PUBLIC DISCLOSURE

September 8, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Manufacturers and Traders Trust Company
RSSD No. 501105

One M&T Plaza
Buffalo, New York 14203

Federal Reserve Bank of New York
33 Liberty Street
New York, New York 10045

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.

TABLE OF CONTENTS

I. Institution Rating
- A. Overall Institution Rating 1
- B. Performance Test Ratings Table 1
- C. Summary of Major Factors Supporting Rating 1

II. Institution
- A. Description of Institution 3
- B. Scope of Examination 8
- C. Conclusions with Respect to Performance Tests 13

III. Multistate Metropolitan Areas
- A. MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)
  - 1. Multistate Metropolitan Area Rating (Full Scope Review) 22
  - 2. Scope of Examination 23
  - 3. Description of Institution's Operations 23
  - 4. Conclusions with Respect to Performance Tests 27
- B. MSA 19060 (Cumberland, MD-WV)
  - 1. Multistate Metropolitan Area Rating (Full Scope Review) 37
  - 2. Scope of Examination 38
  - 3. Description of Institution's Operations 38
  - 4. Conclusions with Respect to Performance Tests 42
- C. MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)
  - 1. Multistate Metropolitan Area Rating (Full Scope Review) 51
  - 2. Scope of Examination 52
  - 3. Description of Institution's Operations 52
  - 4. Conclusions with Respect to Performance Tests 57
- D. MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)
  - 1. Multistate Metropolitan Area Rating (Full Scope Review) 68
  - 2. Scope of Examination 69
  - 3. Description of Institution's Operations 69
  - 4. Conclusions with Respect to Performance Tests 73

E. MSA 41540 (Salisbury, MD-DE)
1. Multistate Metropolitan Area Rating (Full Scope Review) 84
2. Scope of Examination 85
3. Description of Institution's Operations 85
4. Conclusions with Respect to Performance Tests 88

F. MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD- WV)
1. Multistate Metropolitan Area Rating (Full Scope Review) 98
2. Scope of Examination 99
3. Description of Institution's Operations 99
4. Conclusions with Respect to Performance Tests 104

IV. Connecticut
A. Summary
1. State Rating 114
2. Scope of Examination 115
3. Description of Institution's Operations 115
4. Conclusions with Respect to Performance Tests 115

B. MSA 14860 (Bridgeport-Stamford-Norwalk, CT) (Full Scope Review)
i. Description of Institution's Operations 116
ii. Conclusions with Respect to Performance Tests 119

V. Delaware
A. Summary
1. State Rating 129
2. Scope of Examination 130
3. Description of Institution's Operations 130
4. Conclusions with Respect to Performance Tests 130

B. MSA 20100 (Dover, DE) (Full Scope Review)
i. Description of Institution's Operations 131
ii. Conclusions with Respect to Performance Tests 134

VI. Florida
A. Summary
1. State Rating 144
2. Scope of Examination 145
3. Description of Institution's Operations 145
4. Conclusions with Respect to Performance Tests 145

B. MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) (Full Scope Review)
i. Description of Institution's Operations 149
ii. Conclusions with Respect to Performance Tests 152

C. MD 38940 (Port St. Lucie, FL) (Limited Scope Review)
i. Description of Institution's Operations 161
ii. Conclusions with Respect to Performance Tests 161

D. MD 42640 (Sebastian-Vero Beach, FL) (Limited Scope Review)
i. Description of Institution's Operations 161
ii. Conclusions with Respect to Performance Tests 161

VII. Maryland
A. Summary
1. State Rating 165
2. Scope of Examination 166
3. Description of Institution's Operations 166
4. Conclusions with Respect to Performance Tests 167

B. MSA 12580 (Baltimore-Columbia-Towson, MD) (Full Scope Review)
i. Description of Institution's Operations 170
ii. Conclusions with Respect to Performance Tests 174

C. MSA 15680 (California-Lexington, MD) (Limited Scope Review)
i. Description of Institution's Operations 185
ii. Conclusions with Respect to Performance Tests 186

D. MSA 25180 (Hagerstown-Martinsburg, MD) (Limited Scope Review)
i. Description of Institution's Operations 187

ii. Conclusions with Respect to Performance Tests 187

E. Nonmetropolitan Statewide Review Group A (Limited Scope Review)
i. Description of Institution's Operations 189
ii. Conclusions with Respect to Performance Tests 189

F. Nonmetropolitan Statewide Review Group B (Limited Scope Review)
i. Description of Institution's Operations 191
ii. Conclusions with Respect to Performance Tests 191

VIII. Massachusetts
A. Summary
1. State Rating 193
2. Scope of Examination 194
3. Description of Institution's Operations 194
4. Conclusions with Respect to Performance Tests 194

B. MD 14454 (Boston, MA) (Full Scope Review)
i. Description of Institution's Operations 195
ii. Conclusions with Respect to Performance Tests 198

IX. New Jersey
A. Summary
1. State Rating 207
2. Scope of Examination 208
3. Description of Institution's Operations 208
4. Conclusions with Respect to Performance Tests 208

B. MD 14454 (Trenton, NJ) (Full Scope Review)
i. Description of Institution's Operations 212
ii. Conclusions with Respect to Performance Tests 215

C. MD 14454 (Atlantic City-Hammonton, NJ) (Limited Scope Review)
i. Description of Institution's Operations 223
ii. Conclusions with Respect to Performance Tests 223

X. New York
A. Summary
1. State Rating 225
2. Scope of Examination 226
3. Description of Institution's Operations 227
4. Conclusions with Respect to Performance Tests 227

B. MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) (Full Scope Review)
i. Description of Institution's Operations 231
ii. Conclusions with Respect to Performance Tests 235

C. MSA 40380 (Rochester, NY) (Full Scope Review)
i. Description of Institution's Operations 245
ii. Conclusions with Respect to Performance Tests 249

D. MSA 45060 (Syracuse, NY) (Full Scope Review)
i. Description of Institution's Operations 259
ii. Conclusions with Respect to Performance Tests 262

E. MSA 10580 (Albany-Schenectady-Troy, NY) (Full Scope Review)
i. Description of Institution's Operations 273
ii. Conclusions with Respect to Performance Tests 277

F. MSA 13780 (Binghamton, NY) (Limited Scope Review)
i. Description of Institution's Operations 287
ii. Conclusions with Respect to Performance Tests 287

G. MSA 21300 (Elmira, NY) (Limited Scope Review)
i. Description of Institution's Operations 289
ii. Conclusions with Respect to Performance Tests 289

H. MSA 27060 (Ithaca, NY) (Limited Scope Review)
i. Description of Institution's Operations 291
ii. Conclusions with Respect to Performance Tests 291

I. MSA 28740 (Kingston, NY) (Limited Scope Review)
i. Description of Institution's Operations 293
ii. Conclusions with Respect to Performance Tests 293

J. MSA 46540 (Utica-Rome, NY) (Limited Scope Review)
i. Description of Institution's Operations 295
ii. Conclusions with Respect to Performance Tests 295

K. MSA 48060 (Watertown-Fort Drum, NY) (Limited Scope Review)
i. Description of Institution's Operations 297
ii. Conclusions with Respect to Performance Tests 297

L. Nonmetropolitan Statewide Review Group A (Limited Scope Review)
i. Description of Institution's Operations 299
ii. Conclusions with Respect to Performance Tests 300

M. Nonmetropolitan Statewide Review Group B (Limited Scope Review)
i. Description of Institution's Operations 301
ii. Conclusions with Respect to Performance Tests 302

N. Nonmetropolitan Statewide Review Group C (Limited Scope Review)
i. Description of Institution's Operations 303
ii. Conclusions with Respect to Performance Tests 303

XI. Pennsylvania
A. Summary
1. State Rating 305
2. Scope of Examination 306
3. Description of Institution's Operations 307
4. Conclusions with Respect to Performance Tests 307

B. MSA 49620 (York-Hanover, PA (Full Scope Review)
i. Description of Institution's Operations 310
ii. Conclusions with Respect to Performance Tests 313

C. MSA 25420 (Harrisburg-Carlisle, PA) (Full Scope Review)

i. Description of Institution's Operations 323
ii. Conclusions with Respect to Performance Tests 326

D. MSA 42540 (Scranton-Wilkes-Barre-Hazelton, PA) (Full Scope Review)
i. Description of Institution's Operations 336
ii. Conclusions with Respect to Performance Tests 339

E. MSA 11020 (Altoona, PA) (Full Scope Review)
i. Description of Institution's Operations 349
ii. Conclusions with Respect to Performance Tests 352

F. MSA 39740 (Reading, PA) (Full Scope Review)
i. Description of Institution's Operations 361
ii. Conclusions with Respect to Performance Tests 364

G. MSA 14100 (Bloomsburg-Berwick, PA) (Limited Scope Review)
i. Description of Institution's Operations 374
ii. Conclusions with Respect to Performance Tests 374

H. MSA 16540 (Chambersburg-Waynesboro, PA) (Limited Scope Review)
i. Description of Institution's Operations 376
ii. Conclusions with Respect to Performance Tests 376

I. MSA 20700 (East Stroudsburg PA) (Limited Scope Review)
i. Description of Institution's Operations 378
ii. Conclusions with Respect to Performance Tests 378

J. MSA 23900 (Gettysburg, PA) (Limited Scope Review)
i. Description of Institution's Operations 380
ii. Conclusions with Respect to Performance Tests 380

K. MSA 29540 (Lancaster, PA) (Limited Scope Review)
i. Description of Institution's Operations 382
ii. Conclusions with Respect to Performance Tests 382

L. MSA 30140 (Lebanon, PA) (Limited Scope Review)

i. Description of Institution's Operations 384
ii. Conclusions with Respect to Performance Tests 384

M. MSA 44300 (State College, PA) (Limited Scope Review)
i. Description of Institution's Operations 386
ii. Conclusions with Respect to Performance Tests 386

N. MSA 48700 (Williamsport, PA) (Limited Scope Review)
i. Description of Institution's Operations 388
ii. Conclusions with Respect to Performance Tests 388

O. Nonmetropolitan Statewide Review Group A (Limited Scope Review)
i. Description of Institution's Operations 390
ii. Conclusions with Respect to Performance Tests 391

P. Nonmetropolitan Statewide Review Group B (Limited Scope Review)
i. Description of Institution's Operations 392
ii. Conclusions with Respect to Performance Tests 393

Q. Nonmetropolitan Statewide Review Group C (Limited Scope Review)
i. Description of Institution's Operations 394
ii. Conclusions with Respect to Performance Tests 395

R. Nonmetropolitan Statewide Review Group C (Limited Scope Review)
i. Description of Institution's Operations 396
ii. Conclusions with Respect to Performance Tests 397

XII. Virginia
A. Summary
1. State Rating 398
2. Scope of Examination 399
3. Description of Institution's Operations 399
4. Conclusions with Respect to Performance Tests 399

B. MSA 40060 (Richmond, VA) (Full Scope Review)
i. Description of Institution's Operations 400

ii. Conclusions with Respect to Performance Tests 403

XIII. Appendix

A. Scope of Examination 412

B. Summary of State and Multistate Metropolitan Area Ratings 415

C. Glossary 416

D. Aggregate Loan Distribution Tables 420

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: OUTSTANDING

The following table indicates the performance level of Manufacturers and Traders Trust Company with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	MANUFACTURERS AND TRADERS TRUST COMPANY		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

The major factors supporting the institution's rating include:

Lending Test:

- Lending levels reflected good responsiveness to the assessment areas credit needs;
- A high percentage of loans were made in the bank's assessment areas;
- The geographic distribution of loans reflected good penetration throughout the assessment areas;
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes;
- Exhibited a good record of serving the credit needs of low-income individuals and areas, and very small businesses.
- A leader in making community development loans.

- Made use of innovative and/or flexible lending products in serving assessment area credit needs.

Investment Test:

- Provided an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, often in a leadership position.
- Made significant use of innovative and/or complex investments to support community development initiatives.
- Exhibited excellent responsiveness to credit and community development needs.

Service Test:

- Delivery systems were readily accessible to the bank's geographies and individuals of different income levels in its assessment areas.
- Record of opening and closing branches did not adversely impacted the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced the needs its assessment area, particularly LMI geographies and/or LMI individuals.
- A leader in providing community development services.

INSTITUTION

DESCRIPTION OF INSTITUION

Total Assets	**$142.2 billion**
Net Loans & Leases	**$98.4 billion**
Total Domestic Deposits	**$121.1 billion**
Number of Branches	**750**
Headquarters	**Buffalo, NY**
Bank Holding Company	**M&T Bank Corporation**

Data as of December 31, 2020

Manufacturers and Traders Trust Company ("M&T" or "the bank") is the principal subsidiary of M&T Bank Corporation, a New York State-based bank holding company. Headquartered in Buffalo, New York, M&T is a full-service commercial bank with offices in New York, Maryland, Pennsylvania, Washington DC, Virginia, West Virginia, Delaware, Florida, Massachusetts, and Connecticut. The table above details information regarding the bank.

The bank and its affiliates provide a broad range of financial, commercial, and retail services to individuals, corporations, professional clients, government entities, and financial institutions. Bank services include loans, deposits, trust, mortgage banking, asset management, and other financial services.

M&T affiliates relevant to this evaluation include M&T Realty Capital Corporation and M&T Real Estate Trust. Both entities are wholly-owned subsidiaries of the bank with the principal business of originating and selling commercial development, and construction loans.

As of December 31, 2020, M&T's loans consisted of $10.0 billion in construction and land development, $25.2 billion in residential real estate, $22.4 billion in commercial, $22.8 billion in other real estate, and $12.6 billion consumer. The remainder is a mix of agricultural loans, lease financing, loans to institutions, and loans to state and political subdivisions, which are not material to the bank's lending operations. M&T provides consumers and small businesses a variety of traditional lending and deposit products and services through several delivery channels including traditional banking offices, ATMs, telephone banking and internet banking. Consumer loan products include indirect and direct residential mortgage, home equity loans and lines, indirect and direct automobile, credit cards, personal loans, student loans, overdraft lines of credit and credit card debt cancellation products. M&T also offers construction lending and commercial loan products, including loans and lines of credit, business credit cards, and Small Business Administration (SBA) loans.

M&T is an active SBA lender. According to the SBA, M&T ranked as the 30th highest SBA lender nationwide by dollar volume for its 7(a) loan program through the end of 2020. The 7(a) loan program is the SBA's most common loan program, offering funds to small businesses with flexible repayment terms for multiple purposes.

Loan Type	Loan Portfolio Composition					
	12/31/2020		12/31/2019		12/31/2018	
	$(000s)	Percent	$(000s)	Percent	$(000s)	Percent
Construction and Development	10,029,758	10.2	8,978,082	9.9	8,794,661	9.7
Residential Real Estate	25,172,746	25.6	24,644,841	27.1	25,581,597	28.2
Other Real Estate	22,837,092	23.2	22,245,275	24.5	21,683,229	23.9
Commercial and Industrial	22,431,380	22.8	22,431,380	24.7	18,208,703	20.1
Loans to Individuals	12,583,272	12.8	10,901,520	12.0	9,105,331	10.0
All Other Loans	5,379,364	5.5	1,591,047	1.8	7,418,624	8.2
Total	**98,433,612**	**100.0**	**90,792,145**	**100.0**	**90,792,145**	**100.0**

Since the previous CRA evaluation of M&T, the bank has expanded its presence to include the State of New Jersey through the acquisition of Hudson City Bank in November 2015.

As of December 31, 2018, M&T operated in nine states and six multistate metropolitan statistical areas ("MSA") that are subject to CRA evaluation ratings. The bank's geographic footprint consisted of 50 assessment areas as described below and included in Appendix A:

Multistate MSAs

- MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), consisting of
  - Metropolitan Division ("MD") 37964 (Philadelphia, PA), including Delaware and Philadelphia Counties.
  - MD 33874 (Montgomery County-Bucks County-Chester County, PA) consisting of Montgomery County, Bucks County, and Chester County, PA.
  - MD 15804, (Camden, NJ), consisting of Burlington, Camden, and Gloucester Counties, NJ
  - MD 48864 (Wilmington, DE-MD-NJ), consisting of Cecil County, MD and New Castle County, DE.
- MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA), consisting of:
  - MD 20524 (Dutchess County-Putnam County, NY), consisting of Dutchess and Putnam Counties.

- MD 35004 (Nassau County-Suffolk County, NY), consisting of Nassau and Suffolk Counties.
- MD 35084 (Newark, NJ-PA), consisting of Essex, Hunterdon, Morris, Somerset, and Union Counties, NJ.
- MD 35614 (New York-Jersey City-White Plains, NY-NJ), consisting of Bronx, Kings, New York, Orange, Queens, Richmond, Rockland, and Westchester Counties, NY, Bergen, Hudson, Middlesex, Monmouth, Ocean, Passaic Counties, NJ.

- MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), consisting of:

  - MD 43524 (Silver Spring-Frederick-Rockville, MD), consisting of Frederick and Montgomery Counties.

  - MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV), consisting of the District of Columbia, ("DC"); Calvert, Charles, and Prince George's Counties in MD; Arlington, Fairfax, Loudon, Prince William, Spotsylvania, Alexandria City, Fairfax City, Falls Church City, Fredericksburg City, Manassas City, and Manassas Park City Counties, VA.

- MSA 41540 (Salisbury, MD-DE), consisting of Sussex County DE, Somerset County, MD, Wicomico County, MD, Worcester County, MD.

- MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) consisting of Carbon, Lehigh, and Northampton Counties in PA, Warren County, NJ.

- MSA 19060 (Cumberland, MD-WV), consisting of Allegany County, MD and Mineral County, WV.

State of Connecticut

- MSA 14860 (Bridgeport-Stamford-Norwalk, CT), consisting of Fairfield County, CT.

State of Delaware

- MSA 20100 (Dover, DE), consisting of Kent County, DE.

State of Florida

- MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL), consisting of Palm Beach County, FL.
- MSA 38940 (Port St. Lucie, FL), consisting of Martin County, FL.
- MSA 42640 (Sebastian-Vero Beach, FL), consisting of Indian River County, FL.

State of Maryland

- MSA 12580 (Baltimore-Columbia-Towson, MD), consisting of Anne Arundel, Baltimore, Carroll, Harford, Howard, Queen Anne's, and Baltimore City, MD.
- MSA 15680 (California-Lexington, MD), consisting of St Mary's County, MD.
- MSA 25180 (Hagerstown-Martinsburg, MD-WV), consisting of Washington County, MD, MD.
- MD Nonmetropolitan area Group A, consisting of Caroline, Dorchester, and Talbot Counties, MD.
- MD Nonmetropolitan area Group B, consisting of Garrett County, MD.

State of Massachusetts

- MD 14454 (Boston, MA), consisting of Norfolk and Suffolk Counties, MA.

State of New Jersey

- MSA 45940 (Trenton, NJ), consisting of Mercer County, NJ.
- MSA 12100 (Atlantic City- Hammonton, NJ), consisting of Atlantic County, NJ.

State of New York

- MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY), consisting of Erie and Niagara Counties, NY.
- MSA 40380 (Rochester, NY), consisting of Livingston, Monroe, Ontario, Orleans, and Wayne Counties, NY.
- MSA 45060 (Syracuse, NY), consisting of Madison and Onondaga Counties, NY.
- MSA 10580 (Albany-Schenectady-Troy, NY), consisting of Albany, Rensselaer, Saratoga, and Schenectady Counties, NY.

- MSA 13780 (Binghamton, NY), consisting of Broome and Tioga Counties, NY.
- MSA 21300 (Elmira, NY), consisting of Chemung County, NY.
- MSA 27060 (Ithaca, NY), consisting of Tompkins County, NY.
- MSA 28740 (Kingston, NY), consisting of Ulster County, NY.
- MSA 46540 (Utica-Rome, NY), consisting of Herkimer and Oneida Counties, NY.
- MSA 48060 (Watertown-Fort Drum, NY), consisting of Jefferson County, NY.
- NY Nonmetropolitan area Group A, consisting of Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties, NY.
- NY Nonmetropolitan area Group B, consisting of Cayuga, Chenango, Cortland, and Seneca Counties, NY.
- NY Nonmetropolitan area Group C, consisting of Sullivan County, NY.

State of Pennsylvania

- MSA 49620 (York-Hanover, PA), consisting of York County, PA.
- MSA 25420 (Harrisburg-Carlisle, PA), consisting of Cumberland and Dauphin Counties, PA.
- MSA 42540 (Scranton-Wilkes-Barre-Hazelton, PA), consisting of Lackawanna, Luzerne, and Wyoming Counties, PA.
- MSA 11020 (Altoona, PA), consisting of Blair County, PA.
- MSA 39740 (Reading, PA), consisting of Berks County, PA.
- MSA 14100 (Bloomsburg-Berwick, PA) consisting of Columbia and Montour Counties, PA.
- MSA 16540 (Chambersburg-Waynesboro, PA), consisting of Franklin County, PA.
- MSA 20700 (East Stroudsburg PA), consisting of Monroe County, PA.
- MSA 23900 (Gettysburg, PA), consisting of Adams County, PA.
- MSA 29540 (Lancaster, PA), consisting of Lancaster County, PA.
- MSA 30140 (Lebanon, PA), consisting of Lebanon County, PA.

- MSA 44300 (State College, PA), consisting of Centre County, PA.
- MSA 48700 (Williamsport, PA), consisting of Lycoming County, PA.
- PA Nonmetropolitan area Group A, consisting of Bradford and Sullivan Counties, PA.
- PA Nonmetropolitan area Group B, consisting of Northumberland, Schuylkill, Snyder, and Union Counties, PA.
- PA Nonmetropolitan area Group C, consisting of Bedford County, PA and a portion of Huntingdon County, PA.
- PA Nonmetropolitan area Group D, consisting of Clearfield and Clinton Counties, PA.

State of Virginia

- MSA 40060 (Richmond, VA), consisting of Hanover, Henrico, and Richmond City Counties, VA.

M&T faced no financial or legal impediments that would prevent it from fulfilling its responsibilities under CRA or from helping to meet the credit needs of its assessment areas consistent with its business strategy, size, financial capacity, and local economic conditions.

Previous Public Evaluation

M&T received an Outstanding rating at the previous Performance Evaluation date September 29, 2014 CRA conducted by the Federal Reserve Bank of New York. The lending test was rated High Satisfactory, the investment test was rated Outstanding and the service test was rated Outstanding.

SCOPE OF EXAMINATION

Procedures

M&T's CRA performance was reviewed using the Federal Financial Institutions Examination Council's ("FFIEC") Interagency CRA Procedures for Large Institutions, which consists of the lending test, investment test, and service test.

Products

During this evaluation, examiners analyzed home purchase, refinance, and home improvement loans reportable under the Home Mortgage Disclosure Act ("HMDA"), as well as small business loans reportable under CRA. Examiners verified the integrity of the 2014-2018 HMDA and small business loan data reported by M&T and its affiliates. The inclusion of consumer loans is optional under the CRA regulation and M&T chose not to report consumer loans at this evaluation. Multifamily and small farm loans were excluded from the HMDA evaluation because there was

insufficient volume to conduct a meaningful analysis. However, multifamily loans qualifying as community development loans were considered in the evaluation of community development lending.

Evaluation Period

All HMDA-related and small business loans originated between January 1, 2014 and December 31, 2018 were considered in the evaluation. Community development loans, investments, philanthropic grants, and services provided between October 1, 2014 and December 31, 2019 were evaluated as qualifying community development activities.

Lending Distribution Analysis

Under the lending test, borrower and geographic loan distribution analyses were based on loan activity in M&T's assessment areas. M&T's performance in 2014-2016 was compared to the U.S. Department of Commerce's Bureau of the Census ("2010 Census") demographic data and M&T's 2017 and 2018 performance was compared to the 2011-2015 American Community Survey ("2015 ACS") demographic data.

To evaluate the geographic distribution, the proportion of home purchase, refinance, and home improvement loan originations located in low- and moderate-income geographies ("LMI") was compared to the proportion of owner-occupied housing units located in LMI geographies of the assessment areas. For small business loans, the analysis compared the proportion of loan originations located in LMI geographies with the proportion of businesses located in LMI geographies, based on Dun & Bradstreet ("D&B") data. Performance in low-income and in moderate-income geographies was analyzed separately. The lending analysis considered lending opportunities in low-income census tracts relative to moderate-income tracts as indicated by demographic data and aggregate lending patterns.

To analyze the distribution of home purchase, refinance, and home improvement lending by borrower profile, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment area. Median family income ("MFI") estimates from the FFIEC were used to categorize borrower income. For small business lending, M&T's proportion of loans to businesses with gross annual revenues ("GAR") of $1 million or less, based on D&B data, was compared to the proportion of all such businesses located in the assessment area. The size of the small business loans was also used as a proxy to identify lending to businesses with GAR of $1 million or less.

Demographic and economic information was also considered. Information was obtained from publicly available sources including the 2010 Census, the 2015 ACS, the U.S. Department of Labor ("DOL"), FFIEC, and U.S. Department of Housing and Urban Development ("HUD").

Borrower profile and geographic distribution analyses were also based on M&T's 2014-2018 performance, which was compared, respectively, to the 2014-2018 performance data for the aggregate of all loan reporters in the assessment areas. Aggregate lenders included all lenders required to report HMDA-reportable and CRA small business lending data within the respective assessment areas. For retail services, M&T's branch distribution analysis was conducted using data as of December 30, 2018.

Due to changes in HMDA reporting rules, 2018 HMDA lending activity is presented and discussed separately from 2014-2017 HMDA lending activity.

Community Development Activity Analysis

Community development activities were reviewed to determine whether the activity had community development as a primary purpose and met the geographic requirements of the CRA. The eligibility of a loan, investment, or service was based on demographic information available to M&T at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area. Additionally, if M&T met the needs of its assessment area, additional consideration was given to community development activities that were conducted in the broader statewide or regional area that included its assessment area.

Community Contacts

To understand community development and credit needs, several sources were utilized, including publicly accessible data and information submitted by M&T. Thirty-six (36) community contact interviews were conducted throughout the bank's assessment areas and included representatives of community-based organizations, municipalities, and governmental agencies. These organizations had expertise in their respective fields and were familiar with the economic, social, and demographic characteristics and community development opportunities in each assessment area. Information obtained from these interviews helped establish a context for the communities in which M&T operates.

Deriving Overall Conclusions

M&T's performance in New York State received the most weight in determining the bank's overall rating because of its concentration of deposits, lending, and branches. The States of Maryland and Pennsylvania were also weighted significantly. Maryland had 16.8% of the bank's total branches and 18.5% of deposits, while Pennsylvania had 17.3% of the bank's branches and 10.6% of the bank's deposits. The remaining assessment areas did not have a substantial effect on the overall rating based on lower deposit and lending volumes and market presence. To reach a conclusion

about the bank's overall lending performance in each assessment area, products were weighted based on their volume in the respective assessment area. For additional details, see Exhibit I, Summary of Key Assessment Area Data, which contains a summary of assessment area data for all rated areas.

Full scope reviews were conducted for the following assessment areas:

- **Multistate MSAs**: MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ), MSA 19060 (Cumberland, MD-WV), MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA), MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), and MSA 41540 (Salisbury, MD-DE)
- **State of Connecticut**: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)
- **State of Delaware:** MSA 20100 (Dover, DE)
- **State of Florida:** MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL)
- **State of Maryland:** MSA 12580 (Baltimore-Columbia-Towson, MD)
- **State of Massachusetts:** MD 14454 (Boston, MA)
- **State of New Jersey**: MSA 45940 (Trenton, NJ)
- **State of New York:** MSA 15380 (Buffalo-Niagara Falls, NY), MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and MSA 10580 (Albany-Schenectady-Troy, NY)
- **State of Pennsylvania:** MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), MSA 42540 (Scranton-Wilkes-Barre-Hazelton, PA), MSA 11020 (Altoona, PA), and MSA 39740 (Reading, PA)
- **State of Virginia:** MSA 40060 (Richmond, VA)

All other assessment areas received a limited scope review due to limited branching, branch deposits, and lending activity in the assessment area.

EXHIBIT I: Summary of Key Assessment Area Data																
	MSA 35620	MSA 47900	MSA 37980	MSA 41540	MSA 10900	MSA 19060	New York	Maryland	Pennsylvania	Delaware	Virginia	Connecticut	Massachusetts	Florida	New Jersey	TOTALS
Tracts % AA tracts	38.5%	10.6%	12.0%	0.7%	1.5%	<1%	11.7%	6.4%	7.7%	0.3%	1.3%	1.7%	2.8%	3.4%	1.2%	100.0%
LMI tracts	1,562	409	443	11	58	5	383	264	269	7	62	71	124	131	58	3,789
LMI tracts % all AA LMI tracts	41.2%	10.8%	11.7%	0.3%	1.3%	0.1%	10.1%	7.0%	5.5%	0.2%	1.6%	1.9%	3.3%	3.5%	1.5%	100.0%
Total Owner-Occupied Units[4]	3,616,197	1,255,303	1,491,573	101,683	220,521	25,937	1,421,746	788,264	1,105,084	42,185	149,312	228,381	284,613	459,484	111,362	11,301,645
Units % of AA units	32.0%	11.1%	13.2%	0.9%	2.0%	<1%	12.6%	7.0%	9.8%	0.4%	1.3%	2.0%	2.5%	4.1%	1.0%	100.0%
Business Establishments[5]	989,080	321,868	290,607	19,036	37,621	3,123	204,463	149,076	170,578	7,441	35,050	68,448	76,316	154,334	30,415	2,557,456
Bus. est. % AA bus. est.	38.7%	12.6%	11.4%	0.7%	1.5%	<1%	8.0%	5.8%	6.7%	0.3%	1.4%	2.7%	3.0%	6.0%	1.2%	100.0%
Number of Branches[1]	152	74	53	19	6	7	175	106	136	5	4	9	2	1	1	750
Branches % all branches	20.3%	9.9%	7.1%	2.5%	0.8%	0.9%	23.3%	14.1%	18.1%	0.7%	0.5%	1.2%	0.3%	0.1%	0.1%	100.0%
Branches in LMI tracts	31	24	13	2	0	1	37	29	30	3	1	1	0	0	1	173
LMI branches % AA LMI branches	17.9%	13.9%	7.5%	1.2%	0.0%	0.6%	21.4%	16.8%	17.3%	1.7%	0.6%	0.6%	0.0%	0.0%	0.6%	100.0%
Branch Deposits ($'000,000s)[2]	15,467	3,445	4,911	1,204	260	219	39,200	14,605	8,431	537	80	434	0	15	90	88,898
Deposits % AA deposits	17.4%	3.9%	5.5%	1.4%	0.3%	0.2%	44.1%	16.4%	9.5%	0.6%	0.1%	0.5%	0.0%	0.0%	0.1%	100.0%
Deposit Market Share (%)/ Rank in Market	.85% 19/201	1.7% 13/64	1% 12/117	1.7% 3/24	1.53% 17/32	22.3% 3/7	2.8% 8/210	18.5% 2/65	10.1% 2/83	6.6% 1/11	.07% 20/29	0.9% 18/29	n/a	.1% 38/53	.01% 51/52	n/a
Home Purchase Originations[3]	1,530	376	422	134	26	13	3,672	543	543	36	66	60	18	27	21	7,487
HP originations % AA orig.	20.4%	5.0%	5.6%	1.8%	0.3%	0.2%	49.0%	7.3%	7.3%	0.5%	0.9%	0.8%	0.2%	0.4%	0.3%	100.0%
Refinance Originations[3]	873	494	360	156	48	49	2,544	1,286	1,668	52	22	63	8	8	12	7,643
Refi orig. % AA orig.	11.4%	6.5%	4.7%	2.0%	0.6%	0.6%	33.3%	16.8%	21.8%	0.7%	0.3%	0.8%	0.1%	0.1%	0.2%	100.0%
Home Improvement Originations[3]	639	340	301	178	16	22	1,513	693	588	56	14	33	0	5	3	4,401
Home Improvement orig. % AA orig.	14.5%	7.7%	6.8%	4.0%	0.4%	0.5%	34.4%	15.7%	13.4%	1.3%	0.3%	0.7%	0.0%	0.1%	0.1%	100.0%
Small Business Originations[3]	1,924	1,215	816	342	62	96	3,945	1,859	2,099	92	43	103	59	11	27	12,693
SB orig. % AA orig.	15.2%	9.6%	6.4%	2.7%	0.5%	0.8%	31.1%	14.6%	16.5%	0.7%	0.3%	0.8%	0.5%	0.1%	0.2%	100.0%
Combined Loan Totals	4,966	2,425	1,899	810	152	180	11,674	4,381	4,898	236	145	259	85	51	63	32,224
% of AA Orig.	15.4%	7.5%	5.9%	2.5%	0.5%	0.6%	36.2%	13.6%	15.2%	0.7%	0.4%	0.8%	0.3%	0.2%	0.2%	100.0%

(1) Branch numbers are as of 12/31/2018. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/18. (3) Originations are loans reported under HMDA or CRA small business reporting for 2018. (4)Demographic information was obtained from the 2015 ACS. (5)Business establishments information was reported by Dun & Bradstreet for 2018.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

M&T's overall performance under the lending test is rated High Satisfactory. The major factors contributing to this overall rating are that the bank's lending levels reflected good responsiveness to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment areas for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans. Additionally, this conclusion is based on Outstanding performance in the multistate assessment areas of MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) and MSA 47900 (Washington-Arlington-Alexandria DC-VA-MD-WV) and High Satisfactory performance in the multistate assessment areas of MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ), and MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), and the States of Connecticut, New York, Maryland, Pennsylvania, and Delaware.

Performance was rated Low Satisfactory in the multistate assessment areas of MSA 19060 (Cumberland, MD-WV), and MSA 41540 (Salisbury, MD-DE), and the States of Florida, Massachusetts, New Jersey, and Virginia, which received less weight in the overall conclusion due to M&T's limited presence in these areas.

Throughout this report, references are made to M&T's and the aggregate's lending distribution by geography and borrower income. In some assessment areas and for some products, only general references are made comparing performance, thus the reader should refer to the tables for specific data. In addition, due to HMDA reporting changes implemented in 2018, HMDA data from 2018 will be presented and discussed separately from 2014-2017 HMDA data.

Lending Activity

M&T's lending levels reflect good responsiveness to the credit needs of the assessment areas, given the bank's capacity to meet assessment areas' credit needs and overall market conditions. This conclusion is based on excellent responsiveness to the credit needs of the assessment areas MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA), MSA 41540 (Salisbury, MD-DE), and MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), good responsiveness to the credit needs in the States of Delaware, Maryland, New York, and in the multistate assessment areas of MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) and MSA 10900 (Allentown-Bethlehem-Easton PA-NJ), and adequate responsiveness to the credit needs of the assessment areas in Pennsylvania, Connecticut, Virginia, Florida, Massachusetts, and New Jersey, as well as in the multistate assessment area MSA 19060 (Cumberland, MD-WV).

Summary of Lending Activity 2018				
Loan Type	**#**	**%**	**$(000s)**	**%**
Home Improvement	4,512	--	$347,678	--
Home Purchase	9,768	--	$2,125,019	--
Multi-Family Housing	161	--	$1,819,778	--
Refinancing	9,154	--	$1,536,383	--
Total HMDA related	**23,595**	**64**	**$5,828,858**	**72**
Total Non-HMDA related	**0**	**0**	**$0**	**0**
Small Business	13,265	--	$2,279,783	--
Total Small Business related	**13,265**	**36**	**$2,279,783**	**28**
TOTAL LOANS	**36,860**	**100**	**$8,108,641**	**100**

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

Summary of Lending Activity 2014-2017				
Loan Type	**#**	**%**	**$(000s)**	**%**
Home Improvement	9,658	--	$833,772	--
Home Purchase	54,673	--	$13,068,176	--
Multi-Family Housing	1,322	--	$11,685,913	--
Refinancing	29,213	--	$6,205,260	--
Total HMDA related	**94,866**	**71**	**$31,793,121**	**76**
Total Non-HMDA related	**0**	**0**	**$0**	**0**
Small Business	39,144	--	$10,003,716	--
Total Small Business related	**39,144**	**29**	**$10,003,716**	**23**
TOTAL LOANS	**134,010**	**100**	**$41,796,837**	**100**

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

In 2018, M&T made 36,860 home purchase, refinance, home improvement, and small business loans, totaling $8.1 billion. From 2014-2017, M&T made 134,010 home purchase, refinance, home improvement, and small business loans, totaling $41.8 billion, as detailed above. As the data show, M&T originated more HMDA-related loans than small business loans by number and dollar amount. As a result, HMDA-related lending typically had a greater impact on lending ratings.

Assessment Area Concentration

M&T originated a high percentage of loans in the bank's assessment areas, as detailed in the tables below. M&T made an adequate number of HMDA-related loans and a substantial majority of small business loans distributed within the assessment areas.

Lending Inside and Outside the Assessment Area January 1, 2018 - December 31, 2018								
Loan Types	**Inside**				**Outside**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
Home Improvement	4,401	97.5	$335,163	96.4	111	2.5	$12,515	3.6
Home Purchase	7,482	76.7	$1,575,607	74.1	2,274	23.3	$549,412	25.9
Multi-Family Housing	104	91.2	$885,635	95	10	8.8	$46,761	5.0
Refinancing	7,643	83.5	$1,171,397	76.2	1,511	16.5	$364,986	23.8
Total HMDA related	**19,630**	**83.4**	**$3,967,802**	**80.3**	**3,906**	**16.6**	**$973,674**	**19.7**
Small Business	12,084	95.5	$1,813,056	88.7	572	4.5	$230,481	11.3
Total Small Bus. related	**12,084**	**95.5**	**$1,813,056**	**88.7**	**572**	**4.5**	**$230,481**	**11.3**
TOTAL LOANS	**31,714**	**87.6**	**$5,780,858**	**82.8**	**4,478**	**12.4**	**$1,204,155**	**17.2**

Note: Affiliate loans not included

Lending Inside and Outside the Assessment Area January 1, 2014 -December 31, 2017								
Loan Types	**Inside**				**Outside**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
Home Improvement	9,029	94.1	$541,053	85.7	562	5.9	$90,453	14.3
Home Purchase	37,282	68.7	$8,663,117	69.9	17,000	31.3	$3,725,979	30.1
Multi-Family Housing	595	85.2	$4,624,088	75.4	103	14.8	$1,511,579	24.6
Refinancing	15,253	52.5	$3,505,607	57.6	13,817	47.5	$2,578,284	42.4
Total HMDA related	**62,159**	**66.4**	**$17,333,865**	**68.7**	**31,482**	**33.6**	**$7,906,295**	**31.3**
Small Business	34,544	94.6	$8,192,266	91.2	1,954	5.4	$794,202	8.8
Total Small Bus. related	**34,544**	**94.6**	**$8,192,266**	**91.2**	**1,954**	**5.4**	**$794,202**	**8.8**
TOTAL LOANS	**96,703**	**74.3**	**$25,526,131**	**74.6**	**33,436**	**25.7**	**$8,700,497**	**25.4**

Note: Affiliate loans not included

Geographic Distribution

The overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the assessment areas. This conclusion is based on excellent geographic distribution of HMDA-related and small business loans throughout multi-states of MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ), MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA), MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), and MSA 47900 (Washington-Arlington-Alexandria DC-VA-MD-WY), and in the States of Connecticut, and Maryland.

M&T's performance reflected good geographic distribution of HMDA-related and small business loans throughout the multistate assessment areas of MSA 19060 (Cumberland, MD-WV), MSA 41450 (Salisbury, MD), and the States of Delaware, Massachusetts, New Jersey, New York, and Pennsylvania.

Performance was adequate in the geographic distribution of HMDA-related and small business loans throughout the States of Florida and Virginia. The analysis considered performance contexts, such as the number of owner-occupied units in LMI geographies and the market

aggregate's performance. Consideration was given for the very limited lending opportunities available in some assessment areas, as denoted by the low number of loans made by the aggregate.

Distribution by Borrower Income and Revenue Size of Business

M&T's overall distribution of loans among borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. This conclusion is based on the fact that distribution of borrowers reflected, given the product lines offered good penetration among customers of different income levels and businesses of different sizes in the multi-states MSA 19060 (Cumberland, MD-WV), MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), MSA 41540 (Salisbury, MD-DE), MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) and in the states of Delaware, Maryland, New York, and Pennsylvania.

The distribution of loans among borrowers reflected, given the product lines offered, adequate penetration of different income levels and businesses of different sizes in the multistate assessment areas of MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) and MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA), and in the states of Connecticut, Florida, New Jersey, and Virginia.

The distribution of loans among borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes in the State of Massachusetts.

In making this conclusion, consideration was given for the very limited lending opportunities available in some assessment areas, as denoted by the low number of loans made by the aggregate.

Community Development Lending

M&T was a leader in making community development loans. As detailed in the table to the right, M&T extended 1,191 community development loans for a variety of community development purposes that total $8.5 billion.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$ ('000s)**
Affordable Housing	267	2,047,804
Economic Development	111	312,625
Community Services	593	3,068,367
Revitalize and Stabilize	220	3,029,617
Total	**1,191**	**$8,458,413**

M&T's was a leader in making community development loans in MSA 10900 (Allentown-Bethlehem-Easton, PA,NJ), MSA 35620 (New York-Newark-Jersey City, NY, NJ, PA), MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) and in the States of Connecticut, Maryland, Massachusetts, New York, and Virginia.

M&T made a relatively high level of community development loans in the States of Delaware, Florida, and Pennsylvania.

The bank made an adequate level of community development loans in MSA 19060 (Cumberland, MD-WV), MSA 41540 (Salisbury, MD-DE), and in the State of New Jersey.

M&T's community development lending was responsive to community needs. The community development loans originated during the evaluation period included a variety of community development purposes, with 36.3% of the dollar amount of all community development loans oriented towards community services that benefited LMI individuals, 35.8% for revitalization and stabilization of LMI communities and empowerment zones, 24.2% for the financing of affordable housing, and 3.7% for promotion of economic development, including job creation.

Finally, examiners determined M&T met the needs of its assessment areas; therefore, where submitted by the bank, consideration was given to community development loans that were made outside of its assessment areas benefitting the broader statewide and regional areas including the assessment area. M&T made 41 qualified community development loans totaling $356.7 million outside of its assessment areas benefitting the broader statewide and regional areas of the bank's assessment areas, including those made in New York, Pennsylvania, New Jersey, Virginia, Connecticut, and Massachusetts. These loans supported affordable housing, economic development, community services, and revitalization projects.

Product Innovation

M&T made extensive use of innovative or flexible products that served to enhance the level of lending in LMI geographies and to LMI borrowers. Examples of responsive products targeted to specific community needs in the bank's various assessment areas include:

- M&T's "Get Started" loan program was designed for borrowers who purchased or refinanced a residence in a specified LMI census tract, in a M&T designated area, or whose income was at or below 80% of the HUD Median Area Income in those areas. Get Started loans were also available to borrowers, with no income restrictions, purchasing or refinancing a residence in a majority-minority census tract. During 2015 through 2019, M&T originated 348 Get Started mortgages totaling $35,109,460. The Get Started loan program was available during the review period until September 2019, when it was discontinued and replaced by the Home Starter loan program.

- M&T's "Home Starter" loan program, launched in September 2019, was designed for borrowers purchasing a residence in a specified LMI census tract, in M&T designated areas or whose income was at or below 80% of the HUD Median Area Income. There are no income restrictions for loans in designated tracts. Refinances are permitted when the mortgage program is a Get Started or Home Starter loan. Designed to complement and replace the Get Started portfolio, the Home Starter product offers a competitive interest rate, low 3% down payment, no borrower paid mortgage insurance premium, and the ability to finance most closing costs.

- M&T offers FHA loans with below market interest rates for eligible borrowers purchasing a home.

- M&T offers mortgage programs in conjunction with six states and the District of Columbia; the largest being the State of New York Mortgage Agency ("SONYMA") program for New York State for first time homebuyers.

- M&T's FHA, VA, and USDA community loan products offer discounted rates to applicants purchasing homes in LMI communities or those who are LMI borrowers. M&T offers a lender credit up to $2,000 for closing costs.

- In June of 2018, M&T introduced a Business Credit Card with credit limits as low as $2,000 available to nonprofit organizations, which generally target services to LMI individuals. The card has no annual fee and a 12-month introductory rate at 0%.

INVESTMENT TEST

M&T's performance under the investment test is rated Outstanding based on Outstanding ratings in the following geographies: MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) and MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), and the States of New York and Maryland.

M&T's performance was rated High Satisfactory in the multistate assessment areas of MSA 41540 (Salisbury, MD-DE) and MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) and the States of Delaware and Pennsylvania.

Performance was rated Low Satisfactory in the multi-states of MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) and MSA 19060 (Cumberland, MD-WV) and the States of Connecticut, Florida, Massachusetts, New Jersey, and Virginia, generally where the bank had limited presence.

As shown in the table, M&T provided an excellent level of qualified investments and grants, particularly those not provided by private investors, often in a leadership position. Qualified investments totaled approximately $1.8 billion, which included 261 new investments totaling $1.6 billion. In addition, the bank had prior period investments with outstanding balances of $224.6 million. Grants and donations to community development organizations totaled $48.6 million.

QUALIFIED INVESTMENTS		
Purpose	**#**	**$ ('000s)**
Affordable Housing	805	1,049,937
Community Services	18	387,715
Economic Development	2	25,975
Revitalization & Stabilization	19	323,268
Total	**844**	**$1,786,895**

Finally, examiners determined M&T adequately addressed the needs of its assessment area; therefore, consideration was given to community development qualified investments outside of the bank's assessment areas located in the broader statewide or regional area including the assessment area.

M&T made significant use of innovative and/or complex investments to support community development initiatives. M&T made 43.6% of total investments in LIHTC, which are considered complex investments that support community development initiatives.

M&T exhibited good responsiveness to community development needs. In terms of dollar volume, qualified investments primarily supported the development of affordable housing, which according to community contacts, was an important community credit need, with $1.0 billion or 58.8% of total investments dedicated to affordable housing initiatives, particularly with complex investments.

In addition to total qualified investments, M&T made grants and donations totaling $48.6 million during the review period.

SERVICE TEST

M&T's overall rating on the service test is Outstanding based primarily on Outstanding ratings in the multistate assessment areas of MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) and MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE), and in the States of Maryland and New York.

Performance was rated High Satisfactory in the multi-states of MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) and MSA 41540 (Salisbury, MD-DE), and in the States of Pennsylvania, Delaware, and New Jersey.

Performance was rated Low Satisfactory in multistate MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) and multistate MSA 19060 (Cumberland, MD-WV), and in the States of Connecticut, Florida, and Virginia. Performance was rated Needs To Improve in the State of Massachusetts.

Retail Services

Delivery systems were readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. The bank operated State750 branches, of which 47 (6.3%) were in low-income tracts and 126 (16.8%) were in moderate-income tracts. Alternative delivery systems enhanced the bank's performance through multiple options. M&T operated 782 off-site ATM locations throughout its assessment areas, of which 42 (5.4%) were located in low-income areas and 110 (14.1%) were located in moderate-income areas. In addition, the bank offered alternative delivery systems, such as: bank by-mail, telephone sales, and 24-hour automated services, not specifically targeted to LMI individuals but serving all bank customers. M&T maintained a full-service, completely digital website, which offered customers online banking

products, including checking and savings accounts, money market accounts, and Certificates of Deposit ("CDs"), and electronic statements. Customers were able initiate residential home loan and home equity finance applications online.

M&T's products and services were also accessible through the bank's mobile application, which was available on both Android and IOS platforms. In addition, the bank's website offered a suite of products and services to business customers.

M&T also had business relationships with 20 other financial institutions, which allow the bank's customers to use the ATMs owned by these institutions free of charge. Four of these ATMs were in LMI areas.

M&T's record of opening and closing branches did not adversely affect accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals. M&T opened a total of four branches during the evaluation period. One new branch was located in a low-income census tract, one was in a moderate-income census tract, one was in an upper-income census tract, and one was opened in an unknown-income census tract that was adjacent to six low- and moderate-income census tracts. M&T also closed 33 branches during the evaluation period, of which two were in low-income census tracts and four were in moderate-income census tracts. The branch closures were in part a result of overlapping locations from the Hudson City Savings Bank acquisition.

Services did not vary in a way that inconvenienced the needs of its assessment areas, particularly LMI geographies and/or LMI individuals. Generally, weekend and extended hours did not vary when comparing branches in LMI areas and non-LMI areas. However, in MSA 41540 (Salisbury, MD), and in the States of Delaware, Maryland, and New Jersey, the bank's hours were tailored to the needs of the assessment area, while in Massachusetts and Florida the bank's hours varied in a way that inconvenienced the assessment area. However, due to the relatively low number of branches and activities conducted in Massachusetts and Florida, the variance did not have an impact on the overall accessibility of the institution's branching.

Community Development Services

M&T was a leader in providing community development services throughout its assessment areas. The table demonstrates the level and type provided, including sponsoring, and participating in a significant number of seminars and presentations relating to affordable mortgages, small business assistance, and other financial education throughout the

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education Seminars	11,221
Small Business	248
Technical Assistance	108
Total	**11,577**

assessment areas. These types of events provided technical assistance and training to LMI individuals, community organizations, small businesses, and housing agencies.

M&T employees also served on the boards and committees of 2007 community development organizations and provided financial management expertise and technical assistance to these organizations.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Dodd-Frank Act") established the Consumer Financial Protection Bureau ("CFPB"). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than $10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve, however, retains authority to enforce compliance with M&T's CRA and certain other consumer compliance laws and regulations.

M&T is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices was identified as being inconsistent with helping to meet community credit needs.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR MSA 10900 (ALLENTOWN-BETHLEHEM-EASTON, PA-NJ)[1]: SATISFACTORY

The Lending test is rated: High Satisfactory

The Investment test is rated: Low Satisfactory

The Service test is rated: Low Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the bank's assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- An adequate level of qualified community development investments and grants, particularly those not routinely provided by investors, rarely in a leadership position.
- Made rare use of innovative and/or complex investments to support community development initiatives.
- Exhibited adequate responsiveness to credit and community development needs.

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

Service Test:

- Delivery systems that were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced its assessment area particularly LMI geographies and/or Individuals.
- Provided a relatively high level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted of M&T's performance in multistate MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ). While activities in this multistate MSA made up less than 1.0% of the bank's deposits, branches, and loans, it was evaluated under full scope procedures as it was a multistate MSA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 10900 (ALLENTOWN-BETHLEHEM-EASTON, PA-NJ)

As of December 31, 2018, M&T had six branches in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ), which represented less than 1.0% of the bank's overall branches and deposits. The MSA also contained less than 1.0% of the bank's HMDA and small business loans. M&T had a deposit market share of 1.5% of deposits as reported by the FDIC as of June 30, 2018, ranking 17th out of 32 banks in the MSA. Area competitors in the market include Wells Fargo Bank, NA, Branch Banking and Trust Co, PNC Bank, NA, Bank of America, NA, Santander Bank, NA, and TD Bank, NA.

Community Contacts

To learn more about community credit needs, examiners conducted an interview with a nonprofit agency. The contact identified several community needs in the assessment area, including affordable housing and first-time home buyer mortgage programs, particularly in Allentown, Bethlehem, and Easton. The contact also identified small business development as a need in the assessment area. Specifically, the contact noted a need for increased bank participation in small business lending, particularly working capital loans to very small businesses. In addition, it was noted that technical assistance and improved funding resources for entrepreneurs was a need for small businesses. Finally, the contact stated financial literacy courses was needed for those interested in obtaining and maintaining a home.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) consisted of Carbon County, Lehigh County, Northampton County PA, and Warren County, NJ. The assessment area is comprised of the MSA in its entirety. Situated in the area known as the Lehigh Valley, the MSA includes the cities of Allentown, Bethlehem, and Easton in Pennsylvania and the town of Phillipsburg in New Jersey.

In 2018, the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) population totaled 828,232. The New Jersey portion of the MSA population totaled 107,226, or 12.9% of the MSA's total population. The Pennsylvania portion of the MSA population totaled 721,006, or 87.1% of the MSA total population.

In 2018, of the 179 census tracts in the assessment area, 16 or 8.9%, were low-income, 34 or 19.0% were moderate-income, 78 or 43.6% were middle-income, 51 or 28.5% were upper-income.

Income Characteristics

In 2018, the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area had 214,409 families, of which 20.5% were considered low-income, 18.1% are moderate-income and 7.9% were below the poverty level. The FFIEC median incomes for the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) for the 2010 census and the 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$68,935	$71,539
Warren County, NJ	$85,635	$85,568
Carbon County, PA	$54,918	$58,605
Lehigh County, PA	$66,004	$68,605
Northampton, County, PA	$70,457	$73,571
State of Pennsylvania	$84,904	$68,158
State of New Jersey	$63,364	$88,935

Housing Characteristics

In 2018, MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) had 343,976 housing units, of which 64.1% were owner-occupied and 27.3% were rental units. Of the available owner-occupied units, 17.1% were located in LMI areas. As a portion of all housing types in low-income census tracts, 57.6% of the housing units were rental units, 15.5% vacant, and 26.9% were owner-occupied. In moderate-income census tracts, 54.0% of the housing units were either rental or vacant, and 46.0% were owner-occupied.

In 2018, the median age of housing stock in the assessment area was 49 years old, with 32.2% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans.

In 2018, the median housing value in the assessment area was $199,777, with an affordability ratio of 29.4. The median gross rent in the assessment area was $941 per month. Within the assessment area, 50.4% of all renters had rental costs that exceeded 30% of their incomes, making it difficult for renters to save for a down payment to purchase a home, given housing prices.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$215,234	26.4	$199,777	29.3	$829	$941	13.5%
Warren County, NJ	$307,300	23.2	$255,300	27.6	$941	$1,013	7.7%
Carbon County, PA	$139,800	34.2	$144,700	34.5	$659	$773	17.3%
Lehigh, County, PA	$203,200	26.4	$191,700	29.3	$822	$929	13.0%
Northampton County, PA	$220,800	26.6	$206,100	29.6	$829	$957	15.4%
State of Pennsylvania	$159,300	31.6	$166,000	32.3	$739	$840	13.7%
State of New Jersey	$357,000	19.6	$315,900	22.8	$1,092	$1,191	9.1%

Labor, Employment and Economic Characteristics

Located in eastern Pennsylvania, the Allentown MSA is situated between the Philadelphia and New York City metropolitan areas. The local economy is largely supported by the region's niche in transportation and warehousing jobs. The Allentown MSA has successfully capitalized on its proximity to major interstate systems, airports, and large northeastern markets, and now boasts the

fourth highest concentration of logistics jobs in the northeastern United States. Further, tourism continues to grow, with the addition of another 300-room hotel tower planned in connection with the Wind Creek Bethlehem Casino, which was purchased by Wind Creek Hospitality in 2019.

According to D&B data, the assessment area had a total of 37,671 businesses in 2018, of which 34,290 (91.0%) were small businesses with GAR of $1 million or less.

The unemployment rate decreased over the review period, falling more sharply in the beginning of the period and remaining more consistent the remainder of the review period. See the following table for details.

U.S. Department of Labor **Annual Unemployment Rates**					
Geographic Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	6.1	5.4	5.2	4.9	4.4
Warren County, NJ	6.3	5.4	4.6	4.2	3.8
Carbon County, PA	7.1	6.1	6.0	5.5	5.0
Lehigh County, PA	6.1	5.3	5.3	5.0	4.6
Northampton County, PA	6.0	5.2	5.2	4.9	4.4
State of Pennsylvania	5.9	4.7	4.8	4.3	3.8
State of New Jersey	6.8	5.8	5.0	4.6	4.1

Additional performance context data for this assessment area is provided in the subsequent MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area(s) : Allentown-Bethlm-Easton, PA-NJ (MSA 10900) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	8.9	13,315	6.2	4,633	34.8	44,006	20.5
Moderate-income	34	19	36,343	17	5,648	15.5	38,780	18.1
Middle-income	78	43.6	89,783	41.9	4,747	5.3	45,189	21.1
Upper-income	51	28.5	74,968	35	1,890	2.5	86,434	40.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**179**	**100.0**	**214,409**	**100.0**	**16,918**	**7.9**	**214,409**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,037	6,742	3.1	26.9	14,409	57.6	3,886	15.5
Moderate-income	66,903	30,801	14	46	27,624	41.3	8,478	12.7
Middle-income	146,249	97,346	44.1	66.6	36,765	25.1	12,138	8.3
Upper-income	105,787	85,632	38.8	80.9	14,986	14.2	5,169	4.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**343,976**	**220,521**	**100.0**	**64.1**	**93,784**	**27.3**	**29,671**	**8.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,115	5.6	1,900	5.5	193	6.6	22	4.7
Moderate-income	5,886	15.6	5,288	15.4	534	18.3	64	13.6
Middle-income	15,618	41.5	14,279	41.6	1,118	38.4	221	47.1
Upper-income	14,052	37.3	12,823	37.4	1,067	36.6	162	34.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**37,671**	**100.0**	**34,290**	**100.0**	**2,912**	**100.0**	**469**	**100.0**
	Percentage of Total Businesses:			**91.0**		**7.7**		**1.2**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10900 (ALLENTOWN-BETHLEHEM_EASTON, PA-NJ)

LENDING TEST

M&T's performance under the lending test in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) was rated High Satisfactory. This conclusion is based on the bank being a leader in making community development loans, lending levels reflected good responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment area, and the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.

Greater weight was given to the analysis of small business and refinance lending performance, followed by home improvement and home purchase lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the

evaluation of community development lending, and small farm lending was not evaluated as volume was insufficient for analysis.

Lending Activity

M&T's lending levels reflected good responsiveness to assessment area credit needs in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ). This conclusion is based on lending activity levels, market share performance and comparison to market aggregate data. Performance in HMDA-related lending was considered adequate while small business lending was good. For the five-year evaluation period, lending activity totaled 841 loans consisting of 241 home purchase, 152 refinance, 55 home improvement and 393 small business loans. HMDA and small business volumes for the evaluation period decreased by 31.3% on an annualized basis compared to the last evaluation period. Lending activity overall declined compared to the prior two-year period, during which lending activity totaled 490 loans consisting of 149 home purchase, 172 refinance, 9 home improvement, and 160 small business loans. This decline was driven primarily by decreases in home purchase (-35.3%), refinance (-64.7%), and small business lending (-1.8%). However, an annualized increase was demonstrated in home improvement (144.4%) loan volume. Analysis of the aggregate lending on an annualized basis indicated an increase in aggregate lending from the previous evaluation.

M&T's market share of deposits in the assessment area increased while lending market share was generally stable. In 2018, M&T had a deposit market share of 1.5%, and lending market shares of 0.9% in home purchase lending and 0.5% in refinance, 0.3% in home improvement and 0.8% in small business lending. In comparison, the deposit market share in 2014 was 0.6%, with lending market shares of 0.6% in home purchase lending and 0.5% in both refinance and home improvement and 0.8% small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans throughout the multistate MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area reflected good penetration. Lending penetration in LMI tracts was excellent for small business lending, and good for home purchase, refinance, and home improvement lending.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 46.9% of all census tracts in the assessment area when evaluating HMDA and small business lending. In 2018, HMDA and small business lending penetrated 12.5% of low-income census tracts in the AA and 41.2% of moderate-income census tracts. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending was generally comparable to 2018 performance, as the bank penetrated 44.7% of all census tracts in 2017, 49.2% in 2016, 49.2% in 2015 and 55.3% in 2014. There were no conspicuous gaps in the distribution of the bank's lending activity.

MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	16	14	12.5%
Moderate	34	20	41.2%
Middle	78	39	50.0%
Upper	51	22	56.9%
Unknown	0	0	0.0%
Total Tracts	179	95	46.9%
2017			
Low	16	11	31.3%
Moderate	34	18	47.1%
Middle	78	41	47.4%
Upper	51	29	43.1%
Unknown	0	0	0.0%
Total Tracts	179	99	44.7%
2016			
Low	16	14	12.5%
Moderate	38	19	50.0%
Middle	76	37	51.3%
Upper	49	21	57.1%
Unknown	0	0	0.0%
Total Tracts	179	91	49.2%
2015			
Low	16	12	25.0%
Moderate	38	25	34.2%
Middle	76	35	53.9%
Upper	49	19	61.2%
Unknown	0	0	0.0%
Total Tracts	179	91	49.2%
2014			
Low	16	10	37.5%
Moderate	38	14	63.2%
Middle	76	35	53.9%
Upper	49	21	57.1%
Unknown	0	0	0.0%
Total Tracts	179	80	55.3%

Home Purchase

The geographic distribution of home purchase loans generally reflected good penetration throughout the assessment area. However, in 2018, the bank did not make any home purchase loans in low-income census tracts. Home purchase performance was below the 3.1% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 4.2% by number and 2.2% by dollar in low-income census tracts. In 2018, the bank made 15.4% home purchase loans by number and 9.2% by dollar in moderate-income census tracts. The bank's home purchase lending performance exceeded the 14.0% of owner-occupied housing units located in moderate-income census tracts but was slightly below the aggregate, which made 17.6% by number and 11.8% by dollar in moderate-income census tracts.

In 2014-2017, home purchase performance was generally consistent with 2018's performance, as the bank did not make any home purchase loans in low-income census tracts in 2014 and 2016, made one loan in 2015. However, in 2017, the bank's home purchase lending in low-income census tracts exceeded the demographic and the aggregate.

In moderate-income census tracts performance was above 2018 performance for 2014 and 2017, below performance in 2018 and 2016, and generally consistent with 2018 performance in 2015. In 2014 and 2017, home purchase lending in moderate-income census tracts exceeded the demographic and the aggregate. In 2015, the bank's home purchase lending in moderate-income census tracts was comparable to the demographic and the aggregate. In 2016, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected good penetration throughout the assessment area, largely attributable to lending performance in moderate income census tracts. In 2018, the bank made 2.1% by number and 1.8% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was below the 3.1% of owner-occupied housing units located in low-income census tracts. Refinance lending performance in low-income census tracts was comparable to the aggregate, which made 2.7% by number and 1.4% by dollar in low-income census tracts. In 2018, the bank made 27.1% by number and 20.4% by dollar of refinance loans in moderate-income census tracts exceeding the 14.0% of owner-occupied housing units located in moderate-income census tracts. M&T's refinance lending in moderate-income census tracts also exceeded the aggregate, which made 12.7% by number and 8.3% by dollar in moderate-income census tracts.

In 2014, the bank's refinance lending in low-income census tracts was below the demographic and the aggregate and, in 2015, the bank made no refinance loans in low-income census tracts. In 2016 and 2017, the bank's refinance lending in low-income census tracts exceeded the demographic and the aggregate. Refinance lending in moderate-income census tracts for 2014 and 2016 exceeded the demographic and the aggregate, while in 2015 performance was below the demographic and

the aggregate. The bank's refinance lending in moderate-income census tracts for 2017 was comparable to the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank did not make any home improvement loans in low-income census tracts while 3.1% of owner-occupied housing units were located in low-income census tracts. Home improvement lending in low-income census tracts was also below the aggregate, which made 1.6% by number and 1.3% by dollar in low-income census tracts. In 2018, the bank made 12.5% by number and 20.0% by dollar of home improvement loans in moderate-income census tracts. The bank's home improvement lending performance by number, was slightly below the 14.0% of owner-occupied housing units located in moderate-income census tracts. M&T's home improvement lending in moderate-income census tracts exceeded the aggregate, which made 9.9% by number and 8.3% by dollar in moderate-income census tracts.

In 2014-2017, the bank's home improvement lending was comparable to performance in 2018. In 2014, 2015, and 2016, the bank did not make any home improvement loans in low-income census tracts. In 2017, the bank's home improvement lending in low-income census tracts exceeded the demographic and the aggregate. In moderate-income census tracts, performance exceeded the demographic and aggregate in 2014, and 2016 while in 2017 was above the demographic and aggregate. In 2015, performance was below demographic and aggregate.

Small Business

The geographic distribution of small business loans reflected excellent penetration throughout the assessment area, driven by performance in 2014-2017. In 2018, M&T's small business lending was 3.2% by number and 0.7% by dollar in low-income census tracts. M&T's lending was below the demographic, which indicated 5.6% of business establishments were in low-income census tracts and also below the aggregate, which made 5.1% by number and 5.3% by dollar in low-income census tracts. In 2018, the bank made 16.1% by number and 9.3% by dollar of small business loans in moderate-income census tracts, exceeding the demographic of 15.6% of businesses located in moderate-income census tracts. Performance exceeded the aggregate by number and was below aggregate by dollar, which made 15.2% by number and 15.0% by dollar in moderate-income census tracts.

Performance in 2014-2017 was above 2018 performance. In low-income census tracts, performance exceeded the demographic and aggregate in 2014, 2015 and 2017 while, in 2016, was below the demographic and aggregate. In moderate-income census tracts, performance exceeded the demographic and the aggregate for 2014, 2016, and 2017, while in 2015 was comparable to the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was adequate and lending to businesses with gross annual revenues of $1 million or less was poor.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase lending. In 2018, the bank made 3.8% by number and 0.9% by dollar to low-income borrowers and was significantly below the 20.5% of low-income families in the assessment area. Performance was also below aggregate lending, which made 8.1% by number and 4.5% by dollar to low income families. The bank's lending to moderate-income borrowers was 34.6% by number and 28.2% by dollar, which was significantly above both the aggregate performance of 20.6% by number and 15.4% by dollar, and the 18.1% of moderate-income families in the assessment area.

M&T's overall lending to low-income borrowers for 2014-2017 was slightly above the bank's 2018 lending performance. Lending to low-income borrowers was consistent with the aggregate data lending in 2016-2017. In 2014 and 2015, the bank's lending was more consistent with 2018 performance as lending performance was below the aggregate lending data and significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was slightly below the 2018 performance. While the bank's lending in 2016 was consistent with 2018 performance, exceeding both the aggregate performance and the demographic figure, lending in 2015 and 2017 to moderate-income borrowers was comparable to both the aggregate lending data and the demographic figure. Lending in 2014 fell below both the aggregate lending data and the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income for refinance lending. In 2018, the bank's lending to low-income borrowers was 12.5% by number and 11.2% by dollar and was slightly above with the aggregate lending data, at 9.2% by number and 5.0% by dollar. However, M&T's performance was below the 20.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.7% by number and 11.9% by dollar, was comparable to both the aggregate lending data at 18.2% by number and 13.2% by dollar, and the 18.1% of moderate-income families.

M&T's lending to low-income borrowers for 2014-2017 was slightly below the bank's 2018 lending performance. While performance in 2015 and 2017 was comparable to the aggregate lending data, performance in 2014 and 2016 was below, as the bank did not make any loans in low-income tracts. Through 2014-2017, lending to low-income borrowers fell below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was also below the 2018 performance as the bank's lending was below both the aggregate lending and demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home improvement lending. The bank's 2018 lending to low-income borrowers was 6.3% by number and 9.4% by dollar. Performance was consistent with the aggregate lending data at 7.4% by number and 5.2% by dollar; however, performance was below the 20.5% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 18.8% by number and 15.9% by dollar, was slightly above the aggregate lending data at 15.5% by number and 11.8% by dollar and was consistent with the number of moderate-income families in the assessment area, at 18.1%.

Lending to low-income borrowers in 2015 and 2017 was above the aggregate data lending, the bank's 2016 lending was comparable, and 2014 lending fell below. In 2014, 2016, and 2017, lending fell below the demographic figure. However, 2015 lending was comparable to the demographic. The bank's lending to moderate-income borrowers in 2014-2017 was above 2018 performance. The bank's lending exceeded both the aggregate lending data, and the demographic figure in 2014, 2016, and 2017. In 2015, lending was comparable to both aggregate lending data and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, poor penetration among businesses of different sizes. In 2018, the bank originated 30.6% of loans by number and 12.9% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending was significantly below aggregate lending data, at 47.1% by number and 37.3% by dollar, in addition to being significantly below the 91.0% percentage of businesses in the assessment area with gross annual revenues of $1 million or less. The bank also only originated 48.4% of loans to assessment area businesses in amounts of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. The bank's lending was below aggregate lending data and significantly fell below the demographic figure. Additionally, in 2014-2017, the bank originated less than 50.0% of their loans in amounts of $100,000 or less.

Community Development Lending

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Economic Development	1	20,000
Revitalize and Stabilize	11	312,148
Total	**12**	**$332,148**

As shown in the table, M&T was a leader in making community development loans in multistate MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) with 12 community development loans, totaling $332.1 million. M&T ranked above three similarly-situated banks when comparing annualized community development loans to deposits within the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area. Community development lending was responsive to identified needs within MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ).

Examples of community development lending include:

- Five loans totaling $253.0 million for new construction in a low-income tract within a designated revitalization zone established in the city of Allentown, Pennsylvania.
- A $21.5 million construction to permanent loan for a mixed-use building in a low-income tract within a government designated zone to foster innovation and create entrepreneurial opportunities.
- A $20.0 million line of credit to help create an SBIC to provide equity financing, long-term loans, and management services to U.S. small businesses looking to grow and expand.

INVESTMENT TEST

M&T's performance in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) under the investment test is rated Low Satisfactory. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made rare use of innovative or complex investments to support community development initiatives, and the bank exhibited adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 11 qualified investments, consisting of $781,000 current period and $706,000 prior period investments, for an approximate total of $1.5 million. M&T ranked 2nd of five similarly-situated banks when comparing annualized community development investments to deposits within the MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) assessment area. The bank made one new investment totaling $781,000 that benefited the assessment area and supported affordable housing through the purchase of a mortgage-backed security. All ten prior period investments were also in mortgage-backed securities.

Qualified Community Development Investments by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) - New	1	781	0	0	0	0	0	0	1	781
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) – Prior Period	10	706	0	0	0	0	0	0	10	706
Total	11	1,487	0	0	0	0	0	0	11	1,487

In addition to qualified investments, the bank made 53 grants or donations totaling $344,950 in the assessment area during the evaluation period. The grants and donations were primarily comprised of funds for community services.

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ)	0	0	53	344,950	0	0	0	0	53	344,950

SERVICE TEST

M&T's performance under the service test in MSA 10900 (Allentown-Bethlehem-Easton, PA-NJ) was rated Low Satisfactory based on delivery systems that were unreasonably inaccessible to portions of the bank's geographies and individuals of different incomes levels in the assessment area, changes in branch locations did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals, and services did not vary in a way that inconvenienced the needs of its the assessment area particularly LMI geographies and/or LMI individuals. M&T provided a relatively high level of community development services.

Retail Services

M&T's delivery systems were unreasonably inaccessible to portions of geographies and individuals of different income levels in this assessment area. M&T operated six branches in this assessment area, of which none of the branches were in low- or moderate-income areas. This compares inadequately to the 7.6% and 19.1% of the MSA's population residing in low- and moderate-income areas.

Alternative delivery systems enhanced the bank's performance in this assessment area due to ATMs located in moderate-income areas. M&T had seven off-site ATM locations in the assessment area, of which none were in low-income areas and three (42.8%) were in moderate-income areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. M&T did not close any branches within the assessment area.

The bank's hours and services did not vary in a way that inconvenienced the needs of the assessment area; however, no branches were located in low- and moderate-income areas.

Community Development Services

M&T provided a relatively high-level of community development services in the assessment area. The bank conducted a total of 33 community development service activities, which consisted primarily of mortgage education seminars.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education Seminars	19
Small Business	0
Technical Assistance	1
Board Participation	13
Total	**33**

MULTISTATE METROPOLITAN AREA

CRA RATING FOR MSA 19060 (CUMBERLAND, MD-WV)[2]: SATISFACTORY

The Lending test is rated: Low Satisfactory

The Investment test is rated: Low Satisfactory

The Service test is rated: Low Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the bank's assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- Made an adequate level of community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- An adequate level of qualified community development investments and grants, particularly those not routinely provided by investors, rarely in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.
- Exhibited adequate responsiveness to credit and community development needs.

[2] This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Service Test:

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced the needs of its assessment areas particularly in LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted of M&T's performance in multistate MSA 19060 (Cumberland, MD-WV). While activities in this multistate MSA made up less than 1.0% of the bank's deposits, 1.0% of branches, and less than 1.0% of the bank's loans, a full scope review was conducted due to the assessment area being a multistate MSA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 19060 (CUMBERLAND, MD-WV)

As of December 31, 2018, M&T had seven branches in MSA 19060 (Cumberland, MD-WV), which represented less than 1.0% of the bank's overall branches and deposits. The MSA also contained less than 1.0% of the bank's HMDA and small business loans. With a deposit market share of 22.3%, M&T ranked 3rd out of seven banks in deposit market share in this MSA assessment area. Area competitors in the market include First United Bank & Trust, PNC, and Branch Banking & Trust.

Community Contacts

A community contact was conducted with a nonprofit economic development corporation that is the official economic development corporation for the city of Cumberland. The contact noted that the city is now growing economically after many years of decline. A growing local tourist industry, serving as a regional medical center and acting as the economic and commercial hub for Western Maryland has helped with these changes. The contact noted that the downtown area is under-going revitalization with more restaurants and local businesses opening. The contact indicated that a limited number of banks service the area but participation by the area's financial institutions, especially the local ones, is good. The contact also noted that smaller banks are more aggressive in meeting the needs of the community, especially providing small dollar loans. According to the contact, all banks are involved in the community volunteering for local functions and events. The contact noted that there is sufficient affordable housing in the community but there is a need for market rate housing; however, construction costs are high and housing prices

are low. The contact also noted that businesses both large and small are having difficulty attracting new employees and that several businesses were working with the local junior college for workforce development programs to fill the gap by providing skills training to meet business needs.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 19060 (Cumberland, MD-WV) consisted of Allegany County, Maryland and Mineral County, West Virginia. The assessment area was comprised of the entire MSA.

In 2018, MSA 19060 (Cumberland, MD-WV)'s population totaled 101,304. The Maryland portion of the MSA population totaled 73,549, or 72.6% of the MSA total population. The West Virginia portion of the MSA population totaled 27,755, or 27.4% of the MSA total population.

In 2018, of the 30 census tracts in the assessment area, there were no low-income census tracts, five or 16.7% moderate-income tracts, 20 or 66.7% middle-income tracts, and five or 16.7% upper income tracts.

Income Characteristics

In 2018, the MSA 19060 (Cumberland, MD-WV) assessment area had 23,667 families, of which 21.3% (11.8% of which was below the poverty level) were considered low-income, 18.2% were moderate-income, 20.1% were middle-income, and 40.4% were upper-income. The FFIEC-estimated median incomes for the MDs comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$51,751	$53,566
Allegany County, MD	$52,680	$55,405
Mineral County, WV	$46,820	$50,078
State of Maryland	$85,098	$90,089
State of West Virginia	$48,896	$52,866

Housing Characteristics

In 2018, MSA 19060 (Cumberland, MD-WV) had 46,338 housing units, of which 56.0% were owner-occupied and 29.5% were rental units. Of the available owner-occupied units, 12.8% were located in moderate-income census tracts. In moderate-income census tracts, 56.7% of the housing units were either rental or vacant, and 43.3% were owner-occupied.

In 2018, the median age of housing stock in the assessment area was 54 years old, with 36.4% of the stock built before 1950. The median age of housing stock was 61 years in moderate-income tracts, which indicated a possible need for home improvement loans. The median housing value in the assessment area was $120,244, with an affordability ratio of 31.7. The median gross rent in the assessment area was $582 per month. Within the assessment area, 43.0% of all renters had rental costs that exceeded 30% of their incomes.

The table below presents housing characteristics from the 2010 Census and the 2015 ACS for the assessment area and the States of Maryland and West Virginia.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$116,169	32.5	$120,244	31.7	$527	$582	10.4%
Allegany County, MD	$116,800	32.3	$120,800	33.6	$537	$624	16.2%
Mineral County, WV	$114,700	31.9	$118,800	26.8	$485	$531	9.5%
State of Maryland	$329,400	21.5	$286,900	26.0	$1,091	$1,230	12.7%
State of West Virginia	$94,500	40.6	$103,800	40.2	$549	$643	17.1%

Labor, Employment and Economic Characteristics

MSA 19060 (Cumberland, MD-WV) is primarily rural in nature. Over the past several years, the economy has remained somewhat stagnant with many residents commuting to the nearby cities of Winchester, Virginia and Hagerstown, Maryland for employment opportunities. The region's manufacturing and trade sectors are considered weaker and the economy is expected to grow more slowly than the national average. Within the City of Cumberland, major employers included: Western Maryland Health System, Frostburg State University, Allegany County Board of Education, and CSX Railroad. The presence of several prisons and call centers also provided employment opportunities in the area.

According to D&B data, the assessment area had a total of 3,123 businesses in 2018, of which 2,799 (89.6%) were small businesses with GAR of $1 million or less.

During the evaluation period, average unemployment rates showed slight improvements, although rates were higher than the States of Maryland and West Virginia.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 19060 (Cumberland, MD-WV)	7.7	7.1	6.2	5.7	5.5
Allegany County, MD	7.6	7.0	6.3	5.9	5.5
Mineral County, WV	7.9	7.3	6.0	5.3	5.5
State of Maryland	5.2	4.4	4.1	4.0	3.6
State of West Virginia	6.6	6.7	6.1	5.2	5.2

Additional performance context data for this assessment area is provided in the subsequent MSA 19060 (Cumberland, MD-WV) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area Cumberland, MD-WV (MSA 19060) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	5,038	21.3
Moderate-income	5	16.7	3,462	14.6	887	25.6	4,315	18.2
Middle-income	20	66.7	15,926	67.3	1,563	9.8	4,761	20.1
Upper-income	5	16.7	4,279	18.1	334	7.8	9,553	40.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**30**	**100.0**	**23,667**	**100.0**	**2,784**	**11.8**	**23,667**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	7,657	3,312	12.8	43.3	3,187	41.6	1,158	15.1
Middle-income	30,274	17,907	69	59.1	7,992	26.4	4,375	14.5
Upper-income	8,407	4,718	18.2	56.1	2,473	29.4	1,216	14.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**46,338**	**25,937**	**100.0**	**56.0**	**13,652**	**29.5**	**6,749**	**14.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	448	14.3	399	14.3	43	16.7	6	9.1
Middle-income	1,994	63.8	1,785	63.8	162	62.8	47	71.2
Upper-income	681	21.8	615	22	53	20.5	13	19.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**3,123**	**100.0**	**2,799**	**100.0**	**258**	**100.0**	**66**	**100.0**
	Percentage of Total Businesses:			**89.6**		**8.3**		**2.1**

Based on 2018 FFIEC Census Data and 2018 D&B information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 19060 (CUMBERLAND, MD-WV)

LENDING TEST

M&T's performance under the lending test in MSA 19060 (Cumberland, MD-WV) was rated Low Satisfactory. This conclusion was based on the fact that the bank's lending levels reflected adequate responsiveness to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made an adequate level of community development loans.

Greater weight was given to the analysis of small business loans in the analysis for geographic and borrower distribution, as small business lending accounted for the majority of lending activity within this assessment area. Multifamily lending was only considered in the evaluation of

community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MSA 19060 (Cumberland, MD-WV). This conclusion is based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA and small business-related lending were considered adequate. Annualized, total HMDA and small business volume for the evaluation period decreased 10.8% compared to the previous evaluation period. For the five-year evaluation period, lending activity totaled 671 loans consisting of 96 home purchase, 96 refinance, 139 home improvement and 340 small business loans. Lending activity declined on an annualized basis compared to the prior two-year period, during which lending activity totaled 301 loans consisting of 26 home purchase, 100 refinance, 62 home improvement, and 113 small business loans. The decrease was driven by decreases in refinance (-61.6%) and home improvement (-10.3%) lending. Increases were noted in home purchase (47.7%) small business (20.4%) lending. The aggregate lending for the evaluation period indicated a decrease in aggregate lending volume.

M&T's market share of deposits in the assessment area was generally stable while lending market share increased over the review period. In 2018, M&T had a deposit market share of 22.3%, and lending market shares of 0.9% in home purchase lending, 2.7% in refinance, 9.3% in home improvement and 7.5% in small business lending. In comparison, at the beginning of the review period in 2014, the deposit market share was 23.5%, with lending market shares of approximately 2.2% in home purchase lending, 1.6% in refinance lending, 11.5% in home improvement lending, and 6.4% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of loans reflected good penetration throughout the bank's the multistate MSA 19060 (Cumberland-MD-WV) assessment area. This conclusion was based on M&T's performance in moderate-income census tracts, as there were no low-income census tracts in the assessment area during the review period. Lending penetration in moderate-income census tracts was adequate for home purchase and refinance loans, while home improvement lending penetration in moderate-income census tracts was good. Small business lending penetration was excellent.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 100.0% of all census tracts in the AA when considering HMDA and small business lending. In 2018, the bank penetrated 100% of moderate-income tracts in the assessment area considering HMDA and small business lending. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending

was lower, as the bank penetrated 86.7% of all census tracts in 2017, 90.0% in 2016, 90.0% in 2015 and 93.3% in 2014.

MSA 19060 (Cumberland-MD-WV)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	0	0	0.0%
Moderate	5	0	100.0%
Middle	20	0	100.0%
Upper	5	0	100.0%
Unknown	0	0	0.0%
Total Tracts	30	0	100.0%
2017			
Low	0	0	0.0%
Moderate	5	1	80.0%
Middle	20	2	90.0%
Upper	5	1	80.0%
Unknown	0	0	0.0%
Total Tracts	30	4	86.7%
2016			
Low	0	0	0.0%
Moderate	5	0	100.0%
Middle	21	2	90.5%
Upper	4	1	75.0%
Unknown	0	0	0.0%
Total Tracts	30	3	90.0%
2015			
Low	0	0	0.0%
Moderate	5	0	100.0%
Middle	21	3	85.7%
Upper	4	0	100.0%
Unknown	0	0	0.0%
Total Tracts	30	3	90.0%
2014			
Low	0	0	0.0%

Moderate	5	1	80.0%
Middle	21	1	95.2%
Upper	4	0	100.0%
Unknown	0	0	0.0%
Total Tracts	30	2	93.3%

Home Purchase

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 7.7% by number and 4.8% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts, by number, was below the 12.8% of owner-occupied housing units located in moderate-income census tracts and was also below the aggregate, which made 12.6% by number and 10.3% by dollar in moderate-income census tracts. Home purchase lending in moderate-income census tracts in 2014-2017 was consistent with 2018's performance as performance in 2014, 2016, and 2017 was below the demographic and aggregate while in 2015 home purchase lending in moderate-income census tracts exceeded the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 8.2% by number and 9.5% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts by number was below the 12.8% of owner-occupied housing units located in moderate-income census tracts; however, performance exceeded the aggregate, which made 6.6% by number and 5.6% by dollar in moderate-income census tracts.

The bank's refinance lending in moderate-income census tracts for 2014-2017 was below the demographic and the aggregate in 2014 and 2017 while performance for 2015 and 2016 was comparable to the demographic and exceeded the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made 9.1% by number and 6.1% by dollar of home improvement loans in moderate-income census tracts. Performance in home improvement lending in moderate-income census tracts, by number, was below the 12.8% of owner-occupied housing units located in moderate-income census tracts. Performance exceeded the aggregate, which made 7.0% by number and 4.8% by dollar in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts for 2014 and 2017 exceeded both the demographic and aggregate while performance in 2015 and 2016 was comparable to the demographic and exceeded the aggregate.

Small Business

The geographic distribution of small business loans reflected excellent penetration throughout the assessment area, as in three of the five years during the review period, M&T's small business lending exceeded both the demographic and the aggregate (2015-2017). In 2018, the bank made 6.3% by number and 1.4% by dollar of small business loans in moderate-income census tracts. Small business lending performance by number was below the demographic of the assessment area where 14.3% of businesses were located in moderate-income census tracts. Small business lending in moderate-income census tracts was also below the aggregate, which made 11.2% by number and 11.0% by dollar in moderate-income census tracts.

Small business penetration for 2015-2017 exceeded 2018's performance as small business lending in 2015-2017 exceeded the demographic and the aggregate. Performance for 2014 was below the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

M&T's distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 19060 (Cumberland, MD-WV) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of $1 million or less was good.

Home Purchase

M&T's distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes for home purchase loans. The bank did not originate any home purchase loans in 2018 to low-income borrowers, compared to the aggregate data lending, at 8.5% by number and 4.7% by dollar and the 21.3% of low-income families in the assessment area. However, the bank's lending to moderate-income borrowers, at 46.2% by number and 40.4% by dollar, significantly exceeded both the aggregate lending data at 18.2% by number and 13.4% by dollar and the 18.2% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. While 2015-2017 lending to low-income borrowers was below the demographic figure, performance was above the aggregate data lending. The bank's 2014 lending was below the aggregate lending and significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was slightly below the 2018 performance. The bank's lending in 2017 was consistent with 2018 performance, significantly exceeding both the aggregate and demographic figure. Lending in 2016 and 2015 to moderate income borrowers was below both

the aggregate lending data and the demographic figure, while 2014 lending was comparable to both the aggregate data, and demographic figure.

Refinance

M&T's distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income for refinance loans. The bank's 2018 lending to low-income borrowers was 10.2% by number and 5.4% by dollar, which was consistent with the aggregate lending data of 9.6% by number and 6.1% by dollar; however, performance was significantly below the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 16.3% by number and 10.8% by dollar, was comparable to both the aggregate lending data of 16.5% by number and 11.7% by dollar, as well as the demographic figure of 18.2%.

M&T's lending in 2014-2017 was below its 2018 performance. In 2015 and 2017, the bank did not make any refinance loans to low-income borrowers, while 2016 performance was comparable to aggregate lending and 2014 performance exceeded aggregate lending. Consistent with 2018 lending, 2014-2017 lending to low-income borrowers was below the demographic figure. In 2017, the bank's lending to moderate-income borrowers exceeded both the aggregate lending and demographic figure. In 2016 and 2014, performance fell below aggregate lending and the demographic figure. In 2015, performance was comparable to aggregate lending and below the demographic figure.

Home Improvement

M&T's distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home improvement loans based on consistent good performance in 2014-2017 lending. In 2018, the bank did not originate any home improvement loans to borrowers of low-income, which was significantly below aggregate lending data of 5.4% by number and 1.6% by dollar and the 21.3% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 22.7% by number and 18.4% by dollar, was slightly above both the aggregate lending data at 18.6% by number and 10.8% by dollar, and the demographic figure at 18.2%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending in 2017, while significantly exceeding in 2014-2016. Compared to the demographic figure, 2017 performance fell below, while 2014-2016 performance was more favorable. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending was above the aggregate lending data, and comparable to the demographic figure.

Small Business

M&T's distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes. In 2018, the bank originated 62.5% of loans by number and 33.4% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending significantly exceeded aggregate lending data at 43.2% by number and 29.6% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 89.6%. While the bank's loan volume was significantly below the demographic figure, the bank originated 76.0% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. The bank's lending significantly exceeded aggregate lending data and significantly fell below the demographic figure. Additionally, the bank originated the majority of their loans in amounts of $100,000 or less.

Community Development Lending

As shown in the table, M&T made an adequate level of community development lending in multistate MSA 19060 (Cumberland, MD-WV) with one community development loan for $500,000, which accounted for all the bank's community development lending in the assessment area. M&T ranked fifth out of five similarly-situated banks when comparing annualized community development loans to deposits within the MSA 19060 (Cumberland, MD-WV) assessment area. Community development lending was responsive to identified needs within MSA 19060 (Cumberland, MD-WV).

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Economic Development	1	500
Total	**1**	**$500**

The one community development loan supported a CDFI loan pool, which enabled member CDFIs to support economic development in the Appalachian Region.

INVESTMENT TEST

M&T's performance in MSA 19060 (Cumberland, MD-WV) under the investment test is rated Low Satisfactory. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and the exhibited adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made one qualified investment for $6.6 million; there were no prior period investments. By comparison the bank made three qualified investments totaling $3.1 million at the last evaluation. M&T ranked 2nd of five similarly-situated banks when

comparing annualized community development investments to deposits within the MSA 19060 (Cumberland, MD-WV) assessment area.

The new investment benefited the assessment area by supporting affordable housing needs through use of a LIHTC to acquire and rehabilitate 69 units of affordable senior housing. Thirty-two units are for very low-income seniors at 30% of Area Median Income ("AMI"), 20 units at 50% of AMI, 7 units at 50% AMI and 10 units at 80% AMI.

The bank did not make any qualified grants or donations within this assessment area.

SERVICE TEST

M&T's performance under the service test in MSA 19060 (Cumberland, MD-WV) is rated Low Satisfactory based on delivery systems that were accessible to the bank's geographies and individuals of different income levels in its assessment area, the record of opening and closing branches did not adversely affect accessibility of its delivery systems particularly in LMI geographies and/or LMI individuals, and services did not vary in a way that inconvenienced the needs of its assessment area particularly LMI geographies and/or LMI individuals. M&T also provided an adequate level of community development services.

Retail Services

M&T's delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area. M&T operated seven branches in this assessment area, one (14.2%) of which was in a moderate-income area. This compares generally to 16.0% of the MSA's population residing in moderate-income areas. This assessment area did not contain any low-income census tracts. M&T did not have any off-site ATM locations in the assessment area.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

Hours and services did not vary in a way that inconvenienced the needs of its assessment area, particularly LMI geographies and/or LMI individuals. Of the seven branches located in the MSA, six (85.7%) had Saturday hours, including the only branch located in a moderate-income tract.

