



## **PUBLIC DISCLOSURE**

October 23, 2017

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Savannah Bank National Association  
Charter Number 12810

1565 Main Street, P.O. Box 278  
Savannah, NY 13146

Office of the Comptroller of the Currency

5000 Brittonfield Parkway  
Suite 102B  
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**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## **Overall CRA Rating**

**INSTITUTION'S CRA RATING: This institution is rated Satisfactory.**

**The Lending Test is rated: Satisfactory.**

The primary factors supporting the CRA rating are as follows:

- The bank had a reasonable loan-to-deposit ratio during the evaluation period.
- A majority of home mortgage loans originated or purchased during the evaluation period were within the bank's assessment areas (AAs).
- The bank had a reasonable penetration of home mortgage loans to borrowers of different incomes within the AAs.
- The bank had an excellent dispersion of home mortgage loans among census tracts of different income designations within the AAs.

## Definitions and Common Abbreviations

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

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

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

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

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

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

## Description of Institution

Savannah Bank, National Association (SBNA) is a \$142.9 million community bank headquartered in Savannah, New York (NY). SBNA has four branch offices, a drive-through branch, and a main office. Savannah is in the Southeastern portion of Wayne County, which is part of the Rochester MSA 40380. In 2016, the main office was located in a moderate-income census tract (CT); however, in 2017, that CT's income level designation changed to middle-income. In the Non-MSA AA (CTs in Northern Cayuga County and Northern Seneca County), the bank has a branch in Auburn, Port Byron, Fair Haven, and Waterloo, NY. Since the last evaluation, the bank opened a drive-through location in Auburn, NY. The drive-through is located in the Non-MSA AA's low-income CT. The bank's president maintains his office in the Auburn branch, which is located in a local shopping mall. Each branch has an automated teller machine (ATM). Branch hours are generally from 8:30 AM to 4:00 PM, Monday through Wednesday, with an extra hour of banking to 5:00 PM on Thursday and Friday. The Auburn drive-through is open at 8:00 AM and extends its hours on Friday to 6:00 PM. The Fair Haven branch has hours from 10:00 AM to 3:00 PM, Monday through Wednesday, and from 10:00 AM to 5:00 PM, Thursday and Friday. The Auburn branch and drive-through have Saturday hours from 9:00 AM to 12:00 PM. For customers who like the option of electronic banking, the bank offers online banking to check account balances and transfer funds between accounts. The bank also offers an online bill payment feature.

As of June 30, 2017, SBNA had \$68.9 million in total loans consisting of 47.6 percent secured with residential real estate mortgages, 33.4 percent secured by commercial real estate, 15.3 percent commercial & industrial loans, 2.1 percent consumer loans, and 2.0 percent agricultural and other loans. Deposits are sourced substantially from the bank's market area. Management does not sell mortgages on the secondary market.

Based on our review of loan originations from January 1, 2015, to June 30, 2017, home mortgage loans reported on the bank's Home Mortgage Disclosure Act Loan Application Register (HMDA LAR) are the bank's primary product, as loans included in this category had the greatest number of originations based on number and dollar amount. The bank's management and branch staff directly source mortgage referrals through relationships with realtors serving the bank's lending area, customer referrals, and walk in business.

The bank offers other noncomplex retail loans, as well as, business loans. Deposit accounts offered by the bank include various types of savings and checking accounts.

SBNA has no legal, financial or other impediments hindering its ability to help meet the credit needs in its AAs. SBNA demonstrated Satisfactory performance at its last CRA evaluation dated March 28, 2011.

## Description of Assessment Areas

### Non-MSA AA

The AA consists of 20 CTs in Cayuga and Seneca Counties. The AA does not arbitrarily exclude low- or moderate-income CTs. The AA has one low-income CT (CT 421) in the Southwest section of the City of Auburn. A New York State prison is located in the low-income CT. As of 2017, there are two moderate-income CTs in Cayuga County. CTs 413 and 414 are on the north side of the City of Auburn and had been middle-income tracts in 2016. In 2017, there are 14 middle-income CTs and five upper-income CTs in the AA. There are no low- or moderate-income CTs in Seneca County. As of 2017, the AA has 77,878 persons and includes 35,475 total housing units. Approximately 86.4 percent of the housing units are occupied, with 57.2 percent of the total housing units owner-occupied and 29.3 percent rentals. Approximately 13.6 percent are vacant. The weighted average median housing value is \$103,351. The AA includes 30,663 households, of which 4,249, or 13.9 percent, are living below the poverty level. The AA has 18,605 total families, and a 2017 Updated Median Family Income (MFI) of \$62,500.

