

PUBLIC DISCLOSURE

May 6, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Five Star Bank
RSSD No. 601416

220 Liberty Street
Warsaw, NY 14569

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 RATING

INSTITUTION CRA RATING: Satisfactory.

The following table indicates the performance level of Five Star Bank with respect to the lending, investment and service tests.

PERFORMANCE LEVELS	<u>FIVE STAR BANK</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

Summary of Major Factors that Support the Rating

Lending Test:

- The volume of Home Mortgage Disclosure Act (“HMDA”), small business, small farm, and consumer lending reflect good responsiveness to assessment area credit needs;
- An adequate percentage of loans are made in the bank’s assessment areas;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and businesses and farms of different sizes;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and small businesses and farms;

- The bank is a leader in making community development loans; and
- Makes use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- The bank makes a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position;
- The bank makes occasional use of innovative and complex investments to support community development initiatives; and
- Investments and grants exhibit good responsiveness to credit and community development needs

Service Test:

- Retail delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas;
- The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income geographies and low- or moderate-income individuals;
- Services do not vary in a way that inconveniences its assessment areas, particularly in low- or moderate-income geographies or to low- or moderate-income individuals; and
- The bank provides a relatively high level of community development services

INSTITUTION

DESCRIPTION OF INSTITUTION

Five Star (“Five Star” or “bank”), headquartered in Warsaw, New York, is a full-service commercial bank with 54 branches in central and western New York State. The bank is a wholly-owned subsidiary of Financial Institutions, Inc., a one-bank holding company.

The bank offers a variety of credit products to consumers and businesses. Consumer products include residential mortgages (fixed and adjustable rate), home equity loans and lines of credit, motor vehicle, and unsecured personal loans. Commercial products include commercial mortgages, term loans, lines of credit, construction loans, equipment lines, SBA 7A and 504 loans to small businesses. The bank also offers agricultural loans; however, these loans represent a small percentage of the bank’s total loan portfolio.

As of March 31, 2019, Five Star had total assets of \$4.3 billion, gross total loans and leases of \$3.1 billion and total domestic deposits of \$3.5 billion. The table below summarizes the composition of Five Star’s loan portfolio as of March 31, 2019.

LOAN TYPE	\$(000s)	%
Construction and Development	\$183,581	5.9
Secured by One to Four Family Dwellings	\$666,105	21.4
Multifamily	\$114,624	3.7
Nonfarm Nonresidential Properties	\$683,410	22.0
Commercial and Industrial	\$459,904	14.8
Loans to Individuals	\$918,399	29.5
Agricultural Loans	\$31,004	1.0
All Other	\$54,221	1.7
TOTAL LOANS	\$3,111,248	100.0

Five Star operates in a competitive market with numerous local, regional, and national financial institutions conducting business in the bank’s four assessment areas. Local peer institutions include: Manufacturers and Traders Trust Company (M&T Bank), KeyBank, Bank of America, Citizens Bank, and Community Bank National Association. Based on deposits reported to the Federal Deposit Insurance Corporation (“FDIC”), on June 30, 2018, Five Star ranked fifth in deposit market share (4.6 percent) in the aggregate of counties in which Five Star’s assessment areas are located.

Five Star's loan portfolio includes products that provide flexible repayment terms to help meet the credit needs of low- and moderate-income ("LMI") borrowers and small businesses. Most notably, the bank originates SBA 7A and 504 loans and has received awards in both the Buffalo and Syracuse districts for the volume of loans originated. In 2017, the bank originated 156 SBA 7A loans totaling \$18.7 million.

There are no financial or legal factors that would prevent Five Star from fulfilling its responsibility under CRA.

Five Star's previous CRA evaluation was conducted as of September 30, 2013, using the Federal Financial Institutions Examination Council's ("FFIEC's") Interagency CRA Procedures for Large Institutions. At the previous CRA evaluation, Five Star received a "Needs to Improve" rating based on substantive violations of the Equal Credit Opportunity Act and the Fair Housing Act. The lending test was rated Low Satisfactory; the investment test was rated High Satisfactory and the service test was rated Needs to Improve.

Five Star operates in four assessment areas located in the State of New York, consisting of the following:

Full Scope Assessment Areas:

- Non Metropolitan Assessment Area consisting of Allegany, Cayuga, Cattaraugus, Genesee, Schuyler, Seneca, Steuben, and Wyoming Counties, and portions of Chautauqua County, NY.
- MSA 40380 (Rochester, NY), MSA consisting of Livingston, Monroe, Ontario, Orleans, Wayne, and Yates Counties. Five Star delineated the entirety of the six counties that comprise the Rochester MSA.
- MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) consisting only of Erie County.

Limited Scope Assessment Areas in New York:

- MSA 21300 (Elmira, NY) consisting of Chemung County, NY.

Five Star's assessment areas are in compliance with the requirements of Section 228.41 of Regulation BB and do not arbitrarily exclude low- and moderate-income geographies. Additional assessment area data can be found in the Assessment Areas Demographics table. Please refer to Appendix D for a map of the assessment areas.

SCOPE OF EXAMINATION

Procedures

Five Star's CRA performance was reviewed using the FFIEC's Interagency CRA Procedures for Large Institutions, which consist of the lending test, investment test, and service test. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics and credit and community development needs.

Products

Home purchase, refinance, multifamily and home improvement loans reportable under the Home Mortgage Disclosure Act ("HMDA"), small business and small farm loans reportable under CRA, and consumer motor vehicle (consumer) loans were analyzed for overall lending activity. Examiners verified the integrity of the 2013, 2014, 2015, 2016 and 2017 HMDA, small business and small farm loan data reported by Five Star. Multifamily loans were not analyzed for geographic and borrower loan distribution, as the volume was insufficient; however, multifamily loans were considered in the evaluation of assessment area concentration and community development lending.

Evaluation Period

HMDA-reportable, small business, small farm, and consumer loans originated between January 1, 2013 and December 31, 2017 were used in the analysis. Community development loans, investments, philanthropic grants, and services provided between October 1, 2013 and September 30, 2018 were evaluated as qualifying community development activities.

Lending Distribution Analysis

The borrower and geographic loan distribution analyses were based on loan activity in Five Star's assessment areas. Five Star's performance in 2013, 2014, 2015, and 2016 was compared to the U.S. Department of Commerce's Bureau of the Census ("2010 Census"), with Five Star's 2017 performance compared to the 2011-2015 American Community Survey ("2015 ACS") demographic data.

To evaluate geographic distribution of lending, the proportion of home purchase and refinance lending was compared to the proportion of owner-occupied housing units located in low- and moderate-income geographies. For small business and small farm loans, the analysis compared

the proportion of loan originations to the proportion of businesses and farms located in low- and moderate-income geographies, as reported by Dun and Bradstreet (“D&B”). For consumer loans, the analysis compared the proportion of loan originations to the proportion of households located in low- and moderate-income geographies.

In order to analyze the borrower characteristics of home purchase, refinance, and consumer lending, the proportion of originations to low- and moderate-income borrowers was compared with the proportion of low- and moderate-income families residing in the assessment area. Income estimates from the U.S. Department of Housing and Urban Development (“HUD”) and the FFIEC were used to categorize borrower income. For each year of the evaluation period, FFIEC-adjusted median family income levels were used to categorize borrower income levels. For small business and small farm lending, Five Star’s percentage of loans to businesses with gross annual revenues (“GAR”) of \$1 million or less and Five Star’s percentage of loans to farms with gross annual revenues of \$500,000 or less was compared to the percentage of all such businesses and farms located in the assessment area, as reported by D&B. Further, the dollar amount of small business and small farm loans were also used to identify responsiveness to businesses and farms with GAR of \$1 million or less.

Borrower and geographic distribution analyses were based on Five Star’s 2013 to 2017 performance compared, respectively, to the performance data for the aggregate of all loan reporters in the assessment areas during that same year. Aggregate lenders include all lenders required to report HMDA-reportable and CRA small business and small farm lending data within Five Star’s assessment areas. Aggregate data for consumer lending was not available for analysis.

Community Development Activity Analysis

Community development activities were reviewed to determine whether activities had community development as a primary purpose and whether the community development activities benefitted the assessment area or the broader statewide or regional area, including the assessment area. The eligibility of a loan, investment, or service as a community development activity was based on demographic information at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews and received comments from four non-profit agencies and one government agency, as well as participated in a meeting with representatives from five non-profit agencies and the City of Rochester concerning the credit and banking needs in the City of Rochester.

Key highlights from the meeting include performance context factors; specifically, agency representatives noted that economic and demographic data at the county level are more favorable than in the city itself. Attendees indicated that much of the City of Rochester is under banked. The city suffers from high unemployment and has some of the highest number of poor children in the country. The housing stock is old and requires maintenance. Rents are increasing while wages are remaining stable. The representatives also noted that banks in the area are closing branches without sufficient alternatives, and there is a need for improved access to all types of banking services in the City of Rochester.

A second contact was with representatives from a coalition of over 30 non-profits and individuals. The coalition submitted comments analyzing Five Star's performance in the City of Rochester as part of this evaluation. The comments indicated that Five Star has increased its presence in the mortgage market particularly in home purchase lending in the city in low- and moderate-income and majority-minority neighborhoods. Its portfolio affordable housing product fits the needs of many of the area's first time homebuyers. With respect to small business lending, Five Star is working to provide credit to smaller businesses; however, it needs to improve its market share in the city compared to its market share in the MSA. The comments also indicated that Five Star has worked with many of the coalition members to address local community development needs.

A third contact was with a non-profit corporation that provides legal services to low-income individuals in Western New York. Services include representation for individuals facing foreclosure, fair lending advocacy and education, and outreach to community residents and real estate professionals. The contact indicated that banks are having difficulty providing services to low- and moderate-income residents. In addition, the contact commented that there is a need for increased language access as a considerable number of immigrants have settled in the low- and moderate-income areas. It was also noted that banks in the area need to improve in providing advertising to the community, and employing staff that reflect the community, as there is a mistrust of banks. In general, the contact stated that banks need to do more to support the community.

A fourth contact was with a non-profit organization whose mission is to provide safe, affordable housing for low- and moderate-income rural New Yorkers. The organization services an area that

includes all of New York State with the exception of the metropolitan New York City area and identifies strategies to improve and provide affordable housing in the rural areas of New York State and. The contact stated that real estate valuations in rural New York are low. Many of the homes need substantial repairs that exceed the home's value; therefore, homeowners have difficulty selling their homes and recouping their investment. The contact also stated that there is a need for financing, yet finance professionals in rural New York State lack understanding of programs such as low-income housing tax credits ("LIHTC"). In addition, the contact indicated that banks need to improve foreclosure counseling, as rural New York State still has a foreclosure crisis and banks are not contributing to housing and foreclosure counseling.

A fifth contact was with a non-profit organization whose mission is to enhance the quality of life in communities by building independence and creating housing options through developing decent, affordable, and safe housing. The organization operates as a human service and housing services provider, real estate developer and property management corporation. It also is a Neighborworks affiliate and rural development corporation. The contact stated that some communities in upstate New York such as Corning, Horseheads, and Big Flats are vibrant while others such as Elmira, Hornell, and smaller communities across Steuben County are struggling. The contact noted that banks are generally supportive to the community and focus their efforts on home ownership; however, there is a need for more foreclosure counseling and financial literacy efforts.

A sixth contact was with an economic development agency for one of the counties in the Non Metropolitan assessment area. The mission is to leverage collaboration between private and public partners to successfully lead long-term, sustainable economic development. The organization provides services such as grant writing and management, small business loan request writing and issuing assistance, site selection, and business advisement. The contact indicated that banks could be doing more in the community, specifically providing access to small business loans, microloans, and startup loans.

Summary of Key Assessment Area Data

The following table summarizes the key demographic and performance factors used to evaluate Five Star's performance within its assessment areas:

Summary of Key Assessment Area ("AA") Data (2013-2017)					
	Non-Metropolitan	MSA 40380	MSA 15380	MSA 21300	Totals
Population¹	532,244	1,083,156	921,584	88,267	2,625,251
% of Total AA Population	20.3%	41.3%	35.1%	3.4%	100.0%
Number of Families	136,456	268,759	229,957	21,951	657,123
% of Total AA Families	20.8%	40.9%	35.0%	3.3%	100.0%
Census Tracts¹	144	272	237	22	675
% of Total AA Census Tracts	21.3%	40.3%	35.1%	3.3%	100.0%
LMI Census Tracts	16	88	79	7	190
% of Total AA LMI Census Tracts	8.4%	46.3%	41.6%	3.7%	100.0%
Total Owner-Occupied Units¹	152,140	290,032	248,889	24,286	715,347
% of Total AA Units	21.3%	40.5%	34.8%	3.4%	100.0%
Business Establishments²	15,814	35,328	32,160	2,366	85,668
% of Total AA Businesses	18.5%	41.2%	37.5%	2.8%	100.0%
Number of Branches³	25	22	4	3	54
% of Total AA Branches	46.3%	40.7%	7.4%	5.6%	100.0%
Branches in LMI Tracts	4	6	0	2	12
% of Total AA Branches in LMI Tracts	33.3%	50.0%	0.0%	16.7%	100.0%
Branch Deposits (\$'000s)⁴	1,752,250	1,176,075	173,970	166,756	3,269,051
% of Total AA Deposits	53.6%	36.0%	5.3%	5.1%	100.0%
Market Share in AA	21.3%	6.2%	0.4%	15.9%	4.8%
Market Share Ranking in AA	1	7	10	3	5
Home Purchase Loans⁵	612	593	252	54	1,511
% of Total AA Home Purchases	54.7%	36.9%	4.5%	3.9%	100.0%
Refinance Loans⁵	1,338	1,183	147	84	2,752
% of Total AA Refinances	48.6%	43.0%	5.3%	3.1%	100.0%
Home Improvement Loans⁵	1,158	781	95	82	2,116
% of Total AA Home Improvement Loans	54.7%	36.9%	4.5%	3.9%	100.0%
Small Business Loans⁵	789	912	287	70	2,058
% of Total AA Small Business Loans	38.3%	44.3%	13.9%	3.4%	100.0%
Small Farm Loans⁵	90	57	6	0	153
% of Total AA Small Farm Loans	58.8%	37.3%	3.9%	0.0%	100.0%
Consumer Loans	2,761	7,778	3,896	186	14,621
% of Total AA Consumer Loans	18.9%	53.2%	26.6%	1.3%	100.0%
Combined Loans	6,748	11,304	4,683	476	23,211
% of Total AA Combined Loans	29.1%	48.7%	20.2%	2.1%	100.0%

(1) Demographic information obtained from the 2015 Census. (2) Business Establishments information reported by D&B for 2017. (3) Branch numbers are as of 6/30/2018. (4) Branch deposits and deposit market share from the FDIC as of 6/30/2018. (5) Loans reported under HMDA or CRA Small Business and Small Farm reporting for years 2013-2017.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**LENDING TEST**

Five Star's overall performance in meeting the credit needs of its assessment areas is rated **High Satisfactory**.

Lending Activity

Five Star's responsiveness to the retail credit needs of its assessment areas was good given the bank's capacity, overall market conditions, including the state of the housing market and local economic conditions. Overall, 46,316 home purchase, refinance, home improvement, multi-family, small business, small farm, and consumer loans were made during the evaluation period, totaling approximately \$1.9 billion.

The following table provides a summary of Five Star's lending activity during the review period.

SUMMARY OF LENDING ACTIVITY January 1, 2013 – December 31, 2017				
LOAN TYPE	#	%	\$(000s)	%
HMDA Home Purchase	1,543	3.3	\$186,166	10.0
HMDA Refinancings	2,781	6.0	\$266,988	14.3
HMDA Home Improvement	2,136	4.6	\$100,619	5.4
HMDA Multi Family	35	0.1	\$39,510	2.2
Total HMDA-related	6,495	14.0	\$593,283	31.9
Total Small Business	2,142	4.6	\$319,368	17.1
Total Small Farm	158	0.3	\$18,290	1.0
Consumer (Motor Vehicle)	37,521	81.0	\$930,666	50.0
TOTAL LOANS	46,316	100.0	\$1,861,607	100.0

Note: This table includes bank and affiliate loans made within the evaluation period.

Assessment Area Concentration

An adequate percentage of loans were made in the assessment areas. During the evaluation period, Five Star made 50.2 percent of its total loans by number and 66.5 percent by dollar volume, in their assessment areas. The primary driver of the lower concentration in the assessment area was consumer motor vehicle loans. Of the bank's consumer motor vehicle loans originated during the review period, only 39.0 percent by number (37.3 percent by dollar amount) were originated within the assessment area. However, community representatives noted the need for small business and home lending, indicating that of the primary credit needs in the area, Five Star is originating a

significant portion of its loans within its assessment area. The table below presents the bank's lending inside and outside of the assessment areas during the evaluation period.

LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA JANUARY 1, 2013 – DECEMBER 31, 2017								
Loan Type	INSIDE				OUTSIDE			
	#	%	\$ (000S)	%	#	%	\$ (000S)	%
Home Purchase	1,511	97.9	\$181,261	97.4	32	2.1	\$4,905	2.6
Refinancings	2,752	99.0	\$263,722	98.8	29	1.0	\$3,266	1.2
Home Improvement	2,116	99.1	\$99,769	99.2	20	0.9	\$850	0.8
Multi-Family	28	80.0	\$32,721	82.8	7	20.0	\$6,789	17.2
Total HMDA	6,407	98.6	\$577,473	97.3	88	1.4	\$15,810	2.7
Total Small Business	2,058	96.1	\$296,222	92.8	84	3.9	\$23,146	7.2
Total Small Farm	153	96.8	\$17,728	96.9	5	3.2	\$562	3.1
Total Consumer (Motor Vehicle)	14,621	39.0	\$347,476	37.3	22,900	61.0	\$583,190	62.7
Total Loans	23,239	50.2	\$1,238,899	66.5	23,077	49.8	\$622,708	33.5

Note: This table includes only loans originated or purchased by the bank. Affiliate loans are not included.

Geographic Distribution

The geographic distribution of HMDA-related, small business, small farm, and consumer loans reflects good penetration throughout the assessment areas. Additional analysis of loan penetration revealed good loan distribution throughout the bank's assessment areas.

Borrower Distribution

The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and businesses and farms of different sizes. In 2017, Five Star ranked fourth of 138 lenders in HMDA lending to low- and moderate-income borrowers in the Non Metropolitan assessment area, 15th out of 152 lenders in HMDA lending to low- and

moderate-income borrowers in MSA 40380 (Rochester, NY) and 16th out of 142 lenders in HMDA lending to low- and moderate-income borrowers in MSA 15380 (Buffalo-Niagara Falls, NY).

Innovative or Flexible Lending Practices:

Five Star makes use of innovative and/or flexible lending practices in serving assessment area credit needs. A number of Five Star's products were responsive to specific community needs in the assessment areas, as illustrated below:

- Home For You - A mortgage product designed to provide easier access to home ownership for borrowers that are less than 80.0 percent of the area median income. The program features a discounted fixed interest rate, reduced closing costs, a low down payment, up to a 97.0 percent loan to value (LTV), no private mortgage insurance (PMI) and up to a \$3,000 grant for qualified applicants. Under this program, Five Star originated 605 loans from 2016 to 2018.
- The Neighborhood Mortgage Loan - A mortgage product for borrowers purchasing a home in low- or moderate-income geographies without any income restrictions. The loan features a small down payment and no private mortgage insurance (PMI). The product started in 2018. Under this program, the bank made seven loans totaling \$986,468.
- Helping Hand Loan - A micro-loan up to \$2,500 for borrowers with incomes less than 80.0 percent of annual median family income for the county. Borrowers must complete a financial literacy course prior to closing. The loan can be utilized to refinance, for home improvement, debt consolidation, or for personal purchases and expenses, and is designed to help individuals build or repair credit. A total of 51 loans for \$109,972 were outstanding as of December 31, 2017.
- Empire Loan - A loan to small businesses located in majority minority neighborhoods or businesses that serve residents of a majority minority census tract. The loan program offers a 1.0 percent reduction in interest rate and no fees. The loan can either be an unsecured short-term loan or a mortgage. The program was started in 2015 in response to fair lending concerns raised by the Federal Reserve Bank of New York and the State of New York Attorney General's office over lending in minority census tracts in the City of Rochester. During the evaluation period, the bank originated 19 loans for \$4 million under this program.

- Five Star also offers and participates in several flexible lending programs to provide borrowers with options to obtain mortgage loans. These programs included government guaranteed loans through Freddie Mac, the Federal Housing Administration (FHA), State of New York Mortgage Agency (SONYMA), Veterans Administration (VA) and the United States Department of Agriculture (USDA).

Community Development Lending

Five Star is a leader in making community development loans. When compared to the six other similarly situated banks operating in the assessment area, Five Star’s level of total annualized community development lending, measured as a percentage of average assets, exceeded the other banks, and when compared to Tier One capital, Five Star ranked fourth.

As depicted in the table below, the bank extended 108 community development loans totaling \$171.7 million. This represents a 36.8 percent decline in the number of community development loans from the previous evaluation; however, it is only a 1.6 percent decline in dollar volume of community development loans. In addition, community development lending activities focused primarily on revitalization and stabilization and affordable housing, which had been identified by community contacts as important needs in the assessment areas.

Community Development Loan Summary										
October 1, 2013 - September 30, 2018										
Assessment Area	#	Affordable Housing (\$000s)	#	Community Services (\$000s)	#	Economic Development (\$000s)	#	Revitalize and Stabilize (\$000s)	#	Total (\$000s)
Non Metropolitan AA	7	\$6,413	32	\$12,014	3	\$8,508	0	\$0	42	\$26,935
MSA 40380	10	\$12,892	20	\$10,055	5	\$6,694	7	\$18,361	42	\$48,002
MSA 15380	2	\$12,212	1	\$3,000	1	\$7,200	12	\$49,940	16	\$72,352
MSA 21300	0	\$0	5	\$1,600	0	\$0	1	\$8,500	6	\$10,100
Statewide	1	\$13,000	0	\$0	0	\$0	1	\$1,275	2	\$14,275
Total Community Development Loans	20	\$44,517	58	\$26,669	9	\$22,402	21	\$78,076	108	\$171,664
Percent of Total	19%	26%	54%	16%	8%	13%	19%	45%	100%	100%

INVESTMENT TEST

Five Star’s performance relative to the Investment Test is rated high satisfactory based on the significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank makes

occasional use of innovative and complex investments to support community development initiatives. In addition, the bank exhibits good responsiveness to credit and community development needs in its assessment areas.

During the evaluation period, qualified investments totaled \$84.7 million. Of the total, \$80.9 million, or 95.5 percent of total activity, represented new investments made since the prior evaluation. During the previous evaluation, the bank made \$53.4 million in qualified investments, representing a 58.6 percent increase in qualified investments since the previous evaluation. The table below represents the total qualified investments made during the evaluation period.

Qualified Investment Summary										
October 1, 2013 - September 30, 2018										
Assessment Area	#	Affordable Housing (\$000s)	#	Community Services (\$000s)	#	Economic Development (\$000s)	#	Revitalize and Stabilize (\$000s)	#	Total (\$000s)
Non Metropolitan AA	8	\$2,660	44	\$1,761	0	\$0	107	\$18,642	159	\$23,063
MSA 40380	10	\$12,200	42	\$455	1	\$10	37	\$6,774	90	\$19,439
MSA 15380	8	\$11,104	26	\$190	5	\$30	0	\$0	39	\$11,324
MSA 21300	4	\$427	9	\$23	3	\$15	8	\$3,887	24	\$4,352
Statewide	9	\$17,335	1	\$5	10	\$8,970	1	\$210	21	\$26,520
Total Qualified Investments	39	\$43,726	122	\$2,434	19	\$9,025	153	\$29,513	333	\$84,698
Percent Total # / \$ Investments	12%	52%	37%	3%	6%	11%	46%	35%	100%	100%

A total of \$20.0 million or 23.6 percent by dollar amount, of total qualified investments consisted of the purchase of municipal bonds for infrastructure projects that assisted in revitalizing low- and moderate-income or distressed middle-income census tracts. A total of \$11.3 million supported school districts in need of repairs and updates where the majority of students were eligible for free or reduced rate lunches. Additionally, \$9.0 million in qualified investments consisted of equity investments in ten limited partnerships that invest in small business development activities throughout western New York State and 26 investments for \$43.7 million were in mortgage-backed securities for low- and moderate-income borrowers in the broader regional areas of New York State.