Community Development Services

M&T provided an adequate level of community development services in the assessment area. The bank conducted a total of 30 community development service activities, the majority of which consisted of financial education seminars in the MSA 19060 (Cumberland, MD-WV) assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education Seminars	22
Small Business	0
Technical Assistance	0
Board Participation	8
Total	**30**

MULTISTATE METROPOLITAN AREA

CRA RATING FOR* MSA 35620 (NEW YORK-NEWARK-JERSEY CITY, NY-NJ-PA)[3]*: OUTSTANDING

The Lending test is rated: Outstanding

The Investment test is rated: Outstanding

The Service test is rated: Outstanding

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected excellent responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected excellent penetration throughout the bank's assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- Exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- Made an excellent level of qualified community development investments and grants particularly those not routinely provided by investors, often in a leadership position.
- Made extensive use of innovative and/or complex investments to support community development initiatives.
- Exhibited excellent responsiveness to credit and community development needs.

[3] This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of the state contained within the multistate metropolitan area.

Service Test:

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced its assessment area, particularly LMI geographies and/or LMI individuals.
- A leader in providing community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted of M&T's performance in MSA 35620 (New York-Jersey City-Newark, NY-NJ-PA), based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I, activities in this multistate MSA 35620 (New York-Jersey City-Newark, NY-NJ-PA) made up 17.4% of the bank's deposits, 20.3% of branches, and 15.4% of the bank's HMDA-related and small business loans.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 35620 (NEW YORK-NEWARK-JERSEY CITY, NY-NJ-PA)

As of December 31, 2018, M&T operated 152 branches, or 20.3%, of the bank's branches in MSA 35620 (New York-Jersey City-Newark, NY-NJ-PA). The area is a highly competitive market, and some of the largest financial institutions in the United States have their headquarters in this assessment area. With a deposit market share of less than 1.0%, M&T ranked 19th in deposit market share in this MSA assessment area.

Community Contacts

To learn more about community credit needs, examiners conducted interviews and received comments from four not-for-profit agencies. One organization contacted had the mission to secure and preserve affordable housing and develop individuals' leadership skills to transform lives and the community. The organization offered career and education programs, community development, housing counseling, community organizing, college success programs, and childcare programs. It actively promoted policies that advance racial equity. The contact indicated specific needs that were not being met by banks, which include homeownership preservation and the need for better small business lending, particularly in small dollar loans. The contact also stated that while banks were active with the Payment Protection Program (PPP) loans in the community, they were lending to more established businesses so the "mom and pop" businesses did not get access to the funding they needed.

A second contact was with an organization with a mission to promote and preserve affordable and equitable homeownership in New York City ("NYC"). The contact indicated that the need for affordable housing is significant in NYC. The organization has found that in recent years they have prepared potential homeowners to buy homes outside of the city and the state because of the lack of affordability in NYC. The contact noted a need for more affordable housing units need to be built in the NYC market.

A third contact was conducted with a local community development corporation serving the Brooklyn, NY community. The organization offers home ownership programs, affordable housing programs, and serves as a catalyst for economic development. In addition, it creates alliances with elected officials, local business groups, and individual businesses to revitalize neighborhoods, rehabilitate buildings, and work with developers to add to the housing stock with the goal of preserving affordable housing.

The contact noted that when a bank or its centralized underwriting function is located farther from the community, it is harder for the local population to obtain financing. In general, small local banks are the best option for the local population to obtain loans. The contact also indicated that banks are providing less financing to non-profit organizations. Specific needs that are not met by banks include homeownership preservation and small business lending.

The last contact was with an organization that invests in affordable housing for low-income communities. The contact stated that NYC's economy is in a precarious state due to the COVID-19 pandemic because so much of the economy is based on culture and tourism. These industries provide a lot of jobs for the low-income, and minority communities, which are the communities hit hardest by both the health and economic crises caused by the pandemic. The contact stated that there is a need for a concerted effort to think about what credit means for small businesses and to develop programs to meet the needs of the smallest of businesses. The contact felt that a stronger CRA commitment and collaboration efforts from banks is needed to address these problems. The contact also noted there is a need for homeownership preservation. Finally, the contact stated that banks could do more to address community and neighborhood redevelopment.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) included the New York State and New Jersey portions of MD 35614 (New York-Jersey City-White Plains- NY-NJ), MD 20524 (Dutchess-Putnam, NY), MD 35004 (Nassau County-Suffolk County, NY), and MD 35084 (Newark, NJ-PA). According to the 2015 ACS, the population of the assessment area

was 19.8 million, which was an increase of 400,000 from the 19.4 million reported for the 2010 census. Approximately 34.9% of the assessment area population resided in LMI geographies. Of the MSA's 4,641 total census tracts in 2018, 554 or 11.9% were low-income tracts and 1,008 or 21.7% were moderate-income tracts, 1,460 or 31.5% were middle-income, 1,525 or 32.9% were upper-income, and 94 or 2.0% were of unknown-income. The LMI geographies were concentrated in upper Manhattan, northern Brooklyn, southern Bronx County, and Essex County, NJ.

New York City is a very diverse area, resulting from the city historically serving as a primary point of entry into the U.S. for immigrants. The 2015 ACS reports the number of foreign-born people residing in New York City in 2009-2013 at slightly above three million or 37.0% of the area's total population. About 40% of New York City's three million households were non-family households, which tend to have lower incomes.

Income Characteristics

The 2015 ACS estimated that MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) had 4,663,259 families, of which 25.1% (11.3% of which were below the poverty level) were considered low-income and 15.5% were moderate-income. The FFIEC median family income for the MSA 35620 (New York-Newark-Jersey City. NY-NJ-PA) was $80,190 in 2015, an increase of 4.6% over the $76,635 reported for 2010.

The FFIEC median family incomes for the MSA and its Metropolitan Divisions were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$76,635	$80,190
MD 20524 (Dutchess-Putnam Counties, NY)	$86,488	$94,443
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	$68,006	$72,047
MD 35004 (Nassau-Suffolk Counties, NY)	$101,543	$108,193
MD 35084 (Newark, NJ-PA)	$90,123	$95,579
State of New York	$67,405	$71,913
State of New Jersey	$84,904	$88,335

Housing Characteristics

In 2018, the assessment area contained 7.7 million housing units, of which 46.6% or 3.6 million were owner-occupied, according to the 2015 ACS. Of the available owner-occupied housing units,

2.8% and 13.1% were in low- and moderate-income census tracts, respectively. According to 2015 ACS information, the median housing value in MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) in 2017 and 2018 was $402,077 with an affordability ratio of 16.7. The median gross rent in the assessment area was $1,263 per month. Within the assessment area, 51.4% of all renters had rental costs that exceeded 30% of their incomes. Higher housing values are found in the suburban areas of the Westchester and Nassau Counties and in Manhattan (New York County).

In the New York City portion of the MSA, housing was expensive relative to income levels, causing significant affordability issues for LMI population. Most families throughout the assessment area, particularly LMI families, could not afford to own a home because of the sharp disparity between incomes and housing costs, indicating the need to provide affordable mortgage programs and develop affordable rental properties for LMI residents. The table below presents housing characteristics from the 2010 Census and the 2015 ACS for the assessment area and the State of New York.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$444,337	14.3	$402,077	16.7	$1,108	$1,263	14.0%
MD 20524 (Dutchess-Putnam Counties, NY)	$346,139	21.4	$293,968	26.4	$1,059	$1,146	8.2%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	$447,924	13.0	$413,786	14.9	$1,097	$1,261	14.9%
MD 35004 (Nassau-Suffolk Counities, NY)	$457,037	19.4	$406,895	22.9	$1,418	$1,559	9.9%
MD 35084 (Newark, NJ)	$408,682	18.3	$365,562	21.0	$1,073	$1,167	8.8%
State of New York	$303,900	18.3	$283,400	20.9	$977	$1,132	15.9%
State of New Jersey	$357,000	19.6	$315,900	22.8	$1,092	$1,192	9.2%

Labor, Employment and Economic Characteristics

According to D&B data, the assessment area had a total of 989,080 businesses in 2018, of which 892,707, or 90.2%, were small businesses with GAR of $1 million or less. New York City is a global hub of international businesses and commerce. The city is a major center for finance, insurance, real estate, and the arts in the United States. New York City is also unique among American cities for its large number of foreign corporations.

During the evaluation period, average annual unemployment rates showed slight improvements across the assessment area. The largest improvements were in MD 35614 (New York-Jersey City-White Plains, NY-NJ) and MD 35084 (Newark, NJ-PA).

U.S. Department of Labor **Annual Unemployment Rates**					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MD 20524 (Dutchess-Putnam Counties, NY)	5.2	4.4	4.1	4.3	3.7
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	6.8	5.5	4.9	4.5	4.1
MD 35004 (Nassau-Suffolk Counties, NY)	5.1	4.5	4.1	4.3	3.7
MD 35084 (Newark, NJ-PA)	6.5	5.6	4.9	4.6	4.1
State of New York	6.3	5.3	4.9	4.7	4.2
State of New Jersey	6.8	5.8	5.0	4.6	4.1

Additional performance context data for this assessment area is provided in the subsequent MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: NY-Newark-Jersey City, NY-NJ-PA (MSA 35620) 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	554	11.9	549,273	11.8	190,185	34.6	1,168,821	25.1
Moderate-income	1,008	21.7	960,757	20.6	171,847	17.9	721,812	15.5
Middle-income	1,460	31.5	1,451,697	31.1	106,183	7.3	803,267	17.2
Upper-income	1,525	32.9	1,697,845	36.4	58,350	3.4	1,969,359	42.2
Unknown-income	94	2	3,687	0.1	571	15.5	0	0
Total Assessment Area	**4,641**	**100.0**	**4,663,259**	**100.0**	**527,136**	**11.3**	**4,663,259**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	920,744	101,467	2.8	11	735,712	79.9	83,565	9.1
Moderate-income	1,634,118	472,142	13.1	28.9	1,007,264	61.6	154,712	9.5
Middle-income	2,336,430	1,293,840	35.8	55.4	836,733	35.8	205,857	8.8
Upper-income	2,849,766	1,746,067	48.3	61.3	842,649	29.6	261,050	9.2
Unknown-income	11,850	2,681	0.1	22.6	7,631	64.4	1,538	13
Total Assessment Area	**7,752,908**	**3,616,197**	**100.0**	**46.6**	**3,429,989**	**44.2**	**706,722**	**9.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	68,764	7	63,289	7.1	4,976	5.6	499	5.7
Moderate-income	152,321	15.4	139,977	15.7	11,151	12.6	1,193	13.7
Middle-income	282,303	28.5	258,133	28.9	22,016	24.8	2,154	24.8
Upper-income	474,157	47.9	421,889	47.3	47,538	53.6	4,730	54.4
Unknown-income	11,535	1.2	8,419	0.9	3,003	3.4	113	1.3
Total Assessment Area	**989,080**	**100.0**	**891,707**	**100.0**	**88,684**	**100.0**	**8,689**	**100.0**
	Percentage of Total Businesses:			**90.2**		**9.0**		**0.9**

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN MSA 35620 (NEW YORK-NEWARK-JERSEY CITY, NY-NJ-PA)

LENDING TEST

M&T's performance under the lending test in MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) is Outstanding. This performance is based on the fact that the bank's lending levels reflected excellent responsiveness to the assessment area credit needs, geographic distribution of loans reflected excellent penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes, and the bank made an adequate level of community development loans.

Greater weight was given to the analysis of home purchase and small business lending performance followed by refinance and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

Lending Activity

M&T's lending levels reflected excellent responsiveness to the assessment area credit needs in MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA). This conclusion is based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered excellent while small business lending also was excellent. For the five-year evaluation period, lending activity totaled 21,414 loans consisting of 9,993 home purchase, 3,709 refinance, 1,140 home improvement and 6,572 small business loans. Lending activity increased on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 4,940 loans consisting of 2,261 home purchase, 1,396 refinance, 149 home improvement, and 1,134 small business loans. HMDA and small business volume for the evaluation period increased 73.4% compared to the previous evaluation period. This increase was driven primarily by increases in home purchase (76.8%), refinance (6.3%), home improvement (206.0%) and small business (131.8%) loan volumes. Aggregate lending showed annualized increases in lending activity, as well.

M&T's market share of deposits was stable, while lending market share increased. In 2018, M&T had a deposit market share of 0.9%, and lending market shares of 0.8% in both home purchase and refinance lending, 2.4% in home improvement and 0.3% in small business lending. In comparison, at the beginning of the review period in 2014, the deposit market share was 0.5%, with lending market shares of 1.2% in home purchase lending and less than 1.0% in refinance, home improvement and small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected excellent penetration throughout multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA). Lending penetration in LMI census tracts was excellent for home purchase, refinance, and home improvement lending for 2018. Small business penetration in LMI census tracts was adequate.

Analysis of Lending Gaps

In 2018, M&T originated HMDA and small business loans in 46.0% of all census tracts in the assessment area, while low-income census tracts had a greater percentage of tracts without loans. In 2018, the bank penetrated 27.6% of low-income census tracts when evaluating HMDA and small business lending. Penetration in moderate-income census tracts was better at 37.8% of all moderate-income census tracts. Overall, penetration of different income tracts from 2014 through 2017 for HMDA and small business lending was slightly better as the bank penetrated 43.6% of all census tracts in 2017, 45.1% in 2016, 41.7% in 2015 and 38.5% in 2014. The table below details the bank's penetration of low, moderate-, middle-, and upper-income census tracts.

MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	554	401	27.6%
Moderate	1,008	627	37.8%
Middle	1,460	731	49.9%
Upper	1,525	658	56.9%
Unknown	94	90	4.3%
Total Tracts	4,641	2,507	46.0%
2017			
Low	554	387	30.1%
Moderate	1,008	618	38.7%
Middle	1,460	741	49.2%
Upper	1,525	784	48.6%
Unknown	94	87	7.4%
Total Tracts	4,641	2,617	43.6%
2016			
Low	504	405	19.6%
Moderate	1,036	660	36.3%
Middle	1,481	704	52.5%
Upper	1,531	693	54.7%
Unknown	90	87	3.3%
Total Tracts	4,642	2,549	45.1%
2015			
Low	504	393	22.0%
Moderate	1,036	676	34.7%
Middle	1,481	789	46.7%
Upper	1,531	765	50.0%
Unknown	90	85	5.6%
Total Tracts	4,642	2,708	41.7%
2014			
Low	504	421	16.5%
Moderate	1,036	716	30.9%
Middle	1,481	849	42.7%
Upper	1,531	785	48.7%

Unknown	90	86	4.4%
Total Tracts	4,642	2,857	38.5%

Home Purchase

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 9.0% by number and 8.8% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts, by number, exceeded the 2.8% of owner-occupied housing units located in low-income census tracts and also exceeded the aggregate, which made 4.1% by number and 3.4% by dollar in low-income census tracts. In 2018, the bank made 23.1% by number and 19.8% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts, by number, exceeded the 13.1% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate, which made 14.3% by number and 12.2% by dollar in moderate-income census tracts.

In 2014-2017, home purchase performance was consistent with 2018's performance, as the bank exceeded the demographic and the aggregate in both low- and moderate-income census tracts in all years.

Refinance

The geographic distribution of refinance loans reflected excellent penetration throughout the assessment area in both low- and moderate-income census tracts due to multiple years, prior to 2018, of exceeding both the demographic and the aggregate. In 2018, the bank made 2.1% by number and 2.1% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts by number and dollar was below the 2.8% of owner-occupied housing units located in low-income census tracts. Additionally, M&T's refinance lending in low-income census tracts was below the aggregate, which made 3.7% by number and 3.8% by dollar in low-income census tracts. In 2018, the bank made 11.0% by number and 10.1% by dollar volume of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts by number and dollar was slightly below the 13.1% of owner-occupied housing units located in moderate-income census tracts. M&T's refinance lending in moderate-income census tracts was also slightly below the aggregate, which made 12.7% by number and 12.0% by dollar amount volume in moderate-income census tracts

In 2014-2017, the bank's refinance lending exceeded 2018's performance. In low-income census tracts for 2014-2017, performance exceeded both the demographic and the aggregate. In moderate-income census tracts for 2014, 2015 and 2017 refinance performance exceeded the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts for 2016 was comparable to the demographic and exceeded the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected excellent penetration throughout the assessment areas in both low- and moderate-income census tracts. In 2018, the bank made 2.2% by number and 1.4% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending in low-income census tracts by number and dollar volume was slightly below the 2.8% of owner-occupied housing units located in low-income census tracts. Additionally, M&T's home improvement lending in low-income census tracts was comparable to the aggregate, which made 2.1% by number and 2.9% by dollar in low-income census tracts. In 2018, the bank made 12.8% by number and 9.0% by dollar volume of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts, by number, was slightly below the 13.1% of owner-occupied housing units located in moderate-income census tracts but exceeded the aggregate, which made 9.3% by number and 9.7% by dollar in moderate-income census tracts.

The bank's home improvement lending in 2014-2017 exceeded 2018 performance. In low-income census tracts in 2014, 2016 and 2017, home improvement lending exceeded the demographic and the aggregate. However, the bank's home improvement lending in low-income census tracts in 2015 was below the demographic and the aggregate. Yet, in moderate-income census tracts in 2014, 2015 and 2017, home improvement performance exceeded the demographic and the aggregate. The bank's home improvement lending in moderate-income census tracts for 2016 was slightly below the demographic and comparable to the aggregate.

Small Business

The geographic distribution of small business loans reflected adequate penetration. In 2018, the bank made 4.5% by number and 2.7% by dollar of small business loans in low-income census tracts. The bank's small business lending in low-income census tracts, by number and dollar, was slightly below the demographics of the assessment area where 7.0% of businesses were in low-income census tracts. Performance was also below the aggregate, which made 7.3% by number and 6.9% by dollar a in low-income census tracts. In 2018, the bank made 14.4% by number and 11.7% by dollar volume of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income tracts was slightly below the demographic of the assessment area where 15.4% of businesses were in moderate-income census tracts. Additionally, M&T's small business lending in moderate-income census tracts was slightly below the aggregate, which made 16.0% by number and 15.1% by dollar in moderate-income census tracts.

In 2014-2017, M&T's small business lending was below 2018's performance. In both low-and moderate-income census tracts for 2014-2017, performance was slightly below the demographic and the aggregate

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in the MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was good based on good performance of home purchase lending, and adequate performance in refinance and home improvement lending to LMI borrowers. M&T's lending to businesses with gross annual revenues of $1 million or less was adequate.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers was 4.9% by number and 1.7% by dollar, which was comparable to the aggregate lending data of 2.8% by number and 1.4% by dollar. Performance was significantly below the 25.1% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 24.2% by number and 13.7% by dollar significantly exceeded both the aggregate lending data of 13.0% by number and 7.5% by dollar, as well as the 15.5% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers was comparable to the aggregate data lending but was significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2015-2017 was also consistent with 2018 performance. The bank's lending was above both the aggregate lending data and the demographic figure. In 2014, the bank's lending to moderate-income borrowers was comparable to the aggregate lending data and slightly below the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers was 5.8% by number and 3.0% by dollar, which was comparable to the aggregate lending data of 4.6% by number and 2.3% by dollar Performance was significantly below the 25.1% of low-income families in the assessment area The bank made 14.1% by number and 7.5% by dollar to moderate-income borrowers, which was comparable to both the aggregate lending data of 11.8% by number and 6.7% by dollar and the 15.5% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers was comparable to aggregate lending but was significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2015-2017 was slightly below the 2018 performance. For the aforementioned years, the bank's lending was consistent with the aggregate lending data but was below the demographic figure, while in 2014, the bank's lending to the moderate-income borrowers was below both the aggregate lending data and the demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers was 4.9% by number and 1.8% by dollar, which was comparable to aggregate lending data of 3.0% by number and 1.8% by dollar. Performance was significantly below the 25.1% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 13.0% by number and 6.8% by dollar, was above the aggregate lending data, at 9.5% by number and 5.8% by dollar and comparable to the 15.5% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending and was comparable to the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending was above the aggregate lending data and comparable to the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes for small business loans. In 2018, the bank originated 54.5% of loans by number and 27.8% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending significantly exceeded aggregate lending data by number and was comparable by dollar, which made 40.7% by number and 27.8% by dollar to businesses in the assessment area with gross annual revenues of $1 million or less. The bank's performance was significantly below the 90.2% of businesses in the assessment area with gross annual revenues of $1 million or less. While the bank's loan volume was significantly below the demographic figure, the bank originated 66.9% of loans to assessment area businesses in increments of $100,000 or less, which are typically viewed as more responsive to smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was below 2018 lending. While lending in 2016 exceeded aggregate lending, it fell significantly below the demographic figure. Additionally, the bank's lending in 2014, 2015 and 2017 to small businesses was also comparable to aggregate lending yet significantly below the demographic figure.

Community Development Lending

M&T was a leader in making community development loans in multistate MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA). As displayed in the table to the right, the bank made 389 community development loans, totaling $3.2 billion. M&T ranked first out of seven similarly-situated banks when comparing annualized community development loans to deposits within the MSA 35620 (New York-Newark-Jersey City. NY-NJ-PA) assessment area. Community development lending was responsive to identified needs within MSA 35620 (New York-Newark-Jersey City. NY-NJ-PA).

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	82	843,019
Community Services	238	1,353,624
Economic Development	23	75,685
Revitalize and Stabilize	46	888,355
Total	**389**	**$3,160,683**

Performance within the MSA, by dollar, was mostly allocated to community services, revitalization and stabilization and affordable housing initiatives. By dollar, community service initiatives represented 42.8% of community development activities, while revitalization and stabilization represented 28.1%, affordable housing represented 26.7% and economic development represented 2.4% within the MSA.

Examples of community development lending include:

- Three loans totaling $209.7 million for a redevelopment project that included five mixed-use buildings and a supermarket in a low-income tract.
- A $64.8 million loan for the purchase of two skilled nursing facilities providing healthcare services to LMI individuals who receive or are eligible to receive Medicaid.
- A $31.0 million loan to support the construction of a charter school in a low-income tract, serving primarily low- and moderate-income students.
- Two loans totaling $165 million for the purchase and renovation of a multi-family project containing rent stabilized apartments in a moderate-income tract.

INVESTMENT TEST

M&T's performance in the MSA 35620 (New York-Jersey City-Newark, NY, NJ, PA) under the investment test is rated Outstanding. The bank made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, and often in a leadership position. The bank made extensive use of innovative or complex investments to support community development initiatives and exhibited excellent responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 348 qualified investments, consisting of $481.5 million current period investments and $71.0 million prior period investments for an approximate total of $552.6 million. M&T ranked 2nd of seven similarly-situated banks when comparing annualized community development investments to deposits within the MSA 35620 (New York-Jersey City-Newark, NY, NJ, PA).

This is a significant increase by both number and dollar amount from the previous evaluation, even after taking into account the significant difference in the duration of the evaluation periods. During the evaluation period, 88 new affordable housing qualified investments were made.

Several large investments were made, often in a leadership position for large scale affordable housing projects, throughout the assessment area. In addition, M&T made several investments supporting mixed-use retail and housing projects aimed in helping to revitalize and stabilize low- and moderate-income tracts in the assessment area. The bank also made extensive use of mortgage backed securities that benefited the assessment area for approximately $93.2 million, in response to the need for affordable housing.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) - New	88	223,637	0	0	30	158,836	8	99,066	126	481,539
MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)– Prior Period	221	65,180	1	5,904	0	0	0	0	222	71,084
Total	309	288,817	1	5,904	30	158,836	8	99,066	348	552,623

The following are examples of qualified investments that met critical needs in the assessment area:

- Deposits totaling $2.6 million in credit unions and minority-owned financial institutions that provide low-cost financial services to LMI individuals.
- A total of $1.1 million in New Jersey Neighborhood Revitalization Tax Credits that supported various projects including the acquisition and renovation of a derelict property to be a training center that provides educational, job training, and microenterprise development services to neighborhood residents.
- A total of $19.0 million in LIHTC, which supported construction of 121 units. The project is supported by a 15-year housing assistance payment contract providing rental assistance

to 78 units (62% of total). Fifty-two of the units are supported by Section 8 funding and 26 of the units are supported by an annual contributions contract subsidy.

In addition to the qualified investments, the bank made 1,059 grants or donations totaling $10.4 million during the evaluation period, as illustrated in the table below.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

Area	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)	328	3,736,363	428	2,899,303	142	$1,896,739	161	1,915,000	1,059	$10,447,405

SERVICE TEST

M&T's performance under the service test in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA) is rated Outstanding based on the institution being a leader in providing community development services, delivery systems that were accessible to the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations did not adversely affect accessibility of its delivery systems particularly to LMI geographies and individuals, and services that did not vary in a way that inconvenienced the needs of the assessment area particularly LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were accessible to the bank's geographies and individuals of different income levels in this assessment area. M&T operated 152 branches in this assessment area, of which eight (5.3%) were in low-income areas and 23 (15.1%) were in moderate-income areas, compared to 12.8% and 22.0% of the MSA's population residing in low- and moderate-income census tracts respectively. Alternative delivery systems did not enhance the bank's performance in this assessment area. M&T had 144 offsite ATM locations in the assessment area, 22 (15.2%) of which were located in LMI areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed fifteen branches: one in a low- income tract, two in moderate-income tracts, nine in middle-income tracts, and three in upper-income census tracts in this assessment area.

The bank's hours and services did not vary in a way that inconvenienced the assessment area, including LMI geographies and/or LMI individuals. Of the 152 branches in the MSA, 81 or 53.2% have evening hours and 96 branches or 63.1% have Saturday hours. Of the thirty-one branches in

LMI census tracts, 15 branches, or 48.4%, had extended hours and 23 branches, or 74.2%, had Saturday hours.

Community Development Services

M&T was a leader in providing community development services in the MSA during the evaluation period. The table provides details on the level and type of services offered. The majority of services consisted of mortgage education seminars for LMI and first-time homebuyers. In addition, management and staff served on the board of directors for 137 non-profit and community-based organizations in MSA 35620 (New York-Northern New Jersey-Long Island, NY-NJ-PA).

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	2,532
Technical Assistance	14
Small Business Seminars	12
Board Participation	137
Total	**2,695**

MULTISTATE METROPOLITAN AREA

CRA RATING FOR MSA 37980 (PHILADELPHIA-CAMDEN-WILMINGTON, PA-NJ-DE-MD)[4]: OUTSTANDING

The Lending test is rated: High Satisfactory

The Investment test is rated: Outstanding

The Service test is rated: Outstanding

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- Made an excellent level of qualified community development investments and grants, particularly those not routinely provided by investors, often in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.
- Exhibited excellent responsiveness to credit and community development needs.

[4] This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of the state contained within the multistate metropolitan area.

Service Test:

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced its assessment area, particularly LMI geographies and/or LMI individuals.
- A leader in providing community development services.

SCOPE OF EXAMINATION

Examiners conducted a full-scope review of multistate MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I, activities in this multistate MSA made up 5.5% of the bank's deposits, 7.1% of branches, and 5.9% of loans.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 37980 (PHILADELPHIA-CAMDEN-WILMINGTON, PA-NJ-DE-MD)

M&T operated 53 branches in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD), as of December 31, 2018, representing 7.1% of all M&T branches. Based on deposits reported to the Federal Deposit Insurance Corporation ("FDIC") as of June 30, 2018, M&T ranked 12th in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) with $4.9 billion in deposits or 1.0% of the retail deposit market. This assessment area is a competitive marketplace where large regional banks compete. Some of M&T's primary competitors in this assessment area are PNC Bank, Bank of America, N.A., Capital One Bank N.A., and Santander Bank, N.A.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews with two community representatives to provide perspective on the credit needs of the assessment area. The first contact was with a private, non-profit social service organization, which provided a wide range of housing and related social services to homeless and low- to moderate- income families. The contact indicated that several banks have participated in homeownership counseling classes.

A second contact was with a non-profit organization formed to provide equal housing opportunities for people who are traditionally isolated and systematically denied opportunities due to mental, emotional, or physical disabilities. The organization provides access to transportation, teaches financial enhancement skills, and supports efforts within the community to meet the needs of those they serve. The contact noted that affordable housing is difficult to obtain in the assessment area,

especially for people with disabilities. In addition, the contact indicated that once the pandemic-related moratorium on housing evictions is lifted, there will be increased needs for affordable housing options in the assessment area.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) encompasses the City of Philadelphia and parts of southeastern Pennsylvania, southern New Jersey, northern Delaware, and northeastern Maryland. The MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area consisted of MD 37964 (Philadelphia, PA) in its entirety, which includes two Pennsylvania counties (Delaware and Philadelphia), MD 33874 (Montgomery County-Bucks County-Chester County, PA) in its entirety, and a portion of MD 48864 (Wilmington, DE-MD-NJ), which includes New Castle County, Delaware, and Cecil County, Maryland, and the entirety of MD 15804 (Camden, NJ), which includes Burlington, Camden, and Gloucester Counties, New Jersey.

According to the 2015 ACS, the assessment area had a population of approximately 6.0 million. This population is largely concentrated in the City of Philadelphia, which contained 26.0% of assessment area residents. Of the assessment area's 1,452 total census tracts, 100 or 6.9% were low-income tracts, 343 or 23.6% were moderate-income tracts, 550 or 37.9% were middle-income, 439 or 30.2% were upper-income, and 20 or 1.4% were of unknown-income.

Income Characteristics

The MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE) assessment area had 1,429,245 families, of which 22.0% were considered low-income, 17.3% were moderate-income, 20.0% were middle-income, and 40.8% were upper-income. Of the families in the assessment area, 9.2% of were below the poverty level. The FFIEC median family incomes for the MDs comprising the MSA were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$76,749	$80,232
MD 33874 (Montgomery-Bucks-Chester Counties, PA)	$93,770	$99,930
MD 37964 (Philadelphia, PA)	$54,138	$56,411

MD 48864 (Wilmington, DE-MD-NJ)	$76,709	$79,825
MD 15804 (Camden, NJ)	$81,986	$86,402
State of Pennsylvania	$63,364	$72,993
State of New Jersey	$84,904	$88,935
State of Delaware	$69,182	$72,993
State of Maryland	$85,098	$90,089

Housing Characteristics

The assessment area contained 2.4 million housing units, of which 61.7% or 1.5 million were owner-occupied, according to the 2015 ACS. Of the available owner-occupied housing units, 3.6% and 18.1% were in low- and moderate-income census tracts, respectively. According to 2015 ACS information, the median housing value was $237,282 with an affordability ratio of 26.4. The median gross rent in the assessment area was $1,019 per month. Within the assessment area, 50.3% of all renters had rental costs that exceeded 30% of their incomes.

The table below presents housing characteristics from the 2010 Census and the 2015 ACS for the assessment area and the States of Pennsylvania, Delaware, and New Jersey.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$243,941	24.7	$237,282	26.4	$919	$1,019	10.9%
MD 33874 (Montgomery-Bucks-Chester Counties, PA)	$314,567	24.6	$305,163	26.3	$1,031	$1,160	12.5%
MD 37964 (Philadelphia, PA)	$163,037	25.7	$165,981	26.4	$835	$933	11.7%
MD 48864 (Wilmington, DE-MD-NJ)	$248,240	25.2	$237,351	26.9	$943	$1,027	8.9%
MD 15804 (Camden, NJ)	$241,386	28.4	$218,212	32.6	$966	$1,070	10.8%
State of Pennsylvania	$159,300	31.6	$166,000	32.3	$739	$840	13.7%
State of Delaware	$242,300	23.8	$231,500	26.4	$938	$1,018	8.5%
State of New Jersey	$357,000	19.6	$315,900	22.8	$1,092	$1,191	9.1%

Labor, Employment and Economic Characteristics

The MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area's primary industries were education, health services, trade, transportation, and the utilities sectors. The healthcare sector of the economy benefited from the large teaching hospitals in the city, including Thomas Jefferson University Hospital, the University of Pennsylvania Hospital, and Temple University Hospital. The Jefferson Health System and the University of Pennsylvania were the two largest private sector employers in the assessment area. Professional and business services, local government, and tourism and hospitality industries also played an important role in the assessment area's economy.

According to D&B data, the assessment area had a total of 290,607 businesses in 2018, of which 262,974 (90.5%) were small businesses with GAR of $1 million or less.

During the evaluation period, average annual unemployment rates showed slight improvements although rates were highest in the city of Philadelphia as shown in the following table:

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MD 33874 (Montgomery-Bucks-Chester Counties, PA)	4.7	4.2	4.2	3.9	3.4
MD 37964 (Philadelphia, PA)	7.3	6.5	6.2	5.7	5.0
MD 48864 (Wilmington, DE)	5.9	5.1	4.7	4.6	3.9
MD 15804 (Camden, NJ)	7.1	6.0	5.0	4.6	4.2
State of Pennsylvania	4.9	4.7	4.8	4.3	3.8
State of Delaware	4.6	4.2	4.1	3.8	3.1
State of New Jersey	6.8	5.8	5.0	4.6	4.1
State of Maryland	5.2	4.4	4.1	4.0	3.6

Additional performance context data for this assessment area is provided in the subsequent table of MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) Assessment Area Demographics.

Assessment Area Demographics

Assessment Area : Phila-Camden-Wilmington, PA-NJ-DE (MSA 37980) 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	100	6.9	82,575	5.8	31,805	38.5	313,818	22
Moderate-income	343	23.6	295,032	20.6	49,582	16.8	246,741	17.3
Middle-income	550	37.9	578,452	40.5	34,748	6	285,747	20
Upper-income	439	30.2	471,872	33	14,221	3	582,939	40.8
Unknown-income	20	1.4	1,314	0.1	518	39.4	0	0
Total Assessment Area	**1,452**	**100.0**	**1,429,245**	**100.0**	**130,874**	**9.2**	**1,429,245**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	165,229	53,887	3.6	32.6	83,782	50.7	27,560	16.7
Moderate-income	566,483	270,364	18.1	47.7	224,974	39.7	71,145	12.6
Middle-income	937,681	627,683	42.1	66.9	243,672	26	66,326	7.1
Upper-income	743,233	539,441	36.2	72.6	159,208	21.4	44,584	6
Unknown-income	4,127	198	0	4.8	3,431	83.1	498	12.1
Total Assessment Area	**2,416,753**	**1,491,573**	**100.0**	**61.7**	**715,067**	**29.6**	**210,113**	**8.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	11,060	3.8	9,995	3.8	985	3.9	80	3
Moderate-income	50,091	17.2	45,144	17.2	4,478	17.9	469	17.7
Middle-income	114,663	39.5	103,609	39.4	9,984	40	1,070	40.4
Upper-income	113,435	39	103,239	39.3	9,179	36.7	1,017	38.4
Unknown-income	1,358	0.5	987	0.4	361	1.4	10	0.4
Total Assessment Area	**290,607**	**100.0**	**262,974**	**100.0**	**24,987**	**100.0**	**2,646**	**100.0**
	Percentage of Total Businesses:			**90.5**		**8.6**		**0.9**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 37980 (PHILADELPHIA-CAMDEN-WILMINGTON, PA-NJ-DE-MD)

LENDING TEST

M&T's performance under the lending test in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) is rated High Satisfactory. This performance is based on the fact that the bank's lending levels reflected good responsiveness to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment area, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

Greater weight was given to the analysis of small business lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

Lending Activity

M&T's lending levels reflected good responsiveness to the assessment area credit needs in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA and small business-related lending were considered good. For the five-year evaluation period, lending activity totaled 9,010 loans consisting of 2,861 home purchase, 1,834 refinance, 773 home improvement and 3,542 small business loans. Lending activity declined on an annualized basis compared to the prior two-year period, during which lending activity totaled 4,283 loans consisting of 1,216 home purchase, 1,823 refinance, 209 home improvement, and 1,035 small business loans. HMDA and small business volume for the evaluation period declined 16.4% on an annualized basis overall compared to the previous evaluation period. This decrease was driven by decreases in home purchase (-7.3%) and refinance (-60.0%) lending. Annualized increases did occur, however, in home improvement (47.0%) and small business (36.9%) loan volumes. Analysis of aggregate lending for the evaluation period indicated an increase in lending volume for the aggregate overall.

M&T's market share of deposits and lending share in the assessment area was generally stable over the review period. In 2018, M&T had a deposit market share of 1.0%, and lending market shares of 0.4% in home purchase lending, 0.8% in refinance, 2.0% in home improvement and 0.6% in small business lending. In comparison, at the beginning of the review period in 2014, the deposit market share was 0.9%, with a lending market share of 0.8% in home purchase lending, 0.7% in refinance lending, 1.1% in home improvement lending, and 0.7% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the multistate MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) assessment area. Lending penetration in LMI tracts was excellent for home purchase, good for home improvement and small business loans, and adequate for refinance loans.

Analysis of Lending Gaps

In 2018, M&T originated HMDA and small business loans in 47.5% of all census tracts in the assessment area, while low-income census tracts had a greater percentage of tracts without loans. In 2018, the bank penetrated 29.0% of low-income census tracts when evaluating HMDA and small business lending. Penetration in moderate-income census tracts was better at 44.3% of all moderate-income census tracts. Overall, penetration of different income tracts from 2014 through

2017 for HMDA and small business lending was slightly better as the bank penetrated 47.8% of all census tracts in 2017, 53.9% in 2016, 55.7% in 2015 and 53.4% in 2014. The table below details the bank's penetration of low, moderate-, middle-, and upper-income census tracts.

MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	100	71	29.0%
Moderate	343	191	44.3%
Middle	550	277	49.6%
Upper	439	206	53.1%
Unknown	20	18	10.0%
Total Tracts	1,452	763	47.5%
2017			
Low	100	65	35.0%
Moderate	343	175	49.0%
Middle	550	270	50.9%
Upper	439	230	47.6%
Unknown	20	18	10.0%
Total Tracts	1,452	758	47.8%
2016			
Low	104	71	31.7%
Moderate	334	183	45.2%
Middle	561	229	59.2%
Upper	434	168	61.3%
Unknown	19	18	5.3%
Total Tracts	1,452	669	53.9%
2015			
Low	104	65	37.5%
Moderate	334	154	53.9%
Middle	561	230	59.0%
Upper	434	178	59.0%
Unknown	19	16	15.8%
Total Tracts	1,452	643	55.7%
2014			
Low	104	68	34.6%
Moderate	334	160	52.1%
Middle	561	256	54.4%
Upper	434	175	59.7%
Unknown	19	18	5.3%
Total Tracts	1,452	677	53.4%

Home Purchase

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 4.3% by number and 2.3% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income tracts exceeded the 3.6% of owner-occupied housing units located in low-income census tracts by number but was below by dollar. Performance exceeded the aggregate by number and dollar, which made 2.5% by number and 1.5% by dollar in low-income census tracts. In 2018, the bank made 28.9% by number and 19.6% by dollar volume of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income tracts by number and dollar exceeded the 18.1% of owner-occupied housing units located in moderate-income census tracts and also exceeded the aggregate, which made 18.6% by number and 13.8% by dollar in moderate-income census tracts.

Performance in 2014-2017 was comparable to 2018's performance. The bank's home purchase lending in low-income tracts for 2015 and 2017 exceeded the demographic and the aggregate while in 2014 and 2016 was comparable to the demographic and exceeded the aggregate. In moderate-income census tracts, the bank's home purchase lending in for 2014-2017 exceeded both the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 1.7% by number and 0.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending was below, both by number and dollar, the 3.6% of owner-occupied housing units located in low-income census tracts and was also below the aggregate, which made 2.0% by number and 1.2% by dollar in low-income census tracts. In 2018, the bank made 15.8% by number and 8.9% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income tracts by number was below the 18.1% of owner-occupied housing units located in moderate-income census tracts. Performance was also comparable to the aggregate, which made 15.5% by number and 10.9% by dollar in moderate-income census tracts.

The bank's refinance lending performance for 2014-2017 exceeded performance in 2018. In low-income tracts for 2014-2017, performance was generally comparable to the demographic and exceeded the aggregate, while in moderate-income tracts for 2014 and 2017 performance exceeded the demographic and the aggregate. The bank's refinance lending in moderate-income tracts for 2015 and 2016 was generally comparable to the demographic and exceeded the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made 2.2% by number and 1.4% by dollar volume of home

improvement loans in low-income census tracts. The bank's performance, by number and dollar, was slightly below the 3.6% of owner-occupied housing units located in low-income census tracts. M&T's performance was comparable to the aggregate, which made 2.1% by number and 2.9% by dollar in low-income census tracts. In moderate-income tracts in 2018, the bank made 12.8% by number and 9.0% by dollar of home improvement loans. Performance by number and dollar was below the 18.1% of owner-occupied housing units located in moderate-income census tracts but exceeded the aggregate, which made 9.3% by number and 9.7% by dollar in moderate-income census tracts.

The bank's home improvement lending in 2014-2017 was comparable 2018 performance. In low-income census tracts in 2014 and 2015 home improvement lending was comparable to the demographic and exceeded the aggregate. The bank's home improvement lending in low-income census tracts in 2016 was below the demographic and the aggregate and the bank did not make a home improvement loan in a low-income tract in 2017. In moderate-income census tracts, the bank's home improvement lending in 2014-2017 exceeded the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018, the bank made 2.3% by number and 2.0% by dollar volume of small business loans in low-income census tracts. The bank's small business lending in low-income tracts was slightly below the demographics of the assessment area where 3.8% of business were located in low-income census tracts and slightly below the aggregate, which made 3.3% by number and 3.4% by dollar in low-income census tracts. In 2018, the bank made 19.1% by number and 18.9% by dollar volume of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income tracts, by number, was above the demographics of the assessment area where 17.2% of businesses were located. Additionally, M&T's small business lending was above the aggregate, which made 16.2% by number and 17.5% by dollar, in moderate-income census tracts.

Performance in 2014-2017 was comparable to 2018's performance. In low-income tracts for 2014, performance was above the demographic and aggregate. In 2015 and 2016 in low-income tracts, performance was below the demographic and the aggregate. In 2017, in low-income tracts performance was below the demographic and comparable to the aggregate. In moderate-income tracts in 2014-2017, performance exceeded the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD). Overall, HMDA lending to low- and moderate-income borrowers was good based on good performance of home purchase lending and

home improvement, and adequate performance in refinance. M&T's lending to businesses with gross annual revenues of $1 million or less was adequate.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. In 2018, the bank made 16.6% by number and 8.8% by dollar of home purchase loans to low-income borrowers. Performance was slightly below the 22.0% of low-income families in the assessment area and significantly above aggregate lending data of 8.7%, by number and 4.8% by dollar. The bank's lending to moderate-income borrowers, at 26.1% by number and 19.7% by dollar, exceeded both the 17.3% of moderate-income families in the assessment area and the aggregate lending data of 20.5% by number and 15.3% by dollar.

M&T's lending to low-income borrowers for 2015-2017 was consistent with the bank's 2018 lending performance, while 2014 performance was below. In 2015-2017, lending to low-income borrowers exceeded the aggregate data lending but was below the demographic figure. In 2014, the bank's lending to low-income borrowers was below both the aggregate lending data and the demographic figure. The bank's lending to moderate-income borrowers in 2015-2017 was also consistent with 2018 performance, as the bank's lending was above both the aggregate lending data and the demographic figure. However, in 2014 the bank's lending to the moderate-income borrowers, was significantly below both the aggregate lending data and the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. In 2018, the bank made 18.6% by number and 8.6% by dollar to low-income borrowers. Performance was slightly below the 22.0% of low-income families in the assessment area and significantly above aggregate lending data of 9.7% by number and 5.8% by dollar. The bank's lending to moderate-income borrowers, at 21.7% by number and 11.4% by dollar, was slightly above both the 17.3% or moderate-income families in the assessment area and the aggregate lending data of 18.1% by number and 14.0% by dollar.

M&T's lending to low-income borrowers for 2014-2017 was slightly below the bank's 2018 lending performance. Lending to low-income borrowers was comparable to the aggregate data lending but was significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2015-2017 was slightly below the 2018 performance, as the bank's lending was consistent with the aggregate lending data but was below the demographic figure. In 2014, the bank's lending to the moderate-income borrowers was below both the aggregate lending data and the demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home improvement loans. In 2018, the bank made 14.3% by number and 8.9% by dollar of its home improvement loans to low-income borrowers. Performance was slightly below the 22.0% of low-income families in the assessment area but was above aggregate lending data of 8.4% by number and 5.8% by dollar. The bank's lending to moderate-income borrowers, at 22.3% by number and 16.8% by dollar, was above the demographic figure by number but slightly below by dollar. Performance was slightly above the aggregate lending data at 17.4% by number and 13.7% by dollar.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers significantly exceeded the aggregate data lending and was comparable to the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 also exceeded the 2018 performance. The bank's lending in 2014, 2016 and 2017 was significantly above the aggregate lending data and the demographic figure. In 2015, lending to the moderate-income borrowers was slightly above both the aggregate lending data and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, adequate penetration among businesses of different sizes. In 2018, the bank originated 51.6% of loans by number and 25.0% by dollar to businesses with gross annual revenues of $1 million or less. The bank's lending exceeded aggregate lending data at 44.8% by number and was below aggregate lending data by dollar at 32.3%. Performance was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 90.5%. While the bank's loan volume was significantly below the demographic figure, the bank originated 58.9% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was below 2018 lending. The bank's lending in 2016 and 2017 to small businesses was comparable to aggregate lending while significantly below the demographic figure. In 2014 and 2015, the bank's lending was below the aggregate data and significantly below the demographic figure.

Community Development Lending

M&T was a leader in making community development loans in multistate MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) with 89 loans totaling $877 million.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	18	98,673
Community Services	42	415,673
Economic Development	11	13,708
Revitalize and Stabilize	18	349,084
Total	**89**	**$877,138**

M&T ranked first above six similarly-situated banks when comparing annualized community development loans to deposits within the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE) assessment area. Community development lending was responsive to identified needs within MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE)**.**

Lending efforts supported all areas of community development in the MSA, with 47.4% by dollar targeting community services activity and 39.8% provided to revitalization and stabilization initiatives.

Examples of community development lending include:

- A $67.5 million renewal to help support a skilled nursing facility providing healthcare services to LMI individuals who receive or are eligible to receive Medicaid
- Two loans totaling $59.8 million to support the construction of a charter school in a low-income tract, serving primarily low- and moderate-income students.
- Six loans totaling $168.5 million for a state-supported revitalization effort in a moderate-income tract to help attract new businesses and residents through the redevelopment of mixed-use properties.
- A $60.0 million loan for the acquisition of two multi-family buildings in a moderate-income tract with 565 affordable units.

INVESTMENT TEST

M&T's performance in the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) under the investment test is rated Outstanding. The bank made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, and often in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited excellent responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 148 qualified investments, consisting of $105.6 million current period investments and $19.0 million prior period investments for an approximate total of $124.6 million. M&T ranked 1st of seven similarly-situated banks when comparing annualized community development investments to deposits within the MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD).

This is a consistent with the dollar amount of investments at the previous evaluation when annualized. During the evaluation period, 35 new affordable housing qualified investments were made. The bank made extensive use of mortgage backed securities that benefited the assessment area for approximately $33.3 million in response to the need of affordable housing.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE) – New	35	50,587	1	200	1	9,375	2	45,446	39	105,608
MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE) – Prior Period	109	18,963	0	0	0	0	0	0	109	18,963
Total	144	69,550	1	200	1	9,375	2	45,486	148	124,571

The following are examples of qualified investments that met critical needs in the assessment area:

- A $13.9 million investment in LIHTC that supported the acquisition and renovation of 250-units of affordable housing in Camden, New Jersey.
- A $9.4 million investment in a bank qualified tax-exempt bond that funded 35 units of senior housing for seniors earning less than 50% of AMI in Wilmington, Delaware.
- A $4.7 million investments in LIHTC that supported the construction of 36-units of affordable housing reserved for residents earning incomes under 60% of the AMI.
- A $14.7 million investment in an LIHTC fund that supported the acquisition and renovation of 250-units of affordable housing in Camden, New Jersey for LMI residents. A $5.0 million investment in an LIHTC fund that supported the rehabilitation of 470 housing units

qualifying for new 20-year project-based Section 8 subsidies with the majority of units reserved for residents earning incomes of 20%, 50% and 60% AMI levels.

In addition to the qualified investments, the bank made 769 grants or donations totaling $5.3 million during the evaluation period, as illustrated in the table below.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

Area	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE)	117	953,350	572	3,907,800	52	252,600	28	163,500	769	5,277,250

SERVICE TEST

M&T's performance under the service test in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD) is rated Outstanding based on the institution being a leader in providing community development services, delivery systems that were accessible to the bank's geographies and individuals of different income levels, record of opening and closing branches did not adversely affect its delivery systems, particularly to LMI geographies and/or individuals, and services did not vary in a way that inconvenienced its assessment area, particularly LMI geographies and/or individuals.

Retail Services

M&T's delivery systems were accessible to the bank's geographies and individuals of different income levels in this assessment area. M&T operated 53 branches in this assessment area, of which thirteen (24.5%) were in moderate-income areas; none were in low-income areas. This is below the demographics, which indicate 6.7% and 22.4% of the MSA's population reside in low- and moderate-income areas, respectively, but above the moderate-income demographic. Alternative delivery systems did not enhance the bank's performance in the assessment area. M&T had 49 offsite ATM locations in the assessment area, of which two (4.1%) were located in low-income areas and fourteen (28.5%) were located in moderate-income areas.

The bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems. M&T closed one branch during the evaluation period, which was located in a middle-income census tract. During the evaluation period, M&T did not open any new branches in this assessment area.

The bank's hours and services did not vary in a way that inconvenienced the needs of the assessment area, particularly LMI geographies and/or LMI individuals. Of the 53 branches in the MSA, 31 or 58.5% have extended hours and 21 branches or 39.6% had Saturday hours. Of the 13

branches in moderate-income census tracts, eight branches or 61.5% had extended hours and four branches or 30.8% had Saturday hours.

Community Development Services

M&T was a leader in providing community development services in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD). The adjacent table shows the number and type of services provided. The majority of the services consisted of mortgage education seminars for LMI and first-time homebuyers. In addition, management and staff served on the board of directors for 216 nonprofit organizations in MSA 37980 (Philadelphia-Camden-Wilmington, PA-NJ-DE-MD).

Community Development Services	
Purpose	**#**
Financial Education	750
Technical Assistance	16
Small Business Seminars	11
Board Participation	216
Total	**993**

MULTISTATE METROPOLITAN AREA

CRA RATING FOR MSA 41540 (SALISBURY, MD-DE)[5]: SATISFACTORY

The Lending test is rated: Low Satisfactory

The Investment test is rated: High Satisfactory

The Service test is rated: High Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected excellent responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the bank's assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and very small businesses.
- Made an adequate level of community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- Made a significant level of qualified community development investments and grants particularly those not routinely provided by investors, occasionally in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.
- Exhibited adequate responsiveness to credit and community development needs.

[5] This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Service Test:

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches has not adversely impacted the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services were tailored to the conveniences and needs of its assessment area particularly in LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted of M&T's performance in multistate MSA 41540 (Salisbury, MD-DE), based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I, activities in this multistate MSA made up 1.4% of the bank's deposits, 2.5% of branches, and 2.5% of the bank's loans.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 41540 (SALISBURY, MD-DE)

As of December 31, 2018, M&T had 19 branches in MSA 41540 (Salisbury, MD-DE), which represented 1.5% of the bank's overall deposits and 2.5% of branches. With a deposit market share of 1.7%, M&T ranked 3rd out of 24 banks in market share in this MSA assessment area. Area competitors in the market include Discover Bank, PNC Bank, N.A., Branch Banking & Trust Co, The Bank of Delmarva, Fulton Bank, N.A., Bank of America, N.A., and Citizens Bank, N.A.

Community Contacts

As part of the evaluation process, examiners interviewed a contact with an economic development corporation with a primary purpose to promote business development and to assist in identifying credit needs. The contact indicated there is a large number of small businesses in the area and that there is a need for small microloans. In addition, the contact noted a need for financial education and training programs for the area's small businesses. The contact indicated that both regional and local banks are meeting the credit needs of the community and that financial institutions are very involved in the community.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area consisted of a portion of MSA 41540 (Salisbury, MD-DE), comprised of Sussex County, DE, Wicomico County, MD and Worcester County, MD. In 2018, the assessment area population totaled 360,003.

Based on the 2015 ACS, of the 90 census tracts in the assessment area, there were no low-income census tracts, 11 or 12.2% were moderate-income, 51 or 56.7% were middle-income, 25 or 27.8% were upper-income and three or 3.3% were of unknown income. According to the 2010 Census, there was one low-income census tract in the assessment area.

Income Characteristics

In 2018, the MSA 41540 (Salisbury, MD-DE) assessment area had 93,212 families, of which 20.3% were considered low-income (9.3% were below the poverty level), 17.8% were moderate-income, 20.8% were middle-income, 41.0% and were upper-income. The FFIEC median incomes for the counties comprising the assessment area as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$61,053	$63,662
Sussex County, DE	$59.053	$63,311
Wicomico County, MD	$62,150	$63,231
Worchester County, MD	$67,408	$68,558
State of Delaware	$69,182	$72,993
State of Maryland	$85,098	$90,089

Housing Characteristics

In 2018, the MSA 41540 (Salisbury, MD-DE) assessment area had 225,114 housing units, of which 45.2% were owner-occupied and 16.6% were rental units. Of the total available owner-occupied units, 7.7% were in moderate-income census tracts. In moderate-income census tracts, 62.8% of the housing units were either rental or vacant, and 37.2% were owner-occupied.

In 2018, the median age of housing stock in the assessment area was 34 years old, with 9.0% of the stock built before 1950. The median age of housing stock was 44 years in moderate-income tracts. In 2018, the median housing value in the assessment area was $214,855, with an affordability ratio of 25.1. The median gross rent in the assessment area was $981 per month. Within the assessment area, 46.5% of all renters had rental costs that exceeded 30% of their incomes. The table below presents housing characteristics from the 2010 Census and the 2015 ACS for the assessment area and the States of Maryland and Delaware.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$236,348	21.8	$214,855	25.1	$902	$981	8.1%
Sussex County, DE	$243,700	21.0	$228,500	23.5	$896	$974	8.7%
Wicomico County, MD	$195,100	26.0	$172,400	30.3	$936	$994	6.2%
Worchester County, MD	$289,100	19.2	$243,100	23.4	$808	$963	19.2%
State of Delaware	$242,300	23.8	$231,500	26.1	$938	$1,018	8.5%
State of Maryland	$329,400	21.4	$286,900	26.0	$1,091	$1,230	12.7%

Labor, Employment and Economic Characteristics

Wicomico County was the number one agricultural producing county in Maryland and ranked fourth in broiler chicken production. In addition to agriculture and poultry, health care, educational sectors, and a diverse industrial base offered stability and a firm foundation for Wicomico's economy. Major employers were Chesapeake Shipbuilding, Delmarva Power, Jubilant Cadista Pharmaceuticals, K&L Microwave, Peninsula Regional Medical Center, Perdue Farms, Salisbury University and Tishcon. Wicomico County has a 5,223-acre State Enterprise Zone in Salisbury and a 129-acre Enterprise Zone in Fruitland. Worcester County is the easternmost county in Maryland, with tourism as its major industry. Sussex County has numerous resorts, small towns, industry, and agriculture. Along the coast, tourism is a key industry.

According to D&B data, the assessment area had a total of 19,036 businesses in 2018, of which 17,566 (92.3%) were small businesses with GAR of $1 million or less.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 41540 (Salisbury, MD-DE)	7.1	6.4	5.8	5.6	5.0
Sussex County, DE	5.8	5.0	4.5	4.5	3.8

Wicomico, County. MD	7.8	6.8	6.3	5.9	5.4
Worchester County, MD	11.6	10.6	9.3	8.8	8.2
State of Delaware	5.7	4.9	4.5	4.5	3.1
State of Maryland	5.2	4.4	4.1	4.0	3.6

Additional performance context data for this assessment area is provided in the subsequent MSA 45060 (Salisbury, MD-DE) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area(s) : Salisbury, MD (MSA 41540) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	18,937	20.3
Moderate-income	11	12.2	11,335	12.2	2,230	19.7	16,607	17.8
Middle-income	51	56.7	59,052	63.4	5,240	8.9	19,407	20.8
Upper-income	25	27.8	22,825	24.5	1,155	5.1	38,261	41
Unknown-income	3	3.3	0	0	0	0	0	0
Total Assessment Area	**90**	**100.0**	**93,212**	**100.0**	**8,625**	**9.3**	**93,212**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	21,022	7,828	7.7	37.2	10,065	47.9	3,129	14.9
Middle-income	128,877	66,920	65.8	51.9	20,968	16.3	40,989	31.8
Upper-income	75,215	26,935	26.5	35.8	6,229	8.3	42,051	55.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**225,114**	**101,683**	**100.0**	**45.2**	**37,262**	**16.6**	**86,169**	**38.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,953	10.3	1,746	9.9	177	13.9	30	14.9
Middle-income	12,009	63.1	11,062	63	822	64.8	125	62.2
Upper-income	5,074	26.7	4,758	27.1	270	21.3	46	22.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**19,036**	**100.0**	**17,566**	**100.0**	**1,269**	**100.0**	**201**	**100.0**
	Percentage of Total Businesses:			**92.3**		**6.7**		**1.1**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 45060 (SALISBURY, MD-DE)

LENDING TEST

M&T's performance under the lending test in MSA 45060 (Salisbury, MD-DE) is rated Low Satisfactory. This performance is based on the fact that the bank's lending levels reflected excellent responsiveness to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes, and the bank made an adequate level of community development loans.

Greater weight was given to the analysis of small business loans in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

Lending Activity

M&T's lending levels reflected excellent responsiveness to the assessment area credit needs in MSA 41540 (Salisbury, MD-DE). This conclusion is based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered excellent and small business lending was also considered excellent. For the five-year evaluation period, lending activity totaled 2,759 loans consisting of 549 home purchase, 481 refinance, 550 home improvement and 1,179 small business loans. Lending activity increased overall on an annualized basis compared to the prior two-year period, during which lending activity (including Sussex County, DE) totaled 887 loans consisting of 177 home purchase, 346 refinance, 130 home improvement, and 234 small business loans. Annualized HMDA and small business volume for the evaluation period increased 24.4% compared to the previous evaluation period on an annualized basis. This annualized increase was driven primarily by increases in home purchase (24.1%), home improvement (69.2%) and small business (101.5%) loan volumes. Comparisons to the aggregate for the evaluation period indicated an annualized increase in lending volume for the aggregate overall.

M&T's market share of deposits was stable while lending market share increased. In 2018, M&T had a deposit market share of 1.7%, and lending market shares of 1.2% in home purchase lending, 4.5% in refinance, 19.9% in home improvement and 4.0% in small business lending. In comparison, the deposit market share in 2014 was 2.1%, with lending market shares of 1.4% in home purchase lending, 1.7% in refinance, 11.7% in home improvement and 3.2% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the multistate MSA 41540 (Salisbury, MD-DE) assessment area. This conclusion was based primarily on M&T's performance in moderate-income census tracts, as there was one low-income census tract in the assessment area in 2014-2016 and no low-income census

tracts in the assessment area in 2017-2018. Overall penetration was good based on excellent penetration for small business lending, good penetration for refinance and home improvement lending, and adequate penetration in home purchase lending.

Analysis of Lending Gaps

The overall penetration of census tracts different income levels in 2018 was 95.6% of all census tracts in the AA when considering HMDA and small business lending. This conclusion is based on the bank's lending in moderate-, middle-, upper- and unknown-income tracts. HMDA and small business penetration in moderate-income census tracts was at 90.9%. Overall penetration of different income tracts in 2014-2017 for HMDA and small business lending was generally comparable as the bank penetrated 88.9% of all census tracts in 2017, 92.2% in 2016, 91.1% in 2015 and 91.1% in 2014.

MSA 41540 (Salisbury, MD-DE)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	0	0	0.0%
Moderate	11	1	90.9%
Middle	51	0	100.0%
Upper	25	0	100.0%
Unknown	3	3	0.0%
Total Tracts	90	4	95.6%
2017			
Low	0	0	0.0%
Moderate	11	2	81.8%
Middle	51	2	96.1%
Upper	25	3	88.0%
Unknown	3	3	0.0%
Total Tracts	90	10	88.9%
2016			
Low	1	1	0.0%
Moderate	12	2	83.3%
Middle	57	1	98.2%
Upper	17	0	100.0%
Unknown	3	3	0.0%
Total Tracts	90	7	92.2%
2015			
Low	1	1	0.0%
Moderate	12	2	83.3%
Middle	57	2	96.5%
Upper	17	0	100.0%
Unknown	3	3	0.0%
Total Tracts	90	8	91.1%
2014			
Low	1	1	0.0%
Moderate	12	1	91.7%
Middle	57	1	98.2%
Upper	17	2	88.2%
Unknown	3	3	0.0%
Total Tracts	90	8	91.1%

Home Purchase

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 4.5% by number and 2.5% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts by number and volume was below the 7.7% of owner-occupied housing units located

in moderate-income census tracts and slightly below the aggregate, which made 5.2% by number and 3.0% by dollar in moderate-income census tracts.

In 2014-2017, home purchase performance was consistent with 2018's performance. In 2014 and 2017, the bank's home purchase lending in moderate-income tracts was comparable to the demographic and exceeded the aggregate. In 2015 and 2016, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate. The bank did not make any home purchase loans in the low-income tract present in the assessment area from 2014-2017.

Refinance

The geographic distribution of refinance loans reflected good penetration throughout the assessment area. In 2018, the bank made 7.1% by number and 3.4% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts by number was comparable to the demographic figure of 7.7% of owner-occupied housing units located in moderate-income census tracts. However, by dollar, performance was below the demographic figure. M&T's refinance lending in moderate-income census tracts exceeded the aggregate, which made 5.1% by number and 3.0% by dollar in moderate-income census tracts.

The bank's refinance lending in moderate-income census tracts for 2014-2017 was consistent with 2018. In 2014 and 2017, performance exceeded the demographic and the aggregate while 2015 and 2016 was below the demographic. In 2015, performance was below the aggregate while performance was comparable to the aggregate in 2016.

The bank did not make any home purchase loans in the low-income tract present in the assessment area from 2014-2016.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made 5.1% by number and 3.0% by dollar of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts by number and dollar was below the 7.7% of owner-occupied housing units located in moderate-income census tracts; however, performance exceeded the aggregate, which made 4.6% by number and 2.7% by dollar in moderate-income census tracts.

The bank's home improvement lending in moderate-income census tracts for 2014, 2015, and 2017 exceeded the demographic and aggregate. Performance in 2016 was comparable to the demographic and aggregate.

The bank did not make any home improvement loans in the low-income tract present in the assessment area from 2014-2017.

Small Business

The geographic distribution of small business loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 11.1% of its small business loans in moderate-income tracts. Small business lending performance in moderate-income census tracts exceeded the demographic of the assessment area where 10.3% of businesses were located. Additionally, small business lending exceeded the aggregate, which made 9.0% by number and 9.1% by dollar in moderate-income census tracts.

Small business lending performance in 2014-2017 was consistent with 2018 performance as it exceeded the demographic and the aggregate in 2014, 2015 and 2016. Small business lending in moderate-income census tracts for 2017 was comparable to the demographic and the aggregate.

The bank did not make any small business loans in the low-income tract present in the assessment area from 2014-2016.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in MSA 41540 (Salisbury, MD-DE). Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of $1 million or less was adequate. Greater weight was given to the analysis of small business lending based on the loan volumes.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. In 2018, the bank made 7.5% by number and 3.0% by dollar to low-income borrowers. Performance was significantly below the 20.3% of low-income families in the assessment area and was above the aggregate lending data of 4.0% by number and 1.9% by dollar. The bank's lending to moderate-income borrowers, at 19.4% by number and 10.7% by dollar, was consistent with the 17.8% of moderate-income families in the assessment area by number but below by dollar. Performance was above the aggregate lending data, which was 13.0% by number and 8.5% by dollar.

M&T's lending to low-income borrowers for 2014-2017 was slightly below the bank's 2018 lending performance. Lending to low-income borrowers was above aggregate lending data in 2015 and2017 and was consistent with aggregate lending data in 2014 and 2016. Performance was significantly below the demographic figure in each year. The bank's lending to moderate-income borrowers in 2014-2017 varied according to 2018 performance. The bank's lending in 2014-2015 was consistent with 2018 performance as it exceeded the aggregate performance and was

comparable to the demographic figure. In 2016 and 2017, the bank's lending to moderate-income borrowers was comparable to the aggregate lending data but below the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for refinance loans. In 2018, the bank made 12.2% by number and 8.0% by dollar to low-income borrowers. Performance was below the 20.3% of low-income families in the assessment area and was slightly above with the aggregate lending data of 8.4% by number and 4.3% by dollar. The bank's lending to moderate-income borrowers, at 17.3% by number and 10.3% by dollar, was consistent with the number of moderate-income families in the assessment area while it was below by dollar. The bank's lending to moderate-income borrowers was comparable to the aggregate lending data at 15.8% by number and 10.3% by dollar.

M&T's lending to low-income borrowers for 2014-2017 was slightly below the bank's 2018 lending performance. While lending in 2015 was comparable to the aggregate lending data, 2014, 2016, and 2017 lending performance fell below aggregate lending data. Consistent with 2018 lending, 2014-2017 lending to low-income borrowers was below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was slightly above the 2018 performance. In 2014 and 2017, lending exceeded both the aggregate lending and demographic figure, while 2015 and 2016 exceeded aggregate lending but was below the demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, excellent penetration among customers of different income levels for home improvement loans. In 2018, the bank made 8.4% by number and 5.6% by dollar to low-income borrowers. Performance was below the 20.3% of low-income families in the assessment area, but was consistent with the aggregate lending data, at 8.4% by number and 5.2% by dollar. The bank's lending to moderate-income borrowers, at 18.0% by number and 11.5% by dollar, was consistent with both the aggregate lending data, at 15.7% by number and 11.0% by dollar and the 17.8% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending, while being comparable to the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was above the 2018 performance. The bank's lending exceeded both the aggregate lending data, and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, adequate penetration among businesses of different sizes. In 2018, the bank originated 64.3% of loans by number and

36.0% by dollar to businesses with gross annual revenues of $1 million or less. The bank's lending exceeded aggregate lending data by number at 45.5% and below the aggregate lending performance of 42.3% by dollar. Performance was significantly below the percentage of businesses in the assessment area with gross annual revenues of $1 million or less, at 92.3%. While the bank's loan volume was significantly below the demographic figure, the bank originated 75.1% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. The bank's lending slightly exceeded aggregate lending data and significantly fell below the demographic figure. Additionally, the bank originated most of their loans in amounts of $100,000 or less.

Community Development Lending

M&T made an adequate level of community development loans in multistate MSA 41540 (Salisbury, MD-DE) with three community development loans for $15.9 million. M&T ranked fourth out of five similarly-situated banks when comparing annualized community development loans to deposits within the MSA 41540 (Salisbury, MD-DE) assessment area.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	1	10,517
Economic Development	2	5,413
Total	**3**	**15,930**

The affordable housing loan supported the acquisition and rehabilitation of an affordable housing project to convert 104 units of subsidized rental units. The economic development loans financed a construction project through the SBA 504 (a) lending product.

INVESTMENT TEST

M&T's performance in MSA 41540 (Salisbury, MD-DE) under the investment test is rated High Satisfactory. The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited an adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 16 qualified investments, consisting of $13.9 million current period and four prior period investments totaling $439 thousand, for an approximate total of $14.3 million. M&T ranked fourth out of five similarly-situated banks of which a majority had Outstanding ratings.

The bank made eleven new investments that benefited the assessment area by supporting significant affordable housing projects, totaling approximately $8.9 million.

Qualified Community Development Investments by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 41540 (Salisbury, MD-DE)- New	11	8,906	0	0	1	5,000	0	0	12	13,906
MSA 41540 (Salisbury, MD-DE) – Prior Period	4	439	0	0	0	0	0	0	4	439
Total	15	9,345	0	0	1	5,000	0	0	16	14,345

The following are examples of qualified investments that met critical needs in the assessment area:

- A $5.0 million investment in the Rural Business Investment Corporation that promoted economic development in underserved rural areas.

- A $2.5 million investment in LIHTC that supported the acquisition and rehabilitation of 56 units of affordable housing for LMI individuals.

- A $2.5 million investment in LIHTC that supported the rehabilitation of 34 units, ensuring affordable housing for LMI individuals.

In addition to qualified investments M&T made $897,420 of grants and donations to 176 organizations in the assessment area during the evaluation period. The grants and donations were primarily comprised of funds for community services.

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 41540 (Salisbury, MD-DE)	28	136,180	136	736,540	12	24,700	0	0	176	897,420

SERVICE TEST

M&T's performance under the service test in MSA 41540 (Salisbury, MD-DE) is rated High Satisfactory based on delivery systems that were accessible to the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations did not adversely affect accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals, and services that were tailored to the convenience and needs of the assessment area particularly in LMI geographies and/or LMI individuals. M&T also provided a relatively high level of community development services.

Retail Services

M&T's delivery systems were accessible to the bank's geographies and individuals of different income levels in this assessment area. M&T operated 19 branches in this assessment area, of which two (10.5%) were in moderate-income areas. In comparison, 14.4% of the MSA's population resided in moderate-income areas, respectively.

Alternative delivery systems did not enhance the bank's performance in this assessment area. M&T had 11 offsite ATM locations in the assessment area, none of which were in moderate-income areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

The bank's hours and services were tailored to meet the needs of the assessment area, including LMI geographies and/or LMI individuals. Of the 19 branches in the MSA, 18 branches or 94.7% had early morning or late evening hours and 10 branches (52.6%) had Saturday hours respectively. Of the two branches in LMI census tracts, both had extended and Saturday hours.

Community Development Services

M&T provided a relatively high level of community development services in MSA 41540 (Salisbury, MD-DE). The adjacent table shows the number and type of services performed. The majority of the services consisted of financial education seminars for LMI borrowers and first-time homebuyers. In addition, management and staff served on the board of directors for 28 nonprofit organizations in this MSA.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	161
Technical Assistance	3
Small Business Seminars	0
Board Participation	28
Total	**192**

MULTISTATE METROPOLITAN AREA

CRA RATING FOR MSA 47900 (WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV)[6]: Satisfactory

The Lending test is rated: Outstanding

The Investment test is rated: High Satisfactory

The Service test is rated: High Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected excellent responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected excellent penetration throughout the bank's assessment areas.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an excellent record of serving the credit needs of low-income individuals and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- Made a significant level of qualified investments and grants particularly those not routinely provided by investors, occasionally in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.

[6] This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of the state contained within the multistate metropolitan area.

- Exhibited good responsiveness to credit and community development needs.

Service Test:

- Delivery systems were readily accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced the needs of its assessment area particularly LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

SCOPE OF EXAMINATION

A full-scope review was conducted of M&T's performance in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) based on deposit concentration, lending volume, and branch office network. As shown in Exhibit I, activities in this multistate MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) made up 3.9% of the bank's deposits and 9.9% of branches, and 7.5% of the bank's loans.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 47900 (WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV)

As of December 31, 2018, M&T had 74 branches in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV), representing 9.9% of the bank's branches. The bank generated 3.9% of its total deposits in the MSA during the evaluation period.

M&T is the 12th largest bank in the assessment area in terms of deposits, with a 1.7% market share as of June 30, 2018. This assessment area is a competitive marketplace where large regional banks compete. Some of M&T's primary competitors in this assessment area are: Bank of America N.A, Capital One Bank N.A, Wells Fargo Bank N.A., SunTrust Bank, Branch Banking and Trust Co. PNC Bank N.A., Citibank N.A, TD Bank N.A, and HSBC Bank USA N.A.

Community Contacts

Three community contacts were conducted to discuss local economic conditions and community needs. One community contact was with a nonprofit developer that specializes in the preservation of affordable housing in the Capital region of Baltimore, MD, Washington, DC, and Richmond, VA. The contact described the current economic make-up of the DC Metro area as a progressive, fast growing business district composed of various income and mixed-use properties. The contact indicated affordable housing was a need of the assessment area.

A second contact was conducted with a county economic development agency dedicated to recruiting new businesses, growing existing industries and improving the county's business climate through providing a wide range of services for new and existing businesses. The contact noted the need for financial education and that several local institutions are actively participating in workshops designed for small businesses. The contact also cited participation in the Paycheck Protection Program (PPP) as an essential opportunity for participation by local financial institutions in addressing economic hardships caused by the global pandemic.

A third contact was conducted with a nonprofit housing developer and counseling agency. The agency helps low- and moderate-income households by creating affordable housing through green developing and offers economic security with their counseling services. The organization is dedicated to revitalizing neighborhoods and providing services that improve quality of life. The contact noted that affordable housing was a primary concern in the area. The contact indicated that challenges for the community are affordable housing and availability of housing, specifically for the low- and moderate-income population.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, D&B, FFIEC, DOL, and HUD.

Demographic Characteristics

M&T's MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area consisted of the entirety of MD 43524 (Silver Spring-Frederick-Rockville, MD) and portions of MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV), which included: Alexandria City, Arlington County, Fairfax County, Fairfax City, Falls Church City, Fredericksburg City, Loudoun County, Manassas City, Manassas Park City, Prince William County, and Spotsylvania County in the State of Virginia; Prince George's County, Calvert County, and Charles County in the State of Maryland; and the District of Columbia. According to the 2015 ACS, the population of the assessment area was approximately 5.6 million, with Washington, DC being the urban hub, making it the sixth largest metropolitan area in the United States. Between 2010 and 2015, the region grew by more than 5.6% adding almost 298,000 new residents.

Of the MSA's total census tracts, 128 or 10.0% were low-income tracts, 281 or 22.0% were moderate-income tracts, 430 or 33.6% were middle-income, 422 or 33.0% were upper-income, and 18 or 1.4% were of unknown-income. The LMI geographies were concentrated in the District of Columbia.

Income Characteristics

The MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area had 1.3 million families, of which 22.0% were considered low-income, 16.6% were moderate-income and 5.8% were below the poverty level. The FFIEC-estimated median incomes for the MDs comprising the MSA were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$103,017	$108,831
MD 43524 (Silver Springs-Frederick-Rockville, MD)	$107,192	$111,870
MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	$101,698	$107,856
State of Maryland	$85,098	$90,089
State of Virginia	$73,514	$78,390

MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) has some of the most affluent communities in the country, but it also has some of the most significant pockets of poverty, particularly in the District of Columbia.

Housing Characteristics

The assessment area contains 2.1 million housing units, of which 58.5% or 1.3 million are owner-occupied, according to the 2015 ACS. Of the available owner-occupied housing units, 3.9% and 17.4% are in low- and moderate-income census tracts, respectively. According to 2015 ACS information, the median housing value in the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area in 2018 was $387,782 with an affordability ratio of 23.8.

The median gross rent in the assessment area was $1,514 per month. Within the assessment area, 46.4% of all renters had rental costs that exceeded 30% of their incomes. The table below presents housing characteristics from the 2010 Census and the 2015 ACS for the assessment area and the States of Maryland and Virginia.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$423,451	20.1	$387,782	23.8	$1,293	$1,514	10.9%
MD 43524 (Silver Springs-Frederick-Rockville, MD)	$450,061	20	$410,072	23.2	$1,380	$1,568	12.5%

MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV))	$414,179	20.3	$381,160	24.0	$1,266	$1,498	11.7%
State of Maryland	$329,400	21.5	$286,000	26.0	$1,091	$$1,230	13.7%
State of Virginia	$255,100	24.1	$245,000	26.5	$970	$$1,116	8.5%

According to community contacts, housing affordability is a major concern in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) for both homeowners and renters. The supply of affordable housing is limited, and due to the strong demand, landlords are looking at converting units to market rate rents.

Labor, Employment and Economic Characteristics

According to D&B data, the assessment area had a total of 321,868 businesses in 2018, of which 291,893 (90.7%) were small businesses with GAR of $1 million or less.

The Washington, DC region currently has one of the healthiest economies in the country. The area economy depends on local and federal government, as well as the service, retail trade, systems integration, telecommunications, and biotechnology industries.

Unemployment rates for the assessment area steadily declined over the review period as seen in the following table. During the evaluation period, average annual unemployment rates showed slight improvements although rates were highest in the city of Washington, DC.

U.S. Department of Labor **Annual Unemployment Rates**					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MD 43524 (Silver Springs-Frederick-Rockville, MD)	3.9	3.3	3.1	3.1	2.8
MD 47894 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	4.6	3.9	3.7	3.4	3.1
State of Virginia	3.9	3.3	3.1	3.1	2.4
State of Maryland	4.6	3.8	3.8	3.1	2.8

Additional performance context data for this assessment area is provided in the subsequent MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: Wash-Arlingtn-Alex, DC-VA-MD-WV (MSA 47900) 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	128	10	110,604	8.4	23,214	21	289,272	22
Moderate-income	281	22	266,691	20.3	22,805	8.6	218,157	16.6
Middle-income	430	33.6	457,189	34.8	19,828	4.3	263,971	20.1
Upper-income	422	33	475,225	36.2	9,510	2	541,273	41.2
Unknown-income	18	1.4	2,964	0.2	496	16.7	0	0
Total Assessment Area	**1,279**	**100.0**	**1,312,673**	**100.0**	**75,853**	**5.8**	**1,312,673**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	207,883	48,997	3.9	23.6	138,011	66.4	20,875	10
Moderate-income	457,590	217,936	17.4	47.6	206,513	45.1	33,141	7.2
Middle-income	744,589	469,276	37.4	63	231,248	31.1	44,065	5.9
Upper-income	726,038	517,220	41.2	71.2	170,712	23.5	38,106	5.2
Unknown-income	9,489	1,874	0.1	19.7	6,861	72.3	754	7.9
Total Assessment Area	**2,145,589**	**1,255,303**	**100.0**	**58.5**	**753,345**	**35.1**	**136,941**	**6.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	16,300	5.1	14,924	5.1	1,183	4.5	193	5.1
Moderate-income	59,816	18.6	53,934	18.5	5,277	20.1	605	16.1
Middle-income	110,386	34.3	100,217	34.3	9,066	34.6	1,103	29.3
Upper-income	133,399	41.4	121,304	41.6	10,467	39.9	1,628	43.2
Unknown-income	1,967	0.6	1,514	0.5	214	0.8	239	6.3
Total Assessment Area	**321,868**	**100.0**	**291,893**	**100.0**	**26,207**	**100.0**	**3,768**	**100.0**
	Percentage of Total Businesses:			**90.7**		**8.1**		**1.2**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN MSA 47900 (WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV)

LENDING TEST

M&T's performance under the lending test in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) is Outstanding. This performance is based on the fact that the bank's lending levels reflected excellent responsiveness to the assessment area credit needs, geographic distribution of loans reflected excellent penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

Greater weight was given to the analysis of small business lending performance in the analysis of geographic and borrower distribution based on the volume of lending. Multifamily lending was only considered in the evaluation of community development lending, and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

Lending Activity

M&T's lending levels reflected excellent responsiveness to the assessment area credit needs in MSA 47900 (Washington-Arlington-Alexandria, DC-MD-VA-WV). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered good while small business lending was excellent. For the five-year evaluation period, lending activity totaled 9,758 loans consisting of 2,421 home purchase, 2,117 refinance, 786 home improvement and 4,434 small business loans. Lending activity declined on an annualized basis compared to the prior two-year period, during which lending activity totaled 4,831 loans consisting of 1,176 home purchase, 2,213 refinance, 205 home improvement, and 1,237 small business loans. Overall, HMDA and small business volume for the evaluation period decreased 19.2% on an annualized basis compared to the previous evaluation period. This decrease was driven primarily by decreases in annualized home purchase (-17.7), and refinance (-61.7%) lending. Increases occurred in annualized home improvement (53.4%) and small business (43.4%) loan volumes. Analysis conducted on aggregate lending for the evaluation period indicated a decrease in lending volume for the aggregate.

Over the evaluation period, M&T's market share of deposits was stable while lending market share in the assessment area was mixed. In 2018, M&T had a deposit market share of 1.7%, and lending market shares of 0.3% in home purchase lending, 1.0% in refinance, 2.9% in home improvement and 0.8% in small business lending. In comparison, the deposit market share in 2014 was 2.1%, with a lending market share of 0.6% in home purchase lending, 5.0% in refinance lending, 0.9% in home improvement lending, and 0.7% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected excellent penetration throughout the multistate MSA 47900 (Washington-Arlington-Alexandria, DC-MD-VA-WV) assessment area. Geographic distribution in LMI census tracts was excellent for home purchase, refinance, home improvement, and small business lending.

Analysis of Lending Gaps

The overall penetration of census tracts of different income levels in 2018 was 66.5% of all census tracts in the AA when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 46.1% of low-income census tracts and 63,3% of moderate-income census tracts. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending was slightly lower as the bank penetrated 59.0% of all census tracts in 2017, 61.4% in 2016, 60.1% in 2015 and 58.6% in 2014.

MSA 47900 (Washington-Arlington-Alexandria, DC-MD-VA-WV)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	128	69	46.1%
Moderate	281	103	63.3%
Middle	430	117	72.8%
Upper	422	123	70.9%
Unknown	18	17	5.6%
Total Tracts	1279	429	66.5%
2017			
Low	128	78	39.1%
Moderate	281	107	61.9%
Middle	430	146	66.0%
Upper	422	179	57.6%
Unknown	18	15	16.7%
Total Tracts	1279	525	59.0%
2016			
Low	120	80	33.3%
Moderate	311	109	65.0%
Middle	438	139	68.3%
Upper	397	154	61.2%

Unknown	13	12	7.7%
Total Tracts	1279	494	61.4%
2015			
Low	120	71	40.8%
Moderate	311	124	60.1%
Middle	438	143	67.4%
Upper	397	159	59.9%
Unknown	13	13	0.0%
Total Tracts	1279	510	60.1%
2014			
Low	120	73	39.2%
Moderate	311	109	65.0%
Middle	438	151	65.5%
Upper	397	183	53.9%
Unknown	13	13	0.0%
Total Tracts	1279	529	58.6%

Home Purchase

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 5.6% by number and 5.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending in low-income census tracts exceeded the 3.9% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 4.9% by number and 3.8% by dollar in low-income census tracts. In 2018, the bank made 18.9% by number and 13.8% by dollar of home purchase loans in moderate-income census tracts. Home purchase lending in moderate-income census tracts, by number, exceeded the 17.4% of owner-occupied housing units located in moderate-income census tracts and also exceeded the aggregate, which made 17.3% by number and 12.5% by dollar in moderate-income census tracts.

The bank's home purchase lending for 2014-2017 was consistent with 2018's performance. Performance in low-income census tracts for 2014, 2015 and 2017 exceeded the demographic and the aggregate, while 2016 performance was comparable to the demographic and slightly below the aggregate. The bank's home purchase lending in moderate-income census tracts for 2014-2017 review years exceeded the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected excellent penetration throughout the assessment area based on performance between 2014-2017. In 2018, the bank made 4.0% by number and 3.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was comparable to the 3.9% of owner-occupied housing units located in low-income census tracts. Additionally, M&T's refinance lending in low-income census tracts was slightly below the aggregate, which was 5.1% by number and 4.1% by dollar in low-income census tracts. In 2018, the bank made 14.6% by number and 10.2% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number, was slightly below the 17.4% of owner-occupied housing units located in moderate-income census tracts. M&T's refinance lending in moderate-income census tracts was also slightly below the aggregate, which made 17.5% by number and 12.9% by dollar in moderate-income census tracts.

However, the bank's refinance lending in both low- and moderate-income census tracts for 2014-2017 exceeded 2018's performance, as refinance lending was above both the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans showed excellent penetration throughout the assessment area. In 2018, the bank made 3.5% by number and 2.7% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending in low-income census tracts, by number, was comparable to the 3.9% of owner-occupied housing units located in low-income census tracts and also comparable to the aggregate, which made 3.6% by number and 3.5% by dollar in low-income census tracts. In 2018, the bank made 15.0% by number and 10.5% by dollar of home improvement loans in moderate-income census tracts. Home improvement lending in moderate-income census tracts, by number, was slightly below the 17.4% of owner-occupied housing units located in moderate-income census tracts. However, it exceeded the aggregate, which made 12.8% by number and 10.1% by dollar in moderate-income census tracts

In 2014-2017, M&T's home improvement lending exceeded 2018's performance in low- and moderate-income census tracts. The bank's home improvement lending in low-income census tracts for 2014 exceeded both the demographic and the aggregate. The bank's home improvement lending in low-income census tracts for 2015 and 2017 exceeded the demographic and was slightly below aggregate. The bank's home improvement lending in low-income census tracts for 2016 was comparable to the demographic and below the aggregate. The bank's home improvement lending in moderate-income census tracts in 2014, 2015 and 2017 exceeded the demographic and the aggregate. The bank's home improvement lending in moderate-income census tracts in 2016 was comparable to the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 5.3% by number and 6.4% by dollar of small business loans in low-income census tracts. Small business lending in low-income census tracts, by number, was comparable to the demographics of the assessment area where 5.1% of businesses were located while performance exceeded the aggregate, which made 4.4% by number and 4.5% by dollar in low-income census tracts. In 2018, the bank made 22.4% by number and 19.7% by dollar volume of small business loans in moderate-income census tracts, exceeding the demographics of the assessment area which denoted that 18.6% of businesses were in moderate-income census tracts. Performance also exceeded the aggregate, which made 18.3% by number and 18.5% by dollar in moderate-income census tracts.

The bank's small business lending in 2014-2017 was consistent with 2018's performance. Performance in low-income census tracts in 2014, 2015 and 2016 was comparable to the demographic and the aggregate. The bank's small business lending in low-income census tracts in 2017 exceeded the demographic and the aggregate. The bank's small business lending in moderate-income census tracts for 2014-2017 generally exceeded both the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 47900 (Washington-Arlington-Alex, DC-VA-MD-WV) assessment area is good. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of $1 million or less was adequate.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase lending. The bank's 2018 lending to low-income borrowers, which comprised 13.0% by number and 7.4% by dollar, was above the aggregate lending data, at 8.0% by number and 4.2% by dollar. Performance was significantly below the demographic figure, at 22.0%. The bank's lending to moderate-income borrowers, at 32.2% by number, and 24.7% by dollar significantly exceeded the aggregate lending data, at 20.4% by number and 14.5% by dollar and the demographic figure of 16.6%.

M&T's lending to low-income borrowers for 2015-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers was above the aggregate data lending but was significantly below the demographic figure. However, in 2014, the bank's lending was below the aggregate lending and significantly below the demographic figure. The bank's lending to

moderate-income borrowers in 2014-2017 was slightly below the 2018 performance. The bank's lending in 2017 was consistent with 2018 performance, significantly exceeding both the aggregate and demographic figure. Lending in 2016 to moderate income borrowers was comparable to the aggregate lending data and the demographic figure. In 2015, the bank's lending was above both the aggregate data and demographic figure and in 2014 lending was below both figures.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 16.2% by number and 9.1% by dollar, was above the aggregate lending data, at 11.2% by number and 6.6% by dollar. Performance was slightly below the demographic figure, at 22.0%. The bank's lending to moderate-income borrowers, at 18.2% by number and 12.2% by dollar, was comparable to both the aggregate lending data at 18.5% by number and 13.8% by dollar, and the demographic figure, at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 was slightly below with the bank's 2018 lending performance. In 2015-2017, lending to low-income borrowers was above the aggregate lending data but was significantly below the demographic figure. In 2014, performance was slightly below the aggregate lending data and significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2015-2017 was comparable to the 2018 performance. The bank's lending in 2015-2017 was above the aggregate lending data, and comparable to the demographic figure. The bank's 2014 lending to the moderate-income borrowers was below both the aggregate lending data and the demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, excellent penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 14.1% by number and 7.8% by dollar, was above the aggregate lending data, at 7.5% by number and 4.5% by dollar, while it fell below the demographic figure, at 22.0%. The bank's lending to moderate-income borrowers, at 20.6% by number and 15.4% by dollar, was above both the aggregate lending data at 14.9% by number and 10.7% by dollar, and the demographic figure, at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers significantly exceeded the aggregate data lending and was slightly above the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending was above the aggregate lending data, and comparable to the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, adequate penetration among businesses of different sizes for small business loans. In 2018, the bank originated 58.8% of loans by number and 34.1% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data, at 48.4% by number and 31.9% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1MM or less, at 90.7%. While the bank's loan volume was significantly below the demographic figure, the bank originated 68.0 % of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014-2017 was below 2018 lending. While lending in 2015 fell below the aggregate lending data and significantly fell below the demographic figure, the bank's lending in 2014, 2016 and 2017 to small businesses was comparable to aggregate lending but significantly below the demographic figure.

Community Development Lending

M&T was a leader in community development lending in multistate MSA 47900 (Washington-Arlington-Alexandria, DC-MD-V-WV) with 77 community development loans, totaling $494.3 million. M&T ranked second of six similarly-situated banks when comparing annualized community development loans to deposits within the MSA 47900 (Washington-Arlington-Alexandria, DC-MD-V-WV) assessment area. Community development lending was responsive to identified needs within MSA 47900 (Washington-Arlington-Alexandria, DC-MD-V-WV).

