



PUBLIC DISCLOSURE

August 7, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Dream First Bank, National Association
Charter Number 8114

11 North Main Street
Syracuse, KS 67878

Office of the Comptroller of the Currency

2959 North Rock Road, Suite 510
Wichita, KS 67226

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on Satisfactory performance in the State of Kansas.
- The Community Development (CD) Test rating is based on Satisfactory performance in the State of Kansas.
- A more than reasonable loan-to-deposit (LTD) ratio.
- A majority of the bank's loans were made in its assessment area (AA).

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is more than reasonable.

Dream First Bank's (DFB or the bank) average quarterly loan-to-deposit (LTD) ratio since the last CRA examination is 82.5 percent, and ranged from 74.8 percent to 88.9 percent. The average quarterly LTD ratio is calculated on a bank-wide basis. There are seven banks in the AA that are considered to be primary competitors to Dream First Bank. The average LTD ratio of the peer banks was 65.2 percent and ranged from 34.5 percent to 92.7 percent.

Lending in Assessment Area

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

From a random sample of loans, the bank originated and purchased 87.5 percent of loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Both primary products of the bank, commercial and consumer loans, had a substantial majority of originations within the AA based on number and dollar amount of originations. Dream First Bank has a healthy market share in southwestern Kansas and actively seeks opportunities within the AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	18	90.0	2	10.0	20	9,855	99.6	37	0.4	9,892
Consumer	17	85.0	3	15.0	20	1,565	75.5	507	24.5	2,072
Total	35	87.5	5	12.5	40	11,420	95.5	544	4.5	11,964

Description of Institution

Dream First Bank (DFB) is a \$511 million institution as of June 30, 2023, with the main office headquartered in Syracuse, KS. DFB is a single-state institution wholly owned by Legacy Financial, Inc., a one-bank holding company located in Johnson, KS. The bank has no affiliates and no subsidiary activities for consideration in this evaluation.

In addition to the main office, DFB operates five full-service branches: one in Johnson, KS, approximately 30 miles south; one in Ulysses, KS, approximately 50 miles southeast; one in Hugoton, KS, approximately 80 miles southeast; and two in Garden City, KS, approximately 50 miles east. All five branches include 24-hour ATMs that are deposit-taking and cash-dispensing. There is an additional cash-dispensing ATM located on the Garden City Community College campus, as well as at the Tyson plant in Holcomb, KS. DFB recently acquired a portion of the assets and all branches resulting from the closure of Heartland Tri-State Bank in Elkhart, KS on July 28, 2023. The acquisition has no impact on this evaluation.

DFB offers a variety of loan products. As of June 30, 2023, net loans total \$390.8 million and represent 76 percent of total assets. The loan portfolio had the following composition: real estate loans, 57.4 percent; commercial loans, 23.3 percent; individual loans, 2.0 percent; agricultural loans, 16.0 percent; all other loans and leases, 1.1 percent. DFB's tier 1 capital totaled \$52.4 million as of June 30, 2023.

The primary lending products of the bank are commercial loans by dollar amount originated and consumer loans by total number of originations. DFB has identified one AA, which consists of Finney County, Grant County, Hamilton County, and Stanton County, in Kansas. The last CRA examination was performed on July 13, 2020, and the bank was rated as Satisfactory in the overall rating, lending test, and community development test. The bank is not subject to any pending litigation or other factors impeding the bank's ability to meet the credit needs in the AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for both the Lending Test and the Community Development Test ranges from January 1, 2020, through December 31, 2021. While the normal evaluation period would include three full calendar years, the 2022 peer aggregate data was not available at the time of review; therefore, only two full calendar years were included during this review. The next CRA examination will be expanded to include a four-year evaluation period. The bank was evaluated under the Intermediate Small Bank (ISB) procedures.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details

regarding how full-scope AAs were selected. Refer to Appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

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

The OCC placed more weight on the commercial lending and consumer lending portfolios as these are the bank's primary products.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (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 that require consideration in this evaluation.

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

State Rating

State of Kansas

CRA rating for the State of Kansas¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- A more-than reasonable LTD ratio. DFB's average quarterly LTD ratio is 82.5 percent compared to 65.2 percent of peer banks situated in the AA.
- A substantial majority of the bank's loans are inside its AA. From a random sample of loans, the bank originated and purchased 87.5 percent of loans inside the AA.
- A reasonable geographic distribution of loans in the AA. DFB demonstrated satisfactory distribution of small business and consumer loans to borrowers in moderate-income tracts.
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes. DFB demonstrated strong distribution of consumer loans and satisfactory distribution of small business loans.
- Adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services.

Description of Institution's Operations in Kansas

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

DFB faces significant competition for financial services in the AA from seven banks. The asset sizes for these institutions range from approximately \$103.8 million to \$31.7 billion. As of June 30, 2021, the AA had 10 FDIC-Insured financial institutions, which included branches of national and regional banks, and local community banks. DFB ranked first in deposits with a market share of 26.40 percent. Ranking second and third in deposits were Grant County Bank and Commerce Bank, having 15.81 percent and 15.79 percent of the market share, respectively.

The OCC contacted a member of the community to assess the credit needs of the community and opportunities for financial institutions in the Syracuse AA. This community contact works for an economic development organization whose main purpose is to grow economy through business and industrial recruitment, add housing as needed, facilitate quality of life projects, and promote work force development. The contact identified DFB as one of three main financial institutions who go above and beyond to serve the local community both for consumers and businesses. The contact stated that DFB excels in helping entrepreneurial ventures and start-ups. Comments about DFB were not solicited, but given in candid conversation during the interaction.