Competition for home mortgage loans in the AA is significant. In 2016, there were 110 HMDA reporting lenders who originated 1,435 HMDA reportable loans in the AA. SBNA ranked tenth with 2.86 percent of loans originated. The top five lenders, including The Lyons National Bank, Community Bank, NA, AmeriCu Credit Union, Wells Fargo, and Generations Bank, accounted for 26.6 percent of originations. Management reported that competition for loans in Seneca County is more intense than in Cayuga County.

In 2016, the bank had the fifth largest share of FDIC insured deposits in the AA at 7.2 percent. Key Bank maintained the largest share at 31.9 percent. In Seneca County, the bank's share of 2016 deposit accounts was fourth at 4.7 percent, but the next competitor, Lyons National Bank, held 11.7 percent of deposits and the top three deposit holders, Five Star Bank, Community Bank, NA, and Generations Bank, held a combined 75.4 percent of deposits.

The unemployment rates for Seneca and Cayuga Counties, as of June 30, 2017, were 4.2 percent and 4.6 percent, respectively. The unemployment rates for Seneca and Cayuga Counties were on par with the New York State rate of 4.5 percent for the same period.

Economic conditions in the AA are stable. Significant industries include agriculture, manufacturing, and tourism. In Cayuga County, major employers include: Auburn Community Hospital, New York State Department of Corrections (including prisons in Auburn and Moravia), and the Auburn School District. Private employers include Walmart, Wegmans, TRW Automotive, and Xylem (water technology). Major area employers in Seneca County include: Goulds Pumps, Waterloo Premium Outlets, ARG Trucking Corp., Seneca Cayuga ARC, and the New York Chiropractic College.

Between 2010 and 2016, Cayuga and Seneca Counties experienced population declines of 2.68 percent and 1.33 percent, respectively.

Demographic Information of the AA						
Assessment Area: 2017 Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	10.0	70.0	15.0	0.0
Population by Geography	77,878	5.5	10.9	66.3	17.3	0.0
Housing Units by Geography	35,475	4.1	12.2	65.1	18.6	0.0
Owner-Occupied Units by Geography	20,292	2.0	8.2	67.9	21.8	0.0
Occupied Rental Units by Geography	10,371	8.4	22.1	60.7	8.8	0.0
Vacant Units by Geography	4,812	3.5	8.2	62.7	25.6	0.0
Family Distribution by Income Level	18,605	18.8	17.6	22.4	41.2	0.0
Updated MFI Non-MSA AA		\$62,500	Median Housing Value			\$103,351
			Median Gross Rent			\$683
			Households Below the Poverty Level			13.86%
<i>Source: 2010 U.S. Census and 2017 D&amp;B Data, Updated 2017 Median Family Income</i>						

### Rochester NY MSA AA

The AA consists of four CTs in Wayne County. The AA does not arbitrarily exclude low- or moderate-income CTs. The AA has no low-income or upper-income CTs. As of 2017, there are three moderate-income CTs in the AA and one middle-income CT. CT 215.02 remains a moderate-income CT. However in 2017, CT 216, encompassing a larger rural area, and CT 218, encompassing the village of Clyde, NY, both formerly middle-income CTs in 2016, were designated moderate-income CTs. In 2017, CT 217 was reclassified as middle-income from moderate-income. As of 2017, the AA has 14,402 persons and includes 6,657 total housing units. Approximately 80.8 percent of the housing units are occupied, with 65.1 percent of the total housing units owner-occupied and 15.7 percent rentals. Approximately 19.2 percent are vacant. The weighted average median housing value is \$82,687. The AA includes 5,378 households, of which 623, or 11.60 percent, are living below the poverty level. The AA has 3,721 total families and a MFI of \$68,600.