Lending efforts, by dollar, supported all areas of community development in the MSA with 45.6% targeting community services and 42.8% directed towards affordable housing activity.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	29	211,463
Community Services	38	225,464
Economic Development	8	20,546
Revitalize and Stabilize	2	36,800
Total	**77**	**$494,273**

Examples of community development lending include:

- A $60.8 million loan to construct 330 affordable units in a low-income tract.
- A $45.0 million line of credit to a nonprofit owner and operator of affordable housing properties.
- A $37.0 million bridge loan for a skilled nursing facility providing healthcare services to individuals who receive or are eligible to receive Medicaid.
- A $35.0 million loan for the revitalization of a shopping center in a moderate-income tract.

INVESTMENT TEST

M&T's performance in the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area under the investment test is rated High Satisfactory. The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, and occasionally in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited good responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 54 qualified investments, consisting of $100.6 million current period investments and $9.6 million prior period investments, for an approximate total of $110.2 million. M&T ranked 4th of six similarly-situated banks.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) - New	9	47,486	2	53,098	0	0	0	0	11	100,584
MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) – Prior Period	42	9,426	0	0	0	0	1	187	43	9,613
Total	51	56,912	2	53,098	0	0	1	187	54	110,197

The following are examples of qualified investments that met critical needs in the assessment area:

- A $21.9 million investment in a tax-exempt bond that supported improvements to a charter school in the District of Columbia located in a moderate tract. The majority of students (55%) are eligible for free or reduced rate lunches.
- A $5.2 million LIHTC investment, that supported construction of 39 housing units at 50% of AMI, intermixed with 156 market -rate units. All 39 units will be covered under a 20-year project-based HUD Section 8 contract.
- A $3.6 million LIHTC investment that supported rehabilitation of 350 housing units for seniors and disabled non-seniors earning less than 60% AMI.

- Deposits totaling $700,000 in a Community Development Financial Institution (CDFI).

In addition to qualified investments, M&T made 275 grants for 2.3 million in the assessment area during the evaluation period. The grants and donations were primarily comprised of funds for community services.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

Area	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	24	80,000	234	1,983,799	11	144,500	6	38,000	275	2,246,299

SERVICE TEST

M&T's performance under the service test in MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) is rated High Satisfactory based on delivery systems that were readily accessible to the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations did not adversely affect accessibility, services did not vary in a way that inconvenienced the needs of the assessment area, and the bank provided a relatively high level of community development services.

Retail Services

M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in this assessment area. M&T operated 74 branches in this assessment area, of which three (4.1%) of the branches were in a low-income area and 21 (28.4%) were in moderate-income areas. This compares to the 9.2% and 21.3% of the MSA's population residing in low- and moderate-income areas.

Alternative delivery systems did not enhance the bank's performance in this assessment area. M&T had 60 off-site ATM locations in the assessment area, of which one (1.6%) was in a low-income area and 13 (21.6%) were in moderate-income areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. M&T closed one branch in the assessment area, which was in a middle-income tract.

The bank's hours and services did not vary in a way that inconvenienced the needs of the assessment area, including LMI geographies and/or LMI individuals. Of the 74 branches in the MSA, 26 or 35.0% had extended hours and 35 branches (47.0%) had Saturday hours. Of the 24

branches in LMI census tracts, 8 branches (33.3%) had extended hours and 11 branches (45.8%) had Saturday hours.

Community Development Services

The bank provided a relatively high level of community development services in the MSA throughout the evaluation period. The table shows the number and type of services, with the majority being mortgage education seminars. In addition, management and staff served on the board of directors for 64 nonprofit and community-based organizations in the MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV) assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Financial Education	844
Technical Assistance	4
Small Business Seminars	2
Board Participation	64
Total	**914**

STATE OF CONNECTICUT

CRA RATING FOR CONNECTICUT[7]: SATISFACTORY

The Lending test is rated: High Satisfactory

The Investment test is rated: Low Satisfactory

The Service test is rated: Low Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected excellent penetration throughout the bank's assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- Made an adequate level of qualified investments and grants particularly those not routinely provided by investors, rarely in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.

[7] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

- Exhibited adequate responsiveness to credit and community development needs.

Service Test:

- Delivery systems were unreasonably inaccessible to a portion of the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced its assessment area particularly LMI geographies and/or LMI individuals
- Provided a relatively high level of community development services.

SCOPE OF EXAMINATION

Examiners evaluation of M&T's activities in the State of Connecticut consisted of a full-scope review of MSA 14860 (Bridgeport-Stamford-Norwalk, CT). Activities within the State of Connecticut were conducted entirely within the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area. As shown in Exhibit I, this assessment area had a very small proportion of M&T's loans and deposits. The assessment area was evaluated under full-scope procedures as it is the only assessment area in the State of Connecticut.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CONNECTICUT

The State of Connecticut assessment area maintained a low level of deposit base and branch presence. As detailed in Exhibit I, as of December 31, 2018, M&T operated nine branches in the State of Connecticut, all of which were acquired in the merger with Hudson City Savings Bank on November 1, 2015. One of the nine branches was in an LMI census tract. M&T maintained a deposit base equal to $434 million in the State of Connecticut assessment area. HMDA lending and small business lending in this geography was approximately 0.8% of M&T's total lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

Conclusions regarding M&T's performance in the State of Connecticut with respect to the lending, investment, and service tests are solely based on performance in MSA 14860 (Bridgeport-Stamford-Norwalk, CT). M&T's performance under the lending test is rated High Satisfactory. Performance under the investment test, and service test is rated Low Satisfactory. Specific comments regarding the lending, investment, and service tests are discussed below.

METROPOLITAN AREA

(FULL REVIEW)

MSA14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)

MSA 14860 (Bridgeport-Stamford-Norwalk, CT) is located in southwestern Connecticut and consisted of Fairfield County. The MSA is a competitive marketplace where large super-regional banks compete with community banks, savings and loan associations, and non-financial institutions. Based on the summary of deposits reported to the FDIC as of June 30, 2018, M&T operated nine branches in MSA 14860 (Bridgeport-Stamford-Norwalk, CT), all of which were acquired on November 1, 2015 with the merger with Hudson City Savings Bank. The bank had less than 1.0% of deposit market share in the assessment area. Prior to the 2015 merger, the bank had exited this market, closing its only branches in 2014.

Community Contacts

In order to learn more about community credit needs, examiners conducted and interview with a not-for-profit agency located in MSA 14860 (Bridgeport-Stamford-Norwalk, CT). The organization's mission was to promote was to promote economic development in its locality. The contact stressed the need for all types of community development, including affordable housing, financing for economic development projects, and community services that target financial literacy and financial expertise programs for various community development programs.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) consisted of Fairfield County. M&T's assessment area was comprised of the entire the MSA and represented the bank's total presence in the State of Connecticut. According to the 2015 American Community Survey (ACS), MSA 14860 (Bridgeport-Stamford-Norwalk, CT)'s population totaled 939,983.

Of the 211 census tracts in the assessment area, 31 or 14.7%, were low-income, 40 or 19.0% were moderate-income, 57 or 27.0% were middle-income, 81 or 38.4% were upper-income and two or 0.9% were of unknown income.

Income Characteristics

In 2018, the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area had 232,921 families, of which 24.6% (6.4% of which were below the poverty level) were considered low-income and 15.6% were moderate-income, 17.8% were middle-income, and 42.0% were upper-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$100,593	$105,628
State of Connecticut	$84,170	$89,031

Housing Characteristics

The 2015 ACS showed that MSA 14860 (Bridgeport-Stamford-Norwalk, CT) had 363,556 housing units, of which 62.8% were owner-occupied and 29.1% were rental units. Of the available owner-occupied units, 21.2% were in LMI areas. In low-income census tracts, 61.0% of the housing units were rental units, 13.5% vacant, and 25.5% were owner-occupied. In moderate-income census tracts, 52.8% of the housing units were either rental or vacant, and 47.2% were owner-occupied.

The 2015 ACS showed the median age of housing stock in the assessment area was 52 years old, with 29.0% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement financing.

According to the 2015 ACS, the median housing value in the assessment area was $416,023, with an affordability ratio of 20.7. The median gross rent in the assessment area was $1,348 per month. Within the assessment area, 51.2% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$477,678	16.9	$416,023	20.7	$1,206	$1,348	11.8%
Fairfield County	$477,700	17.0	$416,600	20.3	$1,206	$1,348	11.8%
State of Connecticut	$296,500	22.9	$270,500	26.0	$982	$1,000	1.8%

Labor, Employment and Economic Characteristics

Trade, transportation, and utilities were the largest employment sectors in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) with roughly 74,200 employees, while professional and business services were the second largest employment sector with approximately 71,300 employees. Education, health services and local government were also major employment sectors in MSA 14860 (Bridgeport-Stamford-Norwalk, CT).

According to D&B data, the assessment area had a total of 68,448 businesses in 2018, of which 62,387 (91.1%) were small businesses with GAR of $1 million or less.

Over the review period the unemployment rate fell significantly, indicating improving economic conditions in the assessment area.

U.S. Department of Labor **Annual Unemployment Rates**					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	6.4	5.4	5.0	4.7	4.1
Fairfield County	6.2	5.4	4.9	4.6	4.0
State of Connecticut	6.6	5.7	5.2	4.7	4.2

Additional performance context data for this assessment area is provided in the subsequent MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	31	14.7	25,980	11.2	5,928	22.8	57,209	24.6
Moderate-income	40	19	43,817	18.8	4,671	10.7	36,377	15.6
Middle-income	57	27	71,494	30.7	2,459	3.4	41,431	17.8
Upper-income	81	38.4	91,619	39.3	1,896	2.1	97,904	42
Unknown-income	2	0.9	11	0	0	0	0	0
Total Assessment Area	**211**	**100.0**	**232,921**	**100.0**	**14,954**	**6.4**	**232,921**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	45,976	11,714	5.1	25.5	28,050	61	6,212	13.5
Moderate-income	77,904	36,769	16.1	47.2	34,166	43.9	6,969	8.9
Middle-income	115,194	79,024	34.6	68.6	27,900	24.2	8,270	7.2
Upper-income	124,471	100,874	44.2	81	15,812	12.7	7,785	6.3
Unknown-income	11	0	0	0	11	100	0	0
Total Assessment Area	**363,556**	**228,381**	**100.0**	**62.8**	**105,939**	**29.1**	**29,236**	**8.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6,080	8.9	5,366	8.6	679	12.5	35	5.4
Moderate-income	10,573	15.4	9,466	15.2	1,040	19.2	67	10.4
Middle-income	20,808	30.4	18,974	30.4	1,666	30.8	168	26
Upper-income	30,986	45.3	28,580	45.8	2,031	37.5	375	58.1
Unknown-income	1	0	1	0	0	0	0	0
Total Assessment Area	**68,448**	**100.0**	**62,387**	**100.0**	**5,416**	**100.0**	**645**	**100.0**
	Percentage of Total Businesses:			**91.1**		**7.9**		**0.9**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)

LENDING TEST

M&T's performance in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) is based on the following summary. The bank's lending levels reflected good responsiveness to the assessment area credit needs, geographic distribution of loans reflected excellent penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

Lending Activity

M&T's lending levels reflected good responsiveness to the assessment area credit needs in MSA 14860 (Bridgeport-Stamford-Norwalk, CT). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered adequate while small business lending was good. For the evaluation period, which excluded 2015 due to the acquisition timing, for this assessment area, lending activity totaled 1,162 loans consisting of 513 home purchase, 307 refinance, 51 home

improvement and 291 small business loans. Lending activity increased on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 346 loans consisting of 170 home purchase, 140 refinance, 5 home improvement, and 31 small business loans. Annualized HMDA and small business volumes for the evaluation period increased by 67.9% overall compared to the last evaluation period. This annualized increase was driven by annualized increases in home purchase (50.9%), refinance lending (9.6%), home improvement (410.0%), and small business (369.4%) lending. Analysis of aggregate data for the evaluation period indicated an overall decrease in annualized lending volume for the aggregate.

Over the evaluation period, M&T's market share of deposits increased while lending was stable overall. In 2018, M&T had a deposit market share of 0.9%, and lending market shares of 0.4% in home purchase, 0.9% in refinance, 2.5% in home improvement and 0.3% in small business lending. In comparison, at the beginning of the review period in 2014, the deposit market share was 0.5%, and lending market shares were 0.7% in home purchase lending, 0.4% in refinance lending, 0.2% in home improvement lending, and 0.1% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans throughout the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area reflected overall excellent penetration in LMI census tracts. Lending penetration in LMI census tracts was based on excellent home purchase and small business penetration, good refinance lending penetration, and adequate home improvement lending in LMI census tracts.

Analysis of Lending Gaps

The bank's penetration of different income levels in 2018 was 60.7% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 32.3% of low-income census tracts and 57.5% of moderate-income census tracts. Overall penetration of different income levels in 2015, 2016 and 2017 for HMDA and small business lending was similar, as the bank penetrated 64.0% of all census tracts in 2017, 65.9% in 2016 and 58.8% in 2015. Overall, penetration of different income levels in 2014 for HMDA and small business lending was lower as the bank penetrated 44.5% in 2014.

MSA 14860 (Bridgeport-Stamford-Norwalk, CT)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	31	21	32.3%
Moderate	40	17	57.5%
Middle	57	15	73.7%

Upper	81	28	65.4%
Unknown	2	2	0.0%
Total Tracts	211	83	60.7%
2017			
Low	31	13	58.1%
Moderate	40	8	80.0%
Middle	57	24	57.9%
Upper	81	29	64.2%
Unknown	2	2	0.0%
Total Tracts	211	76	64.0%
2016			
Low	33	17	48.5%
Moderate	37	12	67.6%
Middle	67	20	70.1%
Upper	73	22	69.9%
Unknown	1	1	0.0%
Total Tracts	211	72	65.9%
2015			
Low	33	22	33.3%
Moderate	37	13	64.9%
Middle	67	20	70.1%
Upper	73	31	57.5%
Unknown	1	1	0.0%
Total Tracts	211	87	58.8%
2014			
Low	33	24	27.3%
Moderate	37	13	64.9%
Middle	67	30	55.2%
Upper	73	49	32.9%
Unknown	1	1	0.0%
Total Tracts	211	117	44.5%

Home Purchase

The geographic distribution of home purchase loans reflected excellent distribution throughout the assessment area. In 2018, the bank made 10.0% by number and 6.8% by dollar of home purchase

loans in low-income census tracts. The bank's home purchase lending in low-income census tracts exceeded the 5.1% of owner-occupied housing units located in low-income census tracts and exceeded aggregate lending, which made 5.7% by number and 2.7% by dollar of its loans in low-income census tracts. For 2018, in moderate-income census tracts, M&T made 26.7% by number and 18.6% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts, by number, exceeded the 16.1% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate, which made 17.5% by number and 9.7% by dollar in moderate-income census tracts.

M&T's performance in 2014-2017 was comparable to 2018's excellent performance. Home purchase performance in all years exceeded both the demographic and the aggregate in both low- and moderate-income census tracts.

Refinance

The geographic distribution of refinance loans reflected overall good penetration throughout the assessment area. In 2018, the bank made 1.6% by number and 0.4% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts by number and dollar was below the 5.1% of owner-occupied housing units located in low-income census tracts. Performance was below the aggregate, which made 3.2% by number and 1.4% by dollar in low-income census tracts. In moderate-income census tracts, the bank made 7.9% by number and 3.8% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number, was below the 16.1% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 12.5% by number and 6.6% by dollar in moderate-income census tracts.

In 2014-2017, M&T's refinance lending performance exceeded 2018's performance. In 2014, 2016 and 2017, the bank's refinance lending in low-income census tracts exceeded both the demographic and the aggregate. In 2015, the bank's refinance lending in low-income census tracts was below the demographic but exceeded the aggregate. In moderate-income census tracts in 2014, 2015 and 2017, refinance lending exceeded the demographic and the aggregate, while in 2016 the bank's refinance lending in moderate-income tracts was below the demographic but exceeded the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area. In 2018, the bank did not make any home improvement loans in low-income census tracts, which was below the 5.1% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.0% by number and 1.0% by dollar in low-income census tracts. In 2018, the bank made 15.2% by number and 4.3% by dollar of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts, by number, was below the 16.1% of owner-occupied housing units

located in moderate-income census tracts. However, performance exceeded the aggregate, which made 8.9% by number in moderate-income census tracts. M&T's home improvement lending by dollar amount volume was below the aggregate, which made 5.5% by dollar in moderate-income census tracts.

M&T's home improvement lending in 2014-2017 was below 2018's performance as overall volume was very limited. The bank made eighteen total home improvement loans from 2014-2017, of which one was in a low-income tract and three were in moderate-income tracts.

Small Business

The geographic distribution of small business loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 13.6% by number and 14.1% by dollar of small business loans in low-income census tracts. The bank's small business lending in low-income census tracts exceeded the demographic of the assessment area where 8.9% of businesses were located and exceeded the aggregate, which made 9.4% by number and 11.0% by dollar in low-income census tracts. In 2018, the bank made 20.4% by number and 31.0% by dollar of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income census tracts, by number, exceeded the demographic of the assessment area, where 15.4% of businesses were located. The bank's small business lending also exceeded the aggregate, which made 16.2% by number and 19.2% by dollar in moderate-income census tracts.

In 2014-2017, M&T's small business lending was mixed when compared to 2018's performance. The bank's small business lending in low-income census tracts in 2014 was comparable to the demographic and the aggregate. In 2015 and 2016, small business lending in low-income census tracts exceeded the demographic and the aggregate. The bank's small business lending in low-income census tracts in 2017 was below the demographic and the aggregate. In moderate-income census tracts in 2014-2017, the bank's small business lending exceeded both the aggregate and the demographic.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in MSA 14860 (Bridgeport-Stamford-Norwalk, CT). Overall, HMDA lending to low- and moderate-income borrowers was adequate and lending to businesses with gross annual revenues of $1 million or less was adequate.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-

income borrowers, which comprised 8.3% by number and 4.1% by dollar, was comparable to the aggregate lending data, at 7.7% by number and 3.1% by dollar; however, the bank's lending was below the demographic figure, at 24.6%. The bank's lending to moderate-income borrowers, at 31.7% by number and 24.7% by dollar, exceeded both the aggregate lending data at 20.0% by number and 11.0% by dollar and the demographic figure, at 15.6%.

M&T's lending to low-income borrowers for 2015-2017 was slightly above the bank's 2018 lending performance. Lending to low-income borrowers was above the aggregate lending data, with the exception of 2014 lending, which was below the aggregate lending data. However, when compared to the demographic figure, the bank's lending was below in each year. The bank's lending to moderate-income borrowers in 2014-2017 was slightly below 2018 performance. The bank's lending was comparable to the aggregate lending data in 2016 and exceeded aggregate lending data in 2015 and 2017. Performance in each year exceeded the demographic figure, except for 2014 lending performance, which was below both the demographic and aggregate figures.

Refinance

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 7.9% by number and 2.6% by dollar, was comparable to the aggregate lending data, at 8.0% by number and 3.1% by dollar; however, performance was below the demographic figure of 24.6%. The bank's lending to moderate-income borrowers, at 4.8% by number and 2.1% by dollar, was below both the aggregate lending data at 15.4% by number and 7.7% by dollar, and also below the demographic figure, at 15.6%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. Lending to low-income borrowers in each year was below the aggregate data lending and significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 exceeded the 2018 performance. The bank's lending was comparable to the aggregate lending data, and the demographic figure, except for 2015, which fell below both.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 12.1% by number and 3.8% by dollar was above the aggregate lending data, at 5.3% by number and 2.2% by dollar, while it fell below the demographic figure, at 24.6%. The bank's lending to moderate-income borrowers, at 12.1% by number and 4.0% by dollar, was comparable to the aggregate lending data, at 12.3% by number and 7.1% by dollar and by number was slightly below the demographic figure, at 15.6%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. Lending to low-income borrowers exceeded aggregate lending and the demographic

figure for 2017; however, the bank did not originate any home improvement loans in 2014-2016 to low-income borrowers. The bank's lending to moderate-income borrowers in 2014-2017 was also below the 2018 performance. Lending to moderate-income borrowers was comparable to the aggregate data lending and the demographic figure for 2017; however, the bank did not originate any home improvement loans to moderate-income borrowers in 2014-2016.

Small Business

The distribution of borrowers reflected, given the product lines offered, adequate penetration among businesses of different sizes. In 2018, the bank originated 49.5% of loans by number and 18.8% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending slightly exceeded aggregate lending data by number, at 45.4% and was below aggregate lending of 32.8% by dollar. Performance was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1MM or less, at 91.1%. While the bank's loan volume was significantly below the demographic figure, the bank originated 59.2% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was comparable to the 2018 lending. Lending was comparable to the aggregate lending data in 2016 and below aggregate lending data in 2014, 2015, and 2017. Performance in each year fell significantly below the demographic figure.

Community Development Lending

M&T was a leader in making community development loans in MSA 14860 (Bridgeport-Stamford-Norwalk, CT). The bank made 27 loans, totaling $157.9 million. M&T ranked first out of four similarly situated banks comparing annualized community development lending deposits within the assessment area. Performance, by dollar, within the MSA was directed at revitalization and stabilization of LMI geographies with 36.2%, affordable housing with 33.1%, and community service initiatives with 30.7% of all community development activity in the assessment area. In addition, loans made outside of the assessment area that benefited the broader statewide or regional area including the assessment area were considered, which included $186.7 million, primarily targeted to community service initiatives.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	12	52,312
Community Services	12	48,518
Revitalize and Stabilize	3	57,100
Total	**27**	**$157,930**

Community development loans included:

- A $40.0 million construction loan for the residential redevelopment of a brownfield site in a moderate-income tract.

- A $13.0 million term loan for the expansion and renovation of a skilled nursing facility serving low- and moderate-income patients.

- A $500,000 line of credit for working capital to a federally qualified health center in a moderate-income tract, serving primarily low- and moderate-income individuals.

INVESTMENT TEST

M&T's performance in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) is based on the following summary. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, but rarely in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 31 qualified investments totaling $37.3 million, in the State of Connecticut. Investments in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) consisted of $8.5 million during the current period and $7.9 million outstanding from the prior period. When compared to three similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked second. In addition, the bank made 6 community development investments outside of its assessment area that benefited the broader statewide and regional area including the assessment area.

During the evaluation period, five new qualified investments were made; however, four were purchases of MBS, which are viewed as less complex investments.

Qualified Community Development Investments by Purpose
October 1, 2014 –December 31, 2019

Area	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 14860 (Bridgeport-Stamford-Norwalk, CT) - New	5	8,468	0	0	0	0	0	0	5	8,468
MSA 14860 (Bridgeport-Stamford-Norwalk. CT) - Prior Period	20	7,850	0	0	0	0	0	0	20	7,850
Broader Statewide Regional Area	5	1,016	0	0	1	20,000	0	0	6	21,016
Total	30	17,334	0	0	1	20,000	0	0	31	37,334

The following are examples of qualified investments that met critical needs in the assessment area:

- The bank made one LIHTC investment for $6.1 million supporting a 45-unit new construction development for families earning less than 60% of AMI.

- Prior period investments included mortgage backed securities that benefited the assessment area in response to the need for affordable housing, as well as one LIHTC investment for affordable housing

In addition to the qualified investments, the bank made two grants or donations, totaling $7,500 during the evaluation period benefiting community service activities.

SERVICE TEST

M&T's performance under the service test in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) is rated Low Satisfactory and is based on delivery systems that were unreasonably inaccessible to a portion of the bank's geographies and individuals of different income levels, changes in branch locations did not adversely affect accessibility of the bank's delivery systems particularly in LMI geographies and/or LMI individuals, and services did not vary in a way that inconvenienced its assessment area particularly LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

Retail Services

M&T's delivery systems were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in this assessment area. M&T operated nine branches in this assessment area, one (11.1%) of which was located in a moderate-income area and none were located in low-income areas. This compares unfavorably to the 12.6% of the MSA's population residing in low-income areas and 20.6% of the population residing in moderate-income areas.

Alternative delivery systems did not enhance the bank's performance in the assessment area. M&T had no off-site ATM locations in the assessment area.

Changes in branch locations generally did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open nor close a branch within the assessment area.

Hours and services did not vary in a way that inconvenienced its assessment area particularly LMI geographies and/or LMI individuals. All nine of the branches located in the MSA had extended and Saturday hours.

Community Development Services

M&T provided a relatively high level of community development services during the evaluation period in Connecticut. The table reflects the number and type of services provided by the bank. Management and staff served on the board of directors for 18 nonprofit and community-based organizations located within the State of Connecticut.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	444
Technical Assistance	0
Small Business Seminars	0
Board Participation	18
Total	**462**

STATE OF DELAWARE

CRA RATING FOR DELAWARE[8]: SATISFACTORY

The Lending test is rated: High Satisfactory

The Investment test is rated: High Satisfactory

The Service test is rated: High Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the bank's assessment areas.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and very small businesses.
- Made a relatively high level of community development loans.

Investment Test:

- Made a significant level of qualified investments and grants particularly those not routinely provided by investors, occasionally in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.
- Exhibited good responsiveness to credit and community development needs.

[8] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

Service Test:

- Delivery systems were readily accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services were tailored to the conveniences and needs of its assessment areas particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

SCOPE OF EXAMINATION

The evaluation of M&T's activities in the State of Delaware consisted of a full-scope review of MSA 20100 (Dover, DE). Activities within the State of Delaware were made entirely within MSA 20100 (Dover, DE). As shown in Exhibit I, activities in the State of Delaware made up less than 1.0% of the bank's deposits, less than 1.0% of branches, and less than 1.0% of the bank's loans. The assessment area was evaluated under full-scope procedures as it is the only assessment area in the State of Delaware.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DELAWARE

As of December 31, 2018, M&T operated five branches in the State of Delaware, three of which were in LMI-income census tracts in MSA 20100 (Dover, DE). The branches offered a full range of products. This competitive market had 11 banks operating 36 retail branches. M&T's primary competitors are PNC Bank N.A., Wells Fargo Bank N.A., Citizens Bank N.A., and T.D. Bank N.A.

As of June 30, 2018, M&T branches held approximately $537 million or 0.6% of the bank's deposits. M&T ranked 1st in the assessment area with 26.6% of the retail deposit market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

Conclusions regarding M&T's performance in the State of Delaware with respect to the lending, investment, and service tests were solely based on the performance in MSA 20100 Dover, DE. M&T's performance under the lending test, investment test and service test are rated High Satisfactory. Specific comments regarding the lending, investment, and service tests are discussed below.

METROPOLITAN AREA

(FULL REVIEW)

MSA 20100 (DOVER, DE)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 20100 (DOVER, DE)

As of December 31, 2018, M&T operated five branches located in MSA 20100 (Dover, DE) Assessment Area, which represented 100.0% of the bank's retail branches in the state. Three of the branches were located in LMI census tracts. The bank was ranked 1st in deposit market share in the assessment area with approximately $537 million in deposits, which was 26.6% of the retail deposit market, as of June 30, 2018. There were 11 banks operating 36 retail branches in the assessment area. M&T's primary competitors in the assessment area were: PNC Bank N.A., Wells Fargo Bank N.A., Citizens Bank N.A., and TD Bank N.A.

Community Contact

As part of the evaluation process, examiners interviewed a contact with an economic development corporation whose primary purpose is to promote business development to assist in identifying credit needs. The contact indicated there are many small businesses in the area and that there is a need for microloans. In addition, the contact noted a need for financial education and training programs for the area's small businesses. The contact indicated that both regional and local banks are meeting the credit needs of the community and that financial institutions are very involved in the community.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 20100 (Dover, DE) consists of Kent County, whose principal city is Dover. M&T's assessment area incorporates the entirety of MSA 20100 (Dover, DE). According to the 2015 American Community Survey (ACS), the assessment area's population totaled 169,509.

Of the 33 census tracts in the assessment area, 1 or 3.0%, were low-income, 6 or 18.2% were moderate-income, 21 or 63.6% were middle-income, 4 or 12.1% were upper-income and 1 or 3.0% were of unknown income.

Income Characteristics

In 2018 the MSA 20100 (Dover, DE) assessment area had 42,277 families, of which 21.6% (9.9% of which were below the poverty level) were considered low-income and 16.6% were moderate-income, 21.7% were middle-income, and 40.1% were upper-income. The FFIEC median family incomes for the assessment area and the State of Delaware as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$60,949	$64,252
State of Delaware	$69,182	$72,993

Housing Characteristics

In 2018, the 2015 ACS Reports showed that MSA 20100 (Dover, DE) had 67,315 housing units, of which 62.7% were owner-occupied and 27.3% were rental units. Of the available owner-occupied units, 12.2% were in LMI areas. In low-income census tracts, 60.4% of the housing units were rental units, 9.6% vacant, and 30.0% were owner-occupied. In moderate-income census tracts, 54.8% of the housing units were either rental or vacant, and 45.2% were owner-occupied.

The median age of housing stock in the assessment area was 25 years old, with 9.2% of the stock built before 1950. The median age of housing stock was 61 years in low-income tracts and 32 years in moderate-income tracts which indicated. According to the 2015 ACS, the median housing value in the assessment area was $200,465, with an affordability ratio of 27.4. The median gross rent in the assessment area was $984 per month. Within the assessment area, 50.7% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$207,500	25.6	$200,500	27.4	$916	$985	7.5%
State of Delaware	$242,300	23.8	$231,500	26.1	$938	$1,018	8.5%

Labor, Employment and Economic Characteristics

Dover, the second largest city in the state, is a center of government, commerce, and industry for Central Delaware. Long involved in agricultural trade, the city is home to Kraft Foods and Procter

& Gamble facilities. Kraft Foods produces gelatin, puddings desserts, rice, and other food items at its 121-acre site. Procter & Gamble's Dover plant produces disposable wet wipe paper products.

Dover Air Force Base has a substantial impact on the local economy contributing more than $331 million per year to the economy. The base operates the largest aerial port facility on the East Coast and serves as a focal point for military cargo movement to Europe and the Middle East. Its mechanized-computerized cargo handling arrangement makes possible the processing of up to 1,200 tons of cargo during a 24-hour period.

Tourism is a growing industry in Dover and Kent County. Because of the absence of sales tax, visitors from nearby states such as New York and New Jersey have visited more frequently. In addition, local NASCAR races, as well as related industries such as the restaurants and hotel/motel businesses, have a significant impact on Dover's economy.

According to D&B data, the assessment area had a total of 7,441 businesses in 2018, of which 6,869 (92.3%) were small businesses with GAR of $1 million or less.

Unemployment rates dropped significantly from 2014 to 2018, evidencing improving economic conditions.

U.S. Department of Labor **Annual Unemployment Rates**					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 20100 (Dover, DE)	6.4	5.4	4.9	4.9	4.2
Kent County	6.4	5.4	4.9	4.9	4.2
State of Delaware	5.7	5.4	4.5	4.5	3.8

Additional performance context data for this assessment area is provided in the following Assessment Area Demographics table:

Assessment Area Demographics

Assessment Area: MSA 20100 (Dover, DE) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3	489	1.2	189	38.7	9,119	21.6
Moderate-income	6	18.2	6,314	14.9	839	13.3	7,026	16.6
Middle-income	21	63.6	29,632	70.1	2,812	9.5	9,181	21.7
Upper-income	4	12.1	5,842	13.8	360	6.2	16,951	40.1
Unknown-income	1	3	0	0	0	0	0	0
Total Assessment Area	**33**	**100.0**	**42,277**	**100.0**	**4,200**	**9.9**	**42,277**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,051	315	0.7	30	635	60.4	101	9.6
Moderate-income	10,742	4,854	11.5	45.2	4,902	45.6	986	9.2
Middle-income	46,230	30,616	72.6	66.2	10,880	23.5	4,734	10.2
Upper-income	9,292	6,400	15.2	68.9	1,969	21.2	923	9.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**67,315**	**42,185**	**100.0**	**62.7**	**18,386**	**27.3**	**6,744**	**10.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	795	10.7	702	10.2	57	12.3	36	33
Moderate-income	1,032	13.9	926	13.5	90	19.4	16	14.7
Middle-income	4,703	63.2	4,378	63.7	274	59.2	51	46.8
Upper-income	911	12.2	863	12.6	42	9.1	6	5.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**7,441**	**100.0**	**6,869**	**100.0**	**463**	**100.0**	**109**	**100.0**
	Percentage of Total Businesses:			**92.3**		**6.2**		**1.5**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 20100 (DOVER, DE)

LENDING TEST

M&T's performance in MSA 20100 (Dover, DE) is based on the following summary. M&T's lending levels reflected good responsiveness to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made a relatively high level of community development loans.

Greater weight was given to the analysis of small business lending performance followed by home purchase and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multifamily lending was only considered in the evaluation of community

development lending and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

Lending Activity

M&T's lending levels reflected good responsiveness to the assessment area credit needs in MSA 20100 (Dover, DE). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered adequate while small business lending was good. For the five-year evaluation period, lending activity totaled 846 loans consisting of 176 home purchase, 171 refinance, 181 home improvement and 318 small business loans. Lending activity increased on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 317 loans consisting of 71 home purchase, 118 refinance, 66 home improvement, and 62 small business loans. Annualized HMDA and small business volume for the evaluation period increased 6.8% overall compared to the previous evaluation period. This annualized increase was driven by increases in home improvement (9.7%) and small business (105.2%) lending. Home purchase (-0.8%) and refinance (-42.0%) lending decreased, however. Analysis of the aggregate data for the evaluation period indicated an annualized increase in lending volume for the aggregate overall.

Over the review period, M&T's market share of deposits declined slightly while overall lending market share slightly increased. In 2018, M&T had a deposit market share of 26.6%, and lending market shares of 0.9% in home purchase, 3.8% in refinance lending, 16.2% in home improvement and 3.1% in small business lending. In comparison, the deposit market share at the beginning of the review period in 2014 was 27.8%, and lending market shares were 1.2% in home purchase lending, 1.0% in refinance lending, 10.0% in home improvement lending, and 2.5% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration in MSA 20100 (Dover, DE). This conclusion is based primarily on M&T's performance in moderate-income tracts as there were no low-income tracts in the assessment area in 2014-2016 and there was only one low-income tract in the assessment area in 2017 and 2018. Opportunities for lending in the low-income tract were limited, as less than 1% of owner-occupied housing units were located in the low-income tract. Lending penetration in moderate-income tracts for refinance loans was excellent and home purchase, home improvement and small business lending was good.

Analysis of Lending Gaps

The overall penetration of different income tracts in 2018 was 93.9% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, there was only one low-income tract in the assessment area and the bank did not make a loan in this tract.

Penetration in moderate-income census tracts was 83.3% when considering HMDA and small business lending. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending was generally comparable as the bank penetrated 90.9% of all census tracts in 2017, 81.8% in 2016, 93.9% in 2015 and 93.9% in 2014.

MSA 20100 (Dover, DE)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	1	0	0.0%
Moderate	6	1	83.3%
Middle	21	0	100.0%
Upper	4	0	100.0%
Unknown	1	1	0.0%
Total Tracts	33	2	93.9%
2017			
Low	1	0	0.0%
Moderate	6	1	83.3%
Middle	21	1	95.2%
Upper	4	0	100.0%
Unknown	1	1	0.0%
Total Tracts	33	3	90.9%
2016			
Low	0	0	NA
Moderate	5	0	100.0%
Middle	22	4	81.8%
Upper	5	1	80.0%
Unknown	1	1	0.0%
Total Tracts	33	6	81.8%
2015			
Low	0	0	NA
Moderate	5	0	100.0%
Middle	22	1	95.5%
Upper	5	0	100.0%
Unknown	1	1	0.0%
Total Tracts	33	2	93.9%
2014			

Low	0	0	NA
Moderate	5	0	100.0%
Middle	22	1	95.5%
Upper	5	0	100.0%
Unknown	1	1	0.0%
Total Tracts	33	2	93.9%

Home Purchase

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area. In 2018, the bank did not make a loan in the low-income tract and made 11.1% by number and 9.2% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending was comparable to the 11.5% of owner-occupied housing units located in moderate-income census tracts, but performance was slightly below the aggregate, which made 12.4% by number and 11.1% by dollar volume in moderate-income census tracts.

Home purchase lending in 2014-2017 was consistent overall with 2018's performance. In 2014, 2015, and 2016, lending in low income tracts was below the demographic and aggregate figures, while in 2017 performance was above both the demographic and the aggregate figures. In moderate-income tracts in 2014, 2015, and 2017, performance was comparable to 2018 as the bank's lending was comparable to the demographic figure and exceeded the aggregate lending data. In 2016, the bank's performance was below both the demographic figure and aggregate lending.

Refinance

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area. In 2018, the bank made only one refinance loan in the low-income tract and made 11.5% by number and 10.3% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number, was comparable to the 11.5% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate lending, which made 8.9% by number and 9.8% by dollar in moderate-income census tracts.

The bank's refinance lending in moderate-income census tracts in 2014-2017 overall was consistent with 2018's excellent performance. Refinance lending in 2016 and 2017 exceeded the demographic and aggregate while refinance lending in 2015 was below the demographic and the aggregate. Refinance lending in 2014 was below the demographic but comparable to the aggregate. The bank did not make a refinance loan in the low-income tract in 2017.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made one home improvement loan in the low-income census tract and made 8.9% by number and 4.1% by dollar volume of home improvement loans in moderate-income census tracts. The bank's home improvement lending was below the 11.5% of owner-occupied housing units located in moderate-income census tracts but, by number, was comparable to the aggregate, which made 8.4% by number in moderate-income census tracts. M&T's home improvement lending in moderate-income tracts by dollar amount volume was below the aggregate, which made 6.0% by dollar in moderate-income census tracts.

The bank's home improvement lending in 2014-2017 was consistent overall with 2018 performance, as performance in 2014, 2016, and 2017 was comparable or exceeded the demographic and aggregate. However, the bank did not make any home improvement loans in 2015. The bank made did not make any home improvement loans in the low-income census tract in 2017.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018 the bank did not make any small business loans in the low-income census tract, while 10.7% of businesses were located in the tract. In 2018, the bank made 17.4% by number and 26.3% by dollar of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income census tracts exceeded the demographic of the assessment area where 13.9% of businesses were located and exceeded the aggregate, which made 12.8% by number and 18.3% by dollar in moderate-income census tracts.

The bank's small business lending in 2014-2017 was below 2018's performance. In 2015 and 2016, small business lending was below the aggregate and the demographic while performance in 2017 was consistent with 2018, exceeding the demographic and aggregate. Performance in 2014 was below the demographic but exceeded the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in MSA 20100 (Dover, DE). Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of $1 million or less was excellent.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-

income borrowers, at 5.6% by number and 3.7% by dollar, was comparable to the aggregate lending data, at 5.5% by number and 3.4% by dollar, while it fell below the 21.6% of low-income families residing in the assessment area. Lending to moderate-income borrowers, at 33.3% by number and 26.5% by dollar, exceeded both the aggregate lending data, at 21.5% by number and 18.3% by dollar, as well as the 16.6% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate lending data but was below the demographic figure, with the exception of 2014 when the bank did not make a home purchase loan to a low-income borrower. The bank's lending to moderate-income borrowers in 2014-2017 was consistent 2018 performance. The bank's lending in 2015 and 2017 was above both the demographic and aggregate figures, while 2014 was below the demographic and aggregate figures. In 2016, performance was comparable to both the demographic and aggregate figures.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, at 15.4% by number and 14.6% by dollar, was above the aggregate lending data, at 10.3% by number and 6.7% by dollar, while it fell below the percentage of low-income families residing in the assessment area, at 21.6%. Lending to moderate-income borrowers, at 23.1% by number and 17.0% by dollar, was comparable to the aggregate lending data, at 21.1% by number and 17.5% by dollar, and above the demographic figure, at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. The bank's lending to low-income borrowers was comparable to the aggregate lending data in 2015 and 2016, and below the aggregate lending data in 2017 when the bank did not make a refinance loan to a low-income borrower, but was significantly above the aggregate lending data in 2014. In each year, the bank's performance in low-income tracts fell below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was slightly above the 2018 performance. In 2015, 2016 and 2017, the bank's lending was above the aggregate lending data and comparable to the demographic figure. In 2014, performance was below both the aggregate lending data and demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, at 14.3% by number and 8.0% by dollar, exceeded the aggregate lending data, at 7.2% by number and 5.8% by dollar. Performance was below the percentage of low-income families residing in the assessment area at 21.6%. Lending to moderate-income borrowers, at 23.2% by number and 16.2% by dollar, was above both the aggregate lending data, at 17.6% by

number and 12.3% by dollar, and the number of moderate-income families in the assessment area, at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. In each year the bank's lending to low-income borrowers exceeded aggregate lending data but was below the demographic figure, with the exception of 2016 when the bank did not make a home improvement loan to a low-income borrower. The bank's lending to moderate-income borrowers in 2014-2017 was also consistent with 2018 performance. In each year, the bank's lending to moderate-income borrowers exceeded both the aggregate lending data and the demographic figure, with the exception of 2016 when performance was below both aggregate lending data and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, excellent penetration among businesses of different sizes. In 2018, the bank originated 68.5% by number and 28.4% by dollar of loans by number to businesses with gross annual revenues of $1 million of less. The bank's lending was significantly above aggregate lending data, at 46.4% by number and 35.5% by dollar, but was below the percentage of businesses in the assessment area with gross annual revenues of $1 million or less, at 92.3%. However, the bank did originate 64.1% of their loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was comparable to 2018 lending. The bank's lending to small businesses exceeded the aggregate lending but fell below the demographic figure.

Community Development Lending

M&T made a relatively high level of community development loans in MSA 20100 (Dover, DE), with seven loan originations totaling $21.7 million. M&T ranked 3rd out of five similarly-situated banks when comparing annualized community development loans to deposits within the assessment area.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	1	350
Community Services	1	1,375
Economic Development	2	1,161
Revitalize and Stabilize	3	18,827
Total	**7**	**$21,713**

Community development activity in the assessment area was directed toward revitalization and stabilization efforts, which made up 86.7% of community development lending in the assessment area.

Examples of community development loans in this assessment area were:

- A loan to support affordable housing grants for construction of 14 homes to benefit LMI buyers.

- A loan that supported construction of healthcare facility, tied to Delaware Economic Development Office, creating jobs that benefit LMI communities.

INVESTMENT TEST

M&T's performance in MSA 20100 (Dover, DE) under the investment test is rated High Satisfactory and is based on the following summary. The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited good responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made eight qualified investments totaling $13.1 million, in the State of Delaware. Investments in MSA 20100 (Dover, DE) consisted of $11.8 million during the current period and $358 thousand outstanding from the prior period. When compared to five similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked third. In addition, the bank made one investment of $963 thousand outside of its assessment area that benefited the broader statewide regional area including the assessment area.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Geographic Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 20100 (Dover, DE) - New	2	11,790	0	0	0	0	0	0	2	11,790
MSA 20100 (Dover. DE) - Prior Period	5	358	0	0	0	0	0	0	5	358
Broader Statewide or Regional Area	1	963	0	0	0	0	0	0	1	963
Total	8	13,111	0	0	0	0	0	0	8	13,111

The following are examples of qualified investments that met critical needs in the assessment area:

- A $10.5 million investment in LIHTC for a 78-unit rehabilitation project with 57 units qualifying for project-based Section 8 subsidies with set asides for tenants with incomes at or below the 30%, 50% and 60% of AMI levels.

- A $1.3 million investment in LIHTC that supports the acquisition and rehabilitation of 100 affordable housing units reserved for LMI individuals.

In addition to the qualified investments, the bank made 99 grants or donations totaling $626,800 during the evaluation period, as illustrated in the table below. The grants and donations were comprised of funds primarily for community service activities. Affordable housing and economic development activities also benefited.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

Area	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
MSA 20100 (Dover, DE)	17	136,000	75	479,450	7	11,300	0	0	99	626,800

SERVICE TEST

M&T's performance under the service test in (MSA 20100 Dover, DE) is rated High Satisfactory based on the following: delivery systems that were readily accessible to the bank's geographies and individuals of different income levels, changes in branch locations that did not adversely affect accessibility of the bank's delivery systems particularly to LMI geographies and LMI individuals, and services that were tailored to the convenience and needs of the assessment area particularly LMI geographies and/or LMI individuals. In addition, the bank provided an adequate level of community development services.

Retail Services

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated five branches in this assessment area, one branch (20.0%) was in a low-income area and two branches (40.0%) were in moderate-income areas. This compares favorably to the 1.3% of the MSA's population residing in low-income areas and 15.3% of the population residing in moderate-income areas.

Alternative delivery systems did not enhance the bank's performance in this assessment area. M&T had ten off-site ATM locations in the assessment area, two (20.0%) of which were in moderate-income tracts.

Changes in branch locations generally did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed one branch in a middle-income tract in this assessment area.

Services were tailored to the convenience and needs of its assessment area, particularly LMI geographies and/or LMI individuals. All five of the branches located in the MSA had extended or Saturday hours.

Community Development Services

M&T provided an adequate level of community development services in MSA 20100 (Dover, DE). The table shows the number and type of services provided during the evaluation period. The bank's management and staff served on the board of directors for 13 nonprofit and community-based organizations in this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	113
Technical Assistance	1
Small Business Seminars	0
Board Participation	13
Total	**127**

STATE OF FLORIDA

CRA RATING FOR FLORIDA: SATISFACTORY

The Lending test is rated: Low Satisfactory

The Investment test is rated: Low Satisfactory

The Service test is rated: Low Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout the bank's assessment areas.
- The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes.
- Exhibited a poor record of serving the credit needs of low-income individuals and very small businesses.
- Made a relatively high level of community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- An adequate level of qualified community development investments and grants particularly those not routinely provided by investors, rarely in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.
- Exhibited adequate responsiveness to credit and community development needs.

Service Test:

- Delivery systems were unreasonably inaccessible to geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals.
- Services varied in a way that inconvenienced its assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of community development services.

SCOPE OF EXAMINATION

The evaluation of M&T's activities in the State of Florida consisted of a full-scope review of MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). Additionally, M&T had assessment areas in Florida for MSA 38940 (Port St. Lucie, FL) and MSA 42680 (Sebastian-Vero Beach, FL), as both assessment areas contain deposit taking ATMs. Performance ratings for the State of Florida were based solely on the evaluation conducted of MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area due to the deposit concentrations, lending volumes, and branch office network. Limited scope reviews were conducted for MSA 38940 (Port St. Lucie, FL) and MSA 42680 (Sebastian-Vero Beach, FL)

As shown in Exhibit I, this assessment area has a very small proportion of M&T's loans and deposits.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

As of December 31, 2018, M&T operated one branch in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). The branch's activities represented less than 1.0% of the bank's deposits, branches, and the bank's loans. M&T's presence within the MD was limited as the bank ranked 38 out of 53 banks in terms of deposit market share, as reported by the FDIC as of June 30, 2018.

Within the bank's State of Florida assessment area, this assessment area contained the only branch, 100% of deposits in the State of Florida, and 90.2% of all lending in the State of Florida.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

M&T's lending test performance is rated Low Satisfactory based on performance in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). In MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) the bank's lending levels reflected adequate responsiveness to assessment area

credit needs, the geographic distribution of loans reflected adequate penetration throughout the bank's assessment area, the distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes, and the bank provided a relatively high level of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). The conclusion is based on the number and dollar amount of HMDA-related and small business loans originated and purchased in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area. Lending activity was compared to the previous evaluation and aggregate lending activity, and market share trends of deposits and lending were evaluated.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout the State of Florida based on performance in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area. There were significant lending gaps in the assessment area; however, considering M&T's limited presence in the assessment area, the bank penetrated an adequate number of census tracts. For details, refer to the Geographic Distribution section of the full-scope assessment area.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The overall distribution of loans among borrowers of different income levels and businesses of different sizes in the State of Florida was poor, based on poor performance in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area.

Community Development Lending

M&T made a relatively high level of community development loans in the State of Florida. During the evaluation period, M&T originated eleven community development loans for $117.1 million. Of the eleven loans, four for $63.6 million were in M&T's MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area and one for $1.4 million was in the MSA 38940 (Port St Lucie, FL). The remaining six loans were outside the assessment areas but benefited the broader statewide or regional area including the assessment areas and totaled $52.1 million.

INVESTMENT TEST

M&T's performance under the investment test is rated Low Satisfactory in the State of Florida based on performance in its MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area.

In the state, M&T had an adequate level of qualified community development investments and grants particularly those not routinely provided by investors, rarely in a leadership position, made occasional use of innovative and/or complex investments to support community development initiatives and exhibited adequate responsiveness to credit and community development needs.

M&T made one new qualified investment, totaling $6.0 million, in the State of Florida. In addition, M&T had $2.0 million in prior period investments.

SERVICE TEST

M&T's performance under the service test in the State of Florida MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) is rated Low Satisfactory based on delivery systems that were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations that did not adversely affect the accessibility of its delivery systems particularly to LMI geographies and/or individuals, services that varied in a way that inconvenienced its assessment area, particularly LMI geographies and/or LMI Individuals. M&T provided an adequate level of community development services.

Summary of Key Assessment Area Data: Florida				
	MD 48424	MSA 38940	MSA 42680	Florida Totals
Total Population[4]	1,378,806	151,586	142,866	1,673,258
Population % of AA population	82.4%	9.1%	8.5%	100.0%
Families	332,725	38,625	36,247	407,597
Families % of AA families	81.6%	9.5%	8.9%	100.0%
Total Census Tracts[4]	338	36	31	405
Tracts % AA tracts	83.5%	8.9%	7.7%	100.0%
LMI tracts	120	5	6	131
LMI tracts % all AA LMI tracts	91.6%	3.8%	4.6%	100.0%
Total Owner-Occupied Units[4]	369,521	46,795	43,168	459,484
Units % of AA units	80.4%	10.2%	9.4%	100.0%
Business Establishments[5]	128,324	14,008	12,002	154,334
Bus. est. % AA bus. est.	83.1%	9.1%	7.8%	100.0%
Number of Branches[1]	1	0	0	1
Branches % all branches	100.0%	NA	NA	100.0%
Branches in LMI tracts	0	0	0	0
LMI branches % AA LMI branches	NA	NA	NA	NA
Branch Deposits ($'000s)[2]	15	NA	NA	15
Deposits % AA deposits	100.0%	0%	0%	100.0%
Deposit Market Share (%)/ Rank in Mkt.	.11% 38/53	NA	NA	.11% 38/53
Home Purchase Originations[3]	25	1	1	27
HP originations % AA orig.	92.0%	3.7%	3.7%	100.0%
Refinance Originations[3]	7	1	0	8
Refi orig. % AA orig.	87.5%	12.0%	0.0%	100.0%
Home Improvement Originations[3]	5	0	0	5
Home Improvement orig. % AA orig.	100%	0%	0%	100%
Small Business Originations[3]	9	0	2	11
SB orig. % AA orig.	81.8%	0.0%	18.2%	100.0%
Combined Loan Totals	46	2	3	51
% of AA Orig.	90.2%	3.9%	5.9%	100.0%

(1) Branch numbers are as of 12/31/2018. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/2018. (3) Originations are loans reported under HMDA or CRA small business reporting for 2018. (4) Demographic information was obtained from the 2015 ACS. (5) Business establishments information was reported by D&B for 2018.

METROPOLITAN AREA

(FULL REVIEW)

MD 48424 (WEST PALM BEACH-BOCA RATON-DELRAY BEACH, FL)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD 48424 (WEST PALM BEACH-BOCA RATON-DELRAY BEACH, FL)

During the evaluation period, M&T operated one branch in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). Based on FDIC deposit data as of June 30, 2018, M&T held $15 million in deposits in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL), which represented less than 1.0% of the bank's total deposits and total deposit market share of the assessment area. M&T's total combined HMDA-related and small business originations in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) represented less than 1.0% of the bank's overall loan totals.

Community Contact

In the Florida assessment area, one community contact was conducted with a non-profit organization that provides home ownership services to assist potential homebuyers in reaching their homeownership goals. Services include homebuyer education, homeowner counseling, foreclosure counseling, housing development, lending, and community outreach. The contact indicated that the south Florida area has a need for more affordable housing. The market is more geared for single family homes rather than rental properties. The condominium market is also limited. According to the contact, a recent report from two universities stated that, relative to income, Florida is one of the least affordable states for housing. The contact noted residents have left the Miami area for Orlando and South Carolina where home prices are less expensive. The contact indicated that banks need to do a better job in foreclosure counseling.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) consisted of Palm Beach County and is the MD in its entirety. In 2018, the assessment area's population totaled 1,378,806. The assessment area contained 82.4% of the bank's State of Florida combined assessment area population.

In 2018, of the 338 census tracts in the assessment area, 26 or 7.7%, were low-income, 94 or 27.8% were moderate-income, 92 or 27.2% were middle-income, 115 or 34.0% were upper-income and 11 or 3.3% were of unknown income.

Income Characteristics

In 2018, the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area had 332,725 families, of which 22.8% (10.5% of which were below the poverty level) were considered low-income, 17.3% were moderate-income, 17.8% were middle-income, and 42.1% were upper-income. The FFIEC median family incomes for the assessment area and State of Florida as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$64,445	$65,914
State of Florida	$57204	$57,504

Housing Characteristics

In 2018, the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) AA had 671,317 housing units, of which 55.0% were owner-occupied and 24.6% were rental units. Of the available owner-occupied units, 26.4% were located in LMI areas. In low-income census tracts, 50.6% of the housing units were rental units, 20.4% were vacant, and 29.0% were owner-occupied. In moderate-income census tracts, 53.3% of the housing units were either rental or vacant, and 46.7% were owner-occupied.

The median age of housing stock in the assessment area was 31 years old, with 3.1% of the stock built before 1950. The median age of housing stock was 43 years in low-income tracts and 42 years in moderate-income tracts.

The median housing value in the assessment area was $204,700, with an affordability ratio of 26.1. The median gross rent in the assessment area was $1,169 per month. Within the assessment area, 56.3% of all renters had rental costs that exceeded 30% of their incomes which may make it difficult to save for a down payment for a home purchase.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$261,900	20.3	$204,700	26.1	$1,129	$1,169	3.5%
State of Florida	$205,600	23.2	$159,000	29.9	$957	$1,002	4.7%

Labor, Employment and Economic Characteristics

According to the Palm Beach County Business Development Board, Palm Beach County has a growing economy. The county is one of the wealthiest in the nation with per capita personal income levels nearly 50% higher than state and national averages. The county's diversifying economic base, sound financial position, luxury tourism, technology, manufacturing, and agriculture all contribute to the positive outlook.

According to D&B data, the assessment area had a total of 128,324 businesses in 2018, of which 119,764 (93.3%) were small businesses with GAR of $1 million or less. Unemployment rates improved significantly over the review period, indicating improving economic conditions and potential lending opportunities in the latter portion of the review period.

U.S. Department of Labor Annual Unemployment Rates					
Geographic Area	**2014**	**2015**	**2016**	**2017**	**2018**
Assessment Area	5.9	5.1	4.7	4.2	3.6
State of Florida	6.3	5.5	4.8	4.2	3.6

Additional performance context data for this assessment area is provided in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) Assessment Area Demographics table below.

Assessment Area Demographics

Assessment Area: MD 48424 (West Palm Beach, FL) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	26	7.7	19,292	5.8	7,117	36.9	75,778	22.8
Moderate-income	94	27.8	82,482	24.8	14,460	17.5	57,664	17.3
Middle-income	92	27.2	104,384	31.4	7,979	7.6	59,302	17.8
Upper-income	115	34	125,809	37.8	5,343	4.2	139,981	42.1
Unknown-income	11	3.3	758	0.2	99	13.1	0	0
Total Assessment Area	**338**	**100.0**	**332,725**	**100.0**	**34,998**	**10.5**	**332,725**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	40,022	11,598	3.1	29	20,247	50.6	8,177	20.4
Moderate-income	184,776	86,275	23.3	46.7	59,215	32	39,286	21.3
Middle-income	204,366	120,910	32.7	59.2	49,258	24.1	34,198	16.7
Upper-income	240,165	149,887	40.6	62.4	35,765	14.9	54,513	22.7
Unknown-income	1,988	851	0.2	42.8	599	30.1	538	27.1
Total Assessment Area	**671,317**	**369,521**	**100.0**	**55.0**	**165,084**	**24.6**	**136,712**	**20.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6,741	5.3	6,064	5.1	600	8.6	77	4.8
Moderate-income	26,724	20.8	24,927	20.8	1,570	22.6	227	14.1
Middle-income	38,679	30.1	36,503	30.5	1,759	25.3	417	25.8
Upper-income	55,336	43.1	51,536	43	2,925	42.1	875	54.2
Unknown-income	844	0.7	734	0.6	91	1.3	19	1.2
Total Assessment Area	**128,324**	**100.0**	**119,764**	**100.0**	**6,945**	**100.0**	**1,615**	**100.0**
	Percentage of Total Businesses:			**93.3**		**5.4**		**1.3**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 48424 (WEST PALM BEACH-BOCA RATON-DELRAY BEACH, FL)

LENDING TEST

M&T's performance under the lending test in MSA 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) is based on the following summary. Lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected adequate penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different size, and the bank made a relatively high level of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in both HMDA-related and small business lending was considered adequate. For the five-year evaluation period, lending activity totaled 258 loans, consisting of 119 home purchase, 84 refinance, 8 home improvement and 47 small business loans. Lending activity declined 45.1%

on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 188 loans consisting of 52 home purchase, 128 refinance, 1 home improvement, and 7 small business loans. This decrease was driven by decreases in home purchase (-8.5%) and refinance (-73.8%) lending. On an annualized basis, home improvement lending increased (180.0%), as did small business lending (220.0%). Analysis of aggregate activity over the evaluation period indicated an increase in lending volume for the aggregate overall.

M&T's market share trends of deposits and lending were stable overall throughout the review period. In 2018, M&T had a deposit market share of 0.1%, and lending market shares of 0.1% in home purchase, 0.1% in refinance lending, 0.2% in home improvement and <0.1% in small business lending. In comparison, at the beginning of the review period the deposit market share in 2014 was 0.1%, and lending market shares of 0.1% in home purchase lending, 0.1% in refinance lending, 0.0% in home improvement lending, and 0.0% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area. Home improvement lending was not evaluated as volume was insufficient to analyze.

Analysis of Lending Gaps

The overall penetration of different income tracts in 2018 was 11.2% of all census tracts in the assessment area when considering HMDA and small business lending. The bank did not penetrate any low-income census tracts in 2018 when considering HMDA and small business lending. HMDA and small business lending penetration in moderate-income census tracts was 7.4%. Overall penetration of different income levels in 2015, 2016 and 2017 for HMDA and small business lending was comparable to 2018 performance, as the bank penetrated 14.2% of all census tracts in 2017, 14.8% in 2016, 15.4% in 2015, and 8.3% of all census tracts in 2014.

MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	26	26	0.0%
Moderate	94	87	7.4%
Middle	92	80	13.0%
Upper	115	96	16.5%
Unknown	11	11	0.0%
Total Tracts	338	300	11.2%
2017			

Low	26	25	3.8%
Moderate	94	85	9.6%
Middle	92	81	12.0%
Upper	115	89	22.6%
Unknown	11	10	9.1%
Total Tracts	338	290	14.2%
2016			
Low	21	20	4.8%
Moderate	84	78	7.1%
Middle	106	86	18.9%
Upper	118	95	19.5%
Unknown	9	9	0.0%
Total Tracts	338	288	14.8%
2015			
Low	21	21	0.0%
Moderate	84	76	9.5%
Middle	106	84	20.8%
Upper	118	96	18.6%
Unknown	9	9	0.0%
Total Tracts	338	286	15.4%
2014			
Low	21	21	0.0%
Moderate	84	81	3.6%
Middle	106	98	7.5%
Upper	118	101	14.4%
Unknown	9	9	0.0%
Total Tracts	338	310	8.3%

Home Purchase

The geographic distribution of home purchase loans reflected poor penetration throughout the assessment area. In 2018, the bank did not make any home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts was below the 3.1% of owner-occupied housing units located in low-income census tracts and was below the aggregate, which made 2.9% by number and 1.6% by dollar in low-income census tracts. In 2018, the bank made 24.0% by number and 11.8% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts, by number, was

comparable to the 23.4% of owner-occupied housing units located in moderate-income census tracts and was comparable to the aggregate, which made 23.2% by number in moderate-income census tracts. M&T's home purchase lending in moderate-income census tracts by dollar volume was below the aggregate, which made 15.7% by dollar in moderate-income census tracts.

Home purchase lending in 2014-2017 was below 2018's performance. M&T made only one home purchase loan in 2016 and none in 2014, 2015, and 2017 in a low-income census tract while only 1.5% of the aggregate's home purchase lending were in low-income census tracts. In 2014, 2015 and 2016, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate. In 2017, the bank's home purchase lending in moderate-income census tracts was comparable to the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank did not make any refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts was below the 3.1% of owner-occupied housing units located in low-income census tracts. M&T's refinance lending in low-income census tracts was below the aggregate, which made 2.2% by number and 1.4% by dollar in low-income census tracts. In 2018, the bank did not make any refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts was below the 23.4% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 18.1% by number and 11.5% by dollar in moderate-income census tracts.

In 2014-2017, the bank's refinance lending performance in moderate-income census tracts exceeded 2018 performance while performance in low-income census tracts was consistent with 2018's poor performance as the bank made only one loan in a low-income tract in the review period. In 2014 and 2016, refinance lending in moderate-income census tracts was below the demographic but exceeded the aggregate. The bank's refinance lending in moderate-income census tracts in 2015 exceeded both the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2017 was below the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected adequate penetration throughout the assessment area. In 2018, M&T did not make any small business loans in low-income census tracts. The bank's business lending in low-income census tracts was below the demographic of the assessment area where 5.3% of businesses were located and was below the aggregate, which made 5.4% by number and 7.5% by dollar of its small business loans in low-income census tracts. In moderate-income census tracts in 2018, the bank made 44.4% by number and 38.9% by dollar of small business loans in moderate-income census tracts exceeding the demographic of the assessment area where 20.8% of businesses were located. M&T's small business lending in

moderate-income census tracts also exceeded the aggregate, which made 20.2% by number and 20.9% by dollar in moderate-income census tracts.

In 2014-2017, small business lending penetration in LMI census tracts was consistent with 2018 performance. In low-income census tracts from 2014-2017, M&T did not make any small business loans. In moderate-income tracts, small business lending in 2014 was below the demographic and the aggregate. However, in 2015, 2016 and 2017 small business lending in moderate-income census tracts exceeded the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

M&T's distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers was 8.0% by number and 1.0% by dollar and was above the aggregate lending data, at 4.3% by number and 1.9% by dollar. However, home purchase lending was below the demographic figure, at 22.8%. The bank's lending to moderate-income borrowers, at 12.0% by number and 3.3% by dollar, was below the aggregate lending data, at 15.6% by number and 9.4% by dollar, and below the demographic figure, at 17.3%.

M&T's lending to low-income borrowers in 2014-2017 was below the bank's 2018 lending performance. The bank did not originate any home purchase loans to low-income borrowers. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance as the bank's lending was below both the aggregate performance and the demographic figure, except in 2017 lending, which exceeded the aggregate lending data and was comparable to the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels for refinance loans, during the majority of the review period. The bank's 2018 lending to low-income borrowers was 14.3% by number and 7.3% by dollar and exceeded the aggregate lending data, at 7.7% by number and 3.8% by dollar. However, performance was below the demographic figure, at 22.8%. The bank's lending to moderate-income borrowers, at 28.6% by number and 14.5% by dollar, exceeded both the aggregate lending data at 16.5% by number and 9.9% by dollar, and the demographic figure, at 17.3%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. The bank did not originate and home refinance loans during 2014-2017 to low-income borrowers. The bank's lending to moderate-income borrowers in 2014-2017 was below the bank's 2018 performance, as the bank's lending was below both the aggregate lending and demographic figure in each year.

Small Business

The distribution of borrowers reflected, given the product lines offered, poor penetration among businesses of different sizes for small business loans. In 2018, the bank originated one loan, 11.1% of loans by number and 12.6% by dollar, to businesses with gross annual revenues of $1 million of less. The bank's lending was significantly below the aggregate lending data, at 46.1% by number and 31.6% by dollar, and the bank's lending was also significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 93.3%. In addition to the bank's loan volume being significantly below both the aggregate lending data and demographic figure, the bank did not originate any loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014-2017 slightly exceeded 2018 lending. Although the bank's lending was significantly below the demographic figure, in 2014 and 2016, performance exceeded the aggregate lending data. Performance in 2015 was below aggregate lending while 2017 performance was comparable to aggregate lending data. Over the review period the bank made only two loans under $100 thousand, which are typically viewed as more responsive to small business needs.

Community Development Lending

M&T made a relatively high level of community development loans in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) with four loans, totaling $63.6 million. M&T ranked first out of six similarly-situated banks when comparing annualized community development lending to deposits in the assessment area. Performance within the MD was directed towards affordable housing and revitalization initiatives, which represented 59.9% and 40.1% of community development activity, respectively.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	2	38,090
Revitalize and Stabilize	2	25,500
Total	**4**	**$63,590**

Two community development loans were construction loans for a mixed-use development in a low-income tract located in a municipal revitalization zone.

INVESTMENT TEST

M&T's performance in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) is based on the following summary. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made two qualified investments totaling $8.0 million, in the State of Florida, which were in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). The investments consisted of $6.0 million current period and $2.0 million prior period investments for an approximate total of $8.0 million in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL). When compared to six similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked second.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) - New	1	5,998	0	0	0	0	0	0	1	5,998
MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) - Prior Period	0	0	0	0	1	2,005	0	0	1	2,005
Total	1	5,998	0	0	1	2,005	0	0	2	8,003

Examples of the bank's investment activity that served critical needs of the assessment area include:

- A LIHTC investment for 84 units of housing for the elderly with incomes less than 60% of AMI.
- Investment in a pool of SBA qualified investments that benefited the assessment area.

In addition to the qualified investments, the bank made 28 grants or donations totaling $168,500 during the evaluation period, as illustrated in the table below. The grants and donations were comprised of funds primarily for affordable housing and community service activities.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL)	6	69,600	22	98,900	0	0	0	0	28	168,500

SERVICE TEST

M&T's performance under the service test in MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) was rated Low Satisfactory based on delivery systems that were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations that did not adversely affect the accessibility of its delivery systems particularly LMI geographies and/or individuals, services that varied in a way that inconvenienced its assessment area particularly LMI geographies and/or LMI individuals. The bank provided an adequate level of community development services.

Retail Services

M&T's delivery systems were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in this assessment area. M&T operated one branch in this assessment area, which was in a middle-income area. This compared unfavorably to the 7.3% of the MSA's population residing in low-income areas and 27.5% of the population residing in moderate-income areas. However, the branch is adjacent to one moderate-income census tract.

Alternative delivery systems did not enhance the bank's performance in this assessment area group. M&T had one off-site ATM location in the assessment area, which was not located in an LMI area.

Changes in branch locations generally did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

Services varied in a way that inconvenienced its assessment area, particularly LMI geographies and/or LMI individuals. The one branch located in the assessment area was not in an LMI area and did not have early morning, late evening, or Saturday hours.

Community Development Services

M&T provided an adequate level of community development services during the evaluation period due to the bank's participation as board members. While the bank did not provide any community development seminars or other outreach, management and staff served as board members for eight nonprofit and community-based organizations in the MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL) assessment area.

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 38940 (PORT ST. LUCIE, FL)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 38940 (PORT ST. LUCIE, FL)

A limited evaluation of M&T's performance in MSA 38940 (Port St. Lucie, FL) was conducted. M&T's assessment area consisted of all of Martin County, which is a portion of the MSA. Located an hour north of Palm Beach, Florida, the assessment area had a population of 151,586, all in Martin County. The MSA 38940 (Port St. Lucie, FL) had 14,008 business establishments according to 2018 D&B information. Key demographics are listed in the chart below:

Assessment Area Demographics – MSA 38940 (Port St. Lucie-FL)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	14.3
Moderate Income	5	13.9	7.0	17.1
Middle Income	12	33.3	36.2	17.5
Upper Income	17	47.2	56.8	51.1
Unknown	2	5.6	0.0	0.0
Total	**36**	**100.0**	**100.0**	**100.0**

M&T did not have any branch locations but maintained a deposit taking ATM in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 38940 (PORT ST. LUCIE, FL)

The overall lending test rating for the State of Florida is Low Satisfactory. M&T's lending test performance in this assessment area was consistent with this performance. During the evaluation period, M&T had very limited lending activity in this assessment area. Overall, HMDA and small business volume was insufficient to analyze. Community development lending performance was adequate. M&T made one community development loan for $1.4 million, which targeted revitalization and stabilization in the assessment area during the evaluation period. Investment

test performance was below the Low Satisfactory rating in the state, as the bank made 19 grants totaling $49,200 over the evaluation period but had no current or prior period investments. Service test performance was below the Low Satisfactory rating for the State of Florida as the bank did not have a branch in the MSA and did not have any community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 38940 (Port St Lucie, FL)	Consistent	Below	Below

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 42640 (SEBASTIAN-VERO BEACH, FL)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 42640 (SEBASTIAN-VERO BEACH, FL)

A limited evaluation of M&T's performance in MSA 42640 (Sebastian-Vero Beach, FL) was conducted. M&T's assessment area consisted of the entirety of Indian River County, which comprises the entire MSA. Located in central Florida along the Atlantic Ocean, the assessment area has a population of 142,866, all in Indian River County. The MSA 42640 (Sebastian-Vero Beach, FL) had 12,002 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 42680 (Sebastian-Vero Beach, Fl)				
Income Category	***Tract Distribution***		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	1	3.2	1.4	20.6
Moderate Income	5	16.1	13.4	18.6
Middle Income	15	48.4	54,1	18.6
Upper Income	8	25.8	31.1	42.2
Unknown	2	6.5	0.0	0.0
Total	**31**	**100.0**	**100.0**	**100.0**

M&T did not have any branch locations but maintained a deposit taking ATM in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 42640 (SEBASTIAN-VERO BEACH, FL)

The overall lending test rating for the State of Florida is Low Satisfactory. M&T's lending test performance in the assessment area was below this performance. During the evaluation period, M&T had very limited lending activity in this assessment area and HMDA and small business volume were insufficient to analyze. M&T did not make any community development loans that benefited the assessment area. Investment test performance was below the Low Satisfactory

performance in the state as M&T made a total of 18 grants totaling $102,500 over the evaluation period, and no current or prior period investments. Service test performance was below the Low Satisfactory rating for the State of Florida, as the bank did not have a branch in the MSA and did not provide any community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 42680 (Sebastian-Vero Beach, FL)	Below	Below	Below

STATE OF MARYLAND

CRA RATING FOR MARYLAND[9]: OUTSTANDING

The Lending test is rated: High Satisfactory

The Investment test is rated: Outstanding

The Service test is rated: Outstanding

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected excellent penetration throughout the bank's assessment areas.
- The distribution of borrowers reflected, given the product lines offered, good penetration of loans among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- An excellent level of qualified community development investments and grants, particularly those not routinely provided by investors, often in a leadership position.
- Made significant use of innovative and/or complex investments to support community development initiatives.

[9] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

- Exhibited excellent responsiveness to credit and community development needs.

Service Test:

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services were tailored to the convenience and needs of its assessment areas, particularly in LMI geographies and/or LMI individuals.
- A leader in providing community development services.

SCOPE OF EXAMINATION

Examiners conducted a full-scope review of MSA 12580 (Baltimore-Columbia-Towson, MD). Activity within the State of Maryland was heavily concentrated in MSA 12580 (Baltimore-Columbia-Towson, MD). MSA 12580 (Baltimore-Columbia-Towson, MD) had 97.6% of total deposits held in the State of Maryland assessment areas and 88.5% of the HMDA and small business loans originated in the State of Maryland assessment areas during the review period. Since MSA 12580 (Baltimore-Columbia-Towson, MD) is the only full scope assessment area for the State of Maryland, ratings are based solely on performance within that MSA. Limited scope reviews were conducted of the remaining Maryland assessment areas:

- MSA 25180 (Hagerstown-Martinsburg, MD-WV)
- MSA 15680 (California-Lexington Park, MD)
- MD Nonmetropolitan Area Group A (Caroline, Dorchester, and Talbot Counties)
- MD Nonmetropolitan Area Group B (Garrett County)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MARYLAND

The bank's activities in the State of Maryland made up a relatively significant proportion of M&T's operations and were weighted accordingly when deriving overall ratings. The bank had 106 branches in the Maryland assessment areas, representing 14.1% of all M&T branches. Maryland branches also generated 16.4% of the institution's total deposits across all assessment areas as of June 30, 2018, and 13.6% of total HMDA and small business loans for the institution. See Summary of Key Assessment Area Data for Maryland, for additional assessment area data.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

LENDING TEST

M&T's lending test performance was based on performance in MSA 12580 (Baltimore-Columbia-Towson, MD). In MSA 12580 (Baltimore-Columbia-Towson, MD), M&T's lending levels reflected good responsiveness to assessment area credit needs, the geographic distribution of loans reflected excellent penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, good penetration of loans among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

Lending Activity

M&T's lending levels reflected good responsiveness to assessment area credit needs when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in the MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected excellent penetration throughout the State of Maryland. This conclusion was based on excellent performance in MSA 12580 (Baltimore-Columbia-Towson, MD). There were no significant lending gaps in the assessment area. For details, refer to the Geographic Distribution section of each full-scope assessment area.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, good penetration of loans among customers of different income levels and businesses of different sizes in the State of Maryland, based on performance in MSA 12580 (Baltimore-Columbia-Towson, MD).

Community Development Lending

M&T was a leader in making community development loans throughout the State of Maryland. During the evaluation period, M&T originated 76 community development loans totaling $448.1 million.

Community development lending initiatives targeted affordable housing and community service initiatives (46.6% and 27.8% of total statewide initiatives, respectively). The remainder of community development lending targeted revitalization and stabilization and economic development, which represented 22.3% and 3.3% of total activity, respectively.

INVESTMENT TEST

M&T's performance under the investment test is rated Outstanding in the State of Maryland based on performance in its MSA 12580 (Baltimore-Columbia-Towson, MD). In the state, M&T had excellent level of qualified investments and grants particularly those not routinely provided by investors, often in a leadership position, made extensive use of innovative and/or complex investments to support community development initiatives and exhibited excellent responsiveness to credit and community development needs.

M&T made 12 new qualified investments, totaling $105.1 million, in the State of Maryland. In addition, M&T had $26.6 million in prior period investments. Additionally, M&T had $3.3 million in prior period investments that benefited the broader statewide or regional area that included the assessment area.

SERVICE TEST

M&T's performance under the service test in the Maryland assessment areas was rated Outstanding. This conclusion is based primarily on performance in MSA 12580 (Baltimore-Columbia-Towson, MD).

Delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area, the bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals and services were tailored to the convenience and needs of its assessment areas, particularly in LMI geographies and/or LMI individuals. The bank was a leader in providing community development services.

Summary of Key Assessment Area Data: Maryland						
	MSA 12580	MSA 25180	MSA 15680	Non-Metro Group A	Non-Metro Group B	Maryland Totals
Total Population[4]	2,769,818	149,270	109,614	102,994	29,813	3,161,509
Population % of AA population	87.6%	4.7%	3.5%	3.3%	0.9%	100.0%
Families	675,620	37,775	27,741	28,264	8,269	777,669
Families % of AA families	86.9%	4.9%	3.6%	3.6%	1.1%	100.0%
Total Census Tracts[4]	683	32	18	30	7	770
Tracts % AA tracts	88.7%	4.2%	2.3%	3.9%	0.9%	100.0%
LMI tracts	243	10	4	6	1	264
LMI tracts % all AA LMI tracts	92.0%	3.8%	1.5%	2.3%	0.4%	100.0%
Total Owner-Occupied Units[4]	687,555	35,980	27,650	28,231	8,848	788,264
Units % of AA units	87.2%	4.6%	3.5%	3.6%	1.1%	100.0%
Business Establishments[5]	132,553	5,867	3,740	5,325	1,591	149,076
Bus. est. % AA bus. est.	88.9%	3.9%	2.5%	3.6%	1.1%	100.0%
Number of Branches[1]	90	9	1	4	2	106
Branches % all branches	84.9%	8.5%	0.9%	3.8%	1.9%	100.0%
Branches in LMI tracts	22	4	0	3	0	29
LMI branches % AA LMI branches	75.9%	13.8%	0.0%	10.3%	0.0%	100.0%
Branch Deposits ($'000,000s)[2]	13,915	433	43	124	90	14,605
Deposits % AA deposits	95.3%	3.0%	0.3%	0.8%	0.6%	100.0%
Deposit Market Share (%)/ Rank in Mkt.	19.3% 2/51	19.4% 3/11	3.1% 7/8	5.4% 8/11	16.0% 2/6	18.5% 2/65
Home Purchase Originations[3]	462	35	2	40	4	543
HP originations % AA orig.	85.1%	6.4%	0.4%	7.4%	0.7%	100.0%
Refinance Originations[3]	1,125	102	4	40	15	1,286
Refi orig. % AA orig.	87.5%	7.9%	0.3%	3.1%	1.2%	100.0%
Home Improvement Originations[3]	614	38	6	18	17	693
Home Improvement orig. % AA orig.	88.6%	5.5%	0.9%	2.6%	2.5%	100.0%
Small Business Originations[3]	1,674	119	1	38	27	1,859
SB orig. % AA orig.	90.0%	6.4%	0.1%	2.0%	1.5%	100.0%
Combined Loan Totals	3,875	294	13	136	63	4,381
% of AA Orig.	88.5%	6.7%	0.3%	3.1%	1.4%	100.0%

(1) Branch numbers are as of 12/31/2018. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/2018. (3)Originations are loans reported under HMDA or CRA small business reporting for 2018. (4)Demographic information was obtained from the 2015 ACS.

METROPOLITAN AREA

(FULL REVIEW)

MSA 12580 (BALTIMORE-COLUMBIA-TOWSON, MD)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 12580 (BALTIMORE-COLUMBIA-TOWSON, MD)

As of December 31, 2018, M&T operated 90 branches in the MSA, representing 84.9% of its branches in Maryland. Based on deposits reported to the FDIC as of June 30, 2018, these branches contained approximately $13.9 billion in deposits, or 95.3% of the bank's total branch deposits in Maryland. As of June 30, 2018, M&T ranked 2nd in MSA 12580 (Baltimore-Columbia-Towson, MD) for deposit market share with 19.3% of the retail deposit market. Other top depository institutions include Bank of America, N.A., PNC N.A., Wells Fargo Bank N.A., and Branch Banking and Trust Co.

Community Contacts

A community contact was conducted with a non-profit organization that promoted economic advancement for low- and moderate-income individuals and families in Baltimore, as well as across Maryland. The organization identified several community needs, including improved funding for financial education programs; closing the gap in the digital divide; providing programs for the local economy including improved access to food, utilities, and affordable housing; and funding and resources for small businesses.

A second community contact was conducted with a non-profit organization that helped clients with debt, credit, and housing issues. The contact stated that Baltimore is not a homogeneous market. The contact indicated that there are deep problems in Baltimore, including high levels of poverty, high foreclosure filings, and high property taxes compared to other areas. The contact noted that housing moratoriums are coming to end and there is a need for a pandemic recovery plan to address evictions. In addition, the contact noted a need for improved branch banking in LMI areas, as well as improved access to credit.

A third community contact was conducted with an organization that focused on small business development. The contact stated small businesses in Maryland have been under immense economic pressure because of the quarantine restrictions. The contact stressed the importance of small businesses in the Baltimore City economy and believed a full recovery will take time. Participation in the Paycheck Protection Program (PPP) and providing financial education to small businesses were noted as essential opportunities for participation by local financial institutions in addressing the credit needs of the community. The contact stated local financial institutions have

been engaged in the community but could do more to address financial education for small businesses.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

The MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area included Anne Arundel, Baltimore, Carroll, Harford, Howard and Queen Anne's Counties and the City of Baltimore. The assessment area was comprised of the entire MSA. According to the 2015 American Community Survey, in 2018 MSA 12580's population totaled 2,769,818. The MSA contained 87.6% of the bank's Maryland State combined assessment area population. The assessment area consisted of 683 census tracts, of which 89 or 13.0%, were low-income, 154 or 22.5% were moderate-income, 228 or 33.4% were middle-income, 196 or 28.7% were upper-income and 16 or 2.3% were of unknown income. The LMI geographies were primarily concentrated in the City of Baltimore.

Income Characteristics

In 2018, the MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area had 675,620 families, of which 22.3% were considered low-income (7.6% of which were below the poverty level), 17.0% were moderate-income, 19.8% were middle-income, and 40.8% were upper-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$81,788	$87,788
Anne Arundel County	$97,557	$102,606
Baltimore City	$47,435	$51,032
Baltimore County	$78,385	$82,329
Carroll County	$95,825	$101,208
Harford County	$88,370	$93,217
Howard County	$119.810	$128,504
Queen Anne County	$89,188	$100.577
State of Maryland	$85,098	$90,089

Housing Characteristics

In 2018, MSA 12580 (Baltimore-Columbia-Towson, MD) had 1,145,512 housing units. In low-income census tracts, 47.3% of the housing units were rental units, 25.1% vacant, and 27.6% were owner-occupied. In moderate-income census tracts, 54.8% of the housing units were either rental or vacant, and 45.2% were owner-occupied.

The median age of housing stock in the assessment area was 43 years old, with 23.7% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans. According to the 2015 ACS, the median housing value in the assessment area was $277,463, which is a significant downward change from the 2010 Census, with an affordability ratio of 25.5. The median gross rent in the assessment area was $1,156 per month.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$308,536	21.7	$277,463	25.5	$1,018	$1,156	13.6%
Anne Arundel County	$370,100	22.6	$334,100	26.9	$1,306	$1,497	14.6%
Baltimore City	$160,400	21.6	$152,400	27.7	$857	$851	-0.7%
Baltimore County	$269,900	23.7	$246,600	27.2	$1,033	$1,163	12.6%
Carroll County	$350,800	23.3	$321,300	26.6	$933	$1,079	15.6%
Harford County	$298,800	25.8	$278,500	28.9	$971	$1,152	18.6%
Howard County	$456,200	22.6	$429,100	25.7	$1,346	$1,579	17.3%
Queen Anne's County	$375,700	24.6	$339,100	25.3	$1,056	$1,178	11.6%
State of Maryland	$329,400	21.5	$277,463	26.0	$1,091	$1,151	5.5%

Labor, Employment and Economic Characteristics

The City of Baltimore has experienced a significant population decline since 1950 when it peaked at 950,000. For the past six decades, the city lost population, falling to about 591,000 in 2019. The decades of population loss and disinvestment has taken a significant toll on the city.

However, low unemployment rates signal that Baltimore is still experiencing full or near-full employment, and that potential employers may have difficulty filling vacant positions. Given these sustained low unemployment rates, employers may experience increased pressure to raise wages, to retain as well as attract new talent. According to D&B data, the assessment area had a total of 132,553 businesses in 2018, of which 120,271 (90.7%) were small businesses with GAR of $1 million or less.

U.S. Department of Labor **Annual Unemployment Rates**					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 12580 (Baltimore-Columbia-Towson, MD)	6.0	5.3	4.6	4.3	4.0
Anne Arundel County	5.1	4.4	3.8	3.6	3.3
Baltimore City	8.6	7.5	6.6	6.3	5.7
Baltimore County	6.1	5.3	4.7	4.4	4.1
Carroll County	4.8	4.2	3.7	3.5	3.2
Harford County	5.7	4.9	4.2	4.0	3.6
Howard County	4.8	3.8	3.3	3.2	3.0
Queen Anne's County	5.1	4.5	3.9	3.7	3.4
State of Maryland	5.2	4.4	4.1	4.0	3.6

Additional performance context data for this assessment area is provided in the subsequent MSA 12580 (Baltimore-Towson, MD) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: MSA 12580 (Baltimore-Columbia-Towson), - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	89	13	51,583	7.6	14,975	29	150,619	22.3
Moderate-income	154	22.5	139,009	20.6	16,748	12	115,141	17
Middle-income	228	33.4	244,704	36.2	13,122	5.4	133,931	19.8
Upper-income	196	28.7	239,449	35.4	6,138	2.6	275,929	40.8
Unknown-income	16	2.3	875	0.1	413	47.2	0	0
Total Assessment Area	**683**	**100.0**	**675,620**	**100.0**	**51,396**	**7.6**	**675,620**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	122,695	33,878	4.9	27.6	58,061	47.3	30,756	25.1
Moderate-income	262,370	118,674	17.3	45.2	114,565	43.7	29,131	11.1
Middle-income	406,639	262,778	38.2	64.6	114,662	28.2	29,199	7.2
Upper-income	350,736	271,844	39.5	77.5	59,665	17	19,227	5.5
Unknown-income	3,072	381	0.1	12.4	1,804	58.7	887	28.9
Total Assessment Area	**1,145,512**	**687,555**	**100.0**	**60.0**	**348,757**	**30.4**	**109,200**	**9.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6,408	4.8	5,748	4.8	593	5.4	67	5.1
Moderate-income	20,284	15.3	18,586	15.5	1,530	14	168	12.7
Middle-income	50,410	38	45,402	37.7	4,487	40.9	521	39.4
Upper-income	54,518	41.1	49,754	41.4	4,210	38.4	554	41.9
Unknown-income	933	0.7	781	0.6	140	1.3	12	0.9
Total Assessment Area	**132,553**	**100.0**	**120,271**	**100.0**	**10,960**	**100.0**	**1,322**	**100.0**
	Percentage of Total Businesses:			**90.7**		**8.3**		**1.0**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 12580 (BALTIMORE-COLUMBIA-TOWSON, MD)

LENDING TEST

M&T's performance under the lending test in MSA 12580 (Baltimore-Columbia-Towson, MD) is based on the following summary. M&T's lending levels reflected good responsiveness to assessment area credit needs, the geographic distribution of loans reflected excellent penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, good penetration of loans among customers of different income levels and businesses of different sizes and the bank was a leader in making community development loans.

Greater weight was given to the analysis of small business and refinance lending performance, followed by home purchase and home improvement lending, which was based on loan volumes. Multifamily lending was only considered in the evaluation of community development lending and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

Lending Activity

M&T's lending levels reflected good responsiveness to assessment area credit needs in MSA 12580 (Baltimore-Columbia-Towson, MD). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related and small business lending were considered good. For the five-year evaluation period, lending activity totaled 13,686 loans, consisting of 2,725 home purchase, 2,852 refinance, 1,988 home improvement and 6,121 small business loans. Lending activity on an annualized basis declined somewhat (-2.9%) compared to the prior two-year evaluation period, during which lending activity totaled 5,605 loans consisting of 1,091 home purchase, 2,273 refinance, 600 home improvement, and 1,641 small business loans. This annualized decrease was driven by decreases in home purchase (-1.9%), and refinance (-49.8%) lending. Annualized home improvement (32.5%) and small business lending (49.2%) increased, however. For the evaluation period, there was a decrease in lending volume on an annualized basis for the aggregate overall.

M&T's market share of deposits declined moderately while lending market shares increased overall. In 2018, M&T had a deposit market share of 19.3%, and lending market shares of 0.9% in home purchase, 4.9% in refinance lending, 12.5% in home improvement, and 2.7% in small business lending. In comparison, at the beginning of the review in 2014 M&T had a deposit market share of 22.4% and lending market shares of 1.5% in home purchase, 1.4% in refinance, 6.9% in home improvement, and 2.4% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected excellent penetration throughout the MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area. This conclusion is based on excellent penetration in LMI tracts for home purchase, refinance, and home improvement loans, and good penetration in LMI census tracts for small business loans.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 90.8% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 73.0% of low-income census tracts and 89.6% of moderate-income census tracts. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending was slightly lower as the bank penetrated 84.9% of all census tracts in 2017, 85.8% in 2016, 86.4% in 2015 and 86.7% in 2014.

MSA 12580 (Baltimore-Columbia-Towson, MD)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			

Low	89	24	73.0%
Moderate	154	16	89.6%
Middle	228	7	96.9%
Upper	196	7	96.4%
Unknown	16	9	43.8%
Total Tracts	683	63	90.8%
2017			
Low	89	35	60.7%
Moderate	154	29	81.2%
Middle	228	12	94.7%
Upper	196	18	90.8%
Unknown	16	9	43.8%
Total Tracts	683	103	84.9%
2016			
Low	100	34	66.0%
Moderate	147	23	84.4%
Middle	227	27	88.1%
Upper	197	5	97.5%
Unknown	12	8	33.3%
Total Tracts	683	97	85.8%
2015			
Low	100	35	65.0%
Moderate	147	26	82.3%
Middle	227	14	93.8%
Upper	197	8	95.9%
Unknown	12	10	16.7%
Total Tracts	683	93	86.4%
2014			
Low	100	31	69.0%
Moderate	147	18	87.8%
Middle	227	18	92.1%
Upper	197	13	93.4%
Unknown	12	11	8.3%
Total Tracts	683	91	86.7%

Home Purchase

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 11.3% by number and 6.2% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts exceeded the 4.9% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 3.6% by number and 1.9% by dollar in low-income census tracts. In moderate-income census tracts in 2018, the bank made 22.7% by number and 15.8% by dollar of home purchase loans in moderate-income census tracts, exceeding both the 17.3% of owner-occupied housing units located in moderate-income census tracts and the aggregate, which made 16.2% by number and 10.9% by dollar in moderate-income census tracts.

In 2014-2017, the bank's home purchase lending in both low- and moderate-income census tracts was consistent with its excellent performance in 2018, with the bank's performance exceeding both demographic and aggregate figures in each year.

