

PUBLIC DISCLOSURE

November 26, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Solvay Bank
RSSD No. 722816**

**1537 Milton Avenue
Solvay, NY 13209**

FEDERAL RESERVE BANK OF NEW YORK

**33 LIBERTY STREET
NEW YORK, NY 10045**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING: Solvay Bank is rated “**SATISFACTORY.**”

The following table indicates the performance level of the institution with respect to the lending and community development tests.

PERFORMANCE LEVELS	SOLVAY BANK PERFORMANCE TESTS	
	Lending Test	Community Development Test
Outstanding		X
Satisfactory	X	
Needs to Improve		
Substantial Noncompliance		

The satisfactory performance of Solvay Bank (“Solvay”) with regard to the Community Reinvestment Act (“CRA”) is based on the following performance criteria:

- The level of community development loans, qualified investments and community development services was excellent.
- A substantial majority of loans were made in the assessment area.
- The bank’s loan-to-deposit ratio was reasonable.
- The overall distribution of loans to borrowers of different incomes and businesses of different sizes reflects reasonable penetration.
- The overall geographic distribution of loans, reflects reasonable dispersion throughout the assessment area.

DESCRIPTION OF INSTITUTION*

Total assets	\$472 million
Net loans & leases	\$337 million
Total domestic deposits	\$407 million
Number of branches	7
Headquarters	Solvay, N.Y.
Bank holding company	Solvay Bank Corporation, Inc.

*Data as of December 31, 2006

Established in 1917, Solvay is a New York State-chartered banking corporation headquartered in Solvay, New York. As of December 31, 2006, Solvay operated seven full-service branch offices throughout Onondaga County in central New York State. Based on data reported to the Federal Deposit Insurance Corporation (“FDIC”), the bank’s deposits represented 6% of all bank branch deposits in Onondaga County as of June 30, 2007. The bank offers various financial products and services to consumers and small to medium-sized businesses.

The bank’s market is highly competitive with branches of numerous local, regional and multinational banks, mortgage companies, and other financial institutions operating in its assessment area. Solvay’s primary bank competitors include Manufacturers and Traders Trust Company, Key Bank, HSBC Bank, JP Morgan Chase Bank, Bank of America, Alliance Bank and Citizens Bank.

Solvay’s previous CRA examination was dated November 7, 2005, and the bank received an overall rating of “Satisfactory” when using the intermediate small bank evaluation procedures. There are no financial or legal factors preventing Solvay from serving credit needs in its assessment area.

DESCRIPTION OF THE BANK’S ASSESSMENT AREA

Solvay’s assessment area consists of Onondaga County, New York which includes the city of Syracuse, New York. The assessment area is located in Metropolitan Statistical Area (“MSA”) 45060 (Syracuse, NY). The assessment area is unchanged since the previous examination and does not arbitrarily exclude low- or moderate-income (“LMI”) geographies. A map illustrating Solvay’s assessment area is on page BB16.

SCOPE OF EXAMINATION

Solvay’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s Intermediate Small Bank Examination Procedures, consisting of lending and community development tests.

Retail loan products evaluated include home purchase, refinance, home improvement, and small business loans. A sample of HMDA-related and small business loans was analyzed. Loans for analysis were selected using the Board of Governors’ sampling procedures and data was verified

as part of the onsite exam. The loan sample review period covered January 1, 2005 through December 31, 2006, and included a sample of 160 HMDA-related loans and 177 small business loans. Community development activities occurring January 1, 2005 through December 31, 2006 were also reviewed.

Examiners also conducted interviews with four community development organizations in order to gain an understanding of local credit needs. Community contacts emphasized the need for affordable housing for LMI individuals.

PERFORMANCE CONTEXT

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

Demographic Characteristics

According to the 2000 Census, Onondaga County's population totals 458,336. The city of Syracuse has a population of 147,306, which represents 32% of the county's population. The city's population has experienced a 10.6% decline since the 1990 Census.

Income Characteristics

The HUD-adjusted median family income for the MSA was \$57,400 in 2005 and \$59,500 in 2006. Based on the 2000 Census, of the 144 census tracts included in the analysis, 44 or 31% are LMI. All but two of the LMI census tracts are located in the city of Syracuse.

