



PUBLIC DISCLOSURE

October 01, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Upstate National Bank
Charter Number 12018

729 Proctor Avenue
Ogdensburg, NY 13669

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, NY 13057

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

The Lending Test is rated: Needs to Improve.

The primary factors supporting the CRA rating are as follows:

- Upstate National Bank (UNB) originated only five loans in the Watertown-Fort Drum, New York (NY) Metropolitan Statistical Area (MSA) assessment area (AA) and St. Lawrence County Non-MSA AA over the three-year evaluation. The loans represent only three percent of the number and 0.09 percent of the dollar amount of all UNB's loan originations over the three-year period.
- The bank had a very poor distribution of loans to borrowers of different income levels in the Watertown-Fort Drum, NY MSA AA and in the St. Lawrence County Non-MSA AA.
- The bank had a very poor distribution of loans among census tracts of different income designations in the Watertown-Fort Drum, NY MSA AA and in the St. Lawrence County Non-MSA AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

Description of Institution

UNB is a \$120 million, single state, community bank headquartered in Ogdensburg, NY. While chartered in Ogdensburg, all administrative and operational activity is handled in Rochester, NY. UNB is majority owned by K&Z Company, LLC. The bank operates three full service branches located in the city of Rochester, NY, which is part of the Rochester, NY MSA, the town of Philadelphia, NY, which is located in the Watertown-Fort Drum, NY MSA, and the town of Ogdensburg, NY, which is located in the Non-MSA portion of NY. UNB's Rochester, NY MSA AA includes all census tracts in Monroe County, which includes the city of Rochester. The bank's Watertown-Fort Drum, NY MSA AA includes six census tracts in Jefferson County that surround the branch in the town of Philadelphia. The Non-MSA AA covers 18 census tracts in St. Lawrence County surrounding the Ogdensburg branch. The AAs meet the requirements of the regulation, and do not arbitrarily exclude any low- or moderate-income census tracts or reflect illegal discrimination.

The bank has one automated teller machine (ATM), which is located at the Rochester branch and can only be utilized during the buildings hours of operation (7:00 a.m. to 7:00 p.m.). Banking hours are 9:00 a.m. to 4:00 p.m. at each branch location. However, the teller window at the Rochester branch is only open from 10:00 a.m. to 2:00 p.m. The Ogdensburg branch is the only location with a drive-thru window, which opens 45 minutes prior to the branch. Since the prior CRA evaluation, there were no branch openings or closings, and the bank was not a part of a merger or acquisition.

UNB offers traditional products and services, with a primary focus on commercial banking products. Banking products advertised on the bank's website consist solely of commercial products and include commercial and industrial loans, lines of credit, term loans, revolving line facilities, commercial real estate (investor) mortgages, commercial real estate (owner-occupied) mortgages, and short-term and bridge financing. The bank does not advertise consumer products on their website but does originate them. UNB is not licensed to originate residential mortgage loans, and therefore, any one- to four- family residential mortgage loans on the balance sheet are loan purchases. All lending officers are located at the Rochester branch. Consumer loan applications are accepted at all branches, but are sent to Rochester for underwriting and approval. Commercial loan applications are only accepted at the Rochester branch. UNB offers online banking services for retail customers. The service allows customers to view deposit account balances, transfer balances between UNB accounts, and includes a bill pay feature.

UNB sources all of its deposits from its three AAs. As of December 31, 2017, UNB's deposit base totaled \$83.3 million. The Federal Deposit Insurance Corporation (FDIC) market share reports indicate the majority of the bank's \$102 million in deposits as of June 30, 2017, stem from the Rochester, NY MSA at \$80.4 million, or approximately 79 percent of deposits. The Watertown-Fort Drum, NY MSA and St. Lawrence County Non-MSA AAs attribute to \$15.7 million (15.4 percent) and \$5.9 million (5.7 percent) of the deposit base, respectively. UNB competes with a number of other community,

regional, and large bank financial institutions for deposit market share. UNB holds less than a one percent deposit market share of FDIC insured banks serving each of the bank's AA's. Major competitors in Monroe County include M&T Bank, JPMorgan Chase, and KeyBank. Major competitors in Jefferson and St. Lawrence Counties include Watertown Savings Bank and Community Bank, N.A.

As of December 31, 2017, UNB's balance sheet included \$92.6 million or 77 percent of total assets in gross loans. Management continues to focus strategic efforts in commercial loan growth, primarily commercial real estate, as evidenced by the bank's significant concentration in commercial real estate loans at 433 percent of total capital. The loan mix is consistent with management's business strategy and consists of the following: \$64.5 million (69.7 percent) commercial real estate, \$20.6 million (22.3 percent) residential real estate, \$6.3 million (6.8 percent) commercial and industrial, and \$1.2 million (1.2 percent) in other loans. Loans classified as residential real estate on the call report are either commercial related loans secured by one- to four- family real estate or residential real estate loan purchases.