Competition for home mortgage loans in the AA is significant. In 2016, there were 43 HMDA reporting lenders who originated 184 HMDA reportable loans in the AA. Again, SBNA ranked tenth in loan originations with 2.17 percent of originations. The top five lenders, Reliant Federal Credit Union, The Lyons National Bank, Quicken Loans, Wells Fargo, and Community Bank, NA, accounted for 60.3 percent of originations.

In 2016, the bank had the seventh largest share of Wayne County FDIC insured deposits at 3.1 percent. The Lyons National Bank had the largest share of deposits in the county at 53.4 percent, and Community Bank, NA, was next with 15.22 percent.

The unemployment rate in Wayne County was 4.4 percent, as of June 30, 2017. The New York State unemployment rate was 4.5 percent at the same date.

Economic conditions in the AA are stable. Industries providing the most employment are manufacturing, healthcare, education, and retail. In Wayne County, major employers include: Newark-Wayne Community Hospital, Wayne County government, and several school districts. Manufacturing firms in the county are diverse. Wegmans and Walmart account for a large portion of retail jobs. Between 2010 and 2016, the population of Wayne County declined 3.15 percent.

<b>Demographic Information of the AA</b>						
<b>Assessment Area: 2017 Rochester NY MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	75.0	25.0	0.0	0.0
Population by Geography	14,402	0.0	74.7	25.3	0.0	0.0
Housing Units by Geography	6,657	0.0	77.5	22.5	0.0	0.0
Owner-Occupied Units by Geography	4,335	0.0	72.4	27.6	0.0	0.0
Occupied Rental Units by Geography	1,043	0.0	84.3	15.7	0.0	0.0
Vacant Units by Geography	1,279	0.0	89.1	10.9	0.0	0.0
Family Distribution by Income Level	3,721	25.3	24.9	24.9	24.9	0.0
Updated MFI Rochester NY MSA AA		\$68,600	Median Housing Value			\$82,687
			Median Gross Rent			\$669
			Households Below the Poverty Level			11.58%

*Source: 2010 U.S. Census and 2017 D&B Data, Updated 2017 Median Family Income*

Community contact information regarding the bank's AA indicated that the credit needs within the AA include affordable home mortgage loans.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

Our evaluation covered the time period from March 28, 2011, to October 23, 2017. Our review of the bank's performance under the Lending Test was based on loan originations and purchases of the bank's primary loan product, home mortgage loans, between January 1, 2015, and June 30, 2017. Management strategies have not changed significantly and management agreed that the Lending Test period is representative of the entire evaluation period.

### **Data Integrity**

Our data integrity examination, completed in advance of this evaluation, reviewed data contained in the bank's HMDA LARs for 2015, 2016, and the first quarter of 2017. Based on this testing, we determined that HMDA data is accurate and management's systems and controls ensure reasonable accuracy.

### **Selection of Areas for Full-Scope Review**

We conducted a full-scope review of the Non-MSA AA and Rochester NY MSA AA. See the Table in Appendix A for more information.

### **Ratings**

The bank's overall rating is based primarily on the AAs that received full-scope reviews. We gave performance in the Non-MSA AA the most weight, as the AA accounts for 88 percent of the bank's loans and 79 percent of the bank's deposits. We placed lesser weight on the Rochester NY MSA AA, which originated 12 percent of the bank's loans and 21 percent of the bank's deposits.

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

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of

Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified this institution (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices.

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Loan-to-Deposit Ratio

SBNA's average loan-to-deposit ratio during the evaluation period was reasonable. The bank’s average quarterly loan-to-deposit ratio since the last CRA evaluation through June 30, 2017, was 51.90 percent. In comparison, three similarly situated banks, operating in similar markets or competing directly with SBNA, had average quarterly loan-to-deposit ratios ranging from 35.53 to 56.99 percent.

