1	100.0%	2	100.0%

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non-Metropolitan Lewis County

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.0%	4.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	24.7%	19.4%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	14.6%	13.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	40.4%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.2%	12.6%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.4%	2.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	16.0%	13.8%	9.5%
Middle	4	100.0%	100.0%	100.0%	100.0%	1	25.0%	5.5%	32.8%	24.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	78.5%	44.8%	55.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.2%	8.5%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	17.4%	18.7%	9.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	29.7%	18.6%
Middle	4	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	22.0%	16.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	82.6%	28.6%	54.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.1%	0.8%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	25.0%	3.0%	11.3%	4.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	13.3%	23.9%	16.0%
Middle	8	100.0%	100.0%	100.0%	100.0%	1	12.5%	4.5%	21.8%	17.3%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	50.0%	79.2%	37.0%	52.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.9%	9.7%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Bank % \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	0	0.0%	0.0%	0.0%	0.0%					
Middle	0	0.0%	0.0%	100.0%	100.0%					
Upper	0	0.0%	0.0%	0.0%	0.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%					
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	0	0.0%	0.0%	0.0%	0.0%	51.5%	57.6%			
<b>By Loan Size</b>										
\$100,000 or less	0	0.0%	0.0%	0.0%	0.0%	96.1%	73.3%			
\$100,001-\$250,000	0	0.0%	0.0%	0.0%	0.0%	3.9%	26.7%			
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>			

Originations and Purchases

### Consumer Loan Distribution Table

Non-Metropolitan Lewis County - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	1	100.0%	7	100.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	7	100.0%
Middle	1	100.0%	7	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	7	100.0%	1	100.0%	7	100.0%

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 46540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	5	3.4%	1.0%	3.4%	1.8%	4	2.7%	1.2%	8.2%	4.6%
Moderate	10	6.8%	4.2%	8.9%	5.7%	20	13.6%	7.2%	23.3%	17.5%
Middle	82	55.8%	57.4%	56.2%	53.4%	33	22.4%	17.3%	23.4%	22.5%
Upper	50	34.0%	37.5%	31.5%	39.1%	88	59.9%	73.6%	31.6%	44.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.4%	0.7%	13.6%	11.1%
<b>Total</b>	<b>147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.8%	0.9%	5	5.8%	2.6%	6.1%	3.4%
Moderate	5	5.8%	2.7%	7.3%	4.5%	16	18.6%	12.2%	20.4%	14.2%
Middle	56	65.1%	66.9%	59.0%	56.6%	21	24.4%	18.9%	25.1%	22.3%
Upper	25	29.1%	30.4%	31.9%	38.0%	44	51.2%	66.3%	40.2%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.2%	10.5%
<b>Total</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	2	1.1%	0.5%	2.6%	1.3%	29	16.6%	6.4%	10.5%	5.1%
Moderate	10	5.7%	3.4%	6.2%	3.2%	34	19.4%	8.5%	20.3%	12.5%
Middle	130	74.3%	60.3%	64.8%	62.3%	42	24.0%	13.7%	26.9%	23.5%
Upper	33	18.9%	35.7%	26.3%	33.2%	63	36.0%	63.4%	40.2%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	4.0%	7.9%	2.1%	3.0%
<b>Total</b>	<b>175</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>175</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	4.3%	0.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	39.1%	32.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	34.8%	62.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	21.7%	5.1%	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%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	7	1.7%	0.6%	2.8%	1.4%	38	9.3%	2.4%	7.9%	4.0%
Moderate	26	6.4%	7.0%	8.0%	6.5%	70	17.1%	8.5%	21.7%	15.3%
Middle	268	65.5%	58.4%	58.6%	55.3%	96	23.5%	16.5%	24.5%	21.4%
Upper	108	26.4%	34.0%	30.6%	36.7%	195	47.7%	67.4%	35.8%	44.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	2.4%	5.2%	10.1%	14.9%
<b>Total</b>	<b>409</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>409</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	2	6.1%	13.5%	4.4%	2.8%					
Moderate	4	12.1%	18.4%	13.5%	13.3%					
Middle	16	48.5%	40.6%	51.0%	53.1%					
Upper	11	33.3%	27.5%	27.1%	27.1%					
Unknown	0	0.0%	0.0%	1.3%	2.7%					
Tract Unknown	0	0.0%	0.0%	2.6%	0.8%					
<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	28	84.8%	81.2%	43.7%	37.1%					
<b>By Loan Size</b>										
\$100,000 or less	24	72.7%	23.6%	92.7%	37.3%					
\$100,001-\$250,000	5	15.2%	17.9%	4.3%	20.9%					
\$250,001-\$1 Million	4	12.1%	58.6%	3.0%	41.8%					
<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases



### Consumer Loan Distribution Table

Assessment Area/Group : MSA 46540 - 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	12	27.3%	53	6.7%
Moderate	2	4.5%	70	8.9%	9	20.5%	89	11.4%
Low/Moderate Total	2	4.5%	70	8.9%	21	47.7%	142	18.2%
Middle	28	63.6%	228	29.2%	10	22.7%	159	20.4%
Upper	14	31.8%	482	61.8%	13	29.5%	480	61.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	780	100.0%	44	100.0%	780	100.0%

