



PUBLIC DISCLOSURE

January 21, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sterling National Bank
Charter Number 25075

400 Rella Boulevard
Montebello, NY 10901-4243

Office of the Comptroller of the Currency

343 Thornall Street, Suite 610
Edison, NJ 08837

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 following table indicates the performance level of **Sterling National Bank (SNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The lending levels reflect adequate responsiveness to assessment area (AA) credit needs.
- A substantial majority (93%) of the home mortgage loans, small loans to businesses and farms originated by SNB over the evaluation period were within the institution’s AAs.
- The distribution of borrowers reflects, given the product lines offered by the SNB, adequate penetration among retail customers of different income levels and business customers of different size in the AA over the evaluation period.
- SNB made a relatively high level of community development lending during the evaluation period involving loans that have an affordable housing or other community development purpose.
- The bank’s performance under the lending test in New York State is rated satisfactory. Based on full-scope review, the bank’s performance in the NYS Non-MSA is adequate.

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 usually have between 2,500 and 8,000 persons, and 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on 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 % 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 % of the area median income, or a median family income that is less than 50 %, 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 ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

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

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

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) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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 % of the area median income, or a median family income that is at least 120 %, in the case of a geography.

Description of Institution

On October 31, 2013, (subsequent to the evaluation period) the merger of the savings and loan holding company Provident New York Bancorp (PBNY) with Sterling Bancorp was completed. On that date, Sterling Bancorp merged with and into PBNY, with PBNY surviving the merger. At closing on October 31, 2013, PBNY changed its name to Sterling Bancorp, and Provident Bank, the subsidiary of PBNY, changed its name to Sterling National Bank (SNB or bank) and became a nationally chartered bank. Effective October 31, 2013, SNB was a subsidiary of the financial services holding company Sterling Bancorp. Sterling Bancorp is headquartered at 400 Rella Boulevard, Montebello, NY 10901.

SNB's primary business is in commercial real estate loans, C&I loans, and 1-4 family residential real estate loans (home purchase/refinance/home improvement loans). At September 30, 2013 (prior to the merger date) the bank had total assets of \$4 billion. Total net loans were \$2.4 billion, and total deposits were \$3.0 billion. Net loans and leases represented 58.97% of total assets. This loan portfolio was comprised of residential mortgages (24.8%), commercial, commercial real estate and commercial and industrial (C&I) loans (74.0%), and consumer loans (1.2%). Net Tier 1 Capital was \$363 million. PBNY had assets of approximately \$585 million, of which approximately \$515 million represented an investment in legacy Provident Bank, and about \$4 million represented investment in other subsidiaries, with Provident Risk Management (insurance captive) being the largest. The holding company had limited activities, principally stock-based compensation and operating expenses associated with being a public company.

As of December 31, 2013, the merged bank had total assets of \$6.6 billion. Sterling Bancorp has assets of \$1.1 billion, of which approximately \$980 million represents an investment in SNB, and approximately \$6.0 million represents an investment in other subsidiaries. The increase in assets at December 31, 2013 represents the issuance of \$39.1 million shares of the holding company that has a value of \$458 million and was used to purchase legacy Sterling Bancorp. Sterling Bancorp has limited activities and as of December 31, 2013, it has debt of \$100 million from its senior notes issuance of July 2, 2013. \$60 million of that was contributed to the bank as a capital injection and the remainder will be used for corporate purposes and to redeem the subordinated debentures.

SNB is a financial services firm that specializes in the delivery of service and solutions to business owners, their families, and consumers in communities within the greater New York City (NYC) area through teams of relationship managers. The bank offers a complete line of commercial, business, and consumer banking products and services. SNB is an interstate bank with 33 branches located in the states of New York and New Jersey. The branch network includes 12 branches in Rockland County, two in New York County and two in Westchester County, one in Putman and one in Bergen County. There are 11 branches in Orange County, and one branch in Ulster County. There is one branch in Suffolk County and there are two branches in the Forestburgh and South Fallsburg towns of Sullivan County.

SNB's strategic focus throughout the evaluation period was to expand its CRA Assessment Area (AA) into the NYC markets and capture the owner-led lower middle market business customers and small businesses. Through 2011, the bank's AA consisted of Rockland and Orange counties in New York State and portions of surrounding counties. On August 10, 2012, the bank completed an acquisition of Gotham Bank of New York (GBNY) which expanded the bank's presence in the NYC market place. The bank's strategic focus in NYC is serving targeted customer segments through a team-based, relationship management strategy. Particular areas of lending focus include owner-led lower middle

market and small businesses, and certain consumer segments, including the residential and consumer lending needs of business owners. With respect to lower middle market customers, the bank's focus is on businesses with annual revenues of \$5 million to \$100 million while the primary focus on small businesses is on entities with annual revenues of \$500 thousand to \$5 million. Beginning in 2013, the bank's AA was further expanded to include Nassau County and the western portion of Suffolk County, Long Island, consistent with the bank's expansion into this area. Similar to NYC, the bank's strategic focus on the western portion of Long Island was serving targeted customer segments through a team-based, relationship management strategy, including owner-led lower middle market and small businesses, and certain consumer segments.

SNB's last Public Evaluation (PE) dated November 1, 2010 was conducted by the Office of Thrift Supervision (OTS) and the overall rating was *Satisfactory*. There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test for home mortgages reported under the Home Mortgage Disclosure Act (HMDA) and loans to small businesses is from January 1, 2011 through September 30, 2013. For community development (CD) loans, services, and investments, the evaluation period is from November 1, 2010 through January 20, 2014. The CD investments also include outstanding CD investments made by legacy Sterling National Bank after January 1, 2012.

In our evaluation of lending, we evaluated two periods separately, 2011, and 2012 to 2013. The separation is due to the difference in census information used for each period. The 2000 Census information was used for the 2011 period, and the 2010 Census information was used for the 2012 to 2013 period. Although we evaluated lending data for both periods, we are conducting a full analysis of 2012-2013 data with limited presentation of 2011. We included the lending tables for 2012 to 2013 within this PE as they included the most recent market share data available. The tables for the 2011 period were excluded in order to keep the report to a reasonable size. CD loan and investment data presented in the tables cover 2011 to 2013. The branch distribution contained in Table 15 represents branch locations by income classification per the 2010 Census.

Data Integrity

A data integrity examination of the loan information discussed in the Evaluation Period/Product Evaluated section above was completed in September 2013. Publicly filed information and registers were examined by the OCC to verify the accuracy of the data. The 2011, 2012 and 2013 reportable HMDA data and small business loans were not accurate and required corrections, which the bank completed prior to this CRA examination. This evaluation period is based on corrected/accurate data.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the bank's AA, which consisted of one non-Metropolitan Statistical Area (MSA), two Metropolitan Divisions (MD) and two MSAs. The NY-NJ MD and Nassau-Suffolk MD are part of the NEW YORK-NEWARK-JERSEY CITY, NY-NJ-PA Multistate MSA (NY-NJ-PA MMSA) #35620. With the exception of the Non-MSA Sullivan County portion of the combined AA, the remaining MD and MSAs are part of the larger New York-Newark-Bridgeport, NY-NJ-CT-PA Combined Statistical Area (NY CSA) #408. There are 3,209 combined tracts in the banks assessment area.

Competition in the MSA is very strong and includes local community banks, regional banks, national non-bank financial institutions and mortgage companies. Banking competition is very strong for both loans and deposits.

Major banking competitors in the MSA include:

- JP Morgan Chase Bank, N.A., ranked 1st in deposit share (34.68%) with 5,674 offices;
- The Bank of New York Mellon, ranked 2nd in market share of deposits (8.09%) with 6 offices;
- Bank of America, N.A., ranked 3rd in deposit share (7.54%) with 5,398 offices.

Local competition in the MSA includes:

- Columbia Bank, \$3.1 billion in total deposits , (0.22% market share) with 44 offices;

- Hudson Valley Bank, NA \$2.6 billion in total deposits, (0.21% market share) with 33 offices;
- Kearney Federal Savings Bank, \$2.4 billion in total deposits (0.19%) with 41 offices;
- New York Commerical Bank \$2.4 billion in total deposits (0.19%) with 35 officers.

Wells Fargo Bank, JP Morgan Chase Bank, and Bank of America remain amongst the largest mortgage lenders in the New York City area. Wells Fargo Bank, JP Morgan Chase Bank, and TD Bank are amongst the largest small business lenders in the New York City area. SNB competes with these banks and many other lenders that have significantly larger footprints and available funding for residential mortgage and small business lending. SNB offers a traditional line of banking products for loans and deposits. The economy in the area is stable. Major employers in the AA include numerous local governments, hospitals, and school districts, and Wall Street companies represent the largest private employers.

Refer to the market profile in Appendix C for the demographics and other performance context information.

New York-Wayne-White Plains, NY-NJ MD #35644

Lending levels in the New York-Wayne-White Plains, NY-NJ MD reflect adequate responsiveness to the AA's credit needs. During the evaluation period, 63% of all loans originated were made in this MD. Small business loans represent a majority of the bank's lending to individuals with 70.3% of all small business lending conducted in the MD and will be equally weighted against home mortgage loans that comprised 59.2% of lending in the MD. Home purchase, home improvement, home refinance and multi-family loans represented 15%, 15%, 60% and 10%, respectively, of all mortgages originated in this MD. Small business loans are a major credit need of the MD and are reflected in the volume of lending, 70.3% for the MD. SNB has a total of 18 branches through the NY-NJ MD MD, with one located in Bergen County, NJ.

New York-Wayne, White Plains NY-NJ MD (NY-NJ MD) #35644

Rockland County, New York
 Putnam County, New York
 Westchester County, New York
 Bergen County, New Jersey
 Bronx County, New York
 Kings County, New York
 New York, County
 Queens County, New York

Nassau-Suffolk, MD #35004

Lending levels in the Nassau-Suffolk MD reflect adequate responsiveness to the AA's credit needs. For 2013, 1.7% of all loans originated were made in this MD. Home mortgage product loans represent a majority of the bank's lending to individuals with 71.0% of home mortgage lending conducted in the MD compared to 24% of small business lending. The bank did not originate home improvement loans in this MD. Home purchase, home refinance and multi-family loans represented 24%, 43%, and 4.8%, respectively, of all mortgages originated in this MD. Small loans to businesses were 1.2% of all total small business loans originated by the bank. Nassau-Suffolk has one branch.

Nassau-Suffolk MD (Nassau-Suffolk MD) #35004

Nassau County, New York

Towns of Huntington, Babylon, Smithtown, Islip, and Brookhaven in Suffolk County, New York

Poughkeepsie-Newburgh-Middletown MSA (Orange County)

Lending levels in the PNM MSA reflect weak responsiveness to the AA's credit needs. During the evaluation period, 36% of all loans originated by SNB were made in this MSA. Small business loans represent a majority of the bank's lending to individuals with 37.4% of all small business lending conducted in the MSA, which will be weighed more than home mortgage loans that comprised 33.7 % of lending in the MSA. PNM MSA has 11 branches.

Poughkeepsie-Newburgh-Middletown, NY MSA (PNM MSA) #39100

Orange County, New York

Kingston MSA (Ulster County)

Lending levels in the Kingston, NY MSA reflect adequate responsiveness to the AA's credit needs. During the evaluation period, 4% of all loans originated by SNB were made in this MSA. Small business loans represent 4.2% of lending to individuals and will be equally weighted against home mortgage loans that comprised 3.8% of lending in the MSA. Kingston MSA has one branch.

Kingston, NY MSA (Kingston MSA) #28740

Towns of Shawangunk, Gardiner, Wawarsing, and Rochester in Ulster County, New York

New York State Non-MSA (Sullivan County)

Lending levels in Sullivan County reflect adequate responsiveness to the AA's credit needs. For 2013, 2.1% of all loans originated were made in this Non-MSA. Home mortgage product loans represent a majority of the bank's lending to individuals with 1.3% of home mortgage lending conducted in the Non-MSA compared to 0.7% small business lending. Home purchase, home improvement, home refinance and multi-family loans represents 0.2%, 0.5%, 1.08 and 0.2%, respectively, of all mortgages originated in this Non-MSA. Small loans to businesses were 2.0% of all total small business loans originated by the bank. Non-MSA has two branches.

