

PUBLIC DISCLOSURE

August 13, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Tioga State Bank
RSSD No. 910118

1 North Main Street
P.O. Box 386
Spencer, New York 14883

FEDERAL RESERVE BANK OF NEW YORK
33 LIBERTY STREET
NEW YORK, NY 10045

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

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

The major factors supporting the satisfactory performance rating for Tioga State Bank (“Tioga”) with regard to the Community Reinvestment Act (“CRA”) include the following:

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

SCOPE OF EXAMINATION

Procedures

Tioga’s performance was evaluated using the Federal Financial Institutions Examination Council’s (“FFIEC”) Interagency Intermediate Small Institution Examination Procedures. Home purchase, refinance, and home improvement loans reported under the Home Mortgage Disclosure Act (“HMDA”) and a sample of small business and consumer loans originated from January 1, 2015 through December 31, 2017 were analyzed.

Tioga maintained three assessment areas. Metropolitan Statistical Area (“MSA”) 13780 (Binghamton, NY), consisting of all of Tioga County and a portion of Broome County, was evaluated using a full-scope review. MSA 21300 (Elmira, NY), consisting of a portion of Chemung County, and MSA 27060 (Ithaca, NY), consisting of a portion of Tompkins County, were evaluated using a limited-scope review. The full scope assessment area was identified based on the significance of the bank’s lending and deposit activities within that geographic area as compared to the other assessment areas. MSA 13780 (Binghamton, NY) held 87.3% of bank’s

deposits and 85.7% of the combined HMDA, small business and consumer loans. The two limited scope assessment areas did not have a substantial effect on the overall rating due to the relatively low level of lending activity and percentage of overall deposits in those assessment areas. For details, see the Summary of Key Assessment Area Data.

As shown in the table below, the lending test evaluation covered the period from January 1, 2015 to December 31, 2017. The evaluation period for Tioga’s community development activities was from April 1, 2015 through March 31, 2018.

PERFORMANCE CRITERIA	EVALUATION PERIOD
Loan-to-Deposit Ratio	January 1, 2015 – December 31, 2017
Lending in Assessment Areas	January 1, 2015 – December 31, 2017
Geographic Distribution of Loans	January 1, 2015 – December 31, 2017
Borrower Distribution of Loans	January 1, 2015 – December 31, 2017
Response to CRA Complaints	January 1, 2015 – December 31, 2017
Community Development Lending	April 1, 2015 – March 31, 2018
Qualified Investments	April 1, 2015 – March 31, 2018
Community Development Services	April 1, 2015 – March 31, 2018

Products

Retail loan products evaluated included home purchase, refinance, and home improvement loans reported under HMDA. In addition, a sample of 111 small business loans and 170 closed-end consumer loans originated in 2015, 2016, and 2017 were selected. The loan samples were selected using the Board of Governors’ sampling procedures. Examiners verified the integrity of the bank’s 2015, 2016 and 2017 HMDA loans, and the sample of small business loans and consumer loan data as part of the onsite evaluation. Multifamily loans were excluded from the analysis as the volume was too insignificant for analysis. Examiners also reviewed community development loans, qualified investments, and community development services.

Lending Distribution Analysis

The geographic and borrower loan distribution analyses were based on loan activity conducted in Tioga’s assessment areas. To analyze the borrower characteristics of HMDA-related and consumer loans, the proportion of originations to low- and moderate-income (“LMI”) borrowers was compared with the proportion of LMI families for HMDA loans and the proportion of LMI households for consumer loans. Income estimates from U.S. Department of Housing and Urban Development (“HUD”) and the FFIEC were used to categorize borrower income. For small business loans, the proportion of loans to borrowers with gross annual revenues (“GAR”) of \$1 million or less were compared with the proportion of such businesses as reported by Dun and Bradstreet (“D&B”). The size of the small business loan was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

For evaluation of the geographic distribution of loans, performance was rated based on penetration in LMI areas. Demographic data from the U.S. Department of Commerce's 2010 Census ("2010 Census") and 2015 American Community Survey ("2015 ACS") was used to categorize LMI areas. The proportion of HMDA-related loan originations in LMI geographies were compared with the proportion of owner-occupied units located in LMI geographies in the assessment area. For small business loans, the analysis compared the proportion of loan originations with the proportion of businesses located in LMI areas as reported by D&B. For consumer loans, the proportion of originations in LMI geographies was compared to the proportion of households located in LMI geographies in the assessment areas.

Tioga's HMDA-related and small business lending performance in 2017 was also compared to the 2017 performance of the aggregate of all lenders in the assessment area subject to HMDA and/or CRA small business loan reporting. Aggregate data for consumer lending was not available for analysis. Lending performance in 2013 and 2014 was evaluated for comparison to 2015 performance.

Peer data was used for the loan-to-deposit analysis. Local peer banks were selected based on the amount of deposits and number of branches in order to choose banks similarly-sized to Tioga within their assessment areas. Tioga's loan-to-deposit ratio was also compared to its national peer group. Tioga's performance in making community development loans and qualified investments was also compared with peer banks in Tioga's assessment areas.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews with five non-profit organizations. Two organizations' anti-poverty missions included promoting affordable housing and two other entities' missions were to provide a variety of social services in the assessment area. Examiners also visited a municipal community development agency. Details from these interviews are presented within the performance context of the respective assessment areas in this evaluation.

DESCRIPTION OF INSTITUTION

Tioga is a retail commercial bank wholly owned by a one-bank holding company, TSB Services, Inc. Founded in 1864, Tioga offers a variety of consumer and commercial loan products and deposit products. Loan products include consumer loans, commercial loans, and residential mortgages. Deposit products include checking, savings, and money market accounts.

Headquartered in Spencer, New York, Tioga operates eleven full-service branches, five of which are located in Tioga County, four in Broome County, one in Chemung County, and one in Tompkins County. Tioga operates in a competitive market with branches of numerous local and regional banks. Bank competitors in their market area included Chemung Canal Trust Company, Manufacturers and Traders Trust Company, KeyBank National Association, NBT Bank,

National Association and Tompkins Trust Company. Based on the deposits reported to the Federal Deposit Insurance Corporation (“FDIC”) on June 30, 2017, Tioga had the third largest deposit market share (10.6%) in the Binghamton MSA, the assessment area where the bank conducts a majority of its business.

As of December 31, 2017, Tioga maintained total assets of \$471.2 million, total loans and leases of \$271.7 million, and total domestic deposits of \$366.1 million. Of the total gross loans and leases, 44.7% were secured by one- to four-family residential real estate. A table that summarizes the bank’s loan portfolio according to the Consolidated Report of Condition and Income appears on the following page.

COMPOSITION OF LOAN PORTFOLIO		
Loan Type	12/31/2017	
	\$(000s)	Percent
Construction and Development	14,034	5.2
Secured by One to Four Family Dwellings	121,413	44.7
Other Real Estate - Multifamily	41,991	15.5
Other Real Estate - Nonfarm nonresidential	30,694	11.3
Commercial and Industrial	46,083	17.0
Loans to Individuals	8,898	3.3
All Other	8,550	3.1
Total	271,663	100.0

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

Tioga’s previous CRA evaluation was conducted as of May 4, 2015, using the FFIEC Interagency Intermediate Small Institution Examination Procedures. The prior evaluation resulted in an overall rating of Satisfactory. There were no financial or legal factors to prevent Tioga from fulfilling its responsibility under CRA.

DESCRIPTION OF ASSESSMENT AREAS

Tioga maintained three assessment areas located in central and southern New York State within three contiguous MSAs. The assessment areas consisted of the following:

Full Scope Assessment Area

- MSA 13780 (Binghamton, NY), consisting of Tioga County and a portion of Broome County.

Limited Scope Assessment Areas

- MSA 21300 (Elmira, NY), consisting of a portion of Chemung County.
- MSA 27060 (Ithaca, NY), consisting of a portion of Tompkins County.

Tioga's assessment area delineation did not change from the previous CRA evaluation. Based on the 2015 ACS, Tioga's assessment areas included 63 census tracts, of which 7 were low-income, 11 were moderate-income, 31 were middle-income, and 14 were upper-income.

Tioga's assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB and did not arbitrarily exclude LMI geographies. A map illustrating the bank's assessment areas is in Appendix B.