Qualified investments included 129 grants and contributions totaling \$794,000 made during the evaluation period primarily to organizations providing community services to low- and moderate-income recipients in the assessment areas; however, donations were also made for affordable housing and economic development programs.

SERVICE TEST

Five Star’s performance relative to the service test is rated high satisfactory based on delivery systems that are accessible to the bank’s geographies and individuals of different income levels in its assessment areas; a record of opening and closing of branches that has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low- and moderate-income individuals; services do not vary in a way that inconveniences its assessment areas, particularly low- and moderate-income geographies and low- and moderate-income individuals; and provides a relatively high level of community development services.

Retail Services

Five Star’s delivery systems are accessible to the bank’s geographies and individuals of different income levels in its assessment areas. As of December 31, 2018, the bank operated a network of 54 branch locations (including its main office). Of the bank’s total branches, three are located in low-income census tracts, nine in moderate-income census tracts, 32 in middle-income census, and nine in upper-income census tracts. One branch is located in an unknown-income census tract, which is adjacent to both low- and moderate-income census tracts.

Five Star’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low- and moderate-income individuals. Five Star opened a total of four branches during the evaluation period. One new branch in a low-income census tract, one in a moderate-income census tract, one in an upper-income census tract, and one in an unknown-income census tract that is adjacent to six low- and moderate-income census tracts. The bank relocated one branch within an upper-income census tract. In addition, two branches were closed on October 31, 2013 to address redundancies that were a result of the bank’s acquisition of eight branches from First Niagara Bank. Both of the closed branches were located in middle-income census tracts. Five Star’s branches and ATMs are summarized in the subsequent table:

Summary of Five Star’s Branches Branch Location By Census Tract Income Level As of December 31, 2018						
Tract Income Category	Branches		ATMs			
	#	%	Full service		Cash Only	
			#	%	#	%
Low	3	5.6	3	5.0	0	0.0
Moderate	9	16.7	10	16.7	2	12.5

Middle	32	59.3	36	60.0	13	81.3
Upper	9	16.7	9	15.0	1	6.2
Unknown	1	1.9	2	3.3	0	0.0
Total	54	100.0	60	100.0	16	100.0
<i>ATMs include both branch and off-site locations.</i>						

Five Star operates Automated Teller Machines (“ATMs”) at 54 of its branches. Of the bank’s branches, 51 branches operate full-service ATMs, with three branches operating cash-only ATMs. In addition, to the 54 ATMs maintained at each branch, there are three branches that maintain an additional two full service ATMs. One of the three branches is located in a moderate-income census tract; one in a middle-income census tract; and one in an unknown-income census tract. Five Star also maintains three full-service standalone ATMs, and 13 proprietary cash-only ATMs at off-site locations. Five Star is also connected to the Allpoint network of ATMs, which are available in retail locations on a nationwide basis. In addition, Five Star offers alternative delivery systems such as bank-by-mail, online services, and 24-hour telephone banking.

All Five Star products and services are available at each branch location, branch hours do not vary in a way that inconveniences its assessment areas or low- and moderate-income geographies and low- and moderate-income individuals. Approximately 63.0 percent of the Five Star branches have Saturday lobby hours and Saturday drive-up hours and four of the twelve branches (33.0 percent) that are located in low- or moderate-income census tracts have Saturday lobby hours and Saturday drive-up hours. The one branch location in an unknown-income census tract but adjacent to six low- or moderate-income census tracts does not have Saturday lobby hours or Saturday drive-up hours. In general, branches are open from 9:00AM to 4:00PM from Monday through Wednesday and from 9:00AM to 6:00PM on Thursday and Friday, with minor variations.

In addition to its branches and ATMs, Five Star maintains a full-service website that offers customers online banking products, including checking and savings accounts, money market accounts, and Certificates of Deposit (“CDs”). Customers are able to initiate residential home loan and home equity finance applications online. Five Star’s products and services are also accessible through the bank’s mobile application, which is available on both Android and IOS platforms. In addition, the bank’s website offers a suite of products and services to business customers.

COMMUNITY DEVELOPMENT SERVICES

Five Star provides a relatively high level of community development services in its assessment areas. As presented in the table below, Five Star conducted 106 community service events, representing a 130.4 percent increase in community development services since the previous

evaluation. These consisted of a wide variety of events related to the financial education of children and adults, first-time homebuyers, economic development, and technical assistance.

Summary of Community Development Services October 1, 2013 – September 30, 2018	
Activity Type	Current Evaluation Total
Residential Mortgage/First-time Homebuyers Seminars	28
Technical Assistance Events	43
Financial Literacy Events	35
TOTAL ACTIVITY	106

Bank officers and senior staff also served on the boards and committees of 76 community development organizations that provided ongoing financial and management expertise and to organizations focused on low- and moderate-income youth, children in foster care, support for homeless individuals, and supportive housing for at-risk and disabled individuals.

Examples of the community development services include:

- Bank officers sat on the advisory boards, Board of Directors, and various board committees of community service organizations focused on low- and moderate-income youth, children in foster care, victims of domestic abuse, low- and moderate-income individuals requiring women’s services, support for homeless individuals and supportive housing for at-risk, and disabled individuals.
- Three bank officers served on the Board of Directors of organizations that provide affordable housing to low- or moderate-income individuals.
- A bank officer served on the Board of Directors of an organization that provides education and enrichment programs to children of low- and moderate-income families.
- A bank officer served on the Board of Directors of an organization that provided credit counseling to low- and moderate-income individuals.
- A bank officer served as treasurer and on the Board of Directors of an organization that provides food assistance to low- and moderate-income families.

- Two bank officers served as treasurer and on the Board of Directors of an organization that provides financial and technical support to smaller organizations that provide a variety of services to low- and moderate-income families.
- Nine bank officers served on the Board of Directors of organizations that provide economic development, job creation/retention and workforce development assistance to local communities.

In addition, Five Star is a member in the Federal Home Loan Bank of New York's ("FHLB") Affordable Housing Program ("AHP"). The AHP provides subsidies for projects that finance the creation and rehabilitation of single and multifamily housing for low- and moderate-income individuals, or projects which finance rental housing where at least 20.0 percent of the units will be occupied by and affordable to households at or below 50.0 percent of the area median income. Only member institutions of the FHLB can submit AHP applications. Therefore, nonprofit agencies, local governments, and community development organizations must obtain the sponsorship of member institutions to apply for AHP funds. As a member, Five Star is responsible for monitoring the approved project and ensuring the affordable housing project is consistent with its approved program objectives. In 2018, Five Star submitted three proposals totaling \$4.1 million to construct 388 units of affordable housing, of which one proposal for 103 units of affordable housing for \$1.5 million was approved.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

NON METROPOLITAN AREA (FULL REVIEW)

**(Allegany, Cattaraugus, Cayuga, Genesee, Schuyler, Seneca, Steuben, and Wyoming
Counties and portions of Chautauqua Counties, NY)**

DESCRIPTION OF INSTITUTION'S OPERATIONS

The Non Metropolitan assessment area contains the largest portion of Five Star's deposits at 53.6 percent, and the second largest portion of loans (29.1 percent). As previously shown in the Summary of Key Assessment Area Data table, Five Star operates 25 branches in the Non Metropolitan assessment area and 29.1 percent of the bank's HMDA-reportable, small business, small farm, and consumer loans were originated in this assessment area.

As of June 30, 2018, 53.6 percent of Five Star's deposits were held in the assessment area. Five Star was the largest depository institution in the assessment area with a deposit market share of 21.3 percent, followed by Community Bank National Association, which had 18.2 percent of deposits. Other lead banks in terms of deposit market share operating in the assessment area include: Key Bank National Association, M&T Bank, Bank of Castile, Chemung Canal Trust Company, and Steuben Trust Company.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

The Non Metropolitan assessment area encompasses portions of nine contiguous counties located mainly in the western and Finger Lakes regions of New York State. These counties are primarily rural with towns and villages scattered across the assessment area. According to the 2015 ACS, the Non Metropolitan assessment area population totals 532,244. The Non Metropolitan assessment area contains 20.3 percent of the bank's combined assessment area population. The assessment area consists of 144 census tracts, of which 4 are low-income, 12 are moderate-income, 113 are middle-income, 12 are upper-income and 3 are unknown-income. The assessment area includes 14 middle-income census tracts in Chautauqua County that met the FFIEC definition, in

2013 and 2014, of distressed middle-income census tracts based on poverty levels. Four census tracts in Schuyler County meet the FFIEC definition of underserved middle-income census tracts for remote rural areas from 2013 through 2016. Further, all five census tracts in Schuyler County in 2017 met the FFIEC definition of underserved middle-income census tracts for remote rural areas.

Income Characteristics

The Non Metropolitan assessment area has 136,456 families, of which 20.5 percent are considered low-income, 18.4 percent are moderate-income, and 10.9 percent have incomes below the poverty level. Based on FFIEC data, the median family income for the assessment area was consistently below the State of New York. Of the counties that comprise the assessment area, Genesee County had the highest median family income, while Allegany, Chautauqua, and Cattaraugus Counties had the lowest.

Median Family Income		
County	2010	2015
Assessment Area	\$53,971	\$58,833
Allegany	\$49,864	\$52,942
Cattaraugus	\$51,227	\$53,921
Cayuga	\$58,761	\$63,969
Chautauqua	\$51,031	\$54,311
Genesee	\$60,127	\$64,483
Schuyler	\$54,322	\$61,155
Seneca	\$53,857	\$63,975
Steuben	\$52,867	\$57,508
Wyoming	\$58,009	\$64,100
State of New York	\$67,405	\$71,913

Housing Characteristics

According to the 2015 ACS, the Non Metropolitan assessment area has 260,022 housing units, of which 58.5 percent are owner-occupied and 23.5 percent are rental units. Of the available owner-occupied units, 7.2 percent are located in low- or moderate-income geographies. In low-income census tracts, 65.6 percent the housing units are rental units, 12.6 percent are vacant, and 21.8 percent are owner-occupied. In moderate-income census tracts, 55.2 percent of the housing units are either rental or vacant, and 44.8 percent are owner-occupied.

According to the 2015 ACS, the median age of housing stock in the assessment area was 61 years old, with 44.5 percent of the stock built before 1950. The median age of housing stock in low- and

moderate-income tracts was 61 years, which indicates that there is potential opportunity to make home improvement loans.

According to the 2015 ACS, the median housing value in the Non Metropolitan assessment area was \$93,125, with an affordability ratio of 50.4¹. The median housing values increased in all nine counties between 2010 and 2015, while household incomes also increased. During the review period, Allegany County had the most affordable housing while Schuyler County was the least at 43.9, which was still well above the state of New York at 20.9. Median gross rents increased across all of the assessment area with the exception of Wyoming County which decreased. Steuben County experienced, by percentage, the largest increase in rental rates, while Genesee County had the highest median gross rent by dollar amount in the assessment area. Within the assessment area, 42.7 percent of all renters had rental costs that exceeded 30.0 percent of their incomes. The table below presents housing characteristics from the 2010 Census and the 2015 ACS for the assessment area and the State of New York.

County	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change (Rent)
Non Metropolitan	\$85,817	52.2	\$93,125	50.4	\$605	\$643	6.3%
Allegany	\$66,100	62.5	\$70,300	60.9	\$568	\$606	6.7%
Cattaraugus	\$77,000	55.2	\$84,600	50.4	\$582	\$617	6.0%
Cayuga	\$98,400	49.2	\$113,600	45.9	\$629	\$673	7.0%
Chautauqua	\$79,600	51.1	\$84,500	50.9	\$581	\$612	5.3%
Genesee	\$101,400	49.1	\$107,000	47.6	\$670	\$724	8.1%
Schuyler	\$86,700	54.7	\$108,500	43.9	\$602	\$640	6.3%
Seneca	\$88,900	52.5	\$97,000	50.8	\$661	\$716	8.3%
Steuben	\$83,000	52.9	\$91,000	52.0	\$597	\$658	10.2%
Wyoming	\$97,300	51.5	\$102,000	51.5	\$629	\$589	-6.4%

¹ The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.

State of New York	\$303,900	18.3	\$283,400	20.9	\$977	\$1,132	15.9%
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Labor, Employment and Economic Characteristics

According to the New York State Department of Labor, the economy in western New York State has shown steady job growth from 2010 to 2017. Growth has centered on three industry sectors, leisure and hospitality, education and health services, and financial activities. Outside of the metropolitan areas, the economy is largely agricultural. Approximately 21.0 percent of New York State’s farmland comes from the Finger Lakes Region of New York State, which includes four of the Non Metropolitan assessment area counties. During the evaluation period, average annual unemployment rates declined from a high of 8.8 percent in 2013 in Schuyler County to a low 4.5 percent in Seneca County in 2017.

U.S. Department of Labor Annual Unemployment Rates					
Area	2013	2014	2015	2016	2017
Allegany	7.5	6.2	6.5	6.3	6.6
Cattaraugus	8.5	7.0	6.3	6.0	6.2
Cayuga	7.4	6.0	5.3	5.1	5.0
Chautauqua	8.0	6.8	6.0	5.8	6.0
Genesee	6.8	5.5	5.0	4.6	4.8
Schuyler	8.8	7.0	6.6	6.0	5.8
Seneca	6.9	5.6	5.2	4.8	4.5
Steuben	8.4	6.9	6.3	5.8	5.7
Wyoming	7.9	6.5	5.6	5.3	5.6
State of New York	7.7	6.3	5.3	4.9	4.7

Detailed demographic data for the assessment area is provided in the following table.

Assessment Area Demographics

Non Metropolitan AA - 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	4	2.8	1,650	1.2	790	47.9	27,924	20.5	
Moderate-income	12	8.3	10,698	7.8	2,463	23	25,080	18.4	
Middle-income	113	78.5	111,557	81.8	10,957	9.8	30,152	22.1	
Upper-income	12	8.3	12,545	9.2	602	4.8	53,300	39.1	
Unknown-income	3	2.1	6	0	0	0	0	0	
Total Assessment Area	144	100.0	136,456	100.0	14,812	10.9	136,456	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	4,660	1,016	0.7	21.8	3,056	65.6	588	12.6	
Moderate-income	22,108	9,907	6.5	44.8	8,943	40.5	3,258	14.7	
Middle-income	211,329	126,762	83.3	60	44,183	20.9	40,384	19.1	
Upper-income	21,909	14,455	9.5	66	4,864	22.2	2,590	11.8	
Unknown-income	16	0	0	0	6	37.5	10	62.5	
Total Assessment Area	260,022	152,140	100.0	58.5	61,052	23.5	46,830	18.0	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	617	3.9	515	3.7	99	6.4	3	0.6	
Moderate-income	1,458	9.2	1,203	8.8	228	14.7	27	5.2	
Middle-income	12,242	77.4	10,704	77.9	1,094	70.3	444	85.5	
Upper-income	1,493	9.4	1,313	9.6	135	8.7	45	8.7	
Unknown-income	4	0	4	0	0	0	0	0	
Total Assessment Area	15,814	100.0	13,739	100.0	1,556	100.0	519	100.0	
Percentage of Total Businesses:				86.9		9.8		3.3	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0	
Moderate-income	30	2.1	29	2.2	1	1.5	0	0	
Middle-income	1,267	89.7	1,206	89.7	61	89.7	0	0	
Upper-income	115	8.1	109	8.1	6	8.8	0	0	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	1,412	100.0	1,344	100.0	68	100.0	0	.0	
Percentage of Total Farms:				95.2		4.8		.0	

2017 FFIEC Census Data and 2017 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance with regard to the geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers reflects good penetration among individuals of different income levels and businesses and farms of different sizes. Five Star exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms. In addition, the bank is a leader in making community development loans, and makes use of innovative and flexible lending practices in serving assessment area credit needs.

Lending Activity

Five Star's lending activity demonstrated good responsiveness to the retail credit needs of the Non Metropolitan assessment area. Five Star originated 612 home purchase, 1,338 refinance, 1,158 home improvement, 789 small business, 90 small farm, and 2,761 consumer loans during the evaluation period in the assessment area. Five Star ranked either first or second in deposit market share throughout the evaluation period, while lending market shares were slightly lower. In 2017, Five Star ranked 3rd in HMDA lending out of 229 reporting institutions and ranked 13th in small business lending out of 80 CRA reporting institutions.

Volume trends during the evaluation period were similar to the aggregate performance over the same period. Peer comparisons based on the number of loans per billion dollars of deposits in 2017 indicate that the bank's performance was below the lending volume of peer banks.

Geographic Distribution of Loans

Five Star's overall geographic distribution of loans reflects good penetration throughout the assessment area. The lending performance is based on good HMDA, good small business, and good consumer penetration in low- and moderate-income geographies. Small farm lending was not evaluated, as the volume was insufficient to obtain meaningful conclusions. A detailed discussion of HMDA-reportable, small business, and consumer lending in relation to the aggregate and census demographics is provided below.

Overall loan penetration of census tracts of different income levels was good, exceeding 90.0 percent of all tracts in the Non Metropolitan assessment area when consumer lending is considered along with HMDA and small business lending. Lending fell to 76.9 percent in moderate-income

tracts in 2014 and 84.6 percent in 2013. HMDA lending occurred in 54.5 percent of all census tracts, small business lending occurring in 45.1 percent of all census tracts. Lower penetration was noted in low-income census tracts primarily due to low owner-occupancy rates and high percentage of rental properties. Further, businesses are primarily located in middle-income census tracts.

HMDA lending opportunities in low-income census tracts were limited as reflected in the demographics of the assessment area and, as a result, the review only evaluated the bank's performance in the moderate-income census tracts. Based on the 2015 ACS, only 0.7 percent of the available owner-occupied housing units were located within the four low-income census tracts in the assessment area. From 2013 through 2016, the 2010 Census reported that only 0.5 percent of the available owner-occupied housing units were located within the two low-income census tracts in the assessment area. The aggregate performance further reflects the limited opportunity for HMDA-related lending. In 2013, 49 HMDA-reportable loans were made in low-income census tracts, while in 2017 only 35 loans were made in low-income census tracts.

Home Purchase

The geographic distribution of home purchase loans reflects good penetration throughout the assessment area, including moderate-income census tracts. In 2017, Five Star made 5.8 percent of its home purchase loans in moderate-income census tracts by number and 4.0 percent by dollar volume. The bank's performance is comparable to the 6.5 percent of owner-occupied housing units located in moderate-income census tracts. Five Star's performance in moderate-income census tracts was comparable to the aggregate by number (6.2 percent) and dollar volume (3.5 percent). Home purchase lending in moderate-income census tracts in 2014, 2015 and 2016 was comparable to 2017's performance, while 2013 exceeded 2017's performance.

Refinance

The geographic distribution of refinance loans reflects good penetration throughout the assessment area, including moderate-income census tracts. In 2017, Five Star made 3.3 percent by number and 2.1 percent by dollar volume of its refinance loans in moderate-income census tracts, which was below the demographic of 6.5 percent of owner occupied-housing units located in moderate-income census tracts. The bank's performance was comparable to the aggregate, which made 5.0 percent by number and 3.0 percent by dollar volume in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts in each prior year of the review period was comparable to 2017's performance.

Home Improvement

The geographic distribution of home improvement loans reflects good penetration throughout the assessment area, including moderate-income census tracts. In 2017, Five Star made 7.5 percent of its home improvement loans by number and 3.5 percent by dollar in moderate-income census tracts. The bank's performance is comparable by number to the 6.5 percent of owner-occupied housing units located in moderate-income census tracts. Five Star's performance was also comparable to the aggregate, which made 6.4 percent by number and 4.5 percent by dollar volume of its home improvement loans in moderate-income census tracts. While home improvement lending in moderate-income census tracts in each of the prior years in the review period was below 2017 lending, performance was comparable to the aggregate and demographic.

Please refer to Appendix A for the geographic distribution tables of HMDA-reportable loans in the assessment area for 2013 through 2017.

Small Business

The geographic distribution of small business loans reflects good penetration throughout the assessment area when evaluated for both low- and moderate-income census tracts. In 2017, Five Star made 0.9 percent by number and 4.2 percent by dollar volume of its small business loans in low-income census tracts, which was below (by number) the demographic of 3.9 percent. The bank was also below the aggregate by number (3.3 percent) and was comparable by dollar volume (3.8 percent). The bank's small business lending in low-income census tracts in all prior years of the review period was generally comparable with 2017 lending. Further, Five Star's small business lending in low-income census tracts in 2013, 2014, and 2015 was comparable to both the aggregate and demographic; however, lending in 2016 was below.

In 2017, the bank made 6.0 percent by number and 5.3 percent by dollar volume of its small business loans in moderate-income census tracts, which is below the 9.2 percent of all businesses located in moderate-income census tracts. The bank's small business lending was also below the aggregate, which made 8.4 percent by number and 9.3 percent by dollar volume of its small business loans in moderate-income census tracts. The bank's small business lending in 2013 and 2015 was comparable to 2017 lending in moderate-income census tracts, while 2016 was below 2017 lending levels, and 2014 exceeded 2017 lending levels. In comparison to the aggregate, the bank's lending in 2013, 2014, and 2015 was comparable, while 2016 performance was below. Further, the bank's performance compared to the demographic in 2013, 2015, and 2016 was below, while 2014 lending was comparable.

Please refer to Appendix A for the geographic distribution tables of small business loans in the assessment area for 2013 through 2017.

Consumer

The geographic distribution of consumer loans reflects good penetration throughout the assessment area, including low- and moderate-income census tracts. In 2017, Five Star made 0.8 percent by number and dollar volume of its consumer loans in low-income census tracts, which is comparable to the 1.9 percent of all households located in low-income census tracts. Five Star's consumer lending in low-income census tracts in all prior years of the review period was generally comparable with 2017 performance.

In 2017, Five Star made 6.8 percent by number and 7.0 percent by dollar volume of its consumer loans in moderate-income census tracts, which is comparable to the 8.8 percent of all households located in moderate-income geographies. Five Star's consumer lending in moderate-income census tracts in all prior years of the review period was comparable with 2017's lending performance.

Please refer to Appendix A for the geographic distribution tables of consumer loans in the assessment area for 2013 through 2017.

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

The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and of businesses and farms of different sizes. The bank's performance is based on excellent HMDA, excellent consumer, good small business, and adequate small farm lending distribution. A detailed discussion of HMDA-reportable, small business, small farm, and consumer lending in relation to aggregate and census demographics is provided below.

Home Purchase

Five Star's distribution of home purchase loans reflects excellent penetration among individuals of different income levels. The bank's performance is based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. Opportunities for home purchase lending to low-income borrowers were impacted by the number of borrowers with incomes below the poverty level. In 2017, 20.5 percent of the families in the assessment area were low-income, and nearly half had incomes below the poverty level.

In 2017, Five Star made 6.7 percent of its home purchase loans by number and 4.0 percent by dollar volume to low-income borrowers, comparable to the aggregate by number (7.6 percent) and by dollar volume (3.7 percent). The bank's home purchase lending to low-income borrowers in 2014 was below 2017 lending, while 2013 and 2015 was comparable, and 2016 exceeded. The bank's lending to low-income borrowers in 2013, 2014, and 2015 was comparable to the aggregate, while 2016 exceeded performance. Performance in all years of the review period was below the demographic.

In 2017, Five Star made 41.7 percent by number and 36.3 percent by dollar volume of its home purchase loans to moderate-income borrowers, which exceeded the aggregate performance of 21.8 percent by number and 14.5 percent by dollar volume. The bank's lending also exceeded the demographics of 18.4 percent of moderate-income families in assessment area. The bank's lending in all prior years of the review period was below 2017 lending to moderate-income borrowers. Five Star's lending in 2013 and 2016 exceeded the aggregate, while 2014 and 2015 was comparable. Performance in all years of the review period exceeded or was comparable to the demographic.

