

PUBLIC DISCLOSURE

September 12, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Adirondack Trust Company
RSSD No. 645317**

**473 Broadway
Saratoga Springs, NY 12866**

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

Adirondack Trust Company (“ATC”) is rated “Satisfactory”.

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

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

The major factors supporting this rating follow:

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

DESCRIPTION OF INSTITUTION

ATC is a full service commercial bank headquartered in Saratoga Springs, NY. ATC is a subsidiary of 473 Broadway Holding Corporation, a bank holding company. ATC operates eleven retail branches located throughout the central portion of Saratoga County and the southeastern portion of Warren County, in the eastern-central part of New York State.

ATC's product base consists of various consumer and commercial lending and deposit products, trust services, and insurance services. Loan products include residential mortgages, small business loans, and consumer loans. As of June 30, 2016, ATC had total assets of \$1.08 billion, net loans and leases of \$693 million, and total deposits of \$939 million.

Based on deposits reported to the Federal Deposit Insurance Corporation on June 30, 2016, ATC ranked 1st of 17 banks in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area, with 21 percent of deposit market share. In the MSA 24040 (Glens Falls, NY) assessment area, ATC is ranked 9th out of 10 banks with 2 percent of the deposit market share.

ATC's previous CRA performance evaluation was dated April 29, 2013, and ATC received an overall rating of "Satisfactory". There are no financial or legal factors that would prevent ATC from fulfilling its obligations under CRA.

DESCRIPTION OF ASSESSMENT AREAS

ATC has two assessment areas, consisting of portions of Saratoga County and Warren County, which are contiguous counties in New York State. The assessment areas are predominantly rural and consist of a total of 43 census tracts, of which six are moderate-income tracts, 36 are middle- and upper-income tracts, and one tract that has no income designation. There are no low-income geographies in ATC's assessment areas. A description of the assessment areas follows:

MSA 10580 (Albany-Schenectady-Troy, NY), consisting of portions of Saratoga County that include the municipalities of Saratoga, Saratoga Springs, Stillwater, Malta, Ballston, Milton, Greenfield, Wilton, Northumberland, Moreau, Town of Corinth, and Village of Corinth.

MSA 24020 (Glens Falls, NY), consisting of a small portion of Warren County which includes the municipalities of Glens Falls, Glens Falls North, West Glens Falls, Town of Queensbury, and town of Lake George.

ATC has not changed its assessment areas since the prior examination. ATC's assessment areas are in compliance with the requirements of 12 CFR §228.41 and do not arbitrarily exclude low- and moderate-income ("LMI") geographies.

Additional assessment area data can be found in Exhibit I. A map illustrating ATC's assessment areas is located in Appendix B.

Exhibit I Key Assessment Area Data¹

	MSA 10580 (Saratoga County, NY)	MSA 24020 (Warren County, NY)	Totals
Total Population	139,153	49,463	188,616
Population % of AA population	74%	26%	100%
Families	36,027	13,605	49,632
Families % of AA families	73%	27%	100%
Total Census Tracts	30	13	43
Tracts % AA tracts	70%	30%	100%
LMI tracts	4	2	6
LMI tracts % all AA LMI tracts	67%	33%	100%
Total owner-occupied units	39,721	14,076	53,797
units % of AA units	74%	26%	100%
Business Establishments	6,591	2,952	9,543
Bus. Est. % AA bus. Est.	69%	31%	100%
Number of Branches	9	2	11
Branches % all branches	82%	18%	100%
Branches in LMI tracts	0	0	0
LMI branches % AA LMI branches	0	0	0
Branch Deposits (\$'000)	901,544	37,496	939,040
Deposits % AA deposits	96%	4%	100%
Deposit Market Share (%)/Rank in Market	21.14%/1	2.21%/9	N/A

SCOPE OF EXAMINATION

Procedures

ATC was examined using the Federal Financial Institutions Examination Council's Intermediate Small Bank CRA examination procedures, which consist of the lending test and community development test.

Products

Loan products analyzed during this examination included home purchase, refinance, home improvement, and small business loans, as well as other loans qualifying as community development loans. Real estate-related loans were reported under the Home Mortgage Disclosure Act (HMDA).

Examination Period

All HMDA-related and small business loans originated between January 1, 2013 and December 31, 2015 were used in the analysis. ATC's HMDA-related and small business loan data was

¹ Data in the table is reflective of 2010 Census data, 2015 Dun & Bradstreet data, and June 30, 2016 Deposit Market Share data.

verified by examiners. Loans, investments, philanthropic grants, and services provided between April 1, 2013 and June 30, 2015 were evaluated as qualifying community development activities.

Lending Distribution Analysis

The borrower and geographic loan distribution analyses were based on loan activity in ATC's assessment areas. ATC's performance was compared to 2010 Census demographic data.

To analyze the borrower characteristics of HMDA-related lending, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment areas. Income estimates from the U.S. Department of Housing and Urban Development ("HUD") were used to categorize borrower income. For small business lending, ATC's proportion of loans to businesses with gross annual revenues ("GAR") of \$1 million or less was compared to the proportion of all such businesses located in the assessment areas, based on Dunn and Bradstreet data. The size of the small business loans was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

To analyze the geographic distribution, the proportion of HMDA-related loan originations was compared with the proportion of owner-occupied housing units located in moderate-income geographies of the assessment areas. For small business loans, the analysis compared the proportion of loan originations with the proportion of businesses located in moderate-income geographies. There are no low-income geographies in the assessment areas.

Borrower and geographic distribution analyses compared ATC's 2013 and 2014 performance to the 2013 and 2014 performance data for the aggregate of all loan reporters in the assessment areas, respectively. The 2014 aggregate data was the most recent aggregate performance data publicly available at the time of this evaluation. ATC's performance in 2015 was also compared to preliminary 2015 aggregate data to determine consistency with performance in 2013 and 2014.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews with two community-based organizations. One organization specializes in affordable housing while the other provides community services to the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

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

of HMDA-related and small business loans reflected reasonable penetration throughout the assessment areas.

LOAN-TO-DEPOSIT RATIO

ATC's loan-to-deposit ("LTD") ratio was reasonable given the institution's size, financial condition, and the credit needs of its assessment areas.