UNB has no legal, financial or other impediments that would hinder its ability to help meet the credit needs in its assessment area. UNB's last CRA evaluation was dated December 2, 2013, at which time the bank's performance was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation covered the time period from January 1, 2014 through December 31, 2017. We reviewed the primary loan product for each AA, which was small business loans in the Rochester, NY MSA AA and consumer loans in the Watertown-Fort Drum, NY and St. Lawrence County Non-MSA AAs. The assessment covered a three year period from January 1, 2015 through December 31, 2017, which is representative of the entire evaluation period. Our assessment of small business loans was based on a sample of 78 loan originations and purchases, and our assessment of consumer loans was based on the only five loans made over the three years we reviewed.

Data Integrity

We verified the accuracy of all information used in the lending evaluation, which includes the 78 small business loans and the five consumer loans discussed earlier.

Selection of Areas for Full-Scope Review

We conducted a full-scope review of all of the bank's AAs. Refer to Appendix A for more information regarding the evaluation scope.

Ratings

The bank's overall rating is based on the full-scope reviews of all three of the bank's AAs. The assessment for borrower and geographic distribution measures the bank's performance against performance by other lenders in the AA and on performance against AA demographics.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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 Consumer Financial Protection Bureau, 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.

Conclusions with Respect to Performance Tests

We based our evaluation of UNB's performance under the lending test, considering all three of the bank's AAs.

LENDING TEST

The bank's performance under the lending test needs to improve. While UNB made a majority of its loans in the AAs, and had good performance in the Rochester, NY MSA AA, its performance in the Watertown-Fort Drum, NY MSA and St. Lawrence County Non-MSA AAs was very poor. The bank has approximately 21 percent of its deposits in these two AAs, but made very few loans in them. UNB originated a combined five loans or 3.0 percent of total loan originations by number and 0.09 percent of total loan originations by dollar amount, in these two AAs over the three-year period. The bank did not market loan products in the AAs, which significantly contributed to the very low level of loan originations.

Loan-to-Deposit Ratio

UNB's average loan-to-deposit ratio during the evaluation period was reasonable. The bank's average quarterly loan-to-deposit ratio since the prior CRA evaluation through December 31, 2017, was 90.5 percent. In comparison, five similarly situated institutions had average quarterly loan-to-deposit ratios ranging from 56.4 percent to 116.4 percent during the same period.

Lending in Assessment Area

A majority of the bank's business and consumer loans originated during the evaluation period were inside the bank's AA. Based on our sampling of 83 business and consumer loans, UNB originated 65.1 percent and 66.0 percent of its loans in its AA, by number and dollar amount, respectively. Refer to the table below for further detail.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Business & Consumer	54	65.1	29	34.9	83	26,246	66.0	13,532	34.0	39,778

Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data
Due to rounding, totals may not equal 100.0

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

While UNB has a reasonable distribution of loans to businesses of different sizes in the Rochester, NY MSA AA, the distribution of consumer loans to low- and moderate-income borrowers in the Watertown-Fort Drum, NY MSA AA and the St. Lawrence County Non-MSA AA was very poor.

UNB originated five consumer loans in the Watertown-Fort Drum, NY AA over the evaluation period which equates to 3.0 percent of all loans originated throughout that period. Of these loans, two were made to moderate-income borrowers in 2017. There were no other loans made to low- or moderate-income borrowers.

The bank made no loans in the St. Lawrence County Non-MSA AA.

In the Rochester, NY MSA AA, the percentage of loans to small businesses was similar to the percentage of small businesses in the AA in 2015 and 2016. In 2017, the percentage of loans to small businesses fell, but the percentage remained within a reasonable range to the percentage of small businesses. The bank's portion of small business loans made to small size businesses exceeded the average for peer lenders in 2016.

Please refer to Appendix C for further detail.

Geographic Distribution of Loans

While UNB had an excellent distribution of loans among census tracts of different incomes in the Rochester, NY MSA AA, the distribution of loans in the Watertown-Fort Drum, NY MSA AA and the St. Lawrence County Non-MSA AA was very poor.

UNB's geographic distribution of loans reflects very poor distribution among census tracts of different income designations in the Watertown-Fort Drum, NY MSA AA. In 2015 and 2016, the bank's AA did not include any low-income census tracts and included two moderate-income census tracts. In 2017, the AA only included one moderate-income census tract as a result of the 2015 American Community Survey (ACS) Census update of the 2010 census. The bank did not originate any loans to low- or moderate-income census tracts.

As stated earlier, the bank made no loans in the St. Lawrence County Non-MSA AA.