Summary of Key Assessment Area Data				
	MSA 13780 (Binghamton, NY)	MSA 21300 (Elmira, NY)	MSA 27060 (Ithaca, NY)	Totals
Total Population ⁴	224,605	7,484	16,583	248,672
Population % of AA population ⁽⁶⁾	90.3%	3.0%	6.7%	100.0%
Families	54,129	2,110	4,418	60,657
Families % of AA families ⁽⁶⁾	89.2%	3.5%	7.3%	100.0%
Total Census Tracts ⁴	58	2	3	63
Tracts % AA tracts	92.1%	3.2%	4.8%	100.0%
LMI tracts	17	0	1	18
LMI tracts % all AA LMI tracts	94.4%	0.0%	5.6%	100.0%
Total Owner-Occupied Units ⁴	60,064	2,674	5,234	67,972
Units % of AA units ⁽⁶⁾	88.4%	3.9%	7.7%	100.0%
Business Establishments ⁵	6,825	161	481	7,467
Bus. est. % AA bus. est.	91.4%	2.2%	6.4%	100.0%
Number of Branches ¹	9	1	1	11
Branches % all branches	81.8%	9.1%	9.1%	100.0%
Branches in LMI tracts	1	0	1	2
LMI branches % AA LMI branches	50.0%	0.0%	50.0%	100.0%
Branch Deposits (\$'000s) ²	331,803	5,767	42,618	380,188
Deposits % AA deposits	87.3%	1.5%	11.2%	100.0%
Deposit Market Share (%) / Rank in Mkt.	10.6/3	0.6/6	2.1/8	
Home Purchase Originations ³	270	9	28	307
HP originations % AA orig. ⁽⁶⁾	87.9%	2.9%	9.1%	100.0%
Refinance Originations ³	144	10	11	165
Refi orig. % AA orig. ⁽⁶⁾	87.3%	6.1%	6.7%	100.0%
Home Improvement Originations ³	268	18	28	314
Home Improvement orig. % AA orig. ⁽⁶⁾	85.4%	5.7%	8.9%	100.0%
Small Business Originations ³	75	5	7	87
SB orig. % AA orig. ⁽⁶⁾	86.2%	5.7%	8.0%	100.0%
Consumer Loan Originations	117	7	23	147
Consumer orig. % AA orig. ⁽⁶⁾	79.6%	4.8%	15.6%	100.0%
Combined Loan Totals	874	49	97	1,020
% of AA Orig. ⁽⁶⁾	85.7%	4.8%	9.5%	100.0%

(1) Branch numbers are as of 12/31/2017. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/17. (3) Originations are loans reported under HMDA and samples of small business and consumer loans for 2015 through 2017. (4) Demographic information was obtained from the 2010 Census and 2015 ACS. (5) Business establishments information was reported by D&B for 2017. (6) Due to rounding, total percentages may not equal 100%.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Tioga’s record of meeting the credit needs of its assessment areas through its lending performance is rated Satisfactory. Tioga’s loan-to-deposit ratio was reasonable and a substantial majority of its loans were originated within its assessment areas. The geographic distribution of loans also reflected reasonable penetration among geographies of different income levels throughout the bank’s assessment areas. The overall distribution of loans to borrowers of different income levels and businesses of different sizes was also reasonable.

Loan-to-Deposit Ratio

Tioga’s loan-to-deposit ratio was reasonable given the bank’s size, financial condition, and the credit needs of its assessment area. Tioga’s average loan-to-deposit ratio for the 12 quarters between January 1, 2015 and December 31, 2017 was 77.6%, based on information contained in its Consolidated Report of Condition and Income. This ratio was below the national peer average of 80.6% and above an average of 69.9% for five similarly-situated banks with branches located in Tioga’s assessment areas during the evaluation period. Tioga’s average loan-to-deposit ratio decreased from the prior CRA evaluation period when the bank had an average loan-to-deposit ratio of 81.0%.

Lending in Assessment Areas

Tioga originated a substantial majority of its loans, 82.1% by number and 75.1% by dollar amount, in its assessment areas over the evaluation period from January 1, 2015 through December 31, 2017. This was a decrease from 84.7% by number 83.5% by dollar amount at the previous evaluation. Tioga originated 81.8% of its HMDA-related loans, 86.5% of its consumer loans, and 78.2% of its small business loans by number within its assessment areas over the same period. See the Lending Inside and Outside the Assessment Area table for further details of the bank’s lending.

Lending Inside and Outside the Assessment Area								
1/1/2015 -12/31/2017								
Loan Type	Inside				Outside			
	#	%	\$ ('000s)	%	#	%	\$ ('000s)	%
Home Purchase	307	78.3	33,630	71.5	85	21.7	13,433	28.5
Refinancing	165	82.5	20,118	80.8	35	17.5	4,788	19.2
Home Improvement	314	85.1	13,089	81.1	55	14.9	3,060	18.9
Multifamily Housing	25	83.3	11,007	83.5	5	16.7	2,168	16.5
Total HMDA Related	811	81.8	77,844	76.9	180	18.2	23,449	23.1
Consumer	147	86.5	1,492	85.4	23	13.5	255	14.6
Small Business	87	78.2	8,257	60.5	24	21.8	5,383	39.5
All Loans	1,045	82.1	87,593	75.1	227	17.9	29,087	24.9

Geographic Distribution of Loans

Tioga's overall geographic distribution of loans was reasonable overall based primarily on reasonable penetration of geographies of different income levels in MSA 13780 (Binghamton, NY).

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

Tioga's overall lending distribution among borrowers of different incomes (including LMI individuals) and businesses of different sizes was reasonable based primarily on reasonable performance in MSA 13780 (Binghamton, NY).

Response to Complaints

Tioga received no complaints relating to the bank's CRA performance. Since the previous evaluation, there were no CRA-related complaints filed with the Federal Reserve Bank of New York.

COMMUNITY DEVELOPMENT TEST

Tioga's performance under the community development test was Outstanding. Tioga demonstrated excellent responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas. Compared to similarly situated peer institutions Tioga's volume of CD loans and qualified investments remained outstanding.

During the evaluation period, Tioga's community development loans and qualified investments totaled \$9.8 million, of which nearly 100% were made within Tioga's assessment areas. All qualified investments were newly made since the prior evaluation. Community development loan and qualified investment volume decreased from the \$13.4 million reported at the last evaluation. On an annualized basis, community development loans and qualified investments have decreased 20.5%. Even though there was a reduction in community development activity, the evaluation considered Tioga's capacity, the need and availability of opportunities for community development in the assessment area, and the performance of local competitors and their responsiveness to community development needs. Tioga was a leader in community development activities among peer institutions. See details in the community development loans and qualified investments tables on the next page.

Summary of Community Development Loans and Qualified Investments Inside and Outside Assessment Area April 1, 2015 - March 31, 2018						
Geography	Loans		Qualified Investments		TOTAL	
	(\$000)	%	(\$000)	%	(\$000)	%
MSA 13780 (Binghamton, NY)	\$6,263	87.0%	\$2,460	93.0%	\$8,723	88.6%
MSA 27060 (Ithaca, NY)	\$236	3.3%	\$10	0.4%	\$246	2.5%
MSA 21300 (Elmira, NY)	\$700	9.7%	\$176	6.6%	\$876	8.9%
Broader Statewide/Regional Area Including AA	\$0	0.0%	\$1	0.0%	\$1	0.0%
TOTAL	\$7,199	100.0%	\$2,647	100.0%	\$9,846	100.0%

Activity includes new loans and investments made during the examination period as well as investments with existing balances from the prior examination period that were outstanding as of 3/31/2017.

Tioga’s community development program was responsive to community needs overall as identified by community contacts, which stated that affordable housing and economic development were critical needs throughout Tioga’s assessment areas. In terms of dollar amount, affordable housing represented the majority of total activity at 39.1%, while revitalization and stabilization represented 31.0%, and economic development represented 20.3% of total activity. The following chart details Tioga’s community development loans and qualified investments by designation.

Summary of Community Development Loans and Qualified Investments By Primary Purpose Designation April 1, 2015 - March 31, 2018						
Designation	Loans		Qualified Investments		TOTAL	
	(\$000)	%	(\$000)	%	(\$000)	%
Affordable Housing	\$3,831	53.2%	\$23	0.9%	\$3,854	39.1%
Community Services	\$0	0.0%	\$942	35.6%	\$942	9.6%
Economic Development	\$1,994	27.7%	\$8	0.3%	\$2,002	20.3%
Revitalize and Stabilize	\$1,374	19.1%	\$1,674	63.2%	\$3,048	31.0%
TOTAL	\$7,199	100.0%	\$2,647	100%	\$9,846	100.0%

Activity includes new loans and investments made during the examination period as well as investments with existing balances from the prior examination period that were outstanding as of 3/31/2017.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

**METROPOLITAN AREA
MSA 13780 (Binghamton, NY)**

Full Review

DESCRIPTION OF OPERATIONS IN MSA 13780 (Binghamton, NY)

Tioga's banking activities within its assessment areas were primarily conducted within the MSA 13780 (Binghamton, NY) assessment area, which is composed of all of Tioga County and a portion of Broome County. As of December 31, 2017, Tioga operated 9 of its 11 branches (81.8%) in this MSA. As of June 30, 2017, these branches generated \$332 million in deposits, which accounted for 87.3% of the bank's total branch deposits. Of the bank's 786 HMDA-related loans originated in the assessment areas during the evaluation period, 86.7% were originated in the MSA 13780 (Binghamton, NY) assessment area. Of the sample of 87 small business loans originated in the assessment areas, 86.2% were originated in the MSA 13780 (Binghamton, NY) assessment area. Of the sample of 147 consumer loans originated in the assessment areas, 79.6% were originated in this assessment area. For additional assessment area data, see the Summary of Key Assessment Area Data table.

Tioga's market area is competitive with branches of local and regional banks operating in the assessment area. With a deposit market share of 10.6%, Tioga was the 3th largest depository institution in the MSA. Primary bank competitors in this assessment area included Chemung Canal Trust Company, Manufacturers and Traders Trust Company, KeyBank National Association, NBT Bank, National Association, Community Bank, National Association and Citizens Bank, National Association.

PERFORMANCE CONTEXT

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

Demographic Characteristics

The MSA 13780 (Binghamton, NY) assessment area consists of all of Tioga County and a portion of Broome County. According to the 2015 ACS, the MSA 13780 (Binghamton, NY) assessment area had 58 census tracts, of which seven, or 12.1%, were low-income and ten, or 17.2%, were moderate-income. In 2015 and 2016, according to the 2010 Census, five census tracts, or 8.6%, were classified as low-income and 12 census tracts, or 20.7%, were classified as moderate-income. All of the LMI census tracts were located in Broome County.

According to the 2015 ACS, the population of the MSA 13780 (Binghamton, NY) assessment area was 224,605, which accounted for 90.3% of the population of the combined assessment areas. The city of Binghamton, located within Broome County, was the largest city in the MSA with a population of 45,179, or 20.1% of the assessment area’s population. Approximately 21.2% of the MSA 13780 (Binghamton, NY) population resided in LMI geographies.