Non-MSA (NYS Non-MSA)

Towns of Mamakating, Forestburgh, Thompson and Fallsburg, in Sullivan County, New York

Ratings

The bank's overall rating is a blend of the NY CSA that consists of PNM MSA, Kingston, MSA and the NY-NJ-PA MMSA and the New York State ratings. The rating of the NY-NJ-PA MMSA #35620, which included the assessment of NY-NJ MD and Nassau-Suffolk MD, were weighted most heavily in arriving at the overall conclusion because this MMSA consisted of the most counties and largest number of office locations by SNB over the evaluation period.

Small loans to businesses and home mortgage products received equal weight in evaluating the Lending Test. Approximately 51.8% of the loans originated during the evaluation period were small business loans in the AA, with home mortgage products accounting for 44.3%. The remaining % of loans was 2.6% in multi-family loans and 1.3% in small farm loans. The bank's highest loan originations were 63% in NY-NJ MD and 30.3% PNM MSA. In addition, home refinance mortgages were given more weight in our analysis than home purchase and home improvement loans as refinance loans represent the largest lending volume. Home refinance loans represent 27.9% of the home mortgages in the AA. In

NJ-NY MD and PNM MSA, they accounted for 57.1% and 35.5% of all home mortgages, respectively. Further, home refinances loans and small loans to businesses were identified as the primary credit need of the AA.

In our evaluation of lending, we evaluated two periods separately, 2011, and 2012 to 2013. The separation is due to the difference in census information used for each period. The 2000 Census information was used for the 2011 period, and the 2010 Census information was used for the 2012 to 2013 period. We included the lending tables for 2011 and 2012 to 2013 within this PE. The lending tables for 2012 to 2013 included the most recent market share data available. CD loan and investment data presented in the tables cover 2011 to 2013. The branch distribution contained in Table 15 represents branch locations by income classification per the 2010 Census.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Multistate Metropolitan Area Rating

New York-Newark-New Jersey City NY-NJ-PA

CRA rating for the (New York-Newark-New Jersey City NY-NJ-PA MMSA)¹: Low Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: High Satisfactory

The major factors that support this rating include:

- The lending levels reflect adequate responsiveness to assessment area credit needs.
- The distribution of borrowers reflects, given the product lines offered by the SNB, adequate penetration among retail customers of different income levels and business customers of different size in the AA over the evaluation period.
- A substantial majority (93%) of the home mortgage loans, small loans to businesses and farms originated by SNB over the evaluation period were within its AAs.
- SNB has made a relatively high level of community development lending during the evaluation period involving loans that have an affordable housing or other community development purpose.

Description of Institution's Operations in (New York-Newark-Jersey City, NY-NJ-PA MMSA)

NY-NJ-PA MMSA consists of the two metropolitan divisions, NY-NJ MD and Nassau-Suffolk MD. In June 2013, Bronx County, NY, reported the highest unemployment rate in the NY-NJ-PA MMSA at 11.8%, with 12 of the 23 counties that make up the metropolitan area having rates that exceeded the U.S. rate of 7.8%. The area's lowest rates were reflected in Nassau (6.0%), Rockland (5.9%), and Putnam (5.8%) Counties, NY. All 23 counties in the New York area had lower unemployment rates in June 2013 than one year earlier. The largest declines occurred in the Nassau-Suffolk MD, with a fall of 1.4% in Suffolk County and a drop of 1.3% in Nassau County. In total, seven area counties registered declines greater than 1.0%. By comparison, the national unemployment rate declined 0.6 percentage point over the year.

While lending in the bank's legacy market areas (Rockland and Orange counties and surrounding communities) continues to include broad-based residential and consumer lending, within NYC the bank's strategic focus during the evaluation period did not include broad-based residential and consumer lending. Within NYC, the bank maintained a single full-service retail branch office in Manhattan, along with a second designated branch involving a lending team that originated business-purpose loans and provided other bank-related services to businesses.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in NY-NJ-PA MMSA

The scope under the evaluation of NY-NJ-PA MMSA includes the analysis of PNM MSA and Kingston MSA. PNM MSA and Kingston MSA along with NY-NJ MD and Nassau-Suffolk MD are part of the larger NY CSA #408. A full-scope review was conducted for NY-NJ MD, Nassau-Suffolk MD, PNM MSA and Kingston MSA and the ratings are based on the performance results of each. The NY-NJ MD and PNM MSA were most heavily weighted in arriving at the overall conclusions. More weight was placed on the results of NY-NJ MD due to the significant number of lending and community development activities conducted in the MD during the evaluation period, and a significant majority of census tracts in the AA are within this MD. The performance results during the evaluation period show the bank as the market leader in the PNM MSA. Similar to NY-NJ MD the bank has conducted a significant amount of lending in the PNM MSA. Less weight is placed on the results of Kingston MSA and Nassau-Suffolk MD. SNB has a limited presence in the Kingston MSA with only 10 census tracts based on the 2010 Census Data. In 2013, the bank expanded the AA into the Nassau-Suffolk MD therefore analysis of this MD only includes the first nine months of 2013.

In our evaluation of lending, we evaluated two periods separately, 2011, and 2012 to 2013. The separation is due to the difference in census information used for each period. The 2000 Census information was used for the 2011 period, and the 2010 Census information was used for the 2012 to 2013 period. We included the lending tables for 2011 and 2012 to 2013 within this PE. The lending tables for 2012 to 2013 included the most recent market share data available. CD loan and investment data presented in the tables cover 2011 to 2013. The branch distribution contained in Table 15 represents branch locations by income classification per the 2010 Census.

Refer to the table in Appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in NY-NJ MMSA is rated Satisfactory. Based on full-scope reviews, the bank's performance in the NY-NJ MD and Nassau-Suffolk MD are adequate. The performance in PNM MSA needs to improve. The bank's performance in the Kingston MSA is adequate.

Lending Activity

Refer to Tables 1 *Lending Volume* and 1 *Other Products* in Appendix D for the facts and data used to evaluate the bank's lending activity.

The lending levels reflect adequate responsiveness to assessment area credit needs.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflects adequate penetration throughout the AA, particularly to low- or moderate- income geographies in the AA. The geographic distribution of home mortgage loans is adequate considering the limited amount of low- or moderate- income tracts within the AA. The geographic distribution of loans reflects adequate penetration of small business loans in the AA.

Small loans to farms were not analyzed due to a significantly low amount of small farm loans available for origination or purchase over the evaluation period. Small loans to farms were not factored into the overall analysis of the geographic distribution of lending by income level.

Refer to Table 7 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

All information for the year 2011 is derived from 2000 Census Data. All information for the years 2012-2013 is derived from 2010 Census Data.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the full review section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

New York-Wayne-White Plains, NY-NJ MD #35644

Home Purchase Loans

The geographic distribution of home purchase loans reflects adequate distribution when taking into account the challenges that low- and moderate- income individuals have in purchasing a home in this MD.

In 2011, the bank made 29 home purchase loans but did not lend in low- and moderate- income geographies, which reflects poor penetration in this MD. In 2012 and 2013, the bank's percentage of home purchase loans in low and moderate- income geographies totaled 13.97%, which is near to the 14.85% of owner-occupied units located in moderate- income geographies. 2012-2013 overall home purchase loan volume in this MD was 64 loans.

Home Improvement Loans

The geographic distribution of home improvement loans reflects poor distribution throughout this MD particularly to low- or moderate-income geographies.

In 2011, the bank made 30 home improvement loans but did not lend to borrowers in low- and moderate- income geographies, which reflects very poor penetration in this MD. In 2012 through 2013, the bank made 67 home improvement loans but did not lend in low- income geographies, reflecting very poor penetration. The percentage of home improvement loans made in moderate- income geographies at 1.49% is significantly lower than the 12.31% of owner-occupied units in the moderate-income tracts.

Home Refinance Loans

The geographic distribution of home refinance loans reflects poor distribution when taking into account the difficulty that low- and moderate- income individuals have in refinancing a home in this MD.

In 2011, the bank made 1.27% or 79 home refinance loans in low-income geographies. This exceeds the 0.25% of owner-occupied housing units in the low-income tracts in this MD. However, no loans were made to borrowers in moderate-income geographies, compared to 1.10% of owner-occupied units in moderate-income geographies. In 2012 and 2013, of 262 total home refinance loans, the bank's percentage of home refinance loans at 1.15% in low-income geographies is lower than the 2.54% of owner-occupied units located in low-income geographies. The bank's percentage of home refinance

loans in moderate-income geographies at 2.29% is significantly lower than the 12.31% of owner-occupied units located in moderate-income geographies.

Multifamily Loans

The geographic distribution of multi-family loans reflects good distribution.

In 2011, the bank originated three multi-family loans, of which none were made to borrowers in low- or moderate-income geographies. This reflects very poor penetration within the MD. However, in entirety, the bank originated four multifamily loans and the AA consisted of the legacy lending, which were rural counties in upstate NY. In 2012 and 2013, the bank had expanded its AA and lending into New York City, and the bank collectively originated 56.53% of loans in low- and moderate-income tracts, exceeding the percentage of owner-occupied multi-family units in the low- and moderate-income tracts at 45.05%. The bank maintains a combined 3.49% market share of multi-family lending to low- and moderate-income tracts in this MD.

Nassau-Suffolk MD #35004

Lending in Nassau-Suffolk County for the evaluation period only consisted of the first nine months in the year 2013. The bank had 568 census tracts that consisted of 284 census tracts from the entire Nassau County and 284 out of 323 census tracts for Suffolk County. There were 13 low-income and 84 moderate-income tracts within this AA. The bank did not originate or purchase home improvement loans in this MD, and minimal weight is attributed to that loan category.

The geographic distribution of home mortgage loans in Nassau-Suffolk is good. SNB made one home purchase loan in a moderate-income geographic area out of five total purchase loans for 20.00% which exceeds the 12.86% of owner-occupied units available in that MD. The bank made one home refinance loan in a moderate-income geographic area that at 11.11% is near to the 12.86% of owner-occupied units. The bank made only one multi-family loan in 2013, which was made in a moderate-income geographic area.

PNM MSA #39100

After considering the limited number of low- and moderate-income tracts available and the challenges that low- and moderate-income individuals have in purchasing a home in this MSA, the bank's performance of geographic distribution of home mortgage loans reflects weak penetration; however, lending to low- or moderate-income geographic areas is a challenge in this MSA as there are only a few low-income (5 in 2011 and 7 in 2012 and 2013) and moderate-income (14 during the evaluation period) tracts available to lend.

Home Purchase Loans

The geographic distribution of home purchase loans is very poor.

For 2011 and 2012-2013, the bank purchased 37 home purchase loans during the evaluation but did not originate any home purchase loans in low-income geographic areas. In 2012 and 2013, the bank did not originate any multi-family loans to borrowers in moderate-income geographic areas. The only home purchase lending provided in this MSA was in 2011, and the bank made 6.67% of home purchase loans in moderate-income tracts, however this was significantly lower than the 10.51% of owner-occupied units available.

Home Improvement Loans

The bank purchased 24 and 54 home improvement loans in 2011 and 2012-2013, respectively. However, the geographic distribution of home improvement loans reflects very poor distribution throughout this MSA, as there were no home improvement loans provided in low- or moderate-income geographies.

Home Refinance loans

The geographic distribution of home refinance loans reflects very poor distribution.

In 2011, the bank did not originate home refinance loans to borrowers in low-income geographic areas and the percentage of home refinance loans to moderate-income geographies at 4.17% is significantly lower than the 10.51% of owner-occupied units. This is somewhat mitigated by the fact that there are very few low- or moderate-income tracts in the bank's AA for this MSA.

In 2012 and 2013, the bank's percent of home refinance loans in low- and moderate-income geographic areas were 0.61% and 1.83% respectively, significantly lower than the 2.77% and 11.65% of available low- and moderate-income owner-occupied units.