UNB's geographic distribution of loans reflects excellent distribution among census tracts of different income designations in the Rochester, NY MSA AA. In 2015 and 2016, the AA included 40 low-income census tracts and 30 moderate-income census tracts. In 2017, there were an additional four low-income tracts and one less moderate-income tract as a result of the 2015 ACS Census update of the 2010 census. The bank's percentage of business loans originated to businesses located in low-income tracts was over three times the percentage of AA businesses located in low-income

tracts in 2015 and 2016, and over four times the percentage in 2017. In 2015 and 2016, the percentage of business loans originated to businesses in moderate-income tracts slightly exceeded the percentage of businesses located in moderate-income tracts in the AA. However, the bank did not lend to any businesses in moderate-income tracts in 2017. The bank's portion of loans made in low- and moderate-income census tracts significantly exceeded the average for peer lenders in 2016.

Please refer to Appendix D for further detail.

Responses to Complaints

UNB did not receive any CRA related complaints during the evaluation period.

Appendix A: Scope of Examination

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 metropolitan and nonmetropolitan areas 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”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/15 to 12/31/17) Investment and Service Tests and CD Loans: Not Applicable	
Financial Institution		Products Reviewed
The Upstate National Bank (UNB) Ogdensburg, NY		Small Business & Consumer Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Rochester, NY MSA Watertown-Fort Drum, NY MSA St. Lawrence County Non-MSA	Full-Scope Full-Scope Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

Rochester, NY MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Rochester, NY MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	192	20.8	15.6	37.0	25.0	1.6
Population by Geography	744,344	11.9	13.0	43.4	31.4	0.3
Housing Units by Geography	318,793	13.2	14.3	43.8	28.8	0.0
Owner-Occupied Units by Geography	194,272	4.6	10.4	48.2	36.7	0.0
Occupied Rental Units by Geography	96,923	25.0	19.8	38.9	16.3	0.0
Vacant Units by Geography	27,598	32.2	21.8	29.5	16.5	0.0
Businesses by Geography	39,257	13.3	10.0	42.6	33.9	0.3
Farms by Geography	909	4.5	4.3	46.8	44.4	0.0
Family Distribution by Income Level	182,823	21.0	16.7	21.2	41.0	0.0
Household Distribution by Income Level	291,195	24.9	16.1	17.5	41.5	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$64,013	Median Housing Value			\$130,634
			Median Gross Rent			\$760
			Families Below Poverty Level			9.7%
<i>Source: 2010 U.S. Census and 2016 D&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>						

Demographic Information of the Assessment Area						
Assessment Area: Rochester, NY MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	193	22.8	15.0	32.1	27.5	2.6
Population by Geography	749,356	13.0	13.5	37.6	35.2	0.8
Housing Units by Geography	323,313	13.9	14.3	38.6	33.1	0.1
Owner-Occupied Units by Geography	192,326	5.1	10.4	42.4	42.1	0.0
Occupied Rental Units by Geography	107,438	25.9	20.4	33.3	20.3	0.2
Vacant Units by Geography	23,549	31.6	18.8	31.3	18.3	0.1
Businesses by Geography	39,385	12.9	11.6	37.6	37.6	0.3
Farms by Geography	928	3.8	6.8	45.2	44.2	0.1
Family Distribution by Income Level	182,181	22.0	16.3	19.3	42.3	0.0
Household Distribution by Income Level	299,764	25.0	15.7	16.9	42.4	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$67,757	Median Housing Value			\$132,345
			Median Gross Rent			\$827
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS Census and 2017 D&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>						

The Rochester, NY MSA is a six county MSA, which includes Livingston, Monroe, Ontario, Orleans, and Wayne Counties. UNB's AA consists of all census tracts within Monroe County, which includes the City of Rochester, the third largest city in New York State behind New York City and Buffalo. The bank's AA excludes all census tracts located in the other counties of the MSA. In 2015 and 2016, the AA had 192 census tracts and included 40 low-income tracts (20.8 percent), 30 moderate-income tracts (15.6 percent), 71 middle-income tracts (37.0 percent), 48 upper-income tracts (25.0 percent), and three unknown-income tracts (1.6 percent). The three unknown tracts are an airport, university, and golf course. The 2015 ACS Census updated the 2010 census, resulting in changes to the classification of several tracts, and added one additional tract to Monroe County. As a result of the update, there are now 193 census tracts in the AA, and it includes 44 low-income tracts (22.8 percent), 29 moderate-income tracts (15.0 percent), 62 middle-income tracts (32.1 percent), 53 upper-income tracts (27.5 percent), and five unknown-income tracts (2.6 percent). The two additional unknown-income tracts are a college and a lake. There were no census tracts classified as distressed or underserved in 2015, 2016, or 2017, according to the FFIEC's list of Distressed or Underserved Tracts.