ATC's average LTD ratio for the eight quarters between January 1, 2013 and June 30, 2016 was 65%, based on information reported in ATC's Consolidated Report of Condition and Income. While this ratio was below the average of 81% for similarly-sized banks operating in ATC's assessment area, performance consideration was given to ATC's business strategy, under which the bank sold most of its mortgage loans to FNMA, thereby reducing its LTD ratio. ATC's LTD ratio is stable and remains consistent with its LTD at the prior CRA examination.

LENDING IN ASSESSMENT AREA

ATC originated a substantial majority of loans in its assessment areas. Eighty percent of ATC's HMDA-related loans and 82 percent of ATC's small business loans originated during the review period were originated in ATC's assessment areas.

LENDING TO BORROWERS OF DIFFERENT INCOMES AND TO BUSINESSES OF DIFFERENT SIZES

ATC's overall lending penetration among borrowers of different income levels (including LMI individuals) and businesses of different sizes was reasonable, based on overall reasonable performance in MSA 10580.

GEOGRAPHIC DISTRIBUTION OF LOANS

ATC's overall geographic distribution of loans reflected reasonable dispersion, based on overall reasonable performance in MSA 10580.

RESPONSE TO COMPLAINTS

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

COMMUNITY DEVELOPMENT TEST

ATC's community development performance demonstrated excellent responsiveness to the community development needs of its assessment areas. This conclusion was based on an excellent level of community development loans, qualified investments, and community development services, primarily in MSA 10580. This assessment also considered ATC's

capacity and the need and availability of opportunities for community development in the assessment areas.

During the examination period, ATC made a total of \$47 million in community development loans and qualified investments, of which 79% were made in ATC’s assessment areas. New community development loans and qualified investments made during this exam period totaled \$33.3 million or 71%. On an annualized basis, ATC’s total community development efforts in terms of dollar volume increased by 27% compared to the prior examination. See chart below for details of ATC’s total community development loans and qualified investments made during the review period.

Community Development Loans and Qualified Investments										
Assessment Area	Affordable Housing		Economic Development		Community Services		Revitalize and Stabilize		Combined Totals	
	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)
MSA 10580 (Saratoga County)	12	6,139	6	2,372	28	10,442	11	6,800	57	25,753
MSA 24020 (Warren County)	7	2,352	0	0	6	4,025	7	4,718	20	11,095
Broader Statewide	4	6	0	0	8	4,445	12	5,321	24	9,772
Total CD Loans and QI	23	8,497	6	2,372	42	18,912	30	16,839	101	46,620

ATC also provided a significant number of community development services, primarily in MSA 10580. A total of 36 members of ATC’s management and staff also served as directors, advisors, or committee members to 61 non-profit and community-based organizations operating throughout ATC’s assessment areas.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

**METROPOLITAN AREA
MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)
(FULL REVIEW)**

DESCRIPTION OF OPERATIONS

ATC’s banking activities within its assessment areas were primarily conducted in MSA 10580. As of June 30, 2016, ATC operated nine of its eleven branches (82%) in this assessment area. These branches generated \$901.5 million in deposits, which accounts for 96% of ATC’s total branch deposits as of June 30, 2016. Of ATC’s HMDA loans originated in its assessment areas during the review period, 92% were originated in this assessment area. Of its total small business loans originated in the assessment areas, 84% were originated in this MSA. For additional assessment area data, see Exhibits I and II.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's 2010 Bureau of Census, the U.S. Department of Labor, the U.S. Department of Housing and Urban Development (HUD), and the National Association of Realtors.

ATC's market area is highly competitive with branches of local, regional, and international banks, mortgage companies, and other financial institutions operating within the assessment area. Primary bank competitors in the local market include TrustCo Bank, First Niagara Bank, NA, Saratoga National Bank, Ballston Spa National Bank, and Bank of America, NA.

Demographic Characteristics

The MSA 10580 assessment area consists solely of a portion of Saratoga County. Saratoga County is in northeastern New York's Capital Region, which is within 180 miles of Boston, New York City, and Montreal, Canada. The assessment area has 30 census tracts, of which 13% are moderate-income, 70% are middle-income, and 13% are upper-income geographies. The assessment area has no low-income geographies and one tract has no income designation. The assessment area continues to grow in population. According to the 2010 Census, the assessment area has a population of 139,153, representing a 10% growth in population since the 2000 Census. This growth in ATC's assessment area is significant when compared to the population growth in the overall MSA 10580 (Albany-Schenectady-Troy, NY), which has grown by only 5% since the 2000 census. According to the 2010 Census, 9% of the assessment area families reside in moderate-income geographies, while 75% reside in middle-income and 17% in upper-income geographies.

The median age of the Saratoga County population is 42 years, which is higher than the New York State median age of 38 years. The percentage of the population aged 65 and older in Saratoga County is 13.7%, which is similar to the 13.5% of New York State population at age 65 and over.

Exhibit II provides a summary of demographic information related to ATC's MSA 10580 assessment area.

Income Characteristics

Saratoga County is a thriving affluent community. According to the 2010 Census data, 18% of families are low-income, 19% of families are moderate-income, 23% of families are middle-income, and 40% are upper-income. Of the total families residing in the assessment area, 4% live below the poverty level. HUD's median family income ("MFI") for MSA 10580 was \$82,700 in 2015, \$78,300 in 2014, and \$77,700 in 2013, exceeding New York State MFI of \$71,913 in 2015, \$71,419 in 2014 and \$70,670 in 2013.

Housing Characteristics

The 2010 Census indicates that the assessment area has 60,499 housing units, of which 66% are owner-occupied, 25% are rental, and 9% are vacant. Eight percent of owner-occupied units are located in moderate-income geographies. Community contacts indicate that affordable housing continues to be a challenge which limits opportunities to lend to LMI borrowers, particularly in Saratoga Springs.

Saratoga County has been relatively isolated from significant economic fluctuations resulting from the recent recession and housing crisis. According to the National Association of Realtors, the median annual sales price of existing single-family homes in MSA 10580 was \$206,300 in 2015. From 2012 to 2015, median housing prices increased by 2%.