Multifamily Loans

The bank only originated 4 multi-family loans in total during 2011, and 54 in total during 2012-2013. None of the 2011 loans were in the PNM MSA. Five of the 2012-2013 loans were in the PNM MSA, of which one was in a low-income geography, while just under 40% of all multi-family units in this MSA are located in low- and moderate-income geographies. The geographic distribution of multi-family loans reflects poor penetration, but is modestly weighted given this is not a significant loan product for SNB.

Kingston MSA #28740

The geographic distribution of home mortgage loans in Kingston MSA reflects adequate penetration considering the nine tracts that make up this portion of the bank's AA for this MSA. During the evaluation period, there were no low-income geographic areas (owner-occupied units, multi-family units or small business) to analyze. For the review of geographic distribution, we focused on the bank's ability to penetrate the moderate-income geographic areas.

Home Purchase Loans

The bank made one home purchase loan in the year of 2011 and one home purchase loan in the combined years of 2012 and 2013; however, neither loan were made in moderate-income geographic areas and reflects very poor penetration in this MSA, when compared to the 14.29% of all owner-occupied units are in moderate-income geographies.

Home Improvement Loans

In 2012 and 2013, the bank's percentage of home improvement loans to borrowers in moderate-income tracts at 12.50% is somewhat near to the percent of owner-occupied units at 14.29%. In comparison to the year 2011, the bank was able to generate more home improvement lending in the Kingston MSA. The percentage of home improvement loans to borrowers in moderate-income tracts at 50.00% exceeds the percent of owner-occupied units at 8.46%.

Home Refinance Loans

In 2011, the bank's did not originate any home refinance loans in moderate-income tracts and therefore the percentage of home refinance loans is significantly lower than the 8.46% of owner-occupied units. The bank made eight home refinance loans in the Kingston MSA.

In 2012 and 2013, the bank originated 18 home refinance loans, of which five or 27.78% were made in moderate-income geographic areas, which exceeds the 14.29% of owner-occupied units available.

Multi-family Loans

The bank did not originate or purchase multi-family loans in moderate-income geographies in this MSA over the evaluation period. There were 53.89% and 59.24% of multi-family units in moderate-income geographies in 2011 and 2012-2013, respectively. This reflects very poor penetration for multi-family lending as the bank did not originate any loans in this area, but is modestly weighted given this is not a significant loan product for SNB.

Small Loans to Businesses

Refer to Table 6 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

New York-Wayne-White Plains, NY-NJ MD #35644

Geographic distribution of small loans to businesses reflects less than adequate penetration throughout the MD. Economic conditions and competition are the largest concern in these territories; however, opportunities in the region are still available for the bank. In total the bank made 660 small business loans for the three year period in this MD, of which 296 were in 2011.

In 2011, small loans to businesses (businesses with revenues of \$1 million or less) in this MD represented 45% of all small loans to businesses originated by the bank. There were no small business loans made to low- income tracts in 2011. The percentage of small loans to businesses in moderate-income tracts is 1.69% and is significantly lower than the 4.24% of business in moderate- income geographies.

Origination volume increased in 2012 and 2013, as the bank expanded into the New York City market; small loans to business in this MD grew to 69% of all small loans to businesses made by the bank. The percentage of small loans to businesses in low-income geographies is 4.49% and is lower than the 7.32% of businesses in low-income geographies. Small loans to businesses in moderate- income geographies was 5.09% and is significantly lower than the 16.90% of businesses in the moderate-income geographies.

Nassau-Suffolk MD #35004

The geographic distribution of small loans to businesses is adequate. The bank originated six small business loans; there were 1.62% of small businesses in low-income geographies and 13.53% of small businesses in moderate-income geographies. However, the bank had no small business lending in this MD in low- and moderate- income geographies due to the short amount of time the bank has been in this MD. The bank's performance in lending small business loans in the MD did not weigh materially into the overall analysis of the geographic distribution of lending by income level of geography.

PNM MSA #39100

The geographic distribution to small loans to business reflects adequate penetration throughout the MSA.

In 2011, small loans to business (businesses with revenues of \$1 million or less) in this MSA represented 47% of all small loans to businesses originated. The percentage of small loans to businesses in low- income tracts is 8.39% and is equal to 8.33% of businesses in low- income geographies. The percentage of small loans to businesses in moderate- income tracts at 7.10% is lower than the 13.21% of business in moderate- income geographies.

In 2012 and 2013, the amount of small loans to businesses originated by SNB in this MSA declined to 25%, which was mainly due to the increased shift in small business lending in the NY-NJ MD. The increase in business lending in NY-NJ MD was due to the bank expanding the AA into the counties located in New York City. The percentage of small loans to businesses in low-income tracts at 4.10% is somewhat lower than the 7.73% of business in low-income geographies. The percentages of small loans to businesses in moderate-income tracts is 4.92% and significantly lower than the 13.32% of business in moderate- income geographies.

Kingston, MSA #28740

The geographic distribution of small loans to businesses reflects excellent penetration throughout the MSA. SNB originated 39 small loans to businesses in 2011 and 10 small loans to business in 2012 and 2013. There were no businesses in low-income geographies. The bank did however provide loans to small business owners at 25.64% in 2011 and at 40.00% in 2012 and 2013, which exceeds the 13.33% and 17.77% of small business in the moderate- income geographic areas.

Lending Gap Analysis

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in SNB's lending patterns.

Inside/Outside Ratio

An analysis of the bank's lending within its assessment areas was performed at the bank level as opposed to the individual AA levels. This information includes bank originations and purchases only. A substantial majority (93%) of the home mortgage loans, small loans to businesses and farms originated by SNB over the evaluation period were within its AAs. 94% of the small loans to businesses and 100% of the farm loans were within its AAs. For HMDA products, 91% of all originations and purchases were within the AAs. 87% of all purchase money mortgages originated were in the AAs, 95% of all home improvement loans were in the AAs, and 91% of all refinance mortgages were in the AAs.

This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

Distribution of Loans by Income Level of the Borrower

Given the product lines offered by the SNB, the distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different size in the AA over the evaluation period.

We considered demographic factors including the high cost of housing compared to the median family income of a low-income borrower, and the high percentage of individuals below the poverty level, in our home mortgage analysis. The property types of the home mortgage loans consist of one to four family and manufactured homes.

The borrower distribution of the bank's home mortgage loans reflects adequate distribution among borrowers of different income levels. The borrower distribution of small loans to businesses is adequate, especially when considering the strong competition for these loans from very large regional banks and non-bank financial institutions. Small business origination volume shows a decline in the years of 2012 and 2013; however, the bank's lending to small businesses increased when considering the relatively high amount of Community Development lending provided to low- and moderate- income borrowers. The bank's performance indicates that business lending is primarily to small businesses.

SNB lending in the Nassau-Suffolk MD consists of only the last three quarters of the evaluation period. There was no home mortgage lending provided to low- or moderate-income borrowers and analysis of the distribution of loans by income of the borrower is not meaningful. The bank's percentage of small business loans with revenues of \$1 million or less is somewhat lower than the percentage of business in the MD; however, this is mitigated by the limited time the bank had to penetrate this MD.

Small loans to farms were not analyzed due a significantly low amount of small farm loans available for origination or purchase over the evaluation period. Small loans to farms were not factored into the overall analysis of the borrower distribution of lending by income level.

Refer to Table 12 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms. The bank made virtually no other loans to farms except in the PNM MSA.

All information for the year 2011 is derived from 2000 Census Data. All information for the years 2012-2013 is derived from 2010 Census Data.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

New York-Wayne-White Plains, NY-NJ MD #35644

Home Purchase Loans

The distribution of the bank's home purchase loans by income level of borrowers in the NY-NJ MD reflects poor penetration among retail customers of different income levels and business customers of different size. In 2011, the percentage of home purchase loans made to low- and moderate- income borrowers were both lower than the percentage of low- and moderate- income borrowers at 3.70% each. The overall percentage of low and moderate-income borrowers in this AA was 11.19% and 10.70%, respectively.

In 2012 and 2013, the amount of home purchase lending in the NY-NJ MD was the highest at 68.09% of home purchases made in the AA. However, there were no home purchase loans made to low- income

borrowers and the percentage of home purchase loans made to moderate-income borrowers was very poor at 7.27% compared to the percentage of moderate-income borrower at 15.57%.

Home Improvement Loans

The distribution of the bank's home improvement loans by income level of borrowers in the NY-NJ MD reflects poor penetration among retail customers of different income levels and business customers of different sizes, as the bank originated few loans during the three years. Given that this is not a major loan product for the bank, the performance is not given significant weight. During the evaluation period, SNB made a majority (51.72%) of its home improvement loans in the NY-NJ MD. In 2011, while there were 11.19% of low-income families in the AA, the bank did not make home improvement loans to low-income borrowers. The percentage of home improvement loans made to moderate-income borrowers at 6.67% was lower than the 10.70% of moderate-income families.

In 2012 and 2013, the percentage of home improvement loans made to low-income borrowers was 1.52% and significantly lower than the 26.16% of low-income families in available for home improvement loans in this MD. The percentage of home improvement loans made to moderate-income borrowers at 7.58% is lower than the percentage of moderate-income families at 15.57%.

Home Refinance Loans

Borrower distribution of home refinance loans reflects poor distribution among customers of different income levels, despite overall home improvement loans totaling 342 for the three years. In 2011, no loans were made to low-income borrowers and the 2.56% of loans made to moderate-income borrowers is lower than the 10.7% of moderate-income families. In 2012 and 2013, the percentage of loans in low-income tracts at 1.20% was significantly lower than the 26.16% of low-income families, while, the percentage of loans in moderate-income tracts at 7.17% is lower than the 15.57% of moderate-income families in the MD.

PNM MSA #39100

Home Purchase Loans

Borrower distribution for home purchase loans reflects good distribution among customers of different levels. In 2011, the percentage of loans made to low-income borrowers at 20% was equal to the percent of low-income families in the MSA. The percentage of loans made to moderate-income borrowers at 13.33% was somewhat lower than 18.19% of moderate-income families in the MSA.

In 2012 and 2013, 9.52% of home purchase loans made to low-income borrowers were lower than 21.17% of low-income families in PNM MSA. The percentage of loans made to moderate-income borrowers exceeds the percentage of moderate-income families by 34%.

Home Improvement Loans

Borrower distribution for home improvement loans reflects good distribution among customers of different levels. In 2011, only twenty-four loans were made in this MSA. No loans were made to low-income borrowers; this was significantly lower than 20.71% of low-income families. The percentage of loans to moderate-income borrowers at 41.67% exceeds the percentage of moderate-income families at 18.19% and exceeds the market share lending data at 5.45%.

Improvement in the level of home improvement lending to low-income borrowers was noted in 2012-2013. The percentage of loans made to low-income borrowers at 5.77% was lower than 21.17% of low-

income families; and 17.31% of loans made to moderate- income borrowers was near to 17.78% of moderate- income families and near to the market share lending data.

Home Refinance Loans

Borrower distribution for home refinance loans reflects poor distribution among customers of different income levels. In 2011, the percentage of loans made to low- and moderate- income borrowers at 6.52% and 10.87% were both lower than the percent of low-and moderate- income families. The analysis shows that the percent of low- and moderate-income refinance loans stated above also exceeds the market share data at 3.20% for low-income and 2.92% moderate- income.

In 2012-2013, the percentage of loans made to low-income borrowers at 5.10% was significantly lower than the percentage of low-income families at 21.17%. The percentage of loans made to moderate-income borrowers at 15.29% is near to the percentage of moderate- income families at 17.78%.

Kingston MSA #28740

Borrower distribution for home mortgage loans in this MSA reflects adequate penetration. SNB did not generate a sufficient amount of home mortgage loans due to the limited number of tracts; the bank's percentage of lending in this MSA is the lowest within the assessment area. However, there were a significantly large percent of low- and moderate-income families within each home mortgage type for the bank to generate lending.

Home Purchase Loans

Borrower distribution for home purchase loans reflects very poor distribution among customers of different levels. The bank only made two home purchase loans during the evaluation period. In 2011, the bank did not provide low- or moderate-income borrowers with home purchase loans, while, there were 20.06% of low-income families and 16.46% of moderate-income families within the MSA. In 2012 and 2013, there was one home purchase loan made to a moderate- income borrower.