Refinance

Five Star's distribution of refinance loans reflects good penetration among individuals of different income levels. The bank's performance is based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2017, Five Star made 10.6 percent by number and 6.9 percent by dollar volume of its refinance loans to low-income borrowers, below the demographic of 20.5 percent of low-income the families in the assessment area. However, Five Star's performance exceeded the aggregate, which made 7.5 percent by number and 4.3 percent by dollar volume of refinance loans to low-income borrowers. The bank's performance in all years of the review period was generally consistent with 2017 lending.

In 2017, Five Star made 25.2 percent by number and 21.6 percent by dollar volume of its refinance loans to moderate-income borrowers, exceeding the 18.4 percent of moderate-income families in the assessment area. The bank's performance also exceeded the aggregate, which made 18.0 percent by number and 12.6 percent by dollar volume. Five Star's performance in 2017 was consistent with all prior years of the review period, with the exception of 2014, which was below the bank's lending levels, but comparable to the aggregate.

Home Improvement

Five Star's distribution of home improvement loans reflects excellent penetration among individuals of different income levels. The bank's performance is based on good distribution to

low-income borrowers and excellent distribution to moderate-income borrowers. In 2017, the bank made 20.8 percent by number and 7.8 percent by dollar volume of home improvement loans to low-income borrowers. By number, the bank's performance is comparable to the demographic as 20.5 percent of the families in the assessment area are low-income. Five Star exceeded the aggregate performance by number (14.4 percent) and was comparable to the aggregate by dollar volume (6.5 percent). The bank's home improvement lending to low-income borrowers in 2013, 2014 and 2016 was comparable to the aggregate but below the demographic and 2017 lending to low-income borrowers. In 2015, Five Star's home improvement lending to low-income borrowers was below the aggregate, the demographic, and 2017 lending to low-income borrowers.

In 2017, Five Star made 26.6 percent by number and 21.2 percent by dollar volume of its home improvement loans to moderate-income borrowers, which exceeded the 18.4 percent of moderate-income families in the assessment area. The bank exceeded the aggregate of 23.0 percent by number and 15.9 percent by dollar volume. The bank's home improvement lending to moderate-income borrowers in all prior years of the review period was comparable to 2017 lending. Five Star exceeded the aggregate in 2014 and was comparable in performance in 2013, 2015, and 2016. Further, the bank consistently exceeded the demographic in all prior years of the review period.

Please refer to Appendix A for the borrower distribution tables of HMDA-reportable loans in the assessment area for 2013 through 2017

Small Business

The borrower distribution of small business lending reflects good penetration of businesses of different sizes. In 2017, 86.9 percent of businesses in the assessment area had gross annual revenues (GAR) of \$1 million or less. Five Star's lending was below the demographic in 2017 as it made 69.2 percent of its loans by number and 44.5 percent by dollar volume to businesses with GAR of \$1 million or less. The bank's lending exceeded the aggregate of 51.1 percent by number and 38.2 percent by dollar volume of its loans to businesses with GAR of \$1 million or less. Of the 81 loans originated to small businesses in 2017, 87.7 percent were in amounts of \$100,000 or less, which are considered most beneficial to small businesses. The bank's small business lending in all prior years of the review period exceeded 2017 lending and the aggregate performance. Further, the bank's small business lending in the prior years of the review period was more comparable to the percentage of businesses with GAR of \$1 million or less operating in the assessment area.

Please refer to Appendix A for the borrower distribution tables of small business loans in the assessment area for 2013 through 2017.

Small Farm

The borrower distribution of small farm lending reflects adequate penetration of farms of different sizes. In 2017, Five Star made 43.8 percent of its farm loans by number and 11.3 percent by dollar volume to farms in the assessment area with GAR of \$1 million or less. The bank's performance was below the demographic of 95.2 percent of farms in the assessment area with GAR of \$1 million or less. Performance was also below the aggregate, which made 57.3 percent by number and 64.4 percent by dollar volume to farms with GAR of less than \$1 million. Of the seven loans originated to small farms, 85.7 percent were in amounts of \$100,000 or less, which are considered most beneficial to small farms. The bank's small farm lending in all prior years of the review period exceeded 2017's lending; however, performance has steadily declined from 2013 to 2017. Five Star's small farm lending in all prior years of the review period was consistently below the aggregate and demographic.

Please refer to Appendix A for the borrower distribution tables of small farm loans in the assessment area for 2013 through 2017.

Consumer

The borrower distribution of consumer lending reflects excellent penetration among individuals of different income levels. The performance is based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2017, Five Star made 12.8 percent by number and 9.6 percent by dollar volume of its consumer loans to low-income borrowers. The bank's performance is below the 24.3 percent of low-income households in the assessment area. Consumer lending in all prior years of the review period was comparable with 2017 performance.

In 2017, Five Star made 29.5 percent by number and 27.4 percent by dollar volume of its consumer loans to moderate-income borrowers, exceeding the 16.4 percent of moderate-income households in the assessment area. Consumer lending in all prior years of the review period was generally comparable with 2017 performance.

Please refer to Appendix A for the borrower distribution tables of consumer loans in the assessment area for 2013 through 2017.

Community Development Lending

Five Star is a leader in making community development loans in the Non Metropolitan assessment area. During the review period the bank made 42 community development loans totaling \$26.9 million. Peer comparisons with other banking institutions in the assessment area indicate that Five Star is a leader in community development lending in terms of annualized community development loans to deposits in the assessment area.

Community Development Loans		
Purpose	#	\$(000s)
Affordable Housing	7	\$6,413
Economic Development	3	\$8,508
Community Services	32	\$12,014
Revitalize and Stabilize	0	\$0
Totals	42	\$26,935

Efforts were distributed among the applicable categories of community development lending, with an emphasis, in terms of dollar amounts on community development services, as noted in the table above.

Examples of community development lending include:

- A \$1.3 million bridge loan million to a local development corporation for the acquisition of land for a semi-conductor plant. Construction of the semi-conductor plant will bring jobs to western New York, many of which will be to low- and moderate-income individuals.
- A \$2.3 million loan to refinance a 76-unit apartment complex in Painted Post, NY. All units in the project receive Section 8 financing from HUD. Proceeds of the loan will be utilized to refinance existing debt on the property.
- A \$500,000 line of credit to a non-profit organization that provides specialized programs to the residents of Cattaraugus County, benefitting low- and moderate-income families and individuals. Services include weatherization programs, nutrition, homeless services, and domestic violence programs.
- A \$500,000 line of credit to a non-profit organization that provides services to the residents of Steuben County. Services include Head Start programs in many of the towns in Steuben and Yates Counties, which offer a wide range of social and educational experiences to children and families, helping with the transition into kindergarten.

INVESTMENT TEST

Five Star made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, and occasionally in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives, exhibiting good responsiveness to credit and community development needs of the assessment area.

Community Development Investments		
Purpose	#	\$(000s)
Affordable Housing	8	\$2,660
Community Services	44	\$1,761
Economic Development	0	\$0
Revitalize and Stabilize	107	\$18,642
Totals	159	\$23,063

Qualified investments totaled \$23.1 million, or 27.2 percent of Five Star’s total qualified investment activity. Of Five Star’s qualified investments in the Non Metropolitan assessment area, 98.2 percent were new investments made since the prior CRA evaluation. Qualified investments in the Non Metropolitan assessment area included:

- Investment of \$12.9 million in municipal bonds of various cities and towns throughout the Non Metropolitan assessment area. Proceeds were utilized to assist in revitalizing low- and moderate-income areas through maintenance of essential infrastructure. Examples included the acquisition of ambulances, police and fire vehicles, infrastructure repairs to roads, sidewalks, utility upgrades, and improvements to water districts.
- Investment of \$7.4 million in municipal bonds for twelve school districts, where the majority of students received free or reduced rate lunches. The bonds financed the acquisition of school busses, financed the reconstruction and additions to school buildings, and capital improvements such as enhancements to technological resources.
- Investments of \$2.7 million in mortgage backed securities that supported affordable housing.
- Grants and donations totaling \$110.6 thousand that supported community service activities of several non-profit organizations.

SERVICE TEST

Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment area. Five Star's record of opening and closings of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low-and moderate-income individuals. Services do not vary in a way that inconveniences the bank's assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. The bank provides a relatively high level of community services to the assessment area.

Retail Services

Five Star's delivery systems are readily accessible to the bank's geographies and individuals of differing income levels in its assessment area. Five Star has 25 branches in the assessment area, of which four, or 16.0 percent, are located in low- or moderate-income census tracts. This compares favorably to the 10.3 percent of the assessment areas population that resides in low- or moderate-income census tracts. Additionally, the census tract where Five Star's branch in Chautauqua County is located was considered (2014) a distressed middle-income census tract due to poverty designation.

Five Star's record of opening and closings of branches in the assessment area has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low-and moderate-income individuals. During the evaluation period, Five Star closed two branches in middle-income geographies. Both branches were closed to address redundancies that were a result of the bank's acquisition of eight branches from First Niagara Bank.

Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. All products and services are available at each branch location. Approximately 73.0 percent of the Five Star branches have Saturday lobby hours and Saturday drive-in hours. Further, one of the four branches (25.0 percent) located in low- or moderate-income census tracts has Saturday lobby hours and Saturday drive-in hours

Community Development Services

Five Star provides a relatively high level of community development services in the assessment area. As presented in the table below, Five Star conducted 52 community service events in the

assessment area. The services consisted of a wide variety of events related to the financial education of children and adults, small business technical assistance, and participation with organization promoting economic development and workforce training.

Summary of Community Development Services Non Metropolitan Assessment Area October 1, 2013 – September 30, 2018	
Activity Type	Current Evaluation Total
Residential Mortgage/First-time Homebuyers Seminars	1
Technical Assistance to Small Businesses	33
Financial Literacy Events	18
TOTAL ACTIVITY	52

Bank officers and senior staff also served on the boards and committees of 33 community development organizations that provided on-going financial and management expertise and to organizations focused on low- and moderate-income youth, children in foster care, support for homeless individuals and supportive housing for at-risk and disabled individuals.

Examples of services include:

- A bank officer served on the Board of Directors of an organization that provides a variety of services to children from low- or moderate-income families.
- Bank officers facilitated financial literacy programs and first-time home buyer seminars in low- and moderate-income geographies.
- A bank officer served on the Board of Directors of an organization that provides affordable housing to low- and moderate-income individuals and families.

METROPOLITAN AREA (FULL REVIEW)

MSA 40380 (Rochester, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS

As of December 31, 2017, Five Star operated 22 of 54 branches (40.7 percent) in the assessment area. These branches generated \$1.2 billion in deposits, which accounts for 36.0 percent of the bank's total branch deposits as of June 30, 2018. Of the bank's total HMDA, small business, small farm, and consumers loans originated from 2013 through 2017, 48.7 percent were originated in MSA 40380 (Rochester, NY).

Five Star ranked seventh in deposit market share in the assessment area, accounting for 6.2 percent of assessment area deposits. Other lead banks in terms of deposit market share are: M&T Bank, JPMorgan Chase Bank, KeyBank, Canandaigua National Bank, Citizens Bank and Bank of America.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which Five Star operates. Information was obtained from publicly available sources, including the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

The MSA 40380 (Rochester, NY) assessment area includes Livingston, Monroe, Ontario, Orleans, Wayne, and Yates Counties. According to the 2015 ACS, the population of the assessment area was approximately 1.1 million, with 69.2 percent residing in Monroe County, which includes the City of Rochester. The other four counties are predominately rural and suburban and are much less densely populated. Monroe County's population density is approximately seven times higher than the rest of the metropolitan area. The assessment area consists of 272 census tracts, of which 44 are low-income, 44 are moderate-income, 114 are middle-income, 61 are upper-income and nine are unknown-income.

Income Characteristics

MSA 40380 (Rochester, NY) has 268,759 families, of which 21.9 percent are considered low-income, 17.1 percent are moderate-income, and 10.4 percent have incomes below the poverty level. According to FFIEC data, the median family income for the assessment area was consistently below the State of New York. Of the counties that comprise the assessment area, Ontario County had the highest median family income, while Yates County had the lowest according to 2010 data and Orleans County had the lowest based on the 2015 data. Further, Ontario County exceeded the State of New York’s median family income based on 2010 data and was comparable to the state according to the 2015 data.

Median Family Income		
County	2010	2015
Assessment Area	\$64,012	\$67,424
Livingston	\$63,539	\$67,532
Monroe	\$65,240	\$69,363
Ontario	\$69,877	\$71,483
Orleans	\$58,535	\$55,530
Wayne	\$60,324	\$61,933
Yates	\$56,538	\$61,588
State of New York	\$67,405	\$71,913

Housing Characteristics

According to the 2015 ACS, the MSA 40380 (Rochester, NY) has 473,557 housing units, of which 61.2 percent are owner-occupied and 29.7 percent are rental units. Of the available owner-occupied units, 14.7 percent are located in low- and moderate-income geographies. Over three-quarters of the housing units in the low-income census tracts are either rental or vacant (78.3 percent), and 21.6 percent are owner-occupied. In the moderate-income census tracts, over half (53.9 percent) of the housing units are either rental or vacant, and 46.1 percent are owner-occupied.

The 2015 ACS shows the median age of housing stock in the assessment area was 57 years old, with 34.0 percent of the stock built before 1950. In low- and moderate-income census tracts, the median age of housing stock was 61 years, which indicates there is potential opportunity to make home improvement loans.

According to the 2015 ACS, the median housing value in the assessment area was \$133,481, with an affordability ratio of 39.3. The median housing values increased in all five counties between 2010 and 2015 and household incomes also increased; however, housing only became slightly more affordable in Monroe and Wayne Counties. During the review period, the most affordable

housing was in Orleans County, which had an affordability ratio of 50.8. Median gross rents substantially increased across all of the assessment area, with renters in Yates County experiencing the largest increase in rental rates; however, in all counties rents were affordable, representing only 14.3 percent of income in the MSA. The table below presents housing characteristics from the U.S. Census and ACS between 2010 and 2015 in the assessment area and the State of New York.

County	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change (Rent)
Livingston	\$112,300	46.0	\$121,200	42.7	\$664	\$721	8.6%
Monroe	\$130,400	39.3	\$138,600	37.9	\$757	\$826	9.1%
Ontario	\$129,600	43.6	\$145,700	39.4	\$711	\$809	13.8%
Orleans	\$86,400	55.6	\$91,300	50.8	\$630	\$639	1.4%
Wayne	\$107,400	48.9	\$112,900	45.0	\$657	\$694	5.6%
Yates	\$114,200	41.00	\$124,200	39.9	\$559	\$688	23.1%
MSA 40380 Rochester, NY	\$124,065	41.62	\$133,481	39.3	\$737	\$805	9.2%
State of New York	\$303,900	18.3	\$283,400	20.9	\$977	\$1,132	15.9%

Labor, Employment and Economic Characteristics

According to the New York State Department of Labor, key industries in the MSA 40380 (Rochester, NY) had been photographic equipment and related manufacturing, which resulted in a well-educated, high-tech workforce. Prior to 2000, its industry mix and the presence of a number of large multinational headquarters had enabled the local economy to weather recessions better than other areas of the state. However, the MSA sustained significant job losses during the 2008 recession and has not fully recovered. Currently, education and healthcare are the dominant industries, with the University of Rochester as the largest employer, accounting for over 29,000 jobs. Rochester Regional Health and Wegmans Food Markets Inc. are the second and third leading employers in the assessment area. Unemployment rates for the assessment area continue to trend downward, consistent with the nationwide average. Within the assessment area counties, unemployment rates ranged from a high of 9.1 percent in 2013 to a high of 5.9 percent in 2017.

Comparatively, statewide unemployment rates ranged from 8.4 percent in 2013 to 5.7 percent in 2017.

U.S. Department of Labor Annual Unemployment Rates					
Area	2013	2014	2015	2016	2017
Livingston	7.0	5.8	5.3	4.9	5.0
Monroe	7.0	5.8	5.1	4.7	4.9
Ontario	6.3	5.2	4.7	4.3	4.5
Orleans	9.1	7.7	6.4	5.7	5.9
Wayne	7.6	6.2	5.3	5.0	5.0
Yates	6.8	5.7	5.0	4.4	4.4
State of New York	8.4	6.9	6.3	5.8	5.7

Additional performance context data for the assessment area is provided in the MSA 40380 (Rochester, NY) Assessment Area Demographics table on the next page.

Assessment Area Demographics
MSA 40380 - 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	44	16.2	20,378	7.6	8,945	43.9	58,942	21.9
Moderate-income	44	16.2	34,370	12.8	6,724	19.6	46,080	17.1
Middle-income	114	41.9	133,537	49.7	9,942	7.4	53,477	19.9
Upper-income	61	22.4	80,369	29.9	2,224	2.8	110,260	41
Unknown-income	9	3.3	105	0	4	3.8	0	0
Total Assessment Area	272	100.0	268,759	100.0	27,839	10.4	268,759	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	44,930	9,726	3.4	21.6	27,773	61.8	7,431	16.5
Moderate-income	71,159	32,781	11.3	46.1	30,673	43.1	7,705	10.8
Middle-income	233,103	154,219	53.2	66.2	56,077	24.1	22,807	9.8
Upper-income	124,078	93,238	32.1	75.1	25,715	20.7	5,125	4.1
Unknown-income	287	68	0	23.7	189	65.9	30	10.5
Total Assessment Area	473,557	290,032	100.0	61.2	140,427	29.7	43,098	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,997	8.5	2,419	7.8	550	13.9	28	7.1
Moderate-income	4,666	13.2	3,975	12.8	635	16	56	14.1
Middle-income	16,454	46.6	14,492	46.8	1,726	43.6	236	59.4
Upper-income	11,154	31.6	10,052	32.5	1,025	25.9	77	19.4
Unknown-income	57	0.2	34	0.1	23	0.6	0	0
Total Assessment Area	35,328	100.0	30,972	100.0	3,959	100.0	397	100.0
Percentage of Total Businesses:			87.7		11.2		1.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	0.4	5	0.5	0	0	0	0
Moderate-income	83	7.4	76	7.2	7	10.6	0	0
Middle-income	901	80	846	79.8	55	83.3	0	0
Upper-income	137	12.2	133	12.5	4	6.1	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,126	100.0	1,060	100.0	66	100.0	0	.0
Percentage of Total Farms:			94.1		5.9		.0	

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance with regard to the geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers reflects good penetration among individuals of different income levels and businesses and farms of different sizes. Five Star exhibits a good record of serving low-income individuals and areas and very small businesses and farms. The bank made a relatively high level of community development loans, and makes use of innovative and flexible lending practices in serving assessment area credit needs loans.

Lending Activity

Five Star's responsiveness to the retail credit needs of its assessment area was good, given the bank's capacity to meet assessment area credit needs, overall market conditions, and performance context factors. Five Star originated 593 home purchase, 1,183 refinance, 781 home improvement, 909 small business, 57 small farm and 7,778 consumer loans during the evaluation period in the assessment area. Five Star ranked seventh in deposit market share throughout the evaluation period while lending market shares were generally lower. In 2017, Five Star ranked 20th in HMDA lending out of 267 reporting institutions and ranked 21st in small business lending out of 99 CRA reporting institutions.

Peer comparisons based on the number of loans per billion dollars of deposits in 2017 indicate that the bank's performance was below the lending volume of peer banks.

Geographic Distribution of Loans

Five Star's overall geographic distribution of loans reflects good penetration throughout the assessment area. The lending performance is based on good HMDA, good small business, good consumer, and poor small farm penetration in low- and moderate-income geographies. A detailed discussion of HMDA-reportable, small business, small farm and consumer lending in relation to the aggregate and census demographics is provided below.

Overall loan penetration of census tracts of different income levels was good, exceeding 90.0 percent of all census tracts in the assessment area from 2015 to 2017 and over 80.0 percent in 2013 and 2014. HMDA lending in 65.3 percent of all census tracts during the evaluation period indicates

good penetration, while small business lending penetration in 30.9 percent of all census tracts indicates some weaknesses.

HMDA lending in low-income census tracts was impacted by the poverty rate of 43.9 percent based on the 2015 ACS (42.0 percent according to the 2010 Census). Lending opportunities were further limited, as 61.8 percent of all housing units in low-income census tracts were rental properties, based on the 2015 ACS (57.6 percent according to the 2010 Census). In addition, only 3.4 percent, according to the 2015 ACS (3.1 based on the 2010 Census) of all owner-occupied housing in the assessment area were located in low-income census tracts.

Home Purchase

The geographic distribution of home purchase loans reflects excellent penetration throughout the assessment area. Performance was based on good penetration in low-income census tracts and excellent penetration in moderate-income census tracts. In 2017, the bank made 10.1 percent by number and 5.3 percent by dollar volume of home purchase loans in low-income census tracts. The bank's performance, by number, exceeds the 3.4 percent of owner-occupied housing units located in low-income census tracts. Five Star also exceeded the aggregate, which made 2.4 percent by number and 1.4 percent by dollar volume in low-income census tracts. The bank's home purchase lending in low-income census tracts in all prior years of the review period was below 2017 lending. Further, Five Star's lending in all prior years was generally comparable to the aggregate; however, performance was below or comparable to the demographic.

In 2017, Five Star made 24.7 percent by number and 16.6 percent by dollar volume of its home purchase loans in moderate-income census tracts. The bank's performance exceeds the 11.3 percent of all owner-occupied housing units located in moderate-income census tracts. Five Star's performance was also above the aggregate, which made 11.6 percent by number and 7.3 percent by dollar volume of its home purchase loans in moderate-income census tracts. While the bank's home purchase lending in moderate-income census tracts in all prior years of the review period was below 2017 lending, the bank's lending in all prior years of the review period generally exceeded the aggregate and demographic.

Refinance Loans

The geographic distribution of refinance loans reflects good penetration throughout the assessment area, attributable to its lending in moderate-income census tracts. The bank's performance in low-income census tracts was poor, impacted by demographic (poverty rate, rental units, and percentage of owner-occupied housing) factors. Five Star did not make any refinance loans in

low-income census tracts in 2017. Performance was below the demographics of the assessment area as 3.4 percent of all owner-occupied housing are located in low-income census tracts. The bank's performance was below the aggregate, which only made 2.4 percent by number and 1.5 percent by dollar volume of it is refinance loans in low-income census tracts. Lending in all prior years of the review period was comparable to 2017 performance.

In 2017, Five Star made 10.9 percent by number and 7.6 percent by dollar volume of its refinance loans in moderate-income census tracts. The bank's performance by number is comparable to the demographic as 11.3 percent of all owner-occupied housing units are located in moderate-income census tracts. Five Star's performance was also comparable to the aggregate, which made 10.1 percent of its refinance loans by number and 6.6 percent by dollar volume in moderate-income census tracts. The bank's lending in 2013 and 2015 was comparable to 2017, while 2014 and 2016 lending was below. Further, the bank's refinance lending in moderate-income census tracts in all prior years of the review period was generally comparable to the aggregate and demographic.

Home Improvement

The geographic distribution of home improvement loans reflects good penetration throughout the assessment area. The performance was based on the bank's adequate penetration in low-income census tracts and good penetration in moderate-income census tracts. Five Star did not make any home improvement loans in low-income census tracts in all of the years included in the review period except for 2015, when the bank made four home improvement loans. The bank's performance in low-income census tracts can be attributed to demographic (poverty rate, rental units, and percentage of owner-occupied housing) factors resulting in limited lending opportunities. Five Star's home improvement lending was slightly below the aggregate for 2013, 2014, 2016 and 2017; however, 2015 performance was comparable.

In 2017, Five Star made 11.8 percent by number and 9.1 percent by dollar volume of its home improvement loans in moderate-income census tracts. The bank's performance is comparable to the demographic of 11.3 percent of all owner-occupied housing units located in moderate-income census tracts. Five Star's performance was below the aggregate by number (14.9 percent) but was comparable by dollar volume (10.7 percent). Home improvement lending in moderate income-census tracts in 2013 and 2016 was comparable to 2017 lending, while 2014 and 2015 was below. Five Star home improvement lending in moderate-income census tracts was also comparable to the aggregate in 2013, 2014, and 2016; however, 2015 lending was below.

Please refer to Appendix A for the geographic distribution tables of HMDA-reportable loans in the assessment area for 2013 through 2017.

