



**PUBLIC DISCLOSURE**

July 13, 2020

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

The First National Bank of Syracuse  
Charter Number 8114

11 North Main Street  
Syracuse, KS 67878

Office of the Comptroller of the Currency

2959 N. Rock Road, Suite 510  
Wichita, KS 67226

**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, and should not 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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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- A more than reasonable loan-to-deposit ratio, a majority of lending in the Assessment Area (AA), reasonable borrower distribution, and reasonable geographic distribution.
- Adequate responsiveness to community development through community development loans, qualified investments, and community development services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable. The First National Bank of Syracuse's (FNB) average quarterly loan-to-deposit ratio since the last CRA examination was 93 percent. The average quarterly loan-to-deposit ratio is calculated on a bank-wide basis. The bank considers six banks in the AA as primary competitors. The average loan-to-deposit ratio for the peer banks was 76 percent and ranged from 52 percent to 96 percent.

### Lending in Assessment Area

A majority of the bank's loans are inside the AA.

The bank originated and purchased 75 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank level, rather than the AA level. While the dollar amount of small business loans made outside the AA is high, one loan comprised 83 percent of the total dollar amount. This percentage does not include extensions of credit by affiliates, as the bank does not have any affiliates.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	14	70	6	30	20	2,361	28	6,026	72	8,387
Consumer	16	80	4	20	20	79	73	30	27	108
<b>Total</b>	<b>30</b>	<b>75</b>	<b>10</b>	<b>25</b>	<b>40</b>	<b>2,440</b>	<b>29</b>	<b>5,56</b>	<b>71</b>	<b>8,495</b>

## Description of Institution

FNB is a \$375 million institution as of December 31, 2019, with the main office headquartered in Syracuse, KS. FNB is a single-state institution wholly-owned by Legacy Financial, Inc., a one-bank holding company located in Johnson, KS. As of December 31, 2019, Legacy Financial, Inc. had total assets of approximately \$43 million.

In addition to the main office, FNB operates four full-service branches: one in Johnson, KS, approximately 30 miles south; one in Ulysses, KS, approximately 50 miles southeast; and two in Garden City, KS, approximately 50 miles east. All five locations operate deposit-taking and cash-dispensing ATMs. FNB operates three additional cash-dispensing only ATMs: one at Garden City Community College in Garden City, KS; one at the Tyson Foods Plant in Garden City, KS; and one at the Ampride convenience store in Johnson, KS.

FNB offers a variety of loan products. Net loans total \$298 million and represent 80 percent of total assets. As of December 31, 2019, the loan portfolio had the following composition: agricultural, 49 percent; commercial, 38 percent; 1-4 family, 9 percent; consumer loans, 2 percent; and other loans and leases, 2 percent. FNB's tier 1 capital totaled \$37.6 million as of December 31, 2019.

The primary lending products granted since the last Community Reinvestment Act (CRA) examination were commercial loans by dollar amount and consumer loans by number. The bank is not subject to any pending litigation or other factors impeding the bank's ability to meet the credit needs in its AA.

FNB has identified one AA, which consists of Hamilton County, Stanton County, Grant County, and Finney County. The AA complies with regulation and does not arbitrarily exclude any low- or moderate-income tracts.

The bank was rated "Outstanding" at the previous CRA examination, dated June 27, 2017.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test ranges from May 19, 2017 through December 31, 2019. The Community Development test ranges from January 1, 2019 through December 31, 2019. The bank became subject to Intermediate Small Bank status on January 1, 2019.

The OCC evaluated the bank's AA based on its primary lending products during the evaluation period. The primary lending products were commercial loans by dollar amount, and consumer loans by number. We sampled 20 loans for each primary product.

### Selection of Areas for Full-Scope Review

As FNB has offices only in Kansas, the only AA within the state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the

same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank’s overall rating is a blend of the state ratings and where applicable, multistate ratings.

The OCC placed more weight on the commercial lending sample since commercial lending is more of a strategic focus of the bank.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution’s next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Kansas

**CRA rating for the State of Kansas:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- A more than reasonable loan-to-deposit ratio. FNB's average quarterly loan-to-deposit ratio is 93 percent compared with 76 percent for similarly situated banks in the AA.
- A majority of the bank's loans are inside its AA. Seventy-five percent of the bank's loans were made in the AA.
- A reasonable geographic distribution of loans in the AA. FNB demonstrated satisfactory distribution of small business and consumer loans to borrowers located in moderate-income tracts.
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes. FNB demonstrated satisfactory distribution of small business loans and an excellent distribution of consumer loans.
- An adequate response to community development lending, investments, and services.

### Description of Institution's Operations in Kansas

FNB is a full-service bank offering a broad range of commercial, agricultural, real estate, and consumer loan products, as well as a variety of deposit products. The bank's lending focus includes agriculture and commercial lending.