Housing Characteristics

The assessment area contains 196,633 housing units, of which 59% are owner-occupied. Twelve percent of owner-occupied housing units are in low- and moderate-income census tracts and represent 26% of total housing units in the low- and moderate-income census tracts. Demographic information from the 2000 Census estimated that the median age of the housing stock in the assessment area to be 43 years. Given the age of the housing stock community contacts have stated that there is a need for home improvement and home rehabilitation loans.

Median Home Sales Prices		
Area	2005	2006
Syracuse-Onondaga Cty.	\$123,000	\$125,000

Source: New York Association of Realtors

As shown in the table at left, the median sales price of existing single-family homes in Greater Syracuse/Onondaga County was \$123,000 as of December 2005, and increased to \$125,000 as of December 2006. Community contacts noted that low-cost housing opportunities

exist in Syracuse, but a lack of local jobs, inadequate income and costs associated with housing maintenance and improvements combine to prevent many lower income families from owning homes. In 2006, the median sales price of homes in Onondaga County was 4.2 times the median family income of a low-income individual and 2.6 times the median family income of a moderate-income individual. Housing affordability, therefore, may be difficult for low-income individuals.

Labor, Employment and Economic Characteristics

The service industry, primarily health care and educational services, is the MSA's dominant industry, providing 44% of employment according to the 2000 Census. Manufacturing is the second largest source of jobs and retail trade is third. Although the manufacturing sector is not adding new jobs, job losses have subsided, indicating this sector of the local economy has stabilized.

According to a community contact, while the city's population has declined, the suburbs, and principally North Syracuse, have shown some growth. This increase has been largely due to growth in the high tech sector.

MSA unemployment rates remained relatively constant during the examination period, although they are higher for the city of Syracuse than for the MSA. The trend in the unemployment rate reflects an improved economic climate but the high levels still reflect a need for further economic development, particularly in the city.

Average Annual Unemployment Rates		
Area	2005	2006
MSA 45060 (Syracuse, NY)	4.8%	4.5%
City of Syracuse	5.6%	5.3%

The chart on the next page provides additional assessment area demographics.

Assessment Area Demographics								
Assessment Area : Onondaga County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	21	14.6	9,346	8.0	3,630	38.8	22,805	19.6
Moderate-income	23	16.0	13,415	11.6	2,668	19.9	19,870	17.1
Middle-income	56	38.9	50,194	43.2	2,617	5.2	24,450	21.1
Upper-income	44	30.6	43,181	37.2	1,033	2.4	49,011	42.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	144	100.0	116,136	100.0	9,948	8.6	116,136	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	24,371	3,935	3.4	16.1	15,983	65.6	4,453	18.3
Moderate-income	29,334	9,789	8.4	33.4	16,018	54.6	3,527	12.0
Middle-income	80,498	55,217	47.3	68.6	20,827	25.9	4,454	5.5
Upper-income	62,430	47,874	41.0	76.7	11,510	18.4	3,046	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	196,633	116,815	100.0	59.4	64,338	32.7	15,480	7.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3,011	18.0	2,445	16.9	503	26.0	63	17.1
Moderate-income	1,474	8.8	1,274	8.8	177	9.1	23	6.3
Middle-income	7,075	42.2	5,994	41.5	911	47.0	170	46.2
Upper-income	5,205	31.0	4,746	32.8	347	17.9	112	30.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	16,765	100.0	14,459	100.0	1,938	100.0	368	100.0
	Percentage of Total Businesses:			86.2		11.6		2.2

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Solvay's record of meeting the credit needs of its assessment areas through its lending performance is rated satisfactory. Solvay originated a substantial majority of its loans within its assessment area and its loan-to-deposit ratio was reasonable. The overall distribution of loans to borrowers of different incomes and businesses of different sizes was reasonable. The geographic distribution of loans reflects reasonable penetration throughout the bank's assessment area.

Loan-to-Deposit Ratio

Solvay's loan-to-deposit ratio was reasonable given the bank's size, financial condition, and the credit needs of its assessment area. The bank's average loan-to-deposit ratio for the eight most recent quarters ending December 31, 2006, was 78%, based on information contained

in its *Consolidated Report of Condition and Income*. This ratio was somewhat below the national peer average of 86% for similarly-sized banks and an average of 86% for 4 similarly-sized banks located in the assessment area during the same time period.