Exhibit II

Assessment Area Demographics

MSA 10580 (Saratoga County, NY)

Assessment Area(s): MSA 10580 - 2015

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	6,449	17.9	
Moderate-income	4	13.3	3,054	8.5	288	9.4	6,763	18.8	
Middle-income	21	70.0	26,851	74.5	1,172	4.4	8,324	23.1	
Upper-income	4	13.3	6,122	17.0	140	2.3	14,491	40.2	
Unknown-income	1	3.3	0	0.0	0	0.0	0	0.0	
Total Assessment Area	30	100.0	36,027	100.0	1,600	4.4	36,027	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	0	0.0	0.0	0	0.0	0	0.0		
Moderate-income	5,169	3,075	7.7	59.5	1,822	35.2	272	5.3	
Middle-income	46,171	30,051	75.7	65.1	11,799	25.6	4,321	9.4	
Upper-income	9,159	6,595	16.6	72.0	1,667	18.2	897	9.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	60,499	39,721	100.0	65.7	15,288	25.3	5,490	9.1	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	428	6.5	402	6.6	17	4.1	9	16.4	
Middle-income	5,169	78.4	4,765	77.9	359	85.7	45	81.8	
Upper-income	993	15.1	949	15.5	43	10.3	1	1.8	
Unknown-income	1	0.0	1	0.0	0	0.0	0	0.0	
Total Assessment Area	6,591	100.0	6,117	100.0	419	100.0	55	100.0	
		Percentage of Total Businesses:		92.8		6.4		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	4	3.4	4	3.6	0	0.0	0	0.0	
Middle-income	109	94.0	105	93.8	4	100.0	0	0.0	
Upper-income	3	2.6	3	2.7	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	116	100.0	112	100.0	4	100.0	0	.0	
		Percentage of Total Farms:		96.6		3.4		.0	

2015 FFIEC Census Data and 2015 D&B Information

Labor, Employment, and Economic Characteristics

Saratoga County's primary industries include retail, manufacturing, technology, sports and recreation, and tourism. The area benefits from its relatively close proximity to New York City, Boston and Montreal, Canada and from its proximity to Albany, the state capital of New York.

The area also has close proximity to a number of leading universities, which enables the region to attract firms that take advantage of academic research and a concentration of skilled workers.

The area's dominant industry is state government, which has helped to insulate it from recent economic downturns. Within Saratoga Springs, tourism is a main source of income, especially during the summer months, when Saratoga Race Course is open. Tourism revenue contributes significantly to local retail shops, restaurants, hotels, and entertainment venues located in the city. Major companies doing business in Saratoga County include Quad/Graphics, State Farm Insurance, Target, Stewart's Ice Cream, Sysco Food Services, the Ball Corporation, and most recently, Global Foundries. Global Foundries, opened in Malta, NY in December 2011, is the world's first full-service semiconductor foundry.

Unemployment has decreased both on a statewide and regional level during the review period. The unemployment rate in Saratoga County remained lower than in the rest of New York State. U.S. Department of Labor reported an average Saratoga County unemployment rate of 5.8% in 2013, 4.7 in 2014 and 4.2% in 2015; whereas, unemployment rates for New York State were reported at 7.7%, 6.3%, and 5.3% in 2013, 2014, and 2015, respectively.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

ATC's overall lending test performance in the MSA 10580 assessment area is satisfactory. The overall distribution of loans to borrowers of different incomes and businesses of different sizes was reasonable. Geographic distribution of HMDA-related and small business loans represented overall reasonable penetration throughout the assessment area. The following tables display the bank's activity in 2013 for HMDA-related and small business lending as well as aggregate lending activity.

Exhibit III

HMDA Lending Distribution Table

2013 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 10580

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%	3	2.3%	1.6%	5.2%	2.4%
Moderate	1	0.8%	0.6%	5.2%	3.6%	11	8.5%	6.9%	21.3%	15.3%
Middle	78	60.5%	57.1%	76.6%	73.3%	23	17.8%	15.5%	26.2%	24.5%
Upper	50	38.8%	42.3%	18.3%	23.1%	87	67.4%	72.7%	38.6%	49.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	3.9%	3.3%	8.7%	7.8%
Total	129	100.0%	100.0%	100.0%	100.0%	129	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	2	2.0%	1.2%	5.2%	2.1%
Moderate	2	2.0%	0.7%	4.1%	2.7%	20	20.2%	13.0%	16.0%	10.1%
Middle	65	65.7%	56.0%	78.7%	79.7%	31	31.3%	24.3%	23.3%	17.5%
Upper	32	32.3%	43.3%	17.2%	17.6%	41	41.4%	50.8%	39.3%	39.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	5.1%	10.7%	16.3%	31.3%
Total	99	100.0%	100.0%	100.0%	100.0%	99	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	4	10.8%	5.3%	11.6%	3.9%
Moderate	1	2.7%	8.9%	4.9%	2.9%	6	16.2%	5.1%	17.1%	10.8%
Middle	22	59.5%	58.3%	74.9%	71.1%	10	27.0%	27.5%	26.3%	27.1%
Upper	14	37.8%	32.8%	20.2%	26.0%	16	43.2%	61.9%	43.4%	56.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.7%	0.2%	1.7%	1.9%
Total	37	100.0%	100.0%	100.0%	100.0%	37	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%	13.0%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	28.2%	73.9%	54.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	50.0%	71.8%	13.0%	44.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	2	100.0%	100.0%	100.0%	100.0%	2	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	9	3.4%	1.7%	5.6%	2.1%
Moderate	4	1.5%	1.1%	4.7%	3.0%	37	13.9%	8.9%	18.3%	11.5%
Middle	166	62.2%	56.6%	77.5%	74.9%	64	24.0%	19.2%	24.7%	19.4%
Upper	97	36.3%	42.3%	17.8%	22.2%	144	53.9%	63.8%	39.1%	41.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	4.9%	6.5%	12.3%	25.8%
Total	267	100.0%	100.0%	100.0%	100.0%	267	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Moderate	9	4.9%	2.7%	5.6%	4.4%					
Middle	147	80.3%	86.1%	79.2%	81.4%					
Upper	27	14.8%	11.2%	15.2%	14.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%					
Total	183	100.0%	100.0%	100.0%	100.0%					
By Revenue										
\$1 Million or Less	94	51.4%	50.6%	47.6%	32.3%					
By Loan Size										
\$100,000 or less	128	69.9%	17.8%	90.6%	24.5%					
\$100,001-\$250,000	25	13.7%	18.8%	4.2%	15.1%					
\$250,001-\$1 Million	30	16.4%	63.4%	5.2%	60.4%					
Total	183	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