As of 2010, the AA had a total population of 744,344 people living in 291,195 households with 182,823 families. There were 318,793 housing units, with 60.9 percent owner-occupied, 30.4 percent renter-occupied, and 8.7 percent vacant. The weighted average median housing value was \$130,634 and the average age of a home was 55 years. Based on 2010 census data, approximately 13.4 percent of households in the AA had incomes below the poverty line. The 2015 ACS changes, that took effect in 2017, indicate the population increased to 749,356 and households increased to 299,764, while the number of families declined slightly to 182,181. The weighted average median housing value increased to \$132,345 and the average age was unchanged. The number of households with incomes below the poverty line increased to 14.1 percent.

Businesses in the AA are prevalent. In 2015, Dun & Bradstreet (D&B) reported a total of 42,830 business located in the AA. The majority of the businesses in the AA, 76.4 percent, reported revenues of \$1 million or less, with 6.7 percent reporting revenues more than \$1 million, and 17.0 percent not reporting revenues. The primary industry sectors supported by businesses in the AA were services, retail trade, and construction at 52.4, 14.1, and 7.2 percent, respectively. Businesses generally had a small number of employees, with 68.6 percent of businesses reporting between one and four employees and 9.0 percent reporting between five and nine employees. In 2016, D&B reported a decline in the number of business located in the AA, dropping to 39,257, as a result in a reduction in the number of businesses reporting revenues of \$1 million or less and those not reporting revenue. Approximately 80.7 percent of businesses in the AA reported revenues of \$1 million or less, while 7.7 percent reported revenues greater than \$1 million and 11.6 percent did not report revenue throughout 2016. The number of businesses and percentages of reported revenues remained stable from 2016 through 2017.

As of June 30, 2017, the FDIC reported UNB holding a 0.4 percent deposit market share, ranking it fourteenth among 20 institutions within the Rochester, NY MSA. While the bank's market share within the MSA is low, it has remained stable since the prior evaluation. The bank sources a majority of its deposit base from the area at approximately 79 percent of its total deposits. M&T Bank, JP Morgan Chase, KeyBank, and Canandaigua National Bank hold the majority of the market share within the MSA at 22.5 percent, 14.6 percent, 13.5 percent, and 11.4 percent, respectively.

Competition for business loans in the AA is significant, as are lending opportunities. Based on peer data from banks who submit CRA registers, there is demand for business loans within Monroe County. In 2015, there were 11,311 small business loans totaling \$586 million originated by 70 different lenders within Monroe County. The average loan size originated throughout 2015 across all lenders was \$52 thousand. Top small business lenders in the AA by number of loan originations were American Express, Chase, and Capital One, and by dollar volume were M&T Bank, Canandaigua National Bank, and Five Star Bank. Small business loan originations by number and dollar remained stable throughout 2016 at 11,744 and \$591 million, respectively; however, the number of lenders originating loans in the AA increased significantly by 29 percent to 90. Peer data for 2017 was not available at the time of the evaluation.

The unemployment rate in Monroe County was 5.0 percent as of December 31, 2017, slightly higher than the New York State unemployment rate of 4.7 percent at the same date. Throughout 2017, unemployment ranged from a high of 5.4 percent in February to a low of 4.6 percent in April, before returning to 5.0 percent at year-end. Overall, the unemployment rate has been trending downward over the past decade, since its peak of 8.7 percent in February 2010, showing an improvement in the economic condition of the county. In May 2018, unemployment dropped to 4.1 percent, its lowest point since the Great Recession. Major employers in Monroe County include University of Rochester, Rochester Regional Health, Wegmans Food Markets, Paychex, and Rochester Institute of Technology.

We contacted a local community development coalition with representatives from several organizations serving Monroe County, including the city of Rochester. The organizations are generally concerned with affordable and decent housing for people of low- and moderate-income (LMI); LMI neighborhood revitalization and stabilization; community services for LMI people; and economic development through small business lending. The contact indicated there is a significant need for affordable mortgage, small size business, and auto loans in the city of Rochester. There is also a significant need for community development loans, investments and services in the city, with many opportunities for banks. Opportunities include the need for financing that supports affordable housing for LMI borrowers (owner-occupied and rental), small size business loans for new and smaller businesses, auto financing for LMI, overdraft free checking accounts for ACH transactions, and quality credit counseling. In addition, there are several opportunities related to the revitalization and stabilization of LMI neighborhoods in the city of Rochester.