Income Characteristics

According to 2015 ACS data, the MSA 13780 (Binghamton, NY) assessment area had 54,129 families, of which 11,674 (21.6%) were low-income, 9,175 (17.0%) were moderate-income, and 10.3% lived below the poverty level. As shown in the table, the FFIEC median family income for MSA 13780 (Binghamton, NY) was \$65,700 in 2017, \$63,900 in 2016, and \$66,400 in 2015. These income levels were low in comparison to New York State’s FFIEC-adjusted median family incomes for the respective years.

FFIEC MEDIAN FAMILY INCOMES			
Area	2017	2016	2015
MSA 13780	\$65,700	\$63,900	\$66,400
New York State	\$73,400	\$72,300	\$72,000

Housing Characteristics

MSA 13780 (Binghamton, NY) assessment area had 100,963 housing units, of which 59.5%, or 60,064, were owner-occupied according to the 2015 ACS. Of the owner-occupied housing units, 3.0% were in low-income census tracts and 10.5% were in moderate-income census tracts. The remaining housing in this assessment area consisted of rental housing (29.6%) and vacant properties (10.9%). The 2015 ACS data estimated that the median age of the housing stock in this assessment area is 61 years, which is higher than New York State’s median age of 59 years.

Housing in the assessment area was generally affordable, although according to community contacts, affordable housing remained a pressing need. According to the NYSAR, the median sales price of an existing single-family home in MSA 13780 (Binghamton, NY) was \$109,600 in 2017, approximately three to four times the MFI of a low-income borrower and twice the MFI of a moderate-income borrower. In comparison, the median sales price for a single family home in New York State was \$250,000 in 2017. Rents were also relatively affordable in the assessment area. The 2015 ACS valued median gross rent for the assessment area as \$696, which was lower compared to the median gross rent of \$1,132 for New York State.

MEDIAN HOUSING SALES PRICE			
Area	2017	2016	2015
MSA 13780	\$109,600	\$108,400	\$113,000
New York State	\$250,000	\$236,870	\$230,000
Source: NYSAR			

Labor, Employment and Economic Characteristics

Long term economic trends in MSA 13780 (Binghamton, NY) indicated an increase in employment in the education, health care and services industries. However, community contacts noted that many of the service jobs were low paying. The unemployment rates in the MSA showed a generally improving trend. The average annual unemployment rates for the assessment area declined from 5.9% in 2015 to 5.5% in 2017. Unemployment rates for the MSA remained higher than the rates for the State of New York.

U.S. DEPARTMENT OF LABOR ANNUAL UNEMPLOYMENT RATES			
Area	2015	2016	2017
MSA 13780	5.9%	5.4%	5.5%
New York State	5.3%	4.8%	4.7%

According to the New York State Department of Labor’s September 2017 newsletter, *Employment in New York State*, the Southern Tier regional economy continued to grow. For the eight-year period ending July 2017, private sector job growth had increased 2.3%, contributing to the decline in unemployment for the region from 8.1% in 2009 to 5.2% in 2017.

According to D&B data, the MSA 13780 (Binghamton, NY) assessment area had a total of 6,825 businesses in 2017, of which 88.5% were small businesses with GAR of \$1 million or less. Of the total businesses, 10.0% were located in low-income areas and 13.1% were located in moderate-income areas. Principle industries in the assessment area included: services (except public administration); professional, scientific, and technical services; administration, support, waste and removal services; and retail trade.

Community Contacts

In order to learn more about community credit needs, examiners conducted two community contacts with non-profit organizations in the assessment area. One interview was with a non-profit human service agency. The entity’s representative stated that local economic conditions were starting to improve. There had been some expansion of manufacturing and hospitality in the assessment area. However, economic development, revitalization and affordable housing were continuing needs. Economic development was needed to create local job opportunities, the representative stated. Public transportation was limited, with taxi fares a significant expense for low and moderate income individuals. Safe affordable housing was also needed. While there was considerable housing available for seniors, the contact noted there was not enough housing for LMI families. Revitalization was needed as well, since the 2011 flood gave rise to abandoned properties within the area.

Despite some evidence of improvement, a representative of another non-profit organization that supported the homeless, disadvantaged and working poor felt the economy was not improving. The contact reported that she saw evidence that the working poor employed in service industries were struggling as the organization was seeing more people in its outreach programs and utilizing their food pantries. Additional assessment area information can be found in the Assessment Area Demographics table on the following page.

Assessment Area Demographics									
Assessment Area: MSA 13780									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	7	12.1	3,040	5.6	1,105	36.3	11,674	21.6	
Moderate-income	10	17.2	6,860	12.7	1,565	22.8	9,175	17	
Middle-income	27	46.6	28,306	52.3	2,481	8.8	11,576	21.4	
Upper-income	14	24.1	15,923	29.4	444	2.8	21,704	40.1	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	58	100.0	54,129	100.0	5,595	10.3	54,129	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	8,192	1,792	3	21.9	4,562	55.7	1,838	22.4	
Moderate-income	16,318	6,289	10.5	38.5	7,802	47.8	2,227	13.6	
Middle-income	51,500	33,129	55.2	64.3	13,142	25.5	5,229	10.2	
Upper-income	24,953	18,854	31.4	75.6	4,345	17.4	1,754	7	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	100,963	60,064	100.0	59.5	29,851	29.6	11,048	10.9	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	680	10	581	9.6	90	13	9	10.1	
Moderate-income	891	13.1	772	12.8	115	16.6	4	4.5	
Middle-income	3,794	55.6	3,330	55.1	404	58.3	60	67.4	
Upper-income	1,460	21.4	1,360	22.5	84	12.1	16	18	
Unknown-income	0	0	0	0	0	0	0	0	
Total Assessment Area	6,825	100.0	6,043	100.0	693	100.0	89	100.0	
Percentage of Total Businesses:				88.5		10.2		1.3	

Based on 2017 FFIEC Census Data and 2017 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Lending performance in MSA 13780 (Binghamton, NY) was considered reasonable based on a reasonable geographic distribution of lending and reasonable penetration among individuals of different income levels and businesses of different sizes. The greatest weight, based on number and volume, was given to HMDA-related lending followed by small business and consumer lending. In addition, Tioga's lending performance was compared to the 2017 aggregate of all lenders required to report HMDA and small business data within the assessment area. Performance in 2015 and 2016 was compared to aggregate data for 2015 and 2016 respectively. See the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of Tioga's 2017, 2016 and 2015 geographic distribution of lending and loan distribution by borrower income and business revenue size.

Geographic Distribution of Loans

Tioga's overall geographic distribution of loans reflected reasonable dispersion throughout the entire assessment area, including LMI census tracts. Tioga penetrated 91.4% of the census tracts with a reported income in the assessment area in 2017, indicating no conspicuous gaps in lending. In 2016, Tioga penetrated 87.9% of the census tracts in the assessment area and in 2015 96.6%.

Tioga penetration in low-income census tracts was lower than that in other income designations. However, performance context information indicated that there were challenges in making loans in low-income census tracts due to lower owner occupancy levels and increased poverty levels. According to the 2015 ACS, 3.0% of the owner-occupied housing units and 7.1% of the households in the MSA 13780 (Binghamton, NY) assessment area were located in low-income census tracts. According to the 2015 ACS, 36.3% of all families living in low-income census tracts had incomes below the poverty level, further limiting lending opportunities. Lending challenges were confirmed by the performance of the market aggregate, which in 2017 made only 80, or 2.2%, of its HMDA-related loans in low-income census tracts. Aggregate performance in 2016 and 2015 were comparable. While Tioga made 4.8% of its HMDA-related loans in low-income census tracts in 2017, the bank's performance in these geographies was similar to the aggregate in 2016 and 2015. The table on the following page provides details on Tioga's penetration by census tract income levels.

MSA 13780 (Binghamton, NY)			
Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
2017			
Low	7	1	85.7%
Moderate	10	1	90.0%
Middle	27	2	92.6%
Upper	14	1	92.9%
Total Tracts	58	5	91.4%
2016			
Low	5	2	60.0%
Moderate	12	1	91.7%
Middle	25	1	96.0%
Upper	16	3	81.3%
Total Tracts	58	7	87.9%
2015			
Low	5	1	80.0%
Moderate	12	2	83.3%
Middle	25	0	100.0%
Upper	16	1	93.8%
Total Tracts	58	2	96.6%

Home Purchase Loans

Tioga’s overall home purchase lending distribution was considered reasonable in light of demographic and performance context challenges, particularly related to the availability of owner-occupied housing in low-income census tracts in the assessment area.

Tioga’s home purchase lending performance in low-income census tracts was reasonable when compared to demographics and the market aggregate. The bank originated 2.1% of its home purchase loans in low-income census tracts by number and 6.0% by dollar volume. According to the 2015 ACS, 3.0% of owner-occupied housing units were located in low-income census tracts. This performance context consideration was confirmed by the performance of the market aggregate, which in 2017, made 1.9% by number and 1.4% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts in 2015 trailed the performance in 2017, while 2016 performance was comparable.

Tioga’s home purchase lending performance in moderate-income census tracts was also reasonable when compared to demographics and the market aggregate. The bank originated 8.4% of its home purchase loans in moderate-income census tracts by number and 6.9% by dollar compared to the demographic of the 2015 ACS, which indicated that 10.5% of owner-occupied housing units were located in moderate-income census tracts. Tioga’s performance in

moderate-income census tracts was below the market aggregate which made 10.7% of its home purchase loans in moderate-income census tracts by number and 6.9% by dollar in 2017. Home purchase lending performance in moderate-income census tracts in 2015 and 2016 was below the performance in 2017.