LENDING TO BORROWERS OF DIFFERENT INCOMES AND TO BUSINESSES OF DIFFERENT SIZES

The overall distribution of HMDA-related and small business loans reflected reasonable penetration among individuals of different income levels and businesses of different sizes. ATC's performance was compared to 2010 Census demographic data and 2013 and 2014 aggregate data, while its performance in 2015 was compared to preliminary 2015 aggregate data. Additional weight was put into aggregate comparison because unknown factors impacting the bank's performance may also impact the entire industry. An analysis of the lending distribution in each loan category follows:

Home Purchase Loans

ATC's distribution of home purchase loans to LMI borrowers was poor. In 2013, ATC extended three or 2.3% of its home purchase loans to low-income borrowers, compared to 17.9% of low-income families residing in the assessment area. ATC's home purchase lending to low-income borrowers was slightly below the aggregate, which originated 5.2% of its home purchase loans to low-income borrowers. ATC's 2014 and 2015 home purchase lending to low-income borrows was less favorable, when compared to the number of low-income families in the assessment area.

In 2013, ATC extended eleven or 8.5% of its home purchase loans to moderate-income borrowers, compared to 18.8% of moderate-income families residing in the assessment area. ATC's 2013 home purchase lending to moderate-income borrowers was below the aggregate, which originated 21.3% of its home purchase loans to moderate-income borrowers. ATC's 2014 and 2015 home purchase lending to moderate-income borrowers was less favorable, when compared to the number of moderate-income families in the assessment area.

Refinance Loans

ATC's distribution of refinance loans to LMI borrowers was reasonable. In 2013, ATC extended two or 2% of its refinance loans to low-income borrowers, compared to 18% of low-income families residing in the assessment area. ATC refinance lending to low-income was slightly below the aggregate, which originated 5% of its refinance loans to low-income borrowers. ATC's 2014 refinance lending to low-income borrowers was less favorable and its 2015 refinance lending to low-income borrower was more favorable, when compared to the number of low-income families in the assessment area.

In 2013, ATC extended 20 or 20% of its refinance loans to moderate-income borrowers, compared to 19% of moderate-income families residing in the assessment area. ATC's 2013 refinance lending to moderate-income borrowers was above the aggregate, which originated 16% of its refinance loans to moderate-income borrowers. ATC's 2014 refinance lending to moderate-income borrowers was similar to 2013 performance and 2015 lending to moderate-

income borrowers was less favorable, when compared to the number of moderate-income families in the assessment area.

Home Improvement Loans

ATC's distribution of home improvement loans to LMI borrowers was reasonable. In 2013, ATC extended four or 11% of its home improvement loans to low-income borrowers, compared with 18% of low-income families residing in the assessment area. ATC's 2013 home improvement lending to low-income borrowers was similar to the aggregate, which originated 12% of its home improvement loans to low-income borrowers. ATC's home improvement lending performance in 2014 and 2015 was similar to 2013, when compared to the number of low-income families residing in the assessment area.

In 2013, ATC extended six or 16% of its home improvement loans to moderate-income borrowers, compared to 19% of moderate-income families residing in the assessment area. ATC's 2013 home improvement lending was similar to the aggregate, which originated 17% of its home improvement loans to moderate-income borrowers. ATC's performance in 2014 was below 2013 performance and 2015 performance was slightly below 2013 performance, when compared to the number of moderate-income families residing in the assessment area.

Lending to Businesses of Different Sizes

ATC's distribution of loans to businesses of different sizes was reasonable in MSA 10580. In 2013, ATC made 94 or 51% of loans to businesses with GAR of \$1 million or less, compared to 91% of such businesses operating in the assessment area. ATC's 2013 performance exceeded the aggregate, which reported 48% of its loans to small businesses. ATC's small business lending performance in 2014 and 2015 were above 2013 lending performance.

Of ATC's small business loans, 70% in 2013 were in amounts of \$100 thousand or less. ATC's proportion of 2013 small business loans that were in the amount of \$100 thousand or less was below the aggregate, which originated 91% of its loans in amounts of \$100 thousand or less. The comparison of loans in the amount of \$100 thousand or less is skewed as the aggregate included large national credit card lenders which typically offer credit in smaller dollar amounts. ATC's small business loans in amount of \$100 thousand or less in 2014 was more favorable compared to 2013 performance and 2015 performance was comparable to 2013.

GEOGRAPHIC DISTRIBUTION OF LOANS

ATC's overall geographic distribution of loans reflected reasonable dispersion throughout MSA 10580. This evaluation is based on ATC's penetration in moderate-income census tracts, as there are no low-income tracts in MSA 10580. ATC's performance was compared to 2010 Census demographic data and 2013, 2014, and preliminary 2015 aggregate data.

Opportunities to lend in moderate-income areas in the assessment area are less available, as the percentage of owner-occupied housing units located in moderate-income tracts is 8% and the percentage of small businesses in moderate-income areas is 7%. Performance consideration was made for ATC's assessment area market, which is highly competitive, with large financial institutions operating as the primary lenders in the market. An analysis of the lending distribution in each loan category follows:

Home Purchase Loans

ATC's distribution of home purchase loans in moderate-income geographies was reasonable. In 2013, ATC originated one or 1% of its home purchase loans in moderate-income areas, compared to 8% of owner-occupied housing units located in moderate-income geographies in the MSA. ATC's performance was slightly below the aggregate, which made 5% of its home purchase loans in moderate-income geographies. ATC's performance in 2013 was similar to its 2014 and 2015 performance.

Refinance Loans

ATC's distribution of refinance loans in moderate-income geographies was reasonable. In 2013, ATC originated two or 2% of its refinance loans in moderate-income census tracts, compared to 8% of owner-occupied housing units located in moderate-income geographies. ATC's refinance lending performance in moderate-income geographies was comparable to the aggregate, which made 4% of its refinance loans in moderate-income geographies. Performance in 2014 and 2015 was more favorable than 2013 performance.

Home Improvement Loans

ATC's distribution of home improvement loans in moderate-income geographies was reasonable. In 2013 ATC originated one or 3% of its home improvement loans in moderate-income geographies, compared to 8% of owner-occupied housing units located in moderate-income geographies. ATC's performance in 2013 was comparable to the aggregate, which made 5% of its home improvement loans in moderate-income geographies. ATC's performance in 2014 was more favorable than performance in 2013 and performance in 2015 was comparable to 2013 performance.