**2014 Aggregate Comparison Loan Distribution Table**  
Non-metropolitan Assessment Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.6%	0.3%	0	0.0%	0.0%	6.1%	2.6%
Moderate	0	0.0%	0.0%	12.7%	8.3%	2	20.0%	15.1%	17.8%	11.9%
Middle	6	60.0%	43.0%	50.2%	48.2%	3	30.0%	28.9%	22.4%	19.4%
Upper	4	40.0%	57.0%	36.6%	43.1%	5	50.0%	56.0%	40.1%	54.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.6%	11.5%
<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.5%	0.8%	0	0.0%	0.0%	5.8%	3.4%
Moderate	0	0.0%	0.0%	9.8%	6.4%	1	11.1%	6.4%	12.7%	8.1%
Middle	4	44.4%	56.2%	55.4%	52.2%	3	33.3%	25.2%	24.9%	20.4%
Upper	5	55.6%	43.8%	33.4%	40.7%	5	55.6%	68.4%	39.9%	46.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.7%	21.2%
<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.0%	0.6%	10.8%	4.5%
Moderate	0	0.0%	0.0%	12.4%	8.1%	5	25.0%	29.1%	20.8%	12.5%
Middle	10	50.0%	47.6%	54.6%	51.0%	6	30.0%	23.8%	27.3%	26.0%
Upper	10	50.0%	52.4%	33.0%	41.0%	8	40.0%	46.5%	37.3%	53.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	3.9%
<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	25.0%	21.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	75.0%	78.9%	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%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.7%	0.4%	1	2.6%	0.2%	6.8%	2.9%
Moderate	0	0.0%	0.0%	11.9%	7.8%	8	20.5%	15.6%	17.0%	10.9%
Middle	20	51.3%	49.0%	52.1%	49.2%	12	30.8%	26.2%	23.8%	19.8%
Upper	19	48.7%	51.0%	35.3%	42.6%	18	46.2%	58.0%	39.6%	52.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.9%	14.2%
<b>Total</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	0	0.0%	0.0%	0.0%	0.0%	2.5%	0.0%	2.3%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	19.1%	0.0%	24.8%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	47.7%	0.0%	38.3%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	30.7%	0.0%	34.5%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	0	0.0%	0.0%	0.0%	0.0%	39.4%	0.0%	29.1%	0.0%	0.0%
<b>By Loan Size</b>										
\$100,000 or less	0	0.0%	0.0%	0.0%	0.0%	92.0%	0.0%	33.6%	0.0%	0.0%
\$100,001-\$250,000	0	0.0%	0.0%	0.0%	0.0%	4.7%	0.0%	21.9%	0.0%	0.0%
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	0.0%	3.2%	0.0%	44.5%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>

Originations and Purchases

### Consumer Loan Distribution Table

Non-Metropolitan Assessment Area - 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	14.3%	8	3.8%
Low/Moderate Total	0	0.0%	0	0.0%	1	14.3%	8	3.8%
Middle	1	14.3%	14	6.5%	3	42.9%	84	38.3%
Upper	6	85.7%	204	93.5%	3	42.9%	127	58.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	218	100.0%	7	100.0%	218	100.0%

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 45060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	1	33.3%	21.6%	3.2%	1.9%	0	0.0%	0.0%	8.7%	4.8%
Moderate	0	0.0%	0.0%	14.2%	9.0%	0	0.0%	0.0%	23.4%	17.7%
Middle	0	0.0%	0.0%	35.3%	31.7%	1	33.3%	46.5%	23.0%	21.9%
Upper	2	66.7%	78.4%	47.2%	57.4%	2	66.7%	53.5%	30.0%	43.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.9%	12.4%
<i>Total</i>	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
<b>Refinance</b>										
Low	0	0.0%	0.0%	2.8%	1.5%	0	0.0%	0.0%	8.5%	4.5%
Moderate	0	0.0%	0.0%	13.0%	9.1%	1	33.3%	27.9%	18.7%	13.9%
Middle	1	33.3%	27.9%	36.7%	33.6%	1	33.3%	33.6%	23.2%	21.2%
Upper	2	66.7%	72.1%	47.5%	55.8%	1	33.3%	38.5%	33.6%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.1%	17.8%
<i>Total</i>	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	4.2%	2.3%	0	0.0%	0.0%	11.7%	5.2%
Moderate	0	0.0%	0.0%	15.6%	14.0%	2	50.0%	57.9%	23.3%	14.9%
Middle	2	50.0%	57.9%	38.9%	34.1%	1	25.0%	14.0%	26.4%	21.7%
Upper	2	50.0%	42.1%	41.3%	49.5%	1	25.0%	28.1%	34.8%	48.5%
Unknown	0	0.0%	0.0%	0.1%	0.0%	0	0.0%	0.0%	3.8%	9.7%
<i>Total</i>	4	100.0%	100.0%	100.0%	100.0%	4	100.0%	100.0%	100.0%	100.0%
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	21.1%	4.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	92.0%	13.2%	25.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	8.0%	52.6%	57.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.2%	13.1%	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>	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
<b>HMDA Totals</b>										
Low	1	8.3%	6.1%	3.3%	2.0%	0	0.0%	0.0%	9.0%	4.3%
Moderate	1	8.3%	38.6%	14.1%	10.7%	3	25.0%	9.4%	22.2%	15.1%
Middle	4	33.3%	12.7%	36.2%	34.6%	3	25.0%	22.4%	23.4%	19.7%
Upper	6	50.0%	42.5%	46.3%	52.6%	4	33.3%	26.2%	31.4%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	42.0%	14.0%	21.7%
<i>Total</i>	12	100.0%	100.0%	100.0%	100.0%	12	100.0%	100.0%	100.0%	100.0%
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank		Aggregate			Bank		Aggregate	
		%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	1	16.7%	3.2%	14.8%	16.9%					
Moderate	0	0.0%	0.0%	12.2%	14.1%					
Middle	3	50.0%	33.2%	37.2%	39.7%					
Upper	2	33.3%	63.5%	35.6%	29.3%					
Unknown	0	0.0%	0.0%	0.1%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%					
<i>Total</i>	6	100.0%	100.0%	100.0%	100.0%					
<b>By Revenue</b>										
\$1 Million or Less	6	100.0%	100.0%	37.2%	27.6%					
<b>By Loan Size</b>										
\$100,000 or less	2	33.3%	7.4%	90.8%	25.0%					
\$100,001-\$250,000	1	16.7%	9.7%	3.9%	14.5%					
\$250,001-\$1 Million	3	50.0%	82.9%	5.3%	60.5%					
<i>Total</i>	6	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