Refinance

The geographic distribution of refinance loans reflected excellent penetration throughout the assessment area, which was driven by 2014-2017 performance. In 2018, M&T made 2.0% by number and 0.9% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was below the 4.9% of owner-occupied housing units located in low-income census tracts and was below the aggregate, which made 2.8% by number and 1.7% by dollar in low-income census tracts. In 2018, the bank made 14.2% by number and 10.5% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number was below the 17.3% of owner-occupied housing units located in moderate-income census tracts and was comparable to the aggregate, which made 14.4% by number and 9.8% by dollar volume in moderate-income census tracts.

M&T's refinance performance in 2014-2017 exceeded 2018's performance. In 2014 and 2015, the bank's refinance lending in low-income census tracts exceeded the demographic and the aggregate. In 2016 and 2017, the bank's refinance lending in low-income census tracts was below the demographic but exceeded the aggregate. In moderate-income census tracts the bank's refinance lending in moderate-income census tracts in 2014-2017 exceeded the demographic and the aggregate.

Home Improvement

The overall geographic distribution of home improvement loans reflected excellent penetration throughout the assessment area driven by 2014-2017 performance. In 2018, the bank made 2.8% by number and 1.4% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending in low-income census tracts, by number, was below the 4.9% of owner-occupied housing units located in low-income census tracts but exceeded the aggregate,

which made 1.8% by number and 1.3% by dollar in low-income census tracts. In 2018, the bank made 12.7% by number and 9.0% by dollar of its home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts, by number, was below the 17.3% of owner-occupied housing units located in moderate-income census tracts, but performance exceeded the aggregate, which made 9.1% by number and 7.1% by dollar in moderate-income census tracts.

In 2014-2017, M&T's home improvement lending performance was excellent, exceeding 2018's performance. In 2014-2017, the bank's home improvement lending in both low- and moderate-income census tracts exceeded the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018, the bank's small business lending in low-income census tracts performance of 4.1% was below 4.8% of businesses located in low-income census tracts. By dollar amount, the bank's small business lending in low-income census tracts exceeded the demographic, as the bank made 7.1% in low income tracts. Performance was comparable to the aggregate, which made both 4.1% in number and dollar in low-income census tracts. In 2018, the bank made 13.5% by number and 13.9% by dollar of small business loans in moderate-income census tracts which was slightly below the demographic of the assessment area where 15.3% of small businesses were located. M&T's small business lending in moderate-income census tracts was comparable to the aggregate, which made 13.8% by number and 13.1% by dollar volume in moderate-income census tracts.

In 2014-2017, M&T's small business lending was below 2018's performance. In low-income census tracts in 2014 and 2016 small business lending was below the demographic but comparable to the aggregate. In 2015 and 2017, small business lending was below the demographic and the aggregate. In moderate-income tracts the bank's small business lending in 2014 exceeded the demographic and the aggregate, while in 2015 and 2017 was below the aggregate but comparable to the demographic. The bank's small business lending in moderate-income census tracts in 2016 was below the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, good penetration of loans among customers of different income levels and businesses of different sizes in MSA 12580 (Baltimore-Columbia-Towson, MD).

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration of loans among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers was 17.3% by number and 7.8% by dollar. Performance exceeded the aggregate lending data, at 8.3% by number and 4.3% by dollar, while it was slightly below the demographic figure, at 22.3%. The bank's lending to moderate-income borrowers, at 25.3% by number and 17.5% by dollar, slightly exceeded the aggregate lending data, at 21.0 % by number and 15.6% by dollar, and exceeded the demographic figure, at 17.0%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending. In 2014 and 2017, performance was below the demographic figure and, in 2015 and 2016, performance was consistent with the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the bank's 2018 performance. The bank's lending exceeded the aggregate lending data and exceeded the demographic figure, with the exception of 2014 when it exceeded the demographic figure and was comparable to aggregate.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration of loans among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers was 16.6% by number and 9.4% by dollar and exceeded aggregate lending data, at 10.3% by number and 5.9% by dollar. Performance fell below the demographic figure, at 22.3%. The bank's lending to moderate-income borrowers, at 21.4% by number and 15.7% by dollar, was slightly above both the aggregate lending data, at 18.2% by number and 13.5% by dollar, as well as the demographic figure at 17.0%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers exceeded aggregate lending data in 2015-2017 and was comparable to the aggregate lending data in 2014, while falling below the demographic figure in each year. The bank's lending to moderate-income borrowers in 2014-2017 was also consistent with the 2018 performance. The bank's lending was above the aggregate lending data and comparable to the demographic figure in 2015-2017, while in 2014, performance was below the demographic figure and comparable to the aggregate lending.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration of loans among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers was 16.1% by number and 11.7% by dollar, which significantly exceeded the aggregate lending data, at 8.0% by number and 5.4% by dollar. However, performance was below the demographic figure, at 22.3%. The bank's lending to moderate-

income borrowers, at 22.0% by number and 15.9% by dollar, exceeded both the aggregate lending data, at 15.9% and 12.1% by dollar, and the demographic figure, at 17.0%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance, as lending to low-income borrowers significantly exceeded the aggregate data lending and the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending was above both the aggregate lending data, and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration of loans among businesses of different sizes. In 2018, the bank originated 59.6% of loans by number and 25.4% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data of 45.4% by number but was below aggregate lending data of 30.3% by dollar. However, performance was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 90.7%. While the bank's loan volume was significantly below the demographic figure, the bank originated 70.7% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was below 2018 lending. The bank's lending to small businesses was more comparable or slightly below aggregate lending, while significantly below the demographic figure.

Community Development Lending

M&T was a leader in making community development loans in MSA 12580 (Baltimore-Towson, MD), with 67 loans, totaling $381.8 million, or 85.2% of the bank's Maryland community development lending. By dollar volume of community development loans, M&T had the second highest annualized community development loans of peer institutions. However, due to the bank's significant deposit market share in the assessment area, M&T ranked 5th out of five similarly-situated banks when comparing annualized community development loans to deposits within the MSA 12580 (Baltimore-Columbia-Towson, MD) assessment area. Each of the similarly-situated institutions in the comparison were leaders in the assessment area in community development lending.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	25	181,679
Community Services	25	103,206
Economic Development	10	14,722
Revitalize and Stabilize	7	82,145
Total	**67**	**$381,752**

Performance within the MSA was directed at affordable housing and community service initiatives representing, by dollar amount, 47.6% and 27.0%, respectively, of all community development activity.

Examples of community development initiatives included:

- Five loans totaling $107.5 million to a non-profit that works in partnership with developers and corporate investors to invest and manage equity and debt investments for affordable housing and community revitalization efforts. Three of the loans were new lending initiatives and two loans were renewals of a $25.0 million revolving credit agreement.
- A $28.4 million commercial mortgage for the purchase and rehabilitation of 301 affordable housing units in a moderate-income tract.
- A $57.8 million construction to permanent loan for the construction of a distribution center. This loan helps to promote economic development by creating job opportunities for low- and moderate-income individuals from the surrounding communities.
- Two loans totaling $31.3 million to a non-profit skilled nursing facility providing healthcare services to individuals who receive or are eligible to receive Medicaid.

INVESTMENT TEST

M&T's performance in MSA 12580 (Baltimore-Columbia-Towson, MD) is based on the following summary. The bank made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, and often in a leadership position, made significant use of innovative or complex investments to support community development initiatives and exhibited excellent responsiveness to credit and community development needs of the assessment area.

Investments in MSA 12580 (Baltimore-Columbia-Towson, MD) consisted of $102.7 million during the current period and $23.3 million outstanding from the prior period. When compared to five similarly-situated institutions in the assessment area, of which a majority were rated Outstanding, M&T ranked fifth. In addition, the bank had 15 community development prior period investments that benefited the broader statewide and regional area including the assessment area, all of which were mortgage backed securities that benefited the assessment area in response to the need for affordable housing.

Qualified Community Development Investments by Purpose October 1, 2014 –December 31, 2019					
Area	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total

	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 12580 (Baltimore-Columbia-Towson, MD) - New	7	90,189	1	12,500	0	0	0	0	8	102,689
MSA 12580 (Baltimore-Columbia-Towson, MD) - New – Prior Period	43	9,548	1	11,901	0	0	4	1,869	48	23,318
Broader Statewide or Regional Area	15	3,326	0	0	0	0	0	0	15	3,326
Total	65	103,063	2	24,401	0	0	4	1,869	71	129,333

The following are examples of qualified investments that met critical needs in the assessment area:

- A $12.5 million investment in New Market Tax Credits (NMTC) for a non-profit organization that provides transitional housing, counseling, and other assistance to LMI individuals suffering from homelessness and addiction in Baltimore.
- A $16.1 million investment in LIHTC for construction and acquisition of 87 housing units of which 78 units are funded from the LIHTCs. The project received a 20-year project-based Section 8 Housing Assistance Payments Contract from HUD.
- A $16.6 million investment in LIHTC for the acquisition and rehabilitation of 203-units of affordable housing with all units reserved for seniors with incomes under 60% of AMI.
- A $7.1 million investment in LIHTC for construction of 100 units of affordable housing for tenants with incomes under 60% of AMI.

In addition to the qualified investments, the bank made 216 grants or donations totaling $2.6 million during the evaluation period, as illustrated in the table below. The grants and donations were primarily comprised of funds for community service activities.

Qualified Community Development Donations by Purpose **October 1, 2014 – December 31, 2019**										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 12580 (Baltimore-Columbia-Towson, MD)	18	200,700	196	2,459,960	2	10	0	0	216	2,660,670

SERVICE TEST

M&T's performance under the service test in MSA 12580 (Baltimore-Columbia-Towson, MD) was based on delivery systems that were accessible to the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations that did not adversely affect accessibility of its delivery systems particularly to LMI geographies and/or individuals, and services were tailored to the convenience and needs of the assessment area particularly in LMI geographies and/or LMI individuals. M&T was also a leader in providing community development services.

Retail Services

M&T's delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area. M&T operated 90 branches in the assessment area. Of the total branches, five (5.6%) were in low-income areas and 17 (18.9%) were in moderate-income areas, compared to 9.0% and 22.0% of the MSA's population that resided in low- and moderate-income areas, respectively.

Alternative delivery systems enhanced the bank's performance in the assessment area. M&T had 118 off-site ATM locations in the MSA; six (5.1%) of which were in low-income tracts and 27 (22.9%) were in moderate-income tracts.

The bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. During the evaluation period, M&T opened one branch in the assessment area, located in a middle-income tract. The bank closed four branches, of which three were in middle-income tracts and one was in an upper-income tract.

The bank's hours and services were tailored to the needs and convenience of its assessment area, particularly LMI geographies and/or LMI individuals. Of the bank's 90 branches in the MSA, 81, or 90%, had extended hours and 78 branches or 87% had Saturday hours. Of the 22 branches in LMI census tracts, all 22 (100%) branches had extended and Saturday hours.

Community Development Services

M&T was a leader in providing community development services in this MSA. The table shows the number and type of services the bank provided during the evaluation period. The bank's management and staff served on the board of directors for 307 nonprofit and community-based organizations throughout this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	1,127
Technical Assistance	7
Small Business Seminars	0
Board Participation	307
Total	**1,441**

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 25180 (HAGERSTOWN-MARTINSBURG, MD-WV)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 25180 (HAGERSTOWN-MARTINSBURG, MD-WV)

A limited evaluation of M&T's performance in MSA 25180 (Hagerstown-Martinsburg, MD-WV) was conducted. M&T's assessment area consisted of all of Washington County, MD, which is the entire MSA. Located in western Maryland, Hagerstown is the central commercial and industrial hub for a tri-state area consisting of western Maryland, south central Pennsylvania, and the eastern panhandle of West Virginia. The assessment area had a population of 149,270, all in Washington County. The MSA 25180 (Hagerstown-Martinsburg, MD-WV) assessment area had 5,867 business establishments according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 25180 (Hagerstown-Martinsburg, MD-WV)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	2	6.3	1.6	20.8
Moderate Income	8	25.0	15.6	16.4
Middle Income	14	43.8	48.0	22.1
Upper Income	7	21.9	34.8	40.8
Unknown	1	3.1	0.0	0.0
Total	**32**	**100.0**	**100.0**	**100.0**

M&T maintained nine branches in the assessment area, of which one was in a low-income and three were in moderate-income census tracts. M&T ranked 3rd in the MSA out of 11 banks with 19.4% of all deposits in the MSA. M&T's deposits in this MSA were 3.0% of M&T's deposits in the State of Maryland.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 25180 (HAGERSTOWN-MARTINSBURG, MD-WV)

The overall lending test rating for the State of Maryland is High Satisfactory. M&T's lending test performance in the assessment area was below this performance, as lending activity was good while borrower and geographic distribution were adequate. M&T made three community development loans for $21.4 million, which targeted community services. Investment test performance was below the Outstanding performance in the state, as the bank made two mortgage backed security investments totaling $645,408 and 17 grants totaling $71,000 over the evaluation period. Service test performance was consistent with the Outstanding rating for the State of Maryland, as the bank's delivery systems were accessible to all parts of the assessment area and the bank was a leader in providing community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 25180 (Hagerstown, MD-WV)	Below	Below	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 15680 (CALIFORNIA-LEXINGTON PARK, MD)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 15680 (CALIFORNIA-LEXINGTON PARK, MD)

A limited evaluation of M&T's performance in MSA 15680 (California-Lexington Park, MD) was conducted. M&T's assessment area consisted of all of St. Mary's County, which is the entire MSA. Located in southern Maryland, St Mary's County is part of the Chesapeake Bay tidewater region known for farming, fishing, and crabbing. It is also home to Patuxent River Naval Air Station and related defense contracting industries. The assessment area had a population of 109,614, all in St. Mary's County. The MSA 15680 (California-Lexington Park, MD) had 3,740 business establishments according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 15680 (California-Lexington Park, MD)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	1	5.6	2.7	20.1
Moderate Income	3	16.7	8.6	16.9
Middle Income	10	55.6	67.7	24.6
Upper Income	3	16.7	21.0	38.3
Unknown	1	5.6	0.0	0.0
Total	**18**	**100.0**	**100.0**	**100.0**

M&T maintained one branch in the MSA located in a middle-income census tract. M&T ranked 7th in the MSA out of eight banks with 3.1% of all deposits in the MSA. Less than 1.0% of all M&T's deposits in the State of Maryland were in this MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 15680 (CALIFORNIA-LEXINGTON PARK, MD)

The overall lending test rating for the State of Maryland is High Satisfactory. M&T's lending test performance in the assessment area was below this performance as lending volumes were insufficient to obtain meaningful conclusions and no community development loans were made in this assessment area. Investment test performance was below the Outstanding performance in the state as the bank had an outstanding balance of $1.2 million on a prior period investment to develop

housing and no new investments or grants. Service test performance was below the Outstanding rating for the State of Maryland for both retail and community development services as the bank had only one branch, which was located in a middle-income tract and the bank only provided an adequate level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 15680 (California-Lexington Park, MD)	Below	Below	Below

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN GROUP A (CAROLINE, DORCHESTER, AND TALBOT COUNTIES, MD)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN GROUP A (CAROLINE, DORCHESTER, AND TALBOT COUNTIES, MD)

A limited evaluation of M&T's performance in the Non-Metropolitan Group A (Caroline, Dorchester, and Talbot Counties, MD) was conducted. M&T's assessment area consisted of the three counties. The assessment area had a population of 102,994 with 32,661 residing in Caroline County, 32,534 residing in Dorchester County, and 37,799 residing in Talbot County. There were 5,325 business establishments in the assessment area according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Group A, MD)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	1	3.3	1.6	21.7
Moderate Income	5	16.7	13.9	16.0
Middle Income	17	56.7	65.9	21.3
Upper Income	5	16.7	18.7	41.0
Unknown	2	6.7	0.0	0.0
Total	**30**	**100.0**	**100.0**	**100.0**

M&T maintained four branches in the three counties. Three of the four branches were in moderate-income census tracts. M&T ranked eighth in Non-Metropolitan Group A out of 11 banks with 5.4% of all deposits. Less than 1.0% of all M&T's deposits in the State of Maryland were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN GROUP A (CAROLINE, DORCHESTER, and TALBOT COUNTIES, MD)

The overall lending test rating for the State of Maryland is High Satisfactory. M&T's lending test performance in the assessment area was below with this performance as lending activity, geographic and borrower distribution performance was adequate. M&T made one community development loan for $6.2 million in Talbot County, which targeted affordable housing.

Investment test performance was below the Outstanding performance in the state. The bank made one LIHTC investment for $1.6 million for 71 units of affordable housing in Talbot County and had a LIHTC investment with an outstanding balance of $1.4 million from a prior period investment in Dorchester County. In addition, a total of $59,000 in grants and donations were made to various organizations that primarily supported community service activity. Service test performance was consistent with the Outstanding rating for the State of Maryland based on delivery systems that were readily accessible to all portions of the assessment area and good community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan Group Maryland A	Below	Below	Consistent

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN GROUP B (GARETT COUNTY, MD)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN GROUP B (GARETT COUNTY, MD)

A limited evaluation of M&T's performance in the Non-Metropolitan Group B (Garrett County, MD) was conducted. M&T's assessment area consisted of the entire county. The assessment area had a population of 29,813, all in Garrett County and had 1,591 business establishments according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Group B, MD)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	21.5
Moderate Income	1	14.3	12.1	24.0
Middle Income	6	85.7	87.9	20.3
Upper Income	0	0.0	0.0	34.2
Unknown	0	0.0	0.0	0.0
Total	**7**	**100.0**	**100.0**	**100.0**

M&T maintained two branches in the county. Both the branches were in middle-income census tracts. M&T ranked second in Non-Metropolitan Group B out of six banks with 16.0% of all deposits. Less than 1.0% of all M&T's deposits in the State of Maryland were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN GROUP B (GARETT COUNTY, MD)

The overall lending test rating for the State of Maryland is High Satisfactory. M&T's lending test performance in the assessment area was below this performance as lending activity, geographic distribution, and borrower distribution performance was adequate. M&T did not make any community development loans in this assessment area. Investment test performance was below the Outstanding performance in the state as the bank had a current book value of $101,387 outstanding for a prior period investment. No qualified grants or donations were made in the assessment area. Performance under the service test was below the Outstanding rating for the State of Maryland as both retail and community development services were adequate.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan Maryland Group B	Below	Below	Below

STATE OF MASSACHUSETTS

CRA RATING FOR MASSACHUSETTS: SATISFACTORY

The Lending test is rated: Low Satisfactory

The Investment test is rated: Low Satisfactory

The Service test is rated: Needs to Improve

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout the bank's assessment areas.
- The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and very small businesses.
- A leader in making community development loans.
- Made limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- An adequate level of qualified community development investments and grants, particularly those not routinely provided by investors, rarely in a leadership position.
- Made rare use of innovative and/or complex investments to support community development initiatives.
- Exhibited adequate responsiveness to credit and community development needs.

Service Test:

- Delivery systems were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services varied in a way that inconvenienced its assessment area particularly LMI geographies and/or LMI individuals.
- Provided few if any community development services.

SCOPE OF EXAMINATION

The evaluation of M&T's activities in the State of Massachusetts consisted of a full-scope review of MD 14454 (Boston, MA). Activities within the State of Massachusetts were made entirely within MD 14454 (Boston, MA). Performance ratings for the State of Massachusetts were based solely on the evaluation conducted of the MD 14454 (Boston, MA) assessment area, as it was the only assessment area within the State of Massachusetts. As shown in Exhibit I, this assessment area has a very small proportion of M&T's loans and no deposits, representing less than 1.0% of the bank's branches and loans.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MASSACHUSETTS

As of December 31, 2018, M&T's operations in the State of Massachusetts were based entirely in MD 14454 (Boston, MA). Massachusetts has one of the lowest branch presences and deposit bases and the branches generally support commercial banking operations. As detailed in Exhibit I, as of June 30, 2018, lending in the state generated less than 1.0% of M&T's combined HMDA-related and small business loans during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

Conclusions regarding M&T's performance in Massachusetts with respect to the lending, investment, and service tests were based solely on performance in the MD 14454 (Boston, MA) assessment area. M&T's performance with respect to lending, investment, and service tests are generally below the overall conclusions for the bank. Performance under the lending and investment tests are rated Low Satisfactory and the service test is rated Needs To Improve. Conclusions for the State of Massachusetts had little impact on the overall conclusions for the bank. Specific comments regarding the lending, investment and service tests are discussed below.

METROPOLITAN AREA

(Full Review)

MD 14454 (BOSTON, MA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD 14454 BOSTON, MA)

The MD 14454 (Boston, MA) assessment area is in east Massachusetts and consisted of Norfolk and Suffolk Counties, which represented a portion of the MD. Norfolk County included 28 eastern Massachusetts communities, mostly located to the south and west of the City of Boston. Suffolk County had four cities; Chelsea, Revere, Winthrop, and Boston, which was the county seat. The MD was a competitive marketplace where large super-regional banks compete with community banks, savings and loan associations, and non-financial institutions. As of December 31, 2018, M&T operated two branches, no deposits, that primarily support commercial banking operations in MD 14454 (Boston, MA).

Community Contacts

As part of the CRA evaluation process, two community contacts were conducted. The first contact primarily serves Asian LMI communities by building affordable homes and providing community services. To date, the non-profit organization has built and preserved over 400 units within Boston's Chinatown and the City of Quincy. The contact highlighted that Boston's Chinatown is comprised of approximately 50% Asians, who are primarily LMI; however, the contact noted that there has been a decline in LMI population in the neighborhood as residents have been priced out due to luxury development complexes. The contact described the Asian LMI population as facing barriers to upward mobility and economic stability due to low education attainment levels and limited English language skills proficiency. The contact emphasized that there were housing inventory issues in the community, identifying affordable housing as the foremost critical need of the community.

A second contact was conducted with an organization with a mission to help people have a safe and affordable place to live by developing and managing affordable housing, educating, and assisting homeowners and homebuyers, and helping homeowners repair and maintain their homes. The contact indicated that affordable housing and stable neighborhoods help individuals and families realize their full dignity and potential. Overall, the contact noted banks in the community are meeting the community needs. The contact stated that they always welcome more participation from banks with financial coaching seminars and classes including assistance with financial incentives to get people to come to the classes. The performance by the local financial institutions is very strong. They are all active in the community and offer a good variety of first-time homebuyer loan products.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MD 14454 (Boston, MA) consisted of Norfolk County and Suffolk County and excludes Plymouth County. The MD 14454 assessment area's population totaled 1,446,640. The MD contained 100.0% of the bank's State of Massachusetts assessment area population.

Of the 334 census tracts in the assessment area, 48 or 14.4%, were low-income, 76 or 22.8% were moderate-income, 94 or 28.1% were middle-income, 103 or 30.8% were upper-income and 13 or 3.9% were of unknown income.

Income Characteristics

In 2018, the MD 14454 (Boston, MA) assessment area had 317,929 families, of which 25.8% (9.8% of which were below the poverty level) were considered low-income, 15.4% were moderate-income, 17.6% middle-income, and 41.2% upper-income. The FFIEC median family incomes for the counties comprising the MD as of the 2010 Census and 2015 ACS are as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$81,125	$88,515
Norfolk County	$101,870	$112,605
Suffolk County	$58,127	$62,050
MD 14454 (Boston, MA)	$83,664	$90,699
State of Massachusetts	$81,165	$87,085

Housing Characteristics

MD 14454 (Boston, MA) had 593,783 housing units, of which 47.9% were owner-occupied and 45.8% were rental units. Of the available owner-occupied units, 20.7% were in LMI areas. In low-income census tracts, 75.2% of the housing units were rental units, 8.0% vacant, and 16.8% were owner-occupied. In moderate-income census tracts, 66.3% of the housing units were either rental or vacant, and 33.7% were owner-occupied.

The median age of housing stock in the assessment area was 61 years old, with 47.3% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated there may be a higher demand for home improvement loans.

The median housing value in the assessment area was $390,945, with an affordability ratio of 17.7. The median gross rent in the assessment area was $1,309 per month. Within the assessment area, 48.6% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$397,812	16.0	$390,945	17.7	$1,189	$1,309	10.1%
Norfolk County	$408,100	19.9	$399,500	22.1	$1,205	$1,332	10.5%
Suffolk County	$384,500	13.2	$377,100	14.6	$1,181	$1,298	9.9%
State of Massachusetts	$352,300	18.3	$333,100	20.6	$1,006	$1,102	9.5%

Labor, Employment and Economic Characteristics

Education and health services was the largest employment sector in the MD with roughly 541,400 employees, while the professional and business services was the second largest employment sector with approximately 451,300 employees. Trade, transportation, and utilities, and local government were also major employment sectors in MD 14454 (Boston, MA). According to D&B data, the assessment area had a total of 78,603 businesses in 2018, of which 69,644 (88.6%) were small businesses with GAR of $1 million or less.

The assessment area was near full employment for the majority of the review period with unemployment rates under 4.0%. This indicated that the assessment area may have above average economic conditions that provided opportunities for lending.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MD 14454 (Boston-Cambridge-Newton, MA)	4.9	4.1	3.3	3.2	2.9
Norfolk County	5.0	4.2	3.4	3.4	3.0
Suffolk County	5.3	4.4	3.6	3.4	3.0
State of Massachusetts	5.8	4.8	3.9	3.7	3.4

Additional performance context data for this assessment area is provided in the MD 14454 (Boston, MA) Assessment Area Demographics table on the following page.

Assessment Area Demographics

Assessment Area: MD 14454 (Boston-Quincy, MA) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	48	14.4	33,893	10.7	10,390	30.7	82,124	25.8
Moderate-income	76	22.8	70,377	22.1	11,062	15.7	48,974	15.4
Middle-income	94	28.1	96,925	30.5	6,101	6.3	55,870	17.6
Upper-income	103	30.8	115,691	36.4	3,582	3.1	130,961	41.2
Unknown-income	13	3.9	1,043	0.3	163	15.6	0	0
Total Assessment Area	**334**	**100.0**	**317,929**	**100.0**	**31,298**	**9.8**	**317,929**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	63,728	10,719	3.8	16.8	47,898	75.2	5,111	8
Moderate-income	142,479	47,989	16.9	33.7	84,285	59.2	10,205	7.2
Middle-income	182,348	98,423	34.6	54	73,991	40.6	9,934	5.4
Upper-income	201,165	125,946	44.3	62.6	63,325	31.5	11,894	5.9
Unknown-income	4,063	1,086	0.4	26.7	2,555	62.9	422	10.4
Total Assessment Area	**593,783**	**284,163**	**100.0**	**47.9**	**272,054**	**45.8**	**37,566**	**6.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	5,389	6.9	4,825	6.9	524	6.4	40	5.5
Moderate-income	11,977	15.2	11,039	15.9	856	10.4	82	11.2
Middle-income	19,777	25.2	17,781	25.5	1,867	22.7	129	17.6
Upper-income	40,662	51.7	35,332	50.7	4,857	59	473	64.6
Unknown-income	798	1	667	1	123	1.5	8	1.1
Total Assessment Area	**78,603**	**100.0**	**69,644**	**100.0**	**8,227**	**100.0**	**732**	**100.0**
	Percentage of Total Businesses:			**88.6**		**10.5**		**0.9**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 14454 (BOSTON, MA)

LENDING TEST

M&T's performance in MSA 14454 (Boston, MA) is based on the following summary. The bank's lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected adequate penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes, and M&T was a leader in making community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MD 14454 (Boston, MA). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered adequate, while small business lending was good. For the five-year evaluation period, lending activity totaled 388 loans consisting of 102 home purchase, 58 refinance, 6 home improvement and 222 small business loans. Lending activity declined on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 248 loans consisting of 79 home purchase, 123 refinance, 3 home improvement, and 43 small business loans. HMDA and small business volume for the evaluation period decreased (-37.4%) overall on an annualized basis compared to the previous evaluation period. Comparisons to the aggregate for the evaluation period indicated a decrease in lending volume for the aggregate overall on an annualized basis. The bank had no market share for deposits throughout the review period.

Geographic Distribution

M&T's geographic distribution of HMDA-related and small business loans reflected adequate penetration in the MD 14454 (Boston, MA) assessment area. The bank's HMDA performance was based on the bank's home purchase and refinance lending because the bank's home improvement lending volume in 2014-2018 was insufficient to analyze. Lending penetration in LMI tracts for home purchase and refinance loans was good, while small business penetration in LMI census tracts was poor. Greater weight was given to the analysis of small business lending based on the overall loan volumes in the assessment area; however, the bank's presence in the assessment area, with only two branches, is very limited.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 9.6% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 2.1% of low-income census tracts and 10.5% of moderate-income census tracts. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending was comparable as the bank penetrated 10.5% of all census tracts in 2017, 11.7% in 2016, 14.7% in 2015 and 16.5% in 2014. The bank's low levels of census tract penetration were in part due to its very limited presence in the assessment area.

MD 14454 (Boston, MA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	48	47	2.1%
Moderate	76	68	10.5%
Middle	94	83	11.7%

Upper	103	91	11.7%
Unknown	13	13	0.0%
Total Tracts	334	302	9.6%
2017			
Low	48	46	4.2%
Moderate	76	70	7.9%
Middle	94	79	16.0%
Upper	103	91	11.7%
Unknown	13	13	0.0%
Total Tracts	334	299	10.5%
2016			
Low	55	53	3.6%
Moderate	64	56	12.5%
Middle	101	85	15.8%
Upper	102	89	12.7%
Unknown	12	12	0.0%
Total Tracts	334	295	11.7%
2015			
Low	55	51	7.3%
Moderate	64	51	20.3%
Middle	101	87	13.9%
Upper	102	84	17.6%
Unknown	12	12	0.0%
Total Tracts	334	285	14.7%
2014			
Low	55	51	7.3%
Moderate	64	52	18.8%
Middle	101	80	20.8%
Upper	102	84	17.6%
Unknown	12	12	0.0%
Total Tracts	334	279	16.5%

Home Purchase

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area. M&T's home purchase lending in low-income tracts was good in 2018 and good

in 2014-2017. M&T's home purchase lending in moderate-income tracts was excellent in 2018 and 2014-2017.

In 2018, the bank made 6.3% by number and 1.2% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts exceeded the 3.8% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 4.9% by number in low-income census tracts. M&T's home purchase lending in low-income census tracts by dollar was below the aggregate, which made 4.7% by dollar in low-income census tracts. In moderate-income census tracts M&T made 31.3% by number and 8.4% by dollar of home purchase loans in moderate-income census tracts and exceeded the 16.9% of owner-occupied housing units located in moderate-income census tracts. M&T's home purchase lending in moderate-income census tracts by number also exceeded the aggregate, which made 19.7% by number in moderate-income census tracts. M&T's home purchase lending in moderate-income census tracts by dollar was below the aggregate, which made 17.0% by dollar in moderate-income census tracts.

Home purchase lending in 2014-2017 was below 2018's performance. In 2014, the bank's home purchase lending in low-income census tracts exceeded the demographic and was comparable to the aggregate, while in 2015 and 2017, the bank's home purchase lending in low-income census tracts exceeded the demographic and the aggregate. In 2016, the bank's home purchase lending in low-income census tracts was below the demographic and the aggregate as the bank did not make a home purchase loan in a low-income tract. In 2014, 2015 and 2017, the bank's home purchase lending in moderate-income census tracts exceeded the demographic and the aggregate. In 2016, the bank's home purchase lending in moderate-income census tracts exceeded the demographic and was comparable to aggregate.

Refinance

The geographic distribution of refinance loans reflected good penetration throughout the assessment area. In 2018, the bank did not make any refinance loans in low-income census tracts. In comparison, the aggregate made 5.2% by number and 5.4% by dollar in low-income census tracts while 3.8% of owner-occupied housing units were in low-income census tracts. In 2018, the bank made 25.0% by number and 4.8% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number, exceeded the 16.9% of owner-occupied housing units located in moderate-income census tracts. M&T's refinance lending in moderate-income census tracts by number exceeded the aggregate, which made 20.1% by number in moderate-income census tracts. M&T's refinance lending in moderate-income census tracts by dollar amount was below the aggregate, which made 18.1% by dollar in moderate-income census tracts.

In 2014-2017, M&T's refinance lending exceeded 2018's performance. In 2014, 2015 and 2016, the bank's refinance lending in low-income census tracts exceeded the demographic and the

aggregate. In 2017, the bank did not make a refinance loan in low-income census tract. M&T's refinance lending in moderate-income census tracts in 2014, 2015 and 2016 exceeded the demographic and the aggregate. The bank's refinance lending in moderate-income tracts in 2017 exceeded the demographic and was comparable to the aggregate.

Small Business

The geographic distribution of small business loans reflected poor penetration throughout the assessment area. In 2018, the bank did not make any small business loans in low-income census tracts where 6.9% of businesses were located. M&T's small business lending in low-income census tracts was also below the aggregate, which made 5.5% by number and 4.2% by dollar in low-income census tracts. In 2018, the bank made 5.1% by number and 2.7% by dollar of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income census tracts was below the demographic of the assessment area where 15.2% of businesses were located in moderate-income census tracts and also was below the aggregate, which made 16.3% by number and 13.5% by dollar in moderate-income census tracts.

In 2014-2017, M&T's small business lending was comparable to 2018's poor performance. The bank did not make any small business loans in low-income census tracts in 2014-2017. In moderate-income census tracts in 2014-2017, small business lending was below the aggregate and the demographic.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes in the MSA 14454 (Boston, MA) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was poor and lending to businesses with gross annual revenues of $1 million or less was very poor. Greater weight was given to the analysis of small business lending based on the overall loan volumes in the assessment area.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels for home purchase loans. The bank did not originate any loans to low-income borrowers in 2018. Performance was below the aggregate lending data, at only 2.9% and significantly below the demographic figure of 25.8% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 12.5% by number and 2.6% by dollar, was consistent with both the aggregate lending data, at 13.1% by number and 7.5% by dollar and the demographic figure of 15.4% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. The bank only originated one loan during the review period to a low-income borrower. The bank's lending to moderate-income borrowers in 2014-2017 was below 2018 performance. The bank's lending was below both the aggregate lending data and the demographic figure, except for 2015 which exceeded both figures.

Refinance

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels for refinance loans. In 2018, the bank did not originate any refinance loans to low-income borrowers, which was below the aggregate lending data, at 5.3% by number and 2.6% by dollar, and significantly below the demographic figure, at 25.8%. The bank's lending to moderate-income borrowers, at 12.5% by number and 2.4% by dollar, was slightly below the aggregate lending data, at 16.1% by number and 10.9% by dollar but comparable to the demographic figure, at 15.4%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. The bank only originated one loan over the review period, in 2016, to a low-income borrower. The bank's lending to moderate-income borrowers in 2014-2017 was also comparable 2018 performance. The bank did not make any refinance loans to moderate-income borrowers in 2014 or 2016. In 2015, the bank's lending to moderate-income borrowers was comparable to the demographic figure and exceeded aggregate performance. In 2017, the bank made one loan to a moderate-income borrower, which was below the demographic figure and aggregate performance.

Small Business

The distribution of borrowers reflected, given the product lines offered, poor penetration among businesses of different sizes for small business loans. In 2018, the bank originated 3.4% of loans by number and 4.8% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending was significantly below the 88.6% of businesses in the assessment area with gross annual revenues of $1 million or less, as well as below the aggregate lending data, at 37.9% by number and 27.8% by dollar. In addition, the bank did not originate any loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was comparable to 2018 lending. Lending to small businesses significantly fell below both aggregate lending and the demographic figure.

Community Development Lending

M&T was a leader in community development lending in MD 14454 (Boston, MA), with 15 loan originations totaling $128.3 million. M&T was ranked 4th of six similarly-situated institutions in terms of annualized community development loan dollar volume, as the institution does not have deposits in the assessment area for comparison.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	1	19,400
Community Services	14	108,929
Total	**15**	**$128,329**

Performance within the MD was directed at community services with 84.9% of all community development activity and affordable housing representing 15.1% of all community development activity. Additionally, $77.5 million in community development loans were made outside of the assessment area, but within the broader statewide and regional area that included the assessment area.

Community development loans included:

- A $19.4 million mortgage loan for improvements to three affordable multi-family properties in a moderate-income tract.
- A $7.0 million line of credit for working capital to a skilled nursing facility serving primarily low- and moderate-income patients.
- A $900,000 term loan to support the purchase and development of a charter school in a low-income tract serving primarily low- and moderate-income students.

INVESTMENT TEST

M&T's performance in MD 14454 (Boston, MA) is based on the following summary. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made rare use of innovative or complex investments to support community development initiatives and exhibited adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 1 qualified investment, consisting of $10 million in the current period, with no prior period investments. M&T ranked sixth out of six similarly-situated banks when comparing annualized community development investment volume in the MD 14454 (Boston, MA).

The qualified investment was a bond for development of a charter school where the majority of students were LMI. The prior period investment was in a qualified academy bond.

Qualified Community Development Investments by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MD 14454 (Boston, MA) - New	0	0	1	10,000	0	0	0	0	1	10,000
MD 14454 (Boston, MA) - Prior Period	0	0	0	0	0	0	0	0	0	0
Total	0	0	1	10,000	0	0	0	0	1	10,000

In addition to the qualified investment, the bank made 72 grants or donations totaling $1.1 million during the evaluation period, as illustrated in the table below. The grants and donations were primarily comprised of funds for community service activities (94.4%).

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MD 14454 (Boston, MA)	5	23,000	60	1,081,892	3	16,000	4	25,000	72	1,145,892

SERVICE TEST

M&T's performance under the service test in MD 14454 (Boston, MA) is rated Needs to Improve. M&T's delivery systems were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in this assessment area, the record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals, and services varied in a way that inconvenienced its assessment area particularly LMI geographies and/or individuals. M&T provided few, if any, community development services in MD 14454 (Boston, MA).

Retail Services

M&T's delivery systems were unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in this assessment area. M&T operated two branches in this assessment area, neither were located in low- or moderate-income tracts. This compared

unreasonably to the 12.7% of the MD's population residing in low-income areas and 24.9% of the population residing in moderate-income areas.

Alternative delivery systems did not enhance the bank's performance in this assessment area group. M&T had no off-site ATM locations in the assessment area.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open nor close a branch within the assessment area.

Services varied in a way that inconvenienced the needs of its assessment area, particularly LMI geographies and/or LMI individuals. Neither of the two branches located in the assessment area had extended or Saturday hours.

Community Development Services

M&T did not provide any community development services in MD 14454 (Boston, MA) assessment area during the review period.

STATE OF NEW JERSEY

CRA RATING FOR NEW JERSEY[10]: 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 supporting the rating include:

Lending Test:

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout the bank's assessment area.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and very small businesses.
- Made an adequate level of community development loans.
- Made limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- An adequate level of qualified community development investments and grants, particularly those not routinely provided by investors, rarely in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.

[10] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

- Exhibited adequate responsiveness to credit and community development needs.

Service Test:

- Delivery systems were readily accessible to the bank's geographies and individuals of different income levels in its assessment areas.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly LMI geographies and/or LMI individuals.
- Services were tailored to convenience and needs of its assessment area, particularly LMI geographies and/or LMI individuals.
- Provided an adequate level of any community development services.

SCOPE OF EXAMINATION

Examiners conducted a full-scope review of MSA 45940 (Trenton, NJ). M&T operated one branch in this assessment area, the only location in the state. Based on very limited lending and deposit activity and a lack of branching in MSA 12100 (Atlantic City, Hammonton, NJ), a limited scope review was conducted.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW JERSEY

The bank's activities in the State of New Jersey made up a low level of M&T's operations and were weighted accordingly when deriving overall ratings. The bank had one branch in the New Jersey assessment areas, representing less than one percent of all branches. In addition, the state contained less than one percent of the bank's total deposit and lending activity.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW JERSEY

LENDING TEST

M&T's lending test performance in the State of New Jersey is rated Low Satisfactory based on performance in MSA 45940 (Trenton, NJ). Lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected adequate penetration throughout the bank's assessment area, the distribution of borrowers reflected, given the product lines offered good penetration among customers of different income levels and businesses of different sizes, and the bank made an adequate level of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in the MSA 45940 (Trenton, NJ) assessment area.

Geographic Distribution

M&T's geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout the State of New Jersey. This conclusion is based on adequate performance in MSA 45940 (Trenton, NJ). There were no significant lending gaps in the assessment area. For details, refer to the Geographic Distribution section of the full-scope MSA 45940 (Trenton, NJ) assessment area**.**

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered good penetration among customers of different income levels and businesses of different sizes in the State of New Jersey based on performance in MSA 45940 (Trenton, NJ).

Community Development Lending

M&T made an adequate level of community development loans throughout the State of New Jersey assessment areas. During the evaluation period, M&T originated four community development loans totaling $22.6 million in the state. Community development lending initiatives targeted community services, affordable housing, and revitalization and stabilization initiatives.

INVESTMENT TEST

M&T's performance under the investment test is rated Low Satisfactory in the State of New Jersey. In the state, M&T had an overall adequate level of qualified investments that exhibited adequate responsiveness to credit and community development needs. This conclusion was based on the bank's performance in MSA 45940 (Trenton, NJ).

M&T made 14 new qualified investments for $35.7 million in the State of New Jersey. In MSA 45940 (Trenton, New Jersey), the bank made one new qualified investment for $485 thousand and maintained period investment balances for $2.6 million, for an overall total of 3.1 million. However, M&T's investment activity in the State of New Jersey was primarily conducted in MSA 12100 (Atlantic City-Hammonton, NJ), which was the evaluated under limited scope procedures, for $29.6 million.

In addition, the bank had prior period investment balances of $5.6 million. Total investments in the State of New Jersey included $8.6 million in investments made to the broader statewide or regional area that included the assessment area.

M&T made extensive use of innovative and/or complex investments to support community development initiatives in the State of New Jersey. Most of qualified investments were LIHTC investments in MSA 12100 (Atlantic City-Hammonton, NJ).

M&T also made $790 thousand in grants and donations to qualified community development organization in the State of New Jersey. Grant activity included $485 thousand in MSA 45940 (Trenton, New Jersey), included $1,400.00 in MSA 12100 (Atlantic City-Hammonton, NJ) and the remainder of $304 thousand made in the broader statewide and regional area.

SERVICE TEST

M&T's performance under the service test in the New Jersey assessment area is rated High Satisfactory. This conclusion is based on performance in MSA 45940 (Trenton, NJ). M&T's delivery systems were readily accessible to portions of geographies and individuals of different income levels in this assessment area. Alternative delivery systems did not enhance the bank's performance in this assessment area group. Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. Hours and services were tailored to the conveniences and needs of the bank's assessment area, particularly LMI geographies and/or LMI individuals. The bank provided an adequate level of community development services.

Summary of Key Assessment Area Data: New Jersey			
	MSA 12100	**MSA 45940**	**New Jersey Totals**
Total Population[4]	**275,376**	**370,212**	**645,588**
Population % of AA population	**42.7%**	**57.3%**	**100.0%**
Families	**68,395**	**88,299**	**156,694**
Families % of AA families	**43.6%**	**56.4%**	**100.0%**
Total Census Tracts[4]	**70**	**77**	**147**
Tracts % AA tracts	**47.6%**	**52.4%**	**100.0%**
LMI tracts	**25**	**33**	**58**
LMI tracts % all AA LMI tracts	**43.1%**	**56.9%**	**100.0%**
Total Owner-Occupied Units[4]	**68,194**	**43,168**	**111,362**
Units % of AA units	**61.2%**	**38.8%**	**100.0%**
Business Establishments[5]	**12,267**	**18,148**	**30,415**
Bus. est. % AA bus. est.	**40.3%**	**59.7%**	**100.0%**
Number of Branches[1]	**0**	**1**	**1**
Branches % all branches	**0%**	**100%**	**100%**
Branches in LMI tracts	**0**	**1**	**1**
LMI branches % AA LMI branches	**0.0%**	**1.1%**	**100.0%**
Branch Deposits ($'000s)[2]	**0**	**90**	**90**
Deposits % AA deposits	**0.0%**	**100.0%**	**100.0%**
Deposit Market Share (%)/ Rank in Mkt.	**0.0%**	**0.6% 18/26**	**.01% 51/52**
Home Purchase Originations[3]	**9**	**12**	**21**
HP originations % AA orig.	**42.9%**	**57.1%**	**100.0%**
Refinance Originations[3]	**6**	**6**	**12**
Refi orig. % AA orig.	**50.0%**	**50.0%**	**100.0%**
Home Improvement Originations[3]	**0**	**3**	**3**
Home Improvement orig. % AA orig.	**0.0%**	**0.0%**	**0.0%**
Small Business Originations[3]	**7**	**20**	**27**
SB orig. % AA orig.	**25.9%**	**74.1%**	**100.0%**
Combined Loan Totals	**22**	**41**	**63**
% of AA Orig.	**34.9%**	**65.1%**	**100.0%**

(1) Branch numbers are as of 12/31/2018. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/2018. (3) Originations are loans reported under HMDA or CRA small business reporting for 2018. (4) Demographic information was obtained from the 2015 ACS. (5) Business establishments information was reported by D&B for 2018.

METROPOLITAN AREA

(Full Review)

MSA 45940 (TRENTON, NJ)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 45940 (TRENTON, NJ)

M&T operated one branch located in a moderate-income census tract. As detailed in Exhibit I, as of June 30, 2018, the assessment area contained the only New Jersey State branch and 100% of the deposits in the state. The assessment area contained 65.1% of the total lending activity in New Jersey. Therefore, state conclusions are entirely based on performance in this assessment area.

Community Contact

To learn more about community credit needs, examiners conducted a community contact with one nonprofit agency with a mission to provide safe and affordable housing within the assessment area. The contact noted that affordable housing remains a challenge in the assessment area, particularly for low-income residents. The contact indicated that financial education is a need in the assessment area residents need to be informed of financial products. In addition, due to the COVID-19 pandemic, the contact noted an increase in evictions which has presented additional housing related issues, particularly for low-income residents. Finally, the contact noted local financial institutions are generally engaged in the community and have been responsive to the need for financial education by hosting financial education seminars.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 45940 (Trenton, NJ) consisted of Mercer County, which is also the MSA in its entirety. According to the 2015 ACS, MSA 45940's population totaled 370,212. The MSA contained 57.3% of the bank's New Jersey State combined assessment area population.

In 2018, of the 77 census tracts in the assessment area, 18 or 23.4%, were low-income, 15 or 19.5% were moderate-income, 19 or 24.7% were middle-income, 24 or 31.2% were upper-income and one or 1.3% were of unknown income.

Income Characteristics

The MSA 45940 (Trenton, NJ) assessment area had 88,299 families, of which 23.9% (8.0% of which were below the poverty level) were considered low-income, 16.6% were moderate-income, 18.5% were middle-income, and 41.1% were upper-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Metropolitan Division	**2010**	**2015**
Assessment Area	$88,694	$94,908
State of New Jersey	$84,904	$88,335

Housing Characteristics

The 2015 ACS showed that MSA 45940 (Trenton, NJ) had 143,833 housing units, of which 58.4% were owner-occupied and 32.3% were rental units. Of the available owner-occupied units, 24.2% were in LMI areas. In low-income census tracts, 54.5% of the housing units were rental units, 20.2% vacant, and 25.3% were owner-occupied. In moderate-income census tracts, 50.0% of the housing units were either rental or vacant, and 50.0% were owner-occupied.

The 2015 ACS showed that the median age of housing stock in the assessment area was 52 years old, with 29.4% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans. The median housing value in the assessment area was $276,506, with an affordability ratio of 26.3. The median gross rent in the assessment area was $1,132 per month. Within the assessment area, 50.1% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$309,348	22.9	$276,506	26.3	$1,047	$1,132	8.1%
State of New Jersey	$357,000	19.6	$315,900	22.8	$1,092	$1,192	9.2%

Labor, Employment and Economic Characteristics

Government (state, county, and municipal) formed the single largest employment sector in Trenton. Other significant economic areas included manufacturing, trade, and services. Trenton's set of unique circumstances contributed to its continued growth: the city benefits from the spill-

over of high-technology industries and research centers locating along the Route 1 corridor; land costs, rents, and taxes in Trenton are a fraction of those in New York City, yet Trenton remains an acceptable commute for much of the Northeast Corridor.

According to D&B data, the assessment area had a total of 18,148 businesses in 2018, of which 16,077 (88.6%) were small businesses with GAR of $1 million or less.

Unemployment rates improved significantly over the review period, indicating improving economic conditions and potential lending opportunities.

U.S. Department of Labor
Annual Unemployment Rates

Area	2014	2015	2016	2017	2018
MSA 45940 (Trenton, NJ)	5.9	5.0	4.3	4.1	3.6
Mercer County	5.9	5.0	4.3	4.1	3.6
State of New Jersey	6.8	5.8	5.0	4.6	4.1

Additional performance context information can be found on the following Assessment Area Demographic Report:

Assessment Area Demographics

Assessment Area: MSA 45940 (Trenton-Princeton, NJ) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	18	23.4	11,991	13.6	3,219	26.8	21,071	23.9
Moderate-income	15	19.5	16,032	18.2	1,938	12.1	14,681	16.6
Middle-income	19	24.7	25,702	29.1	1,159	4.5	16,294	18.5
Upper-income	24	31.2	34,574	39.2	721	2.1	36,253	41.1
Unknown-income	1	1.3	0	0	0	0	0	0
Total Assessment Area	**77**	**100.0**	**88,299**	**100.0**	**7,037**	**8.0**	**88,299**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	24,294	6,141	7.3	25.3	13,237	54.5	4,916	20.2
Moderate-income	28,499	14,236	16.9	50	10,888	38.2	3,375	11.8
Middle-income	41,392	27,113	32.3	65.5	11,581	28	2,698	6.5
Upper-income	49,648	36,555	43.5	73.6	10,795	21.7	2,298	4.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**143,833**	**84,045**	**100.0**	**58.4**	**46,501**	**32.3**	**13,287**	**9.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,515	8.3	1,313	8.2	167	9.2	35	13.9
Moderate-income	2,876	15.8	2,553	15.9	259	14.2	64	25.4
Middle-income	5,889	32.4	5,236	32.6	586	32.2	67	26.6
Upper-income	7,868	43.4	6,975	43.4	807	44.4	86	34.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**18,148**	**100.0**	**16,077**	**100.0**	**1,819**	**100.0**	**252**	**100.0**
	Percentage of Total Businesses:			**88.6**		**10.0**		**1.4**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 45940 (TRENTON, NJ)

LENDING TEST

M&T's performance under the lending test in MSA 45940 (Trenton, NJ) is based on the following summary. M&T's lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected adequate penetration throughout the bank's assessment area, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made an adequate level of community development loans.

Greater weight was given to the analysis of home purchase and refinance lending in the analysis of geographic and borrower distribution based on loan volumes. Home improvement loans were not evaluated as lending volumes were insufficient for meaningful analysis. No comparisons to prior evaluation performance was done as this assessment area is new since the previous evaluation.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MSA 45940 (Trenton, NJ). The conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in both HMDA-related and small business lending was considered adequate. For the five-year evaluation period, lending activity totaled 245 loans consisting of 122 home purchase, 64 refinance, 3 home improvement and 56 small business loans. Analysis of aggregate lending for the evaluation period indicated an increase in lending volume overall.

M&T's market share of deposits increased over the review period, while lending was stable overall. In 2018, M&T had a deposit market share of 0.6%, and lending market shares of 0.3% in both home purchase and refinance lending, 0.5% in home improvement, and 0.2% in small business lending. In comparison, the deposit market share in 2014 was 0.0%, with lending market shares of 0.6% in both home purchase and refinance lending, 0.0% in home improvement lending, and 0.2% in small business lending.

Geographic Distribution

M&T's geographic distribution of HMDA-related and small business loans reflected adequate penetration in the MSA 45940 (Trenton, NJ) assessment area. Lending penetration in LMI census tracts was good for home purchase loans due to overall performance during the review period, adequate for refinance loans while small business lending was very poor. Greater weight, however, was given to HMDA lending based on loan volumes. Home improvement lending was not evaluated as the volume of lending was insufficient to analyze.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 39.0% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 5.6% of low-income census tracts and 26.7% of moderate-income census tracts. Overall penetration of different income levels in 2017 was similar at 37.7% and was 48.1% in 2016. Overall penetration of different income levels in 2015 was 39.0% while 2014 was 45.5%.

MSA 45940 (Trenton, NJ)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	18	17	5.6%
Moderate	15	11	26.7%
Middle	19	10	47.4%
Upper	24	8	66.7%
Unknown	1	1	0.0%
Total Tracts	77	47	39.0%
2017			
Low	18	16	11.1%
Moderate	15	7	53.3%
Middle	19	10	47.4%
Upper	24	14	41.7%
Unknown	1	1	0.0%
Total Tracts	77	48	37.7%
2016			
Low	15	12	20.0%
Moderate	14	7	50.0%
Middle	23	8	65.2%
Upper	24	12	50.0%
Unknown	1	1	0.0%
Total Tracts	77	40	48.1%
2015			
Low	15	12	20.0%
Moderate	14	8	42.9%
Middle	23	12	47.8%
Upper	24	14	41.7%
Unknown	1	1	0.0%
Total Tracts	77	47	39.0%
2014			
Low	15	12	20.0%
Moderate	14	6	57.1%
Middle	23	9	60.9%
Upper	24	14	41.7%
Unknown	1	1	0.0%
Total Tracts	77	42	45.5%

Home Purchase

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area based on overall performance during the review period. However, in 2018, M&T did not make any home purchase loans in low-income census tracts while 7.3% of all owner-occupied housing units were in low-income census tracts. Home purchase performance was below

the aggregate which made 3.2% by number and 1.0% by dollar in low-income census tracts. In 2018, the bank made 25.0% by number and 11.8% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts exceeded the 16.9% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate, which made 17.3% by number and 10.1% by dollar in moderate-income census tracts.

Home purchase performance in 2014-2017 exceeded 2018's performance in low- and moderate-income tracts. In 2014-2017, the bank's home purchase lending in low-income census tracts exceeded the demographic and the aggregate. In moderate-income census tracts, home purchase performance in 2014-2017 exceeded the demographic and the aggregate, as well.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank made one (16.7%) refinance loan in a low-income census tract making up 2.6% by dollar volume. The bank's refinance lending in low-income census tracts exceeded the 7.3% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate which made 2.8% by number and 1.1% by dollar in low-income census tracts. In 2018, the bank also made one refinance loan (16.7%) in a moderate-income tract, which was comparable to the 16.9% of owner-occupied housing units in moderate-income census tracts. The bank's performance exceeded the aggregate, which made 11.8% by number and 6.9% by dollar in moderate-income census tracts.

M&T's refinance lending in 2014-2017 was generally consistent with 2018. In 2017, the bank did not make any refinance loans in low-income census tracts. In 2014-2016, the bank made one refinance loan in each year in low-income census tracts. Performance was comparable to the demographic but exceeded the aggregate. The bank's refinance lending in moderate-income census tracts in 2014-2016 exceeded the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2017 was below the demographic but similar to the aggregate.

Small Business

The geographic distribution of small business loans reflected very poor penetration throughout the assessment area. In 2018, the bank did not make any small business loans in low- or moderate-income census tracts. The bank's small business lending was below the demographics of the assessment area where 8.4% and 15.8% of businesses were in low- and moderate-income census tracts, respectively. The aggregate made 6.0% and 13.9% by number in low- and moderate-income census tracts.

M&T's small business lending in 2014-2017 was consistent with 2018's performance. The bank made one small business loan in a moderate-income census tract 2017. No other small business loans were made in low- or moderate-income census tracts.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 45940 (Trenton, NJ) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was adequate and lending to businesses with gross annual revenues of $1 million or less was good. Greater weight was given to the analysis of the bank's HMDA lending based on the loan volumes. It should be noted, however, that home improvement lending was not considered as volume was insufficient to obtain meaningful conclusions.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. While the bank's 2018 lending to low-income borrowers of 8.3% by number and 3.6% by dollar was below the demographic figure of 23.9% of low-income families in the assessment area, performance was comparable to the aggregate lending data, at 10.2% by number and 4.7% by dollar. The bank's lending to moderate-income borrowers, at 41.7% by number and 21.8% by dollar, was significantly above both the aggregate lending data, at 22.4% by number and 15.1% by dollar and the demographic figure, at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 exceeded bank's 2018 lending performance. Lending to low-income borrowers exceeded both the aggregate data lending and the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending exceeded both the aggregate and demographic figure in all years except for 2017, which was below both the aggregate lending data and the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels for refinance loans based on performance in 2014-2017. The bank's 2018 lending to low-income borrowers was 16.7% by number and 6.4% by dollar and was above the aggregate lending data of 7.8% by number and 4.3% by dollar. However, performance was below the demographic figure of low-income families in the assessment area, at 23.9%. In 2018, the bank did not originate any home refinance loans to moderate-income borrowers, which fell below both the aggregate lending data, at 16.4% by number and 10.6% by dollar and the demographic figure of moderate-income families in the assessment area, at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. The bank did not originate any refinance loans to low-income borrowers in 2014-2017, falling below both the performance of aggregate lending data and the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was above the 2018 performance. However, the bank's performance was below both aggregate data and the demographic figure and the bank did not make a loan to a moderate-income borrower in 2017.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes. In 2018, the bank originated 70.0% of loans by number and 24.4% by dollar volume to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data, at 41.2% by number but was below the 30.5% by dollar. Performance was below the percentage of businesses in the assessment area with gross annual revenues of $1 million or less, at 88.6%. The bank originated 65.0% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. The bank's lending exceeded aggregate lending data in 2014 and 2015, was comparable to aggregate lending data in 2016 and was slightly below aggregate lending date in 2017. Performance was below the demographic figure in each year.

Community Development Lending

M&T made an adequate level of community development loans in the MSA 45940 (Trenton, NJ) assessment area. The bank made one loan for $2.0 million for capital improvements to revitalize a moderate-income area. Given the bank's limited presence in the assessment area, the bank's responsiveness was determined to be adequate and community development loans made outside of the assessment area, benefitting the regional area including the assessment area were considered. The bank made three loans in the regional area including the assessment area, totaling $20.6 million, primarily targeted to community services.

INVESTMENT TEST

M&T's performance in the MSA 45940 (Trenton, NJ) is based on the following summary. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 23 qualified investments totaling $3.1 million, in the State of New Jersey. Investments consisted of three investments for $485 thousand during the current period and 20 investments for $2.6 million outstanding from the prior period. When compared to five similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked second.

One new qualified investment was a State of New Jersey Revitalization Tax Credit investment benefitting a moderate-income area in Trenton, NJ. Prior period investments were all mortgage backed securities that benefited the assessment area in response to the need of affordable housing.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 45940 (Trenton, NJ) - New	0	0	0	0	0	0	3	485	3	485
MSA 45940 (Trenton-n, NJ) - Prior Period	20	2,645	0	0	0	0	0	0	20	2,645
Total	20	2,645	0	0	0	0	3	485	23	3,130

In addition to the qualified investments, the bank made 19 grants or donations totaling $485 thousand during the evaluation period, as illustrated in the table below. The grants and donations were primarily comprised of funds for community service activities and economic development.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 45940 (Trenton, NJ)	2	180,000	9	132,300	7	$83,000	1	90,000	19	485,300

SERVICE TEST

M&T's performance under the service test in MSA 45940 (Trenton, NJ) is based on the following summary. M&T's delivery systems that were readily accessible to the bank's geographies and individuals of different income levels in the MD, changes in branch locations that did not adversely affect the accessibility of its delivery systems particularly to LMI geographies and/or individuals, services were tailored to the convenience and needs of its assessment area particularly to LMI

geographies and/or individuals and the bank provided an adequate level of community development services.

Retail Services

M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in the assessment area. M&T operated one branch in this assessment area, which was in a moderate-income area.

Alternative delivery systems did not enhance the bank's performance in this assessment area group. M&T did not have any off-site ATM locations.

Changes in branch locations generally did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

Services were tailored to the convenience and needs of the assessment area, particularly LMI geographies and/or LMI individuals. The one branch had late and Saturday hours.

Community Development Services

M&T provided an adequate level of community development services during the evaluation period in MSA 45940 (Trenton, NJ). The table reflects the number and type of services provided by the bank, which was comprised of mostly financial education seminars. Management and staff served on the board of directors for six nonprofit and community-based organizations located within this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Financial Education	98
Technical Assistance	0
Small Business Seminars	0
Board Participation	6
Total	**104**

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 12100 (ATLANTIC CITY-HAMMONTON, NJ)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 12100 (ATLANTIC CITY-HAMMONTON, NJ)

A limited evaluation of M&T's performance in MSA 12100 (Atlantic-City Hammonton, NJ) was conducted. Located in Southern New Jersey, the assessment area had a population of 275,376 or 42.7% of the total population of the bank's combined New Jersey assessment areas, and 40.3% of its business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 12100 (Atlantic-City-Hammonton, NJ)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	9	12.9	3.4	22.8
Moderate Income	16	22.9	16.3	17.0
Middle Income	21	30.0	39.3	18.5
Upper Income	22	31.4	40.1	41.7
Unknown	2	2.9	1.0	0.0
Total	**70**	**100.0**	**100.0**	**100.0**

During 2018, 34.4% of M&T's New Jersey lending activity was conducted in this assessment area. M&T did not have any branch locations in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 12100 (ATLANTIC CITY-HAMMONTON, NJ)

The overall lending test rating for the State of New Jersey is rated Low Satisfactory. M&T's lending test performance in the assessment area was consistent with the state level performance. Both geographic distribution and borrower distribution were adequate. Community development lending performance was also adequate. Investment test performance was above the Low Satisfactory rating in the state. The bank made three current period investments totaling $28.2 million and prior period MBS totaling $1.3 million. The bank also made 1 grant for $1,400. Service test performance was below the High Satisfactory rating for the State of New Jersey, as the bank did not have a branch in the MSA and did not have any community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 12100 (Atlantic-City Hammonton, NJ)	Consistent	Above	Below

STATE OF NEW YORK

CRA RATING FOR NEW YORK[11]: OUTSTANDING

The Lending test is rated: High Satisfactory

The Investment test is rated: Outstanding

The Service test is rated: Outstanding

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the bank's assessment areas.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited a good record of serving the credit needs of low-income individuals and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- An excellent level of qualified investments and grants particularly those not routinely provided by investors, often in a leadership position.
- Made extensive use of innovative and/or complex investments to support community development initiatives.
- Exhibited excellent responsiveness to credit and community development needs.

[11] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

Service Test:

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in the assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced its assessment areas particularly in LMI geographies and/or LMI individuals.
- A leader in providing community development services.

SCOPE OF EXAMINATION

Examiners conducted full-scope reviews of the following four assessment areas in New York State: MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY), MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and MSA 10580 (Albany-Schenectady-Troy, NY). M&T's combined full-scope areas made up 90.2% of the deposits and 76.5% of the loans originated in the New York assessment areas during the review period. To derive the state rating, full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. Limited-scope reviews were conducted of the remaining New York assessment areas:

- MSA 13780 (Binghamton, NY)
- MSA 46540 (Utica-Rome, NY)
- MSA 28740 (Kingston, NY)
- MSA 27060 (Ithaca, NY)
- MSA 21300 (Elmira, NY)
- MSA 48060 (Fort Drum-Watertown, NY)
- NY Nonmetropolitan Area Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties)
- NY Nonmetropolitan Area Group B (Cayuga, Chenango, Seneca, and Cortland Counties)
- NY Nonmetropolitan Area Group C (Sullivan County)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW YORK

M&T's performance in the New York State assessment areas received the most weight in deriving the bank's overall CRA performance rating due to the bank's significant branching, lending, and deposit activity in the state. As detailed in Exhibit I, 23.3% of branches and 44.1% of branch deposits were located in the New York State assessment areas. Furthermore, 49.0% of home purchase loans, 33.3% of refinance loans, 34.4% of home improvement loans, and 31.1% of small business loans were originated in the New York State assessment area in 2018.

M&T had a 2.8% deposit market share and ranked 8th in New York State. Other banks operating in this New York State assessment area with significant deposit market share as of June 30, 2018, were JP Morgan Chase N.A., HSBC Bank USA N.A., RBS Citizens Bank N.A., KeyBank N.A., and Bank of America N.A. M&T had 175 branches within the State of New York.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF NEW YORK

LENDING TEST

M&T's lending test performance in the State of New York is rated High Satisfactory. M&T's lending levels reflected good responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

Lending Activity

M&T's lending levels reflected good responsiveness to assessment area credit needs when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in each assessment area. This conclusion is based on good lending responsiveness to assessment area credit needs in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY), and adequate lending responsiveness to assessment area credit needs in MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and in MSA 10580 (Albany-Schenectady-Troy, NY).

Geographic Distribution

M&T's geographic distribution of HMDA-related and small business loans reflected good penetration throughout the State of New York. This conclusion is based geographic distribution of HMDA-related and small business loans that reflected good penetration throughout MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY), MSA 40380 (Rochester, NY), and MSA 45060 (Syracuse, NY), and MSA 10580 (Albany-Schenectady-Troy, NY). There were no significant

lending gaps in the assessment areas. For details, refer to the Geographic Distribution section of each full-scope assessment area.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in New York State. This conclusion is based on the fact that the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) and MSA 40380 (Rochester, NY).

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in MSA 10580 (Albany-Schenectady-Troy) and MSA 45060 (Syracuse, NY).

Community Development Lending

M&T was a leader in community development lending in New York State. This conclusion is based on the bank being a leader in making community development loans in all four full scope assessment areas: MSA 15380 (Buffalo-Niagara Falls, NY), MSA 40380 (Rochester, NY), MSA 45060 (Syracuse, NY), and MSA 10580 (Albany-Schenectady-Troy, NY).

During the evaluation, M&T originated 334 community development loans totaling $2.0 billion in the State of New York. Community development lending efforts were included all areas of community development, particularly the revitalization or stabilization of low- and moderate-income census geographies and community services.

M&T was considered responsive to the credit and community development needs in the state; therefore, positive consideration was given to community development lending benefiting the broader statewide or regional area including the assessment area. During this evaluation period, M&T made three qualified community development loans totaling $28.5 million outside of the bank's New York State assessment areas. These loans supported affordable housing, economic development, and revitalization projects that benefited counties within the state, but outside of M&T's delineated assessment areas.

INVESTMENT TEST

M&T's performance under the investment test in New York is rated Outstanding. In the state, M&T had an overall excellent level of qualified community development investments, made extensive use of innovative and/or complex investments to support community development initiatives and exhibited excellent responsiveness to credit and community development needs.

M&T made 57 new qualified investments, totaling $546.0 million in the State of New York. Current period investments were concentrated in MSA 15380 (Buffalo-Niagara Falls, NY) with

$142.2 million, MSA 40380 (Rochester, NY) with $119.6 million, MSA 45060 (Syracuse, NY) with $28.2 million, and MSA 10580 (Albany-Schenectady-Troy, NY) with $123.1 million. The remainder of current period investments were made in limited scope assessment areas and the broader statewide or regional area that included the assessment area.

In addition, M&T had $51.6 million in prior period investments. M&T was considered responsive to the credit and community development needs in its assessment areas in the State of New York; therefore, investments outside of M&T's assessment areas benefitting the broader statewide or regional area including the assessment area were considered. M&T's investment activity included $47.2 million in qualified investments to the broader statewide or regional area, including its assessment areas.

In addition to qualified investments, M&T made $10.6 million in donations and grants to community development organizations in its assessment areas over the review period. The bank had $380 thousand in grants benefitting the broader statewide or regional area, including its assessment area.

SERVICE TEST

M&T's performance under the service test in New York State is rated Outstanding and was weighted towards M&T's leadership in community development services across its assessment areas.

This test considered the following criteria of retail and community development services in full scope assessment areas.

Retail Services

Retail delivery systems were accessible to the bank's geographies, including LMI geographies and individuals of different income levels, in the institution's assessment areas.

M&T had 175 branches in New York, which represented 23.3% of M&T's total branches. M&T's record of opening and closing offices did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. Services did not vary in a way that inconvenienced the assessment areas particularly LMI geographies and/or individuals in the full scope assessments areas in the New York State.

Community Development Services

M&T was a leader in providing community development services in New York.

Summary of Key Assessment Area Data: New York State Assessment Areas														
	MSA 15380	MSA 40380	MSA 45060	MSA 13780	MSA 10580	MSA 46540	MSA 28740	MSA 27060	MSA 21300	MSA 48060	Non Metro Group A	Non Metro Group B	Non Metro Group C	New York Totals
Total Population[4]	1,135,734	1,057,969	540,731	248,292	845,933	297,592	181,300	103,855	88,267	118,947	459,247	212,909	76,330	5,367,106
Population % of AA population	21.2%	19.7%	10.1%	4.6%	15.8%	5.5%	3.4%	1.9%	1.6%	2.2%	8.6%	4.0%	1.4%	100.0%
Families	284,789	262,179	129,938	60,778	200,849	73,125	43,342	20,250	21,951	30,116	118,065	51,622	17,832	1,314,836
Families % of AA families	21.7%	19.9%	9.9%	4.6%	15.3%	5.6%	3.3%	1.5%	1.7%	2.3%	9.0%	3.9%	1.4%	100.0%
Total Census Tracts[4]	299	267	156	65	210	93	47	23	22	26	126	54	24	1,412
Tracts % AA tracts	21.2%	18.9%	11.0%	4.6%	14.9%	6.6%	1.6%	1.6%	1.6%	1.8%	8.9%	3.8%	1.7%	100.0%
LMI tracts	100	88	47	17	60	24	8	4	7	5	14	5	4	383
LMI tracts % all AA LMI tracts	26.1%	23.0%	12.3%	4.4%	15.7%	6.3%	2.1%	1.0%	1.8%	1.3%	3.7%	1.3%	1.0%	100.0%
Total Owner-Occupied Units[4]	311,183	282,578	140,284	67,577	215,410	78,231	47,908	21,356	24,286	24,610	131,305	58,407	18,611	1,421,746
Units % of AA units	21.9%	19.9%	9.9%	4.8%	15.2%	5.5%	3.4%	1.5%	1.7%	1.7%	9.2%	4.1%	1.3%	100.0%
Business Establishments[5]	44,981	40,964	21,213	8,300	35,558	9,487	8,668	3,986	2,681	3,561	15,145	7,145	2,774	204,463
Bus. est. % AA bus. est.	22.0%	20.0%	10.4%	4.1%	17.4%	4.6%	4.2%	1.9%	1.3%	1.7%	7.4%	3.5%	1.4%	100.0%
Number of Branches[1]	50	27	28	13	13	11	5	2	1	1	18	4	2	175
Branches % all branches	28.6%	15.4%	16.0%	7.4%	7.4%	6.3%	2.9%	1.1%	0.6%	0.6%	10.3%	2.3%	1.1%	100%
Branches in LMI tracts	14	4	4	5	3	1	1	0	0	0	4	1	0	37
LMI branches % AA LMI branches	37.8%	10.8%	10.8%	13.5%	8.1%	2.7%	2.7%	0.0%	0.0%	0.0%	10.8%	2.7%	0.0%	100.0%
Branch Deposits ($'000,000s)[2]	26,741	3,937	3,057	1,520	1,633	689	353	230	21	29	773	140	77	39,200
Deposits % AA deposits	68.2%	10.0%	7.8%	3.9%	4.2%	1.8%	0.9%	0.6%	0.1%	0.1%	2.0%	0.4%	0.2%	100.0%
	62.8%	20.9%	24.6%	47.3%	5.6%	15.9%	11.0%	11.2%	2.0%	1.8%	10.3%	4.3%	5.39%	39.4%
Deposit Market Share (%)/ Rank	1/16	1/20	1/16	1/8	5/24	2/10	3/19	2/10	5/7	7/10	4/26	9/15	8/10	1/76
Home Purchase Originations[3]	1,894	607	170	173	195	103	64	22	16	27	292	84	25	3,672
HP originations % AA orig.	51.6%	16.5%	4.6%	4.7%	5.3%	2.8%	1.7%	0.6%	0.4%	0.7%	8.0%	2.3%	0.7%	100.0%
Refinance Originations[3]	1,135	378	284	178	85	108	68	26	3	10	185	74	10	2,544
Refi orig. % AA orig.	44.6%	14.9%	11.2%	7.0%	3.3%	4.2%	2.7%	1.0%	0.1%	0.4%	7.3%	2.9%	0.4%	100.0%
Home Improvement Originations[3]	798	232	143	65	37	55	12	7	0	7	113	28	16	1,513
Home Improvement orig. % AA orig.	52.7%	15.3%	9.5%	4.3%	2.4%	3.6%	0.8%	0.5%	0.0%	0.5%	7.5%	1.9%	1.1%	100.0%
Small Business Originations[3]	1,264	903	576	220	229	194	139	61	14	13	245	69	18	3,945
SB orig. % AA orig.	32.0%	22.9%	14.6%	5.6%	5.8%	4.9%	3.5%	1.5%	0.4%	0.3%	6.2%	1.7%	0.5%	100.0%
Combined Loan Totals	5,091	2,120	1,173	636	546	460	283	116	33	57	835	255	69	11,674
% of AA Orig.	43.6%	18.2%	10.0%	5.4%	4.7%	3.9%	2.4%	1.0%	0.3%	0.5%	7.2%	2.2%	0.6%	100.0%

(1) Branch numbers are as of 12/31/2018. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/2018. (3) Originations are loans reported under HMDA or CRA small business reporting for 2018. (4)Demographic information was obtained from the 2015 ACS. (5)Business establishments information was reported by D&B for 2018.

METROPOLITAN AREA

(FULL REVIEW)

MSA 15380 (BUFFALO-CHEEKTOWAGA-NIAGARA FALLS, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 15380 (BUFFALO-CHEEKTOWAGA-NIAGARA FALLS, NY)

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) contained the largest proportion of M&T's branches, loans, and deposits in New York, and includes the City of Buffalo, where the bank has its headquarters. As of December 31, 2018, M&T operated 50 branches in the MSA, representing 28.6% of the bank's branches in New York. Of the bank's total HMDA-related and small business originations in the State of New York, 43.6% of total HMDA-related and small business originations were made in this MSA.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) was a highly competitive market and home to some of the largest banking institutions in the United States. M&T captured a deposit market share of 62.8%, ranking 1st in deposits among the 16 depository institutions operating in this assessment area. This represented the highest percentage of deposits among all of M&T's assessment areas within the State of New York, as well as the highest percentage of deposits in M&T's overall CRA footprint. Other lead banks in terms of deposit market share were Key Bank N.A., Bank of America N.A., RBS, Citizens Bank N.A., Evans Bank N.A., and Northwest Bank.

Community Contacts

To learn more about community credit needs, examiners conducted community contacts with two nonprofit agencies.

One community contact was conducted with a nonprofit organization that administers the Section 8 Housing program in Erie and Niagara Counties. The organization owns, builds, develops, and manages affordable housing in seven western New York counties. The organization is a certified Housing Counselor, administers first-time homeownership programs, and manages over 1500 units of affordable housing. The contact noted that several banks including M&T and Key Bank have been very active in affordable housing within the area and are LIHTC investors. The contact identified financial education for LMI borrowers as a need in the area and indicated that banks should help to provide more homebuyer education opportunities. Foreclosure prevention and affordable multifamily housing were also noted as important needs in the area.

A second contact was made with another nonprofit agency with a mission that focuses on providing affordable housing in both MSA 15380 MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) and MSA 40380 (Rochester, NY). The contacted indicated a need for more rehab loans as many

of the homes in the assessment area are old and have deteriorated. The contact also indicated a need for more loans for multifamily properties that provide affordable rental housing.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, HUD, and the FFIEC.

Demographic Characteristics

M&T's assessment area in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) consisted of Erie and Niagara Counties. According to the 2015 ACS, the population of the assessment area was approximately 1,135,734, with 81.1% residing in Erie County, which included the City of Buffalo. Niagara County and also included the less densely populated City of Niagara Falls. The City of Buffalo currently is the 87th largest city in the United States and the second most populous city in the state after New York City. The assessment area contained 21.2% of the bank's New York State combined assessment area population.

In 2018, of the 299 census tracts in the assessment area, 46 or 15.4%, were low-income, 54 or 18.1% were moderate-income, 119 or 39.8% were middle-income, 70 or 23.4% were upper-income and 10 or 3.3% were of unknown income.

Income Characteristics

In 2018, the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area had 284,789 families, of which 22.2% were considered low-income, 16.6% were moderate-income and 10.7% were below the poverty level. The FFIEC median incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$62,530	$67,108
Erie County	$63,404	$67,607
Niagara County	$59,471	$65,275
State of New York	$67,405	$90,087

Housing Characteristic

In 2018, MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) had 519,952 housing units, of which 59.8% were owner-occupied and 30.7% were rental units. Of the available owner-occupied

units, 18.3% were in LMI areas. In low-income census tracts, 51.4% of the housing units were rental units, 19.8% vacant, and 28.8% were owner-occupied. In moderate-income census tracts, 54.6% of the housing units were either rental or vacant, and 45.4% were owner-occupied.

In 2018, the median age of housing stock in the assessment area was 61 years old, with 41.5% of the stock built before 1950. The median age of housing stock was also 61 years in low- and moderate-income tracts indicating a potential need for home improvement loans.

In 2018, the median housing value in the assessment area was $125,014, with an affordability ratio of 40.8. The median gross rent in the assessment area was $726 per month. Within the assessment area, 46.9% of all renters had rental costs that exceeded 30% of their incomes. The table below presents housing characteristics from the 2010 Census and the 2015 ACS for the assessment area and Erie and Niagara County and the State of New York.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$113,883	41.3	$125,014	40.9	$673	$726	7.9%
Erie County	$117,700	40.3	$130,000	39.4	$686	$733	6.9%
Niagara County	$97,600	47.1	$108,000	46.0	$614	$654	6.5%
State of New York	$303,900	18.3	$283,400	20.9	$977	$1,132	15.9%

Labor, Employment and Economic Characteristics

According to D&B data, the assessment area had a total of 44,981 businesses in 2018, of which 39,926 (88.8%) were small businesses with GAR of $1 million or less.

The loss of traditional jobs in manufacturing, rapid suburbanization, and high costs of labor have led to economic decline, particularly in the steel industry. The MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area's key industries were primarily durable goods manufacturing. As manufacturing's share of the local economy has declined, health and education, as well as other service industries, have accounted for a greater share of the economy. According to the New York State Department of Labor, Western New York had experienced seven consecutive years of job growth as of June 2018. Leisure and hospitality, education and health services, and financial activities sectors were responsible for most of the region's employment growth between 2013 and 2017.

Unemployment in the assessment area was steady from 2015-2017 and fell more sharply from 2014 to 2015 and from 2017 to 2018, indicating lending opportunities may have increased over

the review period as economic conditions improved. The table below shows the trends in the unemployment rate over the review period.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	6.3	5.5	5.1	5.3	4.6
Erie County, NY	6.1	5.3	4.9	5.2	4.4
Niagara County, NY	7.0	6.1	5.8	6.2	5.2
State of New York	6.3	5.3	4.9	4.7	4.2

Additional performance context data for this assessment area is provided in the subsequent MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: Buffalo-Cheektowaga-Niagara Falls, NY - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	46	15.4	32,553	11.4	12,658	38.9	63,111	22.2
Moderate-income	54	18.1	36,407	12.8	6,619	18.2	47,385	16.6
Middle-income	119	39.8	115,776	40.7	8,308	7.2	57,838	20.3
Upper-income	70	23.4	99,885	35.1	2,858	2.9	116,455	40.9
Unknown-income	10	3.3	168	0.1	55	32.7	0	0
Total Assessment Area	**299**	**100.0**	**284,789**	**100.0**	**30,498**	**10.7**	**284,789**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	74,129	21,331	6.9	28.8	38,133	51.4	14,665	19.8
Moderate-income	78,092	35,439	11.4	45.4	31,444	40.3	11,209	14.4
Middle-income	211,232	136,347	43.8	64.5	59,122	28	15,763	7.5
Upper-income	155,575	118,019	37.9	75.9	30,122	19.4	7,434	4.8
Unknown-income	924	47	0	5.1	649	70.2	228	24.7
Total Assessment Area	**519,952**	**311,183**	**100.0**	**59.8**	**159,470**	**30.7**	**49,299**	**9.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3,918	8.7	3,345	8.4	547	12	26	5.3
Moderate-income	5,299	11.8	4,591	11.5	664	14.6	44	8.9
Middle-income	17,083	38	15,272	38.3	1,611	35.3	200	40.7
Upper-income	17,201	38.2	15,525	38.9	1,470	32.2	206	41.9
Unknown-income	1,480	3.3	1,193	3	271	5.9	16	3.3
Total Assessment Area	**44,981**	**100.0**	**39,926**	**100.0**	**4,563**	**100.0**	**492**	**100.0**
	Percentage of Total Businesses:			**88.8**		**10.1**		**1.1**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 15380 (BUFFALO-CHEEKTOWAGA-NIAGARA FALLS, NY)

LENDING TEST

M&T's performance under the lending test in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) is based on the following summary. The bank's lending levels reflected good responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

Lending Activity

M&T's lending levels reflected good responsiveness to assessment area credit needs in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY). This conclusion is based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered good while small business lending was excellent. For the five-year evaluation period, lending activity totaled 20,288 loans consisting of 10,047 home purchase, 3,111 refinance, 1,943 home improvement and 5,187 small business loans. Lending activity was stable on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 8,263 loans consisting of 3,716 home purchase, 2,255 refinance, 575 home improvement, and 1,717 small business loans. When annualized, HMDA and small business volume for the evaluation period decreased 1.8% overall compared to the previous evaluation period. By product there was an annualized decrease in refinance lending (-44.8%) and annualized increases in home purchase (8.1%), home improvement (35.2%) and small business (20.8%) lending. Analysis of the aggregate lending for the evaluation period indicated an annualized decrease in lending volume overall.

Over the review period, M&T's market share of deposits increased while lending was generally stable. In 2018, M&T had a deposit market share of 62.8%, and lending market shares of 12.3% in home purchase, 15.2% in refinance lending, 27.3% in home improvement and 7.9% in small business lending. In comparison, at the beginning of the review period in 2014, M&T had a deposit market share of 50.3%, and lending market shares of 15.5% in home purchase, 7.7% in refinance lending, 12.1% in home improvement and 6.8% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area. Lending penetration in LMI tracts was good for home purchase lending, adequate for refinance lending, and excellent for home improvement lending. Small business penetration in LMI census was also excellent.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 represented 95.7% of all census tracts in the assessment area when considering HMDA and small business lending. M&T penetrated 95.7% of low-income census tracts and 94.4% of moderate-income census tracts for HMDA and small business lending. Overall, penetration of different income levels in 2014-2017 for HMDA and small business lending was comparable as the bank penetrated 95.3% of all census tracts in 2017, 95.0% in 2016, 92.6% in 2015 and 94.3% in 2014.

MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	46	2	95.7%
Moderate	54	3	94.4%
Middle	119	0	100.0%
Upper	70	0	100.0%
Unknown	10	8	20.0%
Total Tracts	299	13	95.7%
2017			
Low	46	1	97.8%
Moderate	54	2	96.3%
Middle	119	2	98.3%
Upper	70	1	98.6%
Unknown	10	8	20.0%
Total Tracts	299	14	95.3%
2016			
Low	37	2	94.6%
Moderate	60	4	93.3%
Middle	123	1	99.2%
Upper	71	0	100.0%
Unknown	8	8	0.0%
Total Tracts	299	15	95.0%
2015			
Low	37	5	86.5%
Moderate	60	6	90.0%
Middle	123	3	97.6%

Upper	71	0	100.0%
Unknown	8	8	0.0%
Total Tracts	299	22	92.6%
2014			
Low	37	5	86.5%
Moderate	60	3	95.0%
Middle	123	2	98.4%
Upper	71	0	100.0%
Unknown	8	7	12.5%
Total Tracts	299	17	94.3%

Home Purchase

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area. Performance was good in both low- and moderate-income census tracts. In 2018, the bank made 6.0% by number and 3.4% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was comparable to the 6.9% of owner-occupied housing units located in low-income census tracts. Performance exceeded the aggregate, which made 4.9% by number and 2.8% by dollar in low-income census tracts. In 2018, the bank made 11.0% by number and 7.0% by dollar of home purchase loans in moderate-income census tracts. Home purchase lending in moderate-income census tracts was comparable by number to the 11.4% of owner-occupied housing units located in moderate-income census tracts but below by dollar volume. Performance slightly exceeded the aggregate, which made 10.2% by number and 6.7% by dollar in moderate-income census tracts.

Home purchase performance in 2014-2017 was consistent with 2018's performance. In 2014, 2015 and 2016, home purchase performance was comparable to both the demographic and aggregate. In 2017, home purchase lending in low-income census tracts was comparable to the demographic and exceeded the aggregate. In 2014-2017, the bank's home purchase lending in moderate-income census tracts was generally comparable to the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 3.0% by number and 3.0% by dollar of refinance loans in low-income census tracts. Refinance lending in low-income census tracts was below the 6.9% of owner-occupied housing units located in low-income census tracts. Performance was comparable to the aggregate, which made 3.2% by number and 2.2% by dollar in low-income census tracts. In 2018, the bank made 8.6% by number and 5.4% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts

was below the 11.4% of owner-occupied housing units located in moderate-income census tracts but was comparable to the aggregate, which made 8.3% by number and 5.6% by dollar in moderate-income census tracts.

In 2014-2017, refinance performance was consistent with 2018's performance. In 2014-2017, refinance performance in low-income census tracts was below the demographic and comparable to the aggregate. In moderate-income census tracts, refinance lending for 2014 and 2017 was below the demographic and comparable to the aggregate. Refinance lending in moderate-income census tracts for 2015 and 2016 was below both the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected excellent penetration throughout the assessment area. In 2018, the bank made 5.4% by number and 3.3% by dollar of home improvement loans in low-income census tracts. Home improvement lending in low-income census tracts, by number, was below the 6.9% of owner-occupied housing units located in low-income census tracts but lending exceeded the aggregate, which made 3.9% by number and 2.6% by dollar in low-income census tracts. In 2018, the bank made 9.1% by number and 8.8% by dollar of home improvement loans in moderate-income census tracts. Home improvement lending in moderate-income census tracts, by number, was below the 11.4% of owner-occupied housing units located in moderate-income census tracts but exceeded the aggregate, which made 7.8% by number and 6.4% by dollar in moderate-income census tracts.

The bank's overall home improvement lending in 2014-2017 exceeded 2018 performance. In 2014, 2016 and 2017, the bank's home improvement lending in low-income census tracts exceeded the demographic and the aggregate. In 2015, the bank's home improvement lending in low-income census tracts exceeded the demographic and was comparable to the aggregate. In moderate-income census tracts home improvement performance for 2014-2017 exceeded both the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected excellent penetration. In 2018, the bank made 10.4% by number and 11.0% by dollar of small business loans in low-income census tracts. The bank's small business lending in low-income census tracts, by number, exceeded the demographic of the assessment area where 8.7% of businesses were located. M&T's small business lending performance also exceeded the aggregate, which made 8.8% by number and 11.0% by dollar in low-income census tracts. In 2018, the bank made 13.3% by number and 13.5% by dollar of small business loans in moderate-income census tracts exceeding the demographic figure of 11.8% of businesses located in moderate-income census tracts. M&T's small business lending also exceeded the aggregate, which made 11.1% by number and 14.2% by dollar in moderate-income census tracts.

The bank's small business lending in 2014-2017 was consistent with performance in 2018, exceeding both the demographic and the aggregate in low-and moderate-income census tracts.

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

M&T's distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) assessment area.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers which comprised 14.4% by number and 6.9% by dollar was above aggregate lending data, at 9.8% by number and 5.5% by dollar, while below the demographic figure, at 22.2%. The bank's lending to moderate-income borrowers, at 33.2% by number and 22.5% by dollar, exceeded both the aggregate lending data and at 25.9% by number and 18.9% by dollar and the demographic figure at 16.6%.

M&T's lending to low-income borrowers for 2015-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending but was below the demographic figure. In 2014, the bank's lending to low-income borrowers was more comparable to the aggregate lending data and but still below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was also consistent with 2018 performance. The bank's lending was above both the aggregate lending data and the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 11.1% by number and 6.7% by dollar, was comparable to the aggregate lending data, at 10.6% by number and 6.5% by dollar, while below the demographic figure, at 22.2%. The bank's lending to moderate-income borrowers, at 19.0% by number and 13.8% by dollar, was comparable to both the aggregate lending data, at 20.8% by number and 15.8% by dollar and the demographic figure at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 was below the 2018 lending performance. Lending to low-income borrowers was below aggregate data lending and was significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2015 and 2017 was consistent with the 2018 performance, as lending was consistent with both the aggregate lending data and the demographic figure. In 2014, the bank's lending was below the demographic and the

aggregate, while in 2016, lending was below the demographic but consistent with the aggregate lending data.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 10.2% by number and 6.7% by dollar, was consistent with aggregate lending data, at 9.5% by number and 7.0% by dollar, but was below the demographic figure, at 22.2%. The bank's lending to moderate-income borrowers, at 17.3% by number and 12.7% by dollar, was slightly below the aggregate lending data at 19.0% by number and 15.4% by dollar but was comparable to the demographic figure at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending but was slightly below the demographic figure in each year. The bank's lending to moderate-income borrowers in 2014-2017 also exceeded 2018 performance. The bank's lending in 2014 and 2015 was consistent with the aggregate lending data and above the demographic figure. Lending in 2016-2017 to the moderate-income borrowers was above both the aggregate lending data and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes. In 2018, the bank originated 54.0% of loans by number and 23.7% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data, at 44.0% by number and 29.3% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1MM or less, at 88.8%. While the bank's loan volume was significantly below the demographic figure, the bank originated 64.9% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was below 2018 lending. While all years were significantly below the demographic figure, the bank's lending in 2016 was slightly above the aggregate lending data and 2014, 2015 and 2017 lending to small businesses was comparable to aggregate lending.