Home Improvement Loans

Borrower distribution for home improvement loans reflects adequate distribution among customers of different levels. In 2011, no loans were made to low- income borrowers; this was significantly lower than the 20.06% of low-income families. There were only two home improvement loans made in 2011 and one was made to a moderate-income borrower. The percent of families in moderate-income families was 16.67%. Despite the low volume of loans overall, the distribution is adequate.

In 2012 and 2013, the bank increased its lending of home improvement loans in the Kingston MSA from two loans to eight loans. The percent of loans made to low-income borrowers at 12.50% was lower than the 21.82% of low- income families in the MSA. The percentage of loans made to moderate- income borrowers at 12.50% was somewhat near to the percentage of moderate- income families in the MSA at 16.74%.

Home Refinance Loans

Borrower distribution for home refinance loans reflects adequate distribution among customers of different levels. In 2011, the percentage of home refinance loans is somewhat lower than the percent of percentage of low- income families in the MSA. The percentage of moderate- income loans at 71.43% exceeds the 16.46% of moderate- income families in MSA and significantly higher than the percent of moderate- income borrowers in the market.

In 2012 and 2013, the 5.88% of loans made to low-income borrowers was significantly lower than the 21.82% of low-income families in the MSA. The percentage of loans made to moderate-income borrowers exceeds the percentage of moderate-income families. Market share data shows both low- and moderate-income home refinance lending in this MSA exceeds the market.

Small Loans to Businesses

Refer to Table 11 in Appendix D-18 for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

New York-Wayne-White Plains, NY-NJ MD #35644

The borrower distribution of the bank's small loans to small businesses reflects adequate distribution among business customers of different income levels. In 2011, small loans to small businesses (businesses with revenues of \$1 million or less) represents 60.81% of all small loans to businesses originated by SNB in the MD compared to 68.81% of the businesses within the MSA defined as such. The bank's lending to small businesses is somewhat lower than the percentage of small businesses in the MD, which is reasonable given the size of the bank compared to many much larger lenders in the area. The distribution by size of loan in the MD also shows that a substantial majority (73%) of the loan originations are for \$100,000 or less.

In 2012 and 2013, small loans to small businesses represents 36.47% of all small loans to businesses originated by SNB in the MD compared to 72.34% of the businesses within the MSA; nonetheless, the bank's percentage of small loans in this MD reflects meaningful performance. The bank's lending to small businesses was lower than the percentage of small businesses in the MD. The distribution by size of loan in the MD decreased to less than a majority (31%) of business loan originations for \$100,000 or less as the lending shifted to small business loan originating with amounts over \$100,000 and over \$250,000.

PNM MSA #39100

The borrower distribution of the bank's small loans to small businesses reflects adequate distribution among business customers of different income levels. The bank's percentage of small loans at 70.32% exceeds the 68.84% of businesses with revenues of \$1 million or less in 2011. In 2012 and 2013, 45.08% of the bank's small loans to small businesses are lower than the 72.34% of small businesses in this MSA. The distribution by size of loan shows that a substantial majority (82%) of loan originations is for \$100,000 or less in 2011, and a less than majority (43%) in 2012 and 2013.

Kingston MSA #28740

The borrower distribution of the bank's small loans to small businesses reflects adequate distribution among business customers of different income levels. The volume of loans is one of the smallest in this geography with 5.94%, in 2011 and 2.00%, in 2012 and 2013. The bank's percentage of small loans at 79.49% exceeds the 71.91% of businesses with revenues of \$1 million or less in 2011. In 2012-2013, 20% of small loans originated by the bank were lower than the 75.82% of businesses in the MSA. The distribution by size of loan shows that a substantial majority (85%) of loan originations is for \$100,000 or less in 2011 and less than the majority at 40% in 2012 and 2013.

Community Development Lending

SNB has made a relatively high level of community development loans during the evaluation period involving loans that have an affordable housing or other community development purpose. We determined through our community contact and our internal research that the competition for these loans is very strong from both community banks and other large regional financial institutions operating in the area. Community development lending has a positive impact on the Lending Test and the originated loans are responsive to the needs of the AA.

Refer to Table 1 Lending Volume in the full scope section for NY-NJ MD, Nassau-Suffolk MD, PNM MSA and Kingston MSA of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

SNB originated 22 CD loans for \$52.6 million, or 14.48% of Tier 1 capital, in the AA during the evaluation period. The bank funded:

- Eight loans, totaling \$24 million, for thirteen multifamily apartment buildings providing 354 affordable housing units for LMI individuals
- Two loans, totaling \$6.7 million, for the construction of 42 affordable housing units
- Two loans, totaling \$1.4 million, for a senior housing complex providing seven affordable housing units
- Three loans, totaling \$4.2 million, that provided a community service for LMI individuals in the form of homeless shelters
- Six loans, totaling \$16 million, for the SBA (504) program that promoted economic development by creating and/or maintaining 290 permanent jobs
- One loan, for \$260 thousand, that helped stabilize an LMI area by financing a grocery store

The bank exhibits a good record of serving credit needs of the most economically disadvantaged area(s) of its assessment area, low-income individuals, and small businesses, consistent with the safe and sound banking practices.

In addition, SNB originated ten CD loans, totaling \$30.8 million, outside its AA during the evaluation period. All of the loans were for affordable housing and have no potential to benefit the bank's AA. However, these loans are acknowledged because they are located in the regional area and the bank has adequately met the community development needs of its AA.

Product Innovation and Flexibility

SNB makes limited use of innovative and/or flexible lending practices in order to serve the assessment area credit needs. In an effort to address the credit needs of low- or moderate-income individuals, the bank offers applicants with incomes of 80% or less of median family income unsecured loans in amounts from \$1.0 to \$3.0 thousand with terms up to 36 months. The bank's regular unsecured personal loan product has a minimum loan amount of \$3.0 thousand with a maximum term of 24 months. During the evaluation period, the bank originated 23 CRA Affordable Unsecured loans totaling \$48.0 thousand.

INVESTMENT TEST

The bank's performance under the investment test is rated low satisfactory. Based on full scope reviews, the bank's performance in the NY-NJ MD and Nassau-Suffolk MD for the NY-NJ-PA MMSA is rated adequate. In the PNM MSA, the bank's performance is rated needs improvement. Kingston MSA performance is rated poor, but is given little weight primarily due to limited branch presence. The bank expanded its AA to include Nassau-Suffolk in 2013 and has one branch that does not offer full services.

Refer to Table 14 in the full scope section for NY-NJ MD, Nassau-Suffolk MD, PNM MSA and Kingston MSA of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

SNB has an adequate level of qualified community development investment and grants, although rarely in a leadership position. The bank exhibits adequate responsiveness to credit and community economic development needs in the form of affordable housing. The bank occasionally uses innovative and/or complex investments to support community development initiatives.

During the evaluation period, the bank made traditional investments that supported affordable housing in its assessment area. The bank invested:

- \$6.1 million in four FNMA loan pools that were secured by multifamily and single-family residential properties that provide affordable housing to low- and moderate-income individuals, one in the Nassau-Suffolk MD and the remainder NY-NJ MD.
- \$10.4 million in four FNMA DUS bonds that financed multifamily residential properties that provides affordable housing to low- and moderate-income individuals, one PNM MSA and the remainder in NY-NJ MD.
- \$750 thousand in a New York State Housing Finance Agency Bond that financed a multifamily residential property that provides affordable housing to low- and moderate-income individuals in the NY-NJ MD.

Legacy Sterling National Bank made the following investments that remain outstanding as of the evaluation date and benefit the bank's assessment area:

- \$1.3 million in a FNMA loan pool secured by residential properties that provide affordable housing to low- and moderate-income individuals in the bank's AA.
- \$4.8 million in a CRA Qualified Investment Fund that invests in debt securities and other debt instruments such as FNMA and GNMA loan pools that have a primary purpose of providing affordable housing in the bank's AA.
- \$250 thousand certificate of deposit at a minority-owned financial institution in the AA.
- \$100 thousand certificate of deposit at a low-income credit union in the AA.

The bank made donations totaling \$45 thousand to *Gateway to Entrepreneurial Tomorrows, Inc. (GET)* which is a nonprofit organization that promotes economic development from the bottom up in the underserved urban and rural areas across the Mid-Hudson Valley region of New York State. GET's free services primarily help women, minorities and low-income individuals that want to start or expand their businesses. The Provident Bank Charitable Foundation made a broad array of grants totaling \$77

thousand to organizations that provide affordable housing and community services to low- and moderate-income individuals in the assessment area.

Finally, during 2013 the bank donated office equipment to the following community development organizations:

- Visions Services for the Blind and Visually Impaired –a 501c3 nonprofit rehabilitation and social service agency that provides employment training and job development.
- Hasco Community Center, Inc. –a nonprofit community organization that provides service-based solutions to the welfare and other economic, health and social dilemmas immigrant individuals and their families face.

SERVICE TEST

The bank's performance under the service test is rated high satisfactory. Based on full scope reviews, the bank's performance in the NY-NJ MD and Nassau-Suffolk MD for the NY-NJ-PA MMSA, Kingston MSA, and PNM MSA are rated good.

Retail Banking Services

Refer to Table 15 in the full scope section for NY-NJ MD, Nassau-Suffolk MD, PNM MSA and Kingston MSA of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

SNB has 31 branches, with 30 branches in New York and one in New Jersey (excluding the two branches in NYS Non-MSA) available to geographies and individuals of different income levels. The branch network includes 18 branches in the NY-NJ MD: 12 branches in Rockland County, two in New York County and two in Westchester County, one in Putman and one in Bergen County. There are eleven branches in Orange County, PNM MSA, as well as one in Suffolk County, Nassau-Suffolk MD and one in Ulster County, Kingston MSA.

SNB's delivery systems are reasonably accessible to essentially all portions of this assessment area. One (3.0%) branch is located in a low-income geography, one (3.0%) branch is in a moderate-income geography, thirteen (42.0%) branches are in middle-income geographies, and fourteen (45.0 %) are in upper-income geographies, two (6.0%) branches are in areas where the census tract data is unknown geographies. The 2010 census indicated there are 3,199 tracts in the AA when excluding Non-MSA Sullivan, of which 319 or 9.97% represents low-income tracts and 700 or 21.88% are moderate-income tracts or geographies. The proportion of SNB branches in low- or moderate-income geographies is 6.45%.

The distribution of branches in the assessment area is satisfactory. To the extent changes have been made, SNBs' opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The accessibility of SNB's delivery systems improved during the evaluation period with an increase of five branches through bank openings and merger/acquisition during the period. Three new branches were opened and one branch was acquired through the merger/acquisition of Gotham Bank of New York in August 2012. Of the five branches added in the evaluation period, one is in a middle-

income geography, two are in upper-income geographies, and two are in areas where the census tract data is unknown geographies. The bank also closed seven branches during the evaluation period of which none was located in low- or moderate-income geographies.

SNB's services, including business hours, where appropriate, do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals. Full retail services are offered at 25 branches in this AA. Services offered by SNB include a full line of deposit and lending products for consumers and businesses, and services such as Internet Banking with Bill Pay, Mobile Banking, and remote deposit capture. All branches provide ATMs, bank-by-mail, bank-by-phone, and internet banking. Most branches also offer weekend service, and each remains open late at least one day of the week. Any differences such as ATM drive-up, variation in hours and locations of coin counting machines are not arbitrary.

Community Development Services

SNB provides a relatively high level of community development services. The CRA Officer is on the board of the Rockland Housing Action Coalition, an organization that provides affordable housing to low- and moderate-income individuals. A VP/Managing Director of the Commercial Loan Department is a member of the Revolving Loan Fund Committee of the Rockland Economic Development Corporation that promotes economic development by supporting job creation, retention, and improvement for persons in the community including low- and moderate-income persons and geographies. The EVP/Market President of NYC Metro is an advisory board member for the Neighborhood Housing Services of NYC, a non-profit organization, with a goal of providing affordable housing to low- and moderate-income individuals throughout all of New York City. Finally, one of the bank's sales associates serves as the treasurer of the Martin Luther King Multi-Purpose Center, a nonprofit organization that promotes community development services.