Watertown-Fort Drum, NY MSA AA

Demographic Information of the Assessment Area						
Assessment Area: Watertown-Fort Drum, NY MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	33.3	50.0	0.0	16.7
Population by Geography	29,480	0.0	46.6	53.4	0.0	0.1
Housing Units by Geography	13,195	0.0	30.5	69.5	0.0	0.0
Owner-Occupied Units by Geography	3,541	0.0	1.4	98.6	0.0	0.0
Occupied Rental Units by Geography	6,566	0.0	59.6	40.4	0.0	0.0
Vacant Units by Geography	3,088	0.0	2.1	97.9	0.0	0.0
Businesses by Geography	745	0.0	13.8	86.0	0.0	0.1
Farms by Geography	67	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	7,863	26.8	23.2	19.6	30.4	0.0
Household Distribution by Income Level	10,107	23.2	20.1	21.3	35.4	0.0
Median Family Income MSA - 48060 Watertown-Fort Drum, NY MSA		\$51,834	Median Housing Value			\$110,155
			Median Gross Rent			\$1,058
			Families Below Poverty Level			16.3%
<i>Source: 2010 U.S. Census and 2016 D&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>						

Demographic Information of the Assessment Area						
Assessment Area: Watertown-Fort Drum, NY MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	66.7	0.0	16.7
Population by Geography	30,194	0.0	23.3	76.4	0.0	0.3
Housing Units by Geography	13,019	0.0	15.9	84.0	0.0	0.1
Owner-Occupied Units by Geography	3,766	0.0	0.4	99.6	0.0	0.0
Occupied Rental Units by Geography	6,135	0.0	31.9	68.0	0.0	0.1
Vacant Units by Geography	3,188	0.0	3.2	96.8	0.0	0.0
Businesses by Geography	722	0.0	3.5	96.4	0.0	0.1
Farms by Geography	66	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	7,498	21.4	24.0	23.9	30.7	0.0
Household Distribution by Income Level	9,901	20.2	19.6	25.2	35.0	0.0
Median Family Income MSA - 48060 Watertown-Fort Drum, NY MSA		\$57,300	Median Housing Value			\$132,300
			Median Gross Rent			\$1,231
			Families Below Poverty Level			9.0%
<i>Source: 2015 ACS Census and 2017 D&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>						

The Watertown-Fort Drum, NY MSA is a one county MSA, exclusively made up of Jefferson County. UNB's AA consists of six contiguous census tracts surrounding the Philadelphia branch, all of which are located in northern Jefferson County, and adjoin the census tracts included within the bank's St. Lawrence County Non-MSA AA. The remaining 20 census tracts that make up the Watertown-Fort Drum, NY MSA are excluded from the bank's AA. In 2015 and 2016, the AA had two moderate-income tracts (33.3 percent), three middle-income tracts (50.0 percent), and one unknown income tract (16.7 percent). The unknown income tract is associated with the Fort Drum military base that is located in Jefferson County, and includes parts of the towns of Antwerp, Leray, Philadelphia, and Wilna. The 2015 ACS Census updated the 2010 census and changed the classification of one tract from moderate- to middle-income in 2017. As a result, there is now only one moderate-income tract (16.7 percent) located in the bank's AA. There were no census tracts classified as distressed or underserved in 2015, 2016, or 2017, according to the FFIEC's list of Distressed or Underserved Tracts.

As of 2010, the AA had a total population of 29,480 people living in 10,107 households. There were 13,195 housing units located in the AA, with 28.6 percent of them owner-occupied and 49.8 percent renter-occupied. Additionally 3,088 or 23.4 percent of housing units were vacant. The weighted average median housing value was \$110,155 and the weighted average age of a home was 40 years. The distribution of households by income level is 23.2 percent low-income, 20.1 percent moderate-income, 21.3 percent middle-income, and 35.4 percent upper-income. The number of households with incomes below the poverty line is 16.4 percent. The AA had 7,863 families with a MFI of \$51,834 in 2015 and 2016. The distribution of families by income level is 26.8 percent low-income, 23.2 percent moderate-income, 19.6 percent middle-income, and 35.4 percent upper-income.

Based on the changes made by the ACS, as of 2017, the AA had a total population of 30,194 people living in 9,901 households. There were 13,019 housing units located in the AA, with 28.9 percent of them owner-occupied and 47.1 percent renter-occupied. Additionally 3,118 or 24.0 percent of housing units were vacant. The weighted average median housing value was \$132,300, and the weighted average age of a home was 35 years. The distribution of households by income level is 20.2 percent low-income, 19.6 percent moderate-income, 25.2 percent middle-income, and 35.0 percent upper-income. The number of households with incomes below the poverty line is 12.6 percent. The AA had 7,498 families with a MFI of \$57,300 in 2017. The distribution of families by income level is 21.4 percent low-income, 24.0 percent moderate-income, 23.9 percent middle-income, and 30.7 percent upper-income.

As of June 30, 2017, the FDIC reported UNB holding a 1.0 percent deposit market share, ranking ninth among ten institutions within the Watertown-Fort Drum, NY MSA. While the bank's market share within the MSA is low, it has remained stable since the prior evaluation, and the bank sources approximately 15.4 percent of its deposit base from the area. Watertown Savings Bank, Community Bank, and KeyBank hold the

majority of the market share within the MSA at 33.3 percent, 28.7 percent, and 13.8 percent, respectively.