### Consumer Loan Distribution Table

Assessment Area/Group : MSA 45060 - 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	9	100.0%	1	100.0%	9	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	9	100.0%	1	100.0%	9	100.0%

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non-Metropolitan Lewis County

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.2%	2.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	25.0%	18.4%
Middle	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	19.8%	19.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	36.5%	46.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.5%	13.6%
<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>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.0%	1.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	31.4%	21.8%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	19.6%	15.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	45.1%	58.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.0%	2.5%
<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>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.0%	3.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	28.1%	25.0%	17.0%
Middle	3	100.0%	100.0%	100.0%	100.0%	1	33.3%	25.0%	26.1%	27.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	46.9%	30.7%	52.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.1%	0.2%
<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>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.9%	2.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	9.4%	26.4%	19.0%
Middle	4	100.0%	100.0%	100.0%	100.0%	1	25.0%	8.3%	22.1%	19.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	82.3%	36.2%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	8.8%
<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>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank		Aggregate						
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Moderate	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Middle	0	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%	0.0%	0.0%	
Upper	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0.0%</i>	<i>0.0%</i>	
<b>By Revenue</b>										
\$1 Million or Less	0	0.0%	0.0%	0.0%	0.0%	42.2%	42.2%	47.6%	47.6%	
<b>By Loan Size</b>										
\$100,000 or less	0	0.0%	0.0%	0.0%	0.0%	96.7%	96.7%	74.1%	74.1%	
\$100,001-\$250,000	0	0.0%	0.0%	0.0%	0.0%	2.2%	2.2%	11.1%	11.1%	
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	0.0%	1.1%	1.1%	14.8%	14.8%	
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations and Purchases

### Consumer Loan Distribution Table

Non-Metropolitan Assessment Area Lewis County - 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	7	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	7	100.0%
Middle	1	100.0%	7	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	7	100.0%	1	100.0%	7	100.0%

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 46540

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	5	3.1%	0.8%	2.3%	1.2%	13	8.1%	3.4%	11.2%	6.8%
Moderate	5	3.1%	2.4%	9.5%	6.0%	30	18.8%	12.9%	28.2%	23.2%
Middle	105	65.6%	67.7%	58.1%	55.6%	42	26.3%	20.8%	22.4%	22.8%
Upper	45	28.1%	29.1%	30.1%	37.1%	73	45.6%	60.8%	23.8%	35.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.3%	2.1%	14.4%	12.1%
<b>Total</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	3	1.6%	0.9%	1.4%	0.6%	14	7.4%	3.3%	7.0%	2.8%
Moderate	14	7.4%	4.2%	7.4%	3.1%	23	12.2%	7.3%	18.5%	8.9%
Middle	111	59.0%	53.8%	56.5%	54.5%	53	28.2%	21.6%	27.2%	16.9%
Upper	60	31.9%	41.1%	34.6%	41.8%	90	47.9%	64.4%	39.5%	33.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	4.3%	3.4%	7.8%	38.3%
<b>Total</b>	<b>188</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>188</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	6	3.1%	0.5%	3.7%	1.8%	32	16.6%	6.9%	15.3%	7.6%
Moderate	22	11.4%	19.8%	9.4%	10.2%	39	20.2%	11.5%	23.7%	16.1%
Middle	126	65.3%	54.9%	60.4%	55.5%	50	25.9%	20.4%	25.5%	20.8%
Upper	39	20.2%	24.8%	26.6%	32.4%	64	33.2%	44.7%	34.2%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	4.1%	16.5%	1.3%	5.4%
<b>Total</b>	<b>193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	5.3%	0.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	36.8%	19.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	53.1%	42.1%	43.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	50.0%	46.9%	15.8%	36.1%	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%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	14	2.6%	0.8%	2.2%	0.9%	59	10.9%	3.9%	10.0%	4.5%
Moderate	41	7.6%	5.7%	8.7%	5.1%	92	16.9%	10.3%	23.3%	14.6%
Middle	343	63.2%	60.0%	57.7%	54.6%	145	26.7%	21.0%	24.9%	18.9%
Upper	145	26.7%	33.6%	31.4%	39.4%	227	41.8%	59.8%	32.1%	33.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	3.7%	5.1%	9.7%	28.3%
<b>Total</b>	<b>543</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>543</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	1	3.1%	1.4%	3.2%	1.8%					
Moderate	2	6.3%	25.4%	14.3%	13.7%					
Middle	17	53.1%	46.0%	50.4%	48.9%					
Upper	10	31.3%	20.8%	27.6%	29.2%					
Unknown	2	6.3%	6.4%	1.4%	5.1%					
Tract Unknown	0	0.0%	0.0%	3.1%	1.2%					
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	23	71.9%	48.7%	43.1%	36.3%					
	<b>By Loan Size</b>									
\$100,000 or less	22	68.8%	29.4%	93.0%	36.4%					
\$100,001-\$250,000	7	21.9%	32.3%	3.9%	18.1%					
\$250,001-\$1 Million	3	9.4%	38.2%	3.1%	45.5%					
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases



### Consumer Loan Distribution Table

Assessment Area/Group : MSA 46540 - 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	1	2.7%	7	0.7%	7	18.9%	32	3.5%
Moderate	3	8.1%	23	2.5%	11	29.7%	218	23.6%
Low/Moderate Total	4	10.8%	30	3.2%	18	48.6%	250	27.1%
Middle	21	56.8%	462	49.9%	8	21.6%	267	28.9%
Upper	12	32.4%	433	46.9%	11	29.7%	407	44.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	924	100.0%	37	100.0%	924	100.0%

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non-Metropolitan Assessment Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	1.4%	0.7%	0	0.0%	0.0%	4.0%	1.8%
Moderate	1	5.6%	3.2%	12.0%	8.0%	1	5.6%	1.1%	19.7%	12.5%
Middle	9	50.0%	46.7%	52.7%	48.3%	4	22.2%	18.0%	24.5%	21.3%
Upper	8	44.4%	50.1%	33.9%	43.0%	13	72.2%	80.9%	38.9%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.0%	9.3%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.0%	0.3%	1	2.6%	2.4%	5.0%	1.3%
Moderate	3	7.9%	7.0%	11.9%	4.1%	4	10.5%	4.8%	11.7%	3.7%
Middle	16	42.1%	41.2%	52.9%	77.7%	7	18.4%	14.3%	20.8%	7.9%
Upper	19	50.0%	51.7%	34.2%	17.9%	26	68.4%	78.5%	48.5%	28.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.0%	58.7%
<b>Total</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.9%	0.9%	1	5.6%	0.4%	10.1%	3.0%
Moderate	0	0.0%	0.0%	16.2%	9.4%	7	38.9%	34.8%	21.6%	13.6%
Middle	10	55.6%	72.4%	56.8%	52.0%	4	22.2%	27.5%	25.2%	19.8%
Upper	8	44.4%	27.6%	26.1%	37.7%	6	33.3%	37.2%	40.1%	58.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	5.1%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	4.3%	1.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	13.0%	15.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	47.8%	53.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	34.8%	29.6%	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%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	1.2%	0.5%	2	2.7%	1.4%	5.3%	1.6%
Moderate	4	5.4%	5.1%	12.6%	5.8%	12	16.2%	6.0%	16.7%	7.2%
Middle	35	47.3%	45.7%	53.4%	65.8%	15	20.3%	16.6%	23.0%	13.1%
Upper	35	47.3%	49.2%	32.8%	27.9%	45	60.8%	76.0%	42.5%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.5%	39.3%
<b>Total</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		1.8%	0.7%				
Moderate	0	0.0%	0.0%		18.6%	23.4%				
Middle	0	0.0%	0.0%		50.7%	42.0%				
Upper	2	100.0%	100.0%		28.8%	33.5%				
Unknown	0	0.0%	0.0%		0.1%	0.5%				
Tract Unknown	0	0.0%	0.0%		0.0%	0.0%				
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	2	100.0%	100.0%		44.0%	43.3%				
<b>By Loan Size</b>										
\$100,000 or less	2	100.0%	100.0%		91.2%	33.1%				
\$100,001-\$250,000	0	0.0%	0.0%		4.8%	20.2%				
\$250,001-\$1 Million	0	0.0%	0.0%		4.0%	46.8%				
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

### Consumer Loan Distribution Table

Non-Metropolitan Assessment Area - 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	3	13.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	3	13.0%
Middle	2	100.0%	23	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	20	87.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	23	100.0%	2	100.0%	23	100.0%