FNB faces strong competition for financial services in the AA from six banks and one farm credit association. The asset sizes for these institutions range from approximately \$62 million to \$20 billion. With 24.4 percent of the deposits in the AA, FNB ranks first in deposit market share. The large financial institution ranking second in the AA with 17.6 percent market share has access to out-of-area loans and deposits and is headquartered in a larger city. The bank considers it to be a close competitor due to their geographic proximity and similar lines of business.

We utilized existing community contacts to assess the credit needs and opportunities in the Syracuse AA. One contact identified housing and working with young entrepreneurs to start small businesses in the area as the primary credit needs of the surrounding communities.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Syracuse AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	16	0.0	25.0	56.3	18.8	0.0
Population by Geography	49,684	0.0	16.2	68.7	15.1	0.0
Housing Units by Geography	18,433	0.0	14.1	71.0	14.9	0.0
Owner-Occupied Units by Geography	11,291	0.0	12.2	69.4	18.4	0.0
Occupied Rental Units by Geography	5,834	0.0	19.1	72.1	8.8	0.0
Vacant Units by Geography	1,308	0.0	8.0	80.4	11.6	0.0
Businesses by Geography	2,764	0.0	19.0	68.9	12.1	0.0
Farms by Geography	438	0.0	3.2	70.3	26.5	0.0
Family Distribution by Income Level	12,525	18.2	19.7	21.3	40.7	0.0
Household Distribution by Income Level	17,125	15.8	17.4	21.1	45.7	0.0
Median Family Income Non-MSAs - KS		\$57,229	Median Housing Value			\$110,172
			Median Gross Rent			\$663
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2019 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Syracuse AA

The Syracuse AA does not have any low-income census tracts but contains four moderate-income census tracts. The U.S. Department of Housing and Urban Development (HUD) declared Stanton and Hamilton Counties as underserved areas during the evaluation period. The 2015 ACS census data shows the population of the Syracuse AA is 49,684. The 2019 HUD median family income is \$62,400. Of the 17,125 households in the Syracuse AA, 23 percent receive social security and 13 percent are below the poverty level. Ten percent of the population is over age 65, and 27 percent of the population consists of civilians not in the workforce. The median housing value is \$110,172 and 61 percent of the housing units are owner-occupied units. The income distribution for families within the AA is 18 percent low income; 20 percent moderate income; 21 percent middle income; and 41 percent upper income. The December 31, 2019, unemployment rates for all four counties in the Syracuse AA are as follows: Finney County, 2 percent; Grant County, 2.5 percent; Hamilton County, 1.8 percent; and Stanton County, 2.5 percent. These rates are below the Kansas rate of 3.1 percent and the national rate of 3.6 percent for the same time period.

The AA has a high concentration in agricultural production and agriculture-related businesses. The primary agricultural products are wheat, corn, milo, cattle, and dairy. Dairies, the Tyson Foods Plant, Transportation Partners and Logistics, LLC, and local schools, county offices, and retailers in the AA help to provide employment diversity.

## **Scope of Evaluation in Kansas**

The bank has one AA, so we performed a full scope review of that AA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS**

### **LENDING TEST**

The bank's performance under the Lending Test is rated Satisfactory.

### **Conclusions for the SYRACUSE AA**

Based on a full-scope review, the bank's lending performance in the state of Kansas is reasonable.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits reasonable geographic distribution of loans in the AA.

#### ***Small Loans to Businesses***

Refer to Table Q in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

FNB demonstrated reasonable distribution of small business loans to borrowers located in moderate-income tracts. While none of the loans in our sample were made in the moderate-income tracts, management provided 29 small business loans made in moderate-income tracts representing 9.1 percent of all commercial loans that were made during the evaluation period. This compares to demographics of 19.0 percent and aggregate data of 16.3 percent. In addition, the opportunity to lend in moderate-income tracts is somewhat limited as there are only 525 businesses located in those tracts. The AA did not include any low-income tracts.

#### ***Consumer Loans***

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

FNB demonstrated reasonable distribution of consumer loans to borrowers located in moderate-income tracts. The bank's distribution of loans in moderate-income tracts of 15 percent was near to demographics of 14.5 percent. The AA did not include any low-income tracts.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

***Small Loans to Businesses***

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

FNB exhibited reasonable distribution with 55 percent of its small business loans made to businesses having revenues less than or equal to \$1 million. This compares to demographics of 71.8 percent and aggregate data of 49.1 percent.

***Consumer Loans***

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

FNB exhibited excellent distribution of consumer loans to low- and moderate-income borrowers. Bank performance showed 35 percent of the consumer loans were made to low-income borrowers compared to 15.8 percent of the households being low-income. Bank performance showed 30 percent of the consumer loans were to moderate-income borrowers compared to 17.4 percent of the households being moderate-income.