Community Development Lending

M&T was a leader in making community development loans in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) with 120 loans totaling $751.3 million. Due to M&T's large deposit market share, when comparing to other institutions, M&T ranked fifth out of seven; however, the dollar volume of lending originated by M&T was significantly more than comparative institutions.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	12	32,352
Community Services	55	149,724
Economic Development	5	6,119
Revitalize and Stabilize	48	563,088
Total	**120**	**751,283**

Community development lending was responsive to identified community needs as lending targeted revitalization and stabilization endeavors, which included the revitalization of distressed neighborhoods through the construction of commercial property which brought jobs for low- and moderate-income individuals. Community development activities also supported economic community service initiatives to low- and moderate-income individuals. M&T's performance is strong considering the high competition for community development loans and the number of large national banks in the area.

Examples of community development initiatives included:

- Seven loans totaling $200.0 million for the expansion of a medical campus development, which revitalized a low-income tract.
- Three lines of credit totaling $75.0 million for business expansion in a low-income tract.
- Four loans totaling $60.0 million to a community foundation that supported programmatic and mission related investments serving predominately low- and moderate-income populations.
- A $13.0 million loan supporting a 215-unit affordable housing development for low- and moderate-income seniors and permanently disabled adults.

INVESTMENT TEST

M&T's performance in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) is based on the following summary. The bank made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, and often in a leadership position. The bank made extensive use of innovative or complex investments to support community development activities and exhibited excellent responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 14 qualified investments totaling $148 million, in the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY). Investments consisted of $142.2 million during the current period and $5.8 million outstanding from the prior period. Due to M&T's large deposit market share, when comparing to other institutions, M&T ranked sixth out of seven; however, the dollar volume of investments conducted by M&T was significantly more than comparative institutions.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) - New	8	88,240	1	9,675	0	0	2	44,329	11	142,244
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)– Prior Period	3	5,839	0	0	0	0	0	0	3	5,839
Total	11	94,079	1	9,675	0	0	2	44,239	14	148,083

The following are examples of qualified investments that met critical needs in the assessment area:

- A $37.1 million investment in a bond supporting a hospital expansion of the Buffalo-Niagara medical campus. Expansion of the campus will help revitalize a low-income tract.
- A $30.2 million investment in LIHTC to renovate a 158-unit housing complex. The housing project has 17 units reserved for tenants with incomes at or below 50% of AMI, 124 units reserved for tenants with incomes at or below 60% of AMI and 17 units for workforce tenants with incomes at or below 80% of AMI.
- Deposits totaling $600,000 in a community development credit union.
- An investment of $8.3 million in LIHTC for the rehabilitation of two separate projects a rural community for seniors. The housing project has 28 units reserved for tenants with incomes at or below 30% of AMI, 49 units reserved for tenants with incomes at or below 50% of AMI, 27 units at 60% of AMI, and 8 units at 90% of AMI.
- A $9.7 million investment that supports the refinance of bonds issued by an Industrial Development Authority (IDA) for improvements to a skilled nursing facility with 272 beds. The majority of patients (53.4%) are funded through Medicaid.

In addition to qualified investments, the bank made 357 grants or donations totaling $4.3 million to various organizations during the evaluation period. The grants and donations were primarily comprised of funds for community services and revitalization and stabilization.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	28	394,000	264	2,348,225	24	475,200	41	1,127,200	357	4,344,625

SERVICE TEST

M&T was a leader in providing community development services in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY). Delivery systems in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY) were readily accessible to the bank's geographies and individuals of different income levels in the bank's assessment area, and changes in branch locations did not adversely affect accessibility of its delivery systems particularly in LMI geographies and to LMI individuals. Services did not vary in a way that inconvenienced its assessment area particularly in LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in the assessment area. M&T operated 50 branches in the MSA 15380 (Buffalo-Cheektowaga-Niagara Falls) assessment area, of which nine (18.0%) were located in low-income areas and five (10.0%) were located in moderate-income areas. This compares favorably to the 12.7% and 13.4% of the assessment area's population that resided in low- and moderate-income areas, respectively.

Alternative delivery systems did not enhance the bank's performance in the assessment area. M&T had 83 off-site ATM locations in the MSA, three (3.6%) of which were in low-income tracts, and two (2.4%) were in moderate-income tracts.

Changes in branch locations did not adversely impact the accessibility of the bank's delivery systems. M&T closed one branch in MSA 15380, which was in a middle-income tract.

The bank's hours and services did not vary in a way that inconvenienced the needs of the assessment area, particularly LMI geographies and/or LMI individuals. Of the 50 branches in the MSA, 24 or 48.0% had late evening hours and 11 branches or 22.0% had Saturday hours. Of the

14 branches in LMI census tracts, two or 14.3% had extended hours and three or 21.4% had Saturday hours.

Community Development Services

The bank was a leader in providing community development services in MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY). The table shows the number and type of services provided during the evaluation period. The bank's management and staff served on the board of directors for 471 nonprofit and community-based organizations in this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Financial Education	1,857
Technical Assistance	34
Small Business Seminars	168
Board Participation	471
Total	**2,530**

METROPOLITAN AREA

(FULL REVIEW)

MSA 40380 (ROCHESTER, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 40380 (ROCHESTER, NY)

MSA 40380 (Rochester, NY) assessment area contained the second largest population of M&T's branches, loans, and deposits in New York State and included the City of Rochester. As of December 31, 2018, M&T operated 27 branches in the MSA, representing 15.4% of the bank's branches in New York. Based on the FDIC Deposit Market Share Report, M&T held $3.9 billion or 10.0% of the total New York State deposit base in MSA 40380 (Rochester, NY), as of June 30, 2018. Of the bank's total HMDA-related and small business originations made in the New York State assessment areas, this assessment area represented 18.2% of the lending in this MSA.

MSA 40380 (Rochester, NY) was dominated by a few regional banks competing with M&T for retail lending and deposit activity. M&T captured a deposit market share of 20.9%, ranking 1st in deposits among the 20 depository institutions operating in this assessment area. Other financial institutions with a significant deposit market share included JP Morgan Chase Bank N.A., KeyBank N.A., Bank of America N.A., Canandaigua National Bank and Trust Company, RBS Citizens Bank N.A., and Five Star Bank.

Community Contacts

To learn more about community credit needs, examiners conducted interviews and received comments from three nonprofit agencies that were actively involved with affordable housing and economic development activity.

Within the City of Rochester, a community contact was conducted with an organization that monitors lending patterns in Rochester and has met with numerous banks and state and federal regulators. The contact indicated that traditionally underserved families and communities benefit more when they obtain mortgages from lenders with a local depository presence than from lesser-regulated mortgage companies or lenders with no local CRA obligations. The contact noted there are benefits to both the borrower and the bank when borrowers develop additional financial relationships with their mortgage lender. The contact expressed concern that bank data showed a decline in home purchase loan originations in the assessment area since 2014. The organization also identified several parts of Rochester with a lack of bank branches and a need for banking services.

A second contact was conducted with a non-profit organization that was involved with real estate development, HUD Section 8 programs, and employment and workforce development. Additionally, the organization provides Headstart programs and other direct services. The contact indicated that New York faces challenges of housing affordability. The contact noted there is a need for moratorium on evictions, which are an anticipated problem coming at the end of the COVID-19 pandemic. The contact also noted that many cities such as Rochester have transportation issues due to jobs located in suburban areas, with very limited public transportation.

A third contact was conducted with a non-profit lender that develops affordable housing in the City of Rochester. The organization offers training programs, such as foreclosure prevention and counseling programs. The contact stated that the city has several needs, including better schools, job development, improvements to housing quality, and revitalization of the inner city.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe the assessment area and to evaluate the context in which M&T operated. Information was obtained from publicly available sources, including the 2010 Census, 2015 ACS, FFIEC, D&B, the New York State Department of Labor, and HUD.

Demographic Characteristics

The MSA 40380 (Rochester, NY) assessment area included Livingston, Monroe, Ontario, Orleans, and Wayne Counties. According to the 2015 ACS, the population of the assessment area was approximately 1.1 million, with 70.8% residing in Monroe County, which included the City of Rochester. The other four counties were predominately rural and suburban and were much less densely populated. Monroe County's population density was approximately seven times higher than the rest of the metropolitan area. The assessment area consisted of 267 census tracts, of which 44 or 16.5% were low-income, 44 or 16.5% were moderate-income, 109 or 40.8% were middle-income, 61 or 22.8 were upper-income, and nine or 3.4% were unknown-income.

Income Characteristics

MSA 40380 (Rochester, NY) has 262,179 families, of which 21.9% are considered low-income, 17.1% are moderate-income, and 10.4% have incomes below the poverty level. According to FFIEC data, the median family income for the assessment area was consistently below the State of New York. Of the counties that comprise the assessment area, Ontario County had the highest median family income and exceeded the State of New York's median family income based on 2010 data and was comparable to the state according to the 2015 data. Orleans County had the lowest median family income according to 2010 and 2015 data.

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$64,256	$67,607
Livingston County	$63,539	$67,532
Monroe County	$65,240	$69,363
Ontario County	$69,877	$71,483
Orleans County	$58,535	$55,530
Wayne County	$60,324	$61,933
State of New York	$67,405	$71,913

Housing Characteristics

According to the 2015 ACS, MSA 40380 (Rochester, NY) ha 459,864 housing units, of which 61.4% are owner-occupied and 30.0% are rental units. Of the available owner-occupied units, 15.0% are in low- and moderate-income geographies. Over three-quarters of the housing units in the low-income census tracts are either rental or vacant (78.3%), and 21.6% are owner-occupied. In the moderate-income census tracts, over half (53.9% of the housing units are either rental or vacant, and 46.1% are owner-occupied.

The 2015 ACS showed that the median age of housing stock in the assessment area was 57 years old, with 33.8% of the stock built before 1950. In low- and moderate-income census tracts, the median age of housing stock was 61 years, which indicated a potential opportunity to make home improvement loans.

According to the 2015 ACS, the median housing value in the assessment area was $133,674, with an affordability ratio of 39.3. The median housing values increased in all five counties between 2010 and 2015 and household incomes also increased; however, housing only became slightly more affordable in Monroe and Wayne Counties. During the review period, the most affordable housing was in Orleans County, which had an affordability ratio of 50.8. The table below presents housing characteristics from the U.S. Census and ACS between 2010 and 2015 in the assessment area and the State of New York.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$124,262	41.7	$133,674	39.3	$740	$808	9.2%
Livingston County	$112,300	46.0	$121,200	42.7	$664	$721	8.6%
Monroe County	$130,400	39.3	$138,600	37.9	$757	$826	9.1%
Ontario County	$129,600	43.6	$145,700	39.4	$711	$809	13.8%
Orleans County	$86,400	55.6	$91,300	50.8	$630	$639	1.4%
Wayne County	$107,400	48.9	$112,900	45.0	$657	$694	5.6%
State of New York	$303,900	18.3	$283,400	20.9	$977	$1,132	15.90%

Labor, Employment and Economic Characteristics

According to the New York State Department of Labor, key industries in the MSA 40380 (Rochester, NY) had been photographic equipment and related manufacturing, which resulted in a well-educated, high-tech workforce. Currently, education and healthcare are the dominant industries, with the University of Rochester as the largest employer, accounting for over 29,000 jobs. Rochester Regional Health and Wegmans Food Markets Inc. are the second and third leading employers in the assessment area. Despite the challenges, unemployment rates for the assessment area trended downward over the review period, consistent with the nationwide average. The assessment area has 40,964 business establishments in the assessment area, 89.2% of which had gross annual revenues of $1 million or less.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 40380 (Rochester, NY)	5.8	5.1	4.7	4.9	4.2
Livingston	5.8	5.3	4.9	5.0	4.3
Monroe	5.8	5.1	4.7	4.9	4.3
Ontario	5.2	4.7	4.3	4.5	3.9
Orleans	7.7	6.4	5.7	5.9	4.9
Wayne	6.2	5.3	5.0	5.0	4.1
State of New York	6.9	6.3	5.8	5.7	4.2

Additional performance context data for the assessment area is provided in the subsequent MSA 40380 (Rochester, NY) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: MSA 40380 (Rochester, NY) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	44	16.5	20,378	7.8	8,945	43.9	57,294	21.9
Moderate-income	44	16.5	34,370	13.1	6,724	19.6	44,806	17.1
Middle-income	109	40.8	126,957	48.4	9,256	7.3	52,165	19.9
Upper-income	61	22.8	80,369	30.7	2,224	2.8	107,914	41.2
Unknown-income	9	3.4	105	0	4	3.8	0	0
Total Assessment Area	**267**	**100.0**	**262,179**	**100.0**	**27,153**	**10.4**	**262,179**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	44,930	9,726	3.4	21.6	27,773	61.8	7,431	16.5
Moderate-income	71,159	32,781	11.6	46.1	30,673	43.1	7,705	10.8
Middle-income	219,410	146,765	51.9	66.9	53,806	24.5	18,839	8.6
Upper-income	124,078	93,238	33	75.1	25,715	20.7	5,125	4.1
Unknown-income	287	68	0	23.7	189	65.9	30	10.5
Total Assessment Area	**459,864**	**282,578**	**100.0**	**61.4**	**138,156**	**30.0**	**39,130**	**8.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3,629	8.9	3,056	8.4	551	13.8	22	5.2
Moderate-income	5,592	13.7	4,883	13.4	650	16.3	59	13.8
Middle-income	18,353	44.8	16,406	44.9	1,708	42.9	239	56
Upper-income	13,322	32.5	12,167	33.3	1,048	26.3	107	25.1
Unknown-income	68	0.2	44	0.1	24	0.6	0	0
Total Assessment Area	**40,964**	**100.0**	**36,556**	**100.0**	**3,981**	**100.0**	**427**	**100.0**
	Percentage of Total Businesses:			**89.2**		**9.7**		**1.0**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 40380 (ROCHESTER, NY)

LENDING TEST

M&T's performance in MSA 40380 (Rochester, NY) is based on the following summary. M&T's lending levels reflected good responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

For the analysis of geographic distribution and borrower distribution greater weight was given to the analysis of HMDA lending based on the loan volumes.

Lending Activity

M&T's lending levels reflected good responsiveness to assessment area credit needs in MSA 40380 (Rochester, NY). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA was considered adequate and small business-related lending was considered good. For the five-year evaluation period, lending activity totaled 9,921 loans consisting of 3,973 home purchase, 998 refinance, 749 home improvement and 4,201 small business loans. Lending activity declined on an annualized basis compared to the prior two-year period, during which lending activity totaled 4,391 loans consisting of 1,847 home purchase, 880 refinance, 283 home improvement, and 1,381 small business loans. HMDA volume for the evaluation period declined 9.7% overall compared to the previous evaluation period. This annualized decrease was driven by annualized decreases in home purchase (-14.0%) and refinance (-54.6%) lending. Annualized increases occurred in home improvement (5.9%) and small business (21.7%) lending volumes. Aggregate lending volume indicated an overall decrease in lending volume over the evaluation period.

M&T's market share of deposits in the assessment area declined while lending market share was dependent upon product. In 2018, M&T had a deposit market share of 20.9%, and lending market shares of 3.7% in home purchase lending, 5.6% in refinance, 11.1% in home improvement and 5.0% in small business lending. In comparison, the deposit market share in 2014 was 24.4%, and lending market share of 6.5% in home purchase lending, 2.6% in refinance lending, 4.1% in home improvement lending, and 6.0% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration in the MSA 40380 (Rochester, NY) assessment area. Lending penetration in LMI tracts was excellent for home purchase loans, adequate for refinance lending, and good for home improvement lending and small business lending.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 87.3% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 65.9% of low-income census tracts and 88.6% of moderate-income census tracts. Overall, penetration of different income levels in 2014-2017 for HMDA and small business lending was similar as the bank penetrated 86.1% of all census tracts in 2017, 90.3% in 2016, 88.8% in 2015 and 90.3% in 2014.

MSA 40380 (Rochester, NY)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	44	15	65.9%
Moderate	44	5	88.6%
Middle	109	6	94.5%
Upper	61	0	100.0%
Unknown	9	8	11.1%
Total Tracts	267	34	87.3%
2017			
Low	44	15	65.9%
Moderate	44	8	81.8%
Middle	109	6	94.5%
Upper	61	1	98.4%
Unknown	9	7	22.2%
Total Tracts	267	37	86.1%
2016			
Low	41	14	65.9%
Moderate	41	3	92.7%
Middle	121	2	98.3%
Upper	57	1	98.2%
Unknown	7	6	14.3%
Total Tracts	267	26	90.3%
2015			
Low	41	12	70.7%
Moderate	41	6	85.4%
Middle	121	5	95.9%
Upper	57	2	96.5%
Unknown	7	5	28.6%
Total Tracts	267	30	88.8%
2014			
Low	41	13	68.3%
Moderate	41	3	92.7%
Middle	121	3	97.5%

Upper	57	1	98.2%
Unknown	7	6	14.3%
Total Tracts	267	26	90.3%

Home Purchase

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area in 2018. In 2018, the bank made 5.3% by number and 5.2% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts exceeded the 3.4% of owner-occupied housing units located in low-income census tracts and the aggregate, which made 2.5% by number and 1.4% by dollar in low-income census tracts. In 2018, the bank made 20.4% by number and 11.7% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts exceeded the 11.6% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate, which made 11.2% by number and 7.1% by dollar volume in moderate-income census tracts.

M&T's performance in 2014-2017 was consistent with 2018 performance in both low- and moderate-income census tracts. In 2014, 2016 and 2017, the bank's home purchase lending in low-income census tracts exceeded the demographic and the aggregate. In 2015, the bank's home purchase lending in low-income census tracts was below the demographic and comparable to the aggregate. In moderate-income census tracts for 2014-2017, the bank's home purchase lending exceeded the demographic and the aggregate.

Refinance

Overall, the geographic distribution of refinance loans reflected poor penetration throughout the assessment area. In 2018, the bank made 1.9% by number and 0.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was below the 3.4% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.7% by number and 2.1% by dollar in low-income census tracts. In moderate-income census tracts the bank made 7.1% by number and 2.9% by dollar of refinance loans in moderate-income census tracts. The bank's performance was below the 11.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 9.3% by number and 7.0% by dollar volume in moderate-income census tracts.

The bank's refinance lending performance for 2014-2017 was below 2018 performance in low-income census tracts as performance was below both the aggregate lending data and the demographic figure. The bank's refinance lending performance for 2014, 2015 and 2017 was consistent with for 2018 performance in moderate-income census tracts, while performance in

2016 was below 2018 performance as refinance lending in moderate-income census tracts was significantly below both the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, M&T made 3.0% by number and 1.3% by dollar of home improvement loans in low-income census tracts. Home improvement lending in low-income census tracts was below the 3.4% of owner-occupied housing units located in low-income census tracts but was comparable to the aggregate, which made 2.6% by number and 1.5% by dollar in low-income census tracts. In 2018, the bank made 5.2% by number and 2.5% by dollar of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts was below the 11.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 9.7% by number and 7.0% by dollar in moderate-income census tracts.

In 2014-2017, M&T's home improvement lending performance exceeded 2018 performance in both low- and moderate-income census tracts. In 2014, 2016 and 2017, the bank's home improvement lending in low-income census tracts exceeded the demographic and the aggregate. In 2015, the bank's home improvement lending in low-income census tracts exceeded the demographic and was comparable to the aggregate. In moderate-income census tracts for 2014, 2015 and 2016 home improvement lending exceeded the demographic and the aggregate. In 2017, home improvement lending was below the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration. In 2018, the bank made 9.2% by number and 10.1% by dollar of small business loans in low-income census tracts, exceeding the demographic of the assessment area where 8.9% of businesses were located in low-income tracts. M&T's small business lending also exceeded the aggregate, which made 7.5% by number and 8.3% by dollar in low-income census tracts. In 2018, the bank made 9.2% by number and 10.1% by dollar of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income census tracts was below the demographic of the assessment area, where 13.7% of businesses were located in moderate-income census tracts. The bank's lending was also below the aggregate, which made 12.4% by number and 10.9% by dollar in moderate-income census tracts.

In 2014-2017, the bank's small business lending in low-income census tracts was consistent with 2018 performance in each year as it was above both the demographic figure and aggregate performance. Performance in moderate-income census tracts for 2014-2017 was also consistent with 2018 performance, as performance in 2014 and 2017 small business was below the demographic and the aggregate. In 2015 and 2016, small business performance was below the demographic and comparable to the aggregate.

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

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in the MSA 40380 (Rochester, NY) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of $1 million or less was adequate. Greater weight was given to the analysis of HMDA lending based on the loan volumes.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, excellent penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers, which comprised 19.4% by number and 10.9% by dollar, was above the aggregate lending data, at 9.2% by number and 4.9% by dollar, while comparable to the demographic figure, at 21.9%. The bank's lending to moderate-income borrowers, at 45.4 % by number and 33.0% by dollar, significantly exceeded both the aggregate lending data, at 24.6% by number and 18.0% by dollar, and the demographic figure, at 17.1%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers was above the aggregate data lending but was below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was also consistent with 2018 performance. The bank's lending was above the aggregate lending data and significantly above the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 14.0% by number and 6.3% by dollar, was slightly above the aggregate lending data, at 10.2% by number and 6.1% by dollar, while the bank's lending was below the demographic figure, at 21.9%. The bank's lending to moderate-income borrowers, at 22.2% by number and 11.4% by dollar, was comparable to the aggregate lending data, at 21.6% by number and 16.0% by dollar, and was slightly above the demographic figure, at 17.1%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. Lending in 2017 was consistent with 2018 lending, as performance was above the aggregate lending data, and below the demographic figure. However, 2014 and 2016 lending to low-income borrowers was below the aggregate data lending, and significantly below the demographic figure, while lending in 2015 was comparable to the aggregate lending data and significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the bank's 2018 performance, as the bank's lending was consistent with the aggregate lending data, and slightly above the demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 9.9 % by number and 6.6% by dollar, was comparable with aggregate lending data, at 7.7% by number and 6.1% by dollar, while it fell significantly below the demographic figure, at 21.9%. The bank's lending to moderate-income borrowers, at 26.7% by number and 19.9% by dollar, was above both the aggregate lending data, at 19.7% by number and 15.2% by dollar and the demographic figure, at 17.1%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending and was more comparable to the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending was above both the aggregate lending data, and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, adequate penetration among businesses of different sizes. In 2018, the bank originated 52.4% or loans by number and 25.3% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data by number, at 44.6% and was comparable by dollar at 29.5%. Performance was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 89.2%. While the bank's loan volume was significantly below the demographic figure, the bank originated 62.8% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was slightly below 2018 lending. Lending to small businesses in 2017, 2015, and 2014 was consistent with aggregate lending but significantly fell below the demographic figure. Lending in 2016 to small businesses was above the aggregate lending data, but also fell significantly below the demographic figure. In addition, in all four years, the bank originated less than 50.0% of their loans to businesses in increments of $100,000 or less.

Community Development Lending

M&T was a leader in making community development loans in MSA 40380 (Rochester, NY) with 74 loan originations totaling, $277.5 million. M&T ranked 2nd of six similarly-situated large retail banks in the assessment area.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	18	109,035
Community Services	38	76,057
Economic Development	6	7,250
Revitalize and Stabilize	12	85,173
Total	**74**	**$277,515**

Performance within MSA 40380 (Rochester, NY) was directed at affordable housing and revitalization and stabilization initiatives, which represented 39.3% and 30.7% by dollar volume of community development lending in the assessment area, respectively.

Examples of community development initiatives included:

- Two renewals of a $16.0 million line of credit to an organization that develops, manages, constructs, and owns affordable multi-family housing communities. The organization was also a frequent user of LIHTC to help fund affordable housing developments.
- A $17.3 million permanent mortgage to buy-out the primary investor of a 525-unit affordable housing property. The property adhered to LIHTC incomes and rent restrictions from a HUD project-based Section 8 contract.
- A $36.5 million construction to permanent mortgage for a revitalization project in downtown Rochester in a low-income tract that includes three floors of commercial space and 14 floors of residential rental units.
- Two loans totaling $26.1 million that supported a revitalization project of a brownfield site in a low-income tract to create a 72-unit apartment complex.

INVESTMENT TEST

M&T's performance in MSA 40380 (Rochester, NY) is based on the following summary. The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, and occasionally in a leadership position. The bank made significant use of innovative or complex investments to support community development activities and exhibited good responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 24 qualified investments totaling $129 million, in the MSA 40380 (Rochester, NY). Investments consisted of $119.5 million during the current period and $9.4 million outstanding from the prior period. When compared to six similarly-situated institutions, M&T ranked second.

Qualified Community Development Investments by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 40380 (Rochester, NY)- New	5	48,826	1	5,725	0	0	2	65,000	8	119,551
MSA 40380 (Rochester, NY)– Prior Period	16	9,491	0	0	0	0	0	0	16	9,491
Total	21	58,317	1	5,725	0	0	2	65,000	24	129,042

The following are examples of qualified investments:

- An investment of $5.7 million in municipal bonds to renovate a nursing home in a low-income census tract with 74% of patients receiving funding through Medicaid.

- An investment of $9.2 million in LIHTC to support construction of 114-units of affordable housing for tenants earning under 60% of AMI.

- A $3.8 million investment in LIHTC for renovations to an existing affordable housing development of 63 units. The units are reserved for individuals with incomes at or below 50% of AMI.

In addition to qualified investments, the bank made grants or donations totaling $2.3 million to organizations in the assessment area during the evaluation period. The majority of grants and donations were comprised of funds for community service activity.

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 40380 (Rochester, NY MSA)	17	41,500	265	2,220,525	2	30,000	1	1,000	285	2,293,075

SERVICE TEST

M&T's was a leader in providing community development services in the MSA 40380 (Rochester, NY), delivery systems that were reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations that did not adversely affect accessibility of its delivery systems particularly to LMI geographies and/or individuals, and

services did not vary in a way that inconvenienced its assessment area particularly LMI geographies and/or individuals.

Retail Services

M&T's delivery systems were reasonably accessible to geographies and individuals of different income levels in the assessment area. M&T operated 27 branches in MSA 40380 (Rochester, NY), of which two (7.4%) were in low-income areas and two (7.4%) were in moderate-income areas. This compares reasonably to the 9.2% and 14.4% of the MSA's population that resides in low- and moderate-income areas, respectively.

Alternative delivery systems enhanced the bank's performance in the assessment area. M&T had 19 off-site ATM locations in the MSA; one (5.2%) of which was in a low-income census tract and four (21.0%) were in moderate-income census tracts.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. M&T closed two branches in MSA 40380, which were in middle and upper-income census tracts.

The bank's hours and services did not vary in a way that inconvenienced the needs of the assessment area, particularly LMI geographies and/or LMI individuals. Of the 27 branches in the MSA, 24 or 88.8% had extended hours and 22 branches or 81.4% had Saturday hours. Of the four branches in LMI census tracts, three branches or 75% had extended hours and two branches or 50% had Saturday hours.

Community Development Services

M&T was a leader in providing community development services in MSA 40380 (Rochester, NY). The table shows the number and type of services the bank performed during the evaluation period. Financial education covered mortgage lending topics for LMI borrowers. In addition, management and staff served on the board of directors for 131 nonprofit and community-based development services in MSA 40380 (Rochester, NY).

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Financial Education	1,005
Technical Assistance	3
Small Business Seminars	29
Board Participation	131
Total	**1,168**

METROPOLITAN AREA

(FULL REVIEW)

MSA 45060 (SYRACUSE, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS MSA 45060 (SYRACUSE, NY)

As of December 31, 2018, M&T operated 28 branches in MSA 45060 (Syracuse, NY), representing 16.0% of the bank's branches in New York. Based on the FDIC Deposit Market Share Report, M&T held $3.1 billion or 7.8% of its total deposit base in the MSA as of June 30, 2018. M&T captured a deposit market share of 24.6%, ranking 1st in deposits among the 16 depository institutions operating in this assessment area. Other financial institutions with a significant deposit market share included KeyBank N.A., JP Morgan Chase, NBT Bank, N.A. Community Bank N.A., and Bank of America, N.A. Of the bank's total HMDA-related and small business originations in the New York State assessment areas, M&T conducted 10.0% of its lending in this assessment area.

Community Contacts

In order to learn more about community credit needs, examiners conducted an interview with a nonprofit agency that was involved with affordable housing.

A community contact was conducted with an organization that created housing opportunities for individuals and families in central New York. Its mission was to improve the quality of local housing and neighborhoods by providing sustainable home ownership and affordable home improvements for people in central New York. It offers a range of services and products, which include homebuyer education, financial counseling, housing repair and rehabilitation programs, innovative loan products and financing assistance, and post purchase counseling to home buyers. The contact indicated there is a need for home improvement loans in the assessment area. In addition, the contact noted that there is a challenge for new home-owners to obtain home improvement loans because the owner's home equity decreased substantially due to falling house market prices at the time of the discussion. According to the contact, there are opportunities for banks to provide home improvement grants to LMI homeowners and community development loans and investments to local CDFIs. In addition, the contact noted that there is a need for capital for small real estate investors to fund home renovations. The contact also stated that the local, regional, and national banks are doing a satisfactory job in providing credit needs and services in the community.

PERFORMANCE CONTEXT

M&T's assessment area in MSA 45060 (Syracuse, NY) included Onondaga and Madison Counties and excluded Oswego County. According to the 2015 ACS, the population of the assessment area was approximately 540,731, with most of the population residing in the City of Syracuse and the surrounding county of Onondaga. The remaining areas were predominately suburban and rural and much less densely populated.

Of the 156 census tracts in the assessment area, 23 or 14.7%, were low-income, 24 or 15.4% were moderate-income, 58 or 37.2% were middle-income, 46 or 29.5% were upper-income and 5 or 3.2% were of unknown income.

Income Characteristics

There were 129,938 families residing in the MSA, of which 20.7% were considered low-income, 16.6% were moderate-income, and 10.2% lived below the poverty level. According to the 2010 Census and the 2015 ACS, the median family income for MSA 45060 (Syracuse, NY) was $64,952 in 2010 and $70,508 in 2018.

Median Family Income		
County	**2010**	**2015**
Assessment Area	$64,952	$70,508
Madison	$61,828	$67,122
Onondaga	$65,929	$71,545
State of New York	$67,405	$71,913

Housing Characteristics

In 2018, MSA 45060 (Syracuse, NY) had 235,698 housing units, of which 59.5% were owner-occupied and 30.0% were rental units. Of the available owner-occupied units, 13.5% were in LMI areas. In low-income census tracts, 61.3% of the housing units were rental units, 21.2% vacant, and 17.5% were owner-occupied. In moderate-income census tracts, 58.8% of the housing units were either rental or vacant, and 41.2% were owner-occupied.

In 2018, the median age of housing stock in the assessment area was 59 years old, with 32.3% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible opportunity for home improvement loans. The median housing value in the assessment area was $134,626, with an affordability ratio of 40.7. The median gross rent in the assessment area was $780 per month. Within the assessment area, 46.2% of all renters had rental costs that exceeded 30% of their incomes. The table below presents housing characteristics from the U.S. Census and ACS between 2010 and 2015 in the assessment area and the State of New York.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$122,735	41.4	$134,626	40.7	$707	$780	10.3%
Madison	$111,700	30.2	$124,900	43.4	$691	$718	3.9%
Onondaga	$124,400	47.6	$135,900	40.5	$708	$787	11.2%
State of New York	$303,900	18.3	$283,400	20.9	$977	$1,132	15.9%

Labor, Employment and Economic Characteristics

Onondaga County's major employment industries were healthcare, education, and retail. Manufacturing was once a robust industry in Onondaga County, but over the past decade, the number of manufacturing jobs and companies in the area has steadily declined. Among the companies that have ceased operations were Carrier Corporation, General Electric, General Motors, and Allied Chemical in Solvay. According to D&B data, the assessment area had a total of 21,213 businesses in 2018, of which 18,757 (88.4%) were small businesses with GAR of $1 million or less.

Unemployment in the assessment area significantly decreased over the review period with unemployment percentages falling significantly in 2015 and 2018.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 45060 (Syracuse, NY)	6.1	5.4	4.9	5.1	4.3
Madison County	6.4	5.7	5.3	5.5	4.8
Onondaga County	6.2	5.2	4.7	4.6	4.3
State of New York	6.9	6.3	5.8	5.7	4.2

Additional performance context data for this assessment area is provided in the subsequent MSA 45060 (Syracuse, NY) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: MSA 45060 (Syracuse, NY) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	23	14.7	11,100	8.5	4,628	41.7	26,929	20.7
Moderate-income	24	15.4	15,519	11.9	2,767	17.8	21,560	16.6
Middle-income	58	37.2	55,916	43	3,735	6.7	26,240	20.2
Upper-income	46	29.5	46,921	36.1	1,911	4.1	55,209	42.5
Unknown-income	5	3.2	482	0.4	178	36.9	0	0
Total Assessment Area	**156**	**100.0**	**129,938**	**100.0**	**13,219**	**10.2**	**129,938**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,960	4,549	3.2	17.5	15,910	61.3	5,501	21.2
Moderate-income	35,091	14,444	10.3	41.2	16,089	45.8	4,558	13
Middle-income	98,271	66,418	47.3	67.6	22,885	23.3	8,968	9.1
Upper-income	73,688	54,664	39	74.2	13,499	18.3	5,525	7.5
Unknown-income	2,688	209	0.1	7.8	2,262	84.2	217	8.1
Total Assessment Area	**235,698**	**140,284**	**100.0**	**59.5**	**70,645**	**30.0**	**24,769**	**10.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,031	9.6	1,706	9.1	298	13.5	27	10.6
Moderate-income	2,180	10.3	1,905	10.2	246	11.2	29	11.4
Middle-income	8,299	39.1	7,230	38.5	971	44.1	98	38.4
Upper-income	8,163	38.5	7,492	39.9	575	26.1	96	37.6
Unknown-income	540	2.5	424	2.3	111	5	5	2
Total Assessment Area	**21,213**	**100.0**	**18,757**	**100.0**	**2,201**	**100.0**	**255**	**100.0**
	Percentage of Total Businesses:			**88.4**		**10.4**		**1.2**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 45060 (SYRACUSE, NY)

LENDING TEST

M&T's performance in MSA 45060 (Syracuse, NY) is based on the following summary. M&T's lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making CD loans.

Lending Activity

M&T's lending levels reflected good responsiveness to assessment area credit needs in MSA 45060 (Syracuse, NY). This conclusion is based on lending activity levels, market share

performance and comparison with market aggregate data. Performance in HMDA-related lending was considered adequate while small business lending was good. For the five-year evaluation period, lending activity totaled 5,224 loans consisting of 1,443 home purchase, 783 refinance, 551 home improvement and 2,447 small business loans. Lending activity declined compared to the prior two-year period, during which lending activity totaled 2,486 loans consisting of 754 home purchase, 661 refinance, 238 home improvement, and 833 small business loans. Overall, HMDA and small business volume for the evaluation period decreased 15.9% on an annualized basis compared to the previous evaluation period. This decrease was driven primarily by annualized decreases in home purchase (-23.4%), refinance (-52.6%) and home improvement (-7.4) lending. Annualized increases occurred in small business (17.5%) loan volumes. Analysis of aggregate lending for the evaluation period indicated an annualized decrease in lending volume for the aggregate overall.

M&T's market share of deposits was stable while lending market share in the assessment area increased. In 2018, M&T had a deposit market share of 24.6%, and lending market shares of 2.3% in home purchase lending, 9.4% in refinance, 12.1% in home improvement and 6.3% in small business lending. In comparison, the deposit market share in 2014 was 23.7%, with a lending market share of 5.3% in home purchase lending, 3.6% in refinance lending, 6.6% in home improvement lending, and 6.0% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans in the MSA 45060 (Syracuse, NY) assessment area reflected good penetration. Lending penetration in LMI tracts was good for home purchase, home improvement loans, and small business loans, and adequate for refinance loans.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 87.2% of all census tracts in the assessment area when considering HMDA and small business lending. Penetration in low-income census tracts in 2018 was 69.6% and penetration of moderate-income tracts was 70.8% when considering HMDA and small business lending. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending was slightly higher as the bank penetrated 91.0% of all census tracts in 2017, 92.3% in 2016, 93.6% in 2015 and 93.6% in 2014.

MSA 45060 (Syracuse, NY)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	23	7	69.6%

Moderate	24	7	70.8%
Middle	58	2	96.6%
Upper	46	1	97.8%
Unknown	5	3	40.0%
Total Tracts	156	20	87.2%
2017			
Low	23	6	73.9%
Moderate	24	3	87.5%
Middle	58	1	98.3%
Upper	46	2	95.7%
Unknown	5	2	60.0%
Total Tracts	156	14	91.0%
2016			
Low	25	9	64.0%
Moderate	28	3	89.3%
Middle	53	0	100.0%
Upper	49	0	100.0%
Unknown	1	0	100.0%
Total Tracts	156	12	92.3%
2015			
Low	25	6	76.0%
Moderate	28	3	89.3%
Middle	53	0	100.0%
Upper	49	0	100.0%
Unknown	1	1	0.0%
Total Tracts	156	10	93.6%
2014			
Low	25	3	88.0%
Moderate	28	3	89.3%
Middle	53	1	98.1%
Upper	49	2	95.9%
Unknown	1	1	0.0%
Total Tracts	156	10	93.6%

Home Purchase

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area. In 2018, the bank made 1.2% by number and 0.8% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts, by number, was below the 3.2% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 2.5% by number and 1.3% by dollar in low-income census tracts. In 2018, the bank made 10.6% by number and 5.8% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts, exceeded the 10.3% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate, which made 9.7% by number in moderate-income tracts. M&T's home purchase lending in moderate-income tracts by dollar was below the aggregate, which made 6.3% by dollar amount volume in moderate-income census tracts.

In 2014-2017, the bank's home purchase lending in low-income census tracts was consistent with the performance in 2018 as performance exceeded both the demographic and the aggregate in 2014 and 2017. In 2015 and 2016, home purchase lending in low-income census tracts was consistent with 2018 as performance was below the demographic and the aggregate. In 2016, the bank's home purchase lending in low-income census tracts was below the demographic and exceeded the aggregate. In 2014, 2015 and 2017, the bank's home purchase lending in moderate-income census tracts generally exceeded the demographic and was comparable to the aggregate. In 2016, performance exceeded the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 1.8% by number and 0.8% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was below the 3.2% of owner-occupied housing units located in low-income census tracts but was comparable to the aggregate, which made 1.6% by number and 1.0% by dollar in low-income census tracts. Refinance performance in 2018 in moderate-income census tracts was below both the 10.3% of owner-occupied housing units located in moderate-income census tracts and the aggregate, which made 9.7% by number and 7.0% by dollar in moderate-income census tracts, as the bank made 2.5% by number and 1.8% by dollar of refinance loans in moderate-income census tracts.

Refinance lending performance in 2014-2017 was below 2018 performance. In low-income tracts in 2014, 2015 and 2017, the bank's refinance lending was below the demographic and the aggregate. In 2016, the bank's refinance lending in low-income census tracts was below the demographic but exceeded the aggregate. In moderate-income census tracts, the bank's refinance lending for 2014, 2015 and 2016 was below the demographic and comparable to the aggregate. In

2017, the bank's refinance lending in moderate-income census tracts was below the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 0.7% by number and 0.6% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending in low-income census tracts, by number, was below the 3.2% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 1.5% by number and 1.2% by dollar in low-income census tracts. In 2018, the bank made 0.7% by number and 0.1% by dollar of home improvement loans in moderate-income census tracts. The bank's performance was below the 10.3% of owner-occupied housing units located in moderate-income census tracts and the aggregate, which made 6.7% by number and 4.1% by dollar in moderate-income census tracts.

M&T's performance in 2014-2017 was comparable 2018's performance. In 2014, the bank's home improvement lending in low-income census tracts was comparable to the demographic and the aggregate. In 2015, the bank's home improvement lending in low-income census tracts exceeded the demographic and the aggregate. In 2016 and 2017, the bank's home improvement lending in low-income tracts was below the demographic and the aggregate. In moderate-income census tracts in 2014, 2015, and 2016, the bank's home improvement lending exceeded the demographic and the aggregate. In 2017, performance was below the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018, the bank made 8.0% by number and 9.2% by dollar of small business loans in low-income census tracts. Small business lending in low-income census tracts was below the demographic of the assessment area where 9.6% of businesses were located but the bank's lending exceeded the aggregate by number, which made 7.7% by number in low-income census tracts and was comparable to the aggregate's 9.5% by dollar. In 2018, the bank made 7.5% by number and 10.8% by dollar of small business loans in moderate-income census tracts. The bank's small business lending, by number, was below the demographic of the assessment area where 10.3% of businesses were located in moderate income census tracts and was also below the aggregate by number, which made 9.7% by number in moderate-income census tracts. However, M&T's small business lending in moderate-income census tracts by dollar slightly exceeded the aggregate, which made 10.1% by dollar in moderate-income census tracts.

In 2014-2017, the bank's small business lending performance was consistent with 2018 performance. In low-income census tracts in 2014 and 2015, small business lending was below the demographic and comparable to the aggregate. In 2016, small business lending in low-income census tracts was below the demographic and the aggregate. The bank's small business lending in

low-income census tracts in 2017 was below the demographic and exceeded the aggregate. The bank's small business lending in moderate-income census tracts for 2014, 2015 and 2016 exceeded the demographic and the aggregate. The bank's small business lending in moderate-income census tracts for 2017 was below the demographic and the aggregate.

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

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in the MSA 45060 (Syracuse, NY) assessment area.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers, which comprised 8.2% by number and 3.6% by dollar, was comparable the aggregate lending data, at 9.7% by number and 5.4% by dollar. However, 2018 performance for home purchase was significantly below the demographic figure, at 20.7%. The bank's lending to moderate-income borrowers, at 34.7% by number and 22.8% by dollar, significantly exceeded both the aggregate lending data, at 24.2% by number and 18.3% by dollar, and the demographic figure at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Performance exceeded the aggregate in 2016 and 2017 but was comparable to the aggregate in 2015. The bank's 2014 lending was below aggregate lending and significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was slightly below the 2018 performance. The bank's lending in 2016 and 2017 was consistent with 2018 performance, exceeding the demographic figure, but was comparable to aggregate lending. Lending in 2015 exceeded both the demographic and aggregate lending data while 2014 lending was above the demographic but below the aggregate.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 16.2% by number and 10.1% by dollar, was above the aggregate lending data, at 11.2% by number and 7.5% by dollar. However, lending to low-income borrowers was slightly below the demographic figure, at 20.7%. The bank's lending to moderate-income borrowers, at 20.1% by number and 15.1% by dollar, was comparable to the aggregate lending data at 20.1% by number and 15.4% by dollar, and above the demographic figure, at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. The bank's refinance lending in 2014, 2015, and 2016 to low-income borrowers was significantly below the demographic figure and below the aggregate lending data. In 2017, refinance lending was below the demographic but comparable to the aggregate. The bank's lending to moderate-income borrowers in 2014-2017 was comparable to the 2018 performance. The bank's refinance lending exceeded the demographic in 2014 and 2017, but was consistent with the aggregate lending data. In 2015 and 2016, refinance lending was slightly below the demographic figure and below the aggregate.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 9.8% by number and 6.1% by dollar, was comparable to the aggregate lending data, at 8.6% by number and 6.6% by dollar, while it fell below the demographic figure, at 20.7%. The bank's lending to moderate-income borrowers, at 14.7% by number and 9.6% by dollar, was slightly below the aggregate lending data at 17.3% by number and 12.4% by dollar and the demographic figure at 16.6%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate lending in 2016 and 2017, while 2015 and 2014 performance was comparable to the aggregate. In each year, the bank's lending fell below the demographic figure with the exception of 2016, which was comparable to the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 exceeded 2018 performance, as it exceeded both the aggregate lending data, and the demographic figures.

Small Business

The distribution of borrowers reflected, given the product lines offered, adequate penetration among businesses of different sizes for small business loans. In 2018, the bank originated 59.4% of loans by number and 27.6% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data, at 43.2% by number and 30.1% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 88.4%. While the bank's loan volume was significantly below the demographic figure, the bank originated 67.9% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. While lending in 2017 was comparable to the aggregate lending data, it significantly fell below the demographic figure. The bank's lending in 2014, 2015 and 2016 to small businesses exceeded aggregate lending yet still significantly fell below the demographic figure.

Community Development Lending

M&T was a leader in making community development loans in MSA 45060 (Syracuse, NY) with 35 loans, totaling $277.8 million. M&T ranked 3rd out of five similarly-situated banks when comparing annualized community development loans to deposits within MSA 45060 (Syracuse, NY).

M&T's lending efforts, by dollar, were targeted to revitalization and stabilization, which represented $177.8 million or 64.0% of community development lending activity.

Examples of community development initiatives included:

- A $30 million loan to a hospital located in a low-income tract in an area designated as Syracuse's Federal Renewal Community. The loan will be used to finance a power facility, as well as an electronic medical record system. The hospital will help revitalize the local community and jobs for residents.
- A $3.6 million loan to finance demolition and site work of the former Kennedy Square Public Housing site in Syracuse. The loan assists in the project to revitalize the area with office, residential, and retail properties. The project is in part financed with grants from New York State's Empire Development Corporation.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	6	28,013
Community Services	13	40,615
Economic Development	4	31,250
Revitalize and Stabilize	12	177,878
Total	**35**	**$277,756**

- A $20 million loan to finance renovations to a nursing facility for seniors. Over 50% of the revenues of the facility come from Medicaid.

INVESTMENT TEST

M&T's performance in MSA 45060 (Syracuse, NY) is based on the following summary. M&T made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made extensive use of innovative or complex investments to support community development activities and exhibited good responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 9 qualified investments totaling $34.6 million, in the MSA 45060 (Syracuse, NY). Investments consisted of $28.2 million during the current period and $6.3 million outstanding from the prior period. When compared to five similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked fifth.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 45060 (Syracuse, NY)- New	2	20,961	0	0	1	6,600	2	665	5	28,226
MSA 45060 (Syracuse, NY) – Prior Period	4	6,347	0	0	0	0	0	0	4	6,347
Total	6	27,308	0	0	1	6,600	2	665	9	34,573

The following are examples of qualified investments that met critical needs in the assessment area:

- A $6.6 million investment in state funded bonds used to finance expansion of an SBA eligible business. Expansion of the business will bring additional jobs for low- and moderate-income individuals.
- A $10.0 million investment in a LIHTC project, consisting of the adaptive reuse and historic rehab of a four-story former knitting mill built in 1918. Twenty units will be reserved for families at or below 50% of AMI and 15 units for families at or below 60% of AMI.
- A $350,000 bond in which proceeds will be utilized for a municipal streetscape project that will help in revitalization of a moderate-income geography.

In addition to qualified investments, the bank made grants or donations totaling $1.4 million to 171 organizations in the assessment area during the evaluation period. The grants and donations were comprised of funds primarily for community services.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 45060 (Syracuse, NY)	10	99,600	158	1,263,535	2	54,000	1	25,000	171	1,442,135

SERVICE TEST

M&T's performance under the service test in MSA 45060 (Syracuse, NY) was based on delivery systems that were accessible to the bank's geographies and individuals of different income levels in its assessment areas, changes in branch locations did not adversely affect accessibility of its delivery systems particularly in LMI geographies and to LMI individuals, and hours and services that did not vary in a way that inconvenienced its assessment area, particularly LMI geographies and/or LMI individuals. M&T provided a relatively high level of community development services within the assessment area.

Retail Services

M&T's delivery systems were reasonably accessible to geographies and individuals of different income levels in this assessment area. M&T operated 28 branches in the MSA 45060 (Syracuse, NY). One (3.6%) of these branches was in a low-income area and three (10.7%) were in moderate-income areas. In comparison, 11.4% and 13.0% of the assessment area population resided in low- and moderate-income areas, respectively.

Alternative delivery systems did not enhance M&T's performance in the assessment area. M&T had five off-site ATM locations in the Syracuse MSA, none of which were in low or moderate-income tracts.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. M&T closed one branch in MSA 45060, which was in a middle-income tract.

The bank's products and services did not vary in a way that inconvenienced its assessment area, particularly LMI areas geographies and/or LMI individuals. Of the 28 branches in the assessment area, none had extended hours. Nine or 32.1% of the branches, maintained Saturday hours. Of the four branches in LMI census tracts, three or 75.0% had Saturday hours.

Community Development Services

M&T provided a relatively high level of community development services in MSA 45060 (Syracuse, NY). The table shows the type and number of community development services the bank performed during the evaluation period. The bank's management and staff served on the board of directors for 64 nonprofit and community-based organizations in this assessment area.

COMMUNITY DEVELOPMENT SERVICES MSA 45060	
Purpose	**#**
Financial Education	200
Technical Assistance	4
Small Business Seminars	7
Board Participation	64
Total	**275**

METROPOLITAN AREA

(FULL REVIEW)

MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)

As of December 31, 2018, M&T operated 13 branches in the MSA 10580 (Albany-Schenectady-Troy, NY), representing 7.4% of the bank's branches in New York. As of June 30, 2018, M&T held $1.6 billion or 4.2% of its total deposit base in New York State in MSA 10580 (Albany-Schenectady-Troy, NY). Of the bank's total HMDA-related and small business originations made in the New York State assessment areas, M&T had 4.7% of lending in this assessment area.

The bank competes with several regional institutions but has been quite successful in capturing the MSA market share. M&T captured a deposit market share of 5.6%, ranking 5th in deposits among the 24 depository institutions operating in this assessment area. Other leaders in terms of deposit market share include KeyBank N.A., NBT Bank N.A., Citizens Bank N.A, Trust Co Bank, Bank of America N.A., and Community Bank N.A.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews with local nonprofit agencies in the assessment area.

The first contact was conducted with an organization that provides housing counseling, legal services, and tenant advocacy in the Capital Region and Northeastern New York. The contact indicated that M&T Bank has been a strong partner in mortgage lending, has been engaged in the community and responsive to its needs. The contact stated that M&T funds community events throughout the Capital Region and the bank's direct monetary assistance to agencies has been invaluable in assisting clients in obtaining affordable loans for home ownership.

Another contact was conducted with an organization that is part of an Albany based network of rural housing professionals that work toward a goal to design, develop, finance, rehabilitate, build, and manage affordable housing. The organization provides technical assistance and training to organizations, communities, and banks to improve housing in rural New York State. The contact identified several possible problem areas with rural housing, including low housing values coupled with high costs to build or fixing housing, which disincentivized investment in home improvement. In addition, the contact noted that towns and organizations lack the expertise and knowledge about LIHTC's to enter the market.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 10580 (Albany-Schenectady-Troy, NY) consisted of Albany County, Rensselaer County, Saratoga County, and Schenectady County and excluded Schoharie County. According to the 2015 ACS, in 2018, the MSA 10580 assessment area population totaled 845,933. The assessment area contained 15.8% of the bank's New York State combined assessment area population. In 2018, of the 210 census tracts in the assessment area, 21 or 10.0%, were low-income, 39 or 18.6% were moderate-income, 101 or 48.1% were middle-income, 46 or 21.9% were upper-income and 3 or 1.4% were of unknown income.

Income Characteristics

In 2018, the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area had 200,849 families, of which 20.0% (7.3% of which were below the poverty level) were considered low-income and 17.6% were moderate-income.

The FFIEC median incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Albany County	$76,159	$83,085
Rensselaer County	$68,390	$76,726
Saratoga County	$81,251	$87,551
Schenectady County	$70,712	$76,417
MSA 10580 (Albany-Schenectady-Troy, NY)	$75,260	$80,705
State of New York	$67,405	$71,913

Housing Characteristics

In 2018, MSA 10580 (Albany-Schenectady-Troy, NY) had 378,947 housing units, of which 56.8% were owner-occupied and 31.2% were rental units. Of the available owner-occupied units, 15.6% were in LMI areas. In low-income census tracts, 56.1% of the housing units were rental units,

24.8% were vacant, and 19.1% were owner-occupied. In moderate-income census tracts, 60.4% of the housing units were either rental or vacant, and 39.6% were owner-occupied.

In 2018, the median age of housing stock in the assessment area was 58 years old, with 36.6% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans. The median housing value in the assessment area was $199,622, with an affordability ratio of 31.4. The median gross rent in the assessment area was $913 per month. Within the assessment area, 45.5% of all renters had rental costs that exceeded 30% of their incomes. The table on the next page presents housing characteristics from the U.S. Census and ACS between 2010 and 2015 in the assessment area and the State of New York.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Albany	$202,500	27.7	$208,400	28.7	$855	$919	7.5%
Rensselaer	$121,200	31.6	$179,100	28.7	$779	$875	12.3%
Saratoga	$221,100	29.4	$232,900	30.7	$871	$993	14.0%
Schenectady	$160,200	34.5	$165,800	35.1	$871	$993	14.0%
MSA 10580 (Albany-Schenectady-Troy, NY)	$189,593	30.5	$197,422	31.6	$831	$909	9.4%
State of New York	$303,900	18.3	$283,400	20.9	$977	$1,132	15.9%

Labor, Employment and Economic Characteristics

The Albany economy is heavily dependent on government, health care, and education with a growing high-tech industry. According to D&B data, the assessment area had a total of 35,558 businesses in 2018, of which 31,864 (89.6%) were small businesses with GAR of $1 million or less.

Unemployment rates in the assessment area were lower than other New York State assessment areas and steadily improved over the review period, indicating better economic conditions and potential lending opportunities in the assessment area.

U.S. Department of Labor Annual Unemployment Rates

Area	2014	2015	2016	2017	2018
Albany County	6.1	4.3	4.1	4.2	3.7
Rensselaer County	5.4	4.4	4.3	4.4	3.9
Saratoga County	4.7	4.1	3.8	4.0	3.5
Schenectady County	5.4	4.7	4.3	4.5	4.0
MSA 10580 (Albany-Schenectady-Troy, NY)	5.1	4.5	4.1	4.3	3.8
State of New York	6.9	6.3	5.8	5.7	4.2

Additional performance context data for this assessment area is provided in the subsequent MSA 10580 (Albany-Schenectady-Troy, NY) Assessment Area Demographics.

Assessment Area Demographics

Assessment Area: MSA 10580 (Albany-Schenectady-Troy, NY) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	21	10	11,600	5.8	4,110	35.4	40,246	20
Moderate-income	39	18.6	29,188	14.5	4,246	14.5	35,308	17.6
Middle-income	101	48.1	105,556	52.6	4,877	4.6	44,398	22.1
Upper-income	46	21.9	54,369	27.1	1,339	2.5	80,897	40.3
Unknown-income	3	1.4	136	0.1	10	7.4	0	0
Total Assessment Area	**210**	**100.0**	**200,849**	**100.0**	**14,582**	**7.3**	**200,849**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	33,751	6,458	3	19.1	18,937	56.1	8,356	24.8
Moderate-income	68,734	27,187	12.6	39.6	29,655	43.1	11,892	17.3
Middle-income	188,999	119,053	55.3	63	50,395	26.7	19,551	10.3
Upper-income	86,773	62,626	29.1	72.2	18,874	21.8	5,273	6.1
Unknown-income	690	86	0	12.5	308	44.6	296	42.9
Total Assessment Area	**378,947**	**215,410**	**100.0**	**56.8**	**118,169**	**31.2**	**45,368**	**12.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3,375	9.5	2,853	9	454	14.1	68	14.2
Moderate-income	4,372	12.3	3,909	12.3	413	12.9	50	10.4
Middle-income	17,550	49.4	15,846	49.7	1,449	45.1	255	53.1
Upper-income	10,126	28.5	9,154	28.7	868	27	104	21.7
Unknown-income	135	0.4	102	0.3	30	0.9	3	0.6
Total Assessment Area	**35,558**	**100.0**	**31,864**	**100.0**	**3,214**	**100.0**	**480**	**100.0**
	Percentage of Total Businesses:			**89.6**		**9.0**		**1.3**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10580 (ALBANY-SCHENECTADY-TROY, NY)

LENDING TEST

M&T's performance under the lending test in MSA 10580 (Albany-Schenectady-Troy, NY) was based on the following summary. Lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment area, the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

This conclusion is based on adequate lending activity performance, good geographic performance, adequate borrower distribution performance, and an excellent level of community development loans. Greater weight was given to the analysis of HMDA lending for analysis of geographic and borrower distribution based on the loan volumes.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MSA 10580 (Albany-Schenectady-Troy, NY). This conclusion is based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA was considered adequate while small business-related lending was considered good. For the five-year evaluation period, lending activity totaled 3,018 loans consisting of 1,314 home purchase, 378 refinance, 117 home improvement and 1,209 small business loans. Lending activity declined on an annualized basis compared to the prior two-year period, during which lending activity totaled 1,822 loans consisting of 913 home purchase, 449 refinance, 67 home improvement, and 393 small business loans. Total HMDA and small business volume for the evaluation period decreased 33.7% on an annualized basis compared to the previous evaluation period. This annualized decrease was driven by annualized decreases in home purchase (-42.4%), refinance (-66.3%) and home improvement (-30.1%) lending. Small business loan volumes increased (23.1%) on an annualized basis. Analysis of the aggregate lending for the evaluation period indicated an annualized increase in aggregate lending volume overall.

M&T's market share of deposits and lending in the assessment area were generally stable. In 2018, M&T had a deposit market share of 5.6%, and lending market shares of 1.5% in home purchase lending, 1.6% in refinance, 1.4% in home improvement and 1.6% in small business lending. In comparison, the deposit market share in 2014 was 5.1%, with lending market shares of approximately 3.4% in home purchase lending, 1.5% in refinance lending, 1.2% in home improvement lending, and 2.4% in small business lending.

Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. Lending penetration in LMI tracts was excellent for home purchase loans, good for small business loans and home improvement loans and adequate for refinance loans.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 78.6% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, the bank penetrated 76.2% of low-income tracts and 71.8% of moderate-income tracts for HMDA and small business lending. Overall penetration of different income levels in 2015 and 2017 for HMDA and small business lending was comparable, as the bank penetrated 77.6% of all census tracts in 2017 and 76.7% in 2015. Overall penetration of different income levels in 2014 and 2016 for HMDA and small business lending was higher, as the bank penetrated 86.7% of all census tracts in 2016 and 83.8% in 2014.

MSA 10580 (Albany-Schenectady-Troy, NY)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	21	5	76.2%
Moderate	39	11	71.8%
Middle	101	20	80.2%
Upper	46	6	87.0%
Unknown	3	3	0.0%
Total Tracts	210	45	78.6%
2017			
Low	21	7	66.7%
Moderate	39	10	74.4%
Middle	101	22	78.2%
Upper	46	5	89.1%
Unknown	3	3	0.0%
Total Tracts	210	47	77.6%
2016			
Low	24	5	79.2%
Moderate	33	4	87.9%
Middle	105	17	83.8%

Upper	47	1	97.9%
Unknown	1	1	0.0%
Total Tracts	210	28	86.7%
2015			
Low	24	9	62.5%
Moderate	33	11	66.7%
Middle	105	24	77.1%
Upper	47	4	91.5%
Unknown	1	1	0.0%
Total Tracts	210	49	76.7%
2014			
Low	24	9	62.5%
Moderate	33	6	81.8%
Middle	105	15	85.7%
Upper	47	3	93.6%
Unknown	1	1	0.0%
Total Tracts	210	34	83.8%

Home Purchase

The geographic distribution of home purchase loans reflected excellent penetration throughout the assessment area. In 2018, M&T made 10.8% by number and 4.9% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts exceeded the 3.0% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 3.2% by number and 1.9% by dollar in low-income census tracts. In 2018, the bank made 17.9% by number and 9.6% by dollar of home purchase loans in moderate-income census tracts, exceeding the 12.6% of owner-occupied housing units located in moderate-income census tracts. M&T's home purchase lending also exceeded the aggregate, which made 13.9% by number and 9.2% by dollar in moderate-income census tracts.

In 2014-2017, the bank's home purchase lending in low-income census tracts was consistent with 2018 performance, as performance in 2015-2017 exceeded the demographic and the aggregate while 2014 performance was below the demographic and the aggregate. Performance from 2014-2017 in moderate-income census tracts was also consistent with 2018's performance as lending exceeding both the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans throughout the assessment area reflected adequate penetration. In 2018, M&T made 3.5% by number and 2.6% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, exceeded the 3.0% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 2.2% by number and 1.4% by dollar in low-income census tracts. In 2018, the bank made 5.9% by number and 3.9% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number was below the 12.6% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 10.3% by number and 7.5% by dollar in moderate-income census tracts.

The bank's performance from 2014-2017 was consistent with 2018 performance. In low-income tracts in 2014, the bank's refinance lending was comparable to the demographic and exceeded the aggregate, while in 2015 it exceeded both the demographic and the aggregate. In 2016, refinance lending in low-income census tracts was below the demographic and the aggregate, while in 2017 M&T did not make any refinance loans in low-income census tracts. In moderate-income census tracts for 2014 and 2016, the bank's refinance lending exceeded the demographic and the aggregate, while in 2015 and 2017 refinance lending was below the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made 2.7% by number and 0.5% by dollar of home improvement loans in low-income census tracts. Home improvement lending in low-income census tracts, by number, was slightly below the 3.0% of owner-occupied housing units located in low-income census tracts, but exceeded the aggregate, which made 1.9% by number in low-income census tracts. M&T's home improvement lending in low-income census tracts by dollar amount volume was below the aggregate, which made 1.5% by dollar in low-income census tracts. In 2018, the bank made 10.8% by number and 8.7% by dollar of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts, by number, was below the 12.6% of owner-occupied housing units located in moderate-income census tracts, but exceeded the aggregate, which made 7.3% by number and 6.1% by dollar.

M&T's home improvement lending in 2014-2017 was consistent with 2018's performance. In 2014, 2016 and 2017, the bank's home improvement lending in low-income census tracts exceeded the demographic and the aggregate. In 2015, the bank did not make any home improvement loans in low-income census tracts. In moderate-income census tracts in 2014 and 2017, home improvement performance exceeded the demographic and the aggregate. In 2015, the bank did

not make any loans in moderate-income census tracts and, in 2016, home improvement performance was below the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018, M&T made 13.5% by number and 8.9% by dollar of small business loans in low-income census tracts exceeding the demographic of the assessment area of 9.5% of businesses located in low-income census tracts. M&T's small business lending in low-income census tracts, by number, also exceeded the aggregate, which made 9.0% by number in low-income census tracts; however, by dollar, the bank's lending was below the aggregate, which made 10.5% by dollar in low-income census tracts. In 2018, the bank made 7.9% by number and 3.5% by dollar of small business loans in moderate-income census tracts, which was below the demographic of the assessment area where 12.3% of businesses were located. M&T's small business lending was also below the aggregate, which made 10.7% by number and 11.8% by dollar in moderate-income census tracts.

M&T's small business lending overall in 2014-2017 was consistent with 2018's performance. In 2014, in low-income census tracts, small business lending was below the demographic and the aggregate. In 2015 and 2017, small business lending was generally comparable to the demographic and the aggregate. In 2016, small business lending exceeded the demographic and the aggregate. In moderate-income census tracts, the bank's small business lending in 2014 and 2015 exceeded the demographic and the aggregate, while in 2016 was comparable to the demographic and the aggregate. The bank's small business lending in moderate-income census tracts in 2017 was below the demographic and the aggregate.

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

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in the MSA 10580 (Albany-Schenectady-Troy, NY) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was adequate and lending to businesses with gross annual revenues of $1 million or less was adequate. Greater weight was given to the analysis of HMDA lending based on the loan volumes.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, excellent penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers, at 19.5% by number and 8.5% by dollar, exceeded the aggregate lending, at 9.2% by number and 5.1% by dollar, and was comparable to the demographic figure, at 20.0%. In addition, the bank's lending to moderate-income borrowers, at 37.4% by number and

26.3% by dollar, exceeded the aggregate lending data, at 25.9% by number and 19.9% by dollar, while significantly exceeding the demographic figure, at 17.6%.

M&T's lending to low-income borrowers for 2014-2017 was slightly below the bank's 2018 lending performance. Overall, lending to low-income borrowers exceeded the aggregate lending data, but performance was below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance, as the bank's lending exceeded the aggregate and significantly exceeded the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 12.9% by number and 6.0% by dollar, was consistent with the aggregate lending data, at 10.3% by number and 6.2% by dollar. However, the bank's lending was below the demographic figure, at 20.0%. The bank's lending to moderate-income borrowers, at 17.6% by number and 12.7% by dollar, was below the aggregate lending data, at 20.8% by number and 17.1% by dollar but consistent with the demographic figure, at 17.6%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. In 2014 and 2016, refinance lending to low-income borrowers was consistent with the aggregate lending data and below the demographic. In 2015 and 2017, refinance lending was below aggregate lending data and the demographic. The bank's lending to moderate-income borrowers in 2014-2017 was comparable to the 2018 performance. In 2015, lending exceeded both the aggregate lending and demographic figure, while 2016 and 2014 performance fell below both the aggregate lending and demographic figure. In 2017, the bank's lending, by number, was comparable with both the aggregate lending data and the demographic figure but was below the aggregate by dollar.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 10.8 % by number and 6.4% by dollar, was above the aggregate lending data, at 8.1% by number and 6.0% by dollar; however, performance was below the demographic figure, at 20.0%. The bank's lending to moderate-income borrowers, at 21.6 % by number and 19.9% by dollar, was above the aggregate lending data, at 18.7% by number and 15.9% by dollar and also exceeded the demographic figure, at 17.6%.

M&T's lending to low-income borrowers for 2014-2017 overall was consistent with the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending in 2017 and 2014 while was consistent with the demographic figure. Lending in 2015 and 2016 was below the aggregate data lending and was significantly below the demographic figure. The

bank's lending to moderate-income borrowers in 2014-2017 was consistent with the bank's 2018 performance. The bank's lending in 2014 and 2016 was consistent with the aggregate lending and above the demographic in 2014 but below the demographic figure in 2016. In 2015 and 2017, home improvement lending exceeded both the aggregate lending data, and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, adequate penetration among businesses of different sizes. In 2018, the bank originated 48.5% of loans by number and 22.1% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending slightly exceeded aggregate lending data by number, at 43.8%, and was below aggregate lending by dollar, at 27.3%. Performance was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 89.6%. While the bank's loan volume was significantly below the demographic figure, the bank originated 50.2% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was below 2018 lending. The bank's lending was below the aggregate lending data and significantly below the demographic figure. However, in 2016, the bank's lending was comparable to the aggregate lending data but still fell significantly below the demographic figure.

Community Development Lending

M&T's was a leader in making community development loans in MSA 10580 (Albany-Schenectady-Troy, NY) with 60 loan originations totaling $451.8 million, or 22.3% of the bank's community development activity in New York State. M&T ranked 1st out of five similarly-situated banks when comparing annualized community development loans to deposits within MSA 10580 (Albany-Schenectady-Troy, NY).

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	12	96,916
Community Services	13	75,273
Economic Development	17	60,390
Revitalize and Stabilize	18	219,292
Total	**60**	**$451,871**

M&T's lending, by dollar, was targeted to revitalization and stabilization, which represented $218.5 million or 48.5% of community development lending activity.

Examples of community development initiatives included:

- Two loans totaling $61.0 million for a revitalization of a brownfield site in a moderate-income tract, also located in a New York State Empire Zone.
- Two loans totaling $30.0 million to aid in the development, design, and construction of a state sponsored facility that will serve as a laboratory for energy efficient and renewable

energy technologies. The building is in a low-income tract and is part of the Nanotech initiative, which has resulted in the co-location of 300 corporate partners and the creation of more than 3,700 jobs.

- A $27.6 million loan to support 210 units of affordable housing in a low-income tract.
- Two loans totaling $37.5 million to a non-profit organization providing social services primarily for individuals with intellectual disabilities eligible to receive Medicaid.

INVESTMENT TEST

M&T's performance in MSA 10580 (Albany-Schenectady-Troy, NY) is based on the following summary. The bank made an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, and often in a leadership position. The bank made extensive use of innovative or complex investments to support community development initiatives and exhibited excellent responsiveness to credit and community development needs.

During the evaluation period, the bank made 13 qualified investments totaling $127.9 million, in the MSA 10580 (Albany-Schenectady-Troy, NY). Investments consisted of $123.1 million during the current period and $4.7 million outstanding from the prior period. When compared to six similarly-situated institutions with a majority of Outstanding ratings in the assessment area, M&T ranked third.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 10580 (Albany-Schenectady-Troy, NY) - New	3	60,438	0	0	0	0	2	62,694	5	123,132
MSA 10580 (Albany-Schenectady-Troy, NY MSA) – Prior Period	7	673	1	4,044	0	0	0	0	8	4,717
Total	10	61,111	1	4,044	0	0	2	62,694	13	127,849

The following are examples of qualified investments that met critical needs in the assessment area:

- A $30.5 million investment in bonds that support development of a major NYS-sponsored project. The project is for development of a nanotech center and will assist in revitalization of a low-income census tract.

- A $37.7 million investment in LIHTC project that supports the historic rehab of 70 row houses containing 210 family units. The project will reserve 80 units for tenants at 50% or less of AMI and 97 units for tenants at 60% or less of AMI.

- A $5.8 million investment in LIHTC to support an acquisition and rehab of a former skilled nursing facility. The facility will be converted it into affordable housing with 5 units reserved for tenants at 50% or less of AMI and91 units reserved for tenants at 60% or less of AMI.

In addition to qualified investments, the bank made grants or donations totaling $872 thousand to 280 organizations in the assessment area during the evaluation period. The majority of the grants and donations were comprised of funds for community services and affordable housing.

Qualified Community Development Donations by Purpose
October 1, 2014 – December 31, 2019

Area	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
MSA 10580 (Albany-Schenectady-Troy, NY)	50	228,515	222	603,794	7	38,800	1	500	280	871,609

SERVICE TEST

M&T was a leader in providing community development services in MSA 10580 (Albany-Schenectady-Troy, NY). Delivery systems in MSA 10580 (Albany-Schenectady-Troy, NY) were readily accessible to the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations did not adversely affect accessibility of its delivery systems particularly to LMI geographies and/or LMI individuals, and services did not vary in a way that inconvenienced the assessment area, including LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in this assessment area. M&T operated 13 branches in this assessment area, of which one (7.7%) was in a low- income area and two (15.4%) were in moderate-income areas, in comparison to 7.6% and 16.6% of the MSA's population residing in low- and moderate-income areas, respectively.

Alternative delivery systems enhanced the bank's performance in this assessment area group. M&T had four offsite ATM locations in the assessment area, two (50.8%) of which were located in LMI areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open nor close a branch within the assessment area.

The bank's hours and services did not vary in a way that inconvenienced the assessment area, including LMI geographies and/or LMI individuals. Of the 13 branches in the MSA, none had evening hours and six branches or 46.2% have Saturday hours. Similarly, of the three branches in LMI census tracts, none had extended or Saturday hours.

Community Development Services

M&T was a leader in providing community development services in MSA 10580 (Albany-Schenectady-Troy, NY). The table shows the type and number of community development services the bank performed during the evaluation period. The bank's management and staff served on the board of directors for 73 nonprofit and community-based organizations throughout this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	370
Technical Assistance	4
Small Business Seminars	3
Board Participation	73
Total	**450**

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 13780 (BINGHAMTON, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 13780 (BINGHAMTON, NY NJ)

A limited evaluation of M&T's performance in MSA 13780 (Binghamton, NY) was conducted. The assessment area consisted of the entirety of the MSA, including all of Broome and Tioga Counties, with the City of Binghamton as the principal city in the region. Binghamton was in the southern tier of New York State. The assessment area had a population of 248,292 with 198,093 residents in Broome County and 50,199 residents in Tioga County. The MSA 13780 (Binghamton, NY) area had 8,300 business establishments according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 13780 (Binghamton, NY)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	7	10.8	2.7	21.6
Moderate Income	10	15.4	9.3	16.9
Middle Income	34	52.3	60.1	21.6
Upper Income	14	21.5	27.9	39.9
Unknown	0	0.0	0.0	0.0
Total	**65**	**100.0**	**100.0**	**100.0**

M&T maintained 13 branches in the assessment area, of which five were in LMI census tracts. M&T ranked first in the MSA out of eight banks in deposit market share with 47.3% of all deposits in the assessment area. The bank held 3.9% of all M&T's deposits in the State of New York in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 13780 (BINGHAMTON, NY)

The overall lending test rating for the State of New York is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance, as lending activity was good while borrower and geographic distribution were adequate. M&T provided a relatively high

level of community development loans. M&T made seven community development loans for $22.2 million during the evaluation period. Investment test performance was consistent with the Outstanding performance in the State of New York, as the bank made four LIHTC investments totaling $36.1 million and maintained $248,155 outstanding on prior period investments. Additionally, the bank provided 134 community development grants totaling $548,160 during the evaluation period. Performance under the service test was consistent with the Outstanding rating for the State of New York. The bank operated thirteen branches in the assessment area, 5 (38.5%) of which were in LMI census tracts. In addition, the bank was a leader in providing community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 13780 (Binghamton, NY)	Consistent	Consistent	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 46540 (UTICA-ROME, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 46540 (UTICA-ROME, NY)

A limited evaluation of M&T's performance in MSA 46540 (Utica-Rome, NY) was conducted. Located in central New York State, the assessment area consisted the entire MSA, including all of Oneida and Herkimer Counties. The principal cities in the assessment area were the Cities of Utica, NY and Rome, NY, both of which were located in Oneida County. The assessment area had a population of 297,592, with 233,558 residents in Oneida County and 64034 residents in Herkimer County. According to 2018 D&B information, MSA 46540 (Utica-Rome, NY) had 9,487 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 46540 (Utica-Rome, NY)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	14	15.1	5.0	22.0
Moderate Income	10	10.8	7.2	16.9
Middle Income	45	48.4	60.0	21.5
Upper Income	18	19.4	27.8	39.6
Unknown	6	6.5	0.0	0.0
Total	**93**	**100.0**	**100.0**	**100.0**

M&T maintained 11 branches in the assessment area, one of which was in a low-income census tract and none in moderate-income tracts. M&T ranked second in the assessment area out of ten banks in deposit market share with 15.9% of all deposits in the assessment area. The assessment area had 1.8% of all M&T's deposits in the State of New York.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 46540 (UTICA-ROME, NY)

The overall lending test rating for the State of New York is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance, as lending activity, borrower distribution, and geographic distribution were good. The bank made a relatively high

level of community development loans. M&T made nine community development loans for $35.2 million during the evaluation period. Investment test performance was below the Outstanding performance in the State of New York, as the bank had one LIHTC investment for $8.0 million and grants and donations of $307,275. Service test performance was also below the Outstanding rating for the State of New York as the bank operated one (9.1%) of eleven branches in the assessment area in a low-income tract and none in moderate-income tracts. In addition, the bank provided an adequate level of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 46540 (Utica-Rome, NY)	Consistent	Below	Below

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 28740 (KINGSTON, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 28740 (KINGSTON, NY)

A limited evaluation of M&T's performance in MSA 28740 (Kingston, NY) was conducted. Located in the Hudson Valley of New York State, M&T's assessment area consisted of the entire MSA, including all of Ulster County. The principal city in the assessment area was Kingston, NY. The assessment area had a population of 297,592, all in Ulster County. According to 2018 D&B information, MSA 28740 (Kingston, NY) had 8,668 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 28740 (Kingston, NY)				
Income Category	***Tract Distribution***		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	1	2.1	1.8	21.9
Moderate Income	7	14.9	7.1	16.9
Middle Income	27	57.4	59.0	20.1
Upper Income	12	25.5	32.0	41.0
Unknown	0	0.0	0.0	0.0
Total	**47**	**100.0**	**100.0**	**100.0**

M&T maintained five branches in the assessment area, one of which was in a moderate-income census tract and none were in low-income tracts. M&T ranked third in the assessment area out of nineteen banks in deposit market share with 11.0% of all deposits in the assessment area. The assessment area held 0.9% of all M&T's deposits in the State of New York.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 28740 (KINGSTON, NY)

The overall lending test rating for the State of New York is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance, as lending activity was good while borrower and geographic distribution were adequate. The bank provided a relatively high level of community development loans. M&T made six community development loans for $5.7 million during the evaluation period. Investment test performance was below the Outstanding

performance in the State of New York, as the bank had two municipal bond investments for $1.2 million and grants and donations of $143,500. Service test performance was consistent with the Outstanding rating for the State of New York. In the assessment area, the bank operated five branches, one (20.0%) of which was in a moderate-income tract and none were in low-income tracts. The bank provided and adequate level of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 28790 (Kingston, NY)	Consistent	Below	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 27060 (ITHACA, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 27060 (ITHACA, NY)

A limited evaluation of M&T's performance in MSA 27060 (Ithaca, NY) was conducted. Located in central New York, M&T's assessment area consisted of the entire MSA, including all of Tompkins County. The principal city of the assessment area was Ithaca, NY. The assessment area had a population of 103,855, all in Tompkins County. According to 2018 D&B information, MSA 27060 (Ithaca, NY) had 3,896 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 27060 (Ithaca, NY)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	21.0
Moderate Income	4	17.4	12.2	16.7
Middle Income	12	52.2	70.6	21.2
Upper Income	6	26.1	17.2	41.0
Unknown	1	4.3	0.2	0.0
Total	**23**	**100.0**	**100.0**	**100.0**

M&T maintained two branches in the assessment area, both of which were in middle-income census tracts. M&T ranked second in the assessment area out of ten banks with 11.2% of all deposits in the MSA. The MSA had 0.6% of all M&T's deposits in the State of New York.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 27060 (ITHACA, NY)

The overall lending test rating for the State of New York was High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance. Borrower and geographic distribution of loans were both adequate in the assessment area. The bank was a leader in community development lending. M&T made seven community development loans for $30.9 million during the evaluation period. Investment test performance was below the Outstanding performance in the State of New York as the bank had one LIHTC investment for $5.3 million and

grants and donations of $191,250. Service test performance was below the Outstanding rating for the State of New York as the bank did not operate any branches in LMI census tracts and provided an adequate level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 27060 (Ithaca, NY)	Consistent	Below	Below

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 21300 (ELMIRA, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 21300 (ELMIRA, NY)

A limited evaluation of M&T's performance in MSA 21300 (Elmira, NY) was conducted. Located in the Southern Tier of New York State, M&T's assessment area consisted of the entire MSA, including all of Chemung County. The principal city in the assessment area was Elmira, NY. The assessment area had a population of 88,267, all in Chemung County. According to 2018 D&B information, MSA 21300 (Elmira, NY) had 2,681 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 21300 (Elmira, NY)				
Income Category	***Tract Distribution***		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	4	18.2	4.7	22.9
Moderate Income	3	13.6	8.5	16.0
Middle Income	11	50.0	56.3	21.0
Upper Income	3	13.6	30.6	40.0
Unknown	1	4.6	0.0	0.0
Total	**22**	**100.0**	**100.0**	**100.0**

M&T maintained one branch in the MSA, which was in a middle-income census tract. M&T ranked fifth in the MSA out of seven banks with 2.0% of all deposits in the assessment area. The assessment area had 0.6% of all M&T's deposits in the State of New York.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 21300 (ELMIRA, NY)

The overall lending test rating for the State of New York is High Satisfactory. M&T's lending test performance in the assessment area was below this performance. The bank's lending reflected adequate geographic and borrower distribution and M&T did not make any community development loans in the assessment area during the evaluation period. Investment test performance was below the Outstanding performance in the State of New York, as the bank did not have any community development investments and made only grants and donations of

$67,500. The service test performance was below the Outstanding rating for the State of New York. The bank operated one branch in the assessment area, which was not located in an LMI census tract. The institution provided a limited level of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 21300 (Elmira, NY)	Below	Below	Below

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 48060 (WATERTOWN-FT. DRUM, NY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 48060 (WATERTOWN-FT. DRUM, NY)

A limited evaluation of M&T's performance in MSA 48060 (Watertown-Ft. Drum, NY) was conducted. Located in central New York State along Lake Ontario, M&T's assessment area consisted of the entire MSA48060 (Watertown-Ft. Drum, NY), including all of Jefferson County. The principal city in the assessment area was Watertown, NY with the U.S. Army base at Ft. Drum, NY providing a substantial part of the population and employment for the assessment area. The assessment area had a population of 118,947, all in Jefferson County. According to 2018 D&B information, MSA 48060 (Watertown-Ft Drum, NY) had 3,561 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 48060 (Watertown-Ft Drum, NY)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	19.8
Moderate Income	5	19.2	7.9	18.3
Middle Income	17	65.4	83.2	22.4
Upper Income	2	7.7	8.9	39.5
Unknown	2	7.7	0.0	0.0
Total	**26**	**100.0**	**100.0**	**100.0**

M&T maintained one branch in the assessment area, which was located in a middle-income census tract. M&T ranked seventh in the assessment area out of ten banks with 1.8% of all deposits in the MSA. The assessment area had 0.6% of all M&T's deposits in the State of New York.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 48060 (WATERTOWN-FT. DRUM, NY)

The overall lending test rating for the State of New York was rated High Satisfactory. M&T's lending test performance in the assessment area was below this performance. The bank's borrower and geographic distribution were both adequate. The bank provided an adequate level of

community development loans, as M&T made four community development loans in the assessment area for $10.4 million during the evaluation period. Investment test performance was below the Outstanding performance in State of New York, as the bank had one investment for $25.4 million related to community service activity and $78,500 in grants and donations. Service test performance was below the Outstanding rating for the State of New York, as the bank operated one branch in the assessment area, which was not located in an LMI census tract. In addition, the bank provided an adequate level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 48060 (Watertown-Ft. Drum, NY)	Below	Below	Below

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN NEW YORK GROUP A (ALLEGANY, CATTARAUGUS, CHAUTAUQUA, GENESEE, STEUBEN, AND WYOMING COUNTIES)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN NEW YORK GROUP A (ALLEGANY, CATTARAUGUS, CHAUTAUQUA, GENESEE, STEUBEN, AND WYOMING COUNTIES)

A limited evaluation of M&T's performance in the Non-Metropolitan NY Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, and Wyoming Counties) was conducted. M&T's assessment area consisted of the six counties in their entirety. The assessment area had a population of 459,247, with 48,070 residing in Allegany, 78,962 residing in Cattaraugus, 132,646 residing in Chautauqua, 59,458 residing in Genesee, 98,665 residing in Steuben, and 41,446 residing in Wyoming. The assessment area had 15,145 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Group A, NY				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	3	2.4	0.5	21.7
Moderate Income	11	8.7	6.8	18.8
Middle Income	102	81.0	87.7	22.1
Upper Income	7	5.6	5.1	37.4
Unknown	3	2.4	0.0	0.0
Total	**126**	**100.0**	**100.0**	**100.0**

M&T maintained 18 branches in the six counties. Four of the 18 branches were located in LMI census tracts. M&T ranked fourth in Non-Metropolitan New York Group A out of 26 banks with 10.3% of all deposits. Within the State of New York, 2.0% of all M&T's deposits were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN NEW YORK GROUP A (ALLEGANY, CATTARAUGUS, CHAUTAUQUA, GENESEE, STEUBEN, AND WYOMING COUNTIES)

The overall lending test rating for the State of New York is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance, as lending activity and borrower distribution performance was good while geographic distribution was adequate. M&T made a relatively high level of community development loans. M&T made 13 community development loans for $41.5 million in the six counties. Investment test performance was consistent with the Outstanding performance in the State of New York, as the bank made nine current period investments for $6.1 million and had outstanding balances of $1.6 million on prior period investments. A total of $258,400 in grants and donations were made to various organizations that primarily supported community service activity. The service test performance was below the Outstanding rating for the State of New York. The bank operated 18 branches in the assessment area, of which two were located in low-income and two were located in moderate-income census tracts. The bank provided an adequate level of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan New York, Group A	Consistent	Consistent	Below

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN NEW YORK GROUP B (CAYUGA, CHENANGO, CORTLAND, AND SENECA COUNTIES)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN NEW YORK GROUP B (CAYUGA, CHENANGO, CORTLAND, AND SENECA COUNTIES)

A limited evaluation of M&T's performance in the Non-Metropolitan New York Group B (Cayuga, Chenango, Cortland, and Seneca Counties) area was conducted. M&T's assessment area consisted of the four counties in their entirety. The assessment area had a population of 212,909, with 79,173 in Cayuga, 49,549 in Chenango, 49,043 in Cortland, and 35,144 in Seneca. The assessment area had 7,145 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Group B, NY				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	1	1.9	0.7	18.7
Moderate Income	4	7.4	5.0	16.8
Middle Income	39	72.2	75.0	22.2
Upper Income	9	16.7	19.3	42.3
Unknown	1	1.9	0.0	0.0
Total	**54**	**100.0**	**100.0**	**100.0**

M&T maintained four branches in the assessment area. One of the four branches was located in a moderate-income census tract. M&T ranked ninth in Non-Metropolitan New York Group B out of 15 banks with 4.3% of all deposits. Within the State of New York, 0.4% of all M&T's deposits were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN NEW YORK GROUP B (CAYUGA, CHENANGO, CORTLAND, AND SENECA COUNTIES)

The overall lending test rating for the State of New York is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance, as lending activity was excellent, while borrower and geographic distribution performance was adequate. The bank provided a relatively high level of community development loans. M&T made seven community development loans for $49.6 million in the four counties. Investment test performance was below the Outstanding performance in the State of New York, as the bank had outstanding balances of $553,154 on prior period investments but made no new investments for the evaluation period. A total of $51,200 in grants and donations were made to various organizations that supported community service activity. Service test performance was also below the Outstanding rating for the State of New York. The bank operated four branches in the assessment area, of which one was located in a moderate-income census tract. The bank provided an adequate level of community development service.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan New York, Group B	Consistent	Below	Below

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN NEW YORK GROUP C (SULLIVAN COUNTY)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN NEW YORK GROUP C (SULLIVAN COUNTY)

A limited evaluation of M&T's performance in the Non-Metropolitan New York Group C (Sullivan County) area was conducted. M&T's assessment area consisted of all of Sullivan County. The assessment area had a population of 76,330, all in Sullivan County. The assessment area contained 2,774 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Group C, NY				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	20.5
Moderate Income	4	13.2	5.0	16.5
Middle Income	17	67.2	75.0	21.3
Upper Income	3	19.6	19.3	41.7
Unknown	0	0.0	0.0	0.0
Total	**24**	**100.0**	**100.0**	**100.0**

M&T maintained two branches in the assessment area. Both of the branches were located in middle-income census tracts. M&T ranked eighth in Non-Metropolitan New York Group C out of 10 banks with 5.4% of all deposits. Within the State of New York 0.2% of all M&T's deposits were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN NEW YORK GROUP C (SULLIVAN COUNTY)

The overall lending test rating for the State of New York is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance as lending activity and borrower distribution performance was good while geographic distribution was adequate. M&T provided a relatively high level of community development loans. M&T made four community development loans for $4.4 million in Sullivan County. Investment test performance was below

the Outstanding performance in the State of New York, as the bank made one LIHTC investment for $3.6 million and had outstanding balances of $581,197 million on prior period investments. A total of $9,250 in grants and donations were made to various organizations. Service test performance was below the Outstanding rating for the State of New York. The bank operated two branches in the assessment area, neither of which were located in LMI census tracts and M&T provided an adequate level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan New York Group C	Consistent	Below	Below

STATE OF PENNSYLVANIA

CRA RATING FOR PENNSYLVANIA[12]: SATISFACTORY

The Lending test is rated: High Satisfactory

The Investment test is rated: High Satisfactory

The Service test is rated: High Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected good penetration throughout the bank's assessment areas.
- The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and very small businesses.
- Made a relatively high level of community development loans.

Investment Test:

- A significant level of qualified investments and grants, particularly those not routinely provided by investors, occasionally in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.
- Exhibited good responsiveness to credit and community development needs.

[12] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

Service Test:

- Delivery systems were readily accessible to geographies and individuals of different income levels in its assessment area.
- Record of opening and closing branches did not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced the needs of its assessment areas particularly in LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

SCOPE OF EXAMINATION

Examiners conducted full-scope reviews of the following five assessment areas in the State of Pennsylvania: MSA 49620 (York-Hanover, PA), MSA 25420 (Harrisburg-Carlisle, PA), MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA), MSA 39740 (Reading, PA), and MSA 11020 (Altoona, PA). M&T's combined full-scope areas make up 72.6% of the deposits and 58.1% of the loans originated in the Pennsylvania assessment areas during the review period. In order to derive the state rating, the full-scope assessment areas were weighted based on the proportion of loan originations, deposits, and branches in each area. Limited reviews were conducted of the remaining Pennsylvania assessment areas:

- MSA 14100 (Bloomsburg-Berwick, PA)
- MSA 16540 (Chambersburg-Waynesburg, PA)
- MSA 20700 (East Stroudsburg, PA)
- MSA 23900 (Gettysburg, PA)
- MSA 29540 (Lancaster, PA)
- MSA 30140 (Lebanon, PA)
- MSA 44300 (State College, PA)
- MSA 48700 (Williamsport, PA)
- PA Non-Metropolitan AA Group A (Bradford and Sullivan Counties)
- PA Nonmetropolitan area Group B (Northumberland, Schuylkill, Snyder, and Union Counties)

- PA Nonmetropolitan area Group C (Bedford County and a portion of Huntingdon County)
- PA Nonmetropolitan area Group D (Clearfield and Clinton Counties)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PENNSYLVANIA

Outside of the multi-state assessment areas, Pennsylvania had M&T's second largest branch presence, third largest proportion of deposits, and second largest proportion of loans. As of December 31, 2018, M&T operated 18.1% of its branches in the State of Pennsylvania. The FDIC reported that as of June 30, 2018, 9.5% of all M&T's branch deposits were held in the Pennsylvania assessment areas. Pennsylvania also generated approximately 15.2% of the bank's combined total home purchase, home improvement, refinance, and small business originations during 2018.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

M&T's lending test performance in the State of New York is rated High Satisfactory. M&T's lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment areas, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made a relatively high level community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in all full scope assessment areas, when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in each assessment area.

Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration throughout the State of Pennsylvania. This conclusion is based on good distribution in each full scope assessment area. There were no significant lending gaps in the assessment area. For details, refer to the Geographic Distribution of Loans section for each full-scope assessment area.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes. This conclusion is based on good performance in each full scope assessment area.

Community Development Lending

M&T made a relatively high level of community development loans in the State of Pennsylvania. This conclusion is based on the bank making a relatively high level of community development loans in MSA 25420 (Harrisburg-Carlisle, PA), MSA 49620 (York-Hanover, PA), and MSA 11020 (Altoona, PA).

M&T made an adequate level of community development loans in the MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) and MSA 39740 (Reading, PA) assessment areas.

During the evaluation period, M&T originated 70 community development loans, totaling $253.6 million in the State of Pennsylvania. Community development lending efforts included all areas of community development, particularly directed to community service initiatives and the revitalization and stabilization of LMI geographies. Community contacts in the state identified revitalization and stabilization as an as an important credit need in the state.

M&T did not make any community development loans in the State of Pennsylvania outside of its assessment areas that benefited the broader statewide or regional area including the assessment areas.

INVESTMENT TEST

M&T's performance under the Investment Test in Pennsylvania is rated High Satisfactory. In the state, M&T had a significant level of qualified investments and grants, particularly those not routinely provided by investors, occasionally in a leadership position, made occasional use of innovative and/or complex investments to support community development initiatives and exhibited good responsiveness to credit and community development needs.

M&T made 25 new qualified investments, totaling $70.6 million in the State of Pennsylvania. Investment activity was primarily conducted in the full scope assessment areas of: MSA 49620 (York-Hanover, PA) with $6.8 million of investments; MSA 25420 (Harrisburg-Carlisle, PA) with $23.0 million; MSA 42540 (Scranton-Wilkes-Barre-Hazelton, PA) with $12.8 million, MSA 11020 (Altoona, PA) with $143 thousand; and MSA 39740 (Reading, PA) with $7.1 million. The remainder of investments were made in limited scope assessment areas and in the broader statewide or regional area including the assessment area.

In addition, M&T had $14.9 million in prior period investment activity. Investment activity included $260 thousand made in the broader statewide or regional area including its assessment area.

M&T also made approximately $10.2 million in grants and donations in the State of Pennsylvania.

SERVICE TEST

M&T's performance under the service test in the State of Pennsylvania is rated High Satisfactory. This test considered the following criteria of retail and community development services in full scope assessment areas.

Retail Services

Retail delivery systems were readily accessible to the bank's geographies and individuals of different income levels in its assessment areas. M&T had 136 branches in Pennsylvania, which represented 18.1% of M&T's total branches. M&T's record of opening and closing offices did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals. Business hours and services did not vary in a way that inconvenienced its assessment area, including LMI geographies and/or LMI individuals in the full scope assessments areas in Pennsylvania.

Community Development Services

M&T had a relatively high level of community development services in Pennsylvania.

Summary of Key Assessment Area Data: State of Pennsylvania Assessment Areas

	MSA 49620	MSA 25420	MSA 42540	MSA 16540	MSA 11020	MSA 39740	MSA 29540	MSA 44300	MSA 48700	MSA 30140	MSA 23900	MSA 14100	MSA 20700	Non Metro Group A	Non Metro Group B	Non Metro Group C	Non Metro Group D	PA Totals
Total Population[4]	439,660	512,521	561,701	152,285	126,448	413,965	530,216	157,823	116,656	135,776	101,767	85,420	167,881	68,609	325,370	52,684	130,957	4,079,739
Population % of AA population	10.8%	12.6%	13.8%	3.7%	3.1%	10.1%	13.0%	3.9%	2.9%	3.3%	2.5%	2.1%	4.1%	1.7%	8.0%	1.3%	3.2%	100.0%
Families	116,539	131,488	141,530	40,598	32,758	105,998	137,133	32,532	29,537	35,976	27,376	21,422	41,743	18,310	83,529	14,988	31,095	1,042,552
Families % of AA families	11%	13%	14%	4%	3%	10%	13%	3%	3%	3%	3%	2%	4%	2%	8%	1%	3%	100%
Total Census Tracts[4]	90	114	170	27	34	90	98	31	29	31	23	19	33	16	82	12	29	928
Tracts % AA tracts	9.7%	12.3%	18.3%	2.9%	3.7%	9.7%	10.6%	3.3%	3.1%	3.3%	2.5%	2.0%	3.6%	1.7%	8.8%	1.3%	3.1%	100.0%
LMI tracts	20	37	48	5	7	26	20	7	6	7	1	3	5	0	13	0	4	209
LMI tracts % all AA LMI tracts	9.6%	17.7%	23.0%	2.4%	3.3%	12.4%	9.6%	3.3%	2.9%	3.3%	0.5%	1.4%	2.4%	0.0%	6.2%	0.0%	1.9%	100.0%
Total Owner-Occupied Units[4]	124,269	137,399	152,184	42,014	36,617	110,223	134,548	34,606	32,187	36,836	29,536	23,786	44,899	20,390	93,351	17,135	35,104	1,105,084
Units % of AA units	11.2%	12.4%	13.8%	3.8%	3.3%	10.0%	12.2%	3.1%	2.9%	3.3%	2.7%	2.2%	4.1%	1.8%	8.4%	1.6%	3.2%	100.0%
Business Establishments[5]	17,798	24,432	24,631	6,323	4,889	16,751	24,426	6,053	5,055	5,172	4,630	3,319	6,029	2,408	11,793	2,386	4,483	170,578
Bus. est. % AA bus. est.	10.4%	14.3%	14.4%	3.7%	2.9%	9.8%	14.3%	3.5%	3.0%	3.0%	2.7%	1.9%	3.5%	1.4%	6.9%	1.4%	2.6%	100.0%
Number of Branches[1]	25	20	11	10	10	13	8	4	3	1	1	3	1	3	18	3	2	136
Branches % all branches	18.4%	14.7%	8.1%	7.4%	7.4%	9.6%	5.9%	2.9%	2.2%	0.7%	0.7%	2.2%	0.7%	2.2%	13.2%	2.2%	1.5%	100.0%
Branches in LMI tracts	5	6	2	2	3	1	0	2	1	1	1	1	0	0	5	0	0	30
LMI branches % AA LMI branches	16.7%	20.0%	6.7%	6.7%	10.0%	3.3%	0.0%	6.7%	3.3%	3.3%	3.3%	3.3%	0.0%	0.0%	16.7%	0.0%	0.0%	100.0%
Branch Deposits ($'000,000s)[2]	1,846	1,754	1,042	411	819	655	364	259	33	83	74	97	33	126	653	105	77	8,431
Deposits % AA deposits	21.9%	20.8%	12.4%	4.9%	9.7%	7.8%	4.3%	3.1%	0.4%	1.0%	0.9%	1.2%	0.4%	1.5%	7.7%	1.2%	0.9%	100.0%
Deposit Market Share (%)/ Rank	25,1% 1/15	12.7% 2/25	8.2% 3/22	19.0% 3/7	31.9% 1/14	4.0% 7/17	3.3% 7/22	7.5% 5/16	13.7% 4/12	3.7% 7/11	5.0% 4/4	7.0% 5/8	1.2% 13/15	9.8% 4 of 6	13,4% 1 of 25	7.5% 6 of 16	4.1% 9 of 14	*18.5% 2 of 83*
Home Purchase Originations[3]	121	60	74	35	15	28	37	28	8	8	18	6	10	26	53	8	8	543
HP originations % AA orig.	22.3%	11.0%	13.6%	6.4%	2.8%	5.2%	6.8%	5.2%	1.5%	1.5%	3.3%	1.1%	1.8%	4.8%	9.8%	1.5%	1.5%	100.0%
Refinance Originations[3]	389	195	207	170	66	130	76	57	24	39	41	26	7	36	157	17	31	1,668
Refi orig. % AA orig.	23.3%	11.7%	12.4%	10.2%	4.0%	7.8%	4.6%	3.4%	1.4%	2.3%	2.5%	1.6%	0.4%	2.2%	9.4%	1.0%	1.9%	100.0%
Home Improvement Originations[3]	128	48	78	40	38	54	40	24	13	6	16	7	6	11	53	9	17	588
Home Improvement orig. % AA orig.	21.8%	8.2%	13.3%	6.8%	6.5%	9.2%	6.8%	4.1%	2.2%	1.0%	2.7%	1.2%	1.0%	1.9%	9.0%	1.5%	2.9%	100.0%
Small Business Originations[3]	459	252	183	95	142	181	145	72	59	20	70	60	24	26	222	45	44	2,099
SB orig. % AA orig.	21.9%	12.0%	8.7%	4.5%	6.8%	8.6%	6.9%	3.4%	2.8%	1.0%	3.3%	2.9%	1.1%	1.2%	10.6%	2.1%	2.1%	100.0%
Combined Loan Totals	1,097	555	542	340	261	393	298	181	104	73	145	99	47	99	485	79	100	4,898
% of AA Orig.	22.4%	11.3%	11.1%	6.9%	5.3%	8.0%	6.1%	3.7%	2.1%	1.5%	3.0%	2.0%	1.0%	2.0%	9.9%	1.6%	2.0%	100.0%

(1) Branch numbers are as of 12/31/2018. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/18. (3)Originations are loans reported under HMDA or CRA small business reporting for 2018.
(4)Demographic information was obtained from the 2015 ACS. (5)Business establishments information was reported by D&B for 2018.

METROPOLITAN AREA

(FULL REVIEW)

MSA 49620 (YORK-HANOVER, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 49620 (YORK-HANOVER, PA)

MSA 49620 (York-Hanover, PA) is located in south central Pennsylvania and consists of York County. This assessment area was s a competitive marketplace where large regional banks compete with community banks, savings and loan associations, and non-financial institutions. M&T's primary competitors in this assessment area included PeoplesBank, Branch Banking and Trust Co., PNC Bank N.A., Santander Bank N.A., and Fulton Bank N.A.

As of December 31, 2018, M&T operated 25 branches in MSA 49620 (York-Hanover, PA). Based on deposits reported to the FDIC as of June 30, 2018, M&T ranked 1st in MSA 49620 (York-Hanover, PA), with $1.8 billion in deposits, or 25.1% of the retail deposit market.

Community Contacts

To ascertain the credit needs of the area, information was obtained through contact with a nonprofit agency. The contact indicated a need for affordable housing in the downtown area as there has been no development since 2013. The contact also noted there is a need for infrastructure to be updated and neighborhoods are in need of revitalization. The contact also indicated a need for youth programs, workforce training and programs aimed at reducing gun violence.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 49620 (York-Hanover, PA) consisted of York County and was the MSA in its entirety. According to the 2015 ACS, MSA 49620 (York-Hanover, PA) had a population of 439,660. The assessment area's population was spread throughout York County. The City of York was the largest municipality but contained only 10.0% of the total county population. Growth in the county was attributed to southern York County's proximity to the Baltimore and Washington, DC metropolitan areas, where home prices and the cost of living were considerably higher. The assessment area contained 10.8% of the bank's State of Pennsylvania combined assessment area population. Of the 90 census tracts in the assessment area, 13 or 14.4%,

were low-income, 7 or 7.8% were moderate-income, 55 or 61.1 were middle-income, and 15 or 16.7% were upper-income; there were no tracts with unknown income.

Income Characteristics

In 2018, the MSA 49620 (York-Hanover, PA) assessment area had 116,539 families, of which 19.4% (7.8% of which were below the poverty level) were considered low-income and 18.4% were moderate-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
County	**2010**	**2015**
MSA 49620 (York Hanover, PA)	$67,624	$69,846
State of Pennsylvania	$63,364	$68,158

Housing Characteristics

The 2015 ACS showed that in 2018 MSA 49620 (York-Hanover, PA) had 180,237 housing units, of which 68.9% were owner-occupied and 23.9% were rental units. Of the available owner-occupied units, 9.5% were located in LMI areas. In low-income census tracts, 57.1% of the housing units were rental units, 15.3% vacant, and 27.6% were owner-occupied. In moderate-income census tracts, 39.2% of the housing units were either rental or vacant, and 60.8% were owner-occupied.

The median age of housing stock in the assessment area was 42 years old, with 24.9% of the stock built before 1950. The median age of housing stock was 61years in low- and moderate-income tracts, which indicated a possible need for home improvement loans. According to the 2015 ACS, the median housing value in the assessment area was $168,400, with an affordability ratio of 34.6. The median gross rent in the assessment area was $851 per month. Within the assessment area, 47.3% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$175,478	32.8	$168,400	34.6	$747	$851	13.9%
State of Pennsylvania	$159,300	31.6	$166,000	32.3	$739	$840	13.7%

Labor, Employment and Economic Characteristics

The largest employers in York County included: York Hospital, Wal-Mart Stores, Giant Food Corporation, and Wellspan Medical Group. Employment within MSA 49620 (York-Hanover, PA) depended on the trade, transportation, and utilities sector with roughly 38,200 employees. In addition, the manufacturing sector, educational and health services sectors had a high concentration of employees, with 31,100 and 26,200, respectively.

According to D&B data, the assessment area had a total of 17,798 businesses in 2018, of which 16,134 (90.7%) were small businesses with GAR of $1 million or less.

Employment improved over the review period indicating improving economic conditions and potential lending opportunity. The table below shows the trends in the unemployment rate over the review period.

U.S. Department of Labor					
Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 49620 (York-Hanover, PA)	4.5	4.0	4.0	3.7	3.3
State of Pennsylvania	5.9	5.3	5.4	4.9	4.2

Additional performance context data for this assessment area is provided in the subsequent MSA 49620 (York-Hanover, PA) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: MSA 49620 (York-Hanover, PA) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	14.4	7,075	6.1	2,877	40.7	22,666	19.4
Moderate-income	7	7.8	6,922	5.9	861	12.4	21,428	18.4
Middle-income	55	61.1	81,147	69.6	4,872	6	25,979	22.3
Upper-income	15	16.7	21,395	18.4	513	2.4	46,466	39.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**90**	**100.0**	**116,539**	**100.0**	**9,123**	**7.8**	**116,539**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	14,983	4,133	3.3	27.6	8,559	57.1	2,291	15.3
Moderate-income	12,585	7,652	6.2	60.8	3,986	31.7	947	7.5
Middle-income	123,514	88,163	70.9	71.4	27,577	22.3	7,774	6.3
Upper-income	29,155	24,321	19.6	83.4	3,025	10.4	1,809	6.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**180,237**	**124,269**	**100.0**	**68.9**	**43,147**	**23.9**	**12,821**	**7.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,541	8.7	1,329	8.2	192	13.3	20	9.2
Moderate-income	1,148	6.5	999	6.2	136	9.4	13	6
Middle-income	11,913	66.9	10,866	67.3	899	62.2	148	67.9
Upper-income	3,196	18	2,940	18.2	219	15.1	37	17
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**17,798**	**100.0**	**16,134**	**100.0**	**1,446**	**100.0**	**218**	**100.0**
	Percentage of Total Businesses:			**90.7**		**8.1**		**1.2**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 49620 (YORK-HANOVER, PA)

LENDING TEST

M&T's performance under the lending test in MSA 49620 (York-Hanover, PA) was based on the following summary. The bank's lending levels reflected adequate responsiveness to assessment area credit needs, the geographic distribution of loans reflected good penetration throughout the bank's assessment area, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made a relatively high level of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to credit needs in MSA 49620 (York-Hanover, PA). The conclusion is based on lending activity levels, market share performance and comparison with aggregate market data. Performance in HMDA was considered adequate, while small business-related lending was considered good. For the five-year evaluation period, lending activity totaled 3,735 loans consisting of 847 home purchase, 889 refinance, 438 home improvement and 1,561 small business loans. Total HMDA and small business volume for the evaluation period decreased 15.2% on an annualized basis compared to the previous evaluation period. Lending activity during the prior period totaled 1,762 loans, consisting of 455 home purchase, 695 refinance, 142 home improvement, and 470 small business loans. This annualized

decrease was driven primarily by annualized decreases in home purchase (-26.4%) and refinance (-49.2%) lending. Home improvement (23.4%) and small business (32.9%) loan volumes increased on an annualized basis. Analysis of the aggregate lending data for the evaluation period indicated a decrease in aggregate lending volume over the evaluation period.

Deposit market share was stable over the review period. In 2018, M&T had a deposit market share of 25.1%, and lending market shares of 1.4% in home purchase lending, 9.9% in refinance, 10.8% in home improvement and 7.1% in small business lending. In comparison, the deposit market share in 2014 was 25.4%, with lending market share of 3.6% in home purchase lending, 2.9% in refinance lending, 9.0% in home improvement lending, and 5.1% in small business lending.

Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration in the MSA 49620 (York-Hanover, PA) assessment area. Lending penetration in LMI census tracts was adequate for home purchase loans and refinance lending and good for home improvement lending and small business.

Analysis of Lending Gaps

The overall penetration of census tracts of different income levels in 2018 was 98.9% of all census tracts in the assessment area when considering HMDA and small business lending. Penetration in low-income census tracts in 2018 was 92.3% for HMDA and small business lending. In 2018, the bank penetrated 100.0% of moderate-income census tracts when evaluating HMDA and small business lending. Overall penetration of different income levels in 2014-2017 for HMDA and small business lending was comparable, as the bank penetrated 95.6% of all census tracts in 2017, 95.6% in 2016, 97.8% in 2015 and 96.7% in 2014.

MSA 49620 (York-Hanover, PA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	13	1	92.3%
Moderate	7	0	100.0%
Middle	55	0	100.0%
Upper	15	0	100.0%
Unknown	0	0	NA
Total Tracts	90	1	98.9%
2017			
Low	13	2	84.6%

Moderate	7	0	100.0%
Middle	55	1	98.2%
Upper	15	1	93.3%
Unknown	0	0	NA
Total Tracts	90	4	95.6%
2016			
Low	11	2	81.8%
Moderate	9	0	100.0%
Middle	53	1	98.1%
Upper	17	1	94.1%
Unknown	0	0	NA
Total Tracts	90	4	95.6%
2015			
Low	11	1	90.9%
Moderate	9	0	100.0%
Middle	53	1	98.1%
Upper	17	0	100.0%
Unknown	0	0	NA
Total Tracts	90	2	97.8%
2014			
Low	11	2	81.8%
Moderate	9	1	88.9%
Middle	53	0	100.0%
Upper	17	0	100.0%
Unknown	0	0	NA
Total Tracts	90	3	96.7%

Home Purchase

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 3.3% by number and 1.7% by dollar volume of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts was comparable to the 3.3% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 2.4% by number and 1.0% by dollar amount volume in low-income census tracts. In 2018, the bank made 3.3% by number and 2.0% by dollar volume of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts was below the 6.2% of owner-occupied housing units

located in moderate-income census tracts and was below the aggregate, which made 6.8% by number and 4.3% by dollar amount volume in moderate-income census tracts.

The bank's home purchase lending from 2014-2017 was below 2018 performance in low-income census tracts and comparable to 2018 performance in moderate-income tracts. Home purchase lending in 2014-2017 in low-income census tracts was below 2018 performance, as in 2014 and 2015 the bank's home purchase lending in low-income census tracts was below the demographic but exceeded the aggregate. In 2016, the bank's home purchase lending in low-income census tracts exceeded the demographic and the aggregate. In 2017, the bank did not have a home purchase loan in a low-income census tract. In 2014-2017 home purchase performance in moderate-income tracts was comparable to 2018 performance. In 2014, 2015 and 2017, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate. In 2016, the bank's home purchase lending in moderate-income census tracts exceeded the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans throughout the assessment area reflected adequate penetration. In 2018, the bank made 1.5% by number and 1.1% by dollar volume of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was below the 3.3% of owner-occupied housing units located in low-income census tracts and was below the aggregate, which made 2.0% by number and 1.3% by dollar amount in low-income census tracts. In 2018, M&T made 4.9% by number and 3.7% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number, was below the 6.2% of owner-occupied housing units located in moderate-income census tracts but was comparable to the aggregate, which made 4.5% by number and 3.2% by dollar amount volume in moderate-income census tracts.

M&T's performance in 2014-2017 was consistent with performance in 2018. In 2014 and 2015, the bank's refinance lending in low-income census tracts was below the demographic and exceeded the aggregate. In 2016, the bank's refinance lending in low-income census tracts exceeded the demographic and the aggregate. In 2017, the bank's refinance lending in low-income census tracts was below the demographic and the aggregate. In moderate-income tracts the bank's performance in 2014-2017 was also consistent with 2018 performance. In 2014, refinance lending in moderate-income tracts exceeded the demographic and the aggregate. In 2015, refinance lending was below the demographic but exceeded the aggregate. The bank's refinance lending in moderate-income census tracts in 2016 was below both the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2017 was below the demographic and comparable to the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made 0.8% by number and 0.3% by dollar volume of home improvement loans in low-income census tracts. The bank's home improvement lending in low-income census tracts, by number, was below the 3.3% of owner-occupied housing units located in low-income census tracts and also was below the aggregate, which made 1.2% by number and 0.6% by dollar amount volume in low-income census tracts. In 2018, the bank made 7.8% by number and 9.0% by dollar volume of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts, by number, exceeded the 6.2% of owner-occupied housing units located in moderate-income census tracts and also exceeded the aggregate, which made 5.3% by number and 5.0% by dollar amount volume in moderate-income census tracts.

Home improvement lending in 2014-2017 was consistent with 2018's performance. In 2014 and 2015, the bank's home improvement lending in low-income census tracts was below the demographic and the aggregate. In 2016 and 2017, the bank's home improvement lending in low-income census tracts exceeded the demographic and the aggregate. In moderate-income tracts, the bank's home improvement lending in 2014, 2015 and 2017 exceeded the demographic and the aggregate, while in 2016, lending was below the demographic and comparable to the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration. In 2018, the bank made 7.8% by number and 10.2% by dollar volume of small business loans in low-income census tracts. M&T's small business lending in low-income census tracts was below the demographic of the assessment area, where 8.7% of businesses were located in low-income census tracts. However, performance exceeded the aggregate, which made 7.2% by number and 9.2% by dollar amount in low-income census tracts. In 2018, the bank made 6.8% by number and 3.5% by dollar of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income census tracts, by number, exceeded the demographic of the assessment area where 6.5% of businesses were in moderate-income census tracts. M&T's small business lending in moderate-income census tracts, by number, was comparable to the aggregate, which made 6.1% of small business loans in moderate-income census tracts and below the aggregate, at 4.3% by dollar.

M&T's small business lending in 2014-2017 exceeded 2018 performance. In low-income census tracts, the bank's small business lending for 2014, 2015 and 2017 exceeded the demographic and the aggregate. In 2016, performance was below the demographic but comparable to the aggregate. The bank's small business lending in moderate-income census tracts exceeded 2018 performance, as small business lending in 2014, 2015 and 2016 exceeded both the demographic and the

aggregate. The bank's small business lending in moderate-income census tracts in 2017 was below the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 49620 (York-Hanover, PA) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was good, while the bank's lending to small businesses was also good.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. In 2018, the bank made 9.9% by number and 4.9% by dollar of home purchase loans to low-income borrowers. Performance was comparable to the aggregate lending data, at 7.7% by number and 4.2% by dollar, while performance was below the demographic figure of 19.4% of low-income families in the assessment area. The bank's lending to moderate-income borrowers, at 30.6% by number and 20.7% by dollar, exceeded both the aggregate lending data, at 22.5% by number and 17.4% by dollar and also exceeded the demographic figure of 18.4% of moderate-income families in the assessment area.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. In 2014, 2015 and 2017, lending to low-income borrowers was comparable to the aggregate data lending but was below the demographic figure. In 2016, performance exceeded the aggregate lending data and was comparable to the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with 2018 performance, as the bank's lending was comparable the aggregate lending data and consistent with the demographic figure in each year.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers was 12.1% by number and 7.1% by dollar. Performance was comparable to aggregate lending data, at 11.0% by number and 6.7% by dollar, but was below the demographic figure, at 19.4%. The bank's lending to moderate-income borrowers, at 22.9% by number and 19.1% by dollar volume, was slightly above both the aggregate lending data at 19.7% by number and 15.7% by dollar, and the demographic figure of 18.4%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers was significantly below the demographic

figure in each year. Additionally, in 2014, lending was significantly below the aggregate performance; however, lending was comparable to the aggregate in 2015, 2016 and 2017. The bank's lending to moderate-income borrowers in 2014-2017 was also consistent with 2018 performance. The bank's lending was above both the aggregate lending data and the demographic figure in 2015, 2016 and 2017. In 2014, performance was comparable to the aggregate lending data and demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers was 11.7% by number and 7.8% by dollar. Performance was above aggregate lending data of 7.3% by number and 5.2% by dollar; however, performance was below the demographic figure, at 19.4%. The bank's lending to moderate-income borrowers, at 21.1% by number and 19.3% by dollar, was above the aggregate lending data, at 17.0% by number and 13.2% by dollar, and was comparable to the demographic figure, at 18.4%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending and was comparable to the demographic figure in 2014, 2016, and 2017. In 2015, performance was above the demographic figure and aggregate lending data. The bank's lending to moderate-income borrowers in 2015-2017 also exceeded the 2018 performance, as the bank's lending was above both the aggregate lending data and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes. In 2018, the bank originated 59.5% of loans by number and 24.2% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data, at 48.0% by number and 36.6% by dollar, although lending was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 90.7%. While the bank's loan volume was significantly below the demographic figure, the bank originated 70.6% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. The bank's lending to small businesses exceeded aggregate lending, while falling significantly below the demographic figure, except for lending in 2017, which also fell below aggregate lending.

Community Development Lending

M&T made a relatively high level of community development loans in MSA 49620 (York-Hanover, PA) with 18 loan originations totaling $41.3 million. M&T ranked 2nd out of six similarly-situated banks when comparing annualized community development loans to deposits within MSA 49620 (York-Hanover, PA).

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	1	792
Community Services	14	35,734
Economic Development	2	2,155
Revitalize and Stabilize	1	2,633
Total	**18**	**$41,314**

The vast majority of the bank's community development activity, 86.5%, was directed toward community services.

Community development loan activity included:

- Two loans totaling $600,000 to an organization offering social services to at-risk individuals in a low-income tract.
- A $7.0 million loan for the renovations of a healthcare facility that provides services primarily to LMI individuals eligible for Medicaid.

INVESTMENT TEST

M&T's performance in MSA 49620 (York-Hanover, PA) is based on the following summary. M&T made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, and occasionally in a leadership position. The bank made occasional use of innovative or complex investments to support community development activities and exhibited good responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 14 qualified investments totaling $7.5 million, in the MSA 49620 (York-Hanover, PA). Investments consisted of $6.9 million during the current period and $622 thousand outstanding from the prior period. When compared to six similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked fourth.

Qualified Community Development Investments by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 49620 (York-Hanover, PA) - New	7	6,857	0	0	0	0	0	0	7	6,857

MSA 49620 (York-Hanover, PA) – Prior Period	7	622	0	0	0	0	0	0	7	622
Total	14	7,479	0	0	0	0	0	0	14	7,479

The following are examples of qualified investments that met critical needs in the assessment area:

- Five mortgage backed securities, totaling $2.0 million.
- A $4.5 million investment in LIHTC used for renovations to 75 townhome units. All 75 units are reserved for individuals with incomes at or below 60% AMI.
- A $322,839 investment in an LIHTC fund that will finance the acquisition and rehabilitation of 208 units of affordable housing reserved for LMI individuals.

In addition to qualified investments, the bank made grants or donations totaling $2,340,105 to 159 organizations in the assessment area during the evaluation period. The grants and donations were comprised mostly of funds for community services.

Qualified Community Development Donations by Purpose **October 1, 2014 – December 31, 2019**										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 49620 (York-Hanover, PA)	2	15,000	148	2,087,505	4	67,000	5	170,600	159	2,340,105

SERVICE TEST

M&T's performance under the service test in MSA 49620 (York-Hanover, PA) is based on a relatively high level of community development services. M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in the assessment area, changes in branch locations did not adversely affect the accessibility of the bank's delivery systems particularly to LMI geographies and/or LMI individuals. However, the bank's services varied in a way that inconvenienced the assessment area particularly LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated 25 branches in this assessment area, of which four (16.0%) were in low-income areas and one (4.0%) was in a moderate-income tract. This compares favorably to the 14.4% of the population resided in low- and moderate-income census tracts.

Alternative delivery systems did not enhance M&T's performance in the assessment area. M&T had 60 off-site ATM locations in the assessment area with one (2.0%) located in a low-income area and two (3.0%) in moderate-income areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in MSA 49620 (York-Hanover, PA).

The bank's hours and services varied in a way that inconvenienced its assessment area, particularly LMI geographies and/or individuals. Of the 25 branches in the assessment area, 20, or 80.0%, had early morning, late evening, or Saturday hours. Of the five branches in LMI census tracts, only one had extended or Saturday hours.

Community Development Services

M&T provided a relatively high level of community development services in the MSA 49620 (York-Hanover, PA). The table shows the number and type of services the bank provided during the evaluation period. The bank's management and staff served on the board of directors for 50 nonprofit and community-based organizations in this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	216
Technical Assistance	2
Small Business Seminars	0
Board Participation	50
Total	**268**

METROPOLITAN AREA

(FULL REVIEW)

MSA 25420 (HARRISBURG-CARLISLE, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 25420 (HARRISBURG-CARLISLE, PA)

As of December 31, 2018, M&T maintained 20 branches in MSA 25420 (Harrisburg-Carlisle, PA), or 14.7% of all its retail branches in Pennsylvania. Based on deposit data reported to the FDIC as of June 30, 2018, these branches contained $1.8 billion in deposits, or 20.8% of M&T's total branch deposits in the state. M&T also was ranked 2nd in deposit market share in the MSA, controlling 12.7% of the retail deposit market. Lending in this assessment area accounted for 11.3% of the total lending in M&T's assessment areas located in the State of Pennsylvania.

MSA 25420 (Harrisburg-Carlisle, PA) is a highly competitive marketplace where many large banks compete with numerous community banks, savings and loan associations, credit unions, and nonbank financial institutions. M&T's primary competitors in the MSA are PNC Bank N.A., Wells Fargo Bank N.A., Fulton Bank N.A., Branch Banking and Trust Company, First National Bank of Pennsylvania, and Orrstown Bank.

Community Contacts

To ascertain the credit needs of the area, a community contact was conducted with a private nonprofit development corporation whose mission is to serve as a catalyst for economic, community and workforce development. The contact noted that a limited number of banks service the area, but participation by the area's local financial institutions is good. The contact also noted that smaller banks are more aggressive in meeting the needs of the community, especially providing small dollar loans. The contact indicated that generally all banks are involved in the community by volunteering at local functions and events. The contact also noted that businesses both large and small are having difficulty attracting new employees and that several businesses are working with the local junior college's workforce development programs to fill the gap.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area consisted of Cumberland and Dauphin counties which were a portion of MSA 25420 (Harrisburg-Carlisle, PA). Located in south central Pennsylvania, the core of the assessment area is the state capital of Harrisburg in Dauphin County. According to the 2015 ACS, in 2018 MSA 25420's population totaled 512,521. The MSA contained 12.6% of the bank's State of Pennsylvania State assessment area population. Of the 114 census tracts in the assessment area, 11 or 9.6%, were low-income, 26 or 22.8% were moderate-income, 52 or 45.6 were middle-income, 23 or 20.2% were upper-income and 2 or 1.8% were of unknown income

Income Characteristics

In 2018, the MSA 25420 (Harrisburg-Carlisle, PA) assessment area had 131,488 families, of which 19.8% (7.6% of which were below the poverty level) were considered low-income and 18.0% were moderate-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$70,054	$72,109
Cumberland County	$75,000	$77,749
Dauphin County	$66,023	$67,756
MSA 25420 (Harrisburg-Carlisle, PA)	$69,389	$71.723
State of Pennsylvania	$63,364	$68,158

Housing Characteristics

The 2015 ACS showed that MSA 25420 (Harrisburg Carlisle, PA) had 223,592 housing units, of which 61.5% were owner-occupied and 30.5% are rental units. Of the available owner-occupied units, 15.8% were located in LMI areas. In low-income census tracts, 55.8% of the housing units were rental units, 19.5% were vacant, and 24.7% were owner-occupied. In moderate-income census tracts, 57.8% of the housing units were either rental or vacant, and 42.2% were owner-occupied.

The median age of the housing stock in the assessment area was 50 years old, with 25.8% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans.

The median housing value in the assessment area was $171,898, with an affordability ratio of 33.6. The median gross rent in the assessment area was $863 per month. Within the assessment area, 43.9% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$163,717	34.0	$171,898	33.6	$762	$863	13.3%
Cumberland County	$174,600	34.5	$188,400	32.8	$757	$886	17.0%
Dauphin County	$153,100	34.2	$159,200	33.8	$765	$847	10.7%
MSA 25420 (Harrisburg-Carlisle, PA)	$161,907	34.2	$170,729	33.6	$754	$856	13.5%
State of Pennsylvania	$159,300	31.6	$166,000	32.3	$739	$840	13.7%

Labor, Employment and Economic Characteristics

Trade, transportation, and utilities were the largest employment sectors in the MSA, with roughly 64,500 employees, while the state government was the second largest employment sector with approximately 60,000 employees. The largest employers in MSA 25420 (Harrisburg-Carlisle, PA) were: Giant Food Stores, Penn State Hershey Medical Center, Hershey Entertainment & Resorts, The Hershey Company, Wal-Mart Stores, Inc., JFC Staffing Associates, Highmark Blue Cross Blue Shield and Pinnacle Healthy Systems. Some areas in the MSA, including parts of downtown Harrisburg, were in Keystone Opportunity Zones; businesses located in these areas (designated by the Commonwealth of Pennsylvania) qualify for tax incentives. According to D&B data, the assessment area had a total of 24,432 businesses in 2018 of which 21,889 (89.6%) were small businesses with GAR of $1 million or less.

Employment declined over the review period, indicating weaker economic conditions. Unemployment is higher in Dauphin County, compared to Cumberland County, primarily due to high unemployment in the City of Harrisburg.

The table below shows the trends in the unemployment rate over the review period.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 25420 (Harrisburg-Carlisle, PA)	3.6	4.1	4.4	4.3	5.0
Cumberland County	3.3	3.8	4.1	4.0	4.5
Dauphin County	4.0	4.5	4.8	4.6	5.3
State of Pennsylvania	5.9	5.3	5.4	4.9	4.2

Additional performance context data for this assessment area is provided in the subsequent table with MSA 25420 (Harrisburg-Carlisle, PA) Assessment Area Demographics.

Assessment Area Demographics

Assessment Area : MSA 25420 Harrisburg-Carlisle, PA - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	9.6	7,137	5.4	2,432	34.1	25,972	19.8
Moderate-income	26	22.8	19,833	15.1	2,664	13.4	23,680	18
Middle-income	52	45.6	69,162	52.6	3,994	5.8	28,484	21.7
Upper-income	23	20.2	35,344	26.9	922	2.6	53,352	40.6
Unknown-income	2	1.8	12	0	0	0	0	0
Total Assessment Area	**114**	**100.0**	**131,488**	**100.0**	**10,012**	**7.6**	**131,488**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	16,411	4,056	3	24.7	9,154	55.8	3,201	19.5
Moderate-income	41,791	17,645	12.8	42.2	18,966	45.4	5,180	12.4
Middle-income	113,565	75,320	54.8	66.3	30,628	27	7,617	6.7
Upper-income	51,813	40,375	29.4	77.9	9,417	18.2	2,021	3.9
Unknown-income	12	3	0	25	9	75	0	0
Total Assessment Area	**223,592**	**137,399**	**100.0**	**61.5**	**68,174**	**30.5**	**18,019**	**8.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,327	5.4	1,182	5.4	129	6	16	4.1
Moderate-income	4,418	18.1	3,786	17.3	466	21.7	166	42.2
Middle-income	12,835	52.5	11,499	52.5	1,168	54.3	168	42.7
Upper-income	5,846	23.9	5,417	24.7	386	18	43	10.9
Unknown-income	6	0	5	0	1	0	0	0
Total Assessment Area	**24,432**	**100.0**	**21,889**	**100.0**	**2,150**	**100.0**	**393**	**100.0**
	Percentage of Total Businesses:			**89.6**		**8.8**		**1.6**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 25420 (HARRISBURG-CARLISLE, PA)

LENDING TEST

M&T's performance under the lending test in MSA 25420 (Harrisburg-Carlisle, PA) is based on the following summary. The bank's lending levels reflected adequate responsiveness to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made a relatively high level of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MSA 25420 (Harrisburg-Carlisle, PA). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA was considered adequate and small business-related lending was considered good. For the five-year evaluation period, lending activity totaled 2,013 loans consisting of 336 home purchase, 367 refinance, 235 home improvement and 1,075 small business loans. Lending activity declined on an annualized basis compared to the prior two-year period, during which lending activity totaled 1,118 loans consisting of 220 home purchase, 407 refinance, 98 home improvement, and 393 small business loans. HMDA and small business volume for the evaluation period declined 28.0% on an annualized basis overall compared to the previous evaluation period. This was driven by annualized decreases in home purchase (-38.9%), refinance (-63.9%), and home improvement (-4.1) lending. Small business lending volume increased (9.4%) on an annualized basis. Analysis of the aggregate lending for the evaluation period indicated an overall annualized decrease in lending volume for the aggregate.

M&T's market share of deposits in the assessment area declined while lending market share was generally stable. In 2018, M&T had a deposit market share of 12.7%, and lending market shares of 0.6% in home purchase lending, 4.9% in refinance, 3.0% in home improvement and 3.3% in small business lending. In comparison, the deposit market share in 2014 was 17.3%, with lending market shares of 1.1% in home purchase lending, 0.8% in refinance lending, 2.9% in home improvement lending, and 3.1% in small business lending.

Geographic Distribution of Loans

M&T's overall geographic distribution of HMDA-related and small business loans reflected overall good penetration in the MSA 25420 (Harrisburg-Carlisle, PA) assessment area. Lending penetration in LMI census tracts was good for home purchase, home improvement, and small business lending. Lending penetration in LMI census tracts for refinance lending was adequate.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 87.7% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, the bank penetrated 63.6% of low-income census tracts and 76.9% of moderate-income census tracts for HMDA and small business lending. Overall, penetration of different income levels in 2014-2017 for HMDA and small business lending was comparable, as the bank penetrated 82.5% of all census tracts in 2017, 88.6% in 2016, 86.0% in 2015 and 86.8% in 2014.

MSA 25420 (Harrisburg-Carlisle, PA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			

Low	11	4	63.6%
Moderate	26	6	76.9%
Middle	52	2	96.2%
Upper	23	0	100.0%
Unknown	2	2	0.0%
Total Tracts	114	14	87.7%
2017			
Low	11	3	72.7%
Moderate	26	4	84.6%
Middle	52	8	84.6%
Upper	23	3	87.0%
Unknown	2	2	0.0%
Total Tracts	114	20	82.5%
2016			
Low	7	2	71.4%
Moderate	28	6	78.6%
Middle	52	2	96.2%
Upper	26	2	92.3%
Unknown	1	1	0.0%
Total Tracts	114	13	88.6%
2015			
Low	7	2	71.4%
Moderate	28	3	89.3%
Middle	52	8	84.6%
Upper	26	2	92.3%
Unknown	1	1	0.0%
Total Tracts	114	16	86.0%
2014			
Low	7	3	57.1%
Moderate	28	5	82.1%
Middle	52	4	92.3%
Upper	26	2	92.3%
Unknown	1	1	0.0%
Total Tracts	114	15	86.8%

Home Purchase

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area. In 2018, the bank made 1.7% by number and 0.9% by dollar volume of home purchase loans in low-income census tracts. Home purchase lending in low-income census tracts

was below the 3.0% of owner-occupied housing units located in low-income census tracts and was below the aggregate, which made 2.7% by number and 1.5% by dollar in low-income census tracts. However, in 2018, the bank made 15.0% by number and 10.3% by dollar of home purchase loans in moderate-income census tracts, exceeding the 12.8% of owner-occupied housing units located in moderate-income census tracts and also exceeding the aggregate, which made 13.4% by number and 8.3% by dollar in moderate-income census tracts.

M&T's home purchase lending in 2014-2017 was consistent with 2018 performance. In low-income census tracts in 2014 and 2016, the bank's home purchase lending was below the demographic and exceeded the aggregate. In 2015, home purchase lending exceeded the demographic and the aggregate. In 2017, the bank did not make any home purchase lending in low-income census tracts. In 2014-2017, the bank's home purchase lending in moderate-income census tracts was consistent with 2018 performance, exceeding both the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected good penetration throughout the assessment area. In 2018, the bank made 1.5% by number and 1.2% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts was below the demographic figure of 3.0% of owner-occupied housing units located in low-income census tracts. M&T's refinance lending performance was also was below the aggregate, which made 2.1% by number in low-income census tracts. M&T's refinance lending in low-income census tracts by dollar was comparable to the aggregate, which made 1.2% by dollar in low-income census tracts. In 2018, the bank made 10.8% by number and 7.3% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number, was below the 12.8% of owner-occupied housing units located in moderate-income census tracts but exceeded the aggregate, which made 9.6% by number and 6.0% by dollar in moderate-income census tracts.

In 2014-2017, refinance lending performance was consistent with 2018 performance. In 2014, the bank's refinance lending in low-income census tracts exceeded the demographic and the aggregate. In 2015 and 2016, the bank did not make any refinance loans in low-income census tracts. In 2017, the bank's refinance lending in low-income census tracts was below the demographic yet exceeded the aggregate. The bank's refinance lending in moderate-income census tracts in 2014 and 2017 exceeded both the demographic and the aggregate. The bank's refinance lending in moderate-income tracts in 2015 was below the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2016 was below the demographic and comparable to the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration over the entirety of the evaluation period. In 2018, the bank did not make any home improvement loans in low-income census tracts, while 3.0% of owner-occupied housing units are in low-income census tracts. However, the aggregate made less than 1.0% of its home improvement loans in low-income census tracts, as well. In 2018, the bank made 4.2% by number and 1.9% by dollar of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts, by number, was below the 12.8% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 7.7% by number and 5.2% by dollar in moderate-income census tracts.

M&T's home improvement performance in 2014–2017 exceeded 2018 performance. In 2014, the bank did not make any home improvement loans in low-income census tracts while in 2015 and 2017, lending exceeded the demographic and the aggregate. In 2016, the bank's home improvement lending in low-income census tracts was below the demographic but exceeded the aggregate. In moderate-income census tracts in 2014-2017, home improvement performance exceeded the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018, the bank made 6.0% of its small business loans by number in low-income census tracts, exceeding the demographic of the assessment area where 5.4% of businesses were in low-income census tracts. M&T's small business lending also exceeded the aggregate, which made 4.3% by number in low-income census tracts. M&T's small business lending in low-income census tracts by dollar at 3.0%, was below the aggregate, which made 4.6% by dollar in low-income census tracts in 2018. M&T's small business lending in moderate-income tracts was good in 2018, as the bank made 15.9% by number and 16.8% by dollar of small business loans in moderate-income census tracts. Performance was below the demographic of the assessment area where 18.1% of businesses were in moderate-income census tracts but was comparable to the aggregate, which made 16.2% by number in moderate-income census tracts. M&T's small business lending in moderate-income census tracts by dollar exceeded the aggregate, which made 13.9% by dollar in moderate-income census tracts.

Small business lending performance in 2014-2017 was consistent overall with 2018's performance. In low-income census tracts in 2014, small business lending was below the demographic and the aggregate, while in 2015 and 2017 it was below the demographic but comparable to the aggregate. In 2016, the bank's small business lending in low-income census tracts exceeded the demographic and the aggregate. In moderate-income census tracts, the bank's small business lending in 2014 and 2015 was below the demographic but was comparable to the

aggregate. In 2016 and 2017, the bank's small business lending in moderate-income census tracts exceeded the demographic and the aggregate.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 25420 (Harrisburg-Carlisle, PA) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of $1 million or less was good.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers was 11.7% by number and 6.5% by dollar. Performance was comparable to the aggregate lending data, at 9.0% by number and 5.3% by dollar, and below the demographic figure, at 19.8%. The bank's lending to moderate-income borrowers, at 28.3% by number and 24.1% by dollar, slightly exceeded the aggregate lending data, at 24.5% by number and 18.9% by dollar, and exceeded the demographic figure, at 18.0%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers in 2014 was slightly below the aggregate data lending and below the demographic figure. In 2015 and 2016, performance exceeded aggregate data but was below the demographic figure. Performance in 2017 was below the aggregate data and the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was below 2018 performance. The bank's lending was below the aggregate lending data, except for 2017, which exceeded the aggregate data. In 2014 and 2015, the bank's lending to moderate-income borrowers was comparable to the demographic. In 2016, performance to moderate-income borrowers was below the demographic, while in 2017 performance was above the demographic.

Refinance

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 17.9% by number and 11.2% by dollar, exceeded the aggregate lending data, at 10.7% by number and 6.8% by dollar, while lending performance was comparable to the demographic figure, at 19.8%. The bank's lending to moderate-income borrowers, at 29.7% by number and 24.1% by dollar, exceeded the aggregate lending data, at 20.7% by number and 15.6% by dollar, and the demographic figure at 18.0%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. Lending to low-income borrowers in 2017 was comparable to the aggregate data lending, while lending in 2014, 2015 and 2016 was below the aggregate. The bank's lending for all years was below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was slightly below the 2018 performance. The bank's lending in 2016 and 2017 was consistent with the aggregate lending data, but below the demographic. In 2015, lending exceeded both the demographic and aggregate and, in 2014, lending was below the demographic and aggregate.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 16.7% by number and 11.8% by dollar, exceeded aggregate lending data, at 7.1% by number and 5.4% by dollar, while it fell slightly below the demographic figure, at 19.8%. The bank's lending to moderate-income borrowers, at 12.5% by number and 10.4% by dollar, was below the aggregate lending data, at 18.3% by number and 16.3% by dollar and the demographic figure, at 18.0%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers significantly exceeded the aggregate data lending and exceeded the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was also above the 2018 performance. The bank's lending was above the aggregate lending data, and the demographic figure for 2014, 2015 and 2017, while in 2016, lending was below the demographic and comparable to the aggregate.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes for small business loans. In 2018, the bank originated 59.5% of loans by number and 32.2% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data, at 45.2% by number and was comparable to aggregate lending data by dollar at 34.5%. Performance was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 89.6%. While the bank's loan volume was significantly below the demographic figure, the bank originated 67.9% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was below 2018 lending. While lending in 2016 exceeded aggregate lending and significantly fell below the demographic figure, the bank's lending in 2014, 2015 and 2017 to small businesses was comparable to aggregate lending but significantly below the demographic figure.

COMMUNITY DEVELOPMENT LENDING

M&T made a relatively high level of community development loans in MSA 25420 (Harrisburg-Carlisle, PA). M&T made 15 community development loans, totaling $84.4 million. M&T ranked 3rd compared to six similarly-situated banks when comparing annualized community development loans to deposits within MSA 25420 (Harrisburg-Carlisle, PA).

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	1	1,480
Community Services	8	70,050
Economic Development	2	3,776
Revitalize and Stabilize	4	9,100
Total	**15**	**$84,406**

According to dollar volume, community services initiatives represented 83.0% of total community development lending and revitalization and stabilization initiatives constituted 10.8%.

Community development lending activity included:

- Three loans totaling $43.0 million to an organization that provided social services for low- and moderate-income youth, as well as adoption services across the state of Pennsylvania.
- A $2.0 million loan that supported the revitalization of an arts and education center in a Pennsylvania Enterprise Zone, which is a state designation related to an area that is financially and physical distressed.

INVESTMENT TEST

M&T's performance in MSA 25420 (Harrisburg-Carlisle, PA) is based on the following summary. The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, and occasionally in a leadership position. The bank made significant use of innovative or complex investments to support community development initiatives and exhibited good responsiveness to credit and community development needs.

During the evaluation period, the bank made 20 qualified investments totaling $25.0 million, in MSA 25420 (Harrisburg-Carlisle, PA). Investments consisted of $23.0 million during the current period and $2.0 million outstanding from the prior period. When compared to six similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked fourth.

By number, fewer investments were made during this evaluation period compared to the last evaluation period; however, by dollar, the investment activity represented a significant increase on an annualized basis when compared to the $5.5 million of investments made at the previous evaluation.

Qualified Community Development Investments by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 25420 (Harrisburg-Carlisle, PA) – New	2	22,976	0	0	0	0	0	0	2	22,976
MSA 25420 (Harrisburg-Carlisle, PA) - Prior Period	18	1,971	0	0	0	0	0	0	18	1,971
Total	20	24,947	0	0	0	0	0	0	20	24,971

The following are examples of qualified investments that met critical needs in the assessment area:

- An $11.5 million investment in an LIHTC fund for 43 units of affordable housing. Three units are reserved for tenants earning up to 20% of AMI, 22 units are reserved for tenants earning up to 50% of AMI, and 18 units are reserved for tenants earning up to 60% of AMI.

- An $11.5 million investment in a LIHTC fund that supports the construction of 35 single-family detached homes for LMI individuals. Of the 35 detached homes two units are reserved for individuals earning 20% or less of AMI; 16 units at 15% or less of AMI; and 17 units at 60% or less of AMI.

In addition to qualified investments, the bank made grants or donations totaling $2.5 million to 289 organizations in the assessment area during the evaluation period. The grants and donations were mainly comprised of funds for community services.

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 25420 (Harrisburg-Carlisle, PA)	18	95,000	257	2,209,889	8	139,500	6	75,000	289	2,519,389

SERVICE TEST

M&T's performance under the service test in MSA 25420 (Harrisburg-Carlisle, PA) was based on a relatively high level of community development services. M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in the assessment

area. M&T's record of opening and closing of branches generally did not adversely affect the accessibility of delivery systems particularly to LMI geographies and/or LMI individuals, and services did not vary in a way that inconvenienced its assessment area particularly LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in this assessment area. M&T operated 20 branches in this assessment area, of which two (10%) were in low-income areas and four (20%) were in moderate-income areas. This compares favorably to the 6.5% and 17.2% of the MSA's population residing in low- and moderate-income areas, respectively.

Alternative delivery systems enhanced the bank's performance in MSA 25420 (Harrisburg-Carlisle, PA). M&T had 33 off-site ATM locations (18 M&T and 15 branded) in the assessment area, with one (3.0%) located in a low-income area and 10 (30.0%) in moderate-income areas.

M&T's record of opening and closing branches generally did not adversely affect the accessibility of its delivery systems particularly to LMI geographies and/or LMI individuals. During the evaluation period, M&T closed one branch in MSA 25420 (Harrisburg-Carlisle, PA), which was in a low-income census tract.

The bank's hours and services did not vary in a way that inconvenienced its assessment area, including LMI geographies and/or LMI individuals. Of the 20 branches in the MSA, three, or 15.0%, had evening hours and 15, or 75.0% had Saturday hours. Of the six branches in LMI census tracts, two or 33.0%, had extended hours and three or 50.0% had Saturday hours.

Community Development Services

M&T provided a relatively high level of community services in the MSA 25420 (Harrisburg-Carlisle, PA). As shown in the table, M&T provided 243 services in the assessment area, which were primarily focused on financial education seminars. In addition, management and staff served as directors, advisors, or committee members to 97 nonprofit and community-based organizations in MSA 25420 (Harrisburg-Carlisle, PA).

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	145
Technical Assistance	0
Small Business Seminars	1
Board Participation	97
Total	**243**

METROPOLITAN AREA
(FULL REVIEW)

MSA 42540 (SCRANTON-WILKES-BARRE-HAZLETON, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 42540 (SCRANTON-WILKES-BARRE-HAZLETON, PA)

Located in northeastern Pennsylvania, MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) was made up of Lackawanna, Luzerne, and Wyoming Counties. The assessment area is a highly competitive marketplace where large regional banks compete with numerous community banks, savings and loan associations, credit unions, and nonbank financial institutions. M&T's primary competitors are PNC Bank N.A., Wells Fargo Bank N.A., Peoples Security Bank and Trust Co., FNCB Bank, and Community Bank, N.A.

As of December 31, 2018, M&T maintained 11 branches in the MSA, which was 8.1% of the bank's retail branches in the State of Pennsylvania. According to the FDIC, as of June 30, 2018, M&T ranks 3rd in MSA 42540 (Scranton-Wilkes-Barre-Hazelton, PA) with 8.2% of the retail deposit market share. There were 22 depository institutions operating in the assessment area that maintain 206 banking offices, with $12.7 billion in deposits. M&T's branches hold approximately $1.0 billion in MSA 42540 (Scranton-Wilkes-Barre-Hazelton, PA), or 12.4%, of the bank's deposits in Pennsylvania.

Community Contacts

As part of the CRA evaluation process, one community contact was conducted with a private nonprofit regional provider of economic and community development services in seven counties in northeastern Pennsylvania. According to the contact, the area, formerly closely connected with the coal industry, has been struggling to reinvent itself after the decline of coal. It also suffers from an aging population. Healthcare and the wholesale distribution industry seem to be stabilizing the economy now. The contact indicated a need for increased small business lending and said that many banks participate with the non-profit organization in conducting workshops to help entrepreneurs establish a new business or expand an existing business.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) consisted of Lackawanna County, Luzerne County, and Wyoming County, which was the entire MSA. According to the 2015 ACS, MSA 42540's population totaled 561,701. The MSA contained 13.8% of the bank's State of Pennsylvania combined assessment area population.

Of the 170 census tracts in the assessment area, 6 or 3.5%, were low-income, 42 or 24.7% were moderate-income, 87 or 51.2% were middle-income, 33 or 19.4% were upper-income and 2 or 1.2% were of unknown income. Most of the assessment area LMI tracts were in Luzerne County in the cities of Wilkes-Barre, Hazleton, and Pittston, and in areas near Wilkes-Barre.

Income Characteristics

In 2018, the MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) assessment area had 141,530 families, of which 21.3% (11.1% were below the poverty level) were considered low-income and 17.7% were moderate-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
County	**2010**	**2015**
Assessment Area	$56,045	$59,887
Lackawanna County	$57,846	$59,955
Luzerne County	$54,843	$59,622
Wyoming County	$56,957	$61,832
State of Pennsylvania	$63,364	$68,158

Housing Characteristics

In 2018, the 2015 ACS showed that MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) had 258,782 housing units, of which 58.8% were owner-occupied and 28.0% were rental units. Of the available owner-occupied units, 15.8% were in LMI areas. In low-income census tracts, 55.5% of the housing units were rental units, 13.1% vacant, and 31.4% were owner-occupied. In moderate-income census tracts, 58.8% of the housing units were either rental or vacant, and 41.2% were owner-occupied.

The median age of housing stock in the assessment area was 62 years old, with 46.4% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans. The median housing value in the assessment area was $132,992, with an affordability ratio of 34.8. The median gross rent in the assessment area was $706 per month. Within the assessment area, 42.7% of all renters had rental costs that exceeded 30% of their incomes.

Counties	Median Housing Value	Affordability Ratio	Median Housing Value	Affordability Ratio	Median Gross Rent	Median Gross Rent	Percent of Change
Assessment Area	$122,329	35.2	$132,992	34.8	$611	$706	15.7%
Lackawanna County	$137,100	31.9	$144,800	32.0	$623	$709	13.8%
Luzerne County	$113,300	37.3	$122,700	37.4	$599	$702	17.2%
Wyoming County	$140,800	33.7	$159,500	32.0	$624	$736	17.9%
State of Pennsylvania	$159,300	31.6	$166,000	32.3	$739	$840	13.7%

Labor, Employment and Economic Characteristics

Scranton and nearby Wilkes-Barre were centers of government, higher education, health services, retailing and distribution in northeastern Pennsylvania. Strengths of MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA)'s economy included its position as a major distribution hub for the region, a comparatively low cost of living, and the large presence of education and healthcare facilities. In addition, manufacturing employment is showing signs of stabilizing. However, a below average per capita income and a concentration of new jobs in comparatively low-paying industries and occupations limit the area's economic potential.

According to D&B data, the assessment area had a total of 24,641 businesses in 2018, of which 22,185 (90.0%) were small businesses with GAR of $1 million or less.

The table below shows the trends in the unemployment rate over the review period.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 42540 (Scranton-Wilkes Barre-Hazleton, PA)	7.0	6.2	6.0	5.5	5.0
Lackawanna County	6.6	5.8	5.6	5.1	4.5

Luzerne County	7.3	6.4	6.3	5.8	5.4
Wyoming County	6.6	6.1	6.2	5.2	4.5
State of Pennsylvania	5.9	5.3	5.4	4.9	4.2

Additional performance context data for this assessment area is provided in the subsequent MSA 42540 (Scranton-Wilkes Barre-Hazleton, PA) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: MSA 42540 Scranton-Wilkes Barre-Hazleton, PA - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	3.5	4,022	2.8	1,656	41.2	30,212	21.3
Moderate-income	42	24.7	26,168	18.5	5,254	20.1	24,981	17.7
Middle-income	87	51.2	75,804	53.6	7,210	9.5	28,941	20.4
Upper-income	33	19.4	35,437	25	1,510	4.3	57,396	40.6
Unknown-income	2	1.2	99	0.1	22	22.2	0	0
Total Assessment Area	**170**	**100.0**	**141,530**	**100.0**	**15,652**	**11.1**	**141,530**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,893	2,476	1.6	31.4	4,380	55.5	1,037	13.1
Moderate-income	52,571	21,674	14.2	41.2	22,671	43.1	8,226	15.6
Middle-income	141,030	86,057	56.5	61	35,350	25.1	19,623	13.9
Upper-income	56,351	41,926	27.5	74.4	9,339	16.6	5,086	9
Unknown-income	937	51	0	5.4	696	74.3	190	20.3
Total Assessment Area	**258,782**	**152,184**	**100.0**	**58.8**	**72,436**	**28.0**	**34,162**	**13.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	562	2.3	492	2.2	66	3.2	4	1
Moderate-income	4,559	18.5	4,092	18.4	420	20.3	47	12.1
Middle-income	13,077	53.1	11,757	53	1,089	52.7	231	59.5
Upper-income	5,991	24.3	5,485	24.7	405	19.6	101	26
Unknown-income	452	1.8	359	1.6	88	4.3	5	1.3
Total Assessment Area	**24,641**	**100.0**	**22,185**	**100.0**	**2,068**	**100.0**	**388**	**100.0**
	Percentage of Total Businesses:			**90.0**		**8.4**		**1.6**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 42540 (SCRANTON-WILKES-BARRE-HAZLETON, PA)

LENDING TEST

M&T's performance under the lending test in MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) was based on the following summary. The bank's lending levels reflected adequate responsiveness

to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment area, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made an adequate level of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to the assessment area credit needs in MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA was considered adequate while small business-related lending was considered good. For the five-year evaluation period, lending activity totaled 2,098 loans consisting of 514 home purchase, 461 refinance, 309 home improvement and 814 small business loans. Lending activity declined on an annualized basis compared to the prior two-year period, during which lending activity totaled 1,266 loans consisting of 430 home purchase, 411 refinance, 126 home improvement, and 299 small business loans. Total HMDA and small business volume for the evaluation period decreased 33.7% on an annualized basis compared to the previous evaluation period. This annualized decrease was driven primarily by annualized decreases in home purchase (-52.3), refinance (-55.1%) and home improvement (-1.9) lending. The bank had an increase in small business (8.9%) loan volumes. Analysis of the aggregate for the evaluation period indicated an annualized decrease in aggregate lending volume.

M&T's market share of deposits and lending in the assessment area were stable overall. While home purchase lending market share declined, refinance and home improvement increased, and small business market share was stable. In 2018, M&T had a deposit market share of 8.2%, and lending market shares of 0.4% in home purchase lending, 6.3% in refinance, 6.0% in home improvement and 1.9% in small business lending. In comparison, the deposit market share in 2014 was 9.0%, with a lending market share of 3.1% in home purchase lending, 1.6% in refinance lending, 4.6% in home improvement lending, and 1.9% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration in the MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) assessment area. Greater weight was given to the analysis of HMDA lending based on the overall loan volumes in the assessment area.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 72.4% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, the bank penetrated 66.7% of low-income census tracts and 64.3% of moderate-income census tracts when

considering HMDA and small business lending. Overall, penetration of different income levels in 2014-2017 for HMDA and small business lending was generally comparable as the bank penetrated 64.7% of all census tracts in 2017, 70.0% in 2016, 72.4% in 2015 and 77.6% in 2014.

MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	6	2	66.7%
Moderate	42	15	64.3%
Middle	87	25	71.3%
Upper	33	4	87.9%
Unknown	2	1	50.0%
Total Tracts	170	47	72.4%
2017			
Low	6	1	83.3%
Moderate	42	25	40.5%
Middle	87	25	71.3%
Upper	33	8	75.8%
Unknown	2	1	50.0%
Total Tracts	170	60	64.7%
2016			
Low	4	3	25.0%
Moderate	35	15	57.1%
Middle	101	28	72.3%
Upper	29	4	86.2%
Unknown	1	1	0.0%
Total Tracts	170	51	70.0%
2015			
Low	4	1	75.0%
Moderate	35	14	60.0%
Middle	101	25	75.2%
Upper	29	7	75.9%
Unknown	1	0	100.0%
Total Tracts	170	47	72.4%
2014			
Low	4	1	75.0%

Moderate	35	9	74.3%
Middle	101	24	76.2%
Upper	29	4	86.2%
Unknown	1	0	100.0%
Total Tracts	170	38	77.6%

Home Purchase

The geographic distribution of home purchase loans reflected good penetration throughout the assessment area. In 2018, the bank made 2.7% by number and 0.8% by dollar of home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts exceeded the 1.6% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 2.1% by number in low-income census tracts. By dollar amount, home purchase volume was below the aggregate, which made 1.2% by dollar amount volume in low-income census tracts. In 2018, M&T made 10.8% by number and 7.1% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts, by number, was below the 14.2% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 14.9% by number and 10.2% by dollar in moderate-income census tracts.

In 2014-2017, home purchase lending in LMI census tracts exceeded 2018 performance. In 2014, 2015 and 2017, the bank's home purchase lending in low-income census tracts exceeded the demographic and the aggregate. In 2016, the bank did not make any home purchase loans in low-income census tracts. In moderate-income tracts in 2014 and 2017, the bank's home purchase lending was comparable to the demographic and exceeded the aggregate, while in 2015, home purchase lending in moderate-income census tracts was below the demographic and the aggregate. In 2016, the bank's home purchase lending in moderate-income census tracts was below the demographic but comparable to the aggregate, while in 2017, the bank's lending exceeded the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 1.0% by number and 0.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts was below the 1.6% of owner-occupied housing units located in low-income census tracts. M&T's refinance lending in low-income census tracts exceeded the aggregate, which made 0.7% by number and 0.4% by dollar in low-income census tracts. In 2018, the bank made 10.6% by number and 8.4% by dollar of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts was below the 14.2% of owner-occupied housing units located in

moderate-income census tracts but exceeded the aggregate, which made 10.1% by number and 6.7% by dollar volume in moderate-income census tracts.

In 2014-2017, refinance lending was consistent with 2018 performance. In 2014-2017, the bank's refinance lending in low-income census tracts was less favorable than 2018 performance as the bank did not make any refinance loans in low-income census tracts. The bank's refinance lending in moderate-income census tracts in 2014 exceeded the demographic and the aggregate. The bank's refinance lending in moderate-income tracts in 2015, 2016 and 2017 was below the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2014 exceeded the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected adequate penetration throughout the assessment area. In 2018, the bank did not make any home improvement loans in low-income census tracts while the aggregate made (13 loans) 1.0% by number and 1.0% by dollar in low-income census tracts. The bank's home improvement lending in low-income census tracts, by number, was below the 1.6% of owner-occupied housing units located in low-income census tracts. In 2018, the bank made 12.8% by number and 6.3% by dollar of home improvement loans in moderate-income census tracts. The bank's home improvement lending in moderate-income census tracts, by number, was below the 14.2% of owner-occupied housing units located in moderate-income census tracts but exceeded the aggregate, which made 10.0% by number and 6.7% by dollar in moderate-income census tracts.

M&T's home improvement lending in 2014-2017 generally exceeded 2018's performance. Performance in low-income tracts was consistent with 2018 performance, as the bank did not make any home improvement loans in 2015 and 2016 while it made one in 2014 and 2017. Aggregate home improvement volume over 2014-2017 in low-income tracts was limited, as well. In 2014, 2016 and 2017 home improvement lending in moderate-income tract's exceeded the demographic and was similar to or exceeded the aggregate. In 2015, home improvement lending was slightly below the demographic but exceeded the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018, the bank made 2.2% by number and 0.5% by dollar of small business loans in low-income census tracts. The bank's small business lending in low-income census tracts was comparable to the demographic of the assessment area where 2.3% of small businesses were located in low-income census tracts but slightly below the aggregate, which made 2.4% by number and 2.0% by dollar in low-income census tracts. In moderate-income tracts in 2018, the bank made 14.2% by number and 12.3% by dollar of small business loans in moderate-income census tracts. Small business lending in moderate-income census tracts, by number, was below the

demographic of the assessment area where 18.5% of small businesses were located and below the aggregate, which made 17.7% by number and 16.2% by dollar, in moderate-income census tracts.

In 2014–2017, small business lending was consistent overall with 2018 performance. In 2015 and 2017, small business lending exceeded the demographic while in 2014 and 2016 it was below the demographic. In low-income census tracts, small business lending was similar to or exceeded the aggregate in all years except 2016. In moderate-income tracts in 2014, the bank's small business lending exceeded the demographic and the aggregate. The bank's small business lending in moderate-income census tracts in 2015, 2016 and 2017 was below the demographic but similar to or slightly below the aggregate.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 42540 (Scranton-Wilkes Barre-Hazleton, PA) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was good and lending to businesses with gross annual revenues of $1 million or less was excellent. Greater weight was given to the analysis of HMDA lending based on the overall loan volumes in the assessment area.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers, which comprised 13.5% by number and 7.7% by dollar, exceeded the aggregate lending data, at 10.5% by number and 5.8% by dollar; however, performance was below the demographic figure, at 21.3%. The bank's lending to moderate-income borrowers, at 29.7% by number and 19.7% by dollar, exceeded both the aggregate lending data at 21.7% by number and 15.4% by dollar and the demographic figure of 17.7%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was slightly above the bank's 2018 lending performance. Lending to low-income borrowers was slightly above the aggregate data lending, except for 2015 lending, which was comparable to the aggregate lending data. However, when compared to the demographic figure, the bank's lending was below the demographic. The bank's lending to moderate-income borrowers in 2014-2017 was slightly below the 2018 performance. The bank's lending in 2017 was consistent with 2018 performance, exceeding both the aggregate and demographic figure. Lending in 2014 and 2015 to moderate income borrowers was comparable to the aggregate lending data and the demographic figure, while 2016 lending was below both the aggregate data, and demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 15.5% by number and 10.2% by dollar, was above the aggregate lending data, at 10.6% by number and 6.2% by dollar. However, the bank's lending was below the demographic figure, at 21.3%. The bank's lending to moderate-income borrowers, at 20.8% by number and 16.3% by dollar, was comparable to the aggregate lending data, at 18.3% by number and 13.4% by dollar, and slightly above the demographic figure at 17.7%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was below with the bank's 2018 lending performance. Lending to low-income borrowers was below the aggregate data lending and significantly below the demographic figure, except for 2017 lending, which was comparable to the aggregate lending data, but still significantly below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was below the 2018 performance. The bank's lending was below both the aggregate lending data and the demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 14.1% by number and 10.1% by dollar, was above the aggregate lending data, at 8.9% by number and 6.4% by dollar, while it fell below the demographic figure, at 21.3%. The bank's lending to moderate-income borrowers, at 20.5% by number and 21.9% by dollar, was comparable to both the aggregate lending data, at 18.0% by number and 14.5% by dollar, and the demographic figure, at 17.7%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending in each year. Performance was consistent with the demographic figure in each year, except for 2015 when it was below the demographic. The bank's lending to moderate-income borrowers in 2014-2017 was above the 2018 performance. The bank's lending was above both the aggregate lending data and the demographic figure in each year of the review period.

Small Business

The distribution of borrowers reflected, given the product lines offered, excellent penetration among businesses of different sizes. In 2018, the bank originated 68.3% of loans by number and 35.7% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending significantly exceeded aggregate lending data, at 41.9% by number, and 35.1% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 90.0%. While the bank's loan volume was significantly below

the demographic figure, the bank originated 79.2% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was comparable to the 2018 lending. Lending was above the aggregate lending data but significantly fell below the demographic figure.

Community Development Lending

M&T made an adequate level of community development loans in MSA 42540 (Scranton-Wilkes Barre-Hazleton, PA) with four community development loans for $39.3 million. M&T ranked 1st out of five similarly-situated banks when comparing annualized community development loans to deposits within MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA).

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Community Services	1	20,250
Revitalize & Stabilize	3	19,000
Total	**4**	**$39,250**

According to dollar volume, community services initiatives represented 51.6% of total community development lending and revitalization and stabilization initiatives constituted 48.4%.

As an example of the community development activity, the community development loan targeted to community services was for the acquisition of two skilled nursing facilities providing healthcare services predominately to individuals eligible for Medicaid.

INVESTMENT TEST

M&T's performance in MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA) is based on the following summary. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made occasional use of innovative or complex investments to support community development activities and exhibited adequate responsiveness to credit and community development needs of the assessment area. During the evaluation period, the bank made seven qualified investments totaling $18.5 million, in the MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA). Investments consisted of $12.8 million during the current period and $5.8 million outstanding from the prior period. When compared to five similarly-situated institutions with mixed ratings from Needs to Improve to Outstanding in the assessment area, M&T ranked second.

More qualified investments were made by number during the evaluation period; however, by annualized dollar amount, qualified investment activity decreased from the $27.1 made at the previous evaluation.

Qualified Community Development Investments by Purpose

October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 42540 (Scranton-Wilkes Barre-Hazleton, PA) - New	0	0	1	12,750	0	0	0	0	1	12,750
MSA 42540 (Scranton-Wilkes Barre-Hazleton, PA) – Prior Period	6	5,758	0	0	0	0	0	0	6	5,758
Total	6	5,758	1	12,750	0	0	0	0	7	18,508

The following is an example of a qualified investment that met critical needs in the assessment area:

- A $12.5 million investment in a City of Scranton municipal bond. Proceeds of the bond issue supported municipal services in an LMI community. The median household income of the community is 58% of the MSA median income.

In addition to qualified investments, the bank made grants or donations totaling $1.5 million to 205 organizations in the assessment area during the evaluation period. The majority of grants and donations were primarily comprised of funds for community services.

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 42540 (Scranton-Wilkes Barre-Hazleton, PA)	8	21,000	194	1,487,210	3	28,200	0	0	205	1,536,410

SERVICE TEST

M&T's performance under the service test in the assessment area is based on the following summary. The bank was a leader in providing community development services in MSA 42540 (Scranton-Wilkes-Barre-Hazleton, PA). M&T's delivery systems were accessible to the bank's geographies and individuals of different income levels in its assessment area, changes in branch locations did not adversely affect the accessibility of the bank's delivery systems particularly to LMI geographies and or LMI individuals, and services were tailored to the convenience and needs of the assessment area particularly LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were accessible to geographies and individuals of different income levels in this assessment area. M&T operated 11 branches in this assessment area, of which one (9.1%) was in a low-income area and one (9.1%) was in a moderate-income area. This was above the 3.1% of the MSA's population residing in low-income tracts and below the 20.5% of the MSA's population residing in moderate-income tracts.

Alternative delivery systems did not enhance the bank's performance in this assessment area. M&T had two off-site ATM locations (branded ATM's) in the assessment area; however, none were in LMI areas.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T closed one branch in an unknown income census tract in MSA 42540 (Scranton-Wilkes Barre-Hazelton, PA).

The bank's hours and services were tailored to the convenience and needs of the assessment area, including LMI geographies and/or LMI individuals. Of the 11 branches in the MSA, all have evening hours and 10 or 90.9% have Saturday hours. Of the two branches located in LMI census tracts, both had extended and Saturday hours.

Community Development Services

M&T was a leader in providing community development services in the MSA 42540 (Scranton-Wilkes Barre-Hazelton, PA) assessment area. The table shows the number and type of services provided during the evaluation period. The bank's management and staff served on the board of directors for 49 nonprofit or community-based organizations in this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	148
Technical Assistance	1
Small Business Seminars	3
Board Participation	49
Total	**201**

METROPOLITAN AREA

(FULL REVIEW)

MSA 11020 (ALTOONA, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 11020 (ALTOONA, PA)

Located in the Allegheny Mountains of central Pennsylvania, MSA 11020 (Altoona, PA) was made up of Blair County. As of December 31, 2018, M&T operated ten branches in MSA 11020 (Altoona, PA), representing 7.4% of its branches in Pennsylvania. Based on deposits reported to the FDIC, as of June 30, 2018, these branches contained approximately $819 million in deposits, or 9.7% of the bank's total branch deposits in the state. M&T ranked 1st in MSA 11020 (Altoona, PA) with 31.9% of the retail deposit market share. There are 14 banks with operating branches in MSA 11020 (Altoona, PA), which are primarily community banks. M&T's primary competitors in the assessment area are First National Bank of Pennsylvania, First Commonwealth Bank, and Citizens Bank of PA.

Community Contacts

A community contact was conducted with a private nonprofit development corporation whose mission is to serve as a catalyst for economic, community and workforce development. The contact noted that a limited number of banks service the area and that participation by the area's financial institutions is good. The contact also noted that smaller banks were more aggressive in seeking to participate with the agency in its financial arrangements. The contact noted that the area has several niche manufacturers, has an older workforce and a need for skilled labor. The contact indicated there was difficulty in finding skilled labor for the manufacturing industry. In addition, the contact noted that housing stock is old and there is no new development, which makes it difficult to attract families to the area.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operated. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

The assessment area encompassed all of MSA 11020 (Altoona, PA) which was located in the Allegheny Mountains in central Pennsylvania. According to the 2015 ACS, MSA 11020 (Altoona, PA)'s population was 126,448. The assessment area contained 3.1% of the bank's State of Pennsylvania combined assessment area population. According to a community contact, although the population of both the city and county has remained stable, a relatively high proportion of

residents were senior citizens, with 21.3% and 16.0% of Blair County and the City of Altoona's population over the age of 65, respectively. The high number of seniors reduced demand for home purchase loans and refinances, as their mortgage lending needs were limited.

Of the 34 census tracts in the assessment area, three or 8.8%, were low-income, four or 11.8% were moderate-income, 25 or 73.5% were middle-income, and two or 5.9% were upper-income.

The City of Altoona is Blair County's urban center and contains 36.0% of the county population. The city is a designated Enterprise Zone. Funds allocated for Enterprise Zone-related programs are earmarked to build and rehabilitate housing in depressed neighborhoods. Tax incentives and financing programs encourage businesses to locate to Enterprise Zone areas.

Income Characteristics

In MSA 11020 (Altoona, PA), the assessment area had 32,758 families, of which 19.9% (10.0% were below the poverty level) were considered low-income and 18.7% were moderate-income. The FFIEC median incomes the assessment area from the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
Assessment Area	$53,166	$57,819
State of Pennsylvania	$63,364	$68,158

Housing Characteristics

The 2015 ACS showed that MSA 11020 (Altoona, PA) had 56,109 housing units, of which 65.3% were owner-occupied and 25.7% were rental units. Of the available owner-occupied units, 12.1% were located in LMI areas. In low-income census tracts, 58.5% of the housing units were rental units, 10.6% were vacant, and 30.9% were owner-occupied. In moderate-income census tracts, 46.3% of the housing units were either rental or vacant, and 53.7% were owner-occupied.

The 2015 ACS showed that the median age of housing stock in the assessment area was 59 years old, with 41.0% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans. The median housing value in the assessment area was $110,601, with an affordability ratio of 39.8. The median gross rent in the assessment area was $638 per month. Within the assessment area, 44.4% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$97,400	43.5	$110,601	39.8	$557	$638	14.5%
State of Pennsylvania	$159,300	31.6	$166,000	32.3	$739	$840	13.7%

Labor, Employment, and Economic Characteristics

MSA 11020 (Altoona, PA) is in transition to a service economy. The largest employment sectors were trade, transportation & utilities, with roughly 15,200 employees or 25.0% of total employment in the MSA. Although 12.0% of residents were still employed in manufacturing, this sector continued to lose jobs. The decreasing and aging population and the lack of a highly skilled labor force hampered the area's growth. However, the education/healthcare sector continued to expand with over 12,000 employees. With a population comprising close to 21.3% of senior citizens, this industry has become an important part of the economy. At present, it provided 20.0% of total employment in the MSA.

According to D&B, the assessment area had a total of 4,889 businesses in 2018, of which 4,322 (88.4%) were small businesses with GAR of $1 million or less. Unemployment slightly improved over the review period falling from 5.7% in 2014 to 4.2% in 2018.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 11020 (Altoona, PA)	5.7	5.1	5.3	4,8	4.2
Blair County	5.7	5.1	5.3	4.8	4.2
State of Pennsylvania	5.9	5.3	5.4	4.9	4.2

Additional performance context data is shown in the subsequent Assessment Area Demographic table.

Assessment Area Demographics

Assessment Area: MSA 11020 (Altoona, PA) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	8.8	1,659	5.1	711	42.9	6,529	19.9
Moderate-income	4	11.8	3,483	10.6	628	18	6,119	18.7
Middle-income	25	73.5	24,454	74.7	1,760	7.2	7,176	21.9
Upper-income	2	5.9	3,162	9.7	176	5.6	12,934	39.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**34**	**100.0**	**32,758**	**100.0**	**3,275**	**10.0**	**32,758**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,700	1,143	3.1	30.9	2,166	58.5	391	10.6
Moderate-income	6,167	3,309	9	53.7	2,138	34.7	720	11.7
Middle-income	41,824	28,425	77.6	68	9,662	23.1	3,737	8.9
Upper-income	4,418	3,740	10.2	84.7	451	10.2	227	5.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**56,109**	**36,617**	**100.0**	**65.3**	**14,417**	**25.7**	**5,075**	**9.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	451	9.2	386	8.9	61	12	4	6.7
Moderate-income	403	8.2	358	8.3	40	7.9	5	8.3
Middle-income	3,747	76.6	3,308	76.5	390	76.9	49	81.7
Upper-income	288	5.9	270	6.2	16	3.2	2	3.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**4,889**	**100.0**	**4,322**	**100.0**	**507**	**100.0**	**60**	**100.0**
	Percentage of Total Businesses:			**88.4**		**10.4**		**1.2**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 11020 (ALTOONA, PA)

LENDING TEST

M&T's performance under the lending test in MSA 11020 (Altoona, PA) is based on the following summary. The bank's lending levels reflected adequate responsiveness to the assessment area credit needs, geographic distribution of loans reflected good penetration throughout the assessment areas, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes, and the bank made a relatively high level of community development loans. Greater weight was given to home improvement and small business lending based on volume.

Lending Activity

M&T's lending levels reflected adequate responsiveness to the assessment area credit needs in MSA 11020 (Altoona, PA). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered adequate, while small business lending was good. For the five-year evaluation period, lending activity totaled 1,345 loans, which consisted of 125 home purchase, 199 refinance, 268 home improvement and 753 small business loans. Lending activity declined by 18.7% on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 662 loans consisting of 84 home purchase, 167 refinance, 116 home improvement, and 295 small business loans. This annualized decrease was driven by decreases in home purchase (-40.5%), refinance (-52.3%), and home improvement (-7.6%) lending. Small business lending increased (2.1%) on an annualized basis. Analysis of the aggregate lending for the evaluation period indicated a decrease in lending volume for the aggregate overall on an annualized basis.

M&T's market share of deposits declined, and lending market share also declined in home purchase and small business lending; however, an increase in refinance lending market share was evident. Home improvement market share was stable. In 2018, M&T had a deposit market share of 31.9%, a lending market share of 1.1% in home purchase, 6.5% in refinance lending, 10.9% in home improvement and 7.7% in small business lending. In comparison, in 2014, the deposit market share in 2014 was 35.1%, lending market share of 2.8% in home purchase lending, 3.2% in refinance lending, 11.4% in home improvement lending, and 9.5% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected good penetration in the MSA 11020 (Altoona, PA) assessment area.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 97.1% of all census tracts in the assessment area when considering HMDA and small business lending. The bank penetrated 100% of low- and moderate-income census tracts in 2018 for HMDA and small business lending. Overall, penetration of different income levels in 2014-2017 for HMDA and small business lending was comparable, as the bank penetrated 97.1% of all census tracts in 2017, 97.1% in 2016, 100.0% in 2015 and 100.0% in 2014.

MSA 11020 (Altoona, PA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	3	0	100.0%
Moderate	4	0	100.0%
Middle	25	1	96.0%

Upper	2	0	100.0%
Unknown	0	0	NA
Total Tracts	34	1	97.1%
2017			
Low	3	0	100.0%
Moderate	4	0	100.0%
Middle	25	1	96.0%
Upper	2	0	100.0%
Unknown	0	0	NA
Total Tracts	34	1	97.1%
2016			
Low	1	0	100.0%
Moderate	5	0	100.0%
Middle	25	1	96.0%
Upper	3	0	100.0%
Unknown	0	0	NA
Total Tracts	34	1	97.1%
2015			
Low	1	0	100.0%
Moderate	5	0	100.0%
Middle	25	0	100.0%
Upper	3	0	100.0%
Unknown	0	0	NA
Total Tracts	34	0	100.0%
2014			
Low	1	0	100.0%
Moderate	5	0	100.0%
Middle	25	0	100.0%
Upper	3	0	100.0%
Unknown	0	0	NA
Total Tracts	34	0	100.0%

Home Purchase

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area primarily based on 2014-2017 performance. In 2018, the bank did not make any

home purchase loans in low-income census tracts. The bank's home purchase lending in low-income census tracts was below the 3.1% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 3.4% by number and 1.8% by dollar in low-income census tracts. In moderate-income census tracts the bank made 6.7% by number and 5.1% by dollar of home purchase loans in moderate-income census tracts. Home purchase lending was below the 9.0% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 10.8% by number and 6.3% by dollar in moderate-income census tracts.

In 2014-2017, home purchase lending performance in LMI census tracts exceeded 2018 performance. The bank did not make any loans in low-income tracts in 2014-2017. In moderate-income census tracts in 2014, 2015, and 2016, the bank's home purchase lending exceeded the demographic and the aggregate, while in 2017, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, M&T made 4.5% by number and 1.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, exceeded the 3.1% of owner-occupied housing units located in low-income census tracts and exceeded the aggregate, which made 2.2% by number and 1.6% by dollar in low-income census tracts. In 2018, M&T made 4.5% by number and 3.3% by dollar volume of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number was below the 9.0% of owner-occupied housing units located in moderate-income census tracts but exceeded the aggregate, which made 8.3% by number and 5.6% by dollar amount in moderate-income census tracts.

In 2014-2017, refinance lending performance in LMI census tracts was below 2018 performance overall. The bank made one refinance loan in a low-income tract in 2017 and none in 2014-2016. In moderate-income census tracts the bank's refinance lending in 2014, 2016 and 2017 was below the demographic and the aggregate. The bank's refinance lending in moderate-income tracts in 2015 exceeded the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made one home improvement loan (2.6%) by number and 1.2% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending in low-income census tracts was below the 3.1% of owner-occupied housing units located in low-income census tracts. The bank made a total of three home improvement loans in low-income census tracts over the review period, which was below the aggregate lending. In 2018, the bank made 10.5% by number and 5.8% by dollar of home improvement loans in

moderate-income census tracts, exceeding the 9.0% of owner-occupied housing units located in moderate-income census tracts and also exceeding the aggregate, which made 7.7% by number and 7.2% by dollar in moderate-income tracts.

In 2014–2017, the bank's home improvement lending was consistent with 2018 performance. In moderate-income census tracts, in 2014, 2015 and 2016, home improvement lending was comparable to the demographic and exceeded the aggregate. In 2017, the bank's home improvement lending in moderate-income tracts exceeded the demographic and the aggregate.

Small Business

The geographic distribution of small business loans reflected good penetration throughout the assessment area. In 2018, the bank made 5.6% by number and 5.1% by dollar of small business loans in low-income census tracts. The bank's small business lending was below the demographic of the assessment area where 9.2% of small businesses were located but exceeded the aggregate, which made 5.4% by number and 2.8% by dollar in low-income census tracts. In 2018, in moderate-income census tracts, the bank made 9.9% by number and 5.7% by dollar of small business loans. The bank's small business lending exceeded the demographic of the assessment area where 8.2% of small businesses were located in moderate-income census tracts and exceeded the aggregate, which made 7.1% by number and 3.4% by dollar in moderate-income census tracts.

In 2014-2017, M&T's small business lending was consistent overall with 2018 performance. In low-income census tracts in 2014 and 2017, small business lending exceeded the demographic and the aggregate, while in 2015, small business lending was below the demographic and the aggregate. The bank's small business lending in low-income census tracts in 2016 was below the demographic but exceeded the aggregate. In moderate-income census tracts in 2014-2017, small business lending in moderate-income census tracts exceeded the demographic and the aggregate.

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

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes in the MSA 11020 (Altoona, PA) assessment area.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers, which comprised 13.3% by number and 9.7% by dollar, exceeded the aggregate lending data, at 11.0% by number and 5.9% by dollar. However, lending was below the demographic figure, at 19.9%. The bank's lending to moderate-income borrowers, at 20.0% by number and 17.9% by dollar, was comparable to both the aggregate lending data at 22.4% by number and 16.8% by dollar, and the demographic figure, at 18.7%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. While for 2015 and 2017 lending to low-income borrowers was below both the aggregate data lending, and the demographic figure, the bank's 2014 lending was above the aggregate lending and comparable to the demographic figure. Lending in 2016 was comparable to the aggregate lending data, while falling below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was slightly above the 2018 performance. The bank's lending in 2017 and 2016 exceeded both the aggregate and demographic figure. Lending in 2015 and 2014 was below both the aggregate lending data and the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 10.6% by number and 6.1% by dollar, was comparable to the aggregate lending data, at 12.9% by number and 7.6% by dollar. However, lending was below the demographic figure, at 19.9%. The bank's lending to moderate-income borrowers, at 21.2% by number and 15.8% by dollar, was comparable to both the aggregate lending data at 20.2% by number and 14.9% by dollar, and the demographic figure, at 18.7%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. While lending in 2017 and 2015 was comparable to the aggregate lending data, 2016 and 2014 was below. In addition, consistent with 2018 lending, 2014-2017 lending to low-income borrowers was below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was above the 2018 performance. 2017 and 2014 lending exceeded both the aggregate lending and demographic figure, while 2016 was comparable to the aggregate lending data, but below the demographic figure, and 2015 lending fell below both aggregate and the demographic figures.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, good penetration among customers of different income levels. The bank's 2018 lending to low-income borrowers was 10.5% by number and 6.6% by dollar. Performance was comparable to the aggregate lending data, at 9.7% by number and 6.0% by dollar; however, performance fell below the demographic figure, at 19.9%. The bank's lending to moderate-income borrowers, at 13.2% by number and 9.3% by dollar, was below both the aggregate lending data at 19.2% by number and 15.5% by dollar, and the demographic figure, at 18.7%, respectively.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded the aggregate data lending in 2017 and 2014, while lending was more comparable in 2015 and 2016. Compared to the demographic figure, 2017 and 2014 performance was comparable, while 2015 and 2016 performance was below. The bank's lending to moderate-income borrowers in 2014-2017 was above the 2018

performance. The bank's lending was above both the aggregate lending data and the demographic figure in all years except for 2016, in which lending was consistent with the aggregate and slightly below the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes for small business loans. In 2018, the bank originated 57.7% of loans by number and 33.7% by dollar to businesses with gross annual revenues of $1 million or less. The bank's lending exceeded aggregate lending data, at 45.2% by number and 34.3% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 88.4%. While the bank's loan volume was significantly below the demographic figure, the bank originated 52.1% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. The bank's lending exceeded aggregate lending data and significantly fell below the demographic figure.

Community Development Lending

M&T's made a relatively high level of development loans in MSA 11020 (Altoona, PA). M&T ranked second out of three similarly-situated institutions when comparing annualized community development loans to deposits in the assessment area.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Economic Development	3	12,507
Revitalize and Stabilize	2	18,000
Total	**5**	**$30,507**

Community development lending consisted of five loans totaling $30.5 million that targeted revitalization and stabilization (59.0%) and economic development (41.0%). The economic development loan helped finance the development of a bakery and distribution center in a Keystone Opportunity Zone and the revitalization stabilization loan helped support the conversion of a former hospital in a moderate-income tract into 94 apartments for independent senior living.