Small Business Loans

ATC's distribution of small business loans in moderate-income geographies was reasonable. ATC originated nine or 5% small business loans in moderate-income geographies in 2013, compared to 7% of small businesses in the assessment area operating in moderate-income geographies. ATC's 2013 small business lending in moderate-income geographies was similar to the aggregate, which made 6% of its small business loans in moderate-income geographies.

ATC’s performance in 2014 was less favorable than its 2013 performance and its 2015 performance was comparable to 2013 performance.

COMMUNITY DEVELOPMENT TEST

ATC’s community development performance in MSA 10580 demonstrates excellent responsiveness to the community development needs of the assessment area. This assessment of ATC’s performance considers ATC’s capacity and the need and availability of opportunities for community development activities in MSA 10580.

ATC’s community development loans and qualified investments targeting MSA 10580 totaled \$25.7 million or 59% of ATC’s overall community development loans and qualified investments. Sixty-three percent of community development loans and qualified investments were new activities made during the examination period.

Community Development Loans and Qualified Investments										
MSA 10580 (Saratoga County)										
	Affordable Housing		Economic Development		Community Services		Revitalize and Stabilize		Combined Totals	
	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)
Total CD Loans and QI	12	6,138	6	2,372	28	10,442	11	6,800	57	25,752
Total% (#/\$)	21%	24%	11%	9%	49%	41%	19%	26%	100%	100%

On an annualized basis, ATC’s community development loans and qualified investments in MSA 10580 increased by 4%, compared to the prior examination. When compared to four similarly-situated banks operating in the assessment area, ATC annualized community development loans and qualified investments as a percent of average assets and deposits compared favorably.

ATC was responsive to credit needs in MSA 10580. Of the bank’s total community development loans and qualified investments, 41% targeted organizations providing services to LMI individuals. Discussions with community contacts also identified affordable housing as an important assessment area need, since housing prices in the assessment area are high relative to other areas of the state. ATC dedicated 24% of community development loans and qualified investments to affordable housing projects.

In terms of community development services, ATC officers, directors and employees served on boards or committees of 63 non-profit organizations.

ATC made \$23.1 million in community development loans in MSA 10580. Of this total, 45% financed community service projects, and 26% was for activities that promoted affordable

housing. A total of 69% of community development loans represented new commitments originated since the prior CRA evaluation.

Examples of ATC's community development loans made in MSA 10580 include:

- A \$4.5 million loan to a local hospital in Saratoga Springs to renovate an assisted living facility, which will provide affordable health-related services to LMI individuals.
- A \$1.6 million loan to an affordable housing group that will provide 28 affordable housing units in Saratoga Springs, NY.
- A \$250 thousand line of credit to finance operating expenses for an organization that provides services to LMI individuals.

ATC's qualified investments in MSA 10580 totaled \$3 million, demonstrating good responsiveness to community development needs. In terms of dollar amount, 89% of the investments targeted economic development efforts and 11% targeted revitalization and stabilization efforts in moderate-income geographies in the assessment area. Qualified investments consisted primarily of targeted municipal bonds and charitable contributions. New investments made during the examination period consisted of municipal bonds totaling \$280 thousand or 2.8% of the total new qualified investments and charitable donations totaling \$331 thousand made to community development organizations throughout MSA 10580.

One example of a qualified investment the bank made is a \$2.9 million general obligation bond to fund a community center in the Town of Malta. The center provides services targeted to LMI individuals such as a food pantry and assistance in obtaining social services.

ATC provided a significant amount of community development services in MSA 10580, including technical services such as seminars in financial literacy, mortgage education, and small business training. In addition, management and staff members served as directors, advisors, or committee members to non-profit and community based organizations throughout MSA 10580. These community development organizations include:

- An organization that distributes block grants to promote economic development.
- An organization that provides emergency shelter to victims of domestic violence and supportive services to prevent or alleviate homelessness.
- An organization that provides shelter, affordable housing opportunities, advocacy, referral services and informational resources, to adults in the Greater Saratoga Region who are homeless, or at risk of homelessness.

- A non-profit organization that provides LMI veterans and others with both shelter and support. Services offered includes transitional housing for homeless male and female veterans, permanent housing for veterans and their families, employment and training assistance for veterans, and mortgage assistance for affordable home ownership.

METROPOLITAN AREA MSA 24020 (GLENS FALLS, NY)

(LIMITED REVIEW)

ATC has a limited presence in the Glens Falls, NY assessment area, reflective of its lending and deposit activity. As such, a limited evaluation of ATC's performance in this assessment area was completed. ATC's performance in this assessment area was consistent with overall lending performance and consistent with overall community development performance, given ATC's limited presence in this assessment area. Only two of ATC's eleven branches operated in the Glens Falls, NY assessment area. As of June 30, 2016, these branches generated 4.0% of ATC's total branch deposits. See Exhibit I for additional assessment area data.

The Glens Falls, NY assessment area is made up of thirteen census tracts in Warren County, NY. Of the thirteen census tracts, two are moderate-income, seven are middle-income, and four are upper-income. The assessment area does not have any low-income census tracts.

In 2013, ATC made a total of 25 HMDA-related loans in this assessment area. The bank made two home purchase and two home improvement loans to moderate-income borrowers and no loans to low-income borrowers. ATC originated one HMDA-related loan in a moderate-income geography.

In 2013, ATC made 37 small business loans in this assessment area. Of the bank's small business loans, 60 percent were to business with \$1 million or less in annual revenue which significantly exceeds the aggregate performance of 38 percent and is below the demographic of eighty-nine percent.

Sixteen percent of the small business loans were originated in moderate-income geographies, which exceeded the aggregate's lending level of 14%, as well as the demographics of 14% of small businesses located in moderate-income geographies. ATC's HMDA-related and small business loan performance in 2014 was more favorable than 2013 and performance in 2015 was comparable to 2013. See Exhibit III for additional details on lending activity in the Glens Falls, NY assessment area.

Of ATC's total dollar amount of community development loans and investments, \$11 million was dedicated to this assessment area. Forty three percent of the dollar volume of community development loans and qualified investments targeted projects that revitalized and stabilized

LMI geographies. ATC staff and management also provided community development services to four community organizations in the Glens Falls, NY assessment area.