Small Business

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The performance is based on adequate penetration of loans in low-income census tracts and good penetration of loans in moderate-income census tracts. In 2017, the bank made 5.4 percent by number and 7.6 percent by dollar volume of its small business loans in low-income census tracts. The bank's performance is below the demographic of the assessment area, where 8.5 percent of total businesses operate. Small business performance was comparable to the aggregate by number (7.9 percent) and dollar volume (9.8 percent). The bank's small business lending in low-income census tracts in 2015 was comparable to 2017 lending, while 2014, 2015, and 2016 lending was below 2017 activity. Further, the bank's small business lending in low-income census tracts was below the aggregate in 2013, 2014, and 2016 but was comparable in 2015.

In 2017, Five Star made 13.4 percent by number and 11.4 percent by dollar volume of its small business loans in moderate-income census tracts. The bank's performance was comparable to the demographics of the assessment area, where 13.2 percent of total businesses operate in moderate income census tracts. Five Star's small business lending in moderate-income census tracts exceeded the aggregate by number (11.2 percent) and was comparable by dollar volume (13.0 percent). The bank's small business lending in 2014, 2015, and 2016 was below 2017 performance, while 2013 exceeded 2017.

Please refer to Appendix A for the geographic distribution tables of small business loans in the assessment area for 2013 through 2017.

Small Farm

The geographic distribution of small farm loans reflects poor penetration throughout the assessment area. The performance was only based on the bank's penetration in moderate-income census tracts. In 2017, opportunities for small farm lending in low-income census tracts was very limited as only five farms were located in low-income census tracts, while 83 or 7.4 percent of all farms were located in moderate-income census tracts.

In 2017, Five Star made one small farm loan or 14.3 percent of its small farm loans in moderate-income census tracts, which exceeded the demographic (7.4 percent). The bank's performance was above the aggregate, which made 8.1 percent of its small farm loans in moderate-income

census tracts. The bank's lending in all prior years of the review was below 2017 performance, as the bank did not originate any small farm loans in moderate-income census tracts.

Please refer to Appendix A for the geographic distribution tables of small farm loans in the assessment area for 2013 through 2017.

Consumer

The geographic distribution of consumer loans reflects good penetration throughout the assessment area. The bank's performance is based on adequate penetration in low-income census tracts and good penetration in moderate-income census tracts. In 2017, Five Star made 5.0 percent by number and 5.2 percent by dollar volume of its consumer loans in low-income census tracts. The bank's performance was below the 8.7 percent of all households in low-income census tracts. Five Star's consumer lending in all prior years of the review period was generally comparable to 2017 performance in low-income census tracts.

In 2017, the bank made 14.1 percent by number and 14.3 percent by dollar volume of its consumer loans in moderate-income census tracts. The bank's performance is comparable to the 14.7 percent of all households in moderate-income census tracts. The bank's consumer lending in all prior years of the review period was comparable to 2017's performance in moderate-income census tracts.

Please refer to Appendix A for the geographic distribution tables of consumer loans in the assessment area for 2013 through 2017.

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

The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and of businesses and farms of different sizes. The bank's performance is based on good HMDA, good small business, good small farm, and excellent consumer lending distribution. A detailed discussion of HMDA-reportable, small business, small farm, and consumer lending in relation to aggregate and census demographics is provided below.

Home Purchase

Five Star's distribution of home purchase loans reflects good penetration among individuals of different income levels. The performance is based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. Opportunities for home purchase

lending to low-income borrowers was impacted by the high cost of housing in relation to income. In 2017, the assessment area's median cost of a home was four times the income of a low-income borrower. In addition, 21.9 percent of the families in the assessment area were low-income in 2017, but nearly half had incomes below the poverty line, further impacting lending opportunities.

In 2017, Five Star made 24.1 percent by number and 13.7 percent by dollar volume of its home purchase loans to low-income borrowers. The bank's performance by number exceeded the demographic of 21.9 percent of low-income families in the assessment area. The bank's performance also exceeded the aggregate, which made 7.5 percent by number and 4.1 percent by dollar volume of its home purchase loans to low-income borrowers. The bank's home purchase lending to low-income borrowers in all prior years of the review period was below 2017 lending and the demographic. Further, the bank's home purchase lending to low-income borrowers in 2013 and 2014 was below the aggregate, while 2015 and 2016 exceeded the aggregate.

In 2017, Five Star made 29.1 percent by number and 21.1 percent by dollar volume of its home purchase loans to moderate-income borrowers. The bank's performance exceeded the aggregate, which made 20.7 percent by number and 15.1 percent by dollar volume. The bank's performance also exceeded the demographic of 17.1 percent of moderate-income families in the assessment area. The bank's home purchase lending to moderate-income borrowers in all prior years of the review period was below 2017 lending. Further, the bank's performance in all prior years of the review period exceeded or was comparable to the aggregate and demographic.

Refinance

Five Star's distribution of refinance loans reflects good penetration among individuals of different income levels. The performance is based on adequate distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2017, Five Star made 5.8 percent by number and 2.4 percent by dollar volume of its refinance loans to low-income borrowers. The bank's performance is below the 21.9 percent of low-income families in the assessment area. Performance was comparable to the aggregate, which made 7.5 percent by number and 4.2 percent by dollar volume of refinance loans to low-income borrowers. Five Star's refinance lending to low-income borrowers in 2013, 2014, and 2015 was comparable to 2017 lending, while 2016 exceeded. Lending in all prior years of the review period either exceeded or was comparable to the aggregate; however, performance in all years was below the demographic.

In 2017, Five Star made 21.9 percent by number and 15.2 percent by dollar volume of its refinance loans to moderate-income borrowers, exceeding (by number) the 17.1 percent of moderate-income families in the assessment area. Performance exceeded the aggregate, which made 17.6 percent

by number and 12.6 percent by dollar volume of refinance loans to moderate-income borrowers. Five Star's refinance lending to moderate-income borrowers in 2016 was below 2017 lending, while 2013, 2014, and 2015 lending was comparable. Refinance lending to moderate-income borrowers in all years of the review period was comparable or exceeded the aggregate and demographic.

Home Improvement

Five Star's distribution of home improvement loans reflects good penetration among individuals of different income levels. The performance is based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2017, 14.3 percent of home improvement loans by number and 4.6 percent by dollar volume were made to low-income borrowers, which is below the 21.9 percent of low-income families in the assessment area. Lending exceeded the aggregate by number (10.2 percent) and was comparable by dollar volume (4.4 percent). Home improvement lending to low-income borrowers in 2013 was comparable to 2017 lending, while 2014, 2015, and 2016 exceeded. The bank's home improvement lending to low-income borrowers in all prior years of the review period exceeded the aggregate; however, performance was consistently below the demographic.

In 2017, Five Star made 29.4 percent by number and 19.0 percent by dollar volume of its home improvement loans to moderate-income borrowers. The bank exceeded the 17.1 percent of moderate-income families in the assessment area and the aggregate of 22.8 percent by number and 13.0 percent by dollar volume. Home improvement lending to moderate-income borrowers in 2014 and 2016 was below 2017 lending, while 2013 and 2015 lending was comparable. Home improvement lending to moderate-income borrowers in all prior years of the review period exceeded or was comparable to the aggregate and demographic.

Please refer to Appendix A for the borrower distribution tables of HMDA-reportable loans in the assessment area for 2013 through 2017.

Small Business

The borrower distribution of small business lending reflects good penetration of businesses of different sizes. In 2017, 87.7 percent of businesses in the assessment area had GAR of \$1 million or less. Five Star's performance was below the demographic as the bank made 61.7 percent of its business loans by number and 31.6 percent by dollar volume to small businesses. However, performance was above the aggregate, which made 48.8 percent by number and 31.5 percent by dollar volume. Of the 92 loans originated to small businesses, 84.8 percent were in amounts of

\$100,000 or less, which are considered most beneficial to small businesses. Five Star's small business lending in 2014, 2015, and 2016 exceeded 2017 lending, while 2013 was comparable. Further, the bank's small business lending in all prior years of the review period exceeded the aggregate but was consistently below the demographic.

Please refer to Appendix A for the borrower distribution tables of small business loans in the assessment area for 2013 through 2017.

Small Farm

The borrower distribution of small farm lending reflects good penetration of farms of different sizes. In 2017, 94.1 percent of farms in the assessment area had GAR of \$1 million or less. Five Star's performance was below the demographic as the bank made 85.7 percent by number and 80.5 percent by dollar volume to small farms. Performance was above the aggregate, which made 52.3 percent by number and 66.4 percent by dollar volume. Of the six loans originated to small farms, 57.1 percent were in amounts of \$100,000 or less, which are considered most beneficial to small farms. Five Star's small farm lending in 2014 and 2016 was comparable to 2017 performance, while 2013 and 2015 lending was below.

Please refer to Appendix A for the borrower distribution tables of small farm loans in the assessment area for 2013 through 2017.

Consumer

The borrower distribution of consumer lending reflects excellent penetration among individuals of different income levels. The performance is based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2017, Five Star made 16.4 by number and 13.1 percent by dollar volume of its consumer loans to low-income borrowers. The bank's performance was below the 24.4 percent of low-income households in the assessment area. Five Star's consumer lending to low-income borrowers in all prior years of the year period was consistent with 2017 performance.

In 2017, Five Star made 30.7 percent by number and 29.4 percent by dollar volume of its consumer loans to moderate-income borrowers exceeding the 16.1 percent of moderate-income households in the assessment area. The bank's consumer lending in all prior years of the review period was consistent with 2017 performance.

Please refer to Appendix A for the borrower distribution tables of consumer loans in the assessment area for 2013 through 2017.

Community Development Lending

Five Star is a leader in making community development loans. The bank made 42 loans totaling \$48.0 million, or 28.0 percent of the bank’s total community development lending. Peer comparisons with other banking institutions in the assessment area indicate that Five Star is a leader in community development lending in terms of annualized community development loans to deposits in the assessment area.

Community Development Loans		
Purpose	#	\$(000s)
Affordable Housing	10	\$12,892
Economic Development	5	\$6,694
Community Services	20	\$10,055
Revitalize and Stabilize	7	\$18,361
Totals	42	\$48,002

Efforts were distributed among the applicable categories of community development lending, with an emphasis, in terms of dollar amounts, on revitalization and stabilization development and affordable housing, as noted in the table above.

Examples of community development lending include:

- A \$2.4 million loan to finance construction and provide permanent financing for 57 units of affordable senior housing and an adult day care center.
- A \$3.7 million SBA 504 loan to a manufacturer of nut butters, roasted nuts, and honey products. Proceeds of the loan will be used to purchase high-speed manufacturing equipment that will expand the manufacturer’s production line by over 50.0 percent. According to management, expansion of the production line will create six new jobs for low- and moderate-income workers, as additional jobs will be needed to service the increased capacity.
- A \$2.5 million loan to a manufacturer of metal sheet that is located in a moderate-income tract in Rochester. The product is utilized by a variety of industries. The loan will assist in preserving jobs for low- and moderate-income workers.
- A \$700,000 loan to the Boys and Girls Club for building improvements. The club is located in a low-income area of Rochester. Boys and Girls Clubs provide community services that target youth development.

- A \$1.0 million revolving line of credit to a non-profit corporation for the purchase and rehabilitation of homes that will be sold to low- or moderate-income borrowers.

INVESTMENT TEST

Five Star made significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, and occasionally in a leadership position. The bank makes occasional use of innovative or complex investments to support community development initiatives, exhibiting good responsiveness to credit and community development needs of the assessment area.

Community Development Investments		
Purpose	#	\$(000s)
Affordable Housing	10	\$12,200
Community Services	42	\$455
Economic Development	1	\$10
Revitalize and Stabilize	37	\$6,774
Totals	90	\$19,439

During the evaluation period, community development investments in MSA 40380 (Rochester, N.Y.) totaled \$19.4 million, or 23.0 percent of all community development investment activity. While opportunities for investments in municipal securities were more limited during this evaluation, the banked acquired \$12.2 million in mortgage-backed securities, collateralized by mortgages of low- and moderate-income borrowers as an alternative to municipal investments. However, mortgage-backed securities are considered to be less complex than other types of investments. Given the significant amount of mortgage-backed securities, qualified investments were targeted primarily, by dollar amount, to affordable housing efforts; however, the majority of investments by number were targeted to both revitalization and stabilization and community services. Examples of qualified investments included:

- An investment of \$12.1 million in mortgage-backed securities that supported affordable housing for low- and moderate-income borrowers.
- An investment of \$2.6 million in municipal bonds for three school districts, where the majority of students received free or reduced rate lunches. The bonds financed the acquisition of school busses, financed the reconstruction and additions to school buildings and a new bus garage, and updates to school facilities.
- The purchase of \$923.6 thousand in municipal bonds for infrastructure repairs and improvements to water facilities in moderate-income areas of the City of Geneva.

- The purchase of municipal bonds of various municipalities totaling \$3.4 million throughout MSA 40380 (Rochester, NY). The bonds were utilized to finance infrastructure repairs in low- and moderate-income areas.
- Charitable grants and contributions to community groups totaling \$397.0 thousand

SERVICE TEST

Delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. Five Star's record of opening and closings of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low-and moderate-income individuals. Services do not vary in a way that inconveniences its assessment area, particularly for low- and moderate-income geographies and low- and moderate-income individuals. The bank is a leader in providing community development services.

Retail Services

Five Star's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. Five Star operates 22 branches in the assessment area, of which six, or 27.3 percent, are located in low- or moderate-income geographies. This compares favorably to the 23.1 percent of the population residing in low- or moderate-income census tracts.

Five Star's record of opening and closings of branches in the assessment area has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low-and moderate-income individuals. During the evaluation period, Five Star opened two branches in the City of Rochester, including one in a low-income census tract and one in a moderate-income census tract. Additionally, a third branch was opened in an upper-income tract in Brighton, New York.

Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. All products and services are available at each branch location. Approximately 73.0 percent of the Five Star branches had Saturday lobby hours and Saturday drive-up hours. Only one of the six branches (16.7 percent) located in a low- or moderate-income tracts had Saturday lobby hours and Saturday drive-in hours. However, a number of branches located in low- or moderate-income census tracts, such as the Rochester Plaza (main office), are located in business areas where there is limited

activities on weekends and insufficient retail traffic to draw clientele on weekends. All branches have 24-hour access to ATMs, which allow customers access to funds.

Community Development Services

Five Star is a leader in providing community development services. As presented in the table below, Five Star conducted 42 community service events in the assessment area. The services consisted of a wide variety of events related to the financial education of children and adults, small business technical assistance, and participation with organization promoting economic development and workforce training. Additionally, Five Star facilitated several first-time homebuyer seminars in low- and moderate-income geographies.

Summary of Community Development Services MSA 40380 (Rochester, NY) Assessment Area October 1, 2013 – September 30, 2018	
Activity Type	Current Evaluation Total
Residential Mortgage/First-time Homebuyers Seminars	15
Technical Assistance to Small Businesses	10
Financial Literacy Events	17
TOTAL ACTIVITY	42

Bank officers and senior staff also served on the boards and committees of 26 community development organizations that provided on-going financial and management expertise and to organizations focused on low- and moderate-income youth, children in foster care, support for homeless individuals and supportive housing for at-risk and disabled individuals.

Examples of services include:

- A bank officer served on the Board of Directors of the Urban League of Rochester, an organization that provides community services to low- and moderate individuals and families.
- A bank officer was a member of the Board of Directors of the Boys and Girls Club of Rochester.
- A bank officer was Treasurer of the Salvation Army of Rochester.

- Bank officers facilitated financial literacy programs and first-time home-buyer seminars through non-profit agencies such as Pathstone Enterprise Center and Neighborworks of Rochester.
- A bank officer served on the Board of Directors of the Flower City Habitat for Humanity, an organization that provides affordable housing to low- and moderate-income individuals and families.

METROPOLITAN AREA (FULL REVIEW)

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS

As of December 31, 2017, Five Star operated four of 54 branches (7.4 percent) in the assessment area. These branches generated \$174 million in deposits, which accounted for 5.3 percent of the bank's total branch deposits as of June 30, 2018. Of the bank's total HMDA, small business, small farm, and consumers loans originated from 2013 through 2017, 20.2 percent were originated in the MSA.

Five Star ranked 10th in deposit market share, accounting for 0.4 percent of assessment area deposits. Other lead banks in terms of deposit market share are: M&T Bank, KeyBank, Bank of America, Citizens Bank and Northwest Bank.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which Five Star operates. Information was obtained from publicly available sources including the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

Five Star's MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area consists of Erie County, which includes the City of Buffalo, NY. According to the 2015 ACS, the population of the assessment area was 921,584, which accounts for 35.1 percent of Five Star's combined assessment area population. Five Star's assessment area consists of 237 census tracts, of which 38 are low-income, 41 are moderate-income, 90 are middle-income, and 60 are upper-income. Eight census tracts in the assessment area had an unknown income designation.

Income Characteristics

The assessment area is home to 229,957 families, of which 22.1 percent were low-income and 16.5 percent were moderate-income. Of the total families within the assessment area, 10.9 percent had

incomes below the poverty level. In the City of Buffalo, 30.9 percent of all families had incomes below the poverty level. According to FFIEC census data, the median family income for the assessment area was consistently below the State of New York.

Median Family Income		
County	2010	2015
Assessment Area	\$62,908	\$67,541
State of New York	\$67,405	\$71,913

Housing Characteristics

According to the 2015 ACS, there are 420,782 housing units in the assessment area, of which 248,889 are owner-occupied housing. Of the total housing units located in low-income tracts, 28.9 percent are owner-occupied, 52.2 percent are rental, and 18.9 percent are vacant. In moderate-income tracts, 44.7 percent are owner-occupied, 41.5 percent are rental, and 13.8 percent are vacant. Further, of the total owner-occupied housing units, 18.6 percent are located in low- and moderate-income census tracts. This indicates there are fewer opportunities to make home mortgage loans in low- and moderate-income census tracts compared to middle- and upper-income census tracts.

The 2015 ACS shows the median age of housing stock in the assessment area was 61 years old, with 41.3 percent of the stock built before 1950. The median age of housing stock in low- and moderate-income tracts was 61 years, which indicates there is potential opportunity to make home improvement loans. The median housing value in the assessment area was \$130,000, with an affordability ratio of 39.4. The median gross rent in the assessment area was \$739 with 46.8 percent of all renters having rents exceeding 30.0 percent of their income.

County	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change (Rent)
Erie	\$117,700	40.2	\$130,000	39.4	\$686	\$739	7.7%
MSA 15380 Buffalo- Cheektowaga- Niagara Falls, NY	\$113,883	41.4	\$125,014	40.8	\$673	\$725	7.7%

State of New York	\$303,900	18.3	\$283,400	20.9	\$977	\$1,132	15.9%
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Labor, Employment and Economic Characteristics

According to the New York State Department of Labor, Western New York has experienced seven consecutive years of job growth as of June 2018. Three industry sectors, leisure and hospitality, education and health services, and financial activities were responsible for a majority of the region’s employment growth between 2013 and 2017. Average unemployment for the assessment area has shown declines from a high of 7.4 percent in 2013, to 5.1 percent in 2017.

U.S. Department of Labor Annual Unemployment Rates					
Area	2013	2014	2015	2016	2017
Erie	7.4	6.1	5.3	4.9	5.1
State of New York	8.4	6.9	6.3	5.8	5.7

The subsequent table provides a summary of the Assessment Area Demographics for MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY).

Assessment Area Demographics

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) - 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	38	16	28,377	12.3	11,024	38.8	50,917	22.1
Moderate-income	41	17.3	29,041	12.6	5,278	18.2	37,837	16.5
Middle-income	90	38	88,563	38.5	6,357	7.2	45,650	19.9
Upper-income	60	25.3	83,808	36.4	2,415	2.9	95,553	41.6
Unknown-income	8	3.4	168	0.1	55	32.7	0	0
Total Assessment Area	237	100.0	229,957	100.0	25,129	10.9	229,957	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	63,564	18,364	7.4	28.9	33,158	52.2	12,042	18.9
Moderate-income	62,212	27,805	11.2	44.7	25,794	41.5	8,613	13.8
Middle-income	162,784	104,051	41.8	63.9	47,976	29.5	10,757	6.6
Upper-income	131,298	98,622	39.6	75.1	26,380	20.1	6,296	4.8
Unknown-income	924	47	0	5.1	649	70.2	228	24.7
Total Assessment Area	420,782	248,889	100.0	59.1	133,957	31.8	37,936	9.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,770	8.6	2,260	8.1	491	12.5	19	6.1
Moderate-income	3,389	10.5	2,861	10.2	500	12.8	28	8.9
Middle-income	11,597	36.1	10,100	36.2	1,376	35.1	121	38.5
Upper-income	13,104	40.7	11,693	41.9	1,281	32.7	130	41.4
Unknown-income	1,300	4	1,015	3.6	269	6.9	16	5.1
Total Assessment Area	32,160	100.0	27,929	100.0	3,917	100.0	314	100.0
Percentage of Total Businesses:			86.8		12.2		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	15	3.9	14	3.8	1	5.6	0	0
Moderate-income	6	1.6	5	1.4	1	5.6	0	0
Middle-income	199	51.8	190	52.1	9	50	0	0
Upper-income	159	41.4	151	41.4	7	38.9	1	100
Unknown-income	5	1.3	5	1.4	0	0	0	0
Total Assessment Area	384	100.0	365	100.0	18	100.0	1	100.0
Percentage of Total Farms:			56	95.1		4.7		.3

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Five Star's performance with regard to the geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers reflects good penetration among individuals of different income levels and businesses of different sizes. The bank exhibits a good record of serving low-income individuals and areas very and small businesses. In addition, the bank is a leader in making community development loans, and makes use of innovative and flexible lending practices in serving assessment area credit needs loans.

The geographic distribution and borrower distribution of small farm lending was not evaluated, as the volume was insufficient to obtain meaningful conclusions.

Lending Activity

Five Star's responsiveness to the retail credit needs of needs of the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area was good, given the bank's capacity to meet assessment area credit needs, overall market conditions and performance context factors. Overall, Five Star originated 252 home purchase, 147 refinance, 95 home improvement, 287 small business, six small farm and 3,896 consumer loans during the evaluation period in the assessment area. Of note, HMDA volume increased significantly in 2017, as Five Star hired two additional loan officers who specialized in home mortgage lending. Five Star ranked either 10th or 11th in deposit market share throughout the evaluation period while lending market shares were lower. In 2017, Five Star ranked 19th in HMDA-reportable lending out of 244 reporting institutions, and ranked 26th in small business lending out of 96 CRA reporting institutions.

Volume trends during the evaluation period were similar to or exceeded the aggregate performance over the same period. Peer comparisons based on the number of loans per billion dollars of deposits in 2017 indicate that the bank's performance exceeded the lending volume of peer banks.

Geographic Distribution of Loans

Five Star's overall geographic distribution of loans reflects good penetration throughout the assessment area. The lending performance is based on good HMDA, good consumer, and adequate small business penetration in low- and moderate-income geographies. Small farm lending was not evaluated, as the volume was insufficient to obtain meaningful conclusions. A detailed discussion

of HMDA-reportable, small business, and consumer lending in relation to the aggregate and census demographics is provided below.

Overall loan penetration of census tracts of different income levels was good. Five Star made loans in 96.2 percent of the census tracts in 2017, 92.8 percent in 2016, 75.9 percent in 2015, 84.0 percent in 2014 and 65.4 percent in 2013. HMDA lending in 51.5 percent of all census tracts during the evaluation period indicates adequate penetration while small business lending penetration in 11.8 percent of all census tracts indicates some weaknesses. The limited number of branches in the assessment area did contribute to weaker small business penetration in the assessment area.

Home Purchase

Five Star's home purchase lending distribution reflects good penetration throughout the assessment area. The performance is based on adequate penetration in low-income census tracts and good penetration in moderate-income census tracts. In 2017, the bank made 17.0 percent by number and 8.4 percent by dollar volume of home purchase loans in low-income census tracts. The bank's performance exceeded the 7.4 percent of owner-occupied housing units located in low-income census tracts. Five Star also exceeded the aggregate, which made 4.8 percent by number and 2.6 percent by dollar volume in low-income census tracts. The bank's home purchase lending in low-income census tracts in all prior years of the review period was below 2017 lending. Home purchase lending in low-income census tracts in 2013, 2014, and 2015 was below the aggregate, while 2016 was comparable. Further, the bank's performance in all prior years of in the review period was below the demographic.