INVESTMENT TEST

M&T's performance in MSA 11020 (Altoona, PA) is based on the following summary. M&T made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors. The bank made no use of innovative or complex investments to support community development initiatives and exhibited poor responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made three qualified investments for $219 thousand. The current period investment was for $143 thousand in a mortgage backed security and the two prior period investments totaled $76 thousand. When compared to three similarly-situated institutions with mixed ratings from Needs to Improve o Outstanding in the assessment area, M&T ranked second.

Qualified Community Development Investments by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 11020 (Altoona, PA) - New	1	143	0	0	0	0	0	0	1	143
MSA 11020 (Altoona, PA) – Prior Period	2	76	0	0	0	0	0	0	2	76
Total	3	219	0	0	0	0	0	0	3	219

In addition to qualified investments, the bank made grants or donations totaling $905,275 to 213 organizations in the assessment area during the evaluation period. The grants and donations were comprised mostly of funds for community services.

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 11020 (Altoona, -PA)	1	3,000	210	874,775	1	25,000	1	2,500	213	905,275

SERVICE TEST

The bank's performance under the service test in the MSA 11010 (Altoona, PA) assessment area is based on the following summary. M&T's delivery systems were readily accessible to the bank's geographies and individuals of different income levels in its assessment area. Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems particularly to LMI geographies and/or LMI individuals, and services did not vary in a way that inconvenienced the needs of its assessment area particularly LMI geographies and/or LMI individuals. M&T provided an adequate level of community development services.

Retail Services

M&T's delivery systems were readily accessible to geographies and individuals of different income levels in this assessment area. M&T operated 10 branches in this assessment area. No branches were in low-income tracts and three (30.0%) of the branches were in a moderate-income area, which compared favorably to the 6.5% and 10.7% of the MSA's population residing in low- and moderate-income areas, respectively.

Alternative delivery systems slightly enhanced the bank's performance in this assessment area. M&T had 4 off-site ATM locations in the assessment area, of which one, or 25.0%, was in a moderate-income area.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, M&T did not open or close any branches in this assessment area.

The bank's hours and services did not vary in a way that inconvenienced the needs of its assessment area, including LMI geographies and/or LMI individuals. Of the 10 branches in the assessment area, six, or 60.0%, had evening hours and Saturday hours. Of the three branches located in LMI census tracts, two or 66.6%, had extended and Saturday hours.

Community Development Services

M&T provided an adequate level of community development services in MSA 11020 (Altoona, PA). The table shows the number and type of services the bank performed during the evaluation period. Management and staff served on the board of directors for 30 nonprofit and community-based organizations in this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	44
Technical Assistance	1
Small Business Seminars	0
Board Participation	30
Total	**75**

METROPOLITAN AREA

(FULL REVIEW)

MSA 39740 (READING, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 39740 (READING, PA)

Located in southeastern Pennsylvania approximately halfway between Philadelphia and the state capital in Harrisburg, M&T's assessment area in MSA 39740 (Reading, PA) consisted of Berks County. As of December 31, 2018, M&T operated thirteen branches in MSA 39740 (Reading, PA), representing 9.6% of its branches in Pennsylvania. Based on deposits reported to the FDIC, as of June 30, 2018, these branches contained approximately $655 million in deposits, or 7.8% of the bank's total branch deposits in the state. M&T ranked 7th in MSA 39740 (Reading, PA) with 4.0% of the retail deposit market share.

There are 17 banks with branches in MSA 39740 (Reading, PA). M&T's primary competitors in the assessment area were Santander Bank N.A., Wells Fargo Bank N.A., Customers Bank, Branch Banking and Trust Company, and Fulton Bank N.A.

Community Contacts

A community contact was conducted with a nonprofit agency whose mission is to ameliorate effects of low-income and poverty in Berks County with programs in housing, energy efficiency, jobs, childcare, and parenting. The contact noted that approximately six years ago, the City of Reading was deemed the most impoverished city in the USA. The contact also noted the area had a sizeable transient, migrant population that typically rents and moves frequently as a result of employment challenges. According to the contact, due to the transient population, poverty needs persist and, as a result of the COVID-19 pandemic, there will be an increased need for rental assistance, mortgage assistance, and utility assistance.

The contact indicated that there is a lack of bank involvement with local nonprofit organizations in the community. Many of the smaller community banks, which helped serve the residents, are now gone. Instead, there are a limited number of larger banks who maintain a small branch presence in the downtown area. Support from these larger financial institutions is rare. The process for obtaining bank grant funding is burdensome and does not make it worth the time to apply.

PERFORMANCE CONTEXT

M&T's assessment area in MSA 39740 (Reading, PA) consisted of Berks County, which was the entire MSA. Its principal city is the City of Reading, which was strategically situated along a major transportation route from Central to Eastern Pennsylvania, and lent its name to the now-defunct, Reading Railroad, which transported anthracite coal from the Pennsylvania Coal Region

to the eastern United States via the Port of Philadelphia. According to the 2015 ACS, the MSA 39740 (Reading, PA) population totaled 413,965. The MSA contained 10.1% of the bank's State of Pennsylvania combined assessment area population.

In 2018, the assessment area had a total of 90 census tracts. Of that total census tracts, 19 or 21.1%, were low-income, 7 or 7.8% were moderate-income, 48 or 53.3% were middle-income, and 16 or 17.8% were upper income and none were unknown-income.

Income Characteristics

In 2018, the MSA 39740 (Reading, PA) assessment area had 105,998 families, of which 21.4% (10.3% were below the poverty level) were considered low-income and 17.1% were moderate-income. The city of Reading, however, had a poverty rate of 35.4% and in 2011 had a poverty rate of 41.3% and was considered the poorest city in the nation. The FFIEC median family incomes for the MSA from the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Geographic Area	**2010**	**2015**
MSA 39740 (Reading, PA)	$63,724	$67,696
State of Pennsylvania	$63,364	$68,158

Housing Characteristics

The 2015 ACS showed that in 2018, MSA 39740 (Reading, PA) had 164,853 housing units, of which 66.9% were owner-occupied and 26.1% were rental units. Of the available owner-occupied units, 11.2% were in LMI areas. In low-income census tracts, 54.6% of the housing units were rental units, 15.4% vacant, and 30.0% were owner-occupied. In moderate-income census tracts, 48.6% of the housing units were either rental or vacant, and 51.4% were owner-occupied.

The median age of housing stock in the assessment area was 51 years old, with 34.4% of the stock built before 1950. The median age of housing stock was 61 years in low- and moderate-income tracts, which indicated a possible need for home improvement loans. The median housing value in the assessment area was $168,188, with an affordability ratio of 33.3. The median gross rent in the assessment area was $851 per month. Within the assessment area, 50.1% of all renters had rental costs that exceeded 30% of their incomes, which indicated it may be difficult for renters to save money for a down payment to purchase a home.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
MSA 39740 (Reading, PA)	$170,403	31.2	$168,188	33.3	$743	$851	14.5%
State of Pennsylvania	$159,300	31.6	$166,000	32.3	$739	$840	13.7%

Labor, Employment and Economic Characteristics

Agriculture and food processing remained one of the most important industries in the Greater Reading Area, alongside of business services, medical device makers and healthcare companies. Specialty steel manufacturing and energy storage technology were also chief employers in the Greater Reading area. According to D&B data, the assessment area had a total of 16,751 businesses in 2018, of which 15,025 (89.7%) were small businesses with GAR of $1 million or less.

The unemployment rate fell slightly during the review period, from 5.5% in 2014 to 4.1% in 2018.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 39740 (Reading, PA)	5.5	4.9	5.0	4.6	4.1
State of Pennsylvania	5.9	5.3	5.4	4.9	4.2

Additional performance context data for this assessment area is provided in the subsequent MSA 39740 (Reading, PA) Assessment Area Demographics table:

Assessment Area Demographics

Assessment Area: MSAC39740 (Reading, PA) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	19	21.1	14,145	13.3	5,931	41.9	22,665	21.4
Moderate-income	7	7.8	4,853	4.6	1,100	22.7	18,178	17.1
Middle-income	48	53.3	60,604	57.2	3,092	5.1	22,651	21.4
Upper-income	16	17.8	26,396	24.9	743	2.8	42,504	40.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**90**	**100.0**	**105,998**	**100.0**	**10,866**	**10.3**	**105,998**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	26,174	7,843	7.1	30	14,304	54.6	4,027	15.4
Moderate-income	8,763	4,500	4.1	51.4	3,335	38.1	928	10.6
Middle-income	92,461	67,388	61.1	72.9	19,995	21.6	5,078	5.5
Upper-income	37,455	30,492	27.7	81.4	5,455	14.6	1,508	4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**164,853**	**110,223**	**100.0**	**66.9**	**43,089**	**26.1**	**11,541**	**7.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,517	9.1	1,361	9.1	146	9.8	10	4.2
Moderate-income	863	5.2	766	5.1	92	6.2	5	2.1
Middle-income	9,826	58.7	8,768	58.4	904	60.7	154	65.3
Upper-income	4,545	27.1	4,130	27.5	348	23.4	67	28.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**16,751**	**100.0**	**15,025**	**100.0**	**1,490**	**100.0**	**236**	**100.0**
	Percentage of Total Businesses:			**89.7**		**8.9**		**1.4**

Based on 2018 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 39740 (READING, PA)

LENDING TEST

M&T's performance under the lending test in MSA 39740 (Reading, PA) is based on the following summary. The bank's lending levels reflected adequate responsiveness to the assessment area credit needs, geographic distribution of loans reflected adequate penetration throughout the assessment area, for HMDA and small business loans, the distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes, and the bank made an adequate level of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to the assessment area credit needs in MSA 39740 (Reading, PA). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered adequate, while small business lending was good. For the five-year evaluation period, lending activity totaled 1,315 loans consisting of 188 home purchase, 236 refinance, 179 home improvement and 712 small business loans. HMDA and small business volume for the evaluation period decreased 11.0% on an annualized basis compared to the previous evaluation period, during which lending activity totaled 596 loans consisting of 102 home purchase, 215 refinance, 39 home improvement, and 240 small business loans. This annualized decrease was driven primarily by annualized declines in home purchase (-21.2%) and refinance (-56.5%) lending. Annualized increases occurred in home improvement (83.6%) small business (18.7%) loan volumes. Analysis of the aggregate lending for the evaluation period indicated an increase in lending volume for the aggregate overall on an annualized basis.

M&T's market share of deposits was stable while lending market share in the assessment area increased. In 2018, M&T had a deposit market share of 4.0%, and lending market shares of 0.4% in home purchase lending, 4.6% in refinance, 6.7% in home improvement and 2.7% in small business lending. In comparison, the deposit market share in 2014 was 6.3%, with a lending market share of 1.1% in home purchase lending, 1.0% in refinance lending, 5.2% in home improvement lending, and 2.3% in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration in the MSA 39740 (Reading, PA) assessment area. Lending penetration in LMI tracts was considered adequate based on adequate home purchase, refinance and small business lending and good home improvement lending.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 86.7% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 63.2% of low-income census tracts and 71.4% of moderate-income census tracts. Penetration of different income levels in 2014-2017 for HMDA and small business lending was slightly lower, as the bank penetrated 75.6% of all census tracts in 2017, 74.4% in 2016, 80.0% in 2015 and 82.2% in 2014.

MSA 39740 (Reading, PA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	19	7	63.2%
Moderate	7	2	71.4%
Middle	48	3	93.8%
Upper	16	0	100.0%
Unknown	0	0	NA
Total Tracts	90	12	86.7%
2017			
Low	19	6	68.4%
Moderate	7	3	57.1%
Middle	48	10	79.2%
Upper	16	3	81.3%
Unknown	0	0	NA
Total Tracts	90	22	75.6%
2016			
Low	18	10	44.4%
Moderate	9	6	33.3%
Middle	46	5	89.1%
Upper	17	2	88.2%
Unknown	0	0	NA
Total Tracts	90	23	74.4%
2015			
Low	18	9	50.0%
Moderate	9	2	77.8%
Middle	46	3	93.5%
Upper	17	4	76.5%
Unknown	0	0	NA
Total Tracts	90	18	80.0%
2014			
Low	18	6	66.7%
Moderate	9	3	66.7%
Middle	46	4	91.3%
Upper	17	3	82.4%

Unknown	0	0	NA
Total Tracts	90	16	82.2%

Home Purchase

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 17.9% by number and 7.3% by dollar of home purchase loans in low-income census tracts, exceeding the demographic of 7.1% of owner-occupied housing units located in low-income census tracts, as well as the aggregate, which made 6.6% by number and 2.9% by dollar. In moderate-income census tracts in 2018, the bank made 3.6% by number and 2.6% by dollar of home purchase loans, which was below the below the 4.1% of owner-occupied housing units located in moderate-income census tracts. M&T's home purchase lending was also below the aggregate, which made 5.2% by number and 2.9% by dollar, in moderate-income census tracts.

In 2014–2017, home purchase performance was consistent with 2018 performance. In low-income census tracts in 2014 and 2017, the bank's home purchase lending exceeded the demographic and the aggregate. In 2015, the bank's home purchase lending in low-income census tracts was below the demographic and exceeded the aggregate. In 2016, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate. In 2014 and 2015, the bank's home purchase lending in moderate-income census tracts exceeded the demographic and the aggregate. In 2016 and 2017, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 3.1% by number and 1.3% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was below the 7.1% of owner-occupied housing units located in low-income census tracts but was comparable to the aggregate, which made 3.1% by count and 1.4% by dollar in low-income census tracts. In 2018, M&T did not make any refinance loans in moderate-income tracts while 4.1% of owner-occupied housing units were in moderate-income census tracts. M&T's refinance lending in moderate-income census tracts was also below the aggregate, which made 3.0% by number and 2.0% by dollar in moderate-income census tracts.

M&T's performance in 2014-2017 was generally consistent with 2018's adequate penetration. In 2014 and 2017, the bank's refinance lending in low-income census tracts was below the demographic yet exceeded the aggregate. In 2015 and 2016, the bank's refinance lending in low-income census tracts was below the demographic and the aggregate. In moderate-income census tracts, the bank's refinance lending in 2014 and 2015 exceeded the demographic and the aggregate.

In 2016 refinance lending was below the demographic and exceeded the aggregate. In 2017, refinance lending in moderate-income census tracts was below the demographic and the aggregate.

Home Improvement

The geographic distribution of home improvement loans reflected good penetration throughout the assessment area. In 2018, the bank made 3.7% by number and 2.4% by dollar of home improvement loans in low-income census tracts. The bank's home improvement lending in low-income census tracts, by number, was below the 7.1% of owner-occupied housing units located in low-income census tracts and was below the aggregate, by number, which made 4.1% in low-income census tracts. The bank's home improvement lending in low-income census tracts by dollar was comparable to the aggregate, which made 2.3% by dollar in low-income census tracts. In 2018, the bank made 1.9% by number and 1.7% by dollar of home improvement loans in moderate-income census tracts, which was below the 4.1% of owner-occupied housing units located in moderate-income census tracts, and was below the aggregate, which made 2.9% by number and 1.8% by dollar in moderate-income census tracts.

In 2014-2017, the bank's home improvement lending performance exceeded 2018 performance for low-income tracts and was comparable to 2018 performance in moderate-income tracts. In 2014 and 2017, the bank's home improvement lending in low-income census tracts exceeded both the demographic and the aggregate. In 2015, the bank's home improvement lending in low-income census tracts was below the demographic and the aggregate. In 2016, the bank's home improvement lending in low-income census tracts exceeded the demographic and was comparable to the aggregate. In moderate-income census tracts, M&T's home improvement lending in 2014 exceeded the demographic but was below the aggregate. In 2015 and 2016, the bank's home improvement lending in moderate-income tracts was below the demographic and the aggregate. In 2017, the bank's home improvement lending in moderate-income tracts was below the demographic and comparable to the aggregate.

Small Business

The geographic distribution of small business loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 12.2% by number and 15.4% by dollar of small business loans in low-income census tracts, exceeding the demographic of the assessment area where 9.1% of businesses were located in low-income census tracts. M&T's small business lending in low-income census tracts also exceeded the aggregate, which made 7.5% by number and 7.1% by dollar in low-income census tracts. In 2018, the bank made 3.3% by number and 0.4% by dollar of small business loans in moderate-income census tracts. The bank's small business lending in moderate-income census tracts, by number, was below the demographic of the assessment area where 5.2% of businesses were located in moderate-income census tracts. The bank's small business lending was also below the aggregate, which made 3.9% by number and 3.6% by dollar in moderate-income census tracts.

In 2014-2017, M&T's small business lending performance was comparable to 2018's performance. In low-income census tracts in 2014 and 2017, the bank exceeded the demographic and the aggregate, while in 2015 and 2016 the bank's performance was below the demographic and comparable to the aggregate. In moderate-income census tracts, small business lending in 2014, 2016 and 2017 was below the demographic and the aggregate. The bank's small business lending in moderate-income census tracts in 2015 exceeded the aggregate and the demographic.

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

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes in the MSA 39740 (Reading, PA) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was adequate and lending to businesses with gross annual revenues of $1 million or less was good.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to low-income borrowers, which comprised 10.7% by number and 5.8% by dollar, was comparable to the aggregate lending data, at 8.8% by number and 4.5% by dollar. However, lending was below the demographic figure, at 21.4%. The bank's lending to moderate-income borrowers, at 25.0% by number and 26.6% by dollar, was also comparable to the aggregate lending data, at 24.7% by number and 19.0% by dollar, while it exceeded the demographic figure, at 17.1%.

M&T's lending to low-income borrowers for 2014-2017 was consistent with the bank's 2018 lending performance. Lending to low-income borrowers was consistent with the aggregate lending data lending and below the demographic figure, with the exception of 2015 lending, which slightly exceeded aggregate lending. The bank's lending to moderate-income borrowers in 2014-2017 was below the 2018 performance. The bank's lending was below the aggregate performance and comparable to the demographic figure, except for 2015 lending, which exceeded both the aggregate lending data and the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 16.2% by number and 9.7% by dollar, exceeded the aggregate lending data, at 8.1% by number and 4.8% by dollar. However, the bank's lending was below the demographic figure, at 21.4%. The bank's lending to moderate-income borrowers, at 20.0% by number and 16.1% by dollar, was comparable to both the aggregate lending data, at 21.1% by number, and 17.2% by dollar, and the demographic figure, at 17.1%, respectively.

M&T's lending to low-income borrowers for 2014-2017 was consistent to the bank's 2018 lending performance. Lending in 2014 and 2017 exceeded the aggregate lending data, while lending in 2015 and 2016 was comparable. Consistent with 2018 lending, 2014-2017 lending to low-income borrowers was below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was comparable to the 2018 performance. In 2015 and 2016, lending was comparable to both the aggregate lending and demographic figure, while 2017 and 2014 lending was below both aggregate lending, and the demographic figure.

Home Improvement

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for home improvement loans. The bank's 2018 lending to low-income borrowers, which comprised 18.5% by number and 15.1% by dollar, was above the aggregate lending data, at 8.2% by number and 6.1% by dollar, and was comparable to the demographic figure, at 21.4%. The bank's lending to moderate-income borrowers, at 11.1% by number and 9.5% by dollar by number, was below both the aggregate lending data at 15.0% by number and 11.9% by dollar, and the demographic figure, at 17.1%.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers exceeded both the aggregate data lending, and the demographic figure, with the exception of 2016 lending that was comparable to the aggregate lending data and was below the demographic figure. The bank's lending to moderate-income borrowers in 2014-2017 was above the 2018 performance. The bank's lending exceeded both the aggregate lending data, and the demographic figure in each year, except for 2015 lending, which was comparable to both the aggregate lending data and the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes. In 2018, the bank originated 64.6% of loans by number and 35.8% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending significantly exceeded aggregate lending data, at 47.7% by number and 34.8% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 89.7%. While the bank's loan volume was significantly below the demographic figure, the bank originated 81.8% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was consistent with 2018 lending. The bank's lending exceeded aggregate lending data but fell below the demographic figure. Additionally, the bank originated 81.8% of its loans in amounts of $100,000 or less.

Community Development Lending

The bank made an adequate level of community development loans in MSA 39740 (Reading, PA). The bank originated one SBA 504 loan for $6.2 million to expand operations of a machine and custom welding shop in MSA 39740 (Reading, PA). Expansion of the facility will allow the company to bring additional jobs benefitting LMI individuals to the assessment area.

INVESTMENT TEST

M&T's performance in MSA 39740 (Reading, PA) is based on the following summary. The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, and occasionally in a leadership position. The bank made rare use of innovative or complex investments to support community development activities and exhibited good responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made five qualified investments totaling $7.1 million, in the MSA 39740 (Reading, PA), which were all from the current period. When compared to five similarly-situated institutions with mixed ratings from Low Satisfactory to Outstanding in the assessment area, M&T ranked third.

When annualized, the bank's activity, by count, represented a significant decrease. However, when annualizing dollar amounts, the bank's investment activity significantly increased over the $5.5 million made at the previous evaluation but were no longer outstanding for this review period.

Qualified Community Development Investments by Purpose
October 1, 2014 – December 31, 2019

	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 39740 (Reading, PA) - New	4	961	1	6,100	0	0	0	0	5	7,061
MSA 39740 (Reading, PA) – Prior Period	0	0	0	0	0	0	0	0	0	0
Total	4	961	1	6,100	0	0	0	0	5	7,061

Examples of the bank's investment activity include:

- Four investments, totaling approximately $1.0 million, by supporting affordable housing needs through the purchase of mortgage backed securities.

- One investment of $6.1 million in a municipal bond used proceeds to fund the renovation of the Old Main Building that will house a not-for-profit community service provider for LMI clientele.

In addition to qualified investments, the bank made grants or donations totaling $667,591 to 137 organizations in the assessment area during the evaluation period. The grants and donations were comprised of funds for community services.

Qualified Community Development Donations by Purpose October 1, 2014 – December 31, 2019										
	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
Area	#	$	#	$	#	$	#	$	#	$
MSA 39740 Reading, PA)	4	14,500	124	624,691	8	27,900	1	500	137	667,591

SERVICE TEST

M&T's performance under the service test in MSA 39740 (Reading, PA) is based on the following summary. M&T's delivery systems which were reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area, changes in branch locations that did not adversely affect the accessibility of the bank's delivery systems particularly to LMI geographies and/or LMI individuals, and the bank provided an adequate level of community development services. However, the bank's hours and services varied in a way that inconvenienced its assessment area particularly LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were reasonably accessible to geographies and individuals of different income levels in the assessment area. M&T operated 13 branches in MSA 39740 (Reading, PA). Of the total branches, one (7.7%) was in a low-income area and zero were in moderate-income areas, compared to 15.5% and 5.5% of the assessment area's population that resided in low- and moderate-income areas, respectively.

Alternative delivery systems did not enhance the bank's performance in the assessment area. M&T had 10 off-site ATM locations (M&T - 1, branded - 9) in the MSA; none of which were located in LMI tracts.

The bank's record of opening and closing branches affected the accessibility of its delivery system, particularly to LMI geographies and/or LMI individuals. During the evaluation period, the bank did not open nor close a branch location.

The bank's hours inconvenienced the needs of its assessment area, particularly LMI geographies and/or LMI individuals. Of the bank's 13 branches in the MSA, 10 branches, or 76.9%, had extended hours and 11 branches or 84.6% had Saturday hours. The one branch in a low-income census tract did not offer extended nor Saturday hours.

Community Development Services

M&T provided an adequate level of community development services in MSA 39740 (Reading, PA). The table shows the type of services the bank performed during the evaluation period. Management and staff served on the board of directors for 21 nonprofit and community-based organizations in this assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	#
Financial Education	48
Technical Assistance	0
Small Business Seminars	1
Board Participation	21
Total	**70**

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 14100 (BLOOMSBURG-BERWICK, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 14100 (BLOOMSBURG-BERWICK, PA)

A limited evaluation of M&T's performance in MSA 14100 (Bloomsburg-Berwick, PA) was conducted. M&T's assessment area consisted of all of Columbia and Montour Counties, which was the entire MSA. The principal cities in the assessment area were Bloomsburg in Columbia County and Danville in Montour County. The assessment area had a population of 85,420, with in 66,912 Columbia County and 18,508 in Montour County. According to 2018 D&B information, MSA 14100 (Bloomsburg-Berwick, PA) had 3,319 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 14100 (Bloomsburg-Berwick, PA)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	19.0
Moderate Income	3	15.8	11.6	19.2
Middle Income	13	68.4	71.2	21.0
Upper Income	3	15.8	17.2	40.8
Unknown	0	0.0	0.0	0.0
Total	**19**	**100.0**	**100.0**	**100.0**

M&T maintained three branches in this assessment area, one of which was in a moderate-income census tract. M&T ranked fifth in the assessment area out of eight banks in deposit market share with 7.0% of all deposits in the MSA. The assessment area had 1.2% of all M&T's deposits in Pennsylvania.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 14100 (BLOOMSBURG-BERWICK, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance as geographic and borrower

distribution performance was adequate. M&T made two community development loans in the MSA during the evaluation period totaling $2.2 million. The loans both supported projects with the purpose of revitalization and stabilization of LMI census tracts. Investment test performance was consistent with the High Satisfactory performance in the State of Pennsylvania, as the bank had one new investment for $511,000, prior period investment for $8.7 million and $8,724 in grants and donations. Service test performance was consistent with the High Satisfactory rating for the State of Pennsylvania. Of the three branches in the assessment area, one was located in a moderate-income tract. M&T provided a relatively high level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 14100 (Bloomsburg-Berwick, PA)	Below	Consistent	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 16540 (CHAMBERSBURG-WAYNESBORO, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 16540 (CHAMBERSBURG-WAYNESBORO, PA)

A limited evaluation of M&T's performance in MSA 16540 (Chambersburg-Waynesboro, PA) was conducted. M&T's assessment area consisted of all of Franklin County, which was located in south central Pennsylvania and consisted of the entire MSA. The principal city in Franklin County was the City of Chambersburg. The assessment area had a population of 152,285, all in Franklin County. According to 2018 D&B information, MSA 16540 (Chambersburg-Waynesboro, PA) had 6,323 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 16540 (Chambersburg-Waynesboro, PA)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	1	3.7	1.4	18.6
Moderate Income	4	14.8	6.5	19.9
Middle Income	20	74.1	82.7	22.3
Upper Income	2	7.4	9.4	39.2
Unknown	0	0.0	0.0	0.0
Total	**27**	**100.0**	**100.0**	**100.0**

M&T maintained ten branches in the MSA, two of which were in LMI census tracts. M&T ranked 3rd in the MSA out of seven banks with 19.0% of all deposits in the MSA. The MSA had 4.9% of all M&T's deposits in the State of Pennsylvania.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 16540 (CHAMBERSBURG-WAYNESBORO, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance, as lending activity and borrower and geographic distribution were each good. The bank also provided a high level of community development loans. M&T made five community development loans for $12.5 million

in the MSA during the evaluation period. Investment test performance was consistent with the High Satisfactory performance in the state given the bank's limited presence, as the bank had $937,000 in new qualified mortgage backed security investments, $250,000 in prior period investments, and $332,134 in grants and donations. Service test performance was consistent with the High Satisfactory rating for the State of Pennsylvania. Two (20.0%) of the bank's ten branches in the assessment area were located in moderate-income tracts. In addition, the bank provided a relatively high level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 16540 (Chambersburg-Waynesboro, PA)	Consistent	Consistent	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 20700 (EAST STROUDSBURG, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 20700 (EAST STROUDSBURG, PA)

A limited evaluation of M&T's performance in MSA 20700 (East Stroudsburg, PA) was conducted. M&T's assessment area consisted of all of Monroe County, which was the entire MSA. The principal city in the assessment area was East Stroudsburg. The assessment area had a population of 167,881, all in Monroe County. According to 2018 D&B information, MSA 48060 (East Stroudsburg, PA) had 6,029 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 20700 (East Stroudsburg, PA)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	20.7
Moderate Income	5	15.2	8.0	18.1
Middle Income	26	78.8	86.4	21.3
Upper Income	2	6.1	5.6	39.9
Unknown	0	0.0	0.0	0.0
Total	**33**	**100.0**	**100.0**	**100.0**

M&T maintained one branch in the MSA, which was not located in an LMI census tract. M&T ranked 13th in the MSA out of 15 banks, with 1.2% of all deposits in the assessment area. The assessment area had less than 1.0% of all M&T's deposits in the State of Pennsylvania.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 20700 (EAST STROUDSBURG, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance, as lending activity and borrower and geographic distribution were all adequate. M&T did not make any community development loans in the MSA during the evaluation period. Investment test performance was below the High Satisfactory performance in the State of Pennsylvania as the bank did not have any qualified investments and had $8,000 in grants and donations. Service test performance was below the High Satisfactory rating for the State of Pennsylvania. The bank operated one branch in the

assessment area, which was located in a middle-income tract. In addition, the bank provided a limited level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 20700 (East Stroudsburg, PA)	Below	Below	Below

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 23900 (GETTYSBURG, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 23900 (GETTYSBURG, PA)

A limited evaluation of M&T's performance in MSA 23900 (Gettysburg, PA) was conducted. M&T's assessment area consisted of all of Adams County, which was the entire MSA. The principal city of the county was the City of Gettysburg, PA. The assessment area had a population of 101,767, all in Adams County. According to 2018 D&B information, MSA 23900 (Gettysburg, PA) had 4,630 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 23900 (Gettysburg, PA)				
Income Category	***Tract Distribution***		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	17.9
Moderate Income	1	4.3	2.2	18.6
Middle Income	19	82.6	83.9	24.3
Upper Income	3	13.0	13.9	39.3
Unknown	0	0.0	0.0	0.0
Total	**23**	**100.0**	**100.0**	**100.0**

M&T maintained one branch in the MSA, which was located in a moderate-income census tract. M&T ranked 4th in the MSA out of four banks in deposit market share, with 5.0% of all deposits in the MSA. The MSA had 0.9% of all M&T's deposits in the State of Pennsylvania.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 23900 (GETTYSBURG, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance, as lending activity was good while borrower and geographic distribution were adequate. M&T did not make any community development loans in the assessment area during the evaluation period. Investment test performance was below the High Satisfactory performance in the State of Pennsylvania, as the bank made only grants and donations of $35,250. Service test performance was consistent with the High Satisfactory rating for the State of Pennsylvania. The bank operated one branch, which

was located in a moderate-income census tract. In addition, the bank provided an adequate level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 23900 (Gettysburg, PA)	Below	Below	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 29540 (LANCASTER, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS TESTS IN MSA 29540 (LANCASTER, PA)

A limited evaluation of M&T's performance in MSA 29540 (Lancaster, PA) was conducted. M&T's assessment area consisted of all of Lancaster County, which was the entire MSA. The principle city in the assessment area was Lancaster City. The assessment area had a population of 530,216, all in Lancaster County. According to 2018 D&B information, MSA 29540 (Lancaster, PA) had 24,426 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 29540 (Lancaster, PA)				
Income Category	***Tract Distribution***		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	6	6.1	1.6	18.3
Moderate Income	14	14.3	8.8	19.2
Middle Income	67	68.4	76.1	23.1
Upper Income	11	11.2	13.5	39.4
Unknown	0	0.0	0.0	0.0
Total	**98**	**100.0**	**100.0**	**100.0**

M&T maintained 8 branches in the assessment area, none of which were in LMI census tracts. M&T ranked 7th in the MSA out of 22 banks in deposit market share, with 3.3% of all deposits in the MSA. The MSA had 4.3% of all M&T's deposits in the State of Pennsylvania.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 29540 (LANCASTER, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance as lending activity and geographic distribution were good while borrower distribution was adequate. The bank provided a relatively high level of community development loans in the assessment area. M&T made six community development loans for $13.9 million during the evaluation period. Investment test performance was below the High Satisfactory performance in the State of Pennsylvania, as the bank had one new qualified investment for $738,000, but maintained three

prior period investments totaling $3.3 million, as well as grants and donations of $751,250. Service test performance was also below the High Satisfactory rating for the State of Pennsylvania. The bank had eight branches in the assessment area, none of which were in LMI census tracts. The bank provided an adequate level of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 29540 (Lancaster, PA)	Consistent	Below	Below

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 30140 (LEBANON, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 30140 (LEBANON, PA)

A limited evaluation of M&T's performance in MSA 30140 (Lebanon, PA) was conducted. M&T's assessment area consisted of all of Lebanon County, which was the entire MSA. The principal city of the county was the City of Lebanon, PA. The assessment area had a population of 135,776, all in Lebanon County. According to 2018 D&B information, MSA 30140 (Lebanon, PA) had 5,172 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 30140 (Lebanon, PA)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	1	3.2	1.3	18.0
Moderate Income	6	19.4	12.1	19.0
Middle Income	20	64.5	67.8	24.8
Upper Income	4	12.9	18.8	38.2
Unknown	0	0.0	0.0	0.0
Total	**31**	**100.0**	**100.0**	**100.0**

M&T maintained one branch in the MSA, which was in a moderate-income census tract. M&T ranked 7th in the MSA out of eleven banks in deposit market share, with 3.7% of all deposits in the MSA. The assessment area had 1.0% of all M&T's deposits in the State of Pennsylvania.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 30140 (LEBANON, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance. Lending activity, geographic distribution and borrower distribution were all adequate. The bank also provided an adequate level of community development loans. M&T made one community development loan for $100,000 during the evaluation period. Investment test performance was below the High Satisfactory performance in the State of Pennsylvania, as the bank had one prior period investment for $645,000

million and grants and donations of $16,700. Service test performance was consistent with the High Satisfactory rating for the State of Pennsylvania. The bank operated one branch in the assessment area, which was located in a moderate-income census tract and the institution provided an adequate level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 30140 (Lebanon, PA)	Below	Below	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 44300 (STATE COLLEGE, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 44300 (STATE COLLEGE, PA)

A limited evaluation of M&T's performance in MSA 44300 (State College, PA) was conducted. M&T's assessment area consisted of all of Centre County, which was the entire MSA. The City of State College was the principal city. State College is in the center of Pennsylvania and is home to Penn State University. The assessment area had a population of 157,823, all in Centre County. The MSA 44300 (State College, PA) had 6,053 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 44300 (State College, PA)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	1	3.2	0.0	19.6
Moderate Income	6	19.4	16.0	18.5
Middle Income	8	38.7	51.7	21.5
Upper Income	12	25.8	31.5	40.3
Unknown	4	12.9	0.0	0.0
Total	**31**	**100.0**	**100.0**	**100.0**

M&T maintained four branches in the MSA, of which two were in LMI census tracts. M&T ranked 5th in the MSA out of 16 banks with 7.5% of all deposits in the MSA. M&T had 3.1% of all M&T's deposits in the State of Pennsylvania in this MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 44300 (STATE COLLEGE, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance, as lending activity and borrower distribution were good, while geographic distribution was poor. Community development lending performance was adequate. M&T made one community development loan

for $2.5 million during the evaluation period. Investment test performance was consistent with the High Satisfactory performance in the State of Pennsylvania, as the bank made one investment totaling $8.8 million. The bank also had $535,937 outstanding on a prior period investment in an LIHTC fund for construction of affordable housing. Additionally, grants totaling $308,485 were made during the evaluation period. Performance under the service test was consistent with the High Satisfactory rating for the State of Pennsylvania. The bank operated four branches in the assessment area, of which two were located in moderate-income census tracts. M&T also provided a high level of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 44300 (State-College, PA)	Below	Consistent	Consistent

METROPOLITAN AREA

(LIMITED REVIEW)

MSA 48700 (WILLIAMSPORT, PA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 48700 (WILLIAMSPORT, PA)

A limited evaluation of M&T's performance in MSA 48700 (Williamsport, PA) was conducted. M&T's assessment area consisted of all of Lycoming County, which was the entire MSA. The principal city in the assessment area was the City of Williamsport, PA. The assessment area had a population of 116,656, all in Lycoming County. According to 2018 D&B information, MSA 48700 (Williamsport, PA) had 5,055 business establishments. Key demographics are listed on the chart below:

Assessment Area Demographics – MSA 48700 (Williamsport, NY)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	2	6.9	1.4	20.0
Moderate Income	4	13.8	7.2	18.7
Middle Income	21	72.4	84.3	22.0
Upper Income	2	6.9	7.0	39.2
Unknown	0	0.0	0.0	0.0
Total	**29**	**100.0**	**100.0**	**100.0**

M&T maintained three branches in the MSA, one of which was in a moderate-income census tract. M&T ranked 4th in the assessment area out of twelve banks in deposit market share with 13.7% of all deposits in the MSA. The MSA had 0.4% of all M&T's deposits in the State of Pennsylvania.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 48700 (WILLIAMSPORT, PA)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance. Borrower and geographic distribution performance were both adequate. The bank provided a relatively high level of community development loans. M&T made six community development loans for $14.6 million

during the evaluation period. Investment test performance was below the High Satisfactory performance in the State of Pennsylvania, as the bank had one prior period investment for $1.5 million and grants and donations of $195,810. Service test performance was below the High Satisfactory rating for the State of Pennsylvania as the bank operated one of three branches in the assessment area in a moderate-income area. However, the bank provided a limited level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 48700 (Williamsport, PA)	Below	Below	Below

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN PENNSYLVANIA GROUP A (BRADFORD AND SULLIVAN COUNTIES)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN PENNSYLVANIA GROUP A (BRADFORD AND SULLIVAN COUNTIES)

A limited evaluation of M&T's performance in the Non-Metropolitan Pennsylvania Group A (Bradford and Sullivan Counties) area was conducted. M&T's assessment area consisted of the Bradford and Sullivan Counties in their entirety. The assessment area had a population of 68,609, with 62,228 in Bradford County and 6,381 in Sullivan County. The Non-Metropolitan Pennsylvania Group A assessment area had 2,408 business establishments according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Pennsylvania Group A (Bradford and Sullivan Counties)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	17.9
Moderate Income	0	0.0	0.0	18.4
Middle Income	14	87.5	84.7	20.6
Upper Income	2	12.5	15.3	43.1
Unknown	0	0.0	0.0	0.0
Total	**16**	**100.0**	**100.0**	**100.0**

M&T maintained three branches in the two counties, all of which were in middle-income census tracts. M&T ranked fourth in Non-Metropolitan Pennsylvania Group A out of six banks in deposit market share with 9.8% of all deposits. Within the State of Pennsylvania 1.5% of all M&T's deposits were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN PENNSYLVANIA GROUP A (BRADFORD AND SULLIVAN COUNTIES)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was consistent with this performance based primarily on community development lending. Lending activity and borrower distribution performance were good while geographic distribution was not evaluated as there were no LMI census tracts. M&T made six community development loans for $6.2 million in the six counties. Investment test performance was consistent with the High Satisfactory performance in the State of Pennsylvania as the bank made one LIHTC investment for $9.8 million and had outstanding balance of $557,498 thousand for prior period investments. In addition, a total of $2,500 in grants and donations were made to various organizations that primarily supported community service activity. Service test performance was below the High Satisfactory rating for the State of Pennsylvania, based on community development service activity. The bank's three branches in the assessment area were all located in middle-income census tracts; however, the assessment area did not contain LMI census tracts. M&T provided an adequate level of community development services in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan Pennsylvania Group A	Consistent	Consistent	Below

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN PENNSYLVANIA GROUP B (NORTHUMBERLAND, SCHUYKILL, SNYDER, AND UNION COUNTIES)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN PENNSYLVANIA GROUP B (NORTHUMBERLAND, SCHUYKILL, SNYDER, AND UNION COUNTIES)

A limited evaluation of M&T's performance in the Non-Metropolitan Pennsylvania Group B (Northumberland, Schuykill, Snyder, and Union Counties, PA) assessment area was conducted. M&T's assessment area consisted of Northumberland, Schuykill, Snyder, and Union Counties in Pennsylvania in their entirety. The assessment area had a population of 325,370, with 94,006, in Northumberland County, 146,360 in Schuykill County, 40,046 in Snyder County and 44,958 in Union County. The Non-Metropolitan Pennsylvania Group B area had 7,145 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Pennsylvania Group B (Northumberland, Schuykill, Snyder, Union Counties, PA)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	0	0.0	0.0	18.6
Moderate Income	13	15.9	10.5	18.9
Middle Income	54	65.9	72.1	21.1
Upper Income	11	13.4	17.3	41.4
Unknown	4	4.9	0.1	0.0
Total	**82**	**100.0**	**100.0**	**100.0**

M&T maintained 18 branches in the four counties. Five of the 18 branches were located in moderate-income census tracts. M&T ranked first in Non-Metropolitan Pennsylvania Group B out of 25 banks in deposit market share, with 13.4% of all deposits. Within the State of Pennsylvania, 7.7% of all M&T's deposits were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN PENNSYLVANIA GROUP B (NORTHUMBERLAND, SCHUYKILL, SNYDER, AND UNION COUNTIES)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance as lending activity and geographic distribution were good while borrower and distribution performance were adequate. M&T did not make any community development loans in the four counties. Investment test performance was below the High Satisfactory performance in the State of Pennsylvania, as the bank had no new investments or prior period investments. A total of $814,067 in grants and donations were made to various organizations. Additionally, Service test performance was consistent with the High Satisfactory rating for the State of Pennsylvania. The bank operated five (27.8%) of eighteen branches in moderate-income census tract. M&T provided a relatively high level of community development services.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan Pennsylvania Group B	Below	Below	Consistent

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN PENNSYLVANIA GROUP C (BEDFORD AND HUNTINGDON COUNTIES)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN PENNSYLVANIA GROUP C (BEDFORD AND HUNTINGDON COUNTIES)

A limited evaluation of M&T's performance in the Non-Metropolitan Pennsylvania Group C (Bedford and Huntingdon Counties) assessment area was conducted. M&T's assessment area consisted of all of Bedford County and one tract of Huntingdon County, which is adjacent to the bank's assessment area and branch locations. The assessment area had a population of 52,684, with 49,086 in Bedford County and 45,906 in Huntingdon. The Non-Metropolitan Pennsylvania Group C area had 2,386 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Pennsylvania Group C (Bedford and Huntingdon Counties, PA)				
Income Category	***Tract Distribution***		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	19.5
Moderate Income	0	0.0	0.0	17.6
Middle Income	11	91.7	93.0	24.1
Upper Income	1	8.3	7.0	38.7
Unknown	0	0.0	0.0	0.0
Total	**12**	**100.0**	**100.0**	**100.0**

M&T maintained three branches in the assessment area, all of which were in middle-income census tracts. M&T ranked sixth in Non-Metropolitan Pennsylvania Group C out of 16 banks in deposit market share with 7.5% of all deposits. Within the State of Pennsylvania, 1.2% of all M&T's deposits were in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN PENNSYLVANIA GROUP C (BEDFORD AND HUNTINGDON COUNTIES)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below with this performance, as lending activity was good while borrower distribution was adequate. Geographic distribution was not evaluated as there were no low- or moderate-income census tracts in the assessment area. M&T did not make any community development loans in the assessment area during the evaluation period. Investment test performance was consistent with the High Satisfactory performance in the State of Pennsylvania, as the bank made no new investments or prior period investments. A total of $69,885 in grants and donations were made to various organizations. Service test performance was rated below the High Satisfactory rating for the State of Pennsylvania. The service test conclusion was based primarily on the bank providing a limited level of community development services as there are no low- or moderate-income census tracts in the assessment area.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan Pennsylvania Group C	Below	Consistent	Below

NON-METROPOLITAN AREA

(LIMITED REVIEW)

NON-METROPOLITAN PENNSYLVANIA GROUP D (CLEARFIELD AND CLINTON COUNTIES)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN PENNSYLVANIA GROUP D (CLEARFIELD AND CLINTON COUNTIES)

A limited evaluation of M&T's performance in the Non-Metropolitan Pennsylvania Group D (Clearfield and Clinton Counties) assessment area was conducted. M&T's assessment area consisted of all of Clearfield and Clinton Counties in their entirety. The assessment area had a population of 120,957, with 81,343 in Clearfield County and 39,614 in Clinton County. The Non-Metropolitan Pennsylvania Group D assessment area had 4,433 business establishments, according to 2018 D&B information. Key demographics are listed on the chart below:

Assessment Area Demographics – Non-Metropolitan Pennsylvania Group D, (Clearfield and Clinton Counties, PA)				
	Tract Distribution		Percentage of Owner-Occupied Housing Units by Tract	Percentage of Families by Income Level
Income Category	#	%		
Low Income	1	3.4	0.6	19.9
Moderate Income	3	10.3	8.1	19.5
Middle Income	25	86.2	91.2	23.0
Upper Income	0	0.0	0.0	37.6
Unknown	0	0.0	0.0	0.0
Total	**29**	**100.0**	**100.0**	**100.0**

M&T maintained two branches in the two counties. Neither of the two branches are in LMI census tracts. M&T ranked ninth in Non-Metropolitan Pennsylvania Group D out of 14 banks in deposit market share, with 4.1% of all deposits. Within the State of Pennsylvania, 0.9% of all M&T's deposits are in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN PENNSYLVANIA GROUP D (CLEARFIELD AND CLINTON COUNTIES)

The overall lending test rating for the State of Pennsylvania is High Satisfactory. M&T's lending test performance in the assessment area was below this performance, as lending activity was good while borrower and geographic distribution were poor. M&T did not make any community development loans in the two counties during the evaluation period. Investment test performance was below the High Satisfactory performance in the State of Pennsylvania, as the bank did not have any qualified investments. A total of $1,000 in grants and donations were made to various organizations. Service test performance was also below the High Satisfactory rating for the State of Pennsylvania, as the bank did not have any branches in LMI census tracts and provided a limited level of community development activities.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix D. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Non-Metropolitan Pennsylvania Group D	Below	Below	Below

STATE OF VIRGINIA

CRA RATING FOR VIRGINIA[13]: SATISFACTORY

The Lending test is rated: Low Satisfactory

The Investment test is rated: Low Satisfactory

The Service test is rated: Low Satisfactory

The major factors supporting the rating include:

Lending Test:

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflected adequate penetration throughout the bank's assessment area.
- The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes.
- Exhibited an adequate record of serving the credit needs of low-income individuals and very small businesses.
- A leader in making community development loans.
- Made use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- Made an adequate level of qualified investments and grants, particularly those not routinely provided by investors, rarely in a leadership position.
- Made occasional use of innovative and/or complex investments to support community development initiatives.
- Exhibited adequate responsiveness to credit and community development needs.

[13] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institutions performance in that area.

Service Test:

- Delivery systems were reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area.
- Record of opening and closing of branches adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services did not vary in a way that inconvenienced the needs of its assessment area, particularly LMI geographies and/or LMI individuals.
- Provided a relatively high level of community development services.

SCOPE OF EXAMINATION

The evaluation of M&T's activities in the State of Virginia consisted of a full-scope review of MSA 40060 (Richmond, VA). Performance ratings for the State of Virginia were based solely on the evaluation conducted of MSA 40060 (Richmond, VA) assessment area's deposit concentrations, lending volumes, and branch office network. As shown in Exhibit I, activities in the State of Virginia made up less than 1.0% of the bank's deposits, less than 1.0% of branches, and less than 1.0% of the bank's loans.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA

As of December 31, 2018, M&T operated four branches in the State of Virginia. One of the four branches was in an LMI census tract. As detailed in Exhibit I, M&T maintained a deposit base of approximately $80 million in the State of Virginia. Total HMDA lending and small business lending was approximately 0.4% of M&T's total lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

Conclusions regarding M&T's performance in the State of Virginia with respect to the lending, investment, and service tests were based solely on performance in MSA 40060 (Richmond, VA). M&T's performance under the lending, investment and service tests is rated Low Satisfactory. Because the bank was determined to have met the needs of its assessment area, four community development loans totaling $27.8 million and five prior period investments totaling $3.9 million that benefitting the broader statewide and/or regional area the included the assessment area were considered. Specific comments regarding the lending, investment, and service tests are discussed below.

METROPOLITAN AREA

(FULL REVIEW)

MSA 40060 (RICHMOND, VA)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 40060 (RICHMOND, VA)

As of December 31, 2018, M&T operated four branches in MSA 40060 (Richmond, VA), representing less than 1.0% of the bank's overall branches. The MSA contained 0.4% of the bank's HMDA and small business loans. As of June 30, 2018, M&T's presence within the MSA is limited as the bank ranked 20th out of 29 banks in terms of deposit market share with less than 0.1% of deposits. The assessment area was evaluated under full scope procedures as it is the only assessment area in the State of Virginia.

Community Contacts

A contact was made with a local economic development official to discuss economic conditions impacting businesses. The contact stated that the economy in the Greater Richmond area is improving with the hopes of continued economic development through the attraction of new business activity. The contact stated the area needs more affordable housing and that certain areas are in need of revitalization. The contact also stated that there is a need for affordable transportation, as many low- and moderate- individuals that live in the city do not have access to employment opportunities in the surrounding counties.

Another contact in the area noted that the Richmond economy has fared better than other areas in Virginia and the country because of its diverse industry base. Affordable housing and financial education were noted as primary needs in the community. The contact indicated that many low- and moderate-individuals are having difficulty qualifying for mortgages due to an inability to absorb the costs of home ownership. Therefore, there is a need for financial education to prepare the prospective homeowners for the costs and responsibilities of home ownership.

PERFORMANCE CONTEXT

The following demographic and economic information was used to describe the assessment area and to evaluate the context in which M&T operates. The information was obtained from publicly available sources, including the 2010 Census, the 2015 ACS, the DOL, D&B, FFIEC, and HUD.

Demographic Characteristics

M&T's assessment area in MSA 40060 (Richmond, VA) consisted of Hanover County, Henrico County, and Richmond City, which is a portion of the MSA. According to the 2015 ACS the MSA 40060 population totaled 633,939. The assessment area contained 20.0% of the bank's State of

Virginia combined assessment area population, with the balance of the population located in the Washington D.C. multistate assessment area.

The Commonwealth of Virginia is a unique state regarding its political subdivision classification system. Cities such as Richmond and Petersburg are independent, meaning they are separate jurisdictions from counties. Residents of Virginia cities vote for city councils and mayors, pay city real estate and personal property taxes, and get business and professional licenses from city officials. Much of the area's low-income population resides in Richmond City. The greater Richmond area is part of MSA 40060 (Richmond, VA), which is in central Virginia, approximately 90 miles south of Washington DC.

Of the 153 census tracts in the assessment area, 24 or 15.7%, were low-income, 38 or 24.8%, were moderate-income, 45 or 29.4%, were middle-income, 44 or 28.8%, were upper-income and two or 1.3% were of unknown income.

Income Characteristics

The MSA 40060 (Richmond, VA) assessment area had 148,277 families, of which 23.3% (10.4% are below the poverty level) were considered low-income, 17.6% were moderate-income, 18.9% were middle-income, and 40.2% were upper-income. The FFIEC median family incomes for the counties comprising the assessment area as of the 2010 Census and 2015 ACS were as follows:

Median Family Income		
Metropolitan Division	**2010**	**2015**
Assessment Area	$69,341	$72,874
Hanover County	$87,756	$91,663
Henrico County	$75,140	$77,722
Richmond City	$47,364	$50,307
State of Virginia	$73,514	$78,390

Housing Characteristics

The 2015 ACS showed that MSA 40060 (Richmond, VA) had 273,186 housing units, of which 53.3% were owner-occupied and 38.0% are rental units. Of the available owner-occupied units, 26.6% were in LMI areas. In low-income census tracts, 59.0% of the housing units were rental units, 13.1% vacant, and 27.9% were owner-occupied. In moderate-income census tracts, 58.9% of the housing units were either rental or vacant, and 41.1% are owner-occupied.

The 2015 ACS showed that the median age of housing stock in the assessment area was 47 years old, with 19.9% of the stock built before 1950. The median age of housing stock was 59 years old in low- and 53 years old in moderate-income tracts, which indicated a possible need for home

improvement loans. According to the 2015 ACS, the median housing value in the assessment area was $221,875, with an affordability ratio of 25.1. The median gross rent in the assessment area was $970 per month. Within the assessment area, 48.8% of all renters had rental costs that exceeded 30% of their incomes.

Geographic Area	2010 Median Housing Value	2010 Affordability Ratio	2015 Median Housing Value	2015 Affordability Ratio	2010 Median Gross Rent	2015 Median Gross Rent	Percent of Change
Assessment Area	$235,123	23.0	$221,875	25.1	$881	$970	10.1%
Hanover County	$281,600	27.1	$255,400	30.8	$977	$1,044	6.9%
Henrico County	$230,000	26.1	$216,300	28.6	$940	$1,035	10.1%
Richmond City	$201,800	19.0	$193,700	21.0	$805	$896	11.3%
State of Virginia	$255,100	24.1	$245,000	26.5	$970	$1,116	15.1%

Labor, Employment and Economic Characteristics

Top employers in the Richmond area included Capital One, Virginia Commonwealth University Health System, HCA Virginia Health System, and Bon Secours Richmond Health System. The assessment area was also home to Fort Lee, the 3rd largest training site for the US Army. Fort Lee is designated as an Army Sustainment Center of Excellence, a focused training base for military supply, subsistence, maintenance, munitions, transportation, and more.

According to D&B data, the assessment area had a total of 35,060 businesses in 2018, of which 31,657 (90.3%) were small businesses with GAR of $1 million or less.

Unemployment rates dropped significantly from 2014 to 2018, evidencing improving economic conditions.

U.S. Department of Labor Annual Unemployment Rates					
Area	**2014**	**2015**	**2016**	**2017**	**2018**
MSA 40060 (Richmond, VA)	5.5	4.7	4.2	3.9	3.2
Hanover County	4.6	3.9	3.6	3.3	2.7
Henrico County	5.1	4.3	4.0	3.7	3.0
Richmond City	5.5	4.6	3.7	3.6	3.2
State of Virginia	5.2	4.4	4.1	3.7	3.0

Additional performance context data for this assessment area is provided in the subsequent MSA 40060 (Richmond, VA) Assessment Area Demographics table.

Assessment Area Demographics

Assessment Area: MSA 40060 (Richmond, VA) - 2018

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	15.7	16,442	11.1	5,871	35.7	34,479	23.3
Moderate-income	38	24.8	33,468	22.6	5,087	15.2	26,124	17.6
Middle-income	45	29.4	48,806	32.9	3,395	7	27,998	18.9
Upper-income	44	28.8	49,534	33.4	1,059	2.1	59,676	40.2
Unknown-income	2	1.3	27	0	9	33.3	0	0
Total Assessment Area	**153**	**100.0**	**148,277**	**100.0**	**15,421**	**10.4**	**148,277**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	34,700	9,689	6.7	27.9	20,459	59	4,552	13.1
Moderate-income	70,537	28,960	19.9	41.1	34,112	48.4	7,465	10.6
Middle-income	83,804	51,557	35.4	61.5	26,299	31.4	5,948	7.1
Upper-income	83,671	55,307	38	66.1	22,538	26.9	5,826	7
Unknown-income	474	51	0	10.8	304	64.1	119	25.1
Total Assessment Area	**273,186**	**145,564**	**100.0**	**53.3**	**103,712**	**38.0**	**23,910**	**8.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,451	7	2,164	6.8	269	8.9	18	4.7
Moderate-income	8,942	25.5	7,901	25	895	29.7	146	38.4
Middle-income	10,330	29.5	9,394	29.7	856	28.4	80	21.1
Upper-income	13,174	37.6	12,072	38.1	970	32.2	132	34.7
Unknown-income	153	0.4	126	0.4	23	0.8	4	1.1
Total Assessment Area	**35,050**	**100.0**	**31,657**	**100.0**	**3,013**	**100.0**	**380**	**100.0**
	Percentage of Total Businesses:			**90.3**		**8.6**		**1.1**

Based on 2015 FFIEC Census Data and 2018 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 40060 (RICHMOND, VA)

LENDING TEST

M&T's performance in MSA 40060 (Richmond, VA) is based on the following summary. The bank's lending levels reflected adequate responsiveness to the assessment area credit needs, geographic distribution of loans reflected adequate penetration throughout the assessment area for HMDA and small business loans, the distribution of borrowers, reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes, and the bank was a leader in making community development loans.

Greater weight was given to the analysis of HMDA loans in the analysis of geographic and borrower distribution based on loan volumes. Home improvement, multifamily, and small farm

lending were not evaluated, as lending volumes were insufficient for a separate analysis. However, multifamily lending was considered in the analysis of community development loans.

Lending Activity

M&T's lending levels reflected adequate responsiveness to assessment area credit needs in MSA 40060 (Richmond, VA). This conclusion was based on lending activity levels, market share performance and comparison with market aggregate data. Performance in HMDA-related lending was considered adequate while small business lending was also adequate. For the five-year evaluation period, lending activity totaled 716 loans consisting of 409 home purchase, 122 refinance, 29 home improvement and 156 small business loans. Lending activity declined on an annualized basis compared to the prior two-year evaluation period, during which lending activity totaled 413 loans, consisting of 198 home purchase, 138 refinance, four home improvement, and 73 small business loans. HMDA and small business volume for the evaluation period decreased 30.5% on an annualized basis overall compared to the previous evaluation period. This annualized decrease was driven by declines in home purchase (-16.4%), refinance (-64.6%), and small business (-16.2%) lending. Home improvement lending increased (190.0%) on an annualized basis, although home improvement lending volume was very limited. Analysis of the aggregate lending for the evaluation period indicated an annualized decrease in lending volume for the aggregate overall.

M&T's market shares of deposits and small business lending were generally stable overall. In 2018, M&T had a deposit market share of less than 0.1%, and lending market shares of 0.5% in home purchase, 0.4% in refinance lending, 0.1% in home improvement and 0.3% in small business lending. In comparison, the deposit market share in 2014 was less than 1.0%, with lending market shares of 0.9% in home purchase lending, 0.5% in refinance lending, 0.2% in home improvement lending, and 0.2 % in small business lending.

Geographic Distribution

M&T's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout MSA 40060 (Richmond, VA). Lending penetration in LMI-census tracts was good for refinance loans and adequate for home purchase and small business loans. Home improvement lending was not evaluated as the volume of lending was insufficient to analyze.

Analysis of Lending Gaps

The overall penetration of different income levels in 2018 was 40.5% of all census tracts in the assessment area when considering HMDA and small business lending. In 2018, HMDA and small business lending penetrated 16.7% of low-income census tracts and 31.6% of moderate-income census tracts. Overall, penetration of different income levels in 2017 and 2016 for HMDA and small business lending was slightly lower as the bank penetrated 34.0% of all census tracts in 2017

and 37.9% in 2016. Penetration of different income levels in 2014 and 2015 for HMDA and small business lending was slightly higher, as the data show 47.7% in 2015 and 49.7% in 2014.

MSA 40060 (Richmond, VA)			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2018			
Low	24	20	16.7%
Moderate	38	26	31.6%
Middle	45	23	48.9%
Upper	44	20	54.5%
Unknown	2	2	0.0%
Total Tracts	153	91	40.5%
2017			
Low	24	21	12.5%
Moderate	38	26	31.6%
Middle	45	30	33.3%
Upper	44	22	50.0%
Unknown	2	2	0.0%
Total Tracts	153	101	34.0%
2016			
Low	20	12	40.0%
Moderate	39	28	28.2%
Middle	44	28	36.4%
Upper	49	26	46.9%
Unknown	1	1	0.0%
Total Tracts	153	95	37.9%
2015			
Low	20	13	35.0%
Moderate	39	18	53.8%
Middle	44	23	47.7%
Upper	49	25	49.0%
Unknown	1	1	0.0%
Total Tracts	153	80	47.7%
2014			
Low	20	11	45.0%

Moderate	39	17	56.4%
Middle	44	23	47.7%
Upper	49	25	49.0%
Unknown	1	1	0.0%
Total Tracts	153	77	49.7%

Home Purchase

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area. In 2018, M&T did not make any home purchase loans in low-income census tracts, while 6.7% of all owner-occupied housing units were in low-income census tracts. Home purchase performance is below the aggregate, which made 7.3% by number and 4.6% by dollar in low-income census tracts. In 2018, the bank made 6.1% by number and 1.8% by dollar of home purchase loans in moderate-income census tracts. The bank's home purchase lending in moderate-income census tracts, by number, was below the 19.9% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 20.8% by number and 14.4% by dollar volume in moderate-income census tracts.

Home purchase performance in 2014-2017 was consistent with 2018 performance. In 2014 and 2016, the bank's home purchase lending in low-income census tracts exceeded the demographic and the aggregate. In 2015 and 2017, the bank's home purchase lending in low-income census tracts was below the demographic and the aggregate. In moderate-income census tracts in 2014, home purchase lending exceeded the demographic and the aggregate, while in 2015, the bank's home purchase lending was below the demographic and comparable to the aggregate. In 2016 and 2017, the bank's home purchase lending in moderate-income census tracts was below the demographic and the aggregate.

Refinance

The geographic distribution of refinance loans reflected good penetration throughout the assessment area. In 2018, the bank made 4.5% by number and 1.5% by dollar of refinance loans in low-income census tracts. The bank's refinance lending in low-income census tracts, by number, was below the 6.7% of owner-occupied housing units located in low-income census tracts and was below the aggregate, which made 5.5% by number and 3.4% by dollar in low-income census tracts. In 2018, the bank made 22.7% by number and 19.4% by dollar volume of refinance loans in moderate-income census tracts. The bank's refinance lending in moderate-income census tracts, by number, exceeded the 19.9% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate, which made 18.7% by number and 13.2% by dollar in moderate-income census tracts.

M&T's refinance lending in 2014-2017 was consistent with 2018. In 2014 and 2015, the bank's refinance lending in low-income census tracts exceeded the demographic and the aggregate. In 2016, the bank's refinance lending in low-income census tracts was below the demographic but was comparable to the aggregate. In 2017, the bank's refinance lending in low-income census tracts was below the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2014 and 2017 exceeded the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2015 was below the demographic and the aggregate. The bank's refinance lending in moderate-income census tracts in 2016 was below the demographic and comparable to the aggregate.

Small Business

The geographic distribution of small business loans reflected adequate penetration throughout the assessment area. In 2018, the bank made 4.7% by number and 1.7% by dollar of small business loans in low-income census tracts. The bank's small business lending in low-income census tracts was below the demographic of the assessment area where 7.0% of businesses were located in low-income census tracts; small business lending was also below the aggregate, which made 6.4% by number and 8.2% by dollar in low-income census tracts. In 2018, the bank made 16.3% by number and 19.6% by dollar of small business loans in moderate-income census tracts. The bank's small business lending was below the demographic of the assessment area, where 25.5% of businesses were in moderate-income census tracts, and was also below the aggregate, which made 22.8% by number and 24.9% by dollar in moderate-income census tracts.

M&T's small business lending in 2014-2017 was consistent with 2018 performance. The bank's small business lending in low-income census tracts in 2014 and 2016 was below the demographic and the aggregate, while in 2015 and 2017 exceeded the demographic and the aggregate. The bank's small business lending in moderate-income census tracts in 2014 and 2015 exceeded the aggregate and the demographic, but in 2016 and 2017, the bank's small business lending in moderate-income census tracts was below the demographic and the aggregate.

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The distribution of borrowers reflected, given the product lines offered, poor penetration among customers of different income levels and businesses of different sizes in the MSA 40060 (Richmond, VA) assessment area. Overall, HMDA lending to low- and moderate-income borrowers was poor and lending to businesses with gross annual revenues of $1 million or less was good.

Home Purchase

The distribution of borrowers reflected, given the product lines offered, very poor penetration among customers of different income levels for home purchase loans. The bank's 2018 lending to

low-income borrowers, which comprised 3.0% by number and 0.9% by dollar, was below the aggregate lending data, at 8.9% by number and 4.7% by dollar. Additionally, home purchase lending was also below the demographic figure, at 23.3%. The bank's lending to moderate-income borrowers, at 6.1% by number and 2.8% by dollar, was significantly below the aggregate lending data, at 22.2 % by number and 15.7% by dollar, and below the demographic figure, at 17.6 %.

M&T's lending to low-income borrowers for 2014-2017 exceeded the bank's 2018 lending performance. Lending to low-income borrowers was above the aggregate data lending but was below the demographic figure for 2014-2016. In 2017, the bank's lending was below the demographic and consistent with the aggregate figure. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending to moderate income borrowers was below the aggregate lending data for 2014-2017. For 2014 and 2015, the bank's lending was consistent with the demographic figure. In 2016 and 2017, the bank's lending was below the demographic figure.

Refinance

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels for refinance loans. The bank's 2018 lending to low-income borrowers, which comprised 31.8% by number and 22.5% by dollar, exceeded both the aggregate lending data, at 12.4% by number and 7.2% by dollar, and the demographic figure, at 23.3%. The bank's lending to moderate-income borrowers, at 13.6% by number and 13.5% by dollar, was below both the aggregate lending data at 20.4 % by number and 15.8% by dollar, and the demographic figure, at 17.6%.

M&T's lending to low-income borrowers for 2014-2017 was below the bank's 2018 lending performance. Lending to low-income borrowers was below both the aggregate lending data and the demographic figure as the bank made no loans during 2015-2017 and only two loans in 2014. The bank's lending to moderate-income borrowers in 2014-2017 was consistent with the 2018 performance. The bank's lending was below both the aggregate lending data, and the demographic figure from 2015-2017, while in 2014 the bank's lending was comparable to aggregate lending data and below the demographic figure.

Small Business

The distribution of borrowers reflected, given the product lines offered, good penetration among businesses of different sizes. In 2018, the bank originated 67.4% of loans by number and 46.5% by dollar to businesses with gross annual revenues of $1 million of less. The bank's lending exceeded aggregate lending data, at 49.0% by number and 35.3% by dollar, although it was significantly below the percentages of businesses in the assessment area with gross annual revenues of $1 million or less, at 90.3%. While the bank's loan volume was significantly below the demographic figure, the bank originated 74.4% of loans to assessment area businesses in increments of $100,000 or less, which are typically amounts needed by smaller business entities.

The bank's lending performance to small businesses from 2014 to 2017 was comparable to 2018 lending, as lending was above the aggregate but below the demographic figure in each year.

Community Development Lending

As shown in the table, M&T was a leader in making community development loans in MSA 40060 (Richmond, VA), with eight loan originations totaling $94.1 million, or 77.2% of the bank's Virginia's community development lending. M&T ranked first of five similarly-situated financial institutions when comparing annualized community development loans to deposits in the assessment area.

COMMUNITY DEVELOPMENT LENDING		
Purpose	**#**	**$('000s)**
Affordable Housing	5	79,749
Community Service	2	11,900
Revitalize & Stabilize	1	2,500
Total	**8**	**$94,149**

Community development lending also included four loans for $27.8 million in the State of Virginia for loans made outside of the assessment area benefiting the broader statewide or regional area including the assessment area, as M&T was responsive to the credit and community development needs of its assessment area.

Performance within the MSA was directed at affordable housing initiatives with 84.7% of community development activity.

Community development loans included:

- A $40.4 million construction loan for 345 affordable units in a moderate-income tract.
- A $14.5 million construction loan for a multi-family building in a low-income tract in which the majority of the units are affordable.
- A $12.7 million mortgage on a 250-unit apartment complex in a low-income tract in which 100% of the units are affordable.

INVESTMENT TEST

M&T's performance in MSA 40060 (Richmond, VA) is based on the following summary. The bank made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, and rarely in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives and exhibited adequate responsiveness to credit and community development needs of the assessment area.

During the evaluation period, the bank made 21 qualified investments totaling $17.6 million, in the State of Virginia. The investments consisted of $3.0 million current period investments and $10.7 million from prior period investments. The bank also had five investments for $3.8 million that benefited the broader statewide or regional area, including the assessment area. While M&T ranked first of five similarly-situated banks when comparing annualized community development investments to deposits within the MSA 40060 (Richmond, VA), M&T made minimal new investments for a nominal dollar amount over this evaluation period.

Qualified Community Development Investments by Purpose

October 1, 2014 – December 31, 2019

Area	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
MSA 40060 (Richmond, VA) - New	1	3,000	0	0	0	0	0	0	1	3,000
MSA 40060 (Richmond. VA) - Prior Period	15	10,690	0	0	0	0	0	0	15	10,690
Statewide	5	3,887	0	0	0	0	0	0	5	3,887
Total	21	17,577	0	0	0	0	0	0	21	17,577

Examples of the bank's investment activity that served the assessment area were:

- An investment in a LIHTC benefitting affordable housing for low-and moderate-income individuals in the assessment area.

- Prior period investments were all mortgage backed securities that benefited the assessment area in response for affordable housing.

In addition to the qualified investments, the bank made two grants or donations totaling $31,250 during the evaluation period benefiting community service activities.

SERVICE TEST

M&T provided a relatively high level of community development services in MSA 40060 (Richmond, VA). Delivery systems were reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area. Hours and services did not vary in a

way that inconvenienced the needs of the assessment area particularly LMI geographies and/or LMI individuals, and the bank provided a relatively high level of community development services. However, changes in branch locations adversely affected the accessibility of its delivery systems, particularly LMI geographies and/or LMI individuals.

Retail Services

M&T's delivery systems were reasonably accessible to geographies and individuals of different income levels in this assessment area. M&T operated four branches in this assessment area, one (25.0%) of which was located in a low-income area. This compared favorably to the 12.6% of the MSA's population residing in low-income areas and 24.9% of the population residing in moderate-income areas.

Alternative delivery systems did not enhance the bank's performance in this assessment area. M&T had two off-site ATM locations in the assessment area, neither of which were located in LMI areas.

Changes in branch locations adversely affected the accessibility of the bank's delivery systems. During the evaluation period, M&T closed one branch in a low-income tract in this assessment area.

Hours and services did not vary in a way that inconvenienced the needs of its assessment area, particularly LMI geographies and/or LMI individuals. None of the bank's branches in the assessment area had extended hours and all of the branches had Saturday hours, including the branch in the low-income tract.

Community Development Services

As shown in the table, M&T provided a relatively high level of community development services during the evaluation period. The bank provided the vast majority of its services through financial education and first-time home-buyer seminars targeted to LMI individuals. In addition, management and staff served as advisors and committee members to three nonprofit and community-based organizations in the Richmond assessment area.

COMMUNITY DEVELOPMENT SERVICES	
Purpose	**#**
Financial Education	148
Technical Assistance	1
Small Business Seminars	1
Board Participation	3
Total	**153**

CRA APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	January 1, 2014 – December 31, 2019 Lending: January 1, 2014 – December 31, 2018 Community development lending, qualified investments, and community development services: October 1, 2014 – December 31, 2019		
FINANCIAL INSTITUTION **Manufacturers and Traders Trust Company** One M & T Plaza* Buffalo, NY 14203			**PRODUCTS REVIEWED** • Home purchase • Multifamily • Refinance • Home Improvement • Small business • Community Development
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**		**PRODUCTS REVIEWED**
M&T Real Estate Trust	**Bank subsidiary**		• **Multifamily**
M&T Realty Capital Corporation	**Bank subsidiary**		• **Multifamily**
*** Branch Examined**			

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
MULTISTATE MSA			
MSA 10900 (Allentown-Bethlehem-Easton, PA- NJ)	Full Scope Procedures		
MSA 19060 (Cumberland, MD-WV)	Full Scope Procedures		
MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA)	Full Scope Procedures		
MSA 37980 (Philadelphia-Camden-Wilmington, PA- NJ-DE-MD)	Full Scope Procedures		
MSA 41540 (Salisbury MD-DE)	Full Scope Procedures		
MSA 47900 (Washington-Arlington-Alexandria, DC-VA-MD-WV)	Full Scope Procedures		
STATE OF CONNECTICUT			
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	Full Scope Procedures		
STATE OF DELAWARE			
MSA 20100 (Dover, DE)	Full Scope Procedures		
STATE OF FLORIDA			
MD 48424 (West Palm Beach-Boca Raton-Delray Beach, FL)	Full Scope Procedures		
MSA 38940 (Port St Lucie, FL)	Limited Scope Procedures		
MSA 42640 (Sebastian Vero Beach, FL)	Limited Scope Procedures		
STATE OF MARYLAND			
MSA 12580 (Baltimore-Columbia-Towson, MD)	Full Scope Procedures		
MSA 15680 (California-Lexington Park, MD)	Limited Scope Procedures		
MSA 25180 (Hagerstown-Martinsburg, MD-WV)	Limited Scope Procedures		
MD Nonmetropolitan Group A (Caroline, Dorchester, and Talbot Counties)	Limited Scope Procedures		
MD Nonmetropolitan Group B (Garrett County)	Limited Scope Procedures		
STATE OF MASSACHUSETTS			
MD 14454 (Boston, MA)	Full Scope Procedures		
STATE OF NEW JERSEY			
MSA 45940 (Trenton, NJ)	Full Scope Procedures		
MSA 12100 (Atlantic City-Hammonton, NJ)	Limited Scope Procedures		
STATE OF NEW YORK			
MSA 15380 (Buffalo-Cheektowaga-Niagara Falls, NY)	Full Scope Procedures		
MSA 40380 (Rochester, NY)	Full Scope Procedures		
MSA 45060 (Syracuse, NY)	Full Scope Procedures		
MSA 10580 (Albany-Schenectady-Troy, NY)	Full Scope Procedures		
MSA 13780 (Binghamton, NY)	Limited Scope Procedures		
MSA 21300 (Elmira, NY)	Limited Scope Procedures		
MSA 27060 (Ithaca, NY)	Limited Scope Procedures		
MSA 28740 (Kingston, NY)	Limited Scope Procedures		
MSA 46540 (Utica-Rome, NY)	Limited Scope Procedures		
MSA 48060 (Watertown-Ft. Drum)	Limited Scope Procedures		
NY Nonmetropolitan Group A (Allegany, Cattaraugus, Chautauqua, Genesee, Steuben, Wyoming.)	Limited Scope Procedures		
NY Nonmetropolitan Group B (Cayuga, Chenango, Cortland, Seneca)	Limited Scope Procedures		
NY Nonmetropolitan Group C (Sullivan County)	Limited Scope Procedures		

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
STATE OF PENNSYLVANIA			
MSA 49620 (York-Hanover, PA)	Full Scope Procedures		
MSA 25420 (Harrisburg-Carlisle, PA)	Full Scope Procedures		
MSA 42540 (Scranton—Wilkes-Barre, PA)	Full Scope Procedures		
MSA 11020 (Altoona, PA)	Full Scope Procedures		
MSA 39740 (Reading, PA)	Full Scope Procedures		
MSA 14100 (Bloomsburg-Berwick, PA)	Limited Scope Procedures		
MSA 16540 (Chambersburg-Waynesboro, PA)	Limited Scope Procedures		
MSA 20700 (East Stroudsburg, PA)	Limited Scope Procedures		
MSA 23900 (Gettysburg, PA)	Limited Scope Procedures		
MSA 29540 (Lancaster, PA)	Limited Scope Procedures		
MSA 30140 (Lebanon, PA)	Limited Scope Procedures		
MSA 44300 (State College, PA)	Limited Scope Procedures		
MSA 48700 (Williamsport, PA)	Limited Scope Procedures		
PA Nonmetropolitan Group A (Bradford-Sullivan Counties)	Limited Scope Procedures		
PA Nonmetropolitan Group B (Northumberland- Schuylkill—Snyder-Union, Counties)	Limited Scope Procedures		
PA Nonmetropolitan Group C (Bedford-One Tract of Huntingdon Counties)	Limited Scope Procedures		
PA Nonmetropolitan Group D (Clearfield and Clinton Counties)	Limited Scope Procedures		
STATE OF VIRGINIA			
MSA 40060 (Richmond, VA)	Full Scope Procedures		

CRA APPENDIX B
SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

State or Multistate Metropolitan Area	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Multistate MSA Ratings				
Multistate MSA 10900	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate MSA 19060	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate MSA 35620*	Outstanding	Outstanding	Outstanding	Outstanding
Multistate MSA 37980*	High Satisfactory	Outstanding	Outstanding	Outstanding
Multistate MSA 41540	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Multistate MSA 47900	Outstanding	High Satisfactory	High Satisfactory	Satisfactory
State Ratings				
State of Connecticut	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Delaware	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Florida	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Maryland*	High Satisfactory	Outstanding	Outstanding	Outstanding
State of Massachusetts	Low Satisfactory	Low Satisfactory	Needs to Improve	Satisfactory
State of New Jersey	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
State of New York*	High Satisfactory	Outstanding	Outstanding	Outstanding
State of Pennsylvania*	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Virginia	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
OVERALL	**High Satisfactory**	**Outstanding**	**Outstanding**	**Outstanding**

**These assessment areas and ratings are weighted more heavily due to the significant volume of the bank's activity.*

CRA APPENDIX C

GLOSSARY

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

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 metropolitan area/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

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 or services that (i) Support, enable or facilitate projects or activities that meet eligible uses" criteria described in Section 2301c of the Housing and Economic Recovery Act of 2008 ("HERA"), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Urban and Development in accordance with the Neighborhood Stabilization program ("NSP"); (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by the grantees; (iii) Benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or geographies outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

.

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.

(iv) activities that revitalize or stabilize low- or moderate-income geographies; or loans, investments or services that (i) Support, enable or facilitate projects or activities that meet eligible uses" criteria described in Section 2301c of the Housing and Economic Recovery Act of 2008 ("HERA"), Public Law 11 0-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Urban and

Development in accordance with the Neighborhood Stabilization program ("NSP"); (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by the grantees; (iii) Benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or geographies outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Family: A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Full review: Performance is analyzed considering performance context, quantitative factors, and qualitative factors.

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

income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

Household: A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

Limited-scope review: Performance is analyzed using only quantitative factors.

Low-income: Individual income that is less than 50% of the area median income, or a MFI that is less than 50%, in the case of geography.

Metropolitan Statistical Area ("MSA"): A geographic entity defined by the federal Office of Management and Budget for use by federal statistical agencies, based on the concept of a core area with a large population nucleus, plus adjacent communities having a high degree of economic and social integration with that core.

Metropolitan Division: A county or group of counties within a **Metropolitan Statistical Area** that contains a population of at least 2.5 million and represents an employment center(s) associated through commuting ties.