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 45060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	2.5%	1.4%	0	0.0%	0.0%	8.5%	4.7%
Moderate	2	40.0%	19.8%	15.0%	9.7%	1	20.0%	12.1%	22.9%	17.2%
Middle	0	0.0%	0.0%	36.5%	32.7%	1	20.0%	7.7%	22.6%	21.1%
Upper	3	60.0%	80.2%	46.1%	56.1%	3	60.0%	80.2%	30.5%	43.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.5%	13.3%
<i>Total</i>	5	100.0%	100.0%	100.0%	100.0%	5	100.0%	100.0%	100.0%	100.0%
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.5%	0.6%	0	0.0%	0.0%	6.4%	2.6%
Moderate	0	0.0%	0.0%	9.5%	4.8%	0	0.0%	0.0%	15.6%	8.0%
Middle	0	0.0%	0.0%	34.2%	45.9%	0	0.0%	0.0%	23.4%	15.3%
Upper	1	100.0%	100.0%	54.7%	48.7%	1	100.0%	100.0%	42.4%	40.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.1%	33.7%
<i>Total</i>	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	5.6%	3.3%	0	0.0%	0.0%	8.9%	3.4%
Moderate	0	0.0%	0.0%	15.6%	9.9%	0	0.0%	0.0%	22.1%	15.5%
Middle	4	100.0%	100.0%	34.8%	29.6%	1	25.0%	5.0%	26.8%	25.5%
Upper	0	0.0%	0.0%	43.9%	57.2%	3	75.0%	95.0%	40.4%	50.7%
Unknown	0	0.0%	0.0%	0.1%	0.0%	0	0.0%	0.0%	1.9%	4.9%
<i>Total</i>	4	100.0%	100.0%	100.0%	100.0%	4	100.0%	100.0%	100.0%	100.0%
<b>Multi-Family</b>										
Low	1	50.0%	52.4%	38.2%	9.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	47.6%	14.5%	5.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	25.5%	26.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	21.8%	59.8%	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>	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
<b>HMDA Totals</b>										
Low	1	8.3%	16.3%	2.6%	2.0%	0	0.0%	0.0%	7.7%	3.3%
Moderate	3	25.0%	23.8%	12.9%	7.2%	1	8.3%	5.5%	19.9%	11.4%
Middle	4	33.3%	5.9%	35.4%	37.2%	2	16.7%	3.8%	23.2%	16.4%
Upper	4	33.3%	54.1%	49.1%	53.6%	7	58.3%	59.7%	36.0%	37.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	31.0%	13.2%	31.3%
<i>Total</i>	12	100.0%	100.0%	100.0%	100.0%	12	100.0%	100.0%	100.0%	100.0%
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	1	16.7%	31.2%		16.4%	21.1%				
Moderate	1	16.7%	15.6%		12.3%	10.8%				
Middle	3	50.0%	13.1%		37.6%	41.1%				
Upper	1	16.7%	40.1%		33.7%	27.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		0.0%	0.0%				
<i>Total</i>	6	100.0%	100.0%		100.0%	100.0%				
<b>By Revenue</b>										
\$1 Million or Less	4	66.7%	94.2%		38.0%	28.2%				
<b>By Loan Size</b>										
\$100,000 or less	2	33.3%	5.8%		90.2%	24.4%				
\$100,001-\$250,000	1	16.7%	7.3%		4.2%	15.1%				
\$250,001-\$1 Million	3	50.0%	86.9%		5.6%	60.5%				
<i>Total</i>	6	100.0%	100.0%		100.0%	100.0%				

Originations and Purchases

### Consumer Loan Distribution Table

Assessment Area/Group : MSA 45060 - 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	8	51.7%	1	50.0%	8	48.3%
Upper	1	50.0%	8	48.3%	1	50.0%	8	51.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	16	100.0%	2	100.0%	16	100.0%

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non-Metropolitan Lewis County

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.6%	2.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.0%	11.2%
Middle	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	14.8%	11.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	49.2%	61.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.5%	12.7%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	8.4%	6.7%	4.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	36.5%	22.7%	20.6%
Middle	5	100.0%	100.0%	100.0%	100.0%	1	20.0%	11.9%	24.0%	19.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	43.3%	41.3%	48.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.3%	7.2%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.2%	5.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	66.7%	38.5%	31.9%	12.8%
Middle	3	100.0%	100.0%	100.0%	100.0%	1	33.3%	61.5%	24.2%	22.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	28.6%	56.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	2.2%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	1	11.1%	5.6%	9.3%	3.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	33.3%	29.5%	25.1%	15.4%
Middle	9	100.0%	100.0%	100.0%	100.0%	2	22.2%	16.1%	21.6%	16.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	33.3%	48.8%	38.3%	55.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.7%	8.9%
<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>By Revenue</b>									
\$1 Million or Less	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	46.2%	42.8%	42.8%
	<b>By Loan Size</b>									
\$100,000 or less	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	90.8%	38.4%	38.4%
\$100,001-\$250,000	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	7.7%	31.2%	31.2%
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	1.5%	30.4%	30.4%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