Refinance Loans

Tioga's overall refinance lending distribution was considered reasonable given its performance in LMI census tracts with consideration given to the demographic and performance context challenges, particularly related to the availability of owner-occupied housing in low-income census tracts in the assessment area.

Tioga's refinance lending performance in low-income geographies was considered reasonable based on the performance context factors that indicated limited opportunities. Under the 2015 ACS, 3.0% of owner-occupied housing units were in low-income census tracts. Tioga made 5.3% of refinance loans by number and 3.5% by dollar volume in low-income census tracts. The market aggregate made only 2.3% by number and 1.4% by dollar volume of its refinance loans in low-income census tracts in 2017. However, Tioga's 2016 refinance lending performance in low-income census tracts was below its 2017 performance. Additionally, in 2015, Tioga made no refinance loans in low-income census tracts.

Tioga's refinance lending performance in moderate-income census tracts was also considered reasonable. In 2017, Tioga originated 5.3% of its refinance loans in moderate-income census tracts by number and 6.7% by dollar volume compared to the demographic where 10.5% of owner-occupied housing units were located in moderate-income census tracts in this MSA. In number, Tioga's performance trailed the market aggregate, which originated 10.0% of its refinance loans in moderate-income census tracts by number although only 6.2% by dollar amount. Tioga's 2016 and 2015 refinance lending performance was comparable.

Home Improvement Loans

Tioga's overall home improvement lending performance in LMI geographies was considered reasonable based on excellent performance in low-income geographies and reasonable performance in moderate-income geographies.

Tioga's home improvement lending performance in low-income geographies was excellent when considering performance context factors that made HMDA-related lending difficult in low-income geographies. Under the 2015 ACS, 3.0% of owner-occupied housing units were in low-income census tracts. In 2017, Tioga made 3.4% of its home improvement loans in low-income census tracts by number and 0.6% by dollar volume. Tioga's performance was above the market aggregate in number, which made 1.6% of its home improvement loans by number but 0.8% by dollar amount in low-income census tracts in 2017. Tioga's performance in 2016 also exceeded demographics and the market aggregate, but performance in 2015 was below demographics and similar to the market aggregate.

Tioga's home improvement lending performance in moderate-income census tracts was reasonable based on comparisons to demographics and the market aggregate. The bank originated 9.2% of its home improvement loans by number and 12.2% by dollar in moderate-income census tracts in 2017, while 10.5% of owner-occupied housing units were located in moderate-income census tracts. Tioga's performance was similar to the market aggregate, which originated 9.7% of its home improvement loans by number and 7.4% by dollar in moderate-income census tracts. The bank's 2016 and 2015 home improvement lending performance was below its performance in 2017.

Small Business Loans

Tioga's overall small business lending performance in LMI geographies was reasonable when compared to D&B business establishment data and the market aggregate. Small business performance in low-income census tracts was reasonable as Tioga made 11.5% of its small business loans in low-income census tracts by number and 10.0% by dollar volume in 2017, given that 10.0% of all businesses were located in low-income census tracts. Tioga's performance was above the market aggregate, which made 8.7% of its small business loans by number and 10.1% by dollar in low-income census tracts in 2017. Tioga's performance in 2016 and 2015 was below its 2017 performance.

Tioga's small business performance in moderate-income census tracts was poor as Tioga made no small business loans in moderate-income census tracts in 2017 compared to 13.1% of businesses located in moderate-income census tracts. Tioga's performance in moderate-income census tracts was below the market aggregate, which had 14.4% of its small business loans by number and 17.1% by dollar in moderate-income census tracts. In 2016, Tioga made two small business loans in moderate-income census tracts and one in 2015, which was below the market aggregate and demographic data.

Consumer Loans

Tioga's overall consumer lending performance in LMI geographies was poor. The bank's consumer lending performance in low-income census tracts was considered poor. Based on the sample, Tioga made a total of 44 consumer loans in this MSA in 2017 of which none were made in low-income census tracts. Based on the 2015 ACS, 7.1% of all households resided in low-income census tracts. Tioga made no consumer loans in low-income census tracts in 2016 and 2015.

Tioga's consumer lending performance in moderate-income census tracts was poor. Tioga originated three or 6.8% of its consumer loans by number and 9.2% by dollar in moderate-income census tracts. Based on the 2015 ACS, 15.7% of all households resided in moderate-income census tracts in this MSA. Tioga made no consumer loans in moderate-income census tracts in 2016 and 2015.

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

Lending performance in the assessment area showed reasonable penetration among all income levels, including LMI individuals and businesses of different sizes. While housing was generally more affordable to moderate-income borrowers in the MSA 13780 (Binghamton, NY) assessment area, housing costs were approximately three to four times the income of low-income borrowers. Based upon this performance context consideration, HMDA-related lending to moderate-income borrowers was weighted more for this analysis. Tioga's performance in lending to LMI borrowers and businesses of different sizes is summarized as follows.

Home Purchase Loans

Tioga's overall lending distribution of home purchase loans to LMI borrowers was reasonable based on poor distribution to low-income borrowers and excellent distribution to moderate-income borrowers.

Performance in home purchase lending to low-income borrowers was poor. In 2017, Tioga made none of its home purchase loans to low-income borrowers while 21.6% of the families in the MSA were low-income. Tioga's performance was below the market aggregate, which made 8.2% of its home purchase loans to low-income borrowers by number and 4.7% by dollar volume. Tioga's performance in 2016 and 2015 was better compared to 2017. Performance in 2016 was similar to the aggregate but below the aggregate in 2015 and below demographics both years.

Performance in home purchase lending to moderate-income borrowers was excellent as 29.5% of Tioga's home purchase loans by number and 23.7% by dollar volume were made to moderate-income borrowers while 17.0% of families in the MSA were moderate-income. Tioga's performance was above the market aggregate which made 21.6% of its home purchase loans by number and 16.9% by dollar volume to moderate-income borrowers in 2017. Tioga's 2016 and 2015 performance also exceeded demographics and in 2016 was similar to the market aggregate but below in 2015.

Refinance Loans

Tioga's overall distribution of refinance loans to LMI borrowers was reasonable based on comparisons to demographics and the market aggregate.

Tioga's distribution of refinance loans to low-income borrowers was reasonable as 13.2% of refinance loans were made to low-income borrowers by number and 4.6% by dollar volume while 21.6% of all families in the MSA were low-income. Tioga's performance was above the market aggregate, which made 9.5% of refinance loans to low-income borrowers by number and 5.4% by dollar volume. Tioga's performance in 2016 and 2015 was also below the demographic but was above the market aggregate.

Tioga's distribution of refinance loans to moderate-income borrowers was reasonable as 13.2% of refinance loans by number and 7.0% by dollar volume were made to moderate-income borrowers while 17.0% of all families in the MSA were moderate-income. Tioga's performance

was below the market aggregate by number and dollar volume as the market aggregate made 19.8% of its refinance loans to moderate-income borrowers by number and 14.3% by dollar volume. Tioga's 2016 performance was below demographics and the market aggregate, while its 2015 performance exceeded both.

Home Improvement Loans

Tioga's overall distribution of home improvement loans to LMI borrowers was excellent based on comparisons to demographics and the market aggregate.

Tioga's distribution to low-income borrowers was considered reasonable. In 2017, Tioga made 19.5% of its home improvement loans by number and 5.8% by dollar to low-income borrowers while 21.6% of the families in the MSA were low-income. Tioga's performance was above the market aggregate which made 15.9% of its home improvement loans to low-income borrowers by number and 7.2% by dollar volume. Tioga's 2016 and 2015 performance exceeded both demographics and market aggregate data.

Performance in lending to moderate-income borrowers was excellent as 27.6% of Tioga's home improvement loans were made to moderate-income borrowers by number and 10.1% by dollar, while 17.0% of families were moderate-income. Tioga's performance was similar to the market aggregate, which made 26.6% of its home improvement loans to moderate-income borrowers by number and 16.6% by dollar in 2017. Tioga's performance in 2015 and 2016 was similar to 2017 when compared to demographics and the market aggregate.

Small Business Loans

The overall level of lending to small businesses was reasonable. In 2017, Tioga made all of its small business loans to businesses with GAR of \$1 million or less while 88.5% of all businesses in the MSA had GAR of \$1 million or less. Tioga's lending performance was above the aggregate, which made only 45.3% of its loans by number and 31.6% by dollar volume to businesses with GAR of \$1 million or less.

During 2017, 61.5% by number and 20.1% by dollar volume of Tioga's loans to small businesses were in amounts of \$100,000 or less, with an average loan amount of \$121 thousand. Tioga's performance was below the aggregate which originated 92.8% of its loans by number and 32.4% by dollar volume in amounts of \$100,000 or less. However, the aggregate includes credit card lenders which typically have smaller loan amounts. Performance in 2016 and 2015 was comparable to that of 2017.

Consumer Loans

Tioga's overall distribution of consumer loans to LMI borrowers was excellent based on the distribution to both low- and moderate-income borrowers. Performance in lending to low-income borrowers was excellent. In the evaluation period, Tioga made 33.3% of its consumer loans by number and 25.0% by dollar volume to low-income borrowers while 26.2% of all households in the MSA 13780 (Binghamton, NY) assessment area were low-income.

Performance in lending to moderate-income borrowers for the evaluation period was also excellent as 24.8% of Tioga’s consumer loans by number and 19.8% by dollar were made to moderate-income borrowers compared to 15.2% of all households in the MSA that were moderate-income.