Exhibit IV
2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 24020

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%	5.8%	3.3%
Moderate	1	9.1%	5.9%	5.4%	3.5%	2	18.2%	16.6%	22.1%	17.2%
Middle	5	45.5%	36.1%	62.8%	58.4%	3	27.3%	19.4%	28.4%	25.3%
Upper	5	45.5%	58.0%	31.8%	38.1%	5	45.5%	58.0%	32.2%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	5.9%	11.5%	10.3%
Total	11	100.0%	100.0%	100.0%	100.0%	11	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	2.4%
Moderate	0	0.0%	0.0%	4.5%	2.8%	0	0.0%	0.0%	12.3%	8.2%
Middle	2	25.0%	16.0%	55.3%	51.0%	0	0.0%	0.0%	22.9%	19.0%
Upper	6	75.0%	84.0%	40.2%	46.2%	8	100.0%	100.0%	47.7%	57.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.4%	13.3%
Total	8	100.0%	100.0%	100.0%	100.0%	8	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%	6.4%	1.5%
Moderate	0	0.0%	0.0%	2.7%	1.9%	2	40.0%	5.0%	23.6%	21.1%
Middle	5	100.0%	100.0%	57.3%	51.1%	0	0.0%	0.0%	19.1%	17.2%
Upper	0	0.0%	0.0%	40.0%	47.0%	3	60.0%	95.0%	50.0%	60.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.9%	0.1%
Total	5	100.0%	100.0%	100.0%	100.0%	5	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	1	100.0%	100.0%	100.0%	100.0%	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%	1	100.0%	100.0%	100.0%	100.0%
Total	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.3%	2.8%
Moderate	1	4.0%	2.8%	4.8%	3.2%	4	16.0%	7.9%	17.8%	13.2%
Middle	13	52.0%	29.0%	59.1%	54.9%	3	12.0%	9.1%	25.2%	22.2%
Upper	11	44.0%	68.2%	36.1%	42.0%	16	64.0%	78.8%	40.4%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	8.0%	4.2%	11.3%	11.5%
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)	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	6	16.2%	16.2%	7.1%	7.1%	13.6%	13.6%	14.1%	14.1%	14.1%
Middle	23	62.2%	62.2%	68.8%	68.8%	54.0%	54.0%	57.5%	57.5%	57.5%
Upper	8	21.6%	21.6%	24.0%	24.0%	32.4%	32.4%	28.4%	28.4%	28.4%
Unknown	0	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%	0.0%
Total	37	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
By Revenue										
\$1 Million or Less	22	59.5%	59.5%	57.7%	57.7%	36.7%	36.7%	29.9%	29.9%	29.9%
By Loan Size										
\$100,000 or less	23	62.2%	62.2%	21.2%	21.2%	88.7%	88.7%	25.8%	25.8%	25.8%
\$100,001-\$250,000	9	24.3%	24.3%	25.4%	25.4%	4.9%	4.9%	15.3%	15.3%	15.3%
\$250,001-\$1 Million	5	13.5%	13.5%	53.3%	53.3%	6.4%	6.4%	58.9%	58.9%	58.9%
Total	37	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

CRA APPENDIX A

GLOSSARY

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 the 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 the 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; activities that revitalize or stabilize low- or moderate-income geographies; or loans, investments or services that (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301c of the Housing and Economic Recovery Act of 2008 ("HERA"), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program ("NSP"); (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; (iii) Benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or geographies outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

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

Full review: Performance is analyzed considering performance context, quantitative factors and qualitative factors.

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, withdrawn).

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

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

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

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

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

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

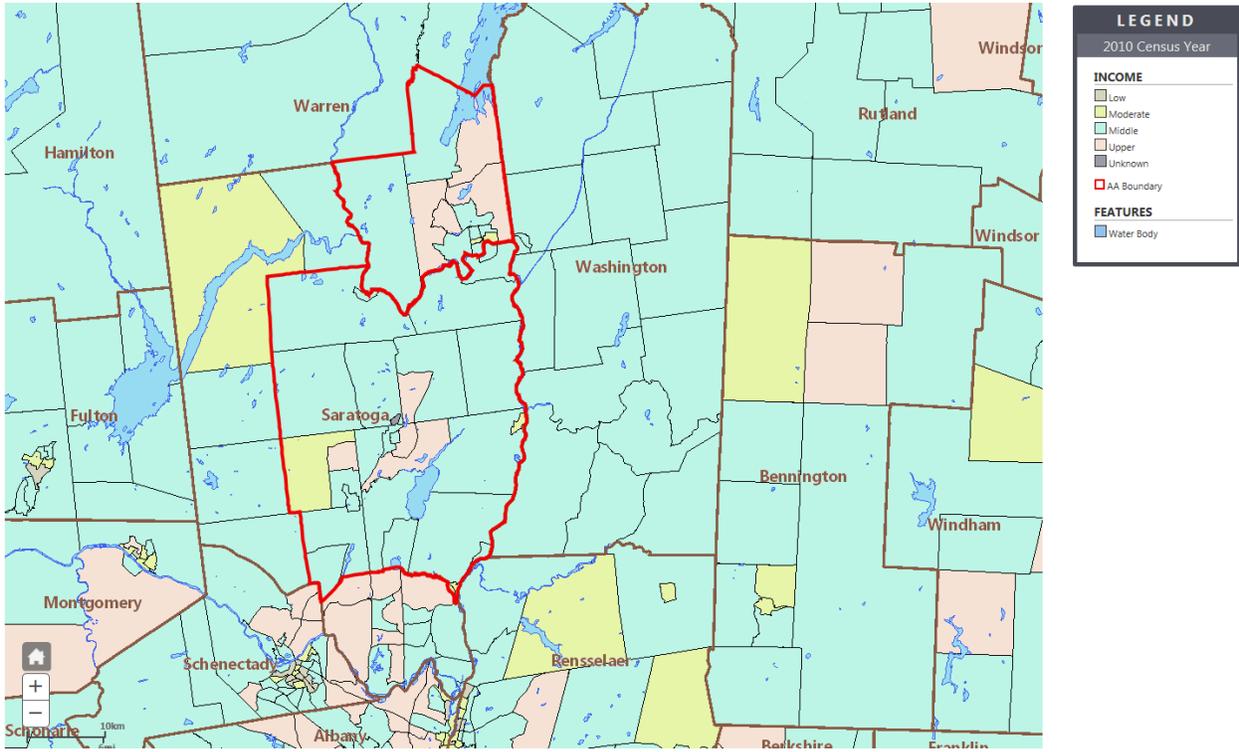
Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share or grant that has as its primary purpose community development.