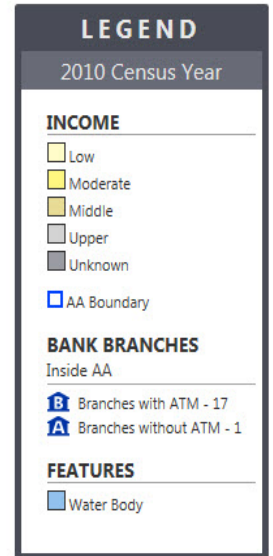
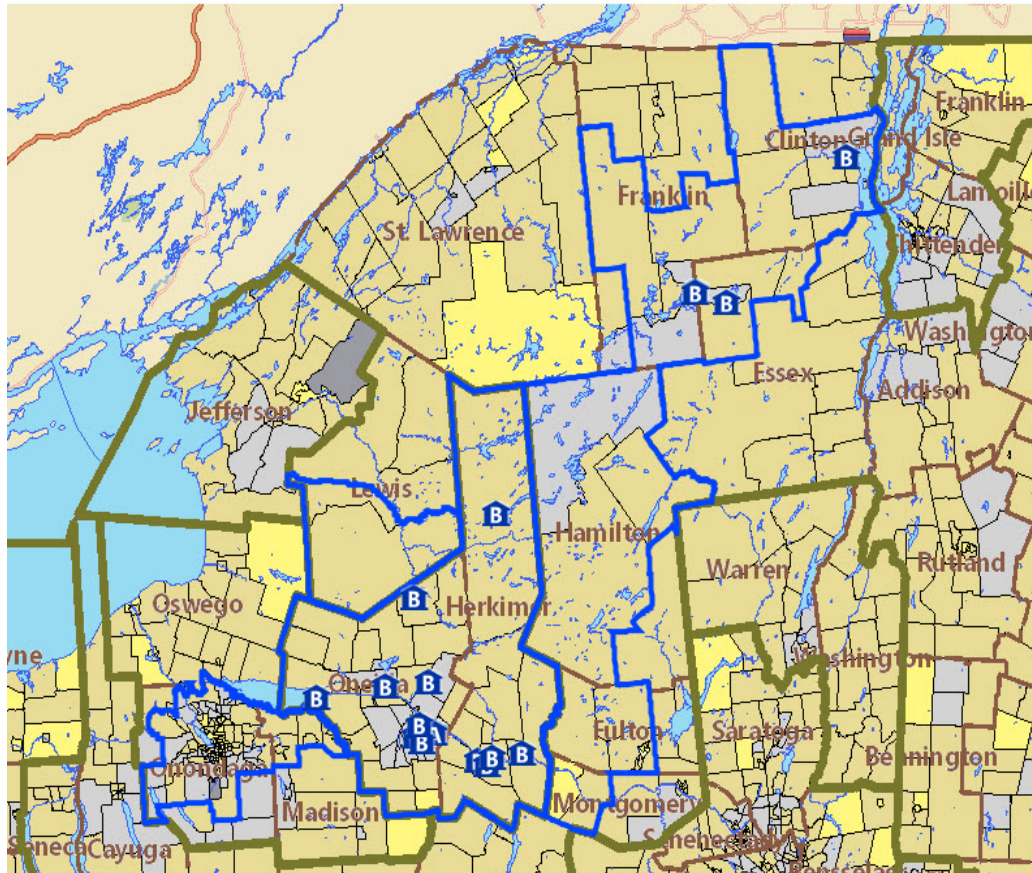
### Consumer Loan Distribution Table

Non-Metropolitan Assessment Area Lewis County - 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	5	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	5	100.0%
Middle	1	100.0%	5	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	5	100.0%	1	100.0%	5	100.0%