SNB participated in a number of community development services. The bank has an active partnership with homeownership counseling agencies; namely, the Rockland Housing Action Coalition (RHAC) and other HUD-approved counseling agencies. The bank continued its commitment to affordable housing and making homeownership possible for the first time homebuyer through its participation in the First Home Club. The First Home Club is a Federal Home Loan Bank of New York (FHLB NY) savings program that provides down payment assistance for first time homebuyers. The program provides a 4:1 match for qualified LMI families who sign up for initial counseling and open a designated savings account. Each dollar the family saves in this account is matched \$4 up to a maximum of \$7,500. Families are counseled before they are enrolled in the program to ensure that they understand their commitment to save the pre-determined amount on a monthly basis in the designated savings account. A total of fourteen families were enrolled in the First Home Club during the evaluation period. Interest free loans are made through Habitat for Humanity to LMI individuals who will reside in distressed properties that are rehabbed by this not-for-profit entity; the bank serviced seven of these loans during the evaluation period. The bank also provided fourteen financial literacy seminars to low- and moderate-income individuals on first-time home-buying experience. These seminars were performed in partnership with homeownership counseling agencies. The bank also was involved in the Affordable Housing Program (AHP) administered by the FHLB NY that facilitates affordable housing construction and rehabilitation or development of affordable housing.

State Rating

State of New York

CRA Rating for New York State²: Low Satisfactory

The lending test is rated: Low Satisfactory

The investment test: Needs to Improve

The service test is: Low Satisfactory

The major factors that support this rating include:

- Lending performance in Non-MSA is adequate.
- Distribution of loans by income level of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different size.
- Responsiveness to credit needs of highly economically disadvantaged geographies, low-income persons, and small businesses is adequate.
- The bank's performance under the service test is adequate.
- The investment test in New York State is rated needs to improve.

Description of Institution's Operations in New York State

Refer to the market profiles for the NYS Non-MSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York State

The scope of evaluation consists of analysis of the towns of Mamakating, Forestburgh, Thompson and Fallsburg, in Sullivan County, New York a Non-MSA compared to New York State. The evaluation period for the Lending Test for home mortgages reported under the Home Mortgage Disclosure Act (HMDA) and loans to small businesses is from January 1, 2011 through September 30, 2013. For community development (CD) loans, services, and investments, the evaluation period is from November 1, 2010 through January 20, 2014. The CD investments also include outstanding CD investments made by legacy Sterling National Bank after January 1, 2012.

In our evaluation of lending, we evaluated two periods separately, 2011, and 2012 to 2013. The separation is due to the difference in census information used for each period. The 2000 Census information was used for the 2011 period, and the 2010 Census information was used for the 2012 to 2013 period. We included the lending tables for 2011 and 2012 to 2013 within this PE. The lending

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating.

tables for 2012 to 2013 included the most recent market share data available. CD loan and investment data presented in the tables cover 2011 to 2013. The branch distribution contained in Table 15 represents branch locations by income classification per the 2010 Census.

Refer to the table in Appendix A for more information.

LENDING TEST

The bank's performance under the lending test in New York State is rated satisfactory. Based on a full-scope review, the bank's performance in the NYS Non-MSA is adequate.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in Appendix D for the facts and data used to evaluate the bank's lending activity.

The lending levels reflect adequate responsiveness to assessment area credit needs.

Distribution of Loans by Income Level of the Geography

Geographic distribution of loans is satisfactory and reflects adequate penetration throughout the NYS Non-MSA.

All information for the year 2011 is derived from 2000 Census Data. All information for the years 2012-2013 is derived from 2010 Census Data.

Sullivan County consists of 54 census tracts of which the bank had 10 census tracts within the Non-MSA. During the evaluation period, there were no low-income geographies in the Non-MSA. Therefore, analysis of the geographic distribution of home mortgage loans in low-income geographies in Non-MSA Sullivan over the evaluation period is not applicable.

Overall loan volume for the bank in Sullivan County was low and not highly material in the overall analysis. In 2011, geographic distribution of home mortgage loans to moderate-income tracts reflects very poor penetration. Moderate-income geographies consist of 5.32% of owner-occupied units and 5.62% of multi-family loans in the Non-MSA. The bank had one moderate tract and did not purchase or originate home mortgage loans. Therefore, in-depth analysis of the geographic distribution of home mortgage loans is not meaningful for the performance in the year of 2011.

In 2012 and 2013, the bank had three moderate tracts. This section will only analyze and discuss the lending performed in the years of 2012-2013 for the moderate-income geographies.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the NYS Non-MSA under the full review section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Home Purchase Loans

The bank made two home purchase loans in 2012-2013, in this Non-MSA. The bank made 50% of home purchase loans in moderate-income geographies at 50.00%, which exceeds the overall percentage of owner-occupied units at 17.20%. However, with only two loans made in 2012 and 2013 there is not enough lending to have the home purchase loans significantly weigh in the overall performance of the geographic distribution of the SNB's home mortgage loans.

Home Improvement Loans

Geographic distribution of home improvement loans in 2012 and 2013 reflects very poor penetration to moderate- income geographies, but does not hold significant weight given the limited number of overall home improvement loans made by the bank in the review period. In 2012 and 2013, of owner occupied units in this Non-MSA, 17.20% were in moderate-income geographies, but the bank did not originate home improvement loans to moderate-income geographies.

Home Refinance Loans

Geographic distribution of home refinance loans in 2012 and 2013 reflects adequate penetration to moderate- income geographies. In 2012 and 2013, the bank percentage of home refinance loans made in moderate-income geographies is 12.50% and somewhat lower than the 17.20% of owner-occupied units.

Multifamily

Geographic distribution of multi-family loans in 2012 and 2013 reflects adequate penetration to moderate-income geographies, although the bank only made two loans for this review period. In 2012 and 2013, the bank percentage of multi-family loans that were made in moderate-income geographies is 50.00%, which is somewhat lower than the 59.44% of owner-occupied units.

Small Loans to Businesses

Sullivan County consists of 54 census tracts of which the bank had 10 census tracts within the Non-MSA. During the evaluation period, there were no low-income geographies in the Non-MSA. Therefore, analysis of the geographic distribution of small loans to businesses in low- income geographies in Non-MSA Sullivan over the evaluation period is not applicable.

Refer to Table 6 in the NYS Non-MSA under the full review section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Geographic distribution of small business loans reflects adequate penetration throughout the Non-MSA. In 2011, the bank purchased twelve small business loans in this Non-MSA, 8.33% of those small loans to businesses were in moderate- income tracts which exceeds 5.47% of businesses in those tracts. The bank originated ten small business loans in 2012 and 2013. The bank's performance was poor, as only 10% of its loans were in moderate-income geographies, while 36.92% of overall small businesses were in moderate-income geographies. SNB has 4.76% market share in lending small loans to businesses in moderate-income areas in the Non-MSA for 2011; however, this level dropped to 0.80% in 2012 and

2013. The decrease in the bank's small business lending in Sullivan County somewhat reflects the general business climate in that county and surrounding markets, which remains depressed for small businesses. The economy continues to be soft in that market, and as the bank seeks a limited number of opportunities for viable small business loans in that county, the competition is making up for the lower percentage of all small business lending.

Lending Gap Analysis

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in SNB's lending patterns.

Distribution of Loans by Income Level of the Borrower

Distribution of loans by income level of borrowers is satisfactory. The distribution of borrowers reflects, given the product of lines offered by the bank, adequate penetration among retail customers of different income levels and business customers of different size. The analysis of the borrower distribution for refinance loans in the NYS Non-MSA is not meaningful, as the bank did not make loans to low- or moderate-income borrowers.

We considered demographic factors including the high cost of housing compared to the median family income of a low-income person, and the high percentage of individuals below the poverty level, in our home mortgage analysis.

All information for the year 2011 is derived from 2000 Census Data. All information for the years 2012-2013 is derived from 2010 Census Data.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the NYS Non-MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

The distribution of the bank's home purchase loans by income level of the borrowers in the Non-MSA reflects poor penetration.

In 2011, the percentage of purchase loans made to low- income borrowers at 100% exceeds the 20.38% of low- income families in the Non-MSA. No loans were made to moderate- income families in this Non-MSA. Opportunities for lending in this Non-MSA are limited in light of housing availability and income levels of borrowers. During 2011, the median cost of housing in the NYS Non-MSA was \$88,411. The HUD adjusted median family income is \$56,100. As such, a low-income individual earns less than \$28,050. A moderate- income individual earns at least \$28,050 and less than \$44,880. Based on this data, moderate-income individuals would have difficulty to afford a home in this Non-MSA.

In 2012 through 2013, the borrower distribution reflected very poor penetration. The bank made two home purchase loans in this MSA, which was the same amount of lending generate in 2011. However, no home purchase mortgage loans were made to low- or moderate- income borrowers, where as in 2011 both of the two loans originations were provided to low-income borrowers. During 2013, the median

cost of housing more than doubled to \$180,142. The HUD adjusted median family income made a decrease of \$57,700 above-mentioned. Additionally, 16.0% of households are below the poverty level.

Home Improvement Loans

Borrower distribution for home improvement loans reflects adequate penetration. The lending to low-income borrowers is very poor and needs to improve. However, SNB performance with lending home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent.

During the evaluation period, there were no improvement loans made to low-income borrowers; this was significantly lower than the percentage of low-income families within this Non-MSA. There were 20.38% and 21.93% of low-income families in this Non-MSA, in 2011 and 2012-2013, respectively.

In 2011, the percentage of loans in moderate-income borrowers at 50% exceeds the percentage of moderate-income families at 16.46%. In 2012 and 2013, the percentage of home improvement loans made to moderate-income borrowers at 25% exceeds the percentage of moderate-income families at 17.83%.

Home Refinance Loans

Borrower distribution for home refinance loans reflects very poor penetration. The bank generated only one loan in this Non-MSA in 2011 and eight loans in 2012 and 2013. The bank made no loans to low- or moderate-income borrowers during the evaluation period. However, there were over 15% of low- and moderate-income borrowers in this Non-MSA for each year that the bank was unable to penetrate.

Small Loans to Businesses

Refer to Table 11 in NYS Non-MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of the bank's small loans to small businesses is adequate. During the evaluation period, the business demographic summary in reports the majority of SNB's small business loans originations in this Non-MSA were made to minority women owners, for \$500 thousand or less in the service business, or with an employee size no more than 4 employees. Small loans to businesses (businesses with revenues of \$1 million or less) represents 1.83% of all small loans to businesses originated by SNB in 2011, and 2.00% in 2012-2013 within this Non-MSA. In 2011, the bank's percentage of small loans is equal to the 68.00% of businesses with revenues of \$1 million or less. However, despite a decline in small business loan originations, the bank's distribution of small loans to businesses is lower than the 73.94% of business with revenues of \$1 million or less. The distribution of loans by original amount regardless of business size shows a majority (58.33% based on 2000 Census Data and 50.00% based on 2010 Census Data) of the loan originations are for \$100,000 or less.

Community Development Lending

Refer to Table 1 Lending Volume in the NYS Non-MSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank's overall community development lending in the Non-MSA area relative to CD lending opportunities in the area is low. The bank did not make any community development loans in Sullivan County; however the bank is receiving positive consideration for community development loans that are located in the broader statewide area of New York. The bank funded two loans totaling \$450 thousand as part of the Small Business Recovery Loan Fund established by the New York Bankers Association, New York Business Development Corporation and the State of New York to assist small businesses located in federally declared disaster areas in New York State impacted by Superstorm Sandy.

In addition, SNB originated ten CD loans, totaling \$30.8 million, outside its AA during the evaluation period. All of the loans were for affordable housing and have no potential to benefit the bank's AA. However, these loans are acknowledged because they are located in the regional area and the bank has adequately met the community development needs of its AA.

Product Innovation and Flexibility

SNB makes limited use of innovative and/or flexible lending practices in order to serve the assessment area credit needs. The six loans identified as SBA (504) loans were in partnership with the New York Business Development Corporation (NYBDC) and Empire State CDC. The NYBDC's goal is to assist, promote and, through lending partners aid in the advancement of business prosperity and economic welfare of New York State by providing loans to small businesses including start-ups, early stage and mature businesses with a particular emphasis on minority and women-owned businesses. The SBA (504) program provides more flexible underwriting by providing financing for small businesses for up to 90.0% of a project, which would not otherwise be available to a small business through conventional loan programs.