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 geography.

CRA APPENDIX B

ASSESSMENT AREA MAP



Appendix C
Loan Distribution Tables

2014 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 10580

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	2.0%	0.4%	6.4%	3.0%
Moderate	0	0.0%	0.0%	6.5%	4.4%	3	5.9%	4.7%	21.0%	15.3%
Middle	34	66.7%	65.8%	76.2%	73.6%	13	25.5%	22.9%	23.6%	21.8%
Upper	17	33.3%	34.2%	17.3%	22.1%	29	56.9%	66.8%	36.9%	48.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	9.8%	5.2%	12.0%	11.4%
<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.6%	2.2%	6.5%	4.0%
Moderate	1	3.6%	0.6%	5.4%	4.7%	6	21.4%	11.3%	16.6%	11.7%
Middle	19	67.9%	57.4%	78.8%	73.4%	5	17.9%	15.7%	23.2%	21.0%
Upper	8	28.6%	42.0%	15.8%	21.9%	15	53.6%	67.9%	35.5%	44.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.6%	2.9%	18.2%	18.6%
<i>Total</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	14.3%	2.2%	9.3%	2.4%
Moderate	1	7.1%	9.1%	6.6%	4.6%	1	7.1%	9.1%	17.2%	11.6%
Middle	9	64.3%	32.2%	78.5%	71.5%	2	14.3%	1.4%	25.8%	17.3%
Upper	4	28.6%	58.7%	14.9%	23.9%	9	64.3%	87.3%	39.4%	53.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.3%	15.2%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	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%	13.0%	1.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	78.3%	74.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.7%	24.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	4	4.3%	1.0%	6.6%	2.8%
Moderate	2	2.2%	0.4%	6.2%	4.0%	10	10.8%	6.7%	19.2%	12.0%
Middle	62	66.7%	62.5%	77.3%	73.5%	20	21.5%	20.2%	23.5%	18.1%
Upper	29	31.2%	37.1%	16.6%	22.5%	53	57.0%	67.8%	36.5%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	6.5%	4.4%	14.2%	26.8%
<i>Total</i>	<i>93</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>93</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	SMALL BUSINESS									
	By Tract Income									
		Bank		Aggregate						
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0		0.0%		0.0%		0.0%		0.0%	0.0%
Moderate	4		2.3%		0.2%		4.3%		2.7%	2.7%
Middle	132		75.9%		75.5%		80.8%		86.5%	86.5%
Upper	38		21.8%		24.3%		14.8%		10.8%	10.8%
Unknown	0		0.0%		0.0%		0.1%		0.0%	0.0%
Tract Unknown	0		0.0%		0.0%		0.0%		0.0%	0.0%
<i>Total</i>	<i>174</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>
	By Revenue									
\$1 Million or Less	<i>107</i>		<i>61.5%</i>		<i>64.8%</i>		<i>40.9%</i>		<i>29.5%</i>	
	By Loan Size									
\$100,000 or less	<i>136</i>		<i>78.2%</i>		<i>28.0%</i>		<i>92.6%</i>		<i>29.6%</i>	
\$100,001-\$250,000	<i>23</i>		<i>13.2%</i>		<i>25.5%</i>		<i>3.2%</i>		<i>14.1%</i>	
\$250,001-\$1 Million	<i>15</i>		<i>8.6%</i>		<i>46.5%</i>		<i>4.2%</i>		<i>56.3%</i>	
<i>Total</i>	<i>174</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>		<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 24020

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%	3.4%	1.4%
Moderate	0	0.0%	0.0%	6.5%	4.1%	1	16.7%	2.5%	18.2%	13.2%
Middle	2	33.3%	12.3%	54.7%	48.7%	0	0.0%	0.0%	26.1%	23.6%
Upper	4	66.7%	87.7%	38.8%	47.2%	4	66.7%	87.9%	40.4%	50.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	9.6%	11.9%	11.0%
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%	0	0.0%	0.0%	4.0%	2.5%
Moderate	0	0.0%	0.0%	6.4%	4.1%	0	0.0%	0.0%	13.7%	8.0%
Middle	1	50.0%	27.0%	56.8%	52.9%	0	0.0%	0.0%	23.7%	19.7%
Upper	1	50.0%	73.0%	36.8%	43.0%	1	50.0%	73.0%	42.2%	54.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	27.0%	16.4%	15.4%
Total	2	100.0%	100.0%	100.0%	100.0%	2	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%	7.4%	6.5%
Moderate	0	0.0%	0.0%	3.7%	0.9%	1	100.0%	100.0%	19.4%	16.0%
Middle	1	100.0%	100.0%	62.0%	59.8%	0	0.0%	0.0%	26.9%	24.7%
Upper	0	0.0%	0.0%	34.3%	39.3%	0	0.0%	0.0%	44.4%	52.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.9%	0.6%
Total	1	100.0%	100.0%	100.0%	100.0%	1	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	1	100.0%	100.0%	20.0%	1.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	20.0%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	60.0%	98.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	1	100.0%	100.0%	100.0%	100.0%	1	100.0%	100.0%	100.0%	100.0%
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	1.7%
Moderate	1	10.0%	15.4%	6.2%	3.6%	2	20.0%	1.7%	16.8%	10.0%
Middle	4	40.0%	13.4%	56.0%	43.6%	0	0.0%	0.0%	25.3%	19.3%
Upper	5	50.0%	71.2%	37.8%	52.8%	5	50.0%	71.3%	41.2%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	30.0%	27.0%	12.7%	24.1%
Total	10	100.0%	100.0%	100.0%	100.0%	10	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank		Aggregate			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	7	28.0%		19.6%			12.4%		10.0%	
Middle	12	48.0%		32.7%			57.0%		70.3%	
Upper	6	24.0%		47.6%			30.6%		19.7%	
Unknown	0	0.0%		0.0%			0.0%		0.0%	
Tract Unknown	0	0.0%		0.0%			0.0%		0.0%	
Total	25	100.0%		100.0%			100.0%		100.0%	
By Revenue										
\$1 Million or Less	14		56.0%		43.2%			35.1%		30.4%
By Loan Size										
\$100,000 or less	16		64.0%		20.2%			91.2%		33.5%
\$100,001-\$250,000	6		24.0%		36.3%			4.3%		15.9%
\$250,001-\$1 Million	3		12.0%		43.5%			4.4%		50.6%
Total	25		100.0%		100.0%			100.0%		100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 10580