In 2017, Five Star made 17.0 percent by number and 14.0 percent by dollar volume of its home purchase loans in moderate-income census tracts. The bank's performance exceeded the 11.2 percent of all owner-occupied housing units located in moderate-income census tracts. Five Star's performance also exceeded the aggregate, which made 10.3 percent by number and 6.7 percent by dollar volume of its home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts in 2013, 2014, and 2016 was below 2017 lending, while 2015 lending exceeded. The bank's home purchase lending in moderate-income census tracts in 2013 and 2014 was below both the aggregate and demographic, while 2015 lending exceeded, and 2016 was comparable to both.

Refinance Loans

Five Star's refinance lending distribution reflects adequate penetration throughout the assessment area. The performance is based on good penetration in low-income census tracts and adequate penetration in moderate-income census tracts. In 2017, Five Star made 6.3 percent by number and 3.5 percent by dollar volume of its refinance loans in low-income census tracts. Performance, by number, was comparable to the 7.4 percent of all owner-occupied housing units located in low-income census tracts. The bank's performance exceeded the aggregate, which made 3.3 by number and 1.7 percent by dollar volume of its refinance loans in low-income census tracts. Five Star's refinance lending in low-income census tracts in all prior years of the review period was below the demographic and 2017 lending. Further, the bank's refinance lending in low-income census tracts in 2013, 2014, and 2015 was comparable to the aggregate, while 2016 lending was below.

In 2017, Five Star made 4.2 percent by number and 4.8 percent by dollar volume of its refinance loans in moderate-income census tracts. Performance was below the 11.2 percent of all owner-occupied housing units located in moderate-income census tracts. Five Star's performance in 2017 was also below the aggregate, which made 8.4 percent by number and 5.0 percent by dollar volume of its refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts in 2016 was comparable to 2017 lending, while 2014 and 2015 lending was below, and 2013 was above. Five Star's refinance lending in 2014, 2015 and 2016 was also below the aggregate, while 2013 was comparable. Further, the bank's performance in all prior years in the review period was below the demographic.

Home Improvement

Five Star's home improvement lending distribution reflects adequate penetration throughout the assessment area. The performance is based on poor penetration in low-income census tracts and adequate penetration in moderate-income census tracts. In 2017, Five Star did not make any home improvement loans in low-income census tracts. Performance was below the demographic of the assessment area as 7.4 of all owner-occupied housing are located in low-income census tracts. Performance was also below the aggregate, which made 9.2 percent by number and 4.1 percent by dollar volume of its home improvement loans in low-income census tracts in 2017. The bank's lending in low-income census tracts in 2013 and 2016 was comparable to 2017 lending, while 2014 and 2015 exceeded 2017 performance. Five Star's home improvement lending in low-income census tracts in 2013, 2014, and 2016 was below the aggregate, while 2015 was comparable. Further, the bank's performance in 2013 and 2016 was below the demographic, while 2014 and 2015 was comparable.

In 2017, Five Star did not make any home improvement loans in moderate-income census tract. Performance was below the demographic of the assessment area as 11.2 percent of all owner-occupied housing units are located in moderate-income census tracts. Five Star's performance was below the aggregate, which made 11.8 percent by number and 7.2 percent by dollar volume of its home improvement loans in moderate-income census tracts. The bank's lending in moderate-income census tracts in 2015 was comparable to its 2017 lending, while 2013, 2014, and 2016 exceeded. Five Star's home improvement lending in moderate-income census tracts in all prior years of the review period was below the aggregate and the demographic.

Please refer to Appendix A for the geographic distribution tables of HMDA-reportable loans in the assessment area for 2013 through 2017.

Small Business

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. The conclusion is based on good penetration in low-income geographies and adequate penetration in moderate-income geographies during the review period. In 2017, the bank made 2.8 percent by number and 4.2 percent by dollar volume of its small business loans in low-income census tracts. The bank's performance is below the demographic of the assessment area, as 8.6 percent of total businesses operate in low-income census tracts. The bank's performance was also below the aggregate, which made 9.4 percent by number and 11.3 percent by dollar volume of small business loans in low-income census tracts. The bank's small business lending in low-income census tracts in all prior years of the review period exceeded its 2017 lending. Five Star also exceeded the aggregate performance in 2013, 2014, and 2015, while 2016 was comparable. Further, the bank's small business lending in low-income census tracts in all prior years of the review period was comparable to the demographic.

In 2017, Five Star made 5.6 percent by number and 13.2 percent by dollar volume of its small business loans in moderate-income census tracts. The bank's performance is below the demographic of the assessment area, as 10.5 percent of businesses operate in moderate-income census tracts. The bank's small business lending in 2017 was below the aggregate by number (10.2 percent) but was comparable by dollar volume (11.1 percent). The bank's small business lending in moderate-income census tracts, in 2013 and 2015, was comparable to 2017 lending, while 2014 and 2016 exceeded 2017 performance. Five Star was below the aggregate and demographic in 2013, 2015, and 2016, while performance in 2014 was comparable.

Please refer to Appendix A for the geographic distribution tables of small business loans in the assessment area for 2013 through 2017.

Consumer

The geographic distribution of consumer loans reflects good penetration throughout the assessment area, including low- and moderate-income census tracts. In 2017, Five Star made 9.1 percent of its consumer loans in low-income census tracts by number and 9.7 percent by dollar volume. The bank's performance is below the 13.5 percent of all households living in low-income census tracts. The bank's consumer lending in all prior years of the review period exceeded its 2017 performance, as lending was comparable or slightly below the demographic.

In 2017, Five Star made 14.1 percent by number and 14.7 by dollar volume of its consumer loans in moderate-income census tracts, which is comparable to the 14.0 percent of all households living in moderate-income census tracts. Five Star's consumer lending in moderate-income census tracts in the prior years of the review period was comparable to 2017 performance.

Please refer to Appendix A for the geographic distribution tables of consumer loans in the assessment area for 2013 through 2017.

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

The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and of businesses of different sizes. The bank's performance is based on good HMDA, good small business, and good consumer lending distribution. A detailed discussion of HMDA-reportable, small business, and consumer lending in relation to aggregate and census demographics is provided below. Small farm lending was not evaluated, as the volume was insufficient to obtain meaningful conclusions.

Home Purchase

Five Star's distribution of home purchase loans reflects good penetration among individuals of different income levels. The performance is based on adequate distribution to low-income borrowers and good distribution to moderate-income borrowers.

In 2017, Five Star made 15.3 percent by number and 6.4 percent by dollar volume of its home purchase loans to low-income borrowers, exceeding the aggregate performance of 7.2 percent by number and 3.7 percent by dollar volume; however, the bank's performance was below the demographic of 22.1 percent of the low-income families in the assessment area. The bank's home purchase lending to low-income borrowers in all prior years of the review period was below 2017

lending. During the period of 2013 through 2016, Five Star originated just three home purchase loans (one in 2014 and two in 2015) to low-income borrowers. The bank's home purchase lending to low-income borrowers in 2013 and 2016 was below the aggregate, while 2014 was comparable, and 2015 exceeded. Further, Five Star's lending in all prior years of the review period was below the demographic.

In 2017, Five Star made 19.9 percent by number and 12.5 percent by dollar volume of its home purchase loans to moderate-income borrowers, consistent with the aggregate, which made 20.8 percent by number and 14.6 percent by dollar volume. Home purchase performance to moderate-income borrowers, by number, exceeded the demographic of 16.5 percent of the moderate-income families in the assessment area. In 2014 and 2016, Five Star's home purchase lending to moderate-income borrowers was below 2017 lending, while 2013 and 2015 was consistent. The bank's lending to moderate-income borrowers in 2014, 2015, and 2016 was below the aggregate, while 2013 was comparable. Further, Five Star's lending exceeded the demographic in 2013 and 2015, while 2016 lending was comparable, and 2014 was below.

Refinance

Five Star's distribution of refinance loans reflects adequate penetration among individuals of different income levels. The performance is based on adequate distribution to both low-income borrowers and good distribution to moderate-income borrowers. During the review period, 2013 through 2017, Five Star made three refinance loans to low-income borrowers. As previously discussed, of the total families in the assessment area, 22.1 percent are low-income and nearly of half are below the poverty line, limiting lending opportunities. In 2017, Five did not make any refinance loans to low-income borrowers. The bank's performance was below the aggregate, which made 7.2 percent by number and 3.6 percent by dollar volume of its refinance loans to low-income borrowers. The bank's refinance lending to low-income borrowers in 2014 was consistent with 2017 lending, as the bank did not make any refinance loans to low-income borrowers. The bank's refinance lending to low-income borrowers in 2013, 2015, and 2016 exceeded 2017 performance.

In 2017, Five Star made 12.5 percent by number and 6.3 percent by dollar volume of its refinance loans to moderate-income borrowers. The bank's performance was below the aggregate, which made 17.4 percent by number and 11.3 percent by dollar volume. Five Star's performance was also below the 16.5 percent of moderate-income families in the assessment area. The bank's lending in 2013 and 2014 was comparable to 2017 lending, while 2015 was below, and 2016 exceeded. Further, the bank's refinance lending to moderate-income borrowers in 2013, 2014, and 2015 was below both the aggregate and demographic performance, while 2016 exceeded.

Home Improvement

Five Star's distribution of home improvement loans reflects adequate penetration among individuals of different income levels. Five Star did not make any home improvement loans to low-income borrowers in 2016 and 2017. The bank's performance in 2017 was below the 22.1 percent of low-income families in the assessment area. In 2017, the aggregate made 12.0 percent by number and 4.7 percent by dollar volume of home improvement loans to low-income borrowers. In 2015, the bank's lending was higher, as Five Star made 20.0 percent its home improvement loans by number and 4.4 percent by dollar volume to low-income borrowers. Performance in 2015 was comparable to the demographic and exceeded the aggregate. The bank's lending in 2013 and 2014 was below its 2015 performance.

In 2017, Five Star made 10.5 percent by number and 6.9 percent by dollar volume of its home improvement loans to moderate-income borrowers, below the 16.5 percent of moderate-income families in the assessment area. In 2017, the aggregate made 15.7 percent by number and 7.7 percent by dollar volume of home improvement loans to moderate-income borrowers. The bank's performance in 2013 and 2016 was comparable to 2017's lending. Five Star's best lending performance of the review period was in 2014 when it made 28.6 percent by number and 18.9 percent by dollar volume to moderate-income borrowers. Lending in 2014 exceeded the aggregate of 24.1 percent by number and 15.6 percent by dollar volume and the demographic. Further, in 2015, the bank made 26.7 percent by number and 28.5 percent by dollar volume of its home improvement loans to moderate-income borrowers. The bank's lending in 2015 exceeded the demographic and was comparable to the aggregate.

Please refer to Appendix A for the borrower distribution tables of HMDA-reportable loans in the assessment area for 2013 through 2017.

Small Business

The borrower distribution of small business lending reflects good penetration of businesses of different sizes. In 2017, 86.8 percent of businesses in the assessment area had GAR of \$1 million or less. Five Star's performance was below the demographic, as the bank made 61.1 percent of its business loans by number and 42.7 percent by dollar volume to small businesses. Performance exceeded the aggregate, which made 48.6 percent by number and 29.9 percent by dollar volume. Of the 22 loans originated to small businesses, 63.6 percent were in amounts of \$100,000 or less, which are considered most beneficial to small businesses. Five Star's small business lending in 2015 and 2016 was consistent with 2017 lending, while 2013 and 2014 lending was below. The bank's small business lending exceeded the aggregate in 2014, 2015, and 2016, while 2013 lending

was comparable. However, the bank consistently performed below the demographic in all prior years of the review period.

Please refer to Appendix A for the borrower distribution tables of small business loans in the assessment area for 2013 through 2017.

Consumer

The borrower distribution of consumer lending reflects good penetration among individuals of different income levels. The performance is based on good distribution to low-income borrowers and excellent distribution to moderate-income borrowers. In 2017, Five Star made 17.9 percent by number and 15.0 percent by dollar volume of its consumer loans to low-income borrowers, below the 25.9 percent of low-income households in the assessment area. Five Star’s lending in 2014 through 2016 was consistent with 2017 performance, while 2013 was below.

In 2017, Five Star made 32.9 percent by number and 31.9 percent by dollar volume of its consumer loans to moderate-income borrowers, exceeding the 15.0 percent of moderate-income households in the assessment area. The bank’s lending in 2013 through 2016 was consistent with 2017 performance.

Please refer to Appendix A for the borrower distribution tables of consumer loans in the assessment area for 2013 through 2017.

Community Development Lending

Five Star is a leader in making community development loans. The bank made 16 loans totaling \$72.4 million, or 42.1 percent of the bank’s total community development lending. Peer comparisons with other banking institutions in the assessment area indicate that Five Star compared favorably in terms of annualized community development loans to deposits in the assessment area.

Community Development Loans		
Purpose	#	\$(000s)
Affordable Housing	2	\$12,212
Economic Development	1	\$7,200
Community Services	1	\$3,000
Revitalize and Stabilize	12	\$49,940
Totals	16	\$72,352

Community development lending primarily targeted revitalization and stabilization and affordable housing, as evidenced in dollar amounts. Examples of community development lending included:

- A \$5.0 million construction loan to redevelop a vacant property located in a low-income area in the City of Buffalo into a mixed-use building with 42 apartments with rents meeting affordable housing rates. Construction is in accordance with a master plan from the City of Buffalo to redevelop the area. Projected rents for the apartments are affordable to low- and moderate-income individuals.
- A \$2.1 million construction and permanent loan to a brewery, which will revitalize and stabilize a low-income area in the City of Buffalo. Construction of the brewery will allow expansion of existing operations to a new location in the low-income area. Expansion will create jobs, some of which will go to low- and moderate-income individuals. The brewery will be located in a low-income area that is classified as a brownfield, which will be remediated in the construction process.
- A \$3.2 million loan to purchase and rehabilitate 69 apartment units located in two buildings in a low-income area on the west side of Buffalo. Rents will be affordable to low- and moderate-income individuals.
- A \$2.0 million revolving line of credit to a manufacturer of metal sheets to finance equipment purchases. The equipment will replace manual processes and produce efficiencies that will allow for expansion of the business and help retain jobs for low- and moderate-income workers. The business is in a low-income area of Buffalo.

INVESTMENT TEST

Five Star made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank makes rare use of innovative or complex investments to support community development initiatives, exhibiting adequate responsiveness to credit and community development needs of the assessment area.

Community Development Investments		
Purpose	#	\$(000s)
Affordable Housing	8	\$11,104
Community Services	26	\$190
Economic Development	5	\$30
Revitalize and Stabilize	0	\$0
Totals	39	\$11,324

During the evaluation period, community development investments in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) totaled \$11.3 million, or 13.4 percent of all community development investment activity. A majority of the bank's investments were in mortgage-backed

securities, which are considered less complex than other investment opportunities. Qualified investments during the evaluation period included the following:

- An investment of \$11.1 million in mortgage-backed securities collateralized by the mortgages of low- and moderate-income borrowers to support affordable housing.
- Grants and donations of \$224,000 were made, primarily supporting community service activity.

SERVICE TEST

Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. Five Star's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low- and moderate-income individuals. Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. Further, Five Star provides an adequate level of community services to its assessment area.

Retail Services

Five Star's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. Five Star operates four branches in the assessment area. While no branches are located in low- or moderate-income geographies, one branch is located in an unknown census tract that is adjacent to low- and moderate-income census tracts.

Five Star's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low- and moderate-income individuals. During the evaluation period, Five Star opened one branch in the City of Buffalo in a census tract of unknown-income that is adjacent to six low- or moderate-income census tracts.

Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and low- and moderate-income individuals. All of Five Star's products and services are available at each branch location. The Fountain Plaza branch, which is located in an unknown census tract but adjacent to low- and moderate-income census tracts, does

not have Saturday lobby hours or Saturday drive-in hours. However, the branch is located in a business area where there are limited activities on weekends and insufficient retail traffic to draw clientele on weekends.

Community Development Services

Five Star provides an adequate level of community development services in the assessment area. As presented in the subsequent table, Five Star conducted 8 community service events in the assessment area. The services consisted of a wide variety of events related to the financial education of children and adults, small business technical assistance, and participation with an organization promoting economic development and workforce training. Additionally, Five Star facilitated several first-time homebuyer seminars in low- and moderate-income areas.

Summary of Community Development Services MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) Assessment Area October 1, 2013 – September 30, 2018	
Activity Type	Current Evaluation Total
Residential Mortgage/First-time Homebuyers Seminars	8
TOTAL ACTIVITY	8

Bank officers and senior staff also served on the boards and committees of 11 community development organizations that provided on-going financial and management expertise to organizations focused on low- and moderate-income youth, children in foster care, support for homeless individuals and supportive housing for at-risk and disabled individuals. Examples of services include:

- A bank officer served on the Board of Directors of an organization focused on workforce development.
- A bank officer served on the Board of Directors of an organization providing credit counseling services to low- and moderate-income individuals and families.
- A bank officer facilitated first-time homebuyer seminars in low- and moderate-income areas.

**ELMIRA, NY ASSESSMENT AREA
(LIMITED REVIEW)**

MSA 21300 (Elmira, NY)

DESCRIPTION OF INSTITUTION’S OPERATIONS

A limited evaluation of Five Star’s performance in MSA 21300 (Elmira, NY) was conducted. The assessment area consists Chemung County. Five Star maintains three branches in the assessment area, two of which are located in low- and moderate-income census tracts. Since the previous evaluation, Five Star did not open or close any branches in the assessment area.

As of June 30, 2018, 5.1 percent of Five Star’s total deposits were the assessment area. Five Star ranks third out of seven banks in the assessment area with 15.9 percent of all deposits. Further, during the evaluation period 2.1 percent of the bank’s total HMDA, small business, small farm, and consumer lending activity was made in the assessment area. The bank’s operations in this assessment area are consistent with overall operations.

The assessment area consists of 22 census tracts: four low-, three moderate-, 11 middle-, three upper, and one unknown-income census tract. The assessment area contains 3.4 percent of the combined assessment area’s population. Key demographic information is listed below:

Assessment Area Demographics – MSA 21300 (Elmira, 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	4	18.2	4.7	22.9
Moderate Income	3	13.6	8.5	16.0
Middle Income	11	50.0	56.3	21.0
Upper Income	3	13.6	30.6	40.0
Unknown	1	4.5	0.0	0.0
Total	22	100.0	100.0	100.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 21300

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Five Star’s performance in MSA 21300 was consistent with the bank’s overall performance under the lending, investment and service tests, which was based on the full-scope assessment area performance. The results are summarized in the table below.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 21300	Consistent	Consistent	Consistent

Five Star’s lending performance was consistent, as the bank made 220 HMDA loans, 70 small business and 186 consumer loans in the assessment area. Both geographic distribution and borrower distribution reflected good penetration. Further, community development lending was consistent with the bank’s overall performance, as \$10.1 million loans were made in the assessment area.

Investment performance was consistent with its overall performance as the bank made \$4.4 million in investments and grants in the assessment area.

Service test performance was consistent as the bank operates three branches in the assessment area. One branch is located in a low-income census tract and one is located in a moderate-income census tract, ensuring low- and moderate-income individuals have access to banking services in the assessment area.

CRA Appendix A

LENDING TABLES

2017 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: New York State Nonmetropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.5%	0.2%	8	6.7%	4.0%	7.6%	3.7%
Moderate	7	5.8%	4.0%	6.2%	3.5%	50	41.7%	36.3%	21.8%	14.5%
Middle	112	93.3%	94.8%	82.1%	82.9%	24	20.0%	19.5%	23.3%	18.6%
Upper	1	0.8%	1.2%	11.2%	13.4%	33	27.5%	36.5%	31.0%	39.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	4.2%	3.6%	16.4%	23.7%
<i>Total</i>	<i>120</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>120</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	0.3%	0.1%	16	10.6%	6.9%	7.5%	4.3%
Moderate	5	3.3%	2.1%	5.0%	3.0%	38	25.2%	21.6%	18.0%	12.6%
Middle	142	94.0%	94.9%	83.1%	83.9%	41	27.2%	26.5%	26.8%	22.7%
Upper	4	2.6%	3.0%	11.5%	12.9%	53	35.1%	42.0%	37.2%	47.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.0%	3.1%	10.6%	12.9%
<i>Total</i>	<i>151</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>151</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.2%	36	20.8%	7.8%	14.4%	6.5%
Moderate	13	7.5%	3.5%	6.4%	4.5%	46	26.6%	21.2%	23.0%	15.9%
Middle	154	89.0%	88.8%	84.0%	82.0%	42	24.3%	19.4%	28.0%	24.8%
Upper	6	3.5%	7.7%	9.4%	13.4%	45	26.0%	48.1%	31.9%	49.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	2.3%	3.4%	2.7%	3.3%
<i>Total</i>	<i>173</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>173</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	19.2%	5.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	7.7%	25.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	57.7%	51.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	15.4%	17.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	0.4%	0.5%	60	13.5%	6.0%	9.2%	3.8%
Moderate	25	5.6%	3.0%	6.0%	4.9%	134	30.1%	26.8%	21.2%	13.2%
Middle	408	91.7%	93.4%	82.8%	81.0%	107	24.0%	22.4%	25.2%	18.7%
Upper	12	2.7%	3.6%	10.9%	13.5%	131	29.4%	41.1%	32.5%	39.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	2.9%	3.6%	11.9%	25.0%
<i>Total</i>	<i>445</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>445</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	1	0.9%	4.2%	3.3%	3.8%
Moderate	7	6.0%	5.3%	8.4%	9.3%
Middle	102	87.2%	85.2%	77.4%	75.4%
Upper	7	6.0%	5.4%	9.7%	11.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.4%
<i>Total</i>	<i>117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	81	69.2%	44.5%	51.1%	38.2%
	By Loan Size				
\$100,000 or less	94	80.3%	29.2%	91.2%	34.3%
\$100,001-\$250,000	13	11.1%	19.8%	5.1%	20.3%
\$250,001-\$1 Million	10	8.5%	51.0%	3.7%	45.4%
<i>Total</i>	<i>117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: Non Metropolitan AA

	SMALL FARM				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	1	6.0%	9.2%	0.4%	0.4%
Moderate	0	0.0%	0.0%	0.6%	0.4%
Middle	13	81.3%	83.0%	86.9%	88.2%
Upper	2	12.5%	7.8%	12.0%	10.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.1%	0.0%
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$500,000 or Less	7	43.8%	11.3%	57.3%	64.4%
	By Loan Size				
\$100,000 or less	9	56.3%	8.5%	82.3%	34.7%
\$100,001-\$250,000	3	18.8%	27.6%	11.3%	29.6%
\$250,001-\$1 Million	4	25.07%	63.9%	6.4%	35.7%
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2017 Consumer Loan Distribution Table