INVESTMENT TEST

The bank's performance under the investment test in New York State is rated needs to improve. Based on full-scope review, the bank's performance in the Non-MSA Sullivan is poor. The bank did not originate any community development investments or provide grant funding or donations in the NYS Non-MSA. However, SNB did make investments that benefit a broader statewide area including the bank's assessment area. The bank invested:

- \$1.8 million in a low-income housing tax credit fund that supports affordable housing rental projects in New York State
- \$250 thousand in the New York Business Development Corporation that promotes economic development and job creation by providing loans to small businesses, minority and women-owned businesses in New York State

The NYS Non-MSA investment rating receives less weight than the larger NY CSA, due to mitigating factors, which include the Non-MSA, consists only of four towns within this county, and has only two branches.

Refer to Table 14 in the NYS Non-MSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

SERVICE TEST

The bank's performance under the service test is rated satisfactory. Based on full scope reviews, the bank's performance in the NYS Non-MSA is rated adequate.

Retail Banking Services

Refer to Table 15 in the state of NYS Non-MSA Sullivan section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

SNB's delivery systems are accessible to essentially all geographies and individuals of different income levels within this county, based upon population demographics and locations of the bank's branches and ATMs. In the Non-MSA Sullivan, there are no low-income geographies. SNB has 33 branches, with 32 branches in New York and one in New Jersey; two branches are available in the two towns of Forestburgh and South Fallsburg. The 2010 census indicated there are 10 tracts in the Non-MSA, of which three are moderate tracts. The two branch locations in the Non-MSA are moderate and middle income. No branches have been opened or closed during the evaluation period in the Non-MSA Sullivan and has not adversely affected the accessibility its delivery systems.

SNB's services, including business hours, where appropriate, do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals. Full retail services are offered at the two branches. Services offered by SNB include a full line of deposit and lending products for consumers and businesses, and services such as Internet Banking with Bill Pay, Mobile Banking, and remote deposit capture. The branches provide ATMs, bank-by-mail, bank-by-phone, and internet banking. Most branches also offer weekend service, and each remains open late at least one day of the week. Any differences such as ATM drive-up, variation in hours and locations of coin counting machines are not arbitrary.

Community Development Services

SNB provides a limited level of community development services in this non-MSA. SNB participated in affordable housing and making homeownership possible for first time homebuyers through its participation in the First Home Club. The First Home Club is a Federal Home Loan Bank of New York (FHLBNY) savings program that provides down payment assistance for first time homebuyers. SNB is an approved participant in this program and collaborated with homeownership counseling agencies to offer this program to income-qualified families that wish to save towards a down payment or closing cost for their first home.

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Sterling National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Sterling National Bank	Low Satisfactory	Low Satisfactory	High Satisfactory	Low Satisfactory
Multistate Metropolitan Area or State:				
New York-Newark-Jersey City, NY-NJ-PA	Low Satisfactory	Low Satisfactory	High Satisfactory	Low Satisfactory
New York State	Low Satisfactory	Needs to Improve	Low Satisfactory	Low Satisfactory

() The lending test is weighted more heavily than the investment and service tests in the overall rating.*

Appendix C: Market Profiles for Full-Scope Areas

New York-Wayne, White Plains, NY-NJ MD-35644

Demographic Information for Full Scope Area: 35644 New York-White Plains-Wayne NY-NJ MD 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,543	11.76	23.59	28.75	33.27	2.63
Population by Geography	9,972,029	13.76	25.63	25.81	34.56	0.24
Owner-Occupied Housing by Geography	1,431,978	2.54	12.31	27.77	57.38	0.00
Business by Geography	829,119	7.32	16.90	21.81	51.40	2.57
Farms by Geography	6,429	2.63	9.38	19.43	67.83	0.73
Family Distribution by Income Level	2,294,838	26.16	15.57	16.11	42.16	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	957,736	24.40	35.87	24.74	14.99	0.01
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		64,171 66,000 16%		Median Housing Value Unemployment Rate (2010 US Census)	524,718 8.30%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

Demographic Information for Full Scope Area: 35644 New York-White Plains-Wayne NY-NJ MD 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	400	1.50	5.00	18.75	74.00	0.75
Population by Geography	1,916,069	1.37	4.40	18.67	75.56	0.00
Owner-Occupied Housing by Geography	446,996	0.25	1.10	10.84	87.81	0.00
Business by Geography	215,880	0.94	4.24	17.07	77.74	0.02
Farms by Geography	3,279	0.55	1.92	14.55	82.98	0.00
Family Distribution by Income Level	499,245	11.19	10.70	15.17	62.95	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	109,247	3.61	10.60	29.66	56.13	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		49,461 67,400 7%		Median Housing Value Unemployment Rate (2000 US Census)	255,636 8.90%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Poughkeepsie-Newburgh-Middletown, NY MSA (Orange County)-31900

Demographic Information for Full Scope Area: 39100 Pough-New-Middle MSA (Orange County) 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	79	8.86	17.72	50.63	22.78	0.00
Population by Geography	372,813	9.05	14.87	50.67	25.41	0.00
Owner-Occupied Housing by Geography	88,633	2.77	11.65	55.28	30.31	0.00
Business by Geography	28,852	7.73	13.32	52.62	26.34	0.00
Farms by Geography	1,012	1.19	5.34	57.31	36.17	0.00
Family Distribution by Income Level	90,356	21.17	17.78	21.86	39.19	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	35,193	14.28	22.55	48.17	14.99	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		82,963 85,800 9%	Median Housing Value Unemployment Rate (2010 US Census)		304,519 7.00%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2013 HUD updated MFI

Demographic Information for Full Scope Area: 39100 Poughkeepsie-Newburgh-Middle, NY MSA (Orange County) 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	67	7.46	20.90	52.24	19.40	0.00
Population by Geography	341,367	9.09	15.04	56.66	19.20	0.00
Owner-Occupied Housing by Geography	76,948	2.49	10.51	63.36	23.64	0.00
Business by Geography	34,154	8.33	13.21	58.69	19.78	0.00
Farms by Geography	1,026	0.88	5.26	61.01	32.85	0.00
Family Distribution by Income Level	85,028	20.71	18.19	24.08	37.02	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	33,075	14.36	21.51	52.33	11.81	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		61,652 86,100 9%	Median Housing Value Unemployment Rate (2000 US Census)		146,546 7.80%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

Kingston, NY MSA (Ulster County) -28740

Demographic Information for Full Scope Area: 28740 Kingston NY MSA (Ulster Counties) 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0.00	22.22	55.56	22.22	0.00
Population by Geography	40,515	0.00	16.54	65.10	18.35	0.00
Owner-Occupied Housing by Geography	10,314	0.00	14.29	64.17	21.54	0.00
Business by Geography	2,791	0.00	17.77	57.47	24.76	0.00
Farms by Geography	174	0.00	8.05	63.79	28.16	0.00
Family Distribution by Income Level	9,796	21.82	16.74	22.06	39.38	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,777	0.00	28.86	56.08	15.06	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		70,513 69,800 11%	Median Housing Value Unemployment Rate (2010 US Census)		244,267 7.80%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

Demographic Information for Full Scope Area: 28740 Kingston NY MSA (Ulster County -4 towns) 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	10.00	60.00	30.00	0.00
Population by Geography	37,167	0.00	12.93	61.27	25.80	0.00
Owner-Occupied Housing by Geography	9,009	0.00	8.46	65.20	26.34	0.00
Business by Geography	3,165	0.00	13.33	56.49	30.17	0.00
Farms by Geography	179	0.00	6.15	61.45	32.40	0.00
Family Distribution by Income Level	8,792	20.06	16.46	24.32	39.16	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,211	0.00	19.81	62.60	17.60	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		51,753 72,900 11%	Median Housing Value Unemployment Rate (2000 US Census)		112,706 8.30%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

New York State Non-MSA (Sullivan County)

Demographic Information for Full Scope Area: NYS Non-MSA (Sullivan County -4 towns) 2012-13						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	30.00	30.00	40.00	0.00
Population by Geography	41,082	0.00	28.89	26.50	44.61	0.00
Owner-Occupied Housing by Geography	9,372	0.00	17.20	27.97	54.83	0.00
Business by Geography	2,671	0.00	36.92	26.73	36.35	0.00
Farms by Geography	77	0.00	19.48	22.08	58.44	0.00
Family Distribution by Income Level	9,692	21.93	17.83	17.87	42.38	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,853	0.00	39.45	25.93	34.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		54,294 57,700 16%	Median Housing Value Unemployment Rate (2010 US Census)		180,142 7.30%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

Demographic Information for Full Scope Area: NYS Non-MSA (Sullivan County -4 towns) 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	10.00	70.00	20.00	0.00
Population by Geography	38,258	0.00	6.51	65.81	27.67	0.00
Owner-Occupied Housing by Geography	8,696	0.00	5.32	58.45	36.22	0.00
Business by Geography	3,275	0.00	5.47	65.53	29.01	0.00
Farms by Geography	71	0.00	0.00	66.20	33.80	0.00
Family Distribution by Income Level	9,217	20.38	16.76	19.17	43.69	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,423	0.00	9.96	68.16	21.88	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		41,761 56,100 16%	Median Housing Value Unemployment Rate (2000 US Census)		88,411 8.20%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Nassau-Suffolk, NY MD-35004

Demographic Information for Full Scope Area: 35004 Nassau-Suffolk (Western) NY MD 2013						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	568	2.29	14.79	57.92	23.59	1.41
Population by Geography	2,659,205	2.47	16.86	58.52	21.99	0.15
Owner-Occupied Housing by Geography	712,770	1.10	12.86	60.78	25.26	0.00
Business by Geography	267,304	1.62	13.53	58.06	26.79	0.01
Farms by Geography	4,923	2.28	17.63	58.89	21.21	0.00
Family Distribution by Income Level	669,038	18.64	18.32	23.83	39.20	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	247,288	3.42	23.58	58.90	14.10	0.00
Median Family Income		101,543	Median Housing Value		485,900	
HUD Adjusted Median Family Income for 2013		105,900	Unemployment Rate (2010 US Census)		7.40%	
Households Below Poverty Level		5%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2013 HUD updated MFI

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.

- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.

- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												
Geography: 2011 SNB PE REPORTS						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
28740 Kingston NY MSA (Ulster County -4 towns) 2011	5.48	11	1,012	39	3,288	0	0	0	0	50	4,300	17.99
35644 New York-White Plains-Wayne NY-NJ MD 2011	47.86	141	29,163	296	37,753	0	0	2	3,949	437	66,916	17.99
39100 Pough-New-Middle MSA (Orange County) 2011	44.80	88	11,425	310	32,954	11	1,305	3	8,765	409	45,684	46.04
NYS Non MSA (Sullivan County -4 towns) 2011	1.86	5	590	12	3,123	0	0	0	0	17	3,713	17.99
LENDING VOLUME												
Geography: 2012-13 SNB PE REPORT						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
28740 Kingston NY MSA (Ulster County-4 towns) 2012-13	2.94	27	2,383	10	3,438	0	0	0	0	37	5,821	0.00
35004 Nassau-Suffolk (Western) NY MD 2013	1.67	15	17,597	6	2,254	0	0	0	0	21	19,851	0.00
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	62.99	439	246,479	351	100,587	3	182	14	30,868	793	347,248	0.00
39100 Pough-New-Middle MSA (Orange County) 2012-13	30.34	245	41,470	122	26,885	15	2,162	3	8,975	382	70,517	0.00
NYS Non MSA (Sullivan County -4 towns) 2012-13	2.07	16	3,520	10	2,499	0	0	0	0	26	6,019	0.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2013 to December 31, 2013.