COMMUNITY DEVELOPMENT TEST

Tioga’s performance under the community development test in MSA 13780 (Binghamton, NY) is rated Outstanding. Tioga demonstrated overall excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services. This assessment also considered Tioga’s capacity, the need and availability of opportunities for community development in the assessment area, and the performance of local competitors and their responsiveness to community development needs. Tioga was a leader in community development activities among peer institutions in the MSA 13780 (Binghamton, NY) assessment area.

Summary of Community Development Loans and Qualified Investments MSA 13780 (Binghamton, NY) Assessment Area By Primary Purpose Designation April 1, 2015 - March 31, 2018						
Designation	Loans		Qualified Investments		TOTAL	
	(\$000)	%	(\$000)	%	(\$000)	%
Affordable Housing	\$3,131	50.0%	\$23	0.9%	\$3,154	36.2%
Community Services	\$0	0.0%	\$930	37.8%	\$930	10.7%
Economic Development	\$1,994	31.8%	\$7	0.3%	\$2,001	22.9%
Revitalize and Stabilize	\$1,138	18.2%	\$1,500	61.0%	\$2,638	30.2%
TOTAL	\$6,263	100.0%	\$2,460	100%	\$8,723	100.0%

Activity includes new loans and investments made during the examination period as well as investments with existing balances from the prior examination period that were outstanding as of 3/31/2017.

The bank’s overall community development loans and investment activity in MSA 13780 (Binghamton, NY) totaled \$8.7 million. Of Tioga’s overall community development loans and investments, 88.6% were made in the MSA 13780 (Binghamton, NY) assessment area. On an annualized basis, community development loans and investments declined 39.0% over the levels shown at the previous CRA evaluation. Even with the decline in activity, in comparison to similarly situated banks in the assessment area, Tioga was still substantially above peer institutions when considering annualized community development loans and qualified investments as a percentage of deposits within the MSA.

Community Development Loans

Community development loans in MSA 13780 (Binghamton, NY) assessment area totaled \$6.3 million. Community development lending was focused on the provision of affordable housing and was responsive to identified credit needs. Fifty percent of community development loan activity went toward affordable housing efforts while 31.8% went toward economic development and 18.2% went to revitalization and stabilization activities. Examples of community development loans include:

- A \$225,000 loan to an entity to provide thirteen units of affordable housing in a moderate-income census tract.
- An \$112,500 loan to revitalize a mixed-use property in a low-income census tract. This property will provide permanent employment for area residents.
- A \$60,000 loan to help revitalize a low-income geography. The proprietor will set up a small business entity and hire two associates to assist.

Community Development Investments

Community development investments activity in the MSA 13780 (Binghamton, NY) assessment area consisted of \$2.5 million in qualified investments, including \$131,000 in philanthropic grants and donations. The grants and donations were made primarily for community service activities. All community development investments were new from the prior evaluation and examples of qualified investments include:

- Purchase of a \$600,000 municipal bond to finance the replacement of a bridge for vehicular traffic. An LMI geography was serviced by this infrastructure.
- Purchase of a \$131,000 municipal bond to purchase a school bus. This bus serves a school district in which 63% of the student population qualified for the free or reduced price lunch program.

Community Development Services

Tioga provided eight financial seminars to organizations that furnished community development services to LMI individuals. Twenty-three bank employees served on the boards and committees of 28 community development organizations. Examples include:

- Three officers were board members and fundraising committee members for an organization with a mission of community care and development. The organization's activities that benefit LMI individuals included scholarships, mini-grant programs and fitness programs. Senior programs included meals-on-wheels, minor home repairs and provision of home health aids, such as wheelchairs and walkers.

- One officer was a board member of a non-profit organization that provided food and housing for homeless residents suffering from addiction in Tioga County, NY.
- One employee served as a member of the board of directors of a non-profit organization that promoted economic development within the greater Binghamton, NY area.

In terms of retail banking services, Tioga's overall branch distribution was accessible to the LMI population and geographies within the MSA 13780 (Binghamton, NY) assessment area. Within the assessment area, Tioga operated nine branches, one of which was in a low-income census tract. All branches provided a full range of financial services to the communities they served.

METROPOLITAN AREAS

MSA 21300 (Elmira, NY)

Limited Review

DESCRIPTION OF INSTITUTION’S OPERATION IN MSA 21300 (Elmira, NY)

A limited evaluation of Tioga’s performance in the MSA 21300 (Elmira, NY) assessment area was completed. According to the 2015 ACS, the MSA 21300 (Elmira, NY) assessment area had 3.0% of the population of Tioga’s assessment areas and according to 2017 D&B data, 2.2% of all business establishments. Key demographic highlights are listed below.

Assessment Area Demographics – MSA 21300 (Elmira, NY)				
Income Category	Tract Distribution		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	16.8
Moderate Income	0	0.0	0.0	23.5
Middle Income	2	100.0	100.0	21.1
Upper Income	0	0.0	0.0	38.6
Unknown	0	0.0	0.0	0.0
Total	2	100.0	100.0	100.0

During the evaluation period, Tioga operated one branch in this assessment area and lending activity represented 4.8% of the total lending in the assessment areas. Additional information can be found in the Summary of Key Assessment Area Data table.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 21300 (Elmira, NY)

Tioga’s performance in the MSA 21300 (Elmira, NY) assessment area was consistent with its overall satisfactory performance, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Community Development Test
MSA 21300 (Elmira, NY)	Consistent	Consistent

During the evaluation period, Tioga's performance under the lending test was consistent with the bank's reasonable performance related to borrower distribution. During the evaluation period, Tioga made 27.0% of its HMDA related loans to LMI borrowers, compared to 40.3% LMI families in the assessment area. However, Tioga made 100.0% of its small business loans to businesses with GAR of \$1 million or less and 57.1% of its consumer loans to LMI borrowers compared to 39.1% LMI households in the assessment area. Tioga's geographic distribution of loans was not evaluated since there were no LMI census tracts in the bank's MSA 21300 (Elmira, NY) assessment area. Refer to the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of the bank's 2017, 2016 and 2015 performance.

Performance under the community development test was consistent with Tioga's excellent performance, with nearly \$876 thousand in community development loans and investments in the MSA 21300 (Elmira, NY) assessment area. This represented a substantial increase from the prior evaluation period when an annualized \$50 thousand in community development loans and investments were made. Tioga was a leader among peers in the MSA 21300 (Elmira, NY) assessment area.

METROPOLITAN AREAS

MSA 27060 (Ithaca, NY)

Limited Review

DESCRIPTION OF INSTITUTION’S OPERATION IN MSA 27060 (Ithaca, NY)

A limited evaluation of Tioga’s performance in the MSA 27060 (Ithaca, NY) assessment area was completed. According to the 2015 ACS, the MSA 27060 (Ithaca, NY) assessment area had 6.7% of the population of Tioga’s assessment areas and according to 2017 D&B data, 6.4% of all business establishments. Key demographic highlights are listed below.

Assessment Area Demographics – MSA 27060 (Ithaca, NY)				
Income Category	Tract Distribution		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	24.9
Moderate Income	1	33.3	29.9	16.3
Middle Income	2	66.7	70.1	26.1
Upper Income	0	0.0	0.0	32.7
Unknown	0	0.0	0.0	0.0
Total	3	100.0	100.0	100.0

During the evaluation period, Tioga operated one branch in this assessment area, which was located in a moderate-income census tract. Lending activity represented 9.5% of the total lending in the assessment areas. Additional information can be found in the Summary of Key Assessment Area Data table.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 27060 (Ithaca, NY)

Tioga’s performance in the MSA 27060 (Ithaca, NY) assessment area was consistent with its overall, satisfactory performance, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Community Development Test
MSA 27060 (Ithaca, NY)	Exceeded	Below

During the evaluation period, Tioga’s performance under the lending test was exceeded the bank’s overall reasonable performance. Tioga’s geographic distribution of loans reflected excellent penetration throughout this assessment area, including LMI census geographies. Tioga

also demonstrated excellent penetration among individuals of all income levels (including LMI individuals), as well as businesses with GAR of \$1 million or less. Tioga's lending performance frequently exceeded demographic and market aggregate data. Refer to the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of the bank's 2017, 2016 and 2015 performance.

Community development test performance was below the bank's excellent performance, with \$246 thousand in community development loans and investments in the MSA 27060 (Ithaca, NY) assessment area. Tioga's performance trailed the prior evaluation period but was consistent with peers.