Assessment Area: New York State Nonmetropolitan Area

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	8	0.8%	195	0.8%	125	12.8%	2,266	9.6%
Moderate	67	6.8%	1,661	7.0%	289	29.5%	6,478	27.4%
Middle	831	84.9%	20,178	85.3%	323	33.0%	8,259	34.9%
Upper	73	7.5%	1,615	6.8%	242	24.7%	6,646	28.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	979	100.0%	23,649	100.0%	979	100.0%	23,649	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: New York State Nonmetropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.3%	0.2%	12	10.6%	7.1%	5.8%	3.2%
Moderate	6	5.3%	2.2%	5.2%	3.2%	29	25.7%	16.3%	22.2%	15.6%
Middle	104	92.0%	93.6%	81.8%	80.4%	28	24.8%	23.2%	24.8%	22.1%
Upper	3	2.7%	4.3%	12.7%	16.2%	40	35.4%	47.4%	32.4%	45.7%
Unknown	0	0.0%	0.0%	0.0%	0.1%	4	3.5%	5.9%	14.7%	13.3%
<i>Total</i>	<i>113</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>113</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.0%	20	9.0%	5.6%	6.6%	3.3%
Moderate	4	1.8%	1.1%	3.4%	2.4%	49	22.1%	15.9%	16.5%	11.7%
Middle	182	82.0%	79.4%	80.2%	77.9%	64	28.8%	25.7%	23.6%	19.7%
Upper	36	16.2%	19.5%	16.3%	19.7%	77	34.7%	48.0%	41.8%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	5.4%	4.9%	11.5%	12.9%
<i>Total</i>	<i>222</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>222</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	0.3%	0.1%	29	12.1%	4.2%	13.8%	6.1%
Moderate	12	5.0%	1.9%	5.2%	3.3%	57	23.8%	19.0%	24.2%	15.8%
Middle	202	84.5%	84.1%	84.4%	85.5%	72	30.1%	25.7%	26.3%	22.3%
Upper	25	10.5%	13.9%	10.2%	11.1%	76	31.8%	48.8%	33.2%	51.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	2.1%	2.3%	2.5%	4.3%
<i>Total</i>	<i>239</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>239</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	5.3%	1.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	5.3%	0.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	78.9%	94.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.5%	4.1%	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%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	0.2%	0.1%	61	10.6%	5.6%	7.9%	3.4%
Moderate	22	3.8%	1.6%	4.8%	2.9%	135	23.5%	16.6%	21.3%	14.4%
Middle	489	85.0%	84.4%	82.0%	80.3%	164	28.5%	24.8%	24.8%	21.2%
Upper	64	11.1%	14.0%	13.0%	16.6%	193	33.6%	47.6%	34.8%	47.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	3.8%	5.3%	11.2%	13.6%
<i>Total</i>	<i>575</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>575</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	0	0.0%	0.0%	2.4%	3.1%
Moderate	6	3.7%	5.6%	7.3%	9.1%
Middle	138	85.2%	83.9%	78.6%	76.0%
Upper	18	11.1%	10.5%	10.4%	11.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.5%
<i>Total</i>	<i>162</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
\$1 Million or Less	130	80.2%	54.3%	50.7%	35.7%
\$100,000 or less	128	79.0%	25.7%	90.3%	31.6%
\$100,001-\$250,000	17	10.5%	17.7%	5.7%	21.1%
\$250,001-\$1 Million	17	10.5%	56.6%	4.0%	47.3%
<i>Total</i>	<i>162</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: Non Metropolitan AA

	SMALL FARM				
	By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.1%	0.2%
Middle	10	83.3%	97.8%	88.7%	89.4%
Upper	2	16.7%	2.2%	11.1%	10.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.1%	0.0%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
\$500,000 or Less	7	58.3%	40.4%	63.5%	61.9%
\$100,000 or less	7	58.3%	15.6%	81.1%	36.5%
\$100,001-\$250,000	3	25.0%	37.1%	12.3%	29.4%
\$250,001-\$1 Million	2	16.7%	47.3%	6.6%	34.1%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2016 Consumer Loan Distribution Table

Assessment Area: New York State Nonmetropolitan Area

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	6	0.8%	143	0.8%	72	9.8%	1,304	7.2%
Moderate	51	6.9%	1,510	8.3%	223	30.4%	5,059	27.7%
Middle	607	82.7%	14,867	81.6%	218	29.7%	5,680	31.2%
Upper	70	9.5%	1,709	9.4%	221	30.1%	6,187	33.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	734	100.0%	18,230	100.0%	734	100.0%	18,230	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: New York State Nonmetropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.4%	0.2%	11	7.6%	4.6%	6.9%	3.7%
Moderate	9	6.3%	3.7%	5.5%	3.4%	35	24.3%	16.9%	23.3%	16.8%
Middle	115	79.9%	83.2%	80.6%	79.6%	38	26.4%	25.8%	23.4%	21.4%
Upper	20	13.9%	13.1%	13.5%	16.7%	58	40.3%	51.9%	31.0%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.4%	0.9%	15.3%	14.3%
<i>Total</i>	<i>144</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>144</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	0.4%	0.2%	14	6.2%	3.6%	6.1%	3.0%
Moderate	8	3.5%	2.9%	3.8%	2.8%	57	25.2%	21.6%	17.5%	12.3%
Middle	182	80.5%	80.4%	79.5%	77.9%	69	30.5%	28.3%	26.2%	22.0%
Upper	35	15.5%	15.8%	16.3%	19.0%	78	34.5%	42.7%	39.7%	50.0%
Unknown	1	0.4%	0.8%	0.0%	0.1%	8	3.5%	3.8%	10.5%	12.6%
<i>Total</i>	<i>226</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>226</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	0.3%	0.1%	17	8.2%	3.0%	13.9%	6.9%
Moderate	10	4.8%	2.3%	4.0%	2.6%	55	26.4%	18.1%	25.4%	16.3%
Middle	174	83.7%	83.7%	85.4%	84.4%	64	30.8%	28.8%	26.5%	23.6%
Upper	24	11.5%	14.0%	10.3%	12.9%	67	32.2%	46.7%	31.8%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	2.4%	3.3%	2.4%	3.5%
<i>Total</i>	<i>208</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>208</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	3.0%	0.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	6.1%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	100.0%	100.0%	87.9%	48.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	3.0%	42.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
<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>
HMDA Totals										
Low	0	0.0%	0.0%	0.4%	0.2%	42	7.2%	3.6%	8.5%	3.5%
Moderate	27	4.6%	2.9%	4.7%	3.5%	147	25.3%	18.6%	22.3%	14.6%
Middle	474	81.6%	82.7%	81.6%	77.9%	171	29.4%	26.6%	24.8%	20.6%
Upper	79	13.6%	14.0%	13.3%	18.4%	203	34.9%	45.0%	33.3%	43.7%
Unknown	1	0.2%	0.4%	0.0%	0.0%	18	3.1%	6.1%	11.0%	17.5%
<i>Total</i>	<i>581</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>581</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	3	1.7%	2.4%	2.4%	3.4%
Moderate	11	6.3%	8.9%	7.8%	12.8%
Middle	143	81.3%	79.4%	76.4%	72.5%
Upper	19	10.8%	9.4%	11.0%	10.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.4%	0.6%
<i>Total</i>	<i>176</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	142	80.7%	46.4%	47.6%	36.3%
	By Loan Size				
\$100,000 or less	132	75.0%	21.0%	90.3%	31.7%
\$100,001-\$250,000	21	11.9%	17.8%	5.5%	20.0%
\$250,001-\$1 Million	23	13.1%	61.3%	4.3%	48.3%
<i>Total</i>	<i>176</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: Non Metropolitan AA

	SMALL FARM				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.3%	0.2%
Middle	17	77.3%	69.2%	87.8%	87.2%
Upper	5	22.7%	30.8%	11.6%	12.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.2%	0.0%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$500,000 or Less	13	59.1%	40.7%	66.0%	62.6%
	By Loan Size				
\$100,000 or less	11	50.0%	14.6%	78.5%	34.6%
\$100,001-\$250,000	10	45.5%	67.1%	15.4%	35.7%
\$250,001-\$1 Million	1	4.5%	18.3%	6.1%	29.6%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Consumer Loan Distribution Table

Assessment Area: New York State Nonmetropolitan Area

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	6	1.0%	149	1.1%	64	11.2%	1,109	8.0%
Moderate	40	7.0%	1,017	7.4%	179	31.2%	4,166	30.2%
Middle	469	81.8%	11,242	81.4%	176	30.7%	4,387	31.8%
Upper	58	10.1%	1,397	10.1%	152	26.5%	4,119	29.8%
Unknown	0	0.0%	0	0.0%	2	0.3%	23	0.2%
Total	573	100.0%	13,805	100.0%	573	100.0%	13,805	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: New York State Nonmetropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.5%	0.3%	5	4.4%	2.6%	6.3%	3.4%
Moderate	5	4.4%	2.4%	6.1%	4.1%	26	22.8%	17.1%	21.3%	15.3%
Middle	97	85.1%	85.0%	80.7%	78.6%	34	29.8%	30.3%	24.3%	22.6%
Upper	12	10.5%	12.6%	12.7%	17.0%	44	38.6%	44.1%	33.0%	45.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	4.4%	5.9%	15.1%	13.0%
<i>Total</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	0.3%	0.4%	21	7.3%	4.6%	7.3%	4.2%
Moderate	9	3.1%	1.9%	4.1%	2.8%	54	18.8%	14.2%	17.1%	11.9%
Middle	253	87.8%	86.4%	81.9%	79.6%	84	29.2%	27.1%	25.5%	21.5%
Upper	26	9.0%	11.7%	13.7%	17.2%	113	39.2%	48.7%	39.7%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	5.6%	5.5%	10.3%	12.6%
<i>Total</i>	<i>288</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>288</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	0.3%	0.4%	37	13.9%	7.2%	13.9%	7.4%
Moderate	13	4.9%	2.3%	4.3%	3.3%	70	26.3%	15.9%	23.5%	16.1%
Middle	230	86.5%	88.2%	85.2%	85.3%	62	23.3%	24.8%	26.9%	23.4%
Upper	23	8.6%	9.5%	10.3%	11.0%	90	33.8%	48.5%	32.5%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	2.6%	3.6%	3.3%	5.6%
<i>Total</i>	<i>266</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>266</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	10.5%	2.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	78.9%	97.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.5%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	0.4%	0.3%	63	9.4%	4.8%	8.5%	3.8%
Moderate	27	4.0%	2.1%	5.1%	3.6%	150	22.5%	15.2%	20.7%	13.9%
Middle	580	86.8%	86.5%	82.2%	80.0%	180	26.9%	27.2%	25.2%	21.6%
Upper	61	9.1%	11.3%	12.4%	16.1%	247	37.0%	47.6%	34.6%	45.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	28	4.2%	5.1%	11.0%	15.2%
<i>Total</i>	<i>668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	2	1.4%	0.4%	2.6%	3.9%
Moderate	14	9.5%	29.2%	7.8%	11.2%
Middle	116	78.4%	48.7%	76.1%	73.5%
Upper	16	10.8%	21.7%	10.8%	10.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.7%	0.7%
<i>Total</i>	<i>148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	109	73.6%	37.2%	41.1%	35.6%
	By Loan Size				
\$100,000 or less	126	85.1%	36.7%	90.5%	32.2%
\$100,001-\$250,000	15	10.1%	24.5%	5.8%	22.5%
\$250,001-\$1 Million	7	4.7%	38.8%	3.7%	45.3%
<i>Total</i>	<i>148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: Non Metropolitan AA

	SMALL FARM				
	By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.2%	0.2%
Middle	17	77.3%	69.2%	88.2%	89.8%
Upper	5	22.7%	30.8%	11.3%	10.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.3%	0.0%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$500,000 or Less	13	59.1%	40.7%	68.0%	61.9%
	By Loan Size				
\$100,000 or less	11	50.0%	14.6%	78.9%	34.5%
\$100,001-\$250,000	10	45.5%	67.1%	15.1%	34.9%
\$250,001-\$1 Million	1	4.5%	18.3%	6.1%	30.6%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2014 Consumer Loan Distribution Table

Assessment Area: New York State Nonmetropolitan Area

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	3	0.9%	53	0.6%	40	11.9%	793	9.5%
Moderate	23	6.9%	596	7.2%	115	34.3%	2,681	32.2%
Middle	271	80.9%	6,815	81.8%	92	27.5%	2,289	27.5%
Upper	38	11.3%	869	10.4%	88	26.3%	2,572	30.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	335	100.0%	8,334	100.0%	335	100.0%	8,334	100.0%

Originations and Purchases

2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: New York State Nonmetropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank		Aggregate		#	Bank		Aggregate	
%		% \$(000s)	%	% \$(000s)	%		% \$(000s)	%	% \$(000s)	
	Home Purchase									
Low	0	0.0%	0.0%	0.7%	0.4%	6	5.0%	2.9%	5.9%	3.2%
Moderate	10	8.3%	3.9%	4.7%	3.0%	36	29.8%	22.5%	24.0%	17.4%
Middle	97	80.2%	81.2%	79.0%	77.2%	33	27.3%	24.2%	23.3%	20.9%
Upper	14	11.6%	15.0%	15.6%	19.3%	39	32.2%	44.2%	34.3%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	5.8%	6.3%	12.4%	10.6%
<i>Total</i>	<i>121</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>121</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	0.3%	0.1%	26	5.8%	3.6%	5.8%	2.5%
Moderate	23	5.1%	3.8%	3.0%	1.5%	98	21.7%	15.4%	16.2%	8.7%
Middle	379	84.0%	82.5%	79.1%	81.2%	126	27.9%	24.7%	25.5%	17.5%
Upper	49	10.9%	13.7%	17.5%	17.1%	185	41.0%	52.4%	43.9%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	3.5%	3.9%	8.6%	26.4%
<i>Total</i>	<i>451</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>451</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.1%	30	11.0%	4.3%	11.0%	4.9%
Moderate	11	4.0%	2.5%	2.8%	1.9%	63	23.2%	16.4%	23.2%	14.7%
Middle	231	84.9%	85.2%	83.8%	82.2%	88	32.4%	31.2%	28.2%	24.1%
Upper	30	11.0%	12.3%	13.3%	15.8%	86	31.6%	44.7%	34.9%	51.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	1.8%	3.4%	2.8%	4.4%
<i>Total</i>	<i>272</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>272</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	4.8%	0.2%	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	100.0%	100.0%	76.2%	66.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	19.0%	33.1%	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%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	0.4%	0.2%	62	7.3%	3.6%	6.9%	2.9%
Moderate	44	5.2%	3.5%	3.7%	2.2%	197	23.3%	16.9%	20.9%	12.8%
Middle	708	83.8%	82.8%	80.0%	79.1%	247	29.2%	25.9%	25.1%	18.9%
Upper	93	11.0%	13.7%	15.8%	18.5%	310	36.7%	49.3%	37.9%	45.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	3.4%	4.4%	9.1%	20.0%
<i>Total</i>	<i>845</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>845</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS By Tract Income				
	#	Bank	Aggregate		
		%	% \$(000s)	%	% \$(000s)
Low	4	2.2%	2.0%	2.0%	2.5%
Moderate	10	5.4%	9.2%	7.0%	6.5%
Middle	149	80.1%	84.8%	76.2%	79.4%
Upper	23	12.4%	4.0%	12.0%	10.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.7%	0.7%
<i>Total</i>	<i>186</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
			By Revenue		
\$1 Million or Less	141	75.8%	29.6%	48.1%	38.0%
			By Loan Size		
\$100,000 or less	143	76.9%	20.8%	89.5%	31.6%
\$100,001-\$250,000	20	10.8%	13.7%	5.8%	19.4%
\$250,001-\$1 Million	23	12.4%	65.6%	4.7%	49.0%
<i>Total</i>	<i>186</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

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

	SMALL FARM By Tract Income				
	#	Bank	Aggregate		
		%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.1%	0.0%
Moderate	0	0.0%	0.0%	0.5%	0.3%
Middle	15	83.3%	67.5%	86.0%	87.8%
Upper	3	16.7%	32.5%	13.4%	11.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
			By Revenue		
\$500,000 or Less	13	72.2%	38.7%	77.1%	74.3%
			By Loan Size		
\$100,000 or less	14	77.8%	38.7%	83.0%	41.2%
\$100,001-\$250,000	2	11.1%	20.4%	12.3%	32.1%
\$250,001-\$1 Million	2	11.1%	45.9%	4.7%	26.6%
<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2013 Consumer Loan Distribution Table

Assessment Area: New York State Nonmetropolitan Area

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	14	10.0%	241	7.0%
Moderate	9	6.4%	260	7.5%	36	25.7%	832	24.0%
Middle	116	82.9%	2,780	80.4%	47	33.6%	1,217	35.2%
Upper	15	10.7%	419	12.1%	43	30.7%	1,170	33.8%
Unknown	0	0.0%	0	0.0%	29	3.4%	2,457	4.4%
Total	140	100.0%	3,459	100.0%	140	100.0%	3,459	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 40380

Income Categories	HMDA
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	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	16	10.1%	5.3%	2.4%	1.4%	38	24.1%	13.7%	7.5%	4.1%
Moderate	39	24.7%	16.6%	11.6%	7.3%	46	29.1%	21.1%	20.7%	15.1%
Middle	81	51.3%	50.8%	51.7%	46.1%	21	13.3%	11.9%	22.0%	20.6%
Upper	22	13.9%	27.3%	34.3%	45.1%	44	27.8%	45.7%	32.9%	45.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	5.7%	7.6%	16.9%	14.8%
<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>158</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	2.4%	1.5%	8	5.8%	2.4%	7.5%	4.2%
Moderate	15	10.9%	7.6%	10.1%	6.6%	30	21.9%	15.2%	17.6%	12.6%
Middle	94	68.6%	59.8%	54.2%	49.0%	33	24.1%	19.4%	23.5%	20.4%
Upper	28	20.4%	32.5%	33.2%	42.8%	58	42.3%	53.0%	39.0%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	5.8%	10.0%	12.3%	12.5%
<i>Total</i>	<i>137</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>137</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	2.7%	1.1%	17	14.3%	4.6%	10.2%	4.4%
Moderate	14	11.8%	9.1%	14.9%	10.7%	35	29.4%	19.0%	22.8%	13.0%
Middle	88	73.9%	67.5%	55.3%	52.1%	26	21.8%	24.2%	27.3%	22.5%
Upper	17	14.3%	23.4%	27.1%	36.1%	40	33.6%	50.1%	37.5%	51.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.8%	2.0%	2.1%	8.7%
<i>Total</i>	<i>119</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>119</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	2	50.0%	14.9%	17.5%	14.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	25.0%	8.8%	25.0%	8.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	25.0%	76.3%	39.2%	44.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	18.3%	32.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	18	4.3%	4.6%	2.5%	3.1%	63	15.1%	7.0%	7.8%	3.6%
Moderate	69	16.5%	11.7%	11.8%	7.5%	111	26.6%	15.6%	20.2%	12.6%
Middle	264	63.2%	59.4%	52.7%	46.6%	80	19.1%	13.7%	22.9%	18.0%
Upper	67	16.0%	24.3%	33.0%	42.8%	142	34.0%	41.3%	34.8%	40.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	5.3%	22.4%	14.3%	24.9%
<i>Total</i>	<i>418</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>418</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

SMALL BUSINESS	
By Tract Income	
Bank	Aggregate

	#	%	% \$(000s)	%	% \$(000s)
Low	8	5.4%	7.6%	7.9%	9.8%
Moderate	20	13.4%	11.4%	11.2%	13.0%
Middle	81	54.4%	43.5%	45.4%	43.3%
Upper	40	26.8%	37.5%	34.5%	33.4%
Unknown	0	0.0%	0.0%	0.1%	0.2%
Tract Unknown	0	0.0%	0.0%	0.9%	0.4%
Total	149	100.0%	100.0%	100.0%	100.0%
	By Revenue				
\$1 Million or Less	92	61.7%	31.6%	48.8%	31.5%
	By Loan Size				
\$100,000 or less	99	66.4%	17.3%	91.8%	31.3%
\$100,001-\$250,000	23	15.4%	17.2%	3.9%	15.2%
\$250,001-\$1 Million	27	18.1%	65.5%	4.3%	53.4%
Total	149	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 40380

	SMALL FARM By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	0	0.0%	0.0%	0.2%	0.0%
Moderate	1	14.3%	3.8%	8.1%	10.5%
Middle	5	71.4%	67.4%	84.6%	85.3%
Upper	1	14.3%	28.9%	6.8%	4.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.3%	0.0%
Total	7	100.0%	100.0%	100.0%	100.0%
	By Revenue				
\$500,000 or Less	6	85.7%	80.5%	12.3%	66.4%
	By Loan Size				
\$100,000 or less	4	57.1%	9.7%	81.2%	31.3%
\$100,001-\$250,000	2	28.6%	48.3%	12.7%	32.9%
\$250,001-\$1 Million	1	14.3%	42.0%	6.2%	35.8%
Total	7	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

2017 Consumer Loan Distribution Table

Assessment Area: MSA 40380

Income Categories	Consumer Loan Totals
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	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	112	5.0%	2,646	5.2%	365	16.4%	6,660	13.1%
Moderate	313	14.1%	7,266	14.3%	683	30.7%	14,951	29.4%
Middle	1,305	58.6%	29,724	58.4%	619	27.8%	14,567	28.6%
Upper	497	22.3%	11,283	22.2%	560	25.1%	14,741	29.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,227	100.0%	50,919	100.0%	2,227	100.0%	50,919	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 40380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	7	4.7%	2.4%	2.1%	1.5%	27	18.2%	9.2%	8.5%	4.5%
Moderate	27	18.2%	12.2%	8.7%	5.4%	34	23.0%	13.6%	21.9%	15.7%
Middle	93	62.8%	57.9%	57.6%	50.9%	17	11.5%	8.2%	22.3%	20.5%
Upper	21	14.2%	27.4%	31.6%	42.2%	61	41.2%	60.0%	33.1%	46.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	6.1%	9.0%	14.3%	13.2%
<i>Total</i>	<i>148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>148</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	2	0.8%	1.8%	1.7%	1.1%	28	10.5%	4.7%	6.2%	3.3%
Moderate	19	7.1%	8.5%	7.9%	4.8%	44	16.5%	12.4%	16.6%	11.3%
Middle	196	73.7%	67.9%	54.5%	48.4%	78	29.3%	26.9%	23.3%	19.4%
Upper	49	18.4%	21.8%	35.9%	45.7%	103	38.7%	47.7%	38.9%	51.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	4.9%	8.3%	15.0%	14.6%
<i>Total</i>	<i>266</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>266</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	2.3%	0.8%	28	16.5%	6.6%	11.5%	5.4%
Moderate	18	10.6%	6.6%	12.2%	6.9%	39	22.9%	16.1%	23.5%	13.3%
Middle	135	79.4%	81.7%	63.0%	57.8%	46	27.1%	21.9%	27.9%	19.8%
Upper	17	10.0%	11.7%	22.5%	34.5%	51	30.0%	48.7%	34.8%	54.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	3.5%	6.6%	2.3%	7.1%
<i>Total</i>	<i>170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>170</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	20.4%	17.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.4%	10.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	42.9%	56.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	18.4%	15.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	9	1.5%	1.7%	2.1%	2.6%	83	14.2%	6.5%	8.2%	3.9%
Moderate	64	10.9%	9.3%	9.0%	5.6%	117	20.0%	13.4%	20.6%	13.4%
Middle	424	72.5%	66.8%	57.4%	50.9%	141	24.1%	19.7%	23.1%	18.6%
Upper	88	15.0%	22.2%	31.5%	40.8%	215	36.8%	51.8%	34.7%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	5.0%	8.6%	13.4%	20.0%
<i>Total</i>	<i>585</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>585</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	7	3.3%	6.2%	7.7%	10.6%
Moderate	19	8.9%	9.8%	8.8%	9.0%
Middle	123	57.5%	45.0%	50.3%	46.2%
Upper	65	30.4%	39.1%	32.2%	33.7%
Unknown	0	0.0%	0.0%	0.1%	0.3%
Tract Unknown	0	0.0%	0.0%	0.9%	0.3%
<i>Total</i>	<i>214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	145	67.8%	47.5%	44.2%	31.7%
	By Loan Size				
\$100,000 or less	135	63.1%	17.7%	91.4%	29.0%
\$100,001-\$250,000	42	19.6%	23.3%	4.1%	15.6%
\$250,001-\$1 Million	37	17.3%	59.1%	4.5%	55.4%
<i>Total</i>	<i>214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 40380

	SMALL FARM				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	9.5%	8.0%
Middle	13	92.9%	97.4%	83.8%	86.7%
Upper	1	7.1%	2.6%	6.4%	5.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.3%	0.0%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$500,000 or Less	10	71.4%	36.0%	61.0%	64.3%
	By Loan Size				
\$100,000 or less	10	71.4%	21.0%	81.4%	38.2%
\$100,001-\$250,000	3	21.4%	42.9%	14.2%	16.9%
\$250,001-\$1 Million	1	7.1%	31.1%	4.4%	24.9%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2016 Consumer Loan Distribution Table