*** Deposit Data as of February 21, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products *(the bank reported no activity for the information collected on this page)*

LENDING VOLUME		Geography: 2011 SNB PE REPORTS				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011								
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:														
28740 Kingston NY MSA (Ulster County -4 towns) 2011	0.00	0	0	0	0	0	0	0	0	0	0	0	0	17.99
35644 New York-White Plains-Wayne NY-NJ MD 2011	0.00	0	0	0	0	0	0	0	0	0	0	0	0	17.99
39100 Pough-New-Middle MSA (Orange County) 2011	0.00	0	0	0	0	0	0	0	0	0	0	0	0	46.04
NYS Non MSA (Sullivan County -4 towns) 2011	0.00	0	0	0	0	0	0	0	0	0	0	0	0	17.99
LENDING VOLUME		Geography: 2012-13 SNB PE REPORT				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:														
28740 Kingston NY MSA (Ulster County Partial) 2012-13	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
35004 Nassau-Suffolk (Western) NY MD 2013	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
39100 Pough-New-Middle MSA (Orange County) 2012-13	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
NYS Non MSA (Sullivan County -4 towns) 2012-13	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.
 *** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.
 * Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.
 *** Deposit Data as of February 21, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products *(the bank reported no activity for the information collected on this page)*

LENDING VOLUME		Geography: 2011 SNB PE REPORTS		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
Assessment Area (2011):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
28740 Kingston NY MSA (Ulster County-4 towns) 2011	0	0	0	0	
35644 New York-White Plains-Wayne NY-NJ MD 2011	0	0	0	0	
39100 Pough-New-Middle MSA (Orange County) 2011	0	0	0	0	
NYS Non MSA (Sullivan County-4 towns) 2011	0	0	0	0	
LENDING VOLUME		Geography: 2012-13 SNB PE REPORT		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
28740 Kingston NY MSA (Ulster County-4 towns) 2012-13	0	0	0	0	
35004 Nassau-Suffolk (Western) NY MD 2013	0	0	0	0	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	0	0	0	0	
39100 Pough-New-Middle MSA (Orange County) 2012-13	0	0	0	0	
NYS Non MSA (Sullivan County-4 towns) 2012-13	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2011	1	2.13	0.00	0.00	8.46	0.00	65.20	0.00	26.34	100.00	1.37	0.00	0.00	1.74	1.20	
35644 New York-White Plains-Wayne NY-NJ MD 2011	29	61.70	0.25	0.00	1.10	0.00	10.84	3.45	87.81	96.55	0.20	0.00	0.00	0.11	0.22	
39100 Pough-New-Middle MSA (Orange County) 2011	15	31.91	2.49	0.00	10.51	6.67	63.36	46.67	23.64	46.67	0.68	0.00	0.32	0.68	1.10	
NYS Non MSA (Sullivan County- 4 towns) 2011	2	4.26	0.00	0.00	5.32	0.00	58.45	50.00	36.22	50.00	0.95	0.00	0.00	0.95	1.16	
Geographic Distribution: HOME PURCHASE		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	1	1.06	0.00	0.00	14.29	0.00	64.17	0.00	21.54	100.00	0.00	0.00	0.00	0.00	0.00	
35004 Nassau-Suffolk (Western) NY MD 2013	5	5.32	1.10	0.00	12.86	20.00	60.78	0.00	25.26	80.00	0.00	0.00	0.00	0.00	0.02	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	64	68.09	2.54	4.69	12.31	9.38	27.77	9.38	57.39	76.56	0.05	0.00	0.02	0.02	0.07	
39100 Pough-New-Middle MSA (Orange County) 2012-13	22	23.40	2.77	0.00	11.65	0.00	55.28	54.55	30.31	45.45	0.47	0.00	0.00	0.61	0.46	
NYS Non MSA (Sullivan County -4 towns) 2012-13	2	2.13	0.00	0.00	17.20	50.00	27.97	50.00	54.83	0.00	0.98	0.00	3.57	1.92	0.00	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

* Based on 2012 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2011	2	3.45	0.00	0.00	8.46	50.00	65.20	50.00	26.34	0.00	3.23	0.00	0.00	4.76	0.00	
35644 New York-White Plains-Wayne NY-NJ MD 2011	30	51.72	0.25	0.00	1.10	0.00	10.84	0.00	87.81	100.00	0.50	0.00	0.00	0.00	0.55	
39100 Pough-New-Middle MSA (Orange County) 2011	24	41.38	2.49	0.00	10.51	0.00	63.36	54.17	23.64	45.83	1.85	0.00	0.00	1.84	2.50	
NYS Non MSA (Sullivan County-4 towns) 2011	2	3.45	0.00	0.00	5.32	0.00	58.45	50.00	36.22	50.00	0.00	0.00	0.00	0.00	0.00	
Geographic Distribution: HOME IMPROVEMENT		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	8	6.02	0.00	0.00	14.29	12.50	64.17	75.00	21.54	12.50	10.26	0.00	25.00	13.04	0.00	
35004 Nassau-Suffolk (Western) NY MD 2013	0	0.00	1.10	0.00	12.86	0.00	60.78	0.00	25.26	0.00	0.00	0.00	0.00	0.00	0.00	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	67	50.38	2.54	0.00	12.31	1.49	27.77	7.46	57.39	91.04	0.88	1.37	0.30	0.14	1.17	
39100 Pough-New-Middle MSA (Orange County) 2012-13	54	40.60	2.77	0.00	11.65	0.00	55.28	51.85	30.31	48.15	11.57	0.00	3.85	10.67	15.56	
NYS Non MSA (Sullivan County -4 towns) 2012-13	4	3.01	0.00	0.00	17.20	0.00	27.97	100.00	54.83	0.00	8.70	0.00	0.00	12.50	9.09	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

* Based on 2012 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2011	8	5.88	0.00	0.00	8.46	0.00	65.20	100.00	26.34	0.00	2.37	0.00	14.29	2.98	0.00	
35644 New York-White Plains-Wayne NY-NJ MD 2011	79	58.09	0.25	1.27	1.10	0.00	10.84	3.80	87.81	94.94	0.37	2.50	0.00	0.17	0.38	
39100 Pough-New-Middle MSA (Orange County) 2011	48	35.29	2.49	0.00	10.51	4.17	63.36	54.17	23.64	41.67	2.80	0.00	2.21	2.53	3.61	
NYS Non MSA (Sullivan County -4 towns) 2011	1	0.74	0.00	0.00	5.32	0.00	58.45	0.00	36.22	100.00	1.82	0.00	0.00	1.44	2.99	
Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	18	3.90	0.00	0.00	14.29	27.78	64.17	55.56	21.54	16.67	2.78	0.00	4.76	3.17	1.45	
35004 Nassau-Suffolk (Western) NY MD 2013	9	1.95	1.10	0.00	12.86	11.11	60.78	0.00	25.26	88.89	0.00	0.00	0.00	0.00	0.01	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	262	56.83	2.54	1.15	12.31	2.29	27.77	7.63	57.39	88.93	0.22	0.08	0.05	0.11	0.26	
39100 Pough-New-Middle MSA (Orange County) 2012-13	164	35.57	2.77	0.61	11.65	1.83	55.28	49.39	30.31	48.17	2.63	0.00	0.00	2.42	3.66	
NYS Non MSA (Sullivan County- 4 towns) 2012-13	8	1.74	0.00	0.00	17.20	12.50	27.97	25.00	54.83	62.50	1.11	0.00	0.00	2.02	0.75	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

* Based on 2012 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011									
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2011	0	0.00	0.00	0.00	53.89	0.00	23.75	0.00	22.36	0.00	0.00	0.00	0.00	0.00	0.00	
35644 New York-White Plains-Wayne NY-NJ MD 2011	3	75.00	2.29	0.00	10.24	0.00	29.43	0.00	58.04	100.00	1.31	0.00	0.00	0.00	2.11	
39100 Pough-New-Middle MSA (Orange County) 2011	1	25.00	15.19	0.00	27.78	0.00	50.87	100.00	6.16	0.00	10.00	0.00	0.00	14.29	0.00	
NYS Non MSA (Sullivan County -4 towns) 2011	0	0.00	0.00	0.00	5.62	0.00	89.61	0.00	4.77	0.00	0.00	0.00	0.00	0.00	0.00	
Geographic Distribution: MULTIFAMILY		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	0	0.00	0.00	0.00	59.24	0.00	25.63	0.00	15.14	0.00	0.00	0.00	0.00	0.00	0.00	
35004 Nassau-Suffolk (Western) NY MD 2013	1	1.85	8.43	0.00	27.33	100.00	50.95	0.00	13.29	0.00	1.06	0.00	5.00	0.00	0.00	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	46	85.19	17.80	19.57	27.25	36.96	21.17	13.04	33.77	30.43	0.97	2.33	1.16	0.54	0.69	
39100 Pough-New-Middle MSA (Orange County) 2012-13	5	9.26	19.80	20.00	19.83	0.00	48.33	40.00	12.04	40.00	16.13	16.67	0.00	16.67	50.00	
NYS Non MSA (Sullivan County -4 towns) 2012-13	2	3.70	0.00	0.00	59.44	50.00	22.85	50.00	17.71	0.00	40.00	0.00	0.00	66.67	0.00	

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

* Based on 2012 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2011	39	5.94	0.00	0.00	13.33	25.64	56.49	66.67	30.17	7.69	1.47	0.00	4.48	1.39	0.59	
35644 New York-White Plains-Wayne NY-NJ MD 2011	296	45.05	0.94	0.00	4.24	1.69	17.07	9.12	77.74	89.19	0.45	0.00	0.15	0.25	0.51	
39100 Pough-New-Middle MSA (Orange County) 2011	310	47.18	8.33	8.39	13.21	7.10	58.69	55.48	19.78	29.03	4.86	3.79	3.40	5.17	5.88	
NYS Non MSA (Sullivan County -4 towns) 2011	12	1.83	0.00	0.00	5.47	8.33	65.53	50.00	29.01	41.67	1.80	0.00	4.76	1.20	3.70	
Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	10	2.07	0.00	0.00	17.77	40.00	57.47	50.00	24.76	10.00	0.19	0.00	0.00	0.21	0.32	
35004 Nassau-Suffolk (Western) NY MD 2013	6	1.24	1.62	0.00	13.53	0.00	58.06	50.00	26.79	50.00	0.01	0.00	0.00	0.00	0.01	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	334	69.29	7.32	4.49	16.90	5.09	21.81	18.26	51.40	72.16	0.08	0.06	0.03	0.06	0.11	
39100 Pough-New-Middle MSA (Orange County -4 towns) 2012-13	122	25.31	7.73	4.10	13.32	4.92	52.62	58.20	26.34	32.79	0.99	0.11	0.55	1.24	1.33	
NYS Non MSA (Sullivan County Partial) 2012-13	10	2.07	0.00	0.00	36.92	10.00	26.73	50.00	36.35	40.00	1.01	0.00	0.80	1.08	1.62	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

* Based on 2012 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
28740 Kingston NY MSA (Ulster County - 4 towns) 2011	0	0.00	0.00	0.00	6.15	0.00	61.45	0.00	32.40	0.00	0.00	0.00	0.00	0.00	0.00									
35644 New York-White Plains-Wayne NY-NJ MD 2011	0	0.00	0.55	0.00	1.92	0.00	14.55	0.00	82.98	0.00	0.00	0.00	0.00	0.00	0.00									
39100 Pough-New-Middle MSA (Orange County) 2011	11	100.00	0.88	0.00	5.26	0.00	61.01	63.64	32.85	36.36	13.95	0.00	0.00	21.05	8.70									
NYS Non MSA (Sullivan County -4 towns) 2011	0	0.00	0.00	0.00	0.00	0.00	66.20	0.00	33.80	0.00	8.33	0.00	0.00	0.00	33.33									
Geographic Distribution: SMALL LOANS TO FARMS															Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography'													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	0	0.00	0.00	0.00	8.05	0.00	63.79	0.00	28.16	0.00	0.00	0.00	0.00	0.00	0.00									
35004 Nassau-Suffolk (Western) NY MD 2013	0	0.00	2.28	0.00	17.63	0.00	58.89	0.00	21.21	0.00	0.00	0.00	0.00	0.00	0.00									
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	3	16.67	2.63	0.00	9.38	0.00	19.43	0.00	67.83	100.00	0.00	0.00	0.00	0.00	0.00									
39100 Pough-New-Middle MSA (Orange County) 2012-13	15	83.33	1.19	0.00	5.34	0.00	57.31	26.67	36.17	73.33	12.00	0.00	0.00	10.00	16.67									
NYS Non MSA (Sullivan County -4 towns) 2012-13	0	0.00	0.00	0.00	19.48	0.00	22.08	0.00	58.44	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