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%	5.2%	2.4%
Moderate	2	3.8%	2.0%	5.3%	3.3%	5	9.6%	7.8%	21.3%	14.7%
Middle	27	51.9%	44.3%	76.4%	75.0%	10	19.2%	12.5%	23.1%	19.5%
Upper	23	44.2%	53.7%	18.4%	21.6%	30	57.7%	69.4%	37.2%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	13.5%	10.2%	13.3%	17.2%
<i>Total</i>	<i>52</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>52</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	4	12.9%	6.5%	5.7%	3.0%
Moderate	2	6.5%	5.5%	5.3%	3.8%	3	9.7%	7.6%	17.3%	12.4%
Middle	23	74.2%	60.8%	78.1%	76.1%	7	22.6%	16.3%	21.9%	19.4%
Upper	6	19.4%	33.7%	16.6%	20.1%	13	41.9%	59.5%	35.4%	45.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	12.9%	10.2%	19.8%	20.1%
<i>Total</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	3	10.3%	1.9%	10.4%	2.2%
Moderate	1	3.4%	0.3%	4.9%	2.0%	4	13.8%	3.0%	15.6%	11.4%
Middle	21	72.4%	78.5%	80.4%	74.0%	6	20.7%	20.3%	25.4%	21.9%
Upper	7	24.1%	21.2%	14.7%	23.9%	15	51.7%	71.5%	44.4%	59.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.4%	3.2%	4.3%	5.5%
<i>Total</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
Multi-Family										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	4.5%	0.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	100.0%	81.8%	73.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.6%	26.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA Totals										
Low	0	0.0%	0.0%	0.0%	0.0%	7	6.0%	1.8%	5.8%	2.3%
Moderate	5	4.3%	2.5%	5.2%	3.1%	12	10.3%	6.3%	19.3%	12.4%
Middle	75	64.7%	59.3%	77.3%	75.2%	23	19.8%	11.8%	22.8%	17.5%
Upper	36	31.0%	38.2%	17.4%	21.8%	58	50.0%	55.4%	37.0%	41.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	13.8%	24.8%	15.1%	26.3%
<i>Total</i>	<i>116</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>116</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESS										
By Tract Income										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	11	5.9%	4.2%	4.2%	4.2%	4.4%	4.4%	3.2%	3.2%	3.2%
Middle	141	76.2%	75.9%	75.9%	75.9%	80.2%	80.2%	85.5%	85.5%	85.5%
Upper	33	17.8%	19.9%	19.9%	19.9%	15.4%	15.4%	11.3%	11.3%	11.3%
Unknown	0	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%	0.0%
<i>Total</i>	<i>185</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
By Revenue										
\$1 Million or Less	117	63.2%	45.8%	47.3%	47.3%	37.3%	37.3%			
By Loan Size										
\$100,000 or less	129	69.7%	18.1%	92.5%	92.5%	30.9%	30.9%			
\$100,001-\$250,000	27	14.6%	21.0%	3.2%	3.2%	12.7%	12.7%			
\$250,001-\$1 Million	29	15.7%	60.9%	4.3%	4.3%	56.4%	56.4%			
<i>Total</i>	<i>185</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>			

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 24020

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%	4.0%	1.8%
Moderate	0	0.0%	0.0%	7.1%	4.7%	1	33.3%	43.1%	20.8%	13.6%
Middle	1	33.3%	23.3%	59.6%	54.9%	1	33.3%	33.7%	24.1%	20.9%
Upper	2	66.7%	76.7%	33.3%	40.4%	1	33.3%	23.3%	39.5%	53.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.5%	9.8%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	2.0%
Moderate	0	0.0%	0.0%	5.2%	3.7%	0	0.0%	0.0%	12.0%	7.9%
Middle	1	100.0%	100.0%	59.4%	56.2%	1	100.0%	100.0%	16.7%	12.7%
Upper	0	0.0%	0.0%	35.4%	40.1%	0	0.0%	0.0%	47.7%	57.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	19.5%	19.5%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.5%	1.3%
Moderate	0	0.0%	0.0%	2.3%	2.6%	1	33.3%	21.1%	16.7%	13.8%
Middle	3	100.0%	100.0%	53.0%	51.2%	0	0.0%	0.0%	25.8%	27.6%
Upper	0	0.0%	0.0%	44.7%	46.2%	2	66.7%	78.9%	49.2%	54.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	2.8%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	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	1	100.0%	100.0%	66.7%	86.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	13.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.1%	1.3%
Moderate	0	0.0%	0.0%	5.9%	3.0%	2	25.0%	14.5%	17.4%	8.2%
Middle	6	75.0%	74.6%	58.9%	64.6%	2	25.0%	19.3%	21.8%	12.9%
Upper	2	25.0%	25.4%	35.2%	32.4%	3	37.5%	8.6%	42.9%	38.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	57.6%	13.9%	39.1%
<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	SMALL BUSINESS									
	By Tract Income					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	11	25.6%	25.6%	19.0%	19.0%	2	25.0%	13.0%	12.7%	12.7%
Middle	23	53.5%	53.5%	42.7%	42.7%	5	62.5%	57.0%	56.1%	56.1%
Upper	9	20.9%	20.9%	38.3%	38.3%	3	37.5%	30.0%	31.2%	31.2%
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%
<i>Total</i>	<i>43</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>43</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
\$1 Million or Less	35	81.4%	81.4%	83.6%	83.6%	41.5%	41.5%	26.5%	26.5%	26.5%
	By Loan Size									
\$100,000 or less	36	83.7%	83.7%	57.6%	57.6%	90.6%	90.6%	31.0%	31.0%	31.0%
\$100,001-\$250,000	6	14.0%	14.0%	31.0%	31.0%	4.7%	4.7%	17.7%	17.7%	17.7%
\$250,001-\$1 Million	1	2.3%	2.3%	11.4%	11.4%	4.7%	4.7%	51.3%	51.3%	51.3%
<i>Total</i>	<i>43</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>43</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>

Originations and Purchases