Lending in Assessment Area

Solvay originated a substantial majority of its loans in its assessment area. Of the sampled 177 small business loans and 160 HMDA-related loans originated in 2005 and 2006, 171 or 97% of the small business loans, and 149 or 93% of the HMDA loans, were extended to businesses and individuals located in the bank's assessment area.

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

The overall distribution of borrowers reflects a reasonable penetration among individuals of different income levels and businesses of different sizes within the assessment area. Performance overall in HMDA-related lending to borrowers of different income levels was outstanding based on excellent performance with moderate-income borrowers. Performance was excellent as 22% of Solvay's HMDA-related lending was originated to moderate-income borrowers while 17% of all families in the assessment area are moderate-income.

Performance in lending to low-income borrowers was adequate, as 7% of Solvay's loans were originated to low-income borrowers while 20% of all families in the assessment area are low-income. Performance conclusions in HMDA-related lending to low-income borrowers considered the housing affordability issues facing many low-income borrowers, as noted in the performance context section of this evaluation. Solvay's performance was similar to the aggregate in lending to both low- and moderate-income borrowers.

The table on the following page summarizes the bank's performance with respect to lending to low- and moderate-income borrowers.

Borrower Distribution of HMDA Related Loans*	
January 1, 2005 - December 31, 2006	
LOW-INCOME:	
Less than 50% of Median Income	
Number	10
Percentage	7.2%
Amount (\$)	\$208,000
Percentage	2.2%
MODERATE-INCOME:	
At least 50% & less than 80% of Median Income	
Number	30
Percentage	21.7%
Amount (\$)	\$1,474,000
Percentage	15.6%
MIDDLE-INCOME:	
At least 80% & less than 120% of Median Income	
Number	39
Percentage	28.3%
Amount (\$)	\$2,031,000
Percentage	21.5%
UPPER-INCOME:	
120% or more of Median Income	
Number	59
Percentage	42.8%
Amount (\$)	\$5,737,000
Percentage	60.7%

*Does not include 11 HMDA-related loans which did not report income.

Lending to businesses of different sizes was reasonable. Solvay originated 62% of its business loans to businesses with gross annual revenues (“GAR”) of \$1 million dollars or less compared to 86% of all business establishments in Solvay’s assessment area having GAR of less than \$1,000,000. In addition, 134 loans or 78% were in amounts \$100,000 or less. The average loan size was \$39,373, an amount reflecting the credit needs of smaller businesses. Performance is significantly above the aggregate, which reported 35% of its loans to businesses with GAR of less than \$1,000,000. However, performance is slightly weaker than last examination when 69% of its small business loans went to such businesses.

The following table summarizes the bank's performance in lending to businesses of different sizes.

Distribution of Loans in Assessment Area by Size of Business January 1, 2005 – December 31, 2006					
SMALL BUSINESS LENDING SUMMARY					
Number of loans to businesses	Number of loans to <u>small</u> businesses*	% of loans to <u>small</u> businesses	\$ amount of loans to businesses	\$ amount of loans to <u>small</u> businesses*	% of \$ amount of loans to <u>small</u> businesses*
171	106	62%	\$15,693,000	\$5,896,000	38%

Geographic Distribution of Loans

The overall geographic distribution of HMDA-related and small business loans reflected reasonable loan penetration throughout Solvay's assessment area given the demographics of the bank's assessment area as discussed in the performance context section. Small business loan penetration was considered excellent while HMDA-related penetration was poor.

HMDA-related Loans

The distribution of HMDA-related lending was poor. Of the 149 HMDA-related loans included in the sample and within the bank's assessment area, 1% were originated in low-income census tracts and 3% were originated in moderate-income census tracts compared to 3% and 8%, respectively, of owner-occupied housing units located in these tracts.

Performance was significantly below the aggregate, which reported 4% and 9% of its loans in low- and moderate-income census tracts, respectively.

Small Business Loans

The distribution of small business loans in moderate-income census tracts was excellent compared with both the percentage of businesses located in moderate-income census tracts as well as the performance of the aggregate of all CRA-reporting lenders. Eleven percent of the small business loans were originated in moderate-income census tracts compared to 9% of the businesses and 7% of the aggregate's lending located in moderate-income census tracts.