* Based on 2012 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families ³	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
28740 Kingston NY MSA (Ulster County - 4 towns) 2011	1	2.13	20.06	0.00	16.46	0.00	24.32	0.00	39.16	0.00	1.02	0.00	1.85	0.00	1.14	
35644 New York-White Plains-Wayne NY-NJ MD 2011	29	61.70	11.19	3.70	10.70	3.70	15.17	14.81	62.95	77.78	0.22	1.10	0.41	0.15	0.22	
39100 Pough-New-Middle MSA (Orange County) 2011	15	31.91	20.71	20.00	18.19	13.33	24.08	6.67	37.02	60.00	0.76	1.49	0.48	0.23	1.34	
NYS Non MSA (Sullivan County - 4 towns) 2011	2	4.26	20.38	100.00	16.76	0.00	19.17	0.00	43.69	0.00	1.14	10.00	3.13	0.00	0.00	
Borrower Distribution: HOME PURCHASE		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
28740 Kingston NY MSA (Ulster County- 4 towns) 2012-13	1	1.06	21.82	0.00	16.74	100.00	22.06	0.00	39.38	0.00	0.00	0.00	0.00	0.00	0.00	
35004 Nassau-Suffolk (Western) NY MD 2013	5	5.32	18.64	0.00	18.32	0.00	23.83	0.00	39.20	100.00	0.01	0.00	0.00	0.00	0.01	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	64	68.09	26.16	0.00	15.57	7.27	16.11	18.18	42.16	74.55	0.05	0.00	0.18	0.05	0.04	
39100 Pough-New-Middle MSA (Orange County) 2012-13	22	23.40	21.17	9.52	17.78	23.81	21.86	14.29	39.19	52.38	0.53	0.58	0.32	0.35	0.85	
NYS Non MSA (Sullivan County - 4 towns) 2012-13	2	2.13	21.93	0.00	17.83	0.00	17.87	0.00	42.38	100.00	1.20	0.00	0.00	0.00	2.63	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 8.5% of loans originated and purchased by bank.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

* Based on 2012 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 12.8% of loans originated and purchased by bank.

4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share ⁷				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁵	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2011	2	3.45	20.06	0.00	16.46	50.00	24.32	0.00	39.16	50.00	3.33	0.00	12.50	0.00	0.00	
35644 New York-White Plains-Wayne NY-NJ MD 2011	30	51.72	11.19	0.00	10.70	6.67	15.17	16.67	62.95	76.67	0.52	0.00	1.89	0.89	0.35	
39100 Pough-New-Middle MSA (Orange County) 2011	24	41.38	20.71	0.00	18.19	41.67	24.08	25.00	37.02	33.33	1.94	0.00	5.45	1.32	1.03	
NYS Non MSA (Sullivan County- 4 towns) 2011	2	3.45	20.38	0.00	16.76	50.00	19.17	0.00	43.69	50.00	0.00	0.00	0.00	0.00	0.00	
Borrower Distribution: HOME IMPROVEMENT		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share ⁷				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁶	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	8	6.02	21.82	12.50	16.74	12.50	22.06	37.50	39.38	37.50	10.53	16.67	14.29	14.29	5.56	
35004 Nassau-Suffolk (Western) NY MD 2013	0	0.00	18.64	0.00	18.32	0.00	23.83	0.00	39.20	0.00	0.00	0.00	0.00	0.00	0.00	
35644 New York-WhitePlains-Wayne NY-NJ MD 2012-13	67	50.38	26.16	1.52	15.57	7.58	16.11	18.18	42.16	72.73	0.92	0.91	1.27	1.34	0.75	
39100 Pough-New-Middle MSA (Orange County) 2012-13	54	40.60	21.17	5.77	17.78	17.31	21.86	32.69	39.19	44.23	12.20	3.70	19.64	12.16	10.31	
NYS Non MSA (Sullivan County -4 towns) 2012-13	4	3.01	21.93	0.00	17.83	25.00	17.87	0.00	42.38	75.00	9.09	0.00	100.00	0.00	7.69	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

* Based on 2012 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by bank.

6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: 2011 SNB PE REPORTS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁷	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
28740 Kingston NY MSA (Ulster County -4 towns) 2011	8	5.88	20.06	14.29	16.46	71.43	24.32	14.29	39.16	0.00	2.17	5.00	5.08	2.17	0.66	
35644 New York-White Plains-Wayne NY-NJ MD 2011	79	58.09	11.19	0.00	10.70	2.56	15.17	20.51	62.95	76.92	0.42	0.00	0.29	0.54	0.42	
39100 Pough-New-Middle MSA (Orange County) 2011	48	35.29	20.71	6.52	18.19	10.87	24.08	30.43	37.02	52.17	3.16	3.20	2.92	2.89	3.45	
NYS Non MSA (Sullivan County-towns) 2011	1	0.74	20.38	0.00	16.76	0.00	19.17	0.00	43.69	100.00	2.29	0.00	4.55	3.33	1.69	
Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: 2012-13 SNB PE REPORT					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁸	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
28740 Kingston NY MSA (Ulster County -towns) 2012-13	18	3.90	21.82	5.88	16.74	17.65	22.06	29.41	39.38	47.06	3.07	0.00	3.17	3.39	3.11	
35004 Nassau-Suffolk (Western) NY MD 2013	9	1.95	18.64	0.00	18.32	0.00	23.83	0.00	39.20	100.00	0.00	0.00	0.00	0.00	0.01	
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	262	56.83	26.16	1.20	15.57	7.17	16.11	16.73	42.16	74.90	0.24	0.20	0.30	0.29	0.23	
39100 Pough-New-Middle MSA (Orange County) 2012-13	164	35.57	21.17	5.10	17.78	15.29	21.86	37.58	39.19	42.04	3.02	2.90	3.05	3.17	2.92	
NYS Non MSA (Sullivan County - 4 towns) 2012-13	8	1.74	21.93	0.00	17.83	0.00	17.87	37.50	42.38	62.50	1.32	0.00	0.00	0.00	1.88	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.

⁷ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

* Based on 2012 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.1% of loans originated and purchased by bank.

⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: 2011 SNB PE REPORTS			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
28740 Kingston NY MSA (Ulster County -4 towns) 2011	39	5.94	71.91	79.49	84.62	7.69	7.69	1.47	0.54
35644 New York-White Plains-Wayne NY-NJ MD 2011	296	45.05	68.81	60.81	73.31	12.84	13.85	0.45	0.44
39100 Pough-New-Middle MSA (Orange County) 2011	310	47.18	68.84	70.32	81.61	8.06	10.32	4.86	3.13
NYS Non MSA (Sullivan County -4 towns) 2011	12	1.83	68.00	66.67	58.33	8.33	33.33	1.80	1.51
Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012-13 SNB PE REPORT			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
28740 Kingston NY MSA (Ulster County- 4 towns) 2012-13	10	2.00	75.82	20.00	40.00	10.00	50.00	0.19	0.18
35004 Nassau-Suffolk (Western) NY MD 2013	6	1.20	76.39	33.33	0.00	33.33	66.67	0.01	0.01
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	351	70.34	72.34	36.47	35.90	27.07	37.04	0.08	0.12
39100 Pough-New-Middle MSA (Orange County) 2012-13	122	24.45	74.03	45.08	42.62	27.87	29.51	0.99	1.65
NYS Non MSA (Sullivan County 4 towns) 2012-13	10	2.00	73.94	30.00	50.00	30.00	20.00	1.01	1.80

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.94% of small loans to businesses originated and purchased by the bank.

* Based on 2012 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.21% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: 2011 SNB PE REPORTS			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share ¹	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
28740 Kingston NY MSA (Ulster County -4 towns) 2011	0	0.00	97.77	0.00	0.00	0.00	0.00	0.00	0.00
35644 New York-White Plains-Wayne NY-NJ MD 2011	0	0.00	96.37	0.00	0.00	0.00	0.00	0.00	0.00
39100 Pough-New-Middle MSA (Orange County) 2011	11	100.00	96.20	72.73	63.64	27.27	9.09	13.95	10.00
NYS Non MSA (Sullivan County -4 towns) 2011	0	0.00	97.18	0.00	0.00	0.00	0.00	8.33	0.00
Borrower Distribution: SMALL LOANS TO FARMS		Geography: 2012-13 SNB PE REPORT			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share ¹	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	0	0.00	98.85	0.00	0.00	0.00	0.00	0.00	0.00
35004 Nassau-Suffolk (Western) NY MD 2013	0	0.00	96.93	0.00	0.00	0.00	0.00	0.00	0.00
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	3	16.67	96.14	0.00	100.00	0.00	0.00	0.00	0.00
39100 Pough-New-Middle MSA (Orange County) 2012-13	15	83.33	97.04	53.33	60.00	33.33	6.67	12.00	14.29
NYS Non MSA (Sullivan County -4 towns) 2012-13	0	0.00	98.70	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 9.09% of small loans to farms originated and purchased by the bank.

* Based on 2012 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 5.56% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: 2011 SNB PE REPORTS				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
28740 Kingston NY MSA (Ulster County -4 towns) 2011	0	0	0	0	0	0	0.00	0	0
35644 New York-White Plains-Wayne NY-NJ MD 2011	0	0	1	250	1	250	100.00	0	0
39100 Pough-New-Middle MSA (Orange County) 2011	0	0	0	0	0	0	0.00	0	0
NYS Non MSA (Sullivan County -4 towns) 2011	0	0	0	0	0	0	0.00	0	0
QUALIFIED INVESTMENTS		Geography: 2012-13 SNB PE REPORT				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	0	0	0	0	0	0	0.00	0	0
35004 Nassau-Suffolk (Western) NY MD 2013	0	0	1	1,811	1	1,811	9.68	0	0
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	0	0	9	15,315	9	15,315	81.78	0	0
39100 Pough-New-Middle MSA (Orange County) 2012-13	0	0	1	1,600	1	1,600	8.54	0	0
NYS Non MSA (Sullivan County 4 towns) 2012-13	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.
 ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.
 * 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.
 ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: 2011 SNB PE REPORTS								Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits*	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
28740 Kingston NY MSA (Ulster County -4 towns) 2011	03.11	2	5.41	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	12.93	61.27	25.80
35644 New York-White Plains-Wayne NY-NJ MD 2011	67.60	19	51.35	0.00	5.26	21.05	73.68	2	0	0	0	0	2	1.37	4.40	18.67	75.56
39100 Pough-New-Middle MSA (Orange County) 2011	26.76	14	37.84	0.00	0.00	71.43	28.57	0	0	0	0	0	0	9.09	15.04	56.66	19.20
NYS Non MSA (Sullivan County-4 towns) 2011	02.53	2	5.41	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	6.51	65.81	27.67
DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: 2012-13 SNB PE REPORT								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
MA/Assessment Area:	Deposits*	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
28740 Kingston NY MSA (Ulster County -4 towns) 2012-13	02.02	2	03.03	0.00	100.00	0.00	0.00	1	1	0	0	2	0	0.00	16.54	65.10	18.35
35004 Nassau-Suffolk (Western) NY MD 2013	00.61	1	03.03	0.00	0.00	100.00	0.00	1	0	0	0	1	0	2.47	16.86	58.52	21.99
35644 New York-White Plains-Wayne NY-NJ MD 2012-13	74.20	18**	54.55	0.00	5.56	16.67	66.67	2	3	0	0	0	5	13.76	25.63	25.81	34.56
39100 Pough-New-Middle MSA (Orange County) 2012-13	21.52	11	33.33	0.00	0.00	81.81	18.20	1	3	0	0	2	2	9.05	14.87	50.67	25.41
NYS Non MSA (Sullivan County -4 towns) 2012-13	01.63	2	03.03	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	28.89	26.50	44.61

* FDIC Summary of Deposits based on 2000 Census Data
 * FDIC Summary of Deposits based on 2010 Census Data
 ** Unknown census tracts for two branches opened in 2013