CRA APPENDIX A

2017 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 13780

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	2	2.1%	6.0%	1.9%	1.4%	0	0.0%	0.0%	8.2%	4.7%
Moderate	8	8.4%	6.9%	10.7%	6.9%	28	29.5%	23.7%	21.6%	16.9%
Middle	58	61.1%	59.0%	53.6%	53.2%	25	26.3%	22.9%	23.5%	22.5%
Upper	27	28.4%	28.1%	33.7%	38.5%	28	29.5%	37.9%	31.4%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	14.7%	15.6%	15.3%	13.2%
Total	95	100.0%	100.0%	100.0%	100.0%	95	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	2	5.3%	3.5%	2.3%	1.4%	5	13.2%	4.6%	9.5%	5.4%
Moderate	2	5.3%	6.7%	10.0%	6.2%	5	13.2%	7.0%	19.8%	14.3%
Middle	22	57.9%	67.6%	51.4%	50.7%	9	23.7%	12.6%	22.2%	20.1%
Upper	12	31.6%	22.2%	36.4%	41.7%	14	36.8%	35.5%	35.0%	44.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	13.2%	40.4%	13.4%	15.6%
Total	38	100.0%	100.0%	100.0%	100.0%	38	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	3	3.4%	0.6%	1.6%	0.8%	17	19.5%	5.8%	15.9%	7.2%
Moderate	8	9.2%	12.2%	9.7%	7.4%	24	27.6%	10.1%	26.6%	16.6%
Middle	54	62.1%	64.7%	55.3%	55.9%	20	23.0%	19.5%	24.0%	22.4%
Upper	22	25.3%	22.6%	33.3%	35.9%	19	21.8%	41.5%	30.0%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	8.0%	23.1%	3.5%	10.0%
Total	87	100.0%	100.0%	100.0%	100.0%	87	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	4	44.4%	17.3%	36.0%	32.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	11.1%	2.1%	4.0%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	33.3%	68.4%	40.0%	43.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	11.1%	12.3%	20.0%	22.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	100.0%	100.0%	100.0%	100.0%
Total	9	100.0%	100.0%	100.0%	100.0%	9	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	11	4.8%	6.4%	2.2%	2.2%	22	9.6%	2.0%	9.6%	4.9%
Moderate	19	8.3%	6.8%	10.4%	6.6%	57	24.9%	13.4%	21.8%	15.8%
Middle	137	59.8%	63.6%	53.2%	52.4%	54	23.6%	15.9%	23.1%	21.3%
Upper	62	27.1%	23.1%	34.2%	38.8%	61	26.6%	31.4%	31.9%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	35	15.3%	37.2%	13.6%	16.0%
Total	229	100.0%	100.0%	100.0%	100.0%	229	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	3	11.5%	10.0%	8.7%	10.1%					
Moderate	0	0.0%	0.0%	14.4%	17.1%					
Middle	12	46.2%	54.9%	54.0%	57.6%					
Upper	11	42.3%	35.1%	22.7%	15.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.1%	0.1%					
Total	26	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	26	100.0%	100.0%	45.3%	31.6%					
By Loan Size										
\$100,000 or less	16	61.5%	20.1%	92.8%	32.4%					
\$100,001-\$250,000	6	23.1%	28.0%	4.0%	18.0%					
\$250,001-\$1 Million	4	15.4%	51.9%	3.2%	49.5%					
Total	26	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 13780 - 2017

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	20	45.5%	156	35.8%
Moderate	3	6.8%	40	9.2%	9	20.5%	87	19.9%
Low/Moderate Total	3	6.8%	40	9.2%	29	65.9%	242	55.7%
Middle	31	70.5%	320	73.6%	11	25.0%	115	26.4%
Upper	10	22.7%	75	17.2%	4	9.1%	78	17.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	435	100.0%	44	100.0%	435	100.0%

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%	0.0%	0.0%	0	0.0%	0.0%	3.6%	2.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	22.9%	17.4%
Middle	4	100.0%	100.0%	100.0%	100.0%	2	50.0%	45.8%	27.7%	26.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.1%	24.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	54.2%	27.7%	29.0%
Total	4	100.0%	100.0%	100.0%	100.0%	4	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.9%	4.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	31.9%	13.2%	10.0%
Middle	5	100.0%	100.0%	100.0%	100.0%	1	20.0%	33.6%	21.1%	25.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	34.5%	44.7%	42.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.2%	18.0%
Total	5	100.0%	100.0%	100.0%	100.0%	5	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.3%	2.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	3.8%	26.5%	23.5%
Middle	6	100.0%	100.0%	100.0%	100.0%	2	33.3%	67.2%	24.5%	25.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	29.0%	34.7%	48.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	6	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%
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%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.6%	2.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	20.0%	11.3%	21.8%	16.2%
Middle	15	100.0%	100.0%	100.0%	100.0%	5	33.3%	47.5%	25.3%	26.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	33.3%	18.8%	28.8%	31.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	13.3%	22.4%	16.5%	23.4%
Total	15	100.0%	100.0%	100.0%	100.0%	15	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Moderate	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Middle	3	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
Upper	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total	3	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	
By Revenue										
\$1 Million or Less	3	100.0%	100.0%	100.0%	100.0%	48.0%	47.2%			
By Loan Size										
\$100,000 or less	2	66.7%	17.9%	100.0%	100.0%					
\$100,001-\$250,000	1	33.3%	82.1%	0.0%	0.0%					
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	0.0%					
Total	3	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 21300 - 2016

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Consumer Loans								
Low	0	0.0%	0	0.0%	1	50.0%	7	47.4%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	7	47.4%
Middle	2	100.0%	15	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	8	52.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	15	100.0%	2	100.0%	15	100.0%

2017 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 27060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	8.5%	10.3%	5.3%
Moderate	8	66.7%	63.8%	25.3%	19.1%	4	33.3%	35.5%	24.7%	18.1%
Middle	4	33.3%	36.2%	74.7%	80.9%	1	8.3%	8.4%	20.5%	21.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	41.7%	47.6%	32.9%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.6%	14.4%
Total	12	100.0%	100.0%	100.0%	100.0%	12	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.5%	7.9%
Moderate	0	0.0%	0.0%	30.6%	25.7%	0	0.0%	0.0%	23.6%	18.8%
Middle	0	0.0%	0.0%	69.4%	74.3%	0	0.0%	0.0%	25.0%	22.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	30.6%	42.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.3%	8.5%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	5.6%	20.7%	12.3%
Moderate	6	66.7%	37.7%	34.5%	24.7%	1	11.1%	2.8%	32.8%	17.2%
Middle	3	33.3%	62.3%	65.5%	75.3%	2	22.2%	4.3%	15.5%	10.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	33.3%	49.4%	27.6%	46.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	11.1%	37.9%	3.4%	14.2%
Total	9	100.0%	100.0%	100.0%	100.0%	9	100.0%	100.0%	100.0%	100.0%
	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%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	4	19.0%	7.8%	13.0%	6.3%
Moderate	14	66.7%	57.6%	28.6%	21.0%	5	23.8%	27.7%	26.1%	18.2%
Middle	7	33.3%	42.4%	71.4%	79.0%	3	14.3%	7.4%	20.7%	20.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	8	38.1%	48.0%	31.2%	41.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.8%	9.0%	9.1%	12.9%
Total	21	100.0%	100.0%	100.0%	100.0%	21	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS									
	By Tract Income									
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	0	0.0%	0.0%		0.0%	24.9%				
Middle	3	100.0%	100.0%		75.1%	77.0%				
Upper	0	0.0%	0.0%		0.0%	0.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		0.0%	0.0%				
Total	3	100.0%	100.0%		100.0%	100.0%				
	By Revenue									
\$1 Million or Less	3	100.0%	100.0%		58.7%	68.9%				
	By Loan Size									
\$100,000 or less	3	100.0%	100.0%		95.5%	56.5%				
\$100,001-\$250,000	0	0.0%	0.0%		3.5%	26.2%				
\$250,001-\$1 Million	0	0.0%	0.0%		1.0%	17.3%				
Total	3	100.0%	100.0%		100.0%	100.0%				

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 27060 - 2017

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	83.3%	65	91.5%	5	83.3%	61	85.8%
Low/Moderate Total	5	83.3%	65	91.5%	5	83.3%	61	85.8%
Middle	1	16.7%	6	8.5%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	16.7%	10	14.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	71	100.0%	6	100.0%	71	100.0%

2016 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 13780

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	2	2.3%	5.8%	2.2%	1.5%	7	8.0%	4.6%	7.6%	4.5%
Moderate	4	4.5%	2.8%	8.1%	5.2%	21	23.9%	18.4%	24.3%	19.2%
Middle	63	71.6%	66.7%	51.5%	48.4%	25	28.4%	27.3%	23.7%	23.1%
Upper	19	21.6%	24.7%	38.2%	44.9%	29	33.0%	44.3%	28.0%	38.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	6.8%	5.4%	16.4%	15.0%
Total	88	100.0%	100.0%	100.0%	100.0%	88	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	1	1.7%	2.6%	1.8%	1.2%	6	10.0%	3.9%	6.5%	3.3%
Moderate	3	5.0%	2.8%	8.1%	6.0%	5	8.3%	5.0%	17.2%	13.0%
Middle	50	83.3%	81.1%	51.5%	49.5%	25	41.7%	33.5%	23.9%	21.1%
Upper	6	10.0%	13.4%	38.7%	43.3%	19	31.7%	37.6%	34.8%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	8.3%	20.0%	17.7%	21.4%
Total	60	100.0%	100.0%	100.0%	100.0%	60	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	3	3.7%	30.5%	1.7%	7.3%	18	22.2%	3.3%	11.3%	4.7%
Moderate	3	3.7%	3.1%	7.7%	4.9%	20	24.7%	10.9%	22.6%	16.0%
Middle	60	74.1%	42.9%	61.7%	53.7%	20	24.7%	11.6%	27.8%	22.8%
Upper	15	18.5%	23.5%	28.8%	34.1%	17	21.0%	35.7%	35.7%	46.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	7.4%	38.5%	2.6%	9.6%
Total	81	100.0%	100.0%	100.0%	100.0%	81	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	1	11.1%	34.5%	26.9%	18.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	44.4%	27.5%	26.9%	26.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	44.4%	38.0%	30.8%	48.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	15.4%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	100.0%	100.0%	100.0%	100.0%
Total	9	100.0%	100.0%	100.0%	100.0%	9	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	7	2.9%	13.6%	2.2%	2.1%	31	13.0%	3.5%	7.8%	4.1%
Moderate	14	5.9%	6.1%	8.1%	5.9%	46	19.3%	10.5%	21.9%	16.7%
Middle	177	74.4%	62.5%	52.9%	49.0%	70	29.4%	22.4%	24.2%	22.0%
Upper	40	16.8%	17.9%	36.8%	43.0%	65	27.3%	34.7%	30.9%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	10.9%	28.8%	15.3%	18.5%
Total	238	100.0%	100.0%	100.0%	100.0%	238	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	1	4.0%	3.7%	9.4%	11.2%					
Moderate	2	8.0%	14.7%	14.7%	17.7%					
Middle	13	52.0%	64.4%	44.1%	39.7%					
Upper	9	36.0%	17.2%	31.7%	31.3%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.2%	0.1%					
Total	25	100.0%	100.0%	100.0%	100.0%		100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	25	100.0%	100.0%	43.7%	28.1%					
By Loan Size										
\$100,000 or less	20	80.0%	43.0%	91.4%	27.4%					
\$100,001-\$250,000	4	16.0%	27.3%	4.6%	17.3%					
\$250,001-\$1 Million	1	4.0%	29.7%	4.0%	55.3%					
Total	25	100.0%	100.0%	100.0%	100.0%		100.0%	100.0%	100.0%	100.0%