**Responses to Complaints**

There were no CRA-related complaints during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the Community Development Test in the state of Kansas is rated satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA.

**Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<b>Community Development Loans</b>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Syracuse	2	100	\$226	100

CD loans demonstrated adequate responsiveness to CD needs and opportunities during the evaluation period. The bank was only an Intermediate Small Bank for one year of the evaluation period, so the bank was only required to collect data for one year in the evaluation period. Management originated two CD loans totaling \$226 thousand during the evaluation period. One loan totaling \$190 thousand supports the local government's revitalization and stabilization of an underserved area and one loan totaling \$36 thousand supports affordable housing.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Syracuse	1	279	2	6	3	75	285	68	0	0
State Wide			1	133	1	25	133	32	0	0
<b>Total</b>	<b>1</b>	<b>279</b>	<b>3</b>	<b>139</b>	<b>4</b>	<b>100</b>	<b>418</b>	<b>100</b>	<b>0</b>	<b>0</b>

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that tracked and recorded by the institution's financial reporting system.

CD investments and donations provided adequate responsiveness to community needs. FNB provided a community development donation/investment that was statewide that could impact the bank's AA. The donation was to a non-profit entity that helps small business owners start and grow successful businesses throughout the state of Kansas. The bank had a prior period investment that had an outstanding balance of \$279 thousand as of December 31, 2019. The investment supports revitalization and stabilization of an underserved area in the AA. Other donations totaled \$6,000 and were used to purchase curriculum for financial literacy in the local schools, with a student population of more than 50 percent eligible for free and reduced lunch programs.

### Extent to Which the Bank Provides Community Development Services

CD services represent adequate responsiveness to CD needs and opportunities in the Syracuse AA. Ten employees provided services to six qualified CD organizations during the evaluation period. The bank does not collect hours of employee service for every activity. The following are examples of some of the CD services provided to organizations in the AA during the evaluation period:

- Bank employees taught financial literacy to K-5 students at five schools in a school district with a student population of more than 50 percent eligible for free and reduced lunch programs. (311 hours)
- One employee provides his financial expertise on the Economic Development Committee.
- Two bank employees provided a "First Time Home Buyer Program" seminar and a "How to Start a Business" seminar which included low-to-moderate-income individuals.

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	05/19/2017 – 12/31/19 Lending Test 01/01/2019 – 12/31/19 CD Test	
<b>Bank Products Reviewed:</b>	Small business and consumer loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Syracuse AA	Full-Scope	Hamilton, Grant, Finney, and Stanton Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: The FNB of Syracuse			
	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
<b>Overall Bank:</b>			
The FNB of Syracuse	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
Kansas	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct 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 the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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.

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-2019</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Syracuse AA	20	2,361	100	613	0.0	0.0	0.0	19.0	0.00	16.3	68.9	70.0	70.1	12.1	30.0	13.5	0.0	0.0	0.0		
<b>Total</b>	<b>20</b>	<b>2,361</b>	<b>100</b>	<b>613</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>19.0</b>	<b>0.00</b>	<b>16.3</b>	<b>68.9</b>	<b>70.0</b>	<b>70.1</b>	<b>12.1</b>	<b>15.0</b>	<b>13.5</b>	<b>0.0</b>	<b>-</b>	<b>0.0</b>		

*Source: 2019 D&B Data; 05/19/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-2019</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Syracuse AA	20	3,845	100	613	71.8	55.0	49.1	7.6	45.0	20.7	0.0		
<b>Total</b>	<b>20</b>	<b>3,845</b>	<b>100</b>	<b>613</b>	<b>71.8</b>	<b>55.0</b>	<b>49.1</b>	<b>7.6</b>	<b>45.0</b>	<b>20.7</b>	<b>0.0</b>		

*Source: 2019 D&B Data; 05/19/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Syracuse AA	20	106	100	0.0	0.0	14.5	15.0	70.3	70	15.2	15.0	0.0	0.0	
<i>Source: 2015 ACS Census; 05/19/2017 - 12/31/2019 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Syracuse AA	20	106	100	15.8	35.0	17.4	30.0	21.1	30	45.7	0.0	0.0	5.0	
<b>Total</b>	<b>20</b>	<b>106</b>	<b>100</b>	<b>15.8</b>	<b>35.0</b>	<b>17.4</b>	<b>30.0</b>	<b>21.1</b>	<b>30.0</b>	<b>45.7</b>	<b>0.0</b>	<b>0.0</b>	<b>5.0</b>	
<i>Source: 2015 ACS Census; 05/19/2017 - 12/31/2019 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														