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

Syracuse AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	25.0	56.3	18.8	0.0
Population by Geography	49,684	0.0	16.2	68.7	15.1	0.0
Housing Units by Geography	18,433	0.0	14.1	71.0	14.9	0.0
Owner-Occupied Units by Geography	11,291	0.0	12.2	69.4	18.4	0.0
Occupied Rental Units by Geography	5,834	0.0	19.1	72.1	8.8	0.0
Vacant Units by Geography	1,308	0.0	8.0	80.4	11.6	0.0
Businesses by Geography	3,128	0.0	19.2	67.7	13.1	0.0
Farms by Geography	465	0.0	3.4	69.9	26.7	0.0
Family Distribution by Income Level	12,525	18.2	19.7	21.3	40.7	0.0
Household Distribution by Income Level	17,125	15.8	17.4	21.1	45.7	0.0
Median Family Income Non-MSAs - KS		\$57,229	Median Housing Value			\$110,172
			Median Gross Rent			\$663
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Kansas

The bank has only one AA in Kansas; therefore, we performed a full-scope review of that AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

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

DFB exhibited reasonable distribution of small business loans to borrowers located in moderate-income tracts. Our sample found 20.0 percent of the small business loans were originated in moderate-income tracts. Additionally, only 19.2 percent of the small businesses located in the AA were located in moderate-income tracts, with aggregate lending being 17.0 percent. The AA did not include any low-income tracts, but the bank's small business lending is concentrated in the moderate-income tracts and middle-income tracts, having 20.0 percent and 65.0 percent, respectively, of the loans originated.

Consumer Loans

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

DFB demonstrated more than reasonable distribution of consumer loans to borrowers located in moderate-income tracts. Our sample found that 25.0 percent of the consumer loans were originated in moderate-income tracts. Additionally, only 14.5 percent of the households located in the AA were located in moderate-income tracts. The AA did not include any low-income tracts, but the percent of consumer lending is concentrated in moderate-income tracts and middle-income tracts, having 30.0 percent and 55.0 percent, respectively, of the loans originated.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

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

DFB exhibited reasonable distribution with 75.0 percent of our sampled loans originated to small business borrowers with revenues less than or equal to \$1 million. This compares to 74.5 percent of businesses in the AA representing that category, and the aggregate lending being only 45.8 percent.

Consumer Loans

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

DFB exhibited more than reasonable distribution of consumer loans to low- and moderate-income borrowers. From our sample, the bank originated 30.0 percent of consumer loans to borrowers in low-income tracts, and 5.0 percent of loans to borrowers in moderate-income tracts. This is compared to 15.8 percent of households being in low-income tracts and 17.4 percent of households in moderate-income tracts.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area(s).

Number and Amount of Community Development Loans

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

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Syracuse AA	237	78.2	14,178	87.5

CD loans demonstrated excellent responsiveness to CD needs and opportunities during the evaluation period. Management originated 237 CD loans totaling more than \$14.2 million or 31.7 percent of tier one capital within the AA. All but one of the CD loans provide support as disaster recovery through revitalization/stabilization. These loans were made under the Paycheck Protection Program through SBA during the COVID-19 pandemic. These loans helped retain jobs for individuals during a major disaster and were part of a disaster recovery plan from the Federal Government that the bank participated in. One loan was for economic development and retained two jobs for LMI individuals.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Syracuse AA	0	0	2	4	2	100.0	4	100.0	0	0

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

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

The institution's performance under the Investment Test in the Syracuse AA is rated poor. During the evaluation period, investments totaled \$4,000 and represent less than one percent of the tier one capital.

Management provided no portfolio investments during the evaluation period. The bank made two qualified donations totaling \$4,000 in the AA during the evaluation period to two organizations. Donations supported organizations who provide community services such as programs for scholarships, and youth financial education programs targeted to LMI.

Extent to Which the Bank Provides Community Development Services

DFB provides an adequate level of CD services within the Syracuse AA. The bank had five different employees provide 379 hours of CD services to six different organizations. The bank also offers a small dollar loan program used to help individuals establish credit. This program has a low interest rate and small loan amounts that help LMI individuals with establishing credit. Examples of service hours include the following:

- Providing Federal Home Loan Bank (FHLB) funding to clients in need of Affordable Housing Program (AHP) grants for down payment assistance and closing cost needs for low- and moderate-income individuals.
- Serving on the board of an organization that treats youth who are victims of sexual and physical abuse.
- Serving on the board of an organization that collects and disburses donated funds primarily to organizations that provide community services to low- and moderate-income individuals.

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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2020 to 12/31/2021	
Bank Products Reviewed:	Small Business and Consumer Loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination:		
Rating and Assessment Areas	Type of Exam	Other Information
Kansas		
Syracuse AA	Full-Scope	Finney, Grant, Hamilton, and Stanton Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS Dream First Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Dream First Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Kansas	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Syracuse AA	20	9,956	100.0	559	0.0	0.0	0.0	19.2	20.0	17.0	67.7	65.0	67.3	13.1	15.0	15.7	0.0	0.0	0.0		
Total	20	9,956	100.0	559	0.0	0.0	0.0	19.2	20.0	17.0	67.7	65.0	67.3	13.1	15.0	15.7	0.0	0.0	0.0		

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Syracuse AA	20	9,956	100.0	559	74.5	75.0	45.8	6.3	25.0	19.2	0.0		
Total	20	9,956	100.0	559	74.5	75.0	45.8	6.3	25.0	19.2	0.0		

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2020-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$(000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Syracuse AA	20	1,860	100.0	0.0	0.0	14.5	30.0	70.3	55.0	15.2	15.0	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2020-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$(000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Syracuse AA	20	1,860	100.0	15.8	30.0	17.4	5.0	21.1	30.0	45.7	35.0	0.0	0.0	
Total	20	1,860	100.0	15.8	30.0	17.4	5.0	21.1	30.0	45.7	35.0	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.