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 13780 - 2016

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	13	35.1%	97	24.7%
Moderate	0	0.0%	0	0.0%	9	24.3%	69	17.5%
Low/Moderate Total	0	0.0%	0	0.0%	22	59.5%	165	42.2%
Middle	27	73.0%	229	58.6%	8	21.6%	163	41.6%
Upper	10	27.0%	162	41.4%	7	18.9%	63	16.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	391	100.0%	37	100.0%	391	100.0%

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%	0.0%	0.0%	1	33.3%	24.8%	14.3%	6.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.1%	11.6%
Middle	3	100.0%	100.0%	100.0%	100.0%	1	33.3%	41.9%	21.4%	17.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	33.2%	31.4%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.7%	11.3%
Total	3	100.0%	100.0%	100.0%	100.0%	3	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.6%	7.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	23.4%	18.5%
Middle	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	17.0%	12.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	38.3%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.6%	15.5%
Total	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	8.1%	8.9%	1.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	22.2%	9.0%
Middle	4	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	22.2%	12.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	86.6%	40.0%	70.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	5.4%	6.7%	6.4%
Total	4	100.0%	100.0%	100.0%	100.0%	4	100.0%	100.0%	100.0%	100.0%
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%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	2	25.0%	17.5%	11.7%	6.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	20.4%	13.2%
Middle	8	100.0%	100.0%	100.0%	100.0%	2	25.0%	30.4%	20.4%	15.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	50.2%	35.8%	52.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	1.9%	11.7%	12.0%
Total	8	100.0%	100.0%	100.0%	100.0%	8	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	0	0.0%	0.0%		0.0%	0.0%				
Middle	2	100.0%	100.0%		100.0%	100.0%				
Upper	0	0.0%	0.0%		0.0%	0.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		0.0%	0.0%				
Total	2	100.0%	100.0%		100.0%	100.0%				
By Revenue										
\$1 Million or Less	2	100.0%	100.0%		46.4%	13.2%				
By Loan Size										
\$100,000 or less	2	100.0%	100.0%		92.9%	23.3%				
\$100,001-\$250,000	0	0.0%	0.0%		3.6%	14.3%				
\$250,001-\$1 Million	0	0.0%	0.0%		3.6%	62.4%				
Total	2	100.0%	100.0%		100.0%	100.0%				

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 21300 - 2016

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	1	33.3%	10	33.7%
Moderate	0	0.0%	0	0.0%	2	66.7%	20	66.7%
Low/Moderate Total	0	0.0%	0	0.0%	3	100.0%	30	0.0%
Middle	3	100.0%	30	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	30	100.0%	3	100.0%	30	100.0%

2016 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 27060

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%	0.0%	0.0%	1	10.0%	7.0%	20.7%	13.0%
Moderate	8	80.0%	68.7%	51.1%	44.4%	5	50.0%	28.3%	18.5%	15.6%
Middle	2	20.0%	31.3%	48.9%	55.6%	0	0.0%	0.0%	31.1%	36.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	40.0%	64.8%	20.7%	25.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.9%	9.0%
Total	10	100.0%	100.0%	100.0%	100.0%	10	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	2	33.3%	12.0%	8.2%	5.3%
Moderate	5	83.3%	86.0%	53.6%	47.1%	0	0.0%	0.0%	13.4%	11.1%
Middle	1	16.7%	14.0%	46.4%	52.9%	0	0.0%	0.0%	34.0%	29.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	66.7%	88.0%	37.1%	45.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.2%	9.6%
Total	6	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	3.5%	16.0%	7.4%
Moderate	8	88.9%	57.2%	62.7%	58.9%	3	33.3%	24.6%	20.0%	18.3%
Middle	1	11.1%	42.8%	37.3%	41.1%	0	0.0%	0.0%	29.3%	22.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	33.3%	70.6%	34.7%	51.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	11.1%	1.3%	0.0%	0.0%
Total	9	100.0%	100.0%	100.0%	100.0%	9	100.0%	100.0%	100.0%	100.0%
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%	59.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	40.8%	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%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	5	20.0%	8.3%	15.4%	8.3%
Moderate	21	84.0%	73.6%	54.7%	48.4%	8	32.0%	17.6%	17.0%	12.1%
Middle	4	16.0%	26.4%	45.3%	51.6%	0	0.0%	0.0%	31.2%	28.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	11	44.0%	73.9%	28.9%	29.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.0%	0.2%	7.4%	22.0%
Total	25	100.0%	100.0%	100.0%	100.0%	25	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
		Bank		Aggregate						
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	50.3%	45.4%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	49.7%	54.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	2	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	2	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	54.7%	54.4%
By Loan Size										
\$100,000 or less	2	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	98.1%	64.5%
\$100,001-\$250,000	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.2%	11.7%
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.6%	23.8%
Total	2	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 27060 - 2016

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	5	62.5%	25	46.6%
Moderate	8	100.0%	54	100.0%	2	25.0%	14	25.6%
Low/Moderate Total	8	100.0%	54	100.0%	7	87.5%	39	72.1%
Middle	0	0.0%	0	0.0%	1	12.5%	15	27.9%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	54	100.0%	8	100.0%	54	100.0%

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 13780

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	1	1.1%	1.0%	2.7%	1.7%	6	6.9%	3.6%	11.6%	7.1%
Moderate	5	5.7%	4.1%	7.9%	4.8%	16	18.4%	14.5%	23.8%	19.1%
Middle	58	66.7%	65.3%	48.5%	45.1%	22	25.3%	21.4%	22.9%	23.6%
Upper	23	26.4%	29.5%	40.9%	48.5%	33	37.9%	42.0%	26.1%	36.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	11.5%	18.6%	15.6%	13.9%
Total	87	100.0%	100.0%	100.0%	100.0%	87	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	1.6%	1.0%	4	8.7%	6.1%	7.9%	4.4%
Moderate	2	4.3%	2.6%	6.6%	4.4%	13	28.3%	22.9%	18.5%	12.9%
Middle	36	78.3%	77.7%	54.4%	52.3%	16	34.8%	35.2%	23.4%	20.4%
Upper	8	17.4%	19.6%	37.4%	42.3%	13	28.3%	35.8%	33.0%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.2%	18.8%
Total	46	100.0%	100.0%	100.0%	100.0%	46	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	2	2.0%	1.9%	3.0%	6.4%	31	31.0%	11.4%	18.3%	7.2%
Moderate	4	4.0%	4.0%	7.2%	5.2%	17	17.0%	16.9%	20.3%	16.6%
Middle	81	81.0%	78.1%	61.2%	48.7%	30	30.0%	24.0%	28.2%	22.2%
Upper	13	13.0%	16.1%	28.6%	39.8%	15	15.0%	27.5%	29.4%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	7.0%	20.2%	3.8%	10.5%
Total	100	100.0%	100.0%	100.0%	100.0%	100	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	2	28.6%	27.6%	10.3%	11.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	42.9%	13.6%	37.9%	21.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	41.4%	43.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	28.6%	58.8%	10.3%	23.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	100.0%	100.0%	100.0%	100.0%
Total	7	100.0%	100.0%	100.0%	100.0%	7	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	5	2.1%	5.7%	2.5%	1.9%	41	17.1%	4.6%	11.4%	6.1%
Moderate	14	5.8%	5.5%	7.7%	5.1%	46	19.2%	14.0%	21.5%	16.6%
Middle	175	72.9%	57.9%	52.0%	47.4%	68	28.3%	20.9%	23.7%	21.9%
Upper	46	19.2%	30.8%	37.8%	45.5%	61	25.4%	31.1%	28.4%	37.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	10.0%	29.4%	15.0%	17.6%
Total	240	100.0%	100.0%	100.0%	100.0%	240	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	2	8.3%	10.5%		9.7%	14.9%				
Moderate	1	4.2%	3.7%		16.3%	21.0%				
Middle	11	45.8%	33.3%		42.3%	37.9%				
Upper	10	41.7%	52.5%		31.3%	26.2%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		0.4%	0.1%				
Total	24	100.0%	100.0%		100.0%	100.0%				
By Revenue										
\$1 Million or Less	24	100.0%	100.0%		43.2%	31.2%				
By Loan Size										
\$100,000 or less	16	66.7%	29.4%		91.8%	27.1%				
\$100,001-\$250,000	6	25.0%	43.7%		3.7%	14.5%				
\$250,001-\$1 Million	2	8.3%	26.9%		4.5%	58.4%				
Total	24	100.0%	100.0%		100.0%	100.0%				