CRA APPENDIX B  
Maps of Assessment Areas

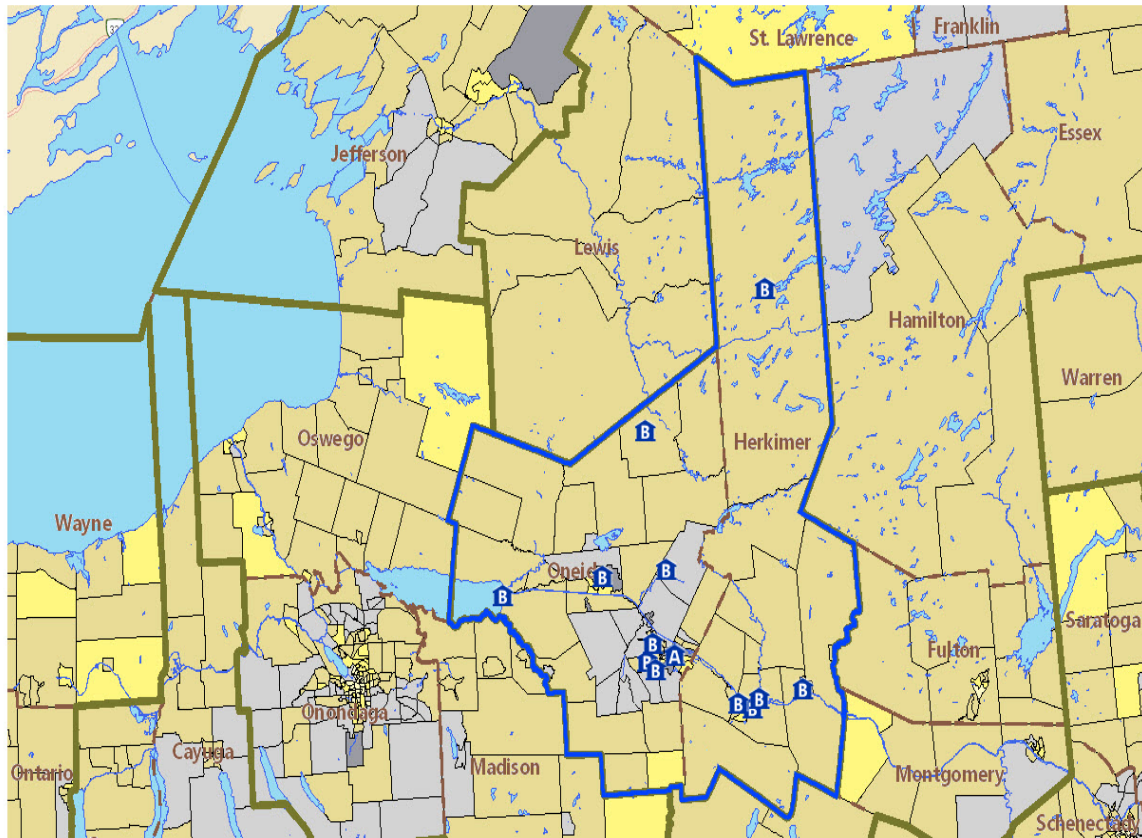
**Adirondack Bank**  
Assessment Area





**Adirondack Bank**

MSA 46540 (Utica-Rome, NY) Assessment Area



**LEGEND**  
2010 Census Year

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

AA Boundary

**BANK BRANCHES**  
Inside AA

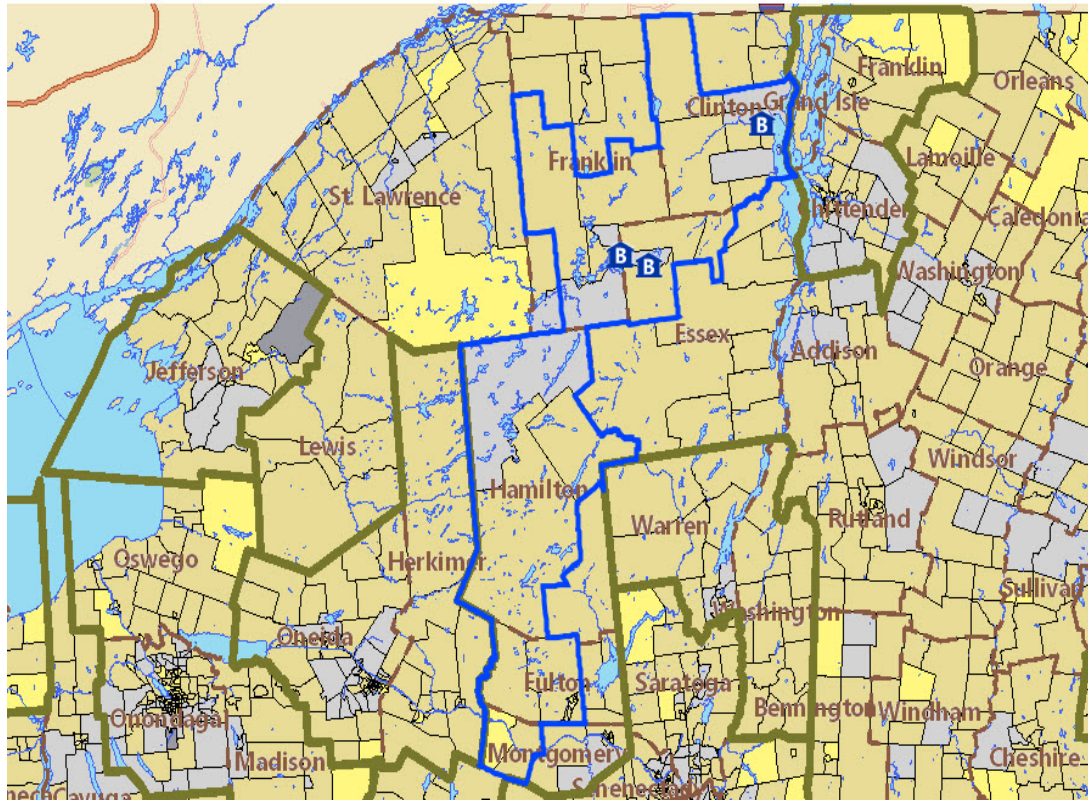
- B Branches with ATM - 13
- A Branches without ATM - 1