Assessment Area: MSA 40380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	107	4.7%	2,502	4.7%	362	15.9%	7,065	13.2%
Moderate	253	11.1%	6,146	11.4%	710	31.3%	16,065	29.9%
Middle	1,381	60.8%	32,394	60.3%	615	27.1%	14,892	27.7%
Upper	529	23.3%	12,656	23.6%	583	25.7%	15,676	29.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,270	100.0%	53,698	100.0%	2,270	100.0%	53,698	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 40380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	1	0.8%	0.4%	1.9%	1.0%	20	16.8%	9.2%	9.0%	4.9%
Moderate	14	11.8%	7.1%	8.6%	5.1%	27	22.7%	15.3%	23.6%	17.4%
Middle	81	68.1%	61.6%	57.5%	51.7%	26	21.8%	19.5%	22.0%	21.0%
Upper	23	19.3%	30.9%	32.0%	42.2%	37	31.1%	49.5%	29.3%	41.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	7.6%	6.5%	16.1%	15.3%
<i>Total</i>	<i>119</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>119</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	2	1.0%	0.3%	2.5%	1.7%	13	6.3%	3.1%	7.1%	3.8%
Moderate	21	10.1%	6.7%	7.6%	4.5%	46	22.1%	16.3%	19.0%	13.6%
Middle	152	73.1%	69.1%	55.5%	49.5%	61	29.3%	25.8%	22.6%	19.1%
Upper	33	15.9%	23.9%	34.4%	44.3%	82	39.4%	49.7%	37.5%	49.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	2.9%	5.1%	13.8%	14.5%
<i>Total</i>	<i>208</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>208</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	4	2.5%	1.0%	2.8%	1.1%	30	18.4%	7.9%	13.1%	5.5%
Moderate	13	8.0%	3.8%	12.3%	7.0%	44	27.0%	15.7%	25.8%	16.5%
Middle	131	80.4%	82.0%	62.9%	59.7%	43	26.4%	29.6%	25.8%	22.0%
Upper	15	9.2%	13.3%	21.9%	32.2%	40	24.5%	41.9%	32.3%	49.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	3.7%	4.8%	3.0%	6.5%
<i>Total</i>	<i>163</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>163</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	1	50.0%	83.7%	17.5%	13.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.6%	8.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	16.3%	42.9%	45.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	19.0%	33.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	8	1.6%	2.3%	2.3%	2.3%	63	12.8%	5.7%	9.1%	4.2%
Moderate	48	9.8%	6.2%	8.9%	5.3%	117	23.8%	15.5%	22.6%	14.9%
Middle	365	74.2%	67.7%	57.6%	50.8%	130	26.4%	23.9%	22.6%	18.7%
Upper	71	14.4%	23.8%	31.2%	41.6%	159	32.3%	47.2%	31.6%	39.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	4.7%	7.6%	14.2%	22.6%
<i>Total</i>	<i>492</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>492</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	14	6.2%	11.7%	8.1%	12.0%
Moderate	18	7.9%	9.3%	9.0%	7.8%
Middle	140	61.7%	38.7%	49.5%	46.9%
Upper	55	24.2%	40.3%	31.8%	32.5%
Unknown	0	0.0%	0.0%	0.1%	0.3%
Tract Unknown	0	0.0%	0.0%	1.3%	0.4%
<i>Total</i>	<i>227</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
			By Revenue		
\$1 Million or Less	158	69.6%	45.2%	43.1%	30.5%
			By Loan Size		
\$100,000 or less	146	64.3%	16.7%	91.0%	27.6%
\$100,001-\$250,000	40	17.6%	22.6%	4.1%	15.1%
\$250,001-\$1 Million	41	18.1%	60.6%	4.9%	57.3%
<i>Total</i>	<i>227</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 40380

	SMALL FARM				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.1%	0.1%
Moderate	0	0.0%	0.0%	10.3%	6.7%
Middle	8	100.0%	100.0%	82.8%	86.8%
Upper	0	0.0%	0.0%	6.9%	6.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.1%	0.0%
<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
			By Revenue		
\$500,000 or Less	5	62.5%	22.1%	59.5%	60.9%
			By Loan Size		
\$100,000 or less	5	62.5%	22.1%	79.1%	35.0%
\$100,001-\$250,000	1	12.5%	20.1%	15.7%	37.0%
\$250,001-\$1 Million	2	25.0%	57.8%	5.2%	28.0%
<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Consumer Loan Distribution Table

Assessment Area: MSA 40380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	64	3.6%	1,535	3.7%	349	19.7%	6,838	16.4%
Moderate	198	11.1%	4,640	11.1%	564	31.8%	12,743	30.5%
Middle	1,053	59.3%	24,809	59.4%	458	25.8%	10,967	26.2%
Upper	461	26.0%	10,805	25.9%	404	22.7%	11,213	26.8%
Unknown	0	0.0%	0	0.0%	1	0.1%	28	0.1%
Total	1,776	100.0%	41,789	100.0%	1,776	100.0%	41,789	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 40380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	1	1.0%	0.3%	1.9%	1.1%	7	7.0%	3.6%	8.2%	4.4%
Moderate	8	8.0%	4.8%	9.5%	5.6%	19	19.0%	10.9%	22.9%	16.7%
Middle	67	67.0%	56.2%	56.1%	49.7%	31	31.0%	24.8%	20.5%	19.1%
Upper	24	24.0%	38.7%	32.5%	43.6%	39	39.0%	57.2%	30.4%	43.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	4.0%	3.5%	18.0%	16.6%
<i>Total</i>	<i>100</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	1	0.3%	0.5%	2.1%	1.8%	19	6.1%	3.5%	7.4%	4.2%
Moderate	28	9.1%	5.8%	9.1%	7.0%	63	20.4%	14.5%	19.1%	13.1%
Middle	220	71.2%	68.5%	57.4%	50.5%	82	26.5%	24.3%	23.3%	20.0%
Upper	60	19.4%	25.1%	31.5%	40.6%	129	41.7%	53.5%	36.5%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	5.2%	4.1%	13.6%	14.8%
<i>Total</i>	<i>309</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>309</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	2.7%	1.1%	35	19.2%	7.6%	11.3%	6.8%
Moderate	21	11.5%	5.4%	11.8%	7.3%	38	20.9%	12.9%	26.2%	17.0%
Middle	134	73.6%	68.3%	63.2%	61.3%	47	25.8%	25.4%	27.3%	22.7%
Upper	27	14.8%	26.4%	22.2%	30.4%	55	30.2%	49.9%	33.6%	48.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	3.8%	4.2%	1.7%	5.1%
<i>Total</i>	<i>182</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>182</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	25.2%	20.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	21.5%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	39.3%	58.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	14.0%	11.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	2	0.3%	0.4%	2.1%	2.8%	61	10.3%	4.3%	8.4%	4.0%
Moderate	57	9.6%	5.5%	9.8%	6.3%	120	20.3%	13.3%	22.3%	14.5%
Middle	422	71.3%	65.6%	57.4%	50.8%	160	27.0%	24.5%	22.0%	17.9%
Upper	111	18.8%	28.6%	30.7%	40.0%	223	37.7%	53.6%	32.2%	41.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	28	4.7%	4.4%	15.0%	22.5%
<i>Total</i>	<i>592</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>592</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

SMALL BUSINESS

	By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
Low	3	1.9%	4.0%	7.7%	11.4%
Moderate	10	6.3%	6.2%	8.3%	7.7%
Middle	113	71.5%	69.6%	49.8%	50.0%
Upper	32	20.3%	20.2%	32.3%	30.3%
Unknown	0	0.0%	0.0%	0.1%	0.2%
Tract Unknown	0	0.0%	0.0%	1.7%	0.4%
<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	115	72.8%	37.9%	37.6%	28.1%
	By Loan Size				
\$100,000 or less	115	72.8%	20.1%	91.8%	28.3%
\$100,001-\$250,000	21	13.3%	20.4%	3.9%	15.8%
\$250,001-\$1 Million	22	13.9%	59.6%	4.3%	56.0%
<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: Non Metropolitan AA

	SMALL FARM				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.2%	0.2%
Middle	17	77.3%	69.2%	88.2%	89.8%
Upper	5	22.7%	30.8%	11.3%	10.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.3%	0.0%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$500,000 or Less	13	59.1%	40.7%	68.0%	61.9%
	By Loan Size				
\$100,000 or less	11	50.0%	14.6%	78.9%	34.5%
\$100,001-\$250,000	10	45.5%	67.1%	15.1%	34.9%
\$250,001-\$1 Million	1	4.5%	18.3%	6.1%	30.6%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2014 Consumer Loan Distribution Table

Assessment Area: MSA 40380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	45	4.6%	1,001	4.5%	172	17.6%	3,446	15.4%
Moderate	128	13.1%	2,964	13.3%	322	32.9%	6,993	31.3%
Middle	621	63.4%	14,000	62.7%	288	29.4%	6,892	30.9%
Upper	185	18.9%	4,348	19.5%	196	20.0%	4,955	22.2%
Unknown	0	0.0%	0	0.0%	1	0.1%	27	0.1%
Total	979	100.0%	22,313	100.0%	979	100.0%	22,313	100.0%

Originations and Purchases

2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 40380

Income Categories	HMDA
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	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.2%	1.3%	3	4.4%	2.4%	9.5%	5.1%
Moderate	10	14.7%	11.2%	11.5%	7.1%	15	22.1%	18.3%	23.1%	16.9%
Middle	46	67.6%	67.1%	56.0%	51.3%	26	38.2%	37.3%	21.4%	20.2%
Upper	12	17.6%	21.6%	30.3%	40.4%	18	26.5%	32.7%	30.9%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	8.8%	9.4%	15.2%	14.4%
<i>Total</i>	<i>68</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>68</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	1	0.4%	0.1%	1.4%	0.8%	25	9.5%	6.2%	7.0%	3.1%
Moderate	30	11.4%	7.8%	8.9%	8.5%	63	24.0%	18.3%	17.3%	10.0%
Middle	198	75.3%	73.8%	54.3%	52.8%	81	30.8%	30.5%	23.6%	16.7%
Upper	34	12.9%	18.3%	35.4%	37.9%	86	32.7%	40.8%	41.7%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	3.0%	4.3%	10.4%	26.7%
<i>Total</i>	<i>263</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>263</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	2.8%	1.2%	21	14.3%	6.2%	12.1%	5.1%
Moderate	16	10.9%	7.7%	14.8%	8.1%	43	29.3%	18.2%	25.6%	17.4%
Middle	115	78.2%	76.7%	61.6%	59.5%	46	31.3%	34.8%	28.2%	25.0%
Upper	16	10.9%	15.6%	20.8%	31.2%	34	23.1%	38.4%	32.3%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.0%	2.4%	1.8%	4.5%
<i>Total</i>	<i>147</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>147</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	23.7%	7.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	33.3%	43.7%	21.4%	12.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	66.7%	56.3%	37.4%	42.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	17.6%	37.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
<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>
	HMDA Totals									
Low	1	0.2%	0.1%	2.1%	1.7%	49	10.2%	5.3%	8.8%	3.8%
Moderate	57	11.9%	9.0%	10.9%	8.2%	121	25.2%	18.0%	21.1%	12.6%
Middle	361	75.1%	72.6%	55.9%	51.3%	153	31.8%	32.3%	22.9%	17.0%
Upper	62	12.9%	18.3%	31.1%	38.8%	138	28.7%	38.1%	35.0%	39.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	4.2%	6.4%	12.2%	27.1%
<i>Total</i>	<i>481</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>481</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

SMALL BUSINESS

	By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	6	3.7%	2.9%	8.0%	10.8%
Moderate	26	15.9%	17.4%	10.7%	11.2%
Middle	100	61.0%	42.0%	50.6%	47.1%
Upper	32	19.5%	37.7%	29.0%	30.2%
Unknown	0	0.0%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	1.6%	0.7%
<i>Total</i>	<i>164</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	92	56.1%	23.3%	40.0%	34.8%
	By Loan Size				
\$100,000 or less	94	57.3%	11.3%	91.3%	29.8%
\$100,001-\$250,000	30	18.3%	16.4%	4.3%	17.2%
\$250,001-\$1 Million	40	24.4%	72.3%	4.4%	53.0%
<i>Total</i>	<i>164</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 40380

	SMALL FARM By Tract Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	0	0.0%	0.0%	0.2%	0.0%
Moderate	0	0.0%	0.0%	9.9%	6.5%
Middle	11	91.7%	91.8%	83.6%	89.3%
Upper	1	8.3%	8.2%	6.1%	4.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.2%	0.0%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$500,000 or Less	6	50.0%	41.5%	63.2%	58.4%
	By Loan Size				
\$100,000 or less	7	58.3%	19.9%	77.8%	32.2%
\$100,001-\$250,000	3	25.0%	32.8%	16.2%	37.9%
\$250,001-\$1 Million	2	16.7%	47.3%	6.0%	29.9%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2013 Consumer Loan Distribution Table

Assessment Area: MSA 40380

Income Categories	Consumer Loan Totals
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	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	19	3.6%	445	3.7%	80	15.2%	1,539	12.7%
Moderate	68	12.9%	1,529	12.7%	179	34.0%	4,149	34.3%
Middle	355	67.5%	8,121	67.2%	145	27.6%	3,334	27.6%
Upper	84	16.0%	1,992	16.5%	122	23.2%	3,066	25.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	526	100.0%	12,087	100.0%	526	100.0%	12,087	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 15380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	30	17.0%	8.4%	4.8%	2.6%	27	15.3%	6.4%	7.2%	3.7%
Moderate	30	17.0%	14.0%	10.3%	6.7%	35	19.9%	12.5%	20.8%	14.6%
Middle	58	33.0%	29.8%	44.4%	38.4%	34	19.3%	15.5%	21.6%	20.0%
Upper	56	31.8%	46.5%	40.5%	52.2%	67	38.1%	57.1%	31.3%	43.7%
Unknown	2	1.1%	1.3%	0.1%	0.1%	13	7.4%	8.5%	19.0%	18.0%
<i>Total</i>	<i>176</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>176</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	3	6.3%	3.5%	3.3%	1.7%	0	0.0%	0.0%	7.2%	3.6%
Moderate	2	4.2%	4.8%	8.4%	5.0%	6	12.5%	6.3%	17.4%	11.3%
Middle	19	39.6%	34.4%	44.6%	34.7%	9	18.8%	11.4%	24.2%	19.5%
Upper	24	50.0%	57.2%	43.8%	58.6%	26	54.2%	68.1%	37.6%	42.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	14.6%	14.2%	13.6%	22.8%
<i>Total</i>	<i>48</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>48</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	9.2%	4.1%	0	0.0%	0.0%	12.0%	4.7%
Moderate	0	0.0%	0.0%	11.8%	7.2%	2	10.5%	6.9%	22.0%	12.9%
Middle	9	47.4%	38.9%	44.6%	41.1%	7	36.8%	24.9%	23.5%	23.1%
Upper	10	52.6%	61.1%	34.3%	47.6%	9	47.4%	67.9%	38.1%	54.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.3%	0.3%	4.4%	5.0%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	14.1%	24.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	66.7%	94.4%	17.6%	8.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	33.3%	5.6%	43.5%	23.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	23.5%	44.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	1.2%	0.5%	3	100.0%	100.0%	100.0%	100.0%
<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>
	HMDA Totals									
Low	33	13.4%	6.1%	4.9%	4.2%	27	11.0%	4.2%	7.6%	3.4%
Moderate	34	13.8%	22.7%	10.0%	6.4%	43	17.5%	9.6%	20.0%	12.6%
Middle	87	35.4%	27.7%	44.4%	36.4%	50	20.3%	13.1%	22.3%	18.3%
Upper	90	36.6%	42.7%	40.6%	52.9%	102	41.5%	51.7%	33.3%	40.3%
Unknown	2	0.8%	0.8%	0.1%	0.1%	24	9.8%	21.4%	16.8%	25.4%
<i>Total</i>	<i>246</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>246</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income			Aggregate	
	#	Bank %	% \$(000s)	%	% \$(000s)
Low	1	2.8%	4.2%	9.4%	11.3%
Moderate	2	5.6%	13.2%	10.2%	11.1%
Middle	10	27.8%	46.3%	33.8%	30.5%
Upper	23	63.9%	36.2%	43.1%	41.9%
Unknown	0	0.0%	0.0%	2.9%	4.9%
Tract Unknown	0	0.0%	0.0%	0.7%	0.4%
<i>Total</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	22	61.1%	42.7%	48.6%	29.9%
	By Loan Size				
\$100,000 or less	19	52.8%	10.0%	91.9%	29.4%
\$100,001-\$250,000	7	19.4%	18.1%	3.7%	15.6%
\$250,001-\$1 Million	10	27.8%	71.9%	4.3%	55.0%
<i>Total</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2017 Consumer Loan Distribution Table

Assessment Area: MSA 15380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	149	9.1%	3,865	9.7%	294	17.9%	5,961	15.0%
Moderate	232	14.1%	5,842	14.7%	541	32.9%	12,713	31.9%
Middle	674	41.0%	15,810	39.7%	403	24.5%	10,269	25.8%
Upper	590	35.9%	14,303	35.9%	407	24.7%	10,876	27.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1,645</i>	<i>100.0%</i>	<i>39,820</i>	<i>100.0%</i>	<i>1,645</i>	<i>100.0%</i>	<i>39,820</i>	<i>100.0%</i>

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 15380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	1	4.0%	4.1%	2.3%	1.4%	0	0.0%	0.0%	7.1%	3.7%
Moderate	3	12.0%	4.5%	11.3%	7.9%	4	16.0%	8.3%	21.8%	15.3%
Middle	14	56.0%	52.0%	43.4%	35.6%	8	32.0%	25.0%	23.0%	21.4%
Upper	7	28.0%	39.4%	43.0%	55.2%	11	44.0%	57.2%	31.2%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	8.0%	9.4%	16.9%	15.6%
<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	2.4%	1.0%	1	2.8%	0.8%	5.6%	2.9%
Moderate	2	5.6%	2.4%	9.8%	6.2%	7	19.4%	15.7%	14.4%	10.4%
Middle	17	47.2%	45.5%	36.8%	30.5%	9	25.0%	22.3%	22.9%	20.2%
Upper	17	47.2%	52.2%	51.1%	62.3%	16	44.4%	43.5%	37.5%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	8.3%	17.7%	19.5%	18.3%
<i>Total</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	5.9%	3.9%	0	0.0%	0.0%	11.6%	4.2%
Moderate	2	9.5%	24.5%	14.2%	9.3%	3	14.3%	7.1%	24.0%	13.8%
Middle	6	28.6%	19.6%	41.0%	32.6%	2	9.5%	4.3%	22.4%	18.6%
Upper	13	61.9%	55.9%	38.8%	54.2%	14	66.7%	65.4%	38.3%	56.7%
Unknown	0	0.0%	0.0%	0.1%	0.0%	2	9.5%	23.2%	3.6%	6.7%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	1	16.7%	2.2%	12.3%	8.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	27.2%	11.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	66.7%	78.9%	33.3%	43.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	16.7%	18.9%	27.2%	36.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	2	2.3%	1.7%	2.6%	1.8%	1	1.1%	0.2%	7.0%	3.3%
Moderate	7	8.0%	5.7%	11.3%	7.8%	14	15.9%	6.6%	19.9%	13.0%
Middle	41	46.6%	55.4%	41.4%	34.8%	19	21.6%	11.0%	22.8%	19.5%
Upper	38	43.2%	37.2%	44.7%	55.6%	41	46.6%	33.0%	33.3%	42.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	14.8%	49.3%	17.0%	21.8%
<i>Total</i>	<i>88</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>88</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				Aggregate
	#	Bank %	% \$(000s)	%	
Low	7	8.0%	7.1%	6.9%	8.7%
Moderate	8	9.1%	10.2%	13.8%	17.0%
Middle	28	31.8%	38.4%	36.1%	34.1%
Upper	45	51.1%	44.3%	42.2%	39.9%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.3%
<i>Total</i>	88	100.0%	100.0%	100.0%	100.0%
	By Revenue				
\$1 Million or Less	54	61.4%	34.6%	45.6%	31.6%
	By Loan Size				
\$100,000 or less	45	51.1%	12.9%	92.0%	29.0%
\$100,001-\$250,000	22	25.0%	22.5%	3.6%	14.3%
\$250,001-\$1 Million	21	23.9%	64.6%	4.4%	56.7%
<i>Total</i>	88	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

2016 Consumer Loan Distribution Table

Assessment Area: MSA 15380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	62	6.6%	1,549	6.7%	178	19.0%	3,634	15.7%
Moderate	156	16.6%	4,018	17.3%	310	33.0%	7,623	32.8%
Middle	415	44.2%	10,281	44.3%	275	29.3%	7,255	31.3%
Upper	305	32.5%	7,361	31.7%	174	18.6%	4,695	20.2%
Unknown	0	0.0%	0	0.0%	1	0.1%	2	0.0%
<i>Total</i>	938	100.0%	23,209	100.0%	938	100.0%	23,209	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 15380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	2.3%	1.2%	2	13.3%	7.1%	9.1%	4.7%
Moderate	5	33.3%	22.7%	11.7%	7.6%	3	20.0%	15.0%	23.6%	16.8%
Middle	6	40.0%	45.7%	42.9%	34.1%	2	13.3%	14.9%	22.1%	20.9%
Upper	4	26.7%	31.6%	43.0%	57.0%	7	46.7%	55.6%	27.7%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	6.7%	7.4%	17.6%	16.8%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	1	3.8%	3.7%	1.8%	1.2%	1	3.8%	1.4%	6.8%	3.8%
Moderate	1	3.8%	1.9%	9.3%	6.1%	1	3.8%	3.7%	17.6%	12.2%
Middle	9	34.6%	26.7%	39.6%	32.6%	5	19.2%	14.6%	24.5%	21.6%
Upper	15	57.7%	67.7%	49.3%	60.0%	12	46.2%	48.0%	34.8%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	26.9%	32.3%	16.3%	17.1%
<i>Total</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	1	6.7%	17.8%	6.3%	2.8%	3	20.0%	4.4%	13.8%	5.3%
Moderate	0	0.0%	0.0%	15.3%	6.9%	4	26.7%	28.5%	25.9%	15.4%
Middle	7	46.7%	35.6%	41.1%	35.8%	3	20.0%	24.9%	23.8%	23.3%
Upper	7	46.7%	46.5%	37.1%	54.5%	4	26.7%	24.4%	32.2%	50.0%
Unknown	0	0.0%	0.0%	0.1%	0.0%	1	6.7%	17.8%	4.2%	6.0%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	19.5%	8.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.4%	2.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	35.6%	22.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	30.5%	66.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	2	3.6%	4.5%	2.6%	2.2%	6	10.7%	3.7%	8.9%	3.9%
Moderate	6	10.7%	8.6%	11.5%	6.7%	8	14.3%	11.1%	22.1%	13.6%
Middle	22	39.3%	34.4%	41.9%	32.3%	10	17.9%	16.2%	22.7%	18.4%
Upper	26	46.4%	52.5%	44.0%	58.8%	23	41.1%	47.0%	29.7%	36.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	16.1%	21.9%	16.6%	27.6%
<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				Aggregate
	#	Bank %	% \$(000s)	%	
Low	6	9.0%	15.2%	6.8%	7.7%
Moderate	5	7.5%	11.6%	12.9%	17.3%
Middle	21	31.3%	33.6%	37.4%	36.3%
Upper	35	52.2%	39.6%	41.8%	38.4%
Unknown	0	0.0%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	1.0%	0.3%
<i>Total</i>	<i>67</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	42	62.7%	43.1%	46.5%	31.4%
	By Loan Size				
\$100,000 or less	35	52.2%	7.9%	91.4%	26.9%
\$100,001-\$250,000	14	20.9%	16.8%	3.7%	14.4%
\$250,001-\$1 Million	18	26.9%	75.3%	4.9%	58.7%
<i>Total</i>	<i>67</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Consumer Loan Distribution Table

Assessment Area: MSA 15380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	41	6.8%	1,011	6.9%	126	20.8%	2,580	17.7%
Moderate	106	17.5%	2,663	18.3%	215	35.4%	5,343	36.7%
Middle	264	43.5%	6,355	43.6%	167	27.5%	4,095	28.1%
Upper	196	32.3%	4,539	31.2%	99	16.3%	2,550	17.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>607</i>	<i>100.0%</i>	<i>14,569</i>	<i>100.0%</i>	<i>607</i>	<i>100.0%</i>	<i>14,569</i>	<i>100.0%</i>