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 13780 - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	6	16.7%	58	13.8%
Moderate	0	0.0%	0	0.0%	11	30.6%	90	21.5%
Low/Moderate Total	0	0.0%	0	0.0%	17	47.2%	147	35.3%
Middle	30	83.3%	365	87.5%	11	30.6%	138	33.1%
Upper	6	16.7%	52	12.5%	8	22.2%	131	31.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	417	100.0%	36	100.0%	417	100.0%

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%	0.0%	0.0%	1	50.0%	31.4%	4.5%	2.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	32.8%	24.7%
Middle	2	100.0%	100.0%	100.0%	100.0%	1	50.0%	68.6%	23.9%	24.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	23.9%	34.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.9%	14.3%
<i>Total</i>	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	21.2%	11.1%	8.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	29.1%	22.2%	14.4%
Middle	4	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	35.6%	35.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	49.7%	31.1%	41.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<i>Total</i>	4	100.0%	100.0%	100.0%	100.0%	4	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	4.9%	10.5%	6.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	3.9%	26.3%	18.3%
Middle	8	100.0%	100.0%	100.0%	100.0%	5	62.5%	76.4%	22.8%	14.3%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	14.8%	35.1%	54.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.3%	6.8%
<i>Total</i>	8	100.0%	100.0%	100.0%	100.0%	8	100.0%	100.0%	100.0%	100.0%
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%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<i>Total</i>	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	3	21.4%	20.5%	8.3%	4.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	14.3%	12.9%	27.8%	20.9%
Middle	14	100.0%	100.0%	100.0%	100.0%	6	42.9%	42.6%	26.6%	26.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	21.4%	24.0%	29.6%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.7%	9.1%
<i>Total</i>	14	100.0%	100.0%	100.0%	100.0%	14	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0		0.0%		0.0%		0.0%		0.0%	
Moderate	0		0.0%		0.0%		0.0%		0.0%	
Middle	0		0.0%		0.0%		100.0%		100.0%	
Upper	0		0.0%		0.0%		0.0%		0.0%	
Unknown	0		0.0%		0.0%		0.0%		0.0%	
Tract Unknown	0		0.0%		0.0%		0.0%		0.0%	
<i>Total</i>	0		0.0%		0.0%		100.0%		100.0%	
By Revenue										
\$1 Million or Less	0		0.0%		0.0%		38.4%		30.6%	
By Loan Size										
\$100,000 or less	0		0.0%		0.0%		95.9%		61.7%	
\$100,001-\$250,000	0		0.0%		0.0%		4.1%		38.3%	
\$250,001-\$1 Million	0		0.0%		0.0%		0.0%		0.0%	
<i>Total</i>	0		0.0%		0.0%		100.0%		100.0%	

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 21300 - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	5	100.0%	1	50.0%	3	50.0%
Upper	0	0.0%	0	0.0%	1	50.0%	2	50.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	5	100.0%	2	100.0%	5	100.0%

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 27060

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	20.7%	13.0%
Moderate	6	100.0%	100.0%	51.1%	44.4%	0	0.0%	0.0%	18.5%	15.6%
Middle	0	0.0%	0.0%	48.9%	55.6%	2	33.3%	39.8%	31.1%	36.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	38.7%	20.7%	25.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	21.5%	8.9%	9.0%
Total	6	100.0%	100.0%	100.0%	100.0%	6	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	8.5%	8.2%	5.3%
Moderate	3	60.0%	33.4%	53.6%	47.1%	0	0.0%	0.0%	13.4%	11.1%
Middle	2	40.0%	66.6%	46.4%	52.9%	3	60.0%	53.3%	34.0%	29.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	37.1%	45.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	38.1%	7.2%	9.6%
Total	5	100.0%	100.0%	100.0%	100.0%	5	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	4	40.0%	14.3%	16.0%	7.4%
Moderate	10	100.0%	100.0%	62.7%	58.9%	4	40.0%	13.6%	20.0%	18.3%
Middle	0	0.0%	0.0%	37.3%	41.1%	2	20.0%	72.1%	29.3%	22.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	34.7%	51.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	10	100.0%	100.0%	100.0%	100.0%	10	100.0%	100.0%	100.0%	100.0%
	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%	59.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	40.8%	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%
Total	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	23.8%	6.8%	15.4%	8.3%
Moderate	19	90.5%	68.2%	54.7%	48.4%	4	19.0%	2.6%	17.0%	12.1%
Middle	2	9.5%	31.8%	45.3%	51.6%	7	33.3%	52.4%	31.2%	28.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	14.3%	12.8%	28.9%	29.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	9.5%	25.4%	7.4%	22.0%
Total	21	100.0%	100.0%	100.0%	100.0%	21	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS									
	By Tract Income									
		Bank				Aggregate				
	#	%	% \$(000s)	%	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)
Low	0		0.0%	0.0%		0.0%		0.0%		0.0%
Moderate	2		100.0%	100.0%		50.3%		45.4%		
Middle	0		0.0%	0.0%		49.7%		54.6%		
Upper	0		0.0%	0.0%		0.0%		0.0%		0.0%
Unknown	0		0.0%	0.0%		0.0%		0.0%		0.0%
Tract Unknown	0		0.0%	0.0%		0.0%		0.0%		0.0%
Total	2		100.0%	100.0%		100.0%		100.0%		100.0%
	By Revenue									
\$1 Million or Less	2		100.0%	100.0%		54.7%		54.4%		
	By Loan Size									
\$100,000 or less	2		100.0%	100.0%		98.1%		64.5%		
\$100,001-\$250,000	0		0.0%	0.0%		1.2%		11.7%		
\$250,001-\$1 Million	0		0.0%	0.0%		0.6%		23.8%		
Total	2		100.0%	100.0%		100.0%		100.0%		100.0%

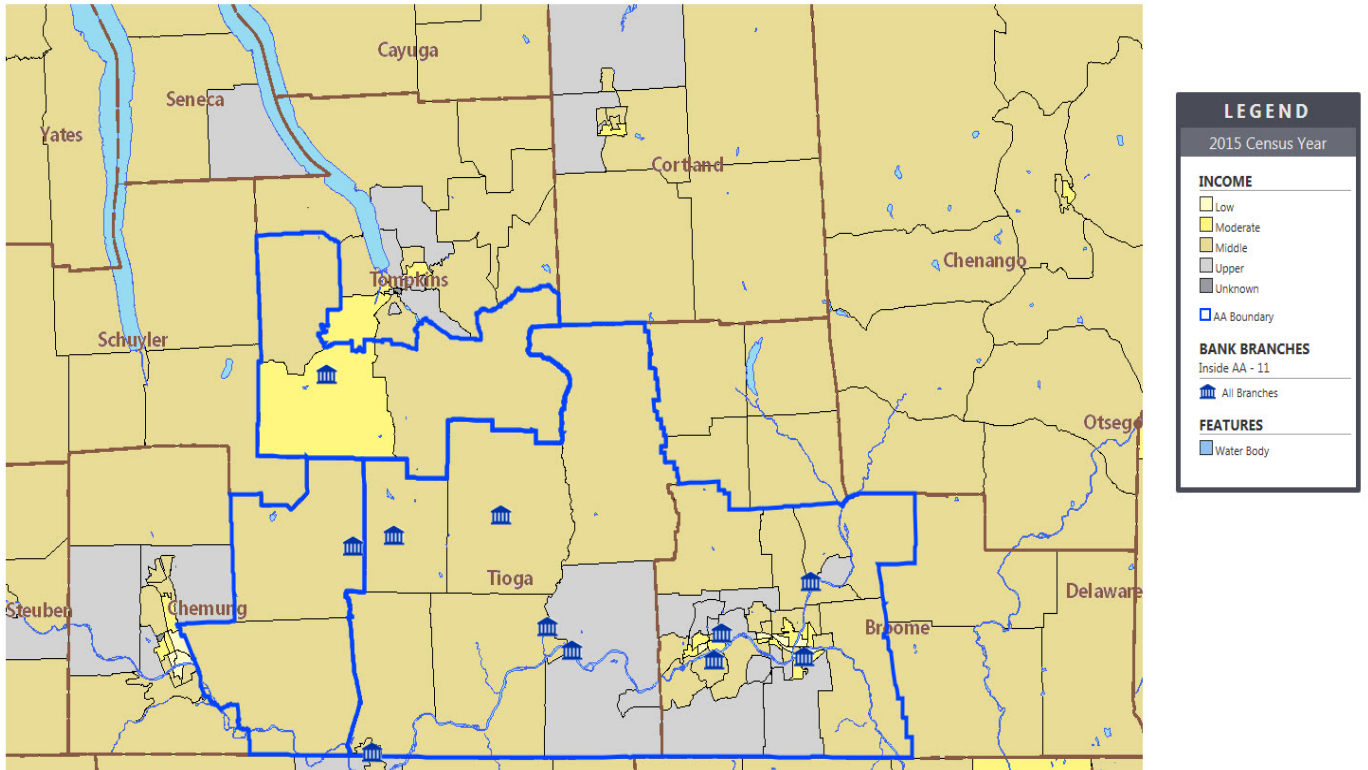
Originations and Purchases

Consumer Loan Distribution Table
Assessment Area/Group : MSA 27060 - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	4	44.4%	25	33.4%
Moderate	9	100.0%	74	100.0%	3	33.3%	32	42.9%
Low/Moderate Total	9	100.0%	74	100.0%	7	77.8%	56	76.2%
Middle	0	0.0%	0	0.0%	1	11.1%	3	3.4%
Upper	0	0.0%	0	0.0%	1	11.1%	35	20.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	74	100.0%	9	100.0%	74	100.0%

CRA APPENDIX B

MAP OF THE ASSESSMENT AREA



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 LMI 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 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.