Lending opportunities in the area are prevalent across several product types. Based on peer data from institutions who submit CRA and HMDA registers, there is demand for both commercial and mortgage lending within the Watertown-Fort Drum, NY MSA. In 2016, there were 1,594 small business loans totaling \$82.4 million, originated by 52 different lenders within the MSA. The average loan size originated throughout the year across all lenders was \$52 thousand. Top small business lenders in the AA by number of originations include Watertown Savings Bank, American Express, Synchrony Bank, and Community Bank, N.A. Mortgage lending is less prevalent than small business lending in the area, but is still in demand. In 2017, there were 389 mortgages totaling \$40.7 million, originated by 60 different lenders within the MSA. The average loan size originated throughout the year across all lenders was \$134 thousand. Top mortgage lenders include Community Bank, N.A., AmeriCu Credit Union, Carthage Federal Savings and Loan Association, and Gouverneur Savings and Loan Association. While lending opportunities are available, UNB has only originated five consumer loans in the AA over the course of the evaluation period. No business or mortgage loans were originated or purchased.

The unemployment rate in Jefferson County was 7.3 percent as of December 31, 2017, much higher than the New York State unemployment rate of 4.7 percent at the same date. However, unemployment in Jefferson County is seasonal. In February 2017, unemployment in the county was at a high point of 8.4 percent. Following the peak in February, the unemployment rate began to trend downward, reaching its low point in June 2017 at 5.5 percent. Unemployment remained stable between 5.5 and 5.6 percent through October 2017 before trending back upwards for the remainder of the year. This pattern is consistent with historic trends. Overall, the unemployment rate has trended downward over the past decade, since its peak of 12.1 percent in February 2012. The July 2018 unemployment rate was 4.8 percent, its lowest point since October 2007. Major employers in Jefferson County are predominately concentrated in the government and healthcare industries and include Fort Drum, Samaritan Medical Center, New York State, Jefferson County, Convergys, and Jefferson Rehabilitation Center, according to the Jefferson County Economic Development Agency.

We contacted a local community development organization that serves the Adirondack region and the North Country, including Jefferson and St. Lawrence Counties. The organization's focus is to provide a foundation for business development through developing projects and partnerships to support small and regional businesses and bring investment to rural locations. The organization noted much of the region's economic activity derives from the Fort Drum military base located in Jefferson County, and there is a need to attract direct investment to create jobs as the region lacks the necessary venture capital. The contact stated that banks can become members of the organization, with membership fees helping the organization achieve its goals.

St. Lawrence County Non-MSA AA

Demographic Information of the Assessment Area						
Assessment Area: St. Lawrence County Non-MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	5.6	11.1	61.1	16.7	5.6
Population by Geography	67,237	3.2	10.8	67.5	16.3	2.2
Housing Units by Geography	28,108	0.2	12.8	74.9	12.2	0.0
Owner-Occupied Units by Geography	16,103	0.0	10.2	78.2	11.5	0.0
Occupied Rental Units by Geography	7,004	0.6	24.7	57.3	17.4	0.0
Vacant Units by Geography	5,001	0.0	4.2	88.7	7.1	0.0
Businesses by Geography	2,969	0.9	16.1	60.1	22.3	0.6
Farms by Geography	236	0.0	2.1	85.6	12.3	0.0
Family Distribution by Income Level	15,224	22.1	18.0	21.0	38.9	0.0
Household Distribution by Income Level	23,107	26.3	16.7	17.9	39.1	0.0
Median Family Income Non-MSAs - NY		\$54,386	Median Housing Value			\$83,005
			Median Gross Rent			\$619
			Families Below Poverty Level			12.3%
<i>Source: 2010 U.S. Census and 2016 D&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>						

Demographic Information of the Assessment Area						
Assessment Area: St. Lawrence County Non-MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	11.1	55.6	16.7	16.7
Population by Geography	67,813	0.0	13.6	58.0	19.4	9.0
Housing Units by Geography	28,646	0.0	13.3	66.4	20.2	0.1
Owner-Occupied Units by Geography	15,969	0.0	12.8	65.2	22.0	0.1
Occupied Rental Units by Geography	7,146	0.0	18.4	58.3	22.9	0.4
Vacant Units by Geography	5,531	0.0	7.8	80.5	11.6	0.1
Businesses by Geography	2,951	0.0	13.8	54.6	29.1	2.5
Farms by Geography	226	0.0	9.3	76.1	14.6	0.0
Family Distribution by Income Level	14,404	23.1	17.4	19.8	39.7	0.0
Household Distribution by Income Level	23,115	27.4	15.5	16.4	40.7	0.0
Median Family Income Non-MSAs - NY		\$59,570	Median Housing Value			\$92,501
			Median Gross Rent			\$697
			Families Below Poverty Level			14.5%
<i>Source: 2015 ACS Census and 2017 D&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>						