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 15380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	2.3%	1.3%	1	6.3%	5.0%	6.4%	3.2%
Moderate	0	0.0%	0.0%	12.0%	7.7%	2	12.5%	7.0%	23.4%	15.7%
Middle	7	43.8%	32.8%	42.3%	33.9%	5	31.3%	24.2%	22.1%	20.6%
Upper	9	56.3%	67.2%	43.4%	57.1%	7	43.8%	59.8%	32.3%	45.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	6.3%	3.9%	15.8%	14.7%
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	2.0%	1.1%	0	0.0%	0.0%	6.0%	3.1%
Moderate	1	4.8%	1.5%	11.3%	7.3%	3	14.3%	5.9%	17.1%	12.1%
Middle	11	52.4%	33.9%	41.7%	35.4%	7	33.3%	19.9%	22.6%	19.6%
Upper	9	42.9%	64.6%	44.9%	56.2%	10	47.6%	71.1%	36.6%	47.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.8%	3.0%	17.8%	17.6%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	1	4.8%	0.3%	7.1%	5.5%	2	9.5%	0.6%	12.9%	4.4%
Moderate	1	4.8%	5.8%	16.5%	8.1%	6	28.6%	18.9%	24.1%	15.6%
Middle	8	38.1%	39.9%	43.4%	41.3%	3	14.3%	10.2%	22.6%	20.9%
Upper	11	52.4%	53.9%	33.0%	45.1%	9	42.9%	69.7%	35.3%	51.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.8%	0.6%	5.1%	7.9%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	9.2%	1.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	23.0%	6.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	34.5%	20.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	72.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	1	1.7%	0.0%	2.8%	1.3%	3	5.1%	1.8%	6.9%	2.9%
Moderate	3	5.1%	3.6%	12.3%	7.5%	11	18.6%	7.7%	21.8%	13.3%
Middle	26	44.1%	33.5%	42.2%	33.0%	15	25.4%	19.8%	22.2%	18.2%
Upper	29	49.2%	62.8%	42.7%	58.2%	26	44.1%	65.5%	33.4%	41.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	6.8%	5.1%	15.6%	24.2%
<i>Total</i>	<i>59</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>59</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				Aggregate
	#	Bank %	% \$(000s)	%	
Low	4	10.3%	7.0%	6.3%	8.0%
Moderate	5	12.8%	31.9%	13.4%	18.2%
Middle	10	25.6%	31.4%	36.4%	37.0%
Upper	20	51.3%	29.8%	42.5%	36.3%
Unknown	0	0.0%	0.0%	0.2%	0.1%
Tract Unknown	0	0.0%	0.0%	1.2%	0.4%
<i>Total</i>	39	100.0%	100.0%	100.0%	100.0%
	By Revenue				
\$1 Million or Less	17	43.6%	26.7%	40.9%	25.5%
	By Loan Size				
\$100,000 or less	19	48.7%	10.5%	92.7%	29.3%
\$100,001-\$250,000	11	28.2%	25.9%	3.4%	15.2%
\$250,001-\$1 Million	9	23.1%	63.6%	3.9%	55.5%
<i>Total</i>	39	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

2014 Consumer Loan Distribution Table

Assessment Area: MSA 15380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	37	7.7%	929	8.0%	91	18.9%	1,860	16.0%
Moderate	100	20.8%	2,448	21.1%	162	33.7%	4,010	34.5%
Middle	209	43.5%	5,030	43.3%	130	27.0%	3,182	27.4%
Upper	135	28.1%	3,206	27.6%	98	20.4%	2,560	22.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	481	100.0%	11,612	100.0%	481	100.0%	11,612	100.0%

Originations and Purchases

2013 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 15380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.7%	1.2%	0	0.0%	0.0%	7.4%	3.7%
Moderate	0	0.0%	0.0%	11.8%	7.4%	4	20.0%	10.6%	22.4%	15.6%
Middle	7	35.0%	32.4%	41.5%	33.9%	7	35.0%	30.9%	24.2%	22.5%
Upper	13	65.0%	67.6%	44.0%	57.5%	8	40.0%	53.1%	30.9%	44.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.0%	5.5%	15.1%	13.9%
<i>Total</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	1.7%	6.3%	1	6.3%	0.7%	4.9%	2.0%
Moderate	1	6.3%	36.9%	7.8%	3.8%	2	12.5%	3.0%	15.4%	8.4%
Middle	5	31.3%	8.6%	38.5%	31.4%	5	31.3%	12.7%	24.3%	16.2%
Upper	10	62.5%	54.6%	52.0%	58.4%	5	31.3%	18.1%	40.8%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	65.5%	14.6%	32.7%
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	5.9%	2.0%	2	10.5%	2.3%	11.7%	4.2%
Moderate	2	10.5%	1.1%	15.7%	7.7%	2	10.5%	2.4%	24.1%	12.1%
Middle	9	47.4%	36.0%	42.4%	35.7%	6	31.6%	33.8%	27.4%	26.4%
Upper	8	42.1%	62.9%	36.0%	54.6%	8	42.1%	57.1%	32.9%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.3%	4.3%	4.0%	7.3%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	8.2%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	24.5%	9.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	38.8%	36.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	28.6%	47.2%	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>
	HMDA Totals									
Low	0	0.0%	0.0%	2.6%	3.7%	3	5.5%	0.7%	6.7%	2.8%
Moderate	3	5.5%	19.3%	10.6%	6.0%	8	14.5%	5.5%	19.7%	11.7%
Middle	21	38.2%	20.5%	40.4%	33.0%	18	32.7%	21.9%	24.4%	18.9%
Upper	31	56.4%	60.2%	46.4%	57.3%	21	38.2%	35.5%	34.7%	40.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	9.1%	36.4%	14.4%	25.9%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				Aggregate
	#	Bank %	% \$(000s)	%	
Low	6	10.5%	15.1%	6.6%	6.3%
Moderate	3	5.3%	8.8%	12.9%	16.5%
Middle	18	31.6%	31.2%	37.2%	37.3%
Upper	30	52.6%	44.9%	41.8%	39.5%
Unknown	0	0.0%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	1.3%	0.4%
<i>Total</i>	<i>57</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	22	38.6%	19.3%	40.6%	31.1%
	By Loan Size				
\$100,000 or less	24	42.1%	8.8%	91.8%	29.9%
\$100,001-\$250,000	17	29.8%	23.9%	4.3%	18.0%
\$250,001-\$1 Million	16	28.1%	67.3%	4.0%	52.1%
<i>Total</i>	<i>57</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2013 Consumer Loan Distribution Table

Assessment Area: MSA 15380

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	24	10.7%	587	10.8%	35	15.6%	741	13.6%
Moderate	45	20.0%	1,101	20.3%	77	34.2%	1,820	33.5%
Middle	100	44.4%	2,402	44.2%	71	31.6%	1,782	32.8%
Upper	56	24.9%	1,342	24.7%	42	18.7%	1,089	20.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>225</i>	<i>100.0%</i>	<i>5,432</i>	<i>100.0%</i>	<i>225</i>	<i>100.0%</i>	<i>5,432</i>	<i>100.0%</i>

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	3.2%	1.6%	0	0.0%	0.0%	9.3%	5.4%
Moderate	1	20.0%	15.1%	9.3%	6.4%	4	80.0%	57.7%	21.7%	15.6%
Middle	3	60.0%	68.7%	54.1%	49.0%	0	0.0%	0.0%	21.5%	20.3%
Upper	1	20.0%	16.2%	33.3%	43.0%	1	20.0%	42.3%	29.4%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.1%	16.0%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	3.2%	1.7%	2	28.6%	22.5%	7.6%	4.0%
Moderate	1	14.3%	4.0%	8.4%	4.6%	2	28.6%	13.0%	15.8%	11.5%
Middle	4	57.1%	60.7%	53.7%	53.4%	2	28.6%	26.4%	22.4%	19.6%
Upper	2	28.6%	35.3%	34.7%	40.3%	1	14.3%	38.0%	43.3%	53.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.8%	11.4%
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	2	20.0%	15.6%	5.3%	3.0%	1	10.0%	1.6%	13.5%	6.2%
Moderate	3	30.0%	6.6%	8.2%	5.2%	3	30.0%	20.5%	19.2%	14.7%
Middle	4	40.0%	31.1%	55.5%	55.4%	5	50.0%	76.2%	30.0%	26.8%
Upper	1	10.0%	46.7%	31.0%	36.4%	1	10.0%	1.6%	34.8%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.5%	7.8%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	25.0%	3.0%	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%	75.0%	97.0%	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%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	2	9.1%	1.7%	3.8%	1.8%	3	13.6%	12.7%	10.1%	5.0%
Moderate	5	22.7%	8.0%	8.8%	5.8%	9	40.9%	28.7%	19.7%	14.3%
Middle	11	50.0%	60.1%	54.4%	51.5%	7	31.8%	23.1%	24.0%	20.3%
Upper	4	18.2%	30.2%	32.9%	40.9%	3	13.6%	35.5%	33.8%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.4%	16.0%
<i>Total</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				Aggregate
	#	Bank %	% \$(000s)	%	
Low	0	0.0%	0.0%	15.6%	23.7%
Moderate	2	22.2%	32.5%	13.5%	21.6%
Middle	4	44.4%	51.5%	40.3%	29.9%
Upper	3	33.3%	15.9%	29.4%	24.2%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	0.9%	0.7%
<i>Total</i>	9	100.0%	100.0%	100.0%	100.0%
	By Revenue				
\$1 Million or Less	5	55.6%	37.2%	39.6%	27.0%
	By Loan Size				
\$100,000 or less	5	55.6%	15.9%	89.2%	21.6%
\$100,001-\$250,000	3	33.3%	58.9%	4.7%	16.9%
\$250,001-\$1 Million	1	11.1%	25.2%	6.0%	61.5%
<i>Total</i>	9	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

2017 Consumer Loan Distribution Table

Assessment Area: MSA 21300

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	4	5.8%	102	6.5%	8	11.6%	144	9.1%
Moderate	12	17.4%	254	16.1%	15	21.7%	320	20.3%
Middle	31	44.9%	685	43.5%	21	30.4%	479	30.4%
Upper	22	31.9%	535	34.0%	24	34.8%	627	39.8%
Unknown	0	0.0%	0	0.0%	1	1.4%	6	0.4%
<i>Total</i>	69	100.0%	1,576	100.0%	69	100.0%	1,576	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	0.9%	0.5%	6	31.6%	23.3%	8.5%	4.3%
Moderate	3	15.8%	9.3%	18.3%	11.7%	6	31.6%	24.5%	19.9%	14.2%
Middle	12	63.2%	63.7%	39.0%	35.5%	4	21.1%	17.9%	23.4%	20.9%
Upper	4	21.1%	27.0%	41.8%	52.3%	3	15.8%	34.3%	32.6%	47.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.7%	13.3%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	1	4.3%	2.2%	0.2%	0.1%	2	8.7%	5.2%	6.5%	3.6%
Moderate	4	17.4%	7.9%	22.0%	14.9%	7	30.4%	17.0%	17.9%	12.4%
Middle	10	43.5%	50.0%	37.3%	33.2%	4	17.4%	16.2%	20.6%	17.8%
Upper	8	34.8%	39.9%	40.5%	51.7%	9	39.1%	58.3%	43.0%	52.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.3%	3.3%	12.0%	13.8%
<i>Total</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	3.1%	3.2%	3	15.8%	7.9%	11.8%	6.2%
Moderate	6	31.6%	12.9%	21.7%	19.6%	6	31.6%	29.8%	17.5%	13.3%
Middle	8	42.1%	36.4%	41.7%	39.2%	3	15.8%	9.2%	29.4%	22.8%
Upper	5	26.3%	50.7%	33.6%	38.0%	7	36.8%	53.1%	38.2%	54.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.1%	3.5%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	66.7%	72.1%	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%	33.3%	27.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	1	1.6%	1.1%	1.3%	0.6%	11	18.0%	11.5%	8.8%	4.2%
Moderate	13	21.3%	9.3%	20.2%	13.8%	19	31.1%	21.7%	18.7%	13.5%
Middle	30	49.2%	52.0%	39.2%	34.8%	11	18.0%	15.5%	24.1%	20.0%
Upper	17	27.9%	37.7%	39.4%	50.8%	19	31.1%	49.6%	36.7%	48.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.6%	1.7%	11.7%	13.5%
<i>Total</i>	<i>61</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>61</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				
	Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)
Low	2	16.7%	8.4%	12.3%	12.5%
Moderate	3	25.0%	26.9%	24.6%	35.9%
Middle	3	25.0%	20.0%	29.9%	20.4%
Upper	4	33.3%	44.7%	32.1%	30.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.0%	0.6%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	9	75.0%	54.3%	39.7%	26.2%
	By Loan Size				
\$100,000 or less	11	91.7%	75.0%	89.1%	22.2%
\$100,001-\$250,000	1	8.3%	25.0%	5.2%	17.0%
\$250,001-\$1 Million	0	0.0%	0.0%	5.7%	60.7%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2016 Consumer Loan Distribution Table

Assessment Area: MSA 21300

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	4	7.7%	84	6.4%	10	19.2%	169	12.8%
Moderate	17	32.7%	441	33.2%	19	36.5%	424	31.9%
Middle	15	28.8%	408	30.7%	10	19.2%	255	19.2%
Upper	16	30.8%	395	29.7%	13	25.0%	479	36.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>52</i>	<i>100.0%</i>	<i>1,328</i>	<i>100.0%</i>	<i>52</i>	<i>100.0%</i>	<i>1,328</i>	<i>100.0%</i>

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	1.6%	0.8%	2	20.0%	12.6%	11.8%	6.5%
Moderate	1	10.0%	5.0%	24.2%	17.1%	3	30.0%	20.7%	22.9%	17.5%
Middle	4	40.0%	36.2%	38.2%	34.8%	2	20.0%	22.3%	26.2%	25.9%
Upper	5	50.0%	58.8%	36.1%	47.3%	2	20.0%	35.3%	25.7%	38.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	9.0%	13.4%	12.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	0.9%	0.4%	2	18.2%	10.8%	10.0%	5.2%
Moderate	1	9.1%	4.7%	22.3%	16.0%	2	18.2%	15.0%	17.0%	11.6%
Middle	7	63.6%	74.2%	34.7%	31.0%	4	36.4%	51.6%	24.7%	22.5%
Upper	3	27.3%	21.2%	42.1%	52.6%	3	27.3%	22.6%	40.4%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.9%	8.2%
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	2.8%	1.6%	3	15.8%	16.4%	12.3%	7.3%
Moderate	3	15.8%	2.2%	22.8%	17.0%	7	36.8%	11.3%	26.3%	17.5%
Middle	10	52.6%	64.2%	38.3%	38.4%	4	21.1%	49.1%	28.0%	29.4%
Upper	6	31.6%	33.6%	36.0%	43.0%	3	15.8%	18.3%	30.3%	39.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	5.0%	3.0%	6.4%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	7.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	92.9%	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%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	0	0.0%	0.0%	1.8%	0.7%	7	17.5%	12.7%	11.5%	5.7%
Moderate	5	12.5%	4.3%	23.3%	16.0%	12	30.0%	16.5%	22.3%	14.5%
Middle	21	52.5%	57.0%	37.3%	38.5%	10	25.0%	39.5%	26.3%	23.3%
Upper	14	35.0%	38.7%	37.6%	44.8%	8	20.0%	26.7%	31.0%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	7.5%	4.6%	8.9%	17.2%
<i>Total</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				Aggregate
	#	Bank %	% \$(000s)	%	
Low	0	0.0%	0.0%	15.3%	18.7%
Moderate	1	8.3%	20.2%	23.9%	36.0%
Middle	8	66.7%	49.4%	30.9%	21.7%
Upper	3	25.0%	30.4%	28.5%	23.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.7%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	9	75.0%	41.7%	36.3%	28.4%
	By Loan Size				
\$100,000 or less	7	58.3%	7.8%	89.6%	25.8%
\$100,001-\$250,000	3	25.0%	41.5%	4.7%	16.4%
\$250,001-\$1 Million	2	16.7%	50.7%	5.6%	57.8%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2015 Consumer Loan Distribution Table

Assessment Area: MSA 21300

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	2	5.4%	58	5.9%	7	18.9%	153	15.6%
Moderate	13	35.1%	367	37.6%	11	29.7%	265	27.1%
Middle	14	37.8%	373	38.2%	10	27.0%	251	25.7%
Upper	8	21.6%	179	18.3%	9	24.3%	308	31.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>37</i>	<i>100.0%</i>	<i>976</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>976</i>	<i>100.0%</i>

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.6%	0.6%	1	16.7%	6.9%	9.7%	4.8%
Moderate	2	33.3%	20.6%	25.0%	15.3%	1	16.7%	17.0%	24.3%	17.8%
Middle	1	16.7%	41.1%	34.1%	31.9%	1	16.7%	11.7%	25.4%	22.4%
Upper	3	50.0%	38.3%	39.3%	52.2%	3	50.0%	64.4%	30.4%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.2%	10.0%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	1.5%	0.6%	1	7.7%	6.3%	9.2%	5.9%
Moderate	2	15.4%	14.4%	17.9%	11.4%	5	38.5%	26.7%	18.6%	14.3%
Middle	5	38.5%	27.2%	43.4%	42.5%	0	0.0%	0.0%	25.6%	21.5%
Upper	6	46.2%	58.4%	37.2%	45.5%	7	53.8%	67.1%	38.3%	47.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.3%	11.3%
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	3.9%	2.6%	1	5.6%	2.0%	14.3%	6.4%
Moderate	2	11.1%	16.4%	21.5%	17.3%	5	27.8%	14.9%	25.4%	18.0%
Middle	9	50.0%	33.9%	41.3%	40.0%	7	38.9%	47.4%	27.3%	25.2%
Upper	7	38.9%	49.7%	33.3%	40.2%	4	22.2%	31.6%	29.8%	46.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	4.1%	3.2%	4.0%
<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	0	0.0%	0.0%	50.0%	5.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	16.7%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	16.7%	6.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	77.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	2.4%	0.9%	3	8.1%	4.6%	10.9%	5.1%
Moderate	6	16.2%	16.3%	22.0%	14.3%	11	29.7%	19.9%	23.0%	16.3%
Middle	15	40.5%	32.5%	38.7%	34.8%	8	21.6%	22.4%	25.9%	21.8%
Upper	16	43.2%	51.1%	36.9%	49.9%	14	37.8%	51.4%	32.3%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.7%	1.7%	7.9%	12.4%
<i>Total</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				
	Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)
Low	3	14.3%	48.1%	14.7%	19.8%
Moderate	2	9.5%	0.6%	26.0%	34.9%
Middle	5	23.8%	4.6%	27.5%	17.8%
Upper	11	52.4%	46.7%	30.3%	27.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.5%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	8	38.1%	5.5%	29.1%	23.5%
	By Loan Size				
\$100,000 or less	16	76.2%	25.3%	90.0%	25.8%
\$100,001-\$250,000	3	14.3%	31.4%	4.2%	16.2%
\$250,001-\$1 Million	2	9.5%	43.2%	5.7%	58.0%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2014 Consumer Loan Distribution Table

Assessment Area: MSA 21300

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	6	33.3%	106	23.8%
Moderate	5	27.8%	118	26.6%	2	11.1%	67	15.1%
Middle	9	50.0%	230	51.8%	5	27.8%	92	20.8%
Upper	4	22.2%	96	21.6%	5	27.8%	179	40.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>444</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>444</i>	<i>100.0%</i>

Originations and Purchases

2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	0	0.0%	0.0%	1.5%	0.5%	0	0.0%	0.0%	6.1%	3.4%
Moderate	2	14.3%	6.3%	21.2%	14.5%	4	28.6%	16.9%	21.7%	14.4%
Middle	7	50.0%	39.2%	38.0%	34.3%	2	14.3%	7.7%	27.6%	25.2%
Upper	5	35.7%	54.5%	39.3%	50.7%	8	57.1%	75.4%	35.8%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.8%	8.3%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	0.8%	0.2%	4	13.3%	6.6%	5.7%	2.2%
Moderate	5	16.7%	8.4%	17.9%	41.9%	7	23.3%	13.6%	14.5%	6.9%
Middle	10	33.3%	31.6%	40.3%	24.1%	5	16.7%	18.6%	26.2%	14.0%
Upper	15	50.0%	60.0%	41.0%	33.8%	11	36.7%	48.5%	45.8%	37.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	10.0%	12.7%	7.8%	39.5%
<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	1	6.3%	0.7%	1.8%	0.7%	3	18.8%	2.3%	8.1%	3.5%
Moderate	3	18.8%	16.7%	24.7%	17.7%	5	31.3%	34.5%	20.1%	13.8%
Middle	7	43.8%	57.3%	40.0%	39.7%	2	12.5%	18.1%	31.7%	24.7%
Upper	5	31.3%	25.3%	33.5%	41.9%	6	37.5%	45.1%	36.5%	54.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	3.6%
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	33.3%	0.8%	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%	33.3%	67.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	33.3%	31.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	1	1.6%	0.0%	1.3%	0.4%	7	11.5%	1.6%	6.5%	2.5%
Moderate	10	16.4%	3.7%	20.8%	26.5%	16	26.2%	7.4%	18.5%	9.7%
Middle	24	39.3%	16.1%	39.4%	32.5%	9	14.8%	6.3%	28.1%	17.8%
Upper	26	42.6%	80.1%	38.5%	40.6%	25	41.0%	25.0%	39.7%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	6.6%	59.7%	7.2%	30.1%
<i>Total</i>	<i>61</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>61</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

	SMALL BUSINESS				
	By Tract Income				
	Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)
Low	7	43.8%	42.6%	16.7%	23.5%
Moderate	4	25.0%	47.8%	24.7%	36.4%
Middle	1	6.3%	0.3%	29.6%	14.5%
Upper	4	25.0%	9.3%	27.9%	24.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.0%	0.9%
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	By Revenue				
\$1 Million or Less	5	31.3%	27.4%	31.9%	25.1%
	By Loan Size				
\$100,000 or less	7	43.8%	9.8%	88.5%	24.7%
\$100,001-\$250,000	4	25.0%	21.9%	6.0%	20.7%
\$250,001-\$1 Million	5	31.3%	68.3%	5.4%	54.7%
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2013 Consumer Loan Distribution Table

Assessment Area: MSA 21300

Income Categories	Consumer Loan Totals							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	1	10.0%	23	10.3%	3	30.0%	53	23.2%
Moderate	4	40.0%	74	32.5%	2	20.0%	32	13.9%
Middle	3	30.0%	107	46.9%	4	40.0%	108	47.4%
Upper	2	20.0%	23	10.3%	1	10.0%	35	15.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>228</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>228</i>	<i>100.0%</i>

Originations and Purchases

CRA APPENDIX B

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		Lending: January 1, 2013 – December 31, 2017 Community Development Activity: October 1, 2013 – September 30, 2018	
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Five Star Bank 29 North Main Street, Warsaw, NY 14203			Home Purchase Refinancings Home Improvement Small Business Small Farm Consumer (Motor Vehicle)
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None			
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
STATE OF NEW YORK Non Metropolitan Assessment Area MSA 40380 (Rochester, NY) MSA 15380 (Buffalo-Cheektowaga-Niagara- Falls, NY) MSA 21300 (Elmira, NY)	Full-scope review Full-scope review Full-scope Review Limited-scope review	None	None

CRA APPENDIX C

GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Distressed or Underserved Non-Metropolitan Middle Income Area- A middle-income, nonmetropolitan geography that is distressed due to economic factors, such as unemployment levels, poverty, or population loss, or is underserved based on population size, density and dispersion.

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (“HMDA”): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

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

Limited-scope review: Performance is analyzed using only quantitative factors.

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.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA assessment area.

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

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

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

Multifamily: Refers to a residential structure that contains five or more units.

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.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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.

Small loan(s) to farm(s): A loan included in "loan to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and either are secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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.

CRA APPENDIX D

Five Star Bank
Assessment Area