Small business performance in low-income census tracts was reasonable compared with both the percentage of businesses in low-income census tracts and the performance of the aggregate of all CRA-reporting lenders. Fifteen percent of the bank's small business loans were originated in

* Businesses with gross annual revenues of \$1 million or less.

low-income census tracts compared to 18% of the businesses and 13% of the aggregate's lending located in low-income census tracts.

Response to Complaints

Solvay did not receive any complaints relating to the bank's CRA performance, and no complaints have been filed with the Federal Reserve Bank of New York since the previous examination.

COMMUNITY DEVELOPMENT TEST

Solvay's community development performance demonstrates excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of opportunities for community development in the Solvay's assessment area. During the examination period, loans and qualified investments benefiting its assessment area totaled \$8.5 million. Community development volume has increased substantially from the \$4.3 million reported at the last exam. Community development activities consisted of \$4.5 million in new community development loans and qualified investments and \$4 million from the prior examination period.

As shown in the table to the right, the bank's community development efforts went primarily to support economic development and affordable housing initiatives. Additionally, qualified investments included municipal bonds that assisted in revitalizing moderate-income census tracts.

CD Loans and Qualified Investments		
Purpose	%	\$('000s)
Affordable Housing	24	\$2,065
Community Services	5	\$404
Economic Development	57	\$4,798
Revitalize and Stabilize	14	\$1,182
Totals	100	\$8,449

The level of Solvay's community development activities compared favorably with other similarly-situated banks operating in the assessment area. Examples of community development loans and qualified investments originated during the evaluation period include:

Community Development Loans

- A \$1,000,000 line of credit to an organization which finances contractors specializing in renovating and constructing homes, the majority of which are in LMI areas and are affordable to LMI individuals.
- A \$500,000 construction loan to renovate a building in a low-income area of Syracuse. The property is also located in an Empire Development Zone. The renovations will create 32 new apartments which will be rented to LMI individuals.

Qualified Investments

- A \$125,000 investment in a fund which supports LMI neighborhoods through home improvement loans to LMI individuals.
- Six municipal bonds totaling \$1,182,400 for infrastructure improvements to streets and sewers in moderate-income areas of the assessment area. Revitalizing and stabilizing low- and moderate-income areas is an important need in the assessment area.

Community Development Services

Solvay provided a good level of community development services in its assessment area. Bank officers and employees provided professional services to local organizations that provide technical assistance, promote economic development and affordable housing, credit counseling, youth and scholarship programs to LMI individuals in the assessment area. Additionally, several bank personnel have made financial education presentations including loan, housing and small business seminars to various groups in the assessment area.

Six bank officers serve on the boards and committees of 12 community development organizations. These organizations include:

- A non-profit organization that provides home purchase, rehabilitation and home improvement loans to LMI residents and first time home buyers. One officer serves on the loan committee.
- An economic development organization that assists the needs of businesses in the greater Syracuse area by making loans and promoting economic development. One officer serves as a member of the board of directors.
- Two officers serve as members of the board of directors for an organization dedicated to providing repairs to the homes of low-income, disabled, and elderly homeowners.
- One officer serves as executive vice president for a non-profit organization that trains managers from local non-profit agencies that serve predominately low-income and minority populations.
- One officer is a member of the board of directors for a non-profit organization that assists low- and moderate-income residents start, expand, or enhance small businesses through skill training.

In addition, the overall branch distribution provides excellent accessibility to the LMI population and geographies within the assessment area. Three of seven branches or 43% were located in LMI census tracts, providing needed financial services to these areas. One of the branches is Solvay's main office and headquarters, which brings additional jobs and related financial services to a moderate-income area. In comparison, 25% of the assessment area population resides in LMI census tracts and 31% of the census tracts in the assessment area are LMI.

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 credit practices were identified as being inconsistent with helping to meet the credit needs of the community.

CRA APPENDIX A

GLOSSARY

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

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

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

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

Low-income: Individual income that is less than 50% of the area median income, or a median family income that is less than 50%, in the case of a geography.

Metropolitan 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.

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

Moderate-income: Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, in the case of a geography.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share or grant that has as its primary purpose community development.

Small loan(s) to business(es): A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (“Call Report”) and the Thrift Financial Reporting (“TFR”) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Upper-income: Individual income that is more than 120% of the area median income, or a median family income that is more than 120%, in the case of a geography.