UNB's Non-MSA AA consists of 18 census tracts located in St. Lawrence County surrounding the Ogdensburg branch. The census tracts included in the AA are located in the western part of the county that run parallel to the St. Lawrence River, and adjoin to the census tracts that make up the bank's Watertown-Fort Drum, NY MSA AA. In 2015 and 2016, the AA had one low-income tract (5.6 percent), two moderate-income tracts (11.1 percent), eleven middle-income tracts (61.1 percent), three upper-income tracts (16.7 percent), and one unknown income tract (5.6 percent). The unknown income tract is associated with St. Lawrence University. The 2015 ACS Census updated the 2010 census and changed the classification of seven census tracts. As a result, there are now no low-income tracts, two moderate-income tracts (11.1 percent), 10 middle-income tracts (55.6 percent), three upper-income tracts (16.7 percent), and three unknown income tracts (16.7 percent) located in the bank's AA. The new unknown income tracts are associated with Clarkson University and the State University of New York (SUNY) Potsdam. There were 11 distressed or underserved census tracts in 2015 and 2016; however, there were no census tracts classified as distressed or underserved in 2017, according to the FFIEC's list of Distressed or Underserved Tracts.

As of 2010, the AA had a total population of 67,237 people living in 23,107 households. There were 28,018 housing units located in the AA, with 57.3 percent of them owner-occupied and 24.9 percent renter-occupied. In addition, 5,001 or 17.79 percent of housing units were vacant. The weighted average median housing value was \$83,005 and the weighted average age of a home was 58 years. The distribution of households by income level is 26.3 percent low-income, 16.7 percent moderate-income, 17.9 percent middle-income, and 39.1 percent upper-income. The number of households with incomes below the poverty line is 16.8 percent. The AA had 15,224 families with a MFI of \$54,386 in 2015 and 2016. The distribution of families by income level is 22.1 percent low-income, 18.0 percent moderate-income, 21.0 percent middle-income, and 38.9 percent upper-income.

Based on the changes made by the ACS, as of 2017, the AA had a total population of 67,813 people living in 23,115 households. There were 28,646 housing units located in the AA, with 55.8 percent of them owner-occupied and 25.0 percent renter-occupied. In addition 5,531 or 19.3 percent of housing units were vacant. The weighted average median housing value was \$92,501 and the weighted average age of a home was 58 years. The distribution of households by income level is 27.4 percent low-income, 15.5 percent moderate-income, 16.4 percent middle-income, and 40.7 percent upper-income. The number of households with incomes below the poverty line is 18.7 percent. The AA has 14,404 families with a MFI of \$59,570 in 2017. The distribution of families by income level is 23.1 percent low-income, 17.5 percent moderate-income, 19.8 percent middle-income, and 39.7 percent upper-income.

As of June 30, 2017, UNB's deposit market share was ranked last of eight depository institutions, holding a minimal 0.5 percent market share of deposits in the county, according to the FDIC. While the bank holds a minimal market share, UNB's market deposit remained stable over the evaluation period at 5.7 percent of deposits.

Lending opportunities in the area are prevalent across several product types. Based on peer data from institutions who submit CRA and HMDA registers, there is demand for both commercial and mortgage lending within St. Lawrence County. In 2016, there were 1,002 small business loans totaling \$68.6 million, originated by 53 different lenders within the county. The average loan size originated throughout the year across all lenders was \$68 thousand. Top small business lenders in the AA by number of loan originations include Community Bank, N.A, American Express, Synchrony Bank, and Capital One. Mortgage lending is less prevalent than small business lending in the area but is still in demand. In 2017, there were 738 mortgages totaling \$58.4 million, originated by 66 different lenders within the MSA. The average loan size originated throughout the year across all lenders was \$79 thousand. Top mortgage lenders include Community Bank, N.A, Gouverneur Savings and Loan Association, Quicken Loans, and KeyBank. While lending opportunities are available, UNB has not originated or purchased any loans in the AA over the course of the evaluation period.

The unemployment rate in St. Lawrence County was 6.7 percent as of December 31, 2017, higher than the New York State unemployment rate of 4.7 percent at the same date. Unemployment in St. Lawrence County is seasonal. In January 2017, unemployment was at a high point of 7.8 percent, reaching its low point of 5.4 percent in October 2017, before trending upward again. This pattern is consistent with historic trends. Overall, the unemployment rate has trended downward since the Great Recession at its peak of 11.9 percent in January 2012. The May 2018 unemployment rate was 5.3 percent, its lowest point since October 2007. Major employers in the county include St. Lawrence County, St. Lawrence-Lewis BOCES, Claxton-Hepburn Medical Center, Canton-Potsdam Hospital, and the three colleges located in the Canton and Potsdam areas. According to the December 2015 New York Power Authority Report, 40 percent of the county's gross domestic product comes from non-tradable sectors as the largest employers are the federal, state, and local governments and healthcare providers. As of 2013, the same report notes small business closures were outpacing opening by 30 percent.