**FEATURES**

- Water Body

### Adirondack Bank

Non-metropolitan Assessment Area



**LEGEND**

2010 Census Year

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

AA Boundary

**BANK BRANCHES**  
Inside AA

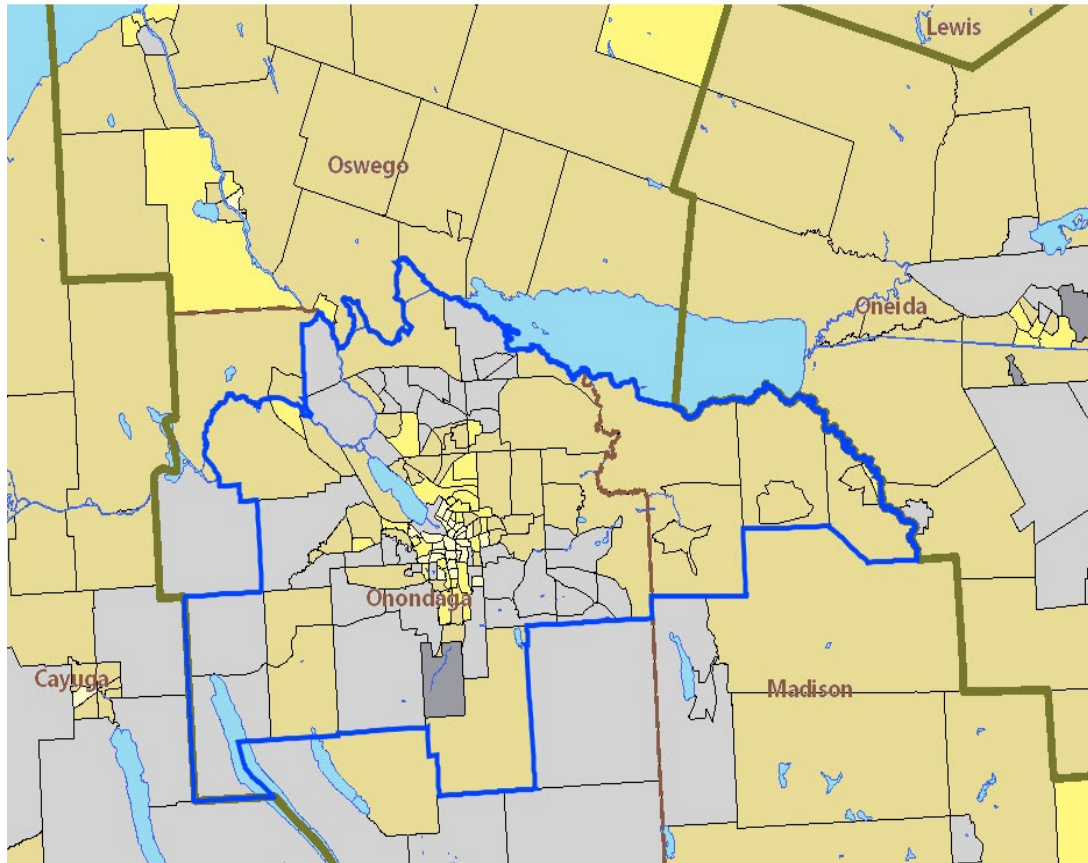
- Branches with ATM - 4

**FEATURES**

- Water Body

**Adirondack Bank**

MSA 45060 (Syracuse, NY) Assessment Area



**LEGEND**

2010 Census Year

**INCOME**

- Low
- Moderate
- Middle
- Upper
- Unknown

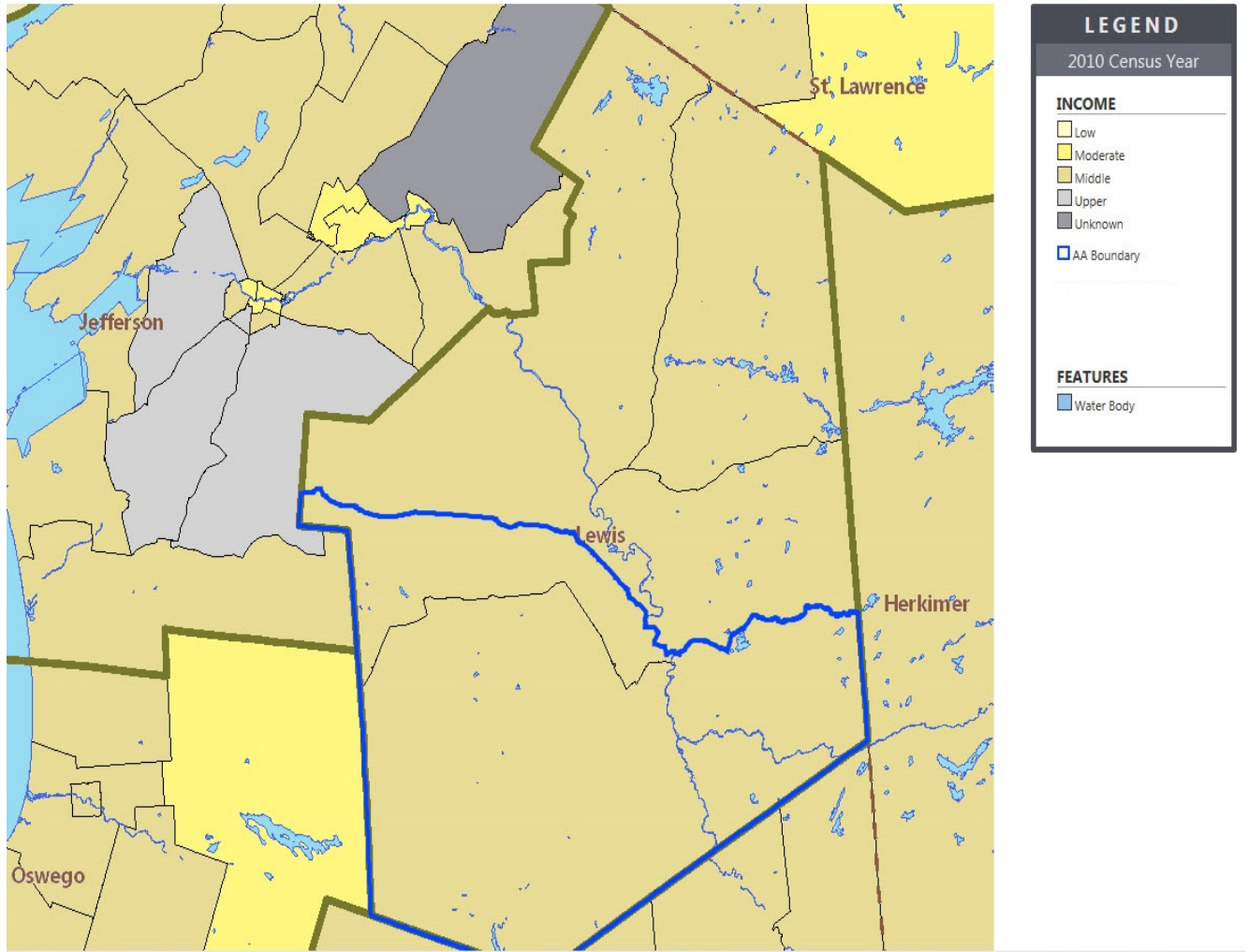
AA Boundary

**FEATURES**

- Water Body

### Adirondack Bank

Non-metropolitan Lewis County Assessment Area



## CRA APPENDIX C

### GLOSSARY

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** All agencies have adopted the following language. 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; or loans, investments or services that (i) Support, enable or facilitate projects or activities that meet 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 the 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).

**Community Development Financial Institution (CDFI):** A CDFI is an organization that has been certified by the U.S. Treasury as a provider of loans and services that assist specially funded institutions that revitalize LMI areas and assist LMI persons.

**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 people or more 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 persons who occupy a housing unit. Persons not living in households are classified as living in 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 a geography.

**Metropolitan Area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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.