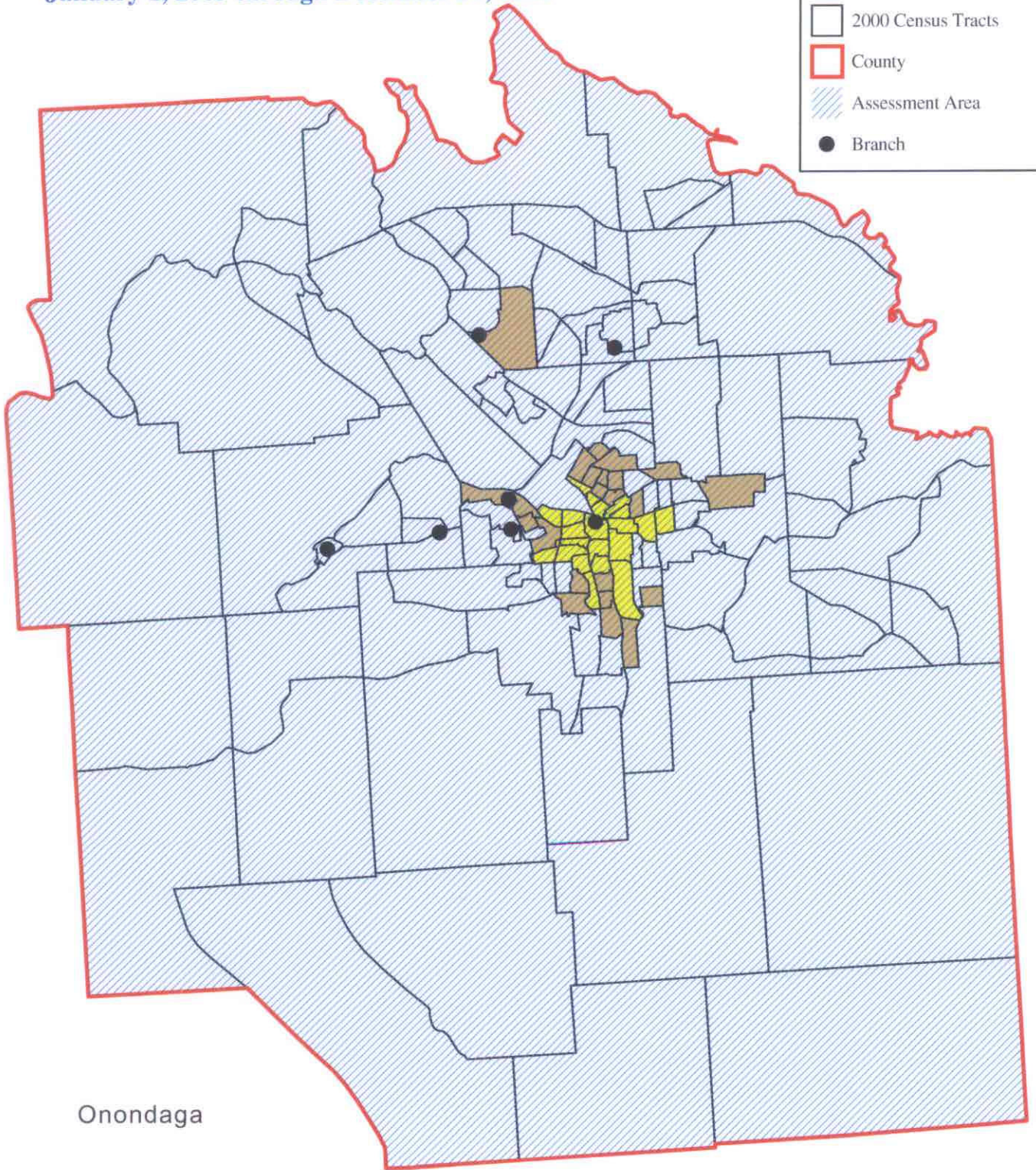
Solvay Bank

Assessment Area

January 1, 2005 through December 31, 2006

Legend

- Low Income Tracts
- Moderate income Tracts
- 2000 Census Tracts
- County
- Assessment Area
- Branch



Onondaga

Miles