The economy is stable when compared against much higher levels of unemployment that occurred during the economic crisis. However, the county economic development agency considers the economy stagnant, as unemployment remains higher than the state, and highly dependent on the government and the healthcare industry. The St. Lawrence County Industrial Development Agency recently issued a five-year plan to reverse the stagnation. The plan focuses on private sector development, and includes a discussion of improvements to housing stock and neighborhoods.

We contacted a local community development organization that serves all of St. Lawrence County. The organization's focus is helping LMI homebuyers to qualify for mortgages at financial institutions serving the county through financial education, down payment, and closing cost grants. The contact indicated there is a need for both down payment assistance and rehabilitation assistance in order for first time home buyers to be able to afford a home, due to increased housing prices attributable to Fort Drum and the age of homes in the area.

Appendix C: Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Rochester, NY MSA

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Rochester, NY MSA	32	20,558	100.0	11,629	78.4	75.0	42.8	7.2	25.0	14.4	0.0
Total	32	20,558	100.00	11,629	78.4	75.0	42.8	7.2	25.0	14.4	0.0
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0</i>											

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Rochester, NY MSA	17	5,634	100.00	--	80.5	58.8	--	7.8	41.2	11.7	0.0
Total	17	5,634	100.00	--	80.5	58.8	--	7.8	41.2	11.7	0.0
<i>Source: 2015 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; No aggregate peer data available for 2017 Due to rounding, totals may not equal 100.0</i>											

Watertown-Fort Drum, NY MSA

Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-16	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Watertown-Fort Drum, NY MSA	2	33	100.0	23.2	0.0	20.1	0.0	21.3	50.0	35.4	0.0	0.0	50.0	
Total	2	33	100.0	23.2	0.0	20.1	0.0	21.3	50.0	35.4	0.0	0.0	50.0	

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Watertown-Fort Drum, NY MSA	3	22	100.0	20.2	0.0	19.6	66.7	25.2	0.0	35.0	33.3	0.0	0.0	
Total	3	22	100.0	20.2	0.0	19.6	66.7	25.2	0.0	35.0	33.3	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.
Due to rounding, totals may not equal 100.0

St. Lawrence County Non-MSA

Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-16	
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	
Non-MSA	0	0	100.0	26.3	0.0	16.7	0	17.9	0.0	39.1	0.0	0.0	0.0	
Total	0	0	100.0	26.3	0.0	16.7	0.0	17.9	0.0	39.1	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0

Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017	
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	
Non-MSA	0	0	100.0	27.4	0.0	15.5	0.0	16.4	0.0	40.7	0.0	0.0	0.0	
Total	0	0	100.0	27.4	0.0	15.5	0.0	16.4	0.0	40.7	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.
Due to rounding, totals may not equal 100.0

Appendix D: Geographic Distribution of Loans

Rochester, NY MSA

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Rochester, NY MSA	24	16,739	100.0	11,629	13.1	45.8	10.8	9.9	12.5	8.0	42.7	20.8	43.2	34.1	20.8	37.8	0.3	0.0	0.1
Total	24	16,739	100.0	11,629	13.1	45.8	10.8	9.9	12.5	8.0	42.7	20.8	43.2	34.1	20.8	37.8	0.3	0.0	0.1

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Rochester, NY MSA	10	2,065	100.0	--	13.0	60.0	--	9.8	0.0	--	42.7	40.0	--	34.3	0.0	--	0.2	0.0	--
Total	10	2,065	100.0	--	13.0	60.0	--	9.8	0.0	--	42.7	40.0	--	34.3	0.0	--	0.2	0.0	--

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, No aggregate peer data available for 2017
Due to rounding, totals may not equal 100.0

Watertown-Fort Drum, NY MSA

Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
Watertown, NY MSA	2	33	100.0	0.0	0.0	39.2	0.0	60.8	100.0	0.0	0.0	0.0	0.0	
<i>Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017	
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	
Watertown, NY MSA	3	22	100.0	0.0	0.0	19.9	0.0	80.0	100.0	0.0	0.0	0.1	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data. Due to rounding, totals may not equal 100.0</i>														

St. Lawrence County Non-MSA

Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
Non-MSA	0	0	100.0	0.2	0.0	14.6	0.0	71.9	0.0	13.3	0.0	0.0	0.0	
<i>Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017	
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	
Non-MSA	0	0	100.0	0.0	0.0	14.5	0.0	63.1	0.0	22.2	0.0	0.1	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data. Due to rounding, totals may not equal 100.0</i>														