#### Lending in Assessment Area

A majority of the number of the bank’s loans originated or purchased during the evaluation period were within the AAs. Based on dollar amount, slightly less than a majority of originations were made within the AAs. During 2015, the bank granted some larger dollar amount loans outside of the AA, impacting the overall results. Results improved in both 2016 and 2017 to date, where lending within the AAs, based on dollar amount, was approximately 50 percent.

Lending in SBNA’s AAs										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage Loans	122	58.7	86	41.3	208	\$7,229	41.0	\$10,402	59.0	\$17,631
Totals	122	58.7	86	41.3	208	\$7,229	41.0	\$10,402	59.0	\$17,631

Source: 2015, 2016, and 2017 HMDA LAR data

**Lending to Borrowers of Different Incomes**

SBNA’s distribution of loans to borrowers of different incomes reflects reasonable distribution in the AAs.

SBNA shows excellent penetration in originating or purchasing home mortgage loans to moderate-income individuals in the Non-MSA AA. SBNA shows reasonable penetration to low-income borrowers in the AA, as the level of poverty and average price for a home make originating viable loans to low-income families more difficult in the Non-MSA AA.

<b>Borrower Distribution of Home Mortgage Loans Non-MSA AA January 1, 2015 to June 30, 2017</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Mortgage Loans	18.8%	11.2%	17.6%	17.8%	22.4%	23.4%	41.3%	34.5%

Source: 2015, 2016, and January 1, 2017 to June 30, 2017 HMDA LAR Data; 2010 U.S. Census data (updated 2017). 13.1 percent of loans in the AA had no income reported.

SBNA shows excellent penetration in originating or purchasing home mortgage loans to moderate-income individuals in the Rochester NY MSA AA. SBNA shows poor penetration to low-income borrowers.

<b>Borrower Distribution of Home Mortgage Loans Rochester NY MSA AA January 1, 2015 to June 30, 2017</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Mortgage Loans	25.3%	6.7%	24.9%	40.0%	24.9%	26.7%	24.9%	26.7%

Source: 2015, 2016 and January 1, 2017 to June 30, 2017 HMDA LAR Data; 2010 U.S. Census data (updated 2017).

**Geographic Distribution of Loans**

The bank had overall excellent dispersion of home mortgage loans among CTs of different income designations within the AAs.

SBNA had an excellent distribution of loans to the low-income CTs in the Non-MSA AA, for the 2015-2016 time period, and the 2017 time period. Refer to the following tables for additional information.

<b>Geographic Distribution of Home Mortgage Loans Non-MSA AA 2015 and 2016</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans						
Home Mortgage Loans	2.3%	4.8%	0.0%	0.0%	82.2%	85.4%	15.5%	9.8%

Source: 2015 and 2016 HMDA LAR Data; 2010 U.S. Census data

<b>Geographic Distribution of Home Mortgage Loans Non-MSA AA January 1, 2017 to June 30, 2017</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans						
Home Mortgage Loans	2.1%	4.0%	8.2%	16.0%	67.9%	68.0%	21.8%	12.0%

Source: 2017 HMDA LAR Data; 2010 U.S. Census data (updated 2017).

SBNA had an excellent distribution of loans to the moderate-income CTs in the Rochester NY MSA AA in the 2015-2016 time period and reasonable distribution in the 2017 time period. Refer to the following tables for additional information.

<b>Geographic Distribution of Home Mortgage Loans Rochester NY MSA AA 2015 and 2016</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans						
Home Mortgage Loans	0.0%	0.0%	58.5%	80.0%	41.5%	20.0%	0.0%	0.0%

Source: 2015 and 2016 HMDA LAR Data; 2010 U.S. Census data

<b>Geographic Distribution of Home Mortgage Loans                      Rochester NY MSA AA                      January 1, 2017 to June 30, 2017</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans						
Home Mortgage Loans	0.0%	0.0%	72.4%	60.0%	27.6%	40%	0.0%	0.0%

Source: 2017 HMDA LAR Data; 2010 U.S. Census data (updated 2017).

### Response to Complaints

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

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (01/01/15 to 06/30/17)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
(Savannah Bank, National Association (SBNA) Savannah, New York)		
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	None	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Non-MSA New York State Rochester NY MSA	Full Scope Full Scope	