Middle-income: Individual income that is at least 80% and less than 120% of the area median income, or a MFI 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 MFI 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**.**

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

CRA APPENDIX D

Aggregate Loan Distribution Tables
2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Allentown-Bethlehem-Easton, PA-NJ (MSA 10900)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	4.2%	2.2%	1	3.8%	0.9%	8.1%	4.5%
Moderate	4	15.4%	9.2%	17.6%	11.8%	9	34.6%	28.2%	20.6%	15.4%
Middle	9	34.6%	35.1%	41.9%	39.8%	4	15.4%	13.0%	22.6%	21.8%
Upper	13	50.0%	55.6%	36.3%	46.2%	10	38.5%	53.0%	31.7%	41.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	7.7%	4.9%	17.0%	16.5%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	2.1%	1.8%	2.7%	1.4%	6	12.5%	11.2%	9.2%	5.0%
Moderate	13	27.1%	20.4%	12.7%	8.3%	8	16.7%	11.9%	18.2%	13.2%
Middle	18	37.5%	35.5%	43.6%	40.0%	11	22.9%	18.8%	24.2%	22.1%
Upper	16	33.3%	42.3%	41.0%	50.3%	21	43.8%	54.5%	37.7%	47.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.2%	3.5%	10.7%	12.3%
Total	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.6%	1.3%	1	6.3%	9.4%	7.4%	5.2%
Moderate	2	12.5%	20.0%	9.9%	8.3%	3	18.8%	15.9%	15.5%	11.8%
Middle	7	43.8%	32.1%	44.3%	40.0%	4	25.0%	13.6%	23.4%	19.8%
Upper	7	43.8%	47.9%	44.2%	50.4%	8	50.0%	61.1%	49.7%	55.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	7.9%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	30.8%	18.2%	0	0.0%	0.0%	0.6%	0.1%
Moderate	0	0.0%	0.0%	19.5%	12.6%	0	0.0%	0.0%	0.6%	0.1%
Middle	0	0.0%	0.0%	40.3%	41.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.4%	27.9%	0	0.0%	0.0%	4.4%	1.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	94.3%	98.5%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	1.1%	0.8%	3.8%	3.0%	8	8.9%	5.8%	8.3%	4.4%
Moderate	19	21.1%	14.7%	15.8%	11.0%	20	22.2%	20.5%	19.5%	13.9%
Middle	34	37.8%	35.1%	42.5%	39.9%	19	21.1%	15.5%	22.9%	20.5%
Upper	36	40.0%	49.5%	37.9%	46.1%	39	43.3%	54.3%	34.3%	41.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	4.4%	3.9%	15.0%	20.2%
Total	*90*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*90*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	3.2%	0.7%	5.1%	5.3%
Moderate	10	16.1%	9.3%	15.2%	15.0%
Middle	32	51.6%	31.9%	38.7%	39.5%
Upper	18	29.0%	58.0%	39.8%	39.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.7%
Total	*62*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*19*	30.6%	12.9%	47.1%	37.3%
	By Loan Size				
$100,000 or less	30	48.4%	5.8%	93.3%	37.4%
$100,001-$250,000	10	16.1%	9.4%	3.4%	15.1%
$250,001-$1 Million	22	35.5%	84.8%	3.3%	47.5%
Total	*62*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Allentown-Bethlehem-Easton, PA-NJ (MSA 10900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	5.0%	1.2%	3.6%	1.8%	3	7.5%	5.4%	8.7%	4.8%
Moderate	7	17.5%	15.5%	17.3%	11.3%	9	22.5%	18.4%	21.0%	16.0%
Middle	18	45.0%	40.3%	41.0%	37.8%	10	25.0%	27.6%	20.8%	20.7%
Upper	13	32.5%	42.9%	38.1%	49.1%	10	25.0%	33.5%	31.6%	41.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	20.0%	15.1%	17.9%	16.7%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	6.3%	2.1%	2.5%	1.2%	1	6.3%	1.2%	7.3%	4.0%
Moderate	2	12.5%	3.9%	12.7%	8.5%	2	12.5%	7.5%	16.1%	11.6%
Middle	8	50.0%	34.1%	43.8%	39.7%	3	18.8%	8.2%	21.1%	18.9%
Upper	5	31.3%	59.8%	41.0%	50.7%	5	31.3%	59.3%	36.3%	45.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	31.3%	23.8%	19.2%	20.4%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	22.2%	5.7%	2.8%	2.3%	1	11.1%	3.3%	7.7%	3.9%
Moderate	2	22.2%	5.7%	10.8%	7.4%	4	44.4%	18.0%	17.0%	10.8%
Middle	4	44.4%	86.9%	46.2%	41.9%	2	22.2%	22.1%	24.8%	21.0%
Upper	1	11.1%	1.6%	40.2%	48.4%	1	11.1%	2.5%	47.0%	59.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	11.1%	54.1%	3.6%	4.9%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	22.3%	11.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	28.5%	7.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	36.9%	36.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	12.3%	44.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	5	7.5%	1.6%	3.3%	2.4%	5	7.5%	3.7%	8.2%	4.2%
Moderate	13	19.4%	14.0%	15.6%	10.1%	15	22.4%	14.0%	19.2%	13.4%
Middle	30	44.8%	37.4%	42.2%	38.3%	15	22.4%	19.8%	21.1%	18.5%
Upper	19	28.4%	47.1%	38.9%	49.1%	16	23.9%	41.2%	33.8%	39.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	23.9%	21.3%	17.7%	24.1%
Total	*67*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*67*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	4	6.6%	2.2%	4.6%	4.7%
Moderate	10	16.4%	11.1%	15.2%	16.9%
Middle	23	37.7%	27.2%	39.3%	36.9%
Upper	24	39.3%	59.6%	39.6%	40.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.7%
Total	*61*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*26*	42.6%	31.3%	50.9%	39.6%
	By Loan Size				
$100,000 or less	15	24.6%	2.7%	93.3%	39.2%
$100,001-$250,000	15	24.6%	11.9%	3.3%	15.0%
$250,001-$1 Million	31	50.8%	85.4%	3.4%	45.8%
Total	*61*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Allentown-Bethlehem-Easton, PA-NJ (MSA 10900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	3.2%	1.7%	4	6.3%	2.4%	7.7%	4.0%
Moderate	6	9.5%	5.9%	16.2%	10.5%	18	28.6%	23.1%	20.2%	14.8%
Middle	30	47.6%	44.6%	43.0%	39.9%	9	14.3%	13.6%	22.3%	21.3%
Upper	27	42.9%	49.5%	37.5%	47.9%	21	33.3%	39.1%	33.7%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	17.5%	21.7%	16.1%	15.0%
Total	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	5.9%	1.7%	2.3%	1.3%	0	0.0%	0.0%	4.4%	2.3%
Moderate	3	17.6%	12.3%	11.6%	7.4%	1	5.9%	4.4%	12.5%	8.2%
Middle	6	35.3%	28.6%	42.6%	38.6%	3	17.6%	15.4%	19.3%	16.3%
Upper	7	41.2%	57.4%	43.5%	52.7%	2	11.8%	15.5%	39.5%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	64.7%	64.6%	24.3%	25.6%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.2%	1.2%	1	9.1%	3.5%	7.3%	3.0%
Moderate	4	36.4%	38.7%	15.6%	10.5%	4	36.4%	31.7%	15.5%	10.5%
Middle	6	54.5%	54.2%	45.8%	40.2%	4	36.4%	43.7%	22.9%	18.5%
Upper	1	9.1%	7.0%	36.3%	48.1%	2	18.2%	21.1%	50.0%	59.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.3%	8.1%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	19.3%	2.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	39.4%	25.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	30.3%	38.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	11.0%	34.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	1.1%	0.3%	2.9%	1.6%	5	5.4%	1.7%	6.4%	3.1%
Moderate	13	14.1%	6.5%	14.5%	10.2%	23	25.0%	17.5%	16.9%	11.4%
Middle	43	46.7%	48.6%	43.0%	39.3%	16	17.4%	12.6%	21.1%	18.1%
Upper	35	38.0%	44.6%	39.6%	48.8%	25	27.2%	30.7%	36.8%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	25.0%	37.5%	18.8%	23.9%
Total	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	1.3%	1.6%	4.7%	6.1%
Moderate	23	28.8%	26.7%	16.6%	16.2%
Middle	27	33.8%	26.2%	39.4%	38.9%
Upper	29	36.3%	45.5%	39.3%	38.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*80*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*37*	46.3%	25.9%	49.9%	38.9%
	By Loan Size				
$100,000 or less	27	33.8%	5.9%	92.9%	37.8%
$100,001-$250,000	18	22.5%	14.4%	3.5%	15.5%
$250,001-$1 Million	35	43.8%	79.7%	3.6%	46.7%
Total	*80*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Allentown-Bethlehem-Easton, PA-NJ (MSA 10900)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	2.3%	0.4%	3.0%	1.5%	2	4.5%	0.5%	7.6%	3.8%
Moderate	7	15.9%	3.3%	15.8%	9.7%	10	22.7%	4.5%	20.4%	14.7%
Middle	18	40.9%	11.2%	42.9%	38.9%	9	20.5%	5.5%	21.7%	20.5%
Upper	18	40.9%	85.1%	38.3%	49.9%	11	25.0%	8.5%	32.0%	43.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	27.3%	81.0%	18.3%	17.9%
Total	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.3%	1.2%	1	3.0%	0.4%	5.0%	2.6%
Moderate	3	9.1%	7.4%	11.9%	7.9%	2	6.1%	3.8%	12.3%	8.3%
Middle	14	42.4%	33.2%	43.0%	38.8%	0	0.0%	0.0%	19.0%	16.2%
Upper	16	48.5%	59.4%	42.8%	52.1%	9	27.3%	32.3%	37.4%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	63.6%	63.6%	26.3%	28.3%
Total	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.2%	1.9%	2	20.0%	5.1%	6.3%	2.6%
Moderate	5	50.0%	43.6%	16.5%	12.2%	2	20.0%	20.5%	17.9%	12.0%
Middle	3	30.0%	17.9%	46.8%	45.9%	4	40.0%	35.9%	26.7%	20.3%
Upper	2	20.0%	38.5%	34.4%	40.0%	1	10.0%	25.6%	45.7%	59.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	12.8%	3.4%	6.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	17.9%	14.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	40.0%	1.8%	33.3%	18.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	40.0%	6.2%	35.0%	42.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	20.0%	92.0%	13.7%	24.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	1.1%	0.2%	2.7%	2.7%	5	5.4%	0.4%	6.5%	3.0%
Moderate	17	18.5%	3.6%	14.4%	9.9%	14	15.2%	3.4%	16.9%	10.9%
Middle	37	40.2%	13.4%	43.2%	39.3%	13	14.1%	3.4%	20.9%	17.0%
Upper	37	40.2%	82.8%	39.7%	48.1%	21	22.8%	10.1%	34.9%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	42.4%	82.7%	20.9%	29.1%
Total	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	8	9.6%	6.8%	5.1%	6.2%
Moderate	14	16.9%	15.4%	16.0%	15.9%
Middle	31	37.3%	34.1%	40.6%	41.2%
Upper	30	36.1%	43.7%	36.9%	36.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.6%
Total	*83*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*31*	37.3%	20.9%	52.4%	40.7%
	By Loan Size				
$100,000 or less	27	32.5%	6.8%	92.0%	35.5%
$100,001-$250,000	24	28.9%	17.8%	4.0%	16.2%
$250,001-$1 Million	32	38.6%	75.5%	4.1%	48.2%
Total	*83*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Allentown-Bethlehem-Easton, PA-NJ (MSA 10900)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	3.3%	1.8%	1	1.5%	0.4%	6.6%	3.3%
Moderate	12	17.6%	10.3%	15.5%	9.8%	7	10.3%	6.1%	19.7%	14.3%
Middle	29	42.6%	39.0%	42.7%	39.6%	5	7.4%	6.5%	20.5%	19.3%
Upper	27	39.7%	50.7%	38.5%	48.8%	14	20.6%	22.2%	34.5%	45.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	41	60.3%	64.7%	18.6%	17.6%
Total	*68*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*68*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	2.6%	2.6%	3.4%	2.0%	0	0.0%	0.0%	7.4%	4.4%
Moderate	13	34.2%	22.1%	14.4%	9.8%	1	2.6%	1.6%	15.1%	11.0%
Middle	10	26.3%	28.4%	43.4%	40.1%	3	7.9%	5.6%	19.5%	17.2%
Upper	14	36.8%	46.9%	38.8%	48.1%	5	13.2%	16.0%	38.1%	45.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	76.3%	76.9%	20.0%	21.9%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.4%	2.1%	0	0.0%	0.0%	9.2%	4.1%
Moderate	5	55.6%	43.3%	17.2%	12.9%	3	33.3%	24.4%	19.8%	10.6%
Middle	3	33.3%	34.4%	47.8%	39.3%	4	44.4%	50.0%	25.2%	22.3%
Upper	1	11.1%	22.2%	32.6%	45.7%	2	22.2%	25.6%	40.8%	53.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.9%	9.2%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	14.7%	2.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	48.4%	35.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	30.5%	50.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.3%	11.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	0.9%	0.8%	3.3%	1.9%	1	0.9%	0.3%	7.1%	3.5%
Moderate	30	26.1%	14.3%	15.4%	11.5%	11	9.6%	4.7%	18.0%	12.2%
Middle	42	36.5%	35.6%	43.3%	40.4%	12	10.4%	6.4%	20.5%	17.4%
Upper	42	36.5%	49.3%	37.9%	46.2%	21	18.3%	20.3%	36.2%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	70	60.9%	68.3%	18.3%	24.0%
Total	*115*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*115*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	9	8.4%	10.4%	4.8%	5.9%
Moderate	20	18.7%	18.6%	16.1%	16.5%
Middle	46	43.0%	35.7%	39.1%	39.9%
Upper	32	29.9%	35.2%	38.3%	37.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.7%	0.7%
Total	*107*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*37*	34.6%	15.3%	48.0%	39.1%
	By Loan Size				
$100,000 or less	53	49.5%	13.7%	91.9%	35.3%
$100,001-$250,000	25	23.4%	18.9%	4.1%	17.1%
$250,001-$1 Million	29	27.1%	67.4%	4.0%	47.6%
Total	*107*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Cumberland, MD-WV (MSA 19060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.5%	4.7%
Moderate	1	7.7%	4.8%	12.6%	10.3%	6	46.2%	40.4%	18.2%	13.4%
Middle	4	30.8%	23.1%	68.2%	69.1%	2	15.4%	12.5%	20.6%	19.9%
Upper	8	61.5%	72.1%	19.1%	20.6%	4	30.8%	35.9%	29.2%	38.7%
Unknown	0	0.0%	0.0%	0.1%	0.0%	1	7.7%	11.1%	23.5%	23.3%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	5	10.2%	5.4%	9.6%	6.1%
Moderate	4	8.2%	9.5%	6.6%	5.6%	8	16.3%	10.8%	16.5%	11.7%
Middle	37	75.5%	73.9%	73.2%	72.8%	14	28.6%	31.2%	26.2%	24.9%
Upper	8	16.3%	16.6%	20.2%	21.6%	19	38.8%	43.8%	42.0%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	6.1%	8.8%	5.7%	7.4%
Total	*49*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*49*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.4%	1.6%
Moderate	2	9.1%	6.1%	7.0%	4.8%	5	22.7%	18.4%	18.6%	10.8%
Middle	16	72.7%	84.2%	71.3%	79.0%	5	22.7%	24.1%	20.9%	20.8%
Upper	4	18.2%	9.8%	21.7%	16.3%	12	54.5%	57.5%	52.7%	63.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.3%	3.4%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.1%	41.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	66.7%	38.9%	0	0.0%	0.0%	11.1%	4.1%
Upper	0	0.0%	0.0%	22.2%	19.7%	0	0.0%	0.0%	33.3%	18.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	55.6%	77.9%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	6.0%	3.4%	8.6%	4.9%
Moderate	7	8.3%	7.9%	10.2%	9.1%	19	22.6%	18.3%	17.6%	12.7%
Middle	57	67.9%	64.8%	70.1%	70.1%	21	25.0%	26.1%	22.4%	21.2%
Upper	20	23.8%	27.3%	19.7%	20.7%	35	41.7%	44.3%	35.1%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	4.8%	7.9%	16.3%	18.7%
Total	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	6.3%	1.4%	11.2%	11.0%
Middle	67	69.8%	71.0%	65.8%	65.1%
Upper	23	24.0%	27.5%	21.7%	23.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.8%
Total	*96*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*60*	62.5%	33.4%	43.2%	29.6%
	By Loan Size				
$100,000 or less	73	76.0%	21.2%	92.3%	37.8%
$100,001-$250,000	12	12.5%	23.3%	3.8%	15.9%
$250,001-$1 Million	11	11.5%	55.5%	3.9%	46.3%
Total	*96*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Cumberland, MD-WV (MSA 19060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	9.5%	5.2%	5.2%	2.6%
Moderate	0	0.0%	0.0%	11.5%	9.3%	8	38.1%	39.9%	19.9%	15.0%
Middle	18	85.7%	71.0%	67.4%	68.0%	3	14.3%	11.9%	21.1%	20.8%
Upper	3	14.3%	29.0%	21.0%	22.7%	4	19.0%	35.4%	25.1%	33.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	19.0%	7.5%	28.7%	27.9%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.9%	2.9%
Moderate	0	0.0%	0.0%	9.9%	7.8%	4	40.0%	34.3%	16.6%	10.4%
Middle	10	100.0%	100.0%	72.1%	73.9%	2	20.0%	22.1%	20.1%	17.9%
Upper	0	0.0%	0.0%	18.0%	18.3%	4	40.0%	43.6%	44.3%	51.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.1%	17.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	4	14.8%	13.6%	9.7%	2.2%
Moderate	5	18.5%	16.8%	8.9%	9.5%	8	29.6%	25.0%	18.6%	12.1%
Middle	19	70.4%	76.1%	73.7%	73.0%	7	25.9%	29.3%	23.7%	10.9%
Upper	3	11.1%	7.1%	16.9%	16.4%	7	25.9%	29.3%	44.1%	65.1%
Unknown	0	0.0%	0.0%	0.4%	1.1%	1	3.7%	2.7%	3.8%	9.8%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	12.5%	15.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	25.0%	33.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	62.5%	51.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	6	10.3%	3.7%	5.9%	2.6%
Moderate	5	8.6%	0.9%	10.7%	8.9%	20	34.5%	37.0%	18.6%	13.2%
Middle	47	81.0%	82.0%	69.5%	69.5%	12	20.7%	16.6%	21.0%	19.2%
Upper	6	10.3%	17.1%	19.7%	21.5%	15	25.9%	38.1%	33.3%	40.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	8.6%	4.5%	21.1%	24.9%
Total	*58*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*58*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	19.2%	9.3%	9.9%	12.3%
Middle	29	55.8%	62.3%	60.4%	50.5%
Upper	13	25.0%	28.4%	26.9%	36.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.8%	1.0%
Total	*52*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*33*	63.5%	47.8%	41.0%	36.9%
	By Loan Size				
$100,000 or less	37	71.2%	28.6%	91.3%	34.6%
$100,001-$250,000	10	19.2%	30.5%	4.5%	16.6%
$250,001-$1 Million	5	9.6%	40.9%	4.2%	48.8%
Total	*52*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Cumberland, MD-WV (MSA 19060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	3	13.6%	9.4%	8.6%	4.7%
Moderate	3	13.6%	11.9%	14.3%	12.9%	2	9.1%	6.5%	18.9%	14.2%
Middle	17	77.3%	74.4%	66.3%	66.5%	3	13.6%	10.7%	21.6%	21.8%
Upper	2	9.1%	13.8%	19.2%	20.5%	7	31.8%	48.8%	26.7%	36.2%
Unknown	0	0.0%	0.0%	0.2%	0.2%	7	31.8%	24.6%	24.2%	23.1%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	3.7%	6.6%	3.9%
Moderate	3	16.7%	20.1%	15.5%	15.5%	0	0.0%	0.0%	14.6%	10.0%
Middle	10	55.6%	51.7%	64.5%	60.5%	2	11.1%	9.2%	23.8%	19.2%
Upper	5	27.8%	28.2%	19.5%	23.4%	5	27.8%	35.7%	36.9%	44.1%
Unknown	0	0.0%	0.0%	0.6%	0.6%	10	55.6%	51.4%	18.1%	22.7%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	8	25.8%	18.3%	12.7%	3.0%
Moderate	5	16.1%	21.8%	13.1%	13.1%	9	29.0%	19.3%	21.1%	11.0%
Middle	21	67.7%	58.9%	72.3%	67.4%	8	25.8%	37.6%	23.0%	24.8%
Upper	5	16.1%	19.3%	14.6%	19.5%	6	19.4%	24.9%	40.4%	56.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	4.5%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	19.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	75.0%	80.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	12	16.9%	7.1%	8.2%	4.1%
Moderate	11	15.5%	16.2%	14.7%	14.3%	11	15.5%	4.0%	17.3%	11.6%
Middle	48	67.6%	63.0%	66.2%	65.1%	13	18.3%	11.2%	22.5%	19.6%
Upper	12	16.9%	20.8%	18.8%	20.4%	18	25.4%	41.5%	32.1%	37.8%
Unknown	0	0.0%	0.0%	0.3%	0.3%	17	23.9%	36.1%	19.9%	26.9%
Total	*71*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*71*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	20	28.2%	28.8%	21.6%	19.7%
Middle	33	46.5%	50.1%	55.7%	60.6%
Upper	18	25.4%	21.1%	19.8%	18.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.0%	0.9%
Total	*71*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*44*	62.0%	30.5%	41.9%	31.6%
	By Loan Size				
$100,000 or less	48	67.6%	21.2%	92.4%	37.9%
$100,001-$250,000	15	21.1%	29.7%	4.2%	20.1%
$250,001-$1 Million	8	11.3%	49.1%	3.4%	42.0%
Total	*71*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Cumberland, MD-WV (MSA 19060)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	3	16.7%	6.5%	6.7%	3.5%
Moderate	5	27.8%	13.0%	17.0%	15.4%	2	11.1%	7.1%	16.9%	12.4%
Middle	8	44.4%	41.1%	60.7%	56.7%	4	22.2%	14.5%	22.4%	20.6%
Upper	5	27.8%	45.9%	21.3%	27.0%	8	44.4%	69.3%	31.7%	42.3%
Unknown	0	0.0%	0.0%	1.0%	0.9%	1	5.6%	2.6%	22.3%	21.2%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.9%	2.6%
Moderate	1	14.3%	10.8%	15.3%	14.9%	1	14.3%	13.0%	11.8%	7.6%
Middle	3	42.9%	29.9%	65.8%	63.7%	0	0.0%	0.0%	18.9%	16.0%
Upper	3	42.9%	59.3%	18.8%	21.3%	4	57.1%	70.1%	47.2%	52.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%	2	28.6%	16.9%	17.2%	20.9%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	17.2%	8.2%	7.4%	2.0%
Moderate	4	13.8%	14.3%	12.8%	19.4%	9	31.0%	21.3%	15.7%	8.8%
Middle	18	62.1%	64.7%	71.1%	56.8%	4	13.8%	9.6%	21.9%	19.3%
Upper	7	24.1%	21.0%	16.1%	23.8%	10	34.5%	45.8%	51.2%	66.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.4%	15.2%	3.7%	3.4%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	22.2%	40.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	77.8%	59.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	8	14.8%	4.6%	6.1%	3.0%
Moderate	10	18.5%	12.4%	15.8%	15.7%	12	22.2%	10.2%	14.7%	10.1%
Middle	29	53.7%	39.8%	64.1%	59.6%	8	14.8%	9.6%	20.9%	18.4%
Upper	15	27.8%	47.8%	19.5%	24.2%	22	40.7%	67.4%	40.1%	47.2%
Unknown	0	0.0%	0.0%	0.5%	0.5%	4	7.4%	8.1%	18.3%	21.2%
Total	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	18	25.7%	22.2%	21.0%	21.1%
Middle	35	50.0%	46.3%	56.2%	57.0%
Upper	17	24.3%	31.5%	18.1%	20.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	4.8%	1.7%
Total	*70*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*45*	64.3%	61.5%	36.6%	38.7%
	By Loan Size				
$100,000 or less	37	52.9%	13.0%	89.7%	33.4%
$100,001-$250,000	20	28.6%	29.7%	6.4%	24.5%
$250,001-$1 Million	13	18.6%	57.3%	3.8%	42.2%
Total	*70*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Cumberland, MD-WV (MSA 19060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.5%	2.2%	9.2%	5.3%
Moderate	1	4.5%	4.3%	17.3%	15.0%	4	18.2%	11.7%	18.7%	14.5%
Middle	16	72.7%	67.9%	62.4%	59.6%	6	27.3%	28.1%	23.6%	23.0%
Upper	5	22.7%	27.8%	20.2%	25.4%	5	22.7%	30.6%	25.4%	34.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	27.3%	27.4%	23.1%	22.6%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	10.7%	9.8%	5.1%
Moderate	0	0.0%	0.0%	16.2%	15.8%	1	8.3%	11.0%	14.7%	10.9%
Middle	6	50.0%	42.6%	67.0%	66.1%	1	8.3%	7.2%	21.2%	18.4%
Upper	6	50.0%	57.4%	16.5%	17.8%	4	33.3%	44.5%	40.0%	50.2%
Unknown	0	0.0%	0.0%	0.3%	0.3%	4	33.3%	26.6%	14.4%	15.5%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	6	20.0%	12.9%	10.4%	4.8%
Moderate	8	26.7%	31.7%	15.0%	11.9%	8	26.7%	18.3%	16.5%	12.3%
Middle	20	66.7%	65.3%	67.7%	62.5%	6	20.0%	14.9%	25.0%	17.7%
Upper	2	6.7%	3.0%	17.3%	25.6%	10	33.3%	54.0%	45.0%	61.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.1%	3.3%
Total	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.3%	11.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	57.1%	67.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	28.6%	20.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	9	14.1%	5.8%	9.6%	5.0%
Moderate	9	14.1%	4.0%	16.6%	15.0%	13	20.3%	11.8%	16.9%	12.6%
Middle	42	65.6%	58.6%	64.8%	62.5%	13	20.3%	19.9%	22.8%	20.3%
Upper	13	20.3%	37.3%	18.5%	22.4%	19	29.7%	36.7%	33.4%	40.8%
Unknown	0	0.0%	0.0%	0.1%	0.1%	10	15.6%	25.8%	17.5%	21.3%
Total	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	15.7%	4.9%	20.0%	19.8%
Middle	30	58.8%	56.4%	56.1%	60.8%
Upper	13	25.5%	38.7%	17.9%	17.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	6.1%	1.6%
Total	*51*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*31*	60.8%	48.8%	35.3%	35.5%
	By Loan Size				
$100,000 or less	37	72.5%	27.1%	92.9%	41.0%
$100,001-$250,000	9	17.6%	28.3%	4.6%	23.5%
$250,001-$1 Million	5	9.8%	44.6%	2.5%	35.5%
Total	*51*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: New York-Newark-Jersey City, NY-NJ-PA (MSA 35620)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	137	9.0%	8.8%	4.1%	3.4%	75	4.9%	1.7%	2.8%	1.4%
Moderate	354	23.1%	19.8%	14.3%	12.2%	370	24.2%	13.7%	13.0%	7.5%
Middle	630	41.2%	40.6%	34.7%	29.7%	447	29.2%	24.2%	20.7%	15.4%
Upper	408	26.7%	30.6%	46.8%	54.6%	600	39.2%	56.3%	48.5%	60.8%
Unknown	1	0.1%	0.1%	0.1%	0.1%	38	2.5%	4.0%	15.0%	15.0%
Total	*1,530*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,530*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	18	2.1%	2.1%	3.7%	3.8%	51	5.8%	3.0%	4.6%	2.3%
Moderate	96	11.0%	10.1%	12.7%	12.0%	123	14.1%	7.5%	11.8%	6.7%
Middle	310	35.5%	28.0%	34.0%	28.4%	175	20.0%	14.3%	20.0%	14.5%
Upper	449	51.4%	59.8%	49.5%	55.6%	489	56.0%	71.8%	51.6%	61.6%
Unknown	0	0.0%	0.0%	0.1%	0.1%	35	4.0%	3.3%	11.9%	14.9%
Total	*873*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*873*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	14	2.2%	1.4%	2.1%	2.9%	31	4.9%	1.8%	3.0%	1.8%
Moderate	82	12.8%	9.0%	9.3%	9.7%	83	13.0%	6.8%	9.5%	5.8%
Middle	213	33.3%	30.0%	33.5%	28.0%	145	22.7%	13.8%	18.9%	13.3%
Upper	330	51.6%	59.5%	55.1%	59.3%	366	57.3%	73.0%	64.4%	71.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	2.2%	4.6%	4.2%	7.4%
Total	*639*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*639*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	3	7.0%	10.2%	20.9%	16.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	18.6%	39.9%	32.9%	26.6%	0	0.0%	0.0%	0.1%	0.0%
Middle	17	39.5%	27.7%	19.2%	19.5%	0	0.0%	0.0%	0.1%	0.0%
Upper	15	34.9%	22.2%	26.7%	36.7%	0	0.0%	0.0%	0.4%	0.0%
Unknown	0	0.0%	0.0%	0.2%	0.7%	43	100.0%	100.0%	99.3%	99.9%
Total	*43*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*43*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	172	5.6%	8.1%	4.1%	6.3%	157	5.1%	1.1%	3.4%	1.4%
Moderate	540	17.5%	27.9%	13.7%	15.1%	576	18.7%	5.6%	12.1%	5.7%
Middle	1,170	37.9%	31.7%	34.2%	27.2%	767	24.9%	10.1%	20.0%	11.9%
Upper	1,202	39.0%	32.1%	48.0%	51.2%	1,455	47.2%	31.1%	50.0%	48.5%
Unknown	1	0.0%	0.0%	0.1%	0.2%	130	4.2%	52.2%	14.6%	32.6%
Total	*3,085*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3,085*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	87	4.5%	2.7%	7.3%	6.9%
Moderate	277	14.4%	11.7%	16.0%	15.1%
Middle	605	31.4%	32.1%	27.2%	26.2%
Upper	945	49.1%	52.7%	47.8%	49.3%
Unknown	10	0.5%	0.9%	1.1%	2.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.5%
Total	*1,924*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1,049*	54.5%	27.8%	40.7%	27.8%
	By Loan Size				
$100,000 or less	1,288	66.9%	12.8%	95.2%	45.4%
$100,001-$250,000	191	9.9%	10.4%	2.6%	14.7%
$250,001-$1 Million	445	23.1%	76.8%	2.2%	39.9%
Total	*1,924*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: New York-Newark-Jersey City, NY-NJ-PA (MSA 35620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	184	7.7%	6.2%	3.7%	3.0%	87	3.6%	1.2%	2.4%	1.0%
Moderate	589	24.7%	19.0%	13.9%	11.3%	525	22.0%	11.6%	12.2%	6.5%
Middle	1,057	44.3%	38.6%	34.5%	28.4%	741	31.1%	23.7%	20.9%	14.7%
Upper	548	23.0%	35.9%	47.8%	57.1%	817	34.3%	43.6%	51.2%	64.4%
Unknown	6	0.3%	0.2%	0.1%	0.1%	214	9.0%	20.0%	13.3%	13.3%
Total	*2,384*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,384*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	43	6.1%	3.9%	3.6%	3.3%	11	1.6%	0.7%	3.5%	1.7%
Moderate	147	20.9%	16.7%	13.1%	11.5%	73	10.4%	6.2%	10.1%	5.9%
Middle	237	33.6%	27.3%	34.6%	29.1%	146	20.7%	14.1%	19.7%	14.6%
Upper	278	39.4%	52.1%	48.5%	56.0%	333	47.2%	57.4%	50.9%	61.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%	142	20.1%	21.6%	15.8%	15.9%
Total	*705*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*705*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	10	5.8%	5.5%	3.1%	3.1%	26	15.1%	1.4%	4.7%	1.7%
Moderate	33	19.2%	8.6%	12.7%	11.8%	34	19.8%	5.6%	11.4%	5.5%
Middle	68	39.5%	24.6%	35.3%	27.2%	48	27.9%	18.2%	21.0%	14.0%
Upper	61	35.5%	61.3%	48.8%	57.9%	60	34.9%	67.4%	57.3%	67.6%
Unknown	0	0.0%	0.0%	0.1%	0.1%	4	2.3%	7.4%	5.6%	11.1%
Total	*172*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*172*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	5	7.8%	4.5%	22.1%	15.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	15.6%	14.1%	32.1%	37.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	14	21.9%	39.9%	19.4%	17.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	34	53.1%	39.7%	26.1%	28.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	1	1.6%	1.8%	0.3%	0.6%	64	100.0%	100.0%	100.0%	100.0%
Total	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	242	7.3%	5.3%	3.9%	4.8%	124	3.7%	0.7%	2.8%	1.1%
Moderate	779	23.4%	16.9%	13.8%	15.0%	632	19.0%	6.7%	11.4%	5.5%
Middle	1,376	41.4%	37.2%	34.4%	27.1%	935	28.1%	14.0%	20.3%	12.7%
Upper	921	27.7%	39.9%	47.8%	52.9%	1,210	36.4%	30.9%	50.8%	55.0%
Unknown	7	0.2%	0.7%	0.1%	0.2%	424	12.8%	47.7%	14.7%	25.8%
Total	*3,325*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3,325*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	28	2.4%	1.7%	7.7%	6.8%
Moderate	114	9.7%	10.2%	16.3%	14.7%
Middle	416	35.3%	36.6%	27.1%	26.5%
Upper	613	51.9%	50.6%	47.2%	49.6%
Unknown	9	0.8%	0.8%	1.0%	1.8%
Tract Unknown	0	0.0%	0.0%	0.8%	0.5%
Total	*1,180*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*569*	48.2%	30.4%	48.8%	32.6%
	By Loan Size				
$100,000 or less	493	41.8%	7.1%	95.1%	44.3%
$100,001-$250,000	228	19.3%	12.3%	2.5%	13.8%
$250,001-$1 Million	459	38.9%	80.6%	2.3%	41.8%
Total	*1,180*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: New York-Newark-Jersey City, NY-NJ-PA (MSA 35620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	77	3.5%	2.7%	2.9%	2.6%	71	3.2%	0.7%	2.4%	1.0%
Moderate	455	20.5%	16.6%	13.5%	11.1%	475	21.4%	9.2%	12.2%	6.5%
Middle	988	44.6%	37.7%	33.6%	28.3%	672	30.3%	17.7%	21.1%	14.8%
Upper	696	31.4%	43.1%	50.0%	58.0%	708	31.9%	33.2%	50.9%	63.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	290	13.1%	39.2%	13.5%	14.2%
Total	*2,216*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,216*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	28	2.8%	2.6%	2.3%	2.1%	13	1.3%	0.5%	2.4%	1.1%
Moderate	123	12.5%	9.0%	10.5%	8.8%	66	6.7%	3.6%	7.9%	4.4%
Middle	346	35.2%	28.4%	30.7%	26.1%	129	13.1%	9.1%	16.8%	12.1%
Upper	487	49.5%	60.0%	56.5%	62.9%	353	35.9%	43.1%	54.0%	63.7%
Unknown	0	0.0%	0.0%	0.0%	0.1%	423	43.0%	43.8%	18.9%	18.7%
Total	*984*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*984*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	11	8.3%	0.3%	2.2%	1.9%	18	13.5%	0.4%	3.8%	1.0%
Moderate	14	10.5%	2.5%	11.7%	9.2%	24	18.0%	1.0%	11.0%	4.5%
Middle	56	42.1%	6.4%	33.0%	23.4%	21	15.8%	1.3%	20.4%	13.4%
Upper	52	39.1%	90.7%	53.1%	65.5%	51	38.3%	6.5%	60.0%	69.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	14.3%	90.7%	4.8%	11.4%
Total	*133*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*133*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	2.0%	0.2%	18.2%	13.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	35	35.0%	29.7%	36.1%	29.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	19	19.0%	12.8%	20.9%	21.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	44	44.0%	57.3%	24.7%	35.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	100	100.0%	100.0%	100.0%	100.0%
Total	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	118	3.4%	1.4%	2.8%	3.7%	102	3.0%	0.3%	2.4%	0.9%
Moderate	627	18.3%	20.6%	12.4%	12.5%	565	16.5%	4.0%	10.3%	4.9%
Middle	1,409	41.0%	23.9%	32.2%	26.6%	822	23.9%	7.9%	19.1%	12.0%
Upper	1,279	37.3%	54.1%	52.5%	57.1%	1,112	32.4%	18.6%	51.9%	55.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	832	24.2%	69.2%	16.3%	26.2%
Total	*3,433*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3,433*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	34	2.5%	2.3%	6.8%	6.2%
Moderate	160	11.9%	11.8%	16.6%	15.1%
Middle	492	36.7%	38.5%	28.6%	27.8%
Upper	636	47.4%	46.1%	46.9%	49.0%
Unknown	19	1.4%	1.4%	1.1%	2.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*1,341*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*692*	51.6%	30.4%	43.1%	28.0%
	By Loan Size				
$100,000 or less	601	44.8%	7.3%	95.6%	46.0%
$100,001-$250,000	239	17.8%	11.6%	2.3%	13.5%
$250,001-$1 Million	501	37.4%	81.1%	2.1%	40.5%
Total	*1,341*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: New York-Newark-Jersey City, NY-NJ-PA (MSA 35620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	90	4.5%	2.6%	2.8%	2.4%	114	5.7%	0.8%	2.7%	1.2%
Moderate	423	21.0%	13.5%	13.1%	10.6%	429	21.3%	6.2%	12.3%	6.5%
Middle	863	42.9%	19.9%	33.0%	27.6%	483	24.0%	9.5%	19.8%	13.7%
Upper	636	31.6%	64.0%	51.0%	59.4%	720	35.8%	27.3%	50.5%	63.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	266	13.2%	56.2%	14.7%	15.2%
Total	*2,012*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,012*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	28	3.8%	3.9%	2.3%	2.1%	14	1.9%	0.7%	3.0%	1.5%
Moderate	118	16.1%	12.1%	10.8%	9.0%	48	6.5%	3.5%	8.3%	4.7%
Middle	242	33.0%	27.2%	30.9%	26.4%	93	12.7%	8.9%	16.2%	11.7%
Upper	346	47.1%	56.8%	55.9%	62.5%	283	38.6%	47.9%	49.0%	58.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	296	40.3%	39.0%	23.6%	23.2%
Total	*734*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*734*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	1.4%	0.0%	2.2%	1.9%	12	8.5%	0.0%	4.0%	0.9%
Moderate	20	14.2%	36.2%	10.9%	10.1%	20	14.2%	0.1%	12.3%	4.9%
Middle	55	39.0%	3.7%	34.4%	24.5%	26	18.4%	0.6%	20.6%	10.7%
Upper	64	45.4%	60.1%	52.5%	63.4%	56	39.7%	10.1%	56.8%	65.2%
Unknown	0	0.0%	0.0%	0.0%	0.1%	27	19.1%	89.1%	6.3%	18.2%
Total	*141*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*141*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	11	11.8%	1.1%	16.5%	12.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	17	18.3%	19.8%	34.2%	26.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	26	28.0%	30.0%	21.7%	21.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	39	41.9%	49.1%	27.5%	39.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	93	100.0%	100.0%	100.0%	100.0%
Total	*93*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*93*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	131	4.4%	2.0%	2.8%	3.6%	140	4.7%	0.5%	2.8%	1.1%
Moderate	578	19.4%	17.3%	12.4%	12.2%	497	16.7%	3.3%	10.5%	5.0%
Middle	1,186	39.8%	22.9%	32.0%	26.3%	602	20.2%	5.5%	18.1%	11.1%
Upper	1,085	36.4%	57.8%	52.8%	57.8%	1,059	35.5%	18.8%	49.4%	53.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	682	22.9%	71.9%	19.2%	29.2%
Total	*2,980*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,980*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	35	3.3%	2.2%	7.3%	5.8%
Moderate	129	12.1%	13.3%	17.1%	14.9%
Middle	424	39.7%	41.1%	28.1%	28.2%
Upper	473	44.2%	42.5%	45.2%	48.4%
Unknown	8	0.7%	0.9%	1.3%	2.1%
Tract Unknown	0	0.0%	0.0%	0.9%	0.6%
Total	*1,069*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*507*	47.4%	31.0%	49.1%	30.5%
	By Loan Size				
$100,000 or less	403	37.7%	6.4%	95.7%	45.2%
$100,001-$250,000	200	18.7%	10.9%	2.1%	12.6%
$250,001-$1 Million	466	43.6%	82.7%	2.2%	42.2%
Total	*1,069*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: New York-Newark-Jersey City, NY-NJ-PA (MSA 35620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	75	3.9%	1.8%	2.8%	2.3%	68	3.5%	0.6%	2.4%	1.0%
Moderate	428	22.1%	9.7%	13.1%	10.2%	245	12.7%	3.0%	11.5%	5.9%
Middle	730	37.7%	24.9%	32.7%	27.2%	190	9.8%	3.8%	19.2%	13.1%
Upper	703	36.3%	63.5%	51.4%	60.2%	331	17.1%	13.6%	50.8%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.1%	1,102	56.9%	79.0%	16.0%	16.4%
Total	*1,936*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,936*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	20	4.5%	3.1%	2.5%	2.2%	5	1.1%	0.3%	4.2%	2.2%
Moderate	68	15.4%	10.6%	11.4%	9.2%	22	5.0%	2.2%	10.3%	6.0%
Middle	152	34.5%	30.8%	31.9%	27.1%	34	7.7%	4.2%	17.6%	12.8%
Upper	201	45.6%	55.4%	54.1%	61.4%	95	21.5%	27.3%	49.2%	60.3%
Unknown	0	0.0%	0.0%	0.0%	0.1%	285	64.6%	66.0%	18.7%	18.8%
Total	*441*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*441*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	2.4%	0.0%	2.1%	1.6%	7	8.5%	0.0%	4.8%	1.3%
Moderate	19	23.2%	1.1%	11.1%	7.7%	16	19.5%	0.1%	11.7%	4.9%
Middle	28	34.1%	2.1%	33.1%	25.7%	10	12.2%	0.2%	19.5%	10.2%
Upper	33	40.2%	96.7%	53.6%	65.0%	24	29.3%	1.5%	54.4%	60.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	30.5%	98.1%	9.7%	23.1%
Total	*82*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*82*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	21	14.8%	12.5%	17.5%	14.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	17	12.0%	26.7%	34.8%	29.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	41	28.9%	21.4%	21.5%	18.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	61	43.0%	39.3%	26.0%	37.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	2	1.4%	0.1%	0.2%	0.2%	142	100.0%	100.0%	100.0%	100.0%
Total	*142*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*142*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	118	4.5%	6.4%	2.9%	4.0%	80	3.1%	0.3%	3.1%	1.2%
Moderate	532	20.5%	16.4%	12.8%	12.8%	283	10.9%	1.4%	10.9%	5.1%
Middle	951	36.6%	22.1%	32.2%	25.9%	234	9.0%	1.9%	18.3%	11.0%
Upper	998	38.4%	55.1%	52.1%	57.2%	450	17.3%	7.7%	49.6%	53.3%
Unknown	2	0.1%	0.0%	0.0%	0.1%	1,554	59.7%	88.6%	18.0%	29.4%
Total	*2,601*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,601*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	38	3.6%	2.8%	6.8%	5.9%
Moderate	132	12.5%	13.2%	16.4%	15.3%
Middle	376	35.5%	37.7%	27.9%	27.9%
Upper	508	48.0%	45.6%	46.4%	48.1%
Unknown	4	0.4%	0.7%	1.3%	2.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.8%
Total	*1,058*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*433*	40.9%	26.9%	42.2%	30.7%
	By Loan Size				
$100,000 or less	408	38.6%	6.9%	95.4%	42.2%
$100,001-$250,000	224	21.2%	13.3%	2.2%	12.3%
$250,001-$1 Million	426	40.3%	79.8%	2.5%	45.6%
Total	*1,058*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Philadelphia-Camden-Wilmington, PA-NJ-DE (MSA 37980)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	18	4.3%	2.3%	2.5%	1.5%	70	16.6%	8.8%	8.7%	4.8%
Moderate	122	28.9%	19.6%	18.6%	13.8%	110	26.1%	19.7%	20.5%	15.3%
Middle	143	33.9%	30.5%	42.5%	38.7%	87	20.6%	19.8%	21.3%	20.1%
Upper	139	32.9%	47.6%	36.3%	46.0%	123	29.1%	40.9%	32.7%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	7.6%	10.8%	16.8%	16.0%
Total	*422*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*422*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	6	1.7%	0.6%	2.0%	1.2%	67	18.6%	8.6%	9.7%	5.8%
Moderate	57	15.8%	8.9%	15.5%	10.9%	78	21.7%	11.4%	18.1%	14.0%
Middle	143	39.7%	35.9%	42.3%	38.4%	66	18.3%	13.1%	22.3%	20.4%
Upper	154	42.8%	54.6%	40.2%	49.5%	123	34.2%	51.8%	38.4%	47.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	7.2%	15.0%	11.5%	12.9%
Total	*360*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*360*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	1.3%	1.0%	1.7%	1.2%	43	14.3%	8.9%	8.4%	5.8%
Moderate	38	12.6%	7.7%	13.8%	10.4%	67	22.3%	16.8%	17.4%	13.7%
Middle	122	40.5%	32.2%	41.5%	36.1%	72	23.9%	20.8%	23.0%	19.2%
Upper	137	45.5%	59.0%	42.9%	52.3%	104	34.6%	48.7%	47.4%	53.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	5.0%	4.9%	3.9%	7.6%
Total	*301*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*301*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.5%	4.3%	0	0.0%	0.0%	0.6%	0.1%
Moderate	1	25.0%	0.3%	33.6%	21.1%	0	0.0%	0.0%	0.1%	0.0%
Middle	1	25.0%	25.0%	29.5%	34.0%	0	0.0%	0.0%	1.3%	0.1%
Upper	2	50.0%	74.7%	26.3%	40.4%	0	0.0%	0.0%	3.2%	0.4%
Unknown	0	0.0%	0.0%	0.1%	0.2%	4	100.0%	100.0%	94.8%	99.4%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	28	2.6%	0.8%	2.3%	1.7%	180	16.6%	5.0%	8.9%	4.5%
Moderate	218	20.1%	8.2%	17.4%	13.9%	255	23.5%	9.2%	19.4%	13.2%
Middle	409	37.6%	29.3%	42.3%	38.0%	225	20.7%	9.9%	21.7%	17.9%
Upper	432	39.7%	61.6%	38.0%	46.4%	350	32.2%	26.0%	35.5%	40.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	77	7.1%	50.0%	14.5%	24.2%
Total	*1,087*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,087*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	19	2.3%	2.0%	3.3%	3.4%
Moderate	156	19.1%	18.9%	16.2%	17.5%
Middle	323	39.6%	37.7%	39.1%	39.7%
Upper	316	38.7%	41.0%	40.1%	38.1%
Unknown	2	0.2%	0.5%	0.3%	0.8%
Tract Unknown	0	0.0%	0.0%	0.9%	0.5%
Total	*816*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*421*	51.6%	25.0%	44.8%	32.3%
	By Loan Size				
$100,000 or less	481	58.9%	10.1%	93.4%	37.8%
$100,001-$250,000	127	15.6%	14.4%	3.3%	14.9%
$250,001-$1 Million	208	25.5%	75.5%	3.3%	47.3%
Total	*816*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Philadelphia-Camden-Wilmington, PA-NJ-DE (MSA 37980)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	41	5.8%	3.0%	2.3%	1.3%	92	13.1%	7.8%	8.1%	4.4%
Moderate	236	33.7%	26.0%	18.3%	13.3%	205	29.2%	22.4%	19.7%	14.5%
Middle	279	39.8%	38.8%	42.9%	38.7%	126	18.0%	17.3%	20.4%	19.1%
Upper	145	20.7%	32.3%	36.5%	46.7%	171	24.4%	33.0%	34.1%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	107	15.3%	19.5%	17.7%	16.1%
Total	*701*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*701*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	9	3.6%	0.9%	2.0%	1.1%	16	6.3%	2.2%	7.3%	4.1%
Moderate	65	25.7%	12.4%	16.0%	11.8%	31	12.3%	5.7%	15.2%	11.2%
Middle	89	35.2%	18.8%	44.1%	39.5%	33	13.0%	7.4%	20.4%	17.9%
Upper	90	35.6%	67.9%	37.9%	47.6%	84	33.2%	31.0%	37.1%	46.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	89	35.2%	53.7%	19.9%	20.5%
Total	*253*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*253*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.9%	1.5%	25	17.9%	5.3%	10.0%	4.7%
Moderate	38	27.1%	15.8%	17.9%	11.1%	48	34.3%	22.1%	18.3%	11.3%
Middle	62	44.3%	43.3%	43.6%	38.7%	42	30.0%	25.3%	23.6%	19.0%
Upper	40	28.6%	40.9%	35.6%	48.7%	22	15.7%	45.9%	44.6%	56.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.1%	1.5%	3.6%	8.1%
Total	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	7.7%	3.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	23.1%	11.5%	34.6%	27.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	46.2%	21.6%	27.2%	30.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	30.8%	66.9%	30.2%	36.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.3%	2.6%	13	100.0%	100.0%	100.0%	100.0%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	50	4.5%	1.6%	2.3%	1.4%	133	12.0%	4.1%	8.0%	4.0%
Moderate	342	30.9%	18.3%	17.6%	14.1%	284	25.7%	11.7%	18.2%	12.3%
Middle	436	39.4%	28.8%	43.3%	38.2%	201	18.2%	9.8%	20.5%	17.1%
Upper	279	25.2%	51.3%	36.8%	46.1%	277	25.0%	23.0%	35.6%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.2%	212	19.2%	51.4%	17.8%	24.1%
Total	*1,107*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,107*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	17	2.9%	2.9%	3.2%	3.1%
Moderate	114	19.8%	20.9%	15.9%	16.9%
Middle	244	42.3%	41.5%	39.5%	40.0%
Upper	198	34.3%	34.0%	40.0%	38.5%
Unknown	4	0.7%	0.6%	0.4%	0.9%
Tract Unknown	0	0.0%	0.0%	1.0%	0.6%
Total	*577*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*280*	48.5%	32.1%	48.8%	35.0%
	By Loan Size				
$100,000 or less	206	35.7%	6.1%	93.5%	38.8%
$100,001-$250,000	145	25.1%	15.7%	3.2%	14.6%
$250,001-$1 Million	226	39.2%	78.1%	3.3%	46.6%
Total	*577*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Philadelphia-Camden-Wilmington, PA-NJ-DE (MSA 37980)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	21	4.0%	1.8%	2.1%	1.4%	53	10.1%	5.4%	7.3%	3.9%
Moderate	124	23.5%	17.8%	17.4%	12.3%	126	23.9%	17.4%	18.8%	13.8%
Middle	222	42.1%	39.4%	43.5%	39.4%	115	21.8%	20.1%	21.1%	19.6%
Upper	160	30.4%	41.0%	37.0%	46.8%	124	23.5%	36.2%	34.2%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	109	20.7%	20.8%	18.6%	16.8%
Total	*527*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*527*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	11	2.5%	1.5%	1.3%	0.8%	28	6.4%	2.9%	4.8%	2.6%
Moderate	67	15.3%	9.4%	13.6%	9.5%	48	10.9%	7.3%	12.1%	8.5%
Middle	176	40.1%	31.8%	43.7%	39.2%	51	11.6%	9.6%	18.6%	16.1%
Upper	185	42.1%	57.3%	41.4%	50.4%	123	28.0%	45.6%	39.6%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	189	43.1%	34.5%	24.9%	24.5%
Total	*439*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*439*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	0.9%	0.0%	3.0%	1.9%	20	18.5%	0.7%	8.4%	3.4%
Moderate	31	28.7%	85.0%	16.4%	10.7%	30	27.8%	2.8%	17.2%	10.6%
Middle	49	45.4%	8.3%	43.7%	36.1%	26	24.1%	5.1%	23.4%	18.7%
Upper	27	25.0%	6.7%	36.9%	51.4%	29	26.9%	7.4%	46.1%	57.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.8%	84.0%	4.9%	9.4%
Total	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	4.0%	1.4%	8.4%	3.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	20.0%	9.5%	30.8%	28.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	7	28.0%	55.6%	27.9%	31.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	12	48.0%	33.5%	32.9%	36.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	100.0%	100.0%	100.0%	100.0%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	34	3.1%	1.5%	1.9%	1.4%	101	9.2%	2.3%	6.3%	3.1%
Moderate	227	20.7%	14.6%	15.8%	12.3%	204	18.6%	7.0%	15.9%	10.7%
Middle	454	41.3%	43.1%	43.5%	38.7%	192	17.5%	8.4%	20.1%	16.9%
Upper	384	34.9%	40.7%	38.8%	47.6%	276	25.1%	22.3%	37.0%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	326	29.7%	59.9%	20.7%	25.3%
Total	*1,099*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,099*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	10	1.4%	1.8%	3.0%	3.3%
Moderate	128	18.2%	19.0%	15.8%	18.1%
Middle	296	42.1%	41.4%	38.9%	36.9%
Upper	268	38.1%	37.7%	41.9%	41.0%
Unknown	1	0.1%	0.1%	0.4%	0.7%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*703*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*302*	43.0%	30.0%	46.0%	32.7%
	By Loan Size				
$100,000 or less	242	34.4%	5.6%	93.6%	38.2%
$100,001-$250,000	165	23.5%	13.4%	3.1%	14.2%
$250,001-$1 Million	296	42.1%	81.0%	3.3%	47.7%
Total	*703*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Philadelphia-Camden-Wilmington, PA-NJ-DE (MSA 37980)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	18	3.0%	1.0%	1.9%	1.2%	70	11.5%	3.0%	7.7%	4.0%
Moderate	161	26.5%	10.5%	17.1%	11.8%	144	23.7%	9.2%	19.0%	14.0%
Middle	237	39.0%	18.5%	44.0%	39.8%	139	22.9%	12.0%	20.1%	18.8%
Upper	192	31.6%	70.0%	37.0%	47.2%	133	21.9%	15.6%	31.2%	42.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	122	20.1%	60.1%	22.0%	20.7%
Total	*608*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*608*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	10	2.3%	1.0%	1.4%	0.9%	21	4.8%	2.4%	5.7%	3.1%
Moderate	79	18.1%	10.9%	14.2%	10.0%	55	12.6%	8.0%	12.9%	9.2%
Middle	193	44.2%	33.5%	44.4%	39.9%	58	13.3%	10.9%	18.7%	16.2%
Upper	155	35.5%	54.7%	40.0%	49.2%	99	22.7%	35.5%	35.5%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	204	46.7%	43.2%	27.2%	27.5%
Total	*437*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*437*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	5	4.6%	1.1%	2.8%	1.4%	25	23.1%	3.4%	9.8%	4.0%
Moderate	28	25.9%	6.7%	16.6%	9.9%	23	21.3%	5.5%	18.5%	12.3%
Middle	45	41.7%	15.8%	44.9%	37.0%	28	25.9%	14.5%	23.8%	17.8%
Upper	30	27.8%	76.4%	35.7%	51.7%	28	25.9%	18.5%	42.6%	56.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	3.7%	58.1%	5.4%	9.2%
Total	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	7.2%	3.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	43.8%	25.1%	27.3%	21.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	31.3%	32.5%	32.4%	31.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	25.0%	42.3%	33.0%	43.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.1%	0.7%	16	100.0%	100.0%	100.0%	100.0%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	33	2.8%	0.5%	1.8%	1.3%	116	9.9%	1.5%	7.0%	3.3%
Moderate	275	23.5%	17.5%	15.9%	12.1%	222	19.0%	4.7%	16.3%	10.7%
Middle	480	41.1%	27.5%	44.1%	38.9%	225	19.2%	6.2%	19.6%	15.8%
Upper	381	32.6%	54.6%	38.2%	47.6%	260	22.2%	11.4%	33.6%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.1%	346	29.6%	76.3%	23.5%	31.4%
Total	*1,169*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,169*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	18	2.5%	3.4%	2.9%	2.9%
Moderate	152	21.5%	22.0%	16.3%	18.3%
Middle	281	39.8%	40.6%	38.8%	38.0%
Upper	250	35.4%	32.9%	40.2%	39.3%
Unknown	5	0.7%	1.1%	0.4%	0.8%
Tract Unknown	0	0.0%	0.0%	1.4%	0.7%
Total	*706*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*309*	43.8%	28.3%	50.1%	33.9%
	By Loan Size				
$100,000 or less	257	36.4%	6.4%	93.1%	36.8%
$100,001-$250,000	141	20.0%	12.2%	3.3%	14.3%
$250,001-$1 Million	308	43.6%	81.4%	3.6%	48.8%
Total	*706*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Philadelphia-Camden-Wilmington, PA-NJ-DE (MSA 37980)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	20	3.3%	1.1%	2.1%	1.2%	25	4.1%	1.3%	7.2%	3.7%
Moderate	152	25.2%	11.6%	16.9%	11.3%	52	8.6%	4.0%	18.6%	13.3%
Middle	247	41.0%	37.1%	43.0%	39.1%	52	8.6%	5.1%	20.3%	18.7%
Upper	184	30.5%	50.1%	37.9%	48.3%	75	12.4%	12.6%	33.0%	44.9%
Unknown	0	0.0%	0.0%	0.1%	0.0%	399	66.2%	76.9%	20.9%	19.5%
Total	*603*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*603*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	9	2.6%	1.0%	1.9%	1.1%	16	4.6%	1.8%	7.2%	4.1%
Moderate	74	21.4%	11.2%	16.2%	11.3%	31	9.0%	4.2%	15.0%	11.0%
Middle	144	41.7%	26.5%	44.6%	40.4%	32	9.3%	6.1%	20.1%	17.6%
Upper	118	34.2%	61.3%	37.3%	47.2%	71	20.6%	24.8%	36.4%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	195	56.5%	63.1%	21.3%	22.5%
Total	*345*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*345*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	3.4%	0.1%	3.0%	1.8%	24	20.7%	0.4%	10.1%	4.7%
Moderate	24	20.7%	0.5%	17.5%	11.3%	33	28.4%	0.8%	18.3%	11.5%
Middle	43	37.1%	3.8%	44.7%	37.2%	22	19.0%	0.9%	22.9%	17.9%
Upper	45	38.8%	95.6%	34.8%	49.7%	27	23.3%	3.1%	41.0%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	8.6%	94.8%	7.7%	15.7%
Total	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	7.7%	0.1%	8.2%	5.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	38.5%	53.5%	26.3%	24.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	23.1%	21.1%	31.7%	33.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	8	30.8%	25.4%	33.8%	36.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	100.0%	100.0%	100.0%	100.0%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	35	3.2%	0.4%	2.1%	1.7%	65	6.0%	0.5%	7.4%	3.4%
Moderate	260	23.9%	36.8%	16.7%	12.9%	116	10.6%	1.5%	17.1%	10.9%
Middle	440	40.4%	24.9%	43.7%	38.8%	106	9.7%	1.9%	20.3%	16.1%
Upper	355	32.6%	37.9%	37.5%	46.6%	173	15.9%	5.8%	34.7%	39.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	630	57.8%	90.3%	20.5%	29.9%
Total	*1,090*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,090*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	29	3.9%	5.6%	2.7%	3.2%
Moderate	173	23.4%	23.8%	15.6%	18.9%
Middle	280	37.8%	38.6%	38.5%	36.7%
Upper	257	34.7%	31.6%	41.2%	39.5%
Unknown	1	0.1%	0.4%	0.4%	1.0%
Tract Unknown	0	0.0%	0.0%	1.7%	0.7%
Total	*740*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*289*	39.1%	24.6%	45.5%	32.4%
	By Loan Size				
$100,000 or less	289	39.1%	7.4%	92.8%	35.2%
$100,001-$250,000	156	21.1%	13.6%	3.4%	14.8%
$250,001-$1 Million	295	39.9%	79.0%	3.8%	50.1%
Total	*740*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Salisbury, MD-DE (MSA 41540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	10	7.5%	3.0%	4.0%	1.9%
Moderate	6	4.5%	2.5%	5.2%	3.0%	26	19.4%	10.7%	13.0%	8.5%
Middle	89	66.4%	54.0%	61.9%	58.1%	22	16.4%	11.5%	16.5%	13.2%
Upper	39	29.1%	43.5%	32.9%	39.0%	66	49.3%	66.7%	51.8%	62.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	7.5%	8.1%	14.9%	13.7%
Total	*134*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*134*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	19	12.2%	8.0%	8.4%	4.3%
Moderate	11	7.1%	3.4%	5.1%	3.0%	27	17.3%	10.3%	15.8%	10.3%
Middle	79	50.6%	43.3%	59.3%	52.8%	42	26.9%	19.4%	20.8%	16.8%
Upper	66	42.3%	53.3%	35.5%	44.2%	62	39.7%	57.6%	43.2%	55.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	3.8%	4.7%	11.9%	13.1%
Total	*156*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*156*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	15	8.4%	5.6%	8.4%	5.2%
Moderate	9	5.1%	3.0%	4.6%	2.7%	32	18.0%	11.5%	15.7%	11.0%
Middle	130	73.0%	63.1%	66.1%	58.9%	45	25.3%	18.8%	23.9%	17.9%
Upper	39	21.9%	33.9%	29.3%	38.4%	80	44.9%	62.5%	48.7%	61.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	3.4%	1.6%	3.4%	4.1%
Total	*178*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*178*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	13.6%	17.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	77.3%	79.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.1%	2.2%	0	0.0%	0.0%	13.6%	1.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	86.4%	98.8%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	44	9.4%	3.9%	5.2%	2.4%
Moderate	26	5.5%	2.2%	5.2%	3.5%	85	18.1%	8.3%	13.7%	8.6%
Middle	299	63.8%	63.2%	61.6%	57.8%	109	23.2%	11.8%	17.8%	13.6%
Upper	144	30.7%	34.6%	33.2%	38.8%	208	44.3%	48.5%	49.6%	59.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	4.9%	27.5%	13.6%	16.3%
Total	*469*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*469*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	38	11.1%	11.0%	9.0%	9.1%
Middle	262	76.6%	76.9%	61.5%	64.7%
Upper	42	12.3%	12.1%	28.1%	25.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.7%
Total	*342*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*220*	64.3%	36.0%	45.5%	42.3%
	By Loan Size				
$100,000 or less	257	75.1%	21.2%	93.6%	38.1%
$100,001-$250,000	44	12.9%	23.1%	3.2%	15.0%
$250,001-$1 Million	41	12.0%	55.7%	3.2%	47.0%
Total	*342*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Salisbury, MD-DE (MSA 41540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	4	3.7%	1.7%	3.2%	1.4%
Moderate	8	7.4%	3.6%	5.0%	2.9%	12	11.1%	6.6%	12.5%	7.9%
Middle	72	66.7%	63.7%	60.0%	55.1%	12	11.1%	7.6%	15.5%	12.2%
Upper	28	25.9%	32.7%	35.0%	42.0%	56	51.9%	63.6%	54.5%	66.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	22.2%	20.5%	14.3%	12.3%
Total	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	3.4%	2.1%	6.0%	3.0%
Moderate	5	8.6%	6.9%	5.1%	3.1%	13	22.4%	16.3%	13.2%	8.5%
Middle	43	74.1%	70.3%	60.7%	53.2%	12	20.7%	18.6%	17.7%	13.5%
Upper	10	17.2%	22.8%	34.1%	43.6%	19	32.8%	41.0%	44.7%	55.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	20.7%	22.0%	18.5%	19.9%
Total	*58*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*58*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	18	15.0%	7.6%	10.2%	3.7%
Moderate	17	14.2%	7.9%	8.2%	4.3%	32	26.7%	22.2%	16.3%	9.1%
Middle	87	72.5%	70.2%	64.4%	51.5%	40	33.3%	40.5%	22.6%	14.6%
Upper	16	13.3%	21.8%	27.4%	44.2%	30	25.0%	29.7%	43.6%	64.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.3%	8.6%
Total	*120*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*120*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	40.0%	62.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	60.0%	37.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	24	8.4%	2.0%	4.2%	1.8%
Moderate	30	10.5%	4.6%	5.2%	3.6%	57	19.9%	9.7%	12.8%	8.0%
Middle	203	70.7%	65.7%	60.4%	54.3%	64	22.3%	11.5%	16.4%	12.5%
Upper	54	18.8%	29.7%	34.3%	42.1%	105	36.6%	56.6%	51.4%	62.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	37	12.9%	20.3%	15.1%	15.0%
Total	*287*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*287*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	16	9.5%	10.8%	8.8%	8.5%
Middle	118	69.8%	70.7%	62.0%	64.2%
Upper	35	20.7%	18.5%	27.9%	26.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.6%
Total	*169*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*100*	59.2%	35.7%	48.4%	41.2%
	By Loan Size				
$100,000 or less	92	54.4%	12.9%	93.4%	38.7%
$100,001-$250,000	38	22.5%	22.0%	3.3%	15.2%
$250,001-$1 Million	39	23.1%	65.1%	3.3%	46.0%
Total	*169*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Salisbury, MD-DE (MSA 41540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	7	7.0%	1.8%	3.1%	1.4%
Moderate	6	6.0%	1.1%	8.3%	6.3%	13	13.0%	4.2%	11.2%	6.9%
Middle	61	61.0%	35.0%	70.0%	64.4%	12	12.0%	4.6%	16.7%	13.0%
Upper	33	33.0%	63.8%	21.7%	29.2%	51	51.0%	46.4%	54.6%	65.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	17.0%	43.0%	14.5%	13.1%
Total	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	2.1%	1.0%	4.2%	2.0%
Moderate	6	6.4%	2.8%	6.3%	4.6%	11	11.7%	5.0%	8.7%	5.1%
Middle	61	64.9%	55.4%	68.2%	62.5%	14	14.9%	7.4%	14.5%	10.9%
Upper	27	28.7%	41.9%	25.5%	32.9%	48	51.1%	69.5%	51.3%	61.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	20.2%	17.1%	21.4%	20.5%
Total	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	17	16.5%	5.9%	8.9%	2.4%
Moderate	10	9.7%	6.2%	8.6%	5.9%	24	23.3%	10.4%	15.2%	6.7%
Middle	79	76.7%	73.3%	75.6%	71.3%	24	23.3%	30.6%	20.9%	14.5%
Upper	14	13.6%	20.5%	15.8%	22.8%	35	34.0%	50.3%	48.9%	63.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.9%	2.7%	6.0%	13.4%
Total	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	25.0%	3.2%	12.5%	1.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	75.0%	96.8%	58.3%	94.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	29.2%	4.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	26	8.6%	1.0%	3.7%	1.6%
Moderate	23	7.6%	2.4%	7.6%	5.6%	48	15.9%	3.0%	10.4%	6.0%
Middle	204	67.8%	63.0%	69.6%	64.7%	50	16.6%	4.0%	16.0%	11.9%
Upper	74	24.6%	34.6%	22.9%	29.8%	134	44.5%	35.9%	53.0%	62.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	14.3%	56.2%	16.8%	18.1%
Total	*301*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*301*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.2%	0.4%
Moderate	30	14.0%	16.1%	11.7%	13.6%
Middle	140	65.1%	62.3%	64.1%	61.1%
Upper	45	20.9%	21.6%	23.9%	24.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*215*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*116*	54.0%	33.3%	48.0%	39.8%
	By Loan Size				
$100,000 or less	103	47.9%	9.0%	93.1%	35.8%
$100,001-$250,000	45	20.9%	16.1%	3.2%	14.2%
$250,001-$1 Million	67	31.2%	74.9%	3.7%	50.0%
Total	*215*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Salisbury, MD-DE (MSA 41540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	5	5.3%	1.7%	4.1%	1.9%
Moderate	6	6.3%	2.9%	7.7%	6.0%	15	15.8%	7.8%	11.8%	7.5%
Middle	64	67.4%	56.3%	70.8%	66.1%	13	13.7%	10.5%	15.0%	12.2%
Upper	25	26.3%	40.8%	21.5%	27.9%	55	57.9%	74.5%	50.6%	61.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	7.4%	5.4%	18.5%	16.7%
Total	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	6	5.8%	2.1%	5.6%	3.0%
Moderate	4	3.9%	2.6%	6.7%	5.2%	14	13.6%	7.5%	9.9%	6.2%
Middle	69	67.0%	49.7%	68.6%	62.5%	13	12.6%	7.7%	15.4%	11.8%
Upper	30	29.1%	47.7%	24.7%	32.3%	43	41.7%	64.1%	47.8%	57.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	27	26.2%	18.5%	21.2%	21.3%
Total	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	15	17.2%	5.7%	10.0%	3.0%
Moderate	15	17.2%	29.6%	7.7%	3.8%	23	26.4%	10.8%	17.8%	8.8%
Middle	64	73.6%	64.9%	70.4%	61.9%	23	26.4%	24.4%	21.4%	15.7%
Upper	8	9.2%	5.5%	21.9%	34.4%	21	24.1%	40.6%	43.4%	64.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	5.7%	18.5%	7.4%	8.4%
Total	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	9.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	50.0%	90.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	26	9.1%	2.0%	4.9%	2.3%
Moderate	25	8.8%	3.4%	7.4%	5.6%	52	18.2%	7.7%	11.3%	7.0%
Middle	197	69.1%	53.0%	70.0%	64.5%	49	17.2%	9.4%	15.4%	12.1%
Upper	63	22.1%	43.6%	22.7%	29.9%	119	41.8%	68.3%	49.3%	60.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	13.7%	12.6%	19.0%	18.6%
Total	*285*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*285*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.2%	0.5%
Moderate	40	16.3%	12.2%	11.4%	10.6%
Middle	153	62.4%	67.2%	62.9%	64.2%
Upper	52	21.2%	20.6%	23.2%	23.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.3%	0.8%
Total	*245*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*145*	59.2%	35.3%	47.9%	41.3%
	By Loan Size				
$100,000 or less	131	53.5%	12.8%	93.2%	36.4%
$100,001-$250,000	53	21.6%	19.9%	3.4%	15.4%
$250,001-$1 Million	61	24.9%	67.3%	3.4%	48.2%
Total	*245*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Salisbury, MD-DE (MSA 41540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	5	4.5%	1.5%	4.5%	2.0%
Moderate	11	9.8%	5.1%	7.0%	4.7%	18	16.1%	5.9%	13.1%	8.2%
Middle	69	61.6%	49.8%	72.4%	68.4%	12	10.7%	6.4%	15.4%	12.3%
Upper	32	28.6%	45.1%	20.6%	26.9%	54	48.2%	44.1%	50.0%	61.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	20.5%	42.0%	17.0%	16.1%
Total	*112*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*112*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	2.9%	1.3%	6.0%	3.1%
Moderate	9	12.9%	9.2%	7.7%	5.1%	14	20.0%	14.1%	12.4%	7.8%
Middle	52	74.3%	74.8%	68.8%	63.6%	10	14.3%	13.3%	17.8%	14.2%
Upper	9	12.9%	16.0%	23.5%	31.3%	22	31.4%	42.2%	45.1%	56.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	31.4%	29.1%	18.7%	18.2%
Total	*70*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*70*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.1%	11	17.7%	6.6%	11.1%	2.8%
Moderate	11	17.7%	20.3%	8.3%	4.2%	20	32.3%	24.1%	18.8%	11.1%
Middle	48	77.4%	77.9%	75.3%	73.9%	15	24.2%	15.3%	21.6%	13.9%
Upper	3	4.8%	1.8%	16.1%	21.8%	12	19.4%	26.7%	40.6%	52.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	6.5%	27.3%	8.0%	19.4%
Total	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.5%	47.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	41.2%	12.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	35.3%	39.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	18	7.3%	1.3%	5.2%	2.3%
Moderate	31	12.6%	5.6%	7.3%	5.3%	52	21.1%	7.4%	13.1%	8.0%
Middle	169	68.7%	48.8%	71.3%	66.4%	37	15.0%	7.3%	16.4%	12.8%
Upper	46	18.7%	45.6%	21.4%	28.3%	88	35.8%	36.3%	48.0%	59.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	51	20.7%	47.7%	17.3%	17.7%
Total	*246*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*246*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.4%	0.9%
Moderate	36	17.3%	11.3%	11.9%	12.3%
Middle	150	72.1%	74.6%	62.8%	65.0%
Upper	22	10.6%	14.1%	22.0%	20.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.8%	0.9%
Total	*208*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*109*	52.4%	23.1%	45.4%	38.1%
	By Loan Size				
$100,000 or less	116	55.8%	11.7%	93.0%	35.9%
$100,001-$250,000	36	17.3%	15.1%	3.4%	15.4%
$250,001-$1 Million	56	26.9%	73.2%	3.6%	48.7%
Total	*208*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Washington-Arlington-Alexandria, DC-VA-MD-WV (MSA 47900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	21	5.6%	5.4%	4.9%	3.8%	49	13.0%	7.3%	8.0%	4.2%
Moderate	71	18.9%	13.8%	17.3%	12.5%	121	32.2%	24.7%	20.4%	14.5%
Middle	174	46.3%	41.6%	38.0%	33.3%	74	19.7%	20.0%	22.2%	20.6%
Upper	110	29.3%	39.2%	39.5%	50.1%	119	31.6%	44.5%	31.9%	43.5%
Unknown	0	0.0%	0.0%	0.2%	0.2%	13	3.5%	3.6%	17.5%	17.1%
Total	*376*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*376*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	20	4.0%	3.3%	5.1%	4.1%	80	16.2%	9.1%	11.2%	6.6%
Moderate	72	14.6%	10.2%	17.5%	12.9%	90	18.2%	12.2%	18.5%	13.8%
Middle	199	40.3%	31.9%	36.9%	32.2%	107	21.7%	18.2%	22.0%	19.8%
Upper	203	41.1%	54.6%	40.3%	50.7%	192	38.9%	54.8%	34.1%	44.2%
Unknown	0	0.0%	0.0%	0.2%	0.2%	25	5.1%	5.6%	14.2%	15.6%
Total	*494*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*494*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	12	3.5%	2.7%	3.6%	3.5%	48	14.1%	7.8%	7.5%	4.9%
Moderate	51	15.0%	10.5%	12.8%	10.1%	70	20.6%	15.4%	14.9%	10.7%
Middle	130	38.2%	30.5%	34.2%	28.0%	83	24.4%	19.1%	24.5%	18.7%
Upper	147	43.2%	56.3%	49.2%	58.3%	130	38.2%	54.8%	49.2%	57.2%
Unknown	0	0.0%	0.0%	0.2%	0.2%	9	2.6%	2.9%	3.8%	8.5%
Total	*340*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*340*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	14.3%	28.0%	23.4%	14.8%	0	0.0%	0.0%	0.2%	0.0%
Moderate	3	21.4%	10.7%	28.0%	28.9%	0	0.0%	0.0%	0.7%	0.0%
Middle	6	42.9%	50.0%	28.3%	28.2%	0	0.0%	0.0%	0.2%	0.0%
Upper	3	21.4%	11.3%	18.6%	27.6%	0	0.0%	0.0%	1.1%	0.1%
Unknown	0	0.0%	0.0%	1.6%	0.6%	14	100.0%	100.0%	97.7%	99.8%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	55	4.5%	14.9%	4.9%	4.8%	177	14.5%	4.5%	8.9%	4.4%
Moderate	197	16.1%	11.4%	17.1%	14.0%	281	23.0%	10.2%	19.5%	13.1%
Middle	509	41.6%	42.5%	37.5%	32.5%	264	21.6%	10.6%	22.2%	18.6%
Upper	463	37.8%	31.2%	40.3%	48.5%	441	36.0%	27.5%	33.5%	40.3%
Unknown	0	0.0%	0.0%	0.2%	0.3%	61	5.0%	47.2%	15.9%	23.7%
Total	*1,224*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,224*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	65	5.3%	6.4%	4.4%	4.5%
Moderate	272	22.4%	19.7%	18.3%	18.5%
Middle	464	38.2%	42.6%	33.8%	35.0%
Upper	413	34.0%	30.8%	42.5%	41.2%
Unknown	1	0.1%	0.6%	0.3%	0.5%
Tract Unknown	0	0.0%	0.0%	0.6%	0.4%
Total	*1,215*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*714*	58.8%	34.1%	48.4%	31.9%
	By Loan Size				
$100,000 or less	826	68.0%	15.6%	95.0%	41.4%
$100,001-$250,000	165	13.6%	16.7%	2.4%	13.0%
$250,001-$1 Million	224	18.4%	67.7%	2.6%	45.6%
Total	*1,215*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Washington-Arlington-Alexandria, DC-VA-MD-WV (MSA 47900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	33	5.9%	4.6%	4.6%	3.4%	66	11.9%	6.7%	7.1%	3.5%
Moderate	137	24.6%	18.4%	17.7%	13.1%	183	32.9%	25.3%	20.0%	13.8%
Middle	243	43.7%	42.2%	37.9%	33.0%	119	21.4%	21.5%	22.1%	20.1%
Upper	143	25.7%	34.8%	39.5%	50.1%	126	22.7%	34.0%	34.3%	47.5%
Unknown	0	0.0%	0.0%	0.3%	0.3%	62	11.2%	12.4%	16.6%	15.1%
Total	*556*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*556*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	24	7.6%	4.4%	4.5%	4.1%	35	11.1%	5.1%	8.5%	4.3%
Moderate	81	25.7%	16.9%	18.2%	13.1%	62	19.7%	14.2%	16.6%	10.9%
Middle	112	35.6%	34.4%	38.0%	34.4%	54	17.1%	15.2%	21.1%	17.3%
Upper	97	30.8%	43.5%	39.1%	48.2%	89	28.3%	43.8%	34.0%	49.1%
Unknown	1	0.3%	0.8%	0.2%	0.2%	75	23.8%	21.7%	19.9%	18.4%
Total	*315*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*315*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	7	4.5%	4.9%	5.8%	3.6%	39	25.3%	12.5%	11.6%	4.7%
Moderate	32	20.8%	20.4%	18.2%	11.1%	50	32.5%	12.9%	20.4%	11.6%
Middle	84	54.5%	51.4%	38.2%	29.0%	36	23.4%	21.8%	23.1%	16.4%
Upper	31	20.1%	23.3%	37.7%	56.1%	27	17.5%	40.0%	41.1%	58.0%
Unknown	0	0.0%	0.0%	0.1%	0.1%	2	1.3%	12.8%	3.9%	9.4%
Total	*154*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*154*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	28.6%	1.6%	24.6%	12.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	28.6%	32.0%	26.6%	39.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	14.3%	16.2%	22.8%	21.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	28.6%	50.2%	23.8%	26.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	2.3%	0.6%	7	100.0%	100.0%	100.0%	100.0%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	66	6.4%	3.4%	4.7%	4.3%	140	13.6%	4.0%	7.8%	3.5%
Moderate	252	24.4%	23.0%	17.9%	15.0%	295	28.6%	13.7%	18.8%	11.9%
Middle	440	42.6%	31.3%	37.9%	32.5%	209	20.3%	12.4%	21.8%	17.7%
Upper	273	26.5%	42.1%	39.2%	48.0%	242	23.4%	24.0%	34.4%	44.8%
Unknown	1	0.1%	0.2%	0.2%	0.3%	146	14.1%	45.9%	17.2%	22.1%
Total	*1,032*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,032*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	43	5.5%	7.6%	4.4%	4.2%
Moderate	150	19.4%	17.3%	18.7%	17.8%
Middle	317	40.9%	41.4%	33.8%	35.1%
Upper	262	33.8%	33.6%	42.1%	41.9%
Unknown	3	0.4%	0.1%	0.4%	0.5%
Tract Unknown	0	0.0%	0.0%	0.6%	0.4%
Total	*775*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*444*	57.3%	35.5%	54.6%	35.0%
	By Loan Size				
$100,000 or less	413	53.3%	11.4%	94.9%	40.2%
$100,001-$250,000	161	20.8%	18.4%	2.4%	13.2%
$250,001-$1 Million	201	25.9%	70.2%	2.7%	46.6%
Total	*775*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Washington-Arlington-Alexandria, DC-VA-MD-WV (MSA 47900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	16	3.6%	2.0%	4.4%	3.6%	47	10.6%	5.8%	7.7%	3.9%
Moderate	89	20.1%	18.9%	19.8%	15.0%	85	19.2%	13.7%	19.0%	13.5%
Middle	205	46.4%	40.6%	37.7%	32.4%	107	24.2%	23.4%	21.4%	19.9%
Upper	132	29.9%	38.6%	38.1%	48.9%	143	32.4%	42.3%	32.1%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	60	13.6%	14.8%	19.9%	18.8%
Total	*442*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*442*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	18	4.1%	3.7%	3.5%	2.7%	36	8.1%	4.1%	5.4%	2.8%
Moderate	99	22.4%	18.6%	16.5%	12.4%	75	17.0%	11.3%	12.5%	8.3%
Middle	209	47.3%	41.3%	36.7%	31.2%	80	18.1%	18.1%	18.9%	16.0%
Upper	116	26.2%	36.5%	43.3%	53.6%	136	30.8%	44.1%	36.1%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	115	26.0%	22.4%	27.1%	28.1%
Total	*442*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*442*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	3.7%	13.1%	5.1%	3.0%	27	24.8%	7.6%	11.0%	4.2%
Moderate	20	18.3%	4.7%	20.1%	12.7%	24	22.0%	8.4%	18.8%	10.1%
Middle	55	50.5%	43.5%	37.9%	27.7%	23	21.1%	22.0%	23.8%	17.5%
Upper	30	27.5%	38.7%	36.8%	56.7%	34	31.2%	55.2%	41.6%	59.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.9%	6.8%	4.9%	9.0%
Total	*109*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*109*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	16.7%	0.0%	28.4%	21.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	33.3%	93.5%	27.6%	33.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	16.7%	3.2%	21.6%	33.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	33.3%	3.3%	22.4%	11.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	39	3.9%	2.1%	4.0%	4.1%	110	11.0%	3.5%	6.7%	3.2%
Moderate	210	21.0%	40.7%	18.2%	14.7%	184	18.4%	8.8%	15.8%	10.3%
Middle	470	47.0%	29.8%	37.2%	31.8%	210	21.0%	14.8%	20.2%	17.0%
Upper	280	28.0%	27.4%	40.6%	49.4%	313	31.3%	30.4%	34.4%	42.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	182	18.2%	42.4%	23.0%	27.1%
Total	*999*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*999*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	42	4.4%	5.8%	4.0%	3.7%
Moderate	256	27.0%	28.8%	18.7%	17.7%
Middle	320	33.8%	34.7%	34.4%	35.3%
Upper	329	34.7%	30.7%	42.8%	43.0%
Unknown	1	0.1%	0.0%	0.1%	0.2%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*948*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*496*	52.3%	32.3%	49.7%	32.8%
	By Loan Size				
$100,000 or less	524	55.3%	11.9%	95.1%	41.8%
$100,001-$250,000	159	16.8%	14.4%	2.3%	12.4%
$250,001-$1 Million	265	28.0%	73.7%	2.7%	45.7%
Total	*948*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Washington-Arlington-Alexandria, DC-VA-MD-WV (MSA 47900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	27	5.6%	10.2%	4.3%	3.4%	77	16.0%	9.0%	8.8%	4.4%
Moderate	120	25.0%	20.3%	19.5%	14.6%	116	24.2%	18.2%	18.5%	13.4%
Middle	221	46.0%	38.8%	37.1%	31.8%	110	22.9%	24.8%	20.7%	19.9%
Upper	112	23.3%	30.8%	39.1%	50.1%	104	21.7%	31.0%	29.5%	41.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	73	15.2%	16.9%	22.5%	20.9%
Total	*480*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*480*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	24	4.9%	3.6%	3.5%	2.7%	40	8.1%	4.0%	6.2%	3.1%
Moderate	105	21.3%	18.3%	16.4%	12.1%	73	14.8%	10.4%	13.0%	8.7%
Middle	213	43.3%	34.8%	37.4%	31.6%	89	18.1%	15.9%	18.9%	16.4%
Upper	150	30.5%	43.3%	42.6%	53.6%	121	24.6%	34.7%	32.4%	41.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	169	34.3%	35.0%	29.5%	29.9%
Total	*492*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*492*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	4.1%	1.8%	5.1%	4.2%	25	25.8%	8.7%	13.2%	4.9%
Moderate	28	28.9%	44.4%	20.2%	13.2%	27	27.8%	13.8%	21.8%	11.8%
Middle	46	47.4%	21.2%	39.5%	29.2%	25	25.8%	17.7%	24.0%	19.0%
Upper	19	19.6%	32.6%	35.2%	53.4%	19	19.6%	59.6%	36.1%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.0%	0.1%	5.0%	11.7%
Total	*97*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*97*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	4	16.0%	14.6%	27.0%	15.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	32.0%	11.9%	31.6%	29.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	11	44.0%	71.7%	22.9%	36.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	8.0%	1.8%	18.5%	18.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	100.0%	100.0%	100.0%	100.0%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	59	5.4%	11.6%	4.0%	3.9%	142	13.0%	2.5%	7.7%	3.6%
Moderate	261	23.9%	14.8%	18.1%	14.4%	216	19.7%	5.4%	16.0%	10.4%
Middle	491	44.9%	58.3%	37.4%	32.0%	224	20.5%	7.7%	19.9%	17.0%
Upper	283	25.9%	15.3%	40.6%	49.6%	244	22.3%	12.6%	31.1%	39.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	268	24.5%	71.8%	25.3%	30.0%
Total	*1,094*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,094*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	31	4.0%	3.4%	4.4%	3.8%
Moderate	216	27.6%	30.0%	19.2%	18.0%
Middle	295	37.7%	38.4%	34.7%	36.1%
Upper	240	30.7%	28.2%	40.9%	41.5%
Unknown	0	0.0%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	0.7%	0.4%
Total	*782*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*349*	44.6%	31.0%	57.2%	34.7%
	By Loan Size				
$100,000 or less	361	46.2%	10.2%	94.8%	39.5%
$100,001-$250,000	160	20.5%	15.2%	2.3%	12.4%
$250,001-$1 Million	261	33.4%	74.6%	2.9%	48.1%
Total	*782*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Washington-Arlington-Alexandria, DC-VA-MD-WV (MSA 47900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	26	4.6%	2.8%	4.1%	3.2%	28	4.9%	1.9%	8.2%	4.0%
Moderate	182	32.1%	47.5%	18.9%	14.4%	75	13.2%	7.9%	18.1%	12.8%
Middle	220	38.8%	26.9%	37.4%	32.1%	73	12.9%	9.4%	21.3%	20.0%
Upper	139	24.5%	22.8%	39.5%	50.3%	129	22.8%	23.7%	32.5%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	262	46.2%	57.0%	19.9%	18.7%
Total	*567*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*567*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	20	5.3%	3.7%	3.9%	2.9%	24	6.4%	3.9%	8.1%	4.0%
Moderate	98	26.2%	20.1%	17.4%	12.4%	36	9.6%	6.8%	14.7%	9.9%
Middle	160	42.8%	40.2%	38.3%	32.3%	36	9.6%	9.4%	20.1%	17.4%
Upper	96	25.7%	36.0%	40.4%	52.4%	80	21.4%	31.8%	34.4%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	198	52.9%	48.2%	22.7%	23.5%
Total	*374*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*374*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	6	7.0%	6.7%	5.1%	3.9%	29	33.7%	6.8%	12.5%	4.7%
Moderate	27	31.4%	17.5%	20.8%	14.3%	23	26.7%	6.7%	21.5%	12.5%
Middle	44	51.2%	40.2%	39.2%	29.2%	16	18.6%	7.6%	24.4%	19.3%
Upper	9	10.5%	35.6%	34.9%	52.6%	14	16.3%	31.9%	36.0%	52.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	4.7%	47.1%	5.6%	11.1%
Total	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	6	42.9%	9.4%	31.3%	21.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	7.1%	8.8%	31.9%	25.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	28.6%	46.3%	16.3%	31.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	21.4%	35.4%	20.4%	22.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	100.0%	100.0%	100.0%	100.0%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	58	5.6%	6.9%	4.1%	4.0%	81	7.8%	1.0%	8.4%	3.8%
Moderate	308	29.6%	20.9%	18.5%	14.3%	134	12.9%	3.0%	16.9%	11.1%
Middle	428	41.1%	40.2%	37.8%	32.1%	125	12.0%	3.8%	21.0%	18.0%
Upper	247	23.7%	32.0%	39.6%	49.6%	223	21.4%	10.5%	33.4%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	478	45.9%	81.7%	20.4%	24.6%
Total	*1,041*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,041*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	25	3.5%	3.1%	3.8%	3.5%
Moderate	199	27.9%	26.8%	18.4%	17.9%
Middle	252	35.3%	38.7%	34.4%	36.4%
Upper	238	33.3%	31.4%	42.3%	41.6%
Unknown	0	0.0%	0.0%	0.1%	0.2%
Tract Unknown	0	0.0%	0.0%	1.0%	0.5%
Total	*714*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*340*	47.6%	27.5%	50.1%	32.2%
	By Loan Size				
$100,000 or less	364	51.0%	11.6%	93.8%	34.6%
$100,001-$250,000	131	18.3%	15.1%	2.8%	13.4%
$250,001-$1 Million	219	30.7%	73.3%	3.5%	52.0%
Total	*714*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Bridgeport-Stamford-Norwalk, CT (MSA 14860)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	6	10.0%	6.8%	5.7%	2.7%	5	8.3%	4.1%	7.7%	3.1%
Moderate	16	26.7%	18.6%	17.5%	9.7%	19	31.7%	24.9%	20.0%	11.0%
Middle	22	36.7%	30.7%	35.2%	25.8%	25	41.7%	34.9%	20.0%	14.5%
Upper	16	26.7%	43.9%	41.6%	61.8%	11	18.3%	36.0%	41.3%	60.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.1%	10.9%
Total	*60*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*60*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	1.6%	0.4%	3.2%	1.4%	5	7.9%	2.6%	8.0%	3.1%
Moderate	5	7.9%	3.8%	12.5%	6.6%	3	4.8%	2.1%	15.4%	7.7%
Middle	18	28.6%	21.9%	32.0%	20.8%	12	19.0%	13.5%	18.8%	12.3%
Upper	39	61.9%	73.9%	52.2%	71.3%	39	61.9%	73.3%	48.4%	66.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	6.3%	8.4%	9.4%	10.0%
Total	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.0%	1.0%	4	12.1%	3.8%	5.3%	2.2%
Moderate	5	15.2%	4.3%	8.9%	5.5%	4	12.1%	4.0%	12.3%	7.1%
Middle	10	30.3%	31.3%	29.8%	21.9%	8	24.2%	22.1%	17.1%	10.8%
Upper	18	54.5%	64.3%	59.3%	71.5%	17	51.5%	70.2%	60.5%	73.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	6.7%
Total	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	27.5%	19.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	25.0%	3.2%	31.2%	16.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	25.0%	65.4%	24.8%	48.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	50.0%	31.4%	16.5%	15.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	7	4.4%	1.1%	4.8%	3.7%	14	8.8%	1.3%	7.6%	2.8%
Moderate	27	16.9%	5.6%	15.5%	9.3%	26	16.3%	4.3%	18.0%	9.1%
Middle	51	31.9%	48.8%	33.8%	26.1%	45	28.1%	9.0%	19.4%	12.6%
Upper	75	46.9%	44.5%	45.9%	60.9%	67	41.9%	25.0%	44.5%	57.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	5.0%	60.3%	10.6%	17.9%
Total	*160*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*160*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	14	13.6%	14.1%	9.4%	11.0%
Moderate	21	20.4%	31.0%	16.2%	19.2%
Middle	32	31.1%	26.1%	30.3%	30.2%
Upper	36	35.0%	28.9%	43.4%	39.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.5%
Total	*103*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*51*	49.5%	18.8%	45.4%	32.8%
	By Loan Size				
$100,000 or less	61	59.2%	12.5%	95.6%	45.8%
$100,001-$250,000	16	15.5%	14.2%	2.4%	14.7%
$250,001-$1 Million	26	25.2%	73.3%	2.1%	39.5%
Total	*103*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Bridgeport-Stamford-Norwalk, CT (MSA 14860)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	25	17.6%	10.7%	5.2%	2.2%	18	12.7%	6.0%	7.8%	2.9%
Moderate	50	35.2%	29.3%	17.5%	9.4%	42	29.6%	21.1%	19.6%	10.5%
Middle	37	26.1%	26.9%	35.0%	25.2%	41	28.9%	30.6%	19.1%	13.5%
Upper	30	21.1%	33.1%	42.3%	63.1%	26	18.3%	31.8%	42.6%	63.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	10.6%	10.4%	10.8%	9.9%
Total	*142*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*142*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	6.2%	2.5%	3.7%	1.4%	1	1.5%	0.4%	6.7%	2.4%
Moderate	18	27.7%	11.4%	13.0%	6.1%	11	16.9%	7.2%	15.0%	6.9%
Middle	8	12.3%	12.9%	32.4%	20.6%	10	15.4%	9.6%	17.7%	10.5%
Upper	35	53.8%	73.1%	50.9%	71.9%	29	44.6%	58.1%	48.9%	69.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	21.5%	24.7%	11.6%	11.3%
Total	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	16.7%	9.1%	3.8%	1.3%	2	33.3%	31.8%	6.7%	1.4%
Moderate	0	0.0%	0.0%	13.1%	4.9%	1	16.7%	9.1%	16.7%	5.6%
Middle	3	50.0%	51.1%	32.4%	17.4%	0	0.0%	0.0%	19.0%	9.5%
Upper	2	33.3%	39.8%	50.8%	76.3%	3	50.0%	59.1%	53.2%	76.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.3%	7.2%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	38.6%	15.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	11.1%	17.4%	37.0%	43.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	44.4%	59.2%	17.3%	31.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	44.4%	23.4%	7.1%	10.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	100.0%	100.0%	100.0%	100.0%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	30	13.5%	2.5%	4.8%	2.6%	21	9.5%	1.3%	7.4%	2.5%
Moderate	69	31.1%	18.9%	15.9%	10.1%	54	24.3%	5.3%	17.8%	8.5%
Middle	52	23.4%	45.9%	33.9%	23.7%	51	23.0%	7.5%	18.5%	11.6%
Upper	71	32.0%	32.7%	45.4%	63.6%	58	26.1%	14.9%	45.0%	62.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	38	17.1%	71.1%	11.3%	15.3%
Total	*222*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*222*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	6.1%	2.2%	9.2%	11.3%
Moderate	11	22.4%	31.6%	16.3%	19.2%
Middle	18	36.7%	26.5%	30.0%	29.1%
Upper	17	34.7%	39.7%	43.6%	40.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.9%	0.5%
Total	*49*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*21*	42.9%	31.8%	52.5%	36.3%
	By Loan Size				
$100,000 or less	14	28.6%	3.6%	95.4%	44.1%
$100,001-$250,000	10	20.4%	12.0%	2.4%	13.6%
$250,001-$1 Million	25	51.0%	84.3%	2.3%	42.3%
Total	*49*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Bridgeport-Stamford-Norwalk, CT (MSA 14860)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	13	10.2%	5.2%	4.5%	1.9%	17	13.4%	5.4%	7.9%	2.8%
Moderate	31	24.4%	19.2%	16.2%	8.4%	39	30.7%	22.1%	18.7%	9.6%
Middle	50	39.4%	39.0%	41.7%	29.2%	25	19.7%	19.5%	19.5%	13.6%
Upper	33	26.0%	36.6%	37.6%	60.6%	37	29.1%	43.7%	43.5%	63.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	7.1%	9.4%	10.4%	10.0%
Total	*127*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*127*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	5	5.7%	3.3%	2.6%	1.1%	3	3.4%	0.9%	4.3%	1.5%
Moderate	12	13.8%	6.8%	10.4%	4.7%	9	10.3%	5.2%	11.1%	4.8%
Middle	34	39.1%	31.4%	37.2%	22.1%	16	18.4%	15.7%	17.5%	9.7%
Upper	36	41.4%	58.4%	49.8%	72.2%	40	46.0%	67.3%	54.5%	71.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	21.8%	10.8%	12.6%	12.3%
Total	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.2%	1.3%	0	0.0%	0.0%	5.8%	1.6%
Moderate	0	0.0%	0.0%	9.1%	2.6%	0	0.0%	0.0%	12.3%	3.8%
Middle	0	0.0%	0.0%	33.3%	14.3%	0	0.0%	0.0%	18.7%	7.5%
Upper	1	100.0%	100.0%	54.4%	81.7%	1	100.0%	100.0%	57.6%	79.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.6%	7.7%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	32.1%	25.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	31.1%	35.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	23.6%	32.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.2%	6.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	18	8.3%	2.5%	3.6%	2.5%	20	9.3%	1.9%	6.1%	2.0%
Moderate	44	20.4%	50.0%	13.2%	7.7%	48	22.2%	8.2%	14.8%	6.6%
Middle	84	38.9%	20.3%	39.2%	25.4%	41	19.0%	10.2%	18.4%	10.9%
Upper	70	32.4%	27.1%	43.9%	64.4%	78	36.1%	31.7%	49.1%	65.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	13.4%	48.0%	11.6%	15.2%
Total	*216*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*216*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	9.4%	9.9%	8.8%	11.5%
Moderate	11	17.2%	26.1%	15.8%	18.7%
Middle	26	40.6%	29.0%	34.4%	32.1%
Upper	21	32.8%	35.1%	41.0%	37.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*64*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*35*	54.7%	51.4%	48.7%	36.7%
	By Loan Size				
$100,000 or less	24	37.5%	6.7%	95.7%	46.2%
$100,001-$250,000	14	21.9%	15.5%	2.2%	13.0%
$250,001-$1 Million	26	40.6%	77.8%	2.1%	40.9%
Total	*64*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Bridgeport-Stamford-Norwalk, CT (MSA 14860)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	6	5.5%	2.7%	3.9%	1.5%	16	14.7%	7.5%	7.8%	2.6%
Moderate	31	28.4%	20.1%	14.9%	7.4%	39	35.8%	25.7%	17.2%	8.5%
Middle	44	40.4%	39.0%	41.6%	27.3%	19	17.4%	19.1%	17.5%	11.5%
Upper	28	25.7%	38.2%	39.6%	63.8%	30	27.5%	44.6%	42.6%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	4.6%	3.1%	14.9%	13.8%
Total	*109*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*109*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	4.8%	2.9%	2.6%	1.0%	1	1.6%	0.6%	5.1%	1.7%
Moderate	11	17.5%	11.2%	11.3%	5.3%	1	1.6%	1.0%	11.4%	5.0%
Middle	25	39.7%	31.5%	36.9%	23.7%	2	3.2%	2.5%	15.8%	9.4%
Upper	24	38.1%	54.5%	49.2%	70.0%	23	36.5%	55.0%	50.1%	68.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	36	57.1%	40.8%	17.6%	15.7%
Total	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.1%	0.7%	0	0.0%	0.0%	6.0%	0.9%
Moderate	1	12.5%	13.5%	8.3%	3.2%	0	0.0%	0.0%	11.8%	3.5%
Middle	3	37.5%	34.0%	35.3%	15.2%	0	0.0%	0.0%	18.8%	8.7%
Upper	4	50.0%	52.6%	53.2%	80.9%	8	100.0%	100.0%	57.0%	77.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	9.5%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	28.6%	43.1%	42.4%	31.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	28.6%	5.3%	33.7%	42.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	14.3%	44.9%	14.1%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	28.6%	6.7%	9.8%	15.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	100.0%	100.0%	100.0%	100.0%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	11	5.9%	20.2%	3.4%	2.6%	17	9.1%	2.4%	6.4%	2.0%
Moderate	45	24.1%	11.4%	13.0%	7.8%	40	21.4%	7.9%	14.2%	6.4%
Middle	73	39.0%	39.7%	39.0%	24.5%	21	11.2%	6.2%	16.7%	9.9%
Upper	58	31.0%	28.8%	44.5%	65.1%	61	32.6%	30.3%	46.5%	63.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	48	25.7%	53.3%	16.2%	18.4%
Total	*187*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*187*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	13.6%	12.8%	9.2%	11.4%
Moderate	11	25.0%	40.2%	16.3%	20.3%
Middle	14	31.8%	29.2%	33.6%	31.1%
Upper	13	29.5%	17.9%	40.0%	36.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.9%	0.7%
Total	*44*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*19*	43.2%	25.4%	53.3%	35.7%
	By Loan Size				
$100,000 or less	13	29.5%	4.6%	95.2%	43.6%
$100,001-$250,000	7	15.9%	7.0%	2.5%	13.8%
$250,001-$1 Million	24	54.5%	88.5%	2.3%	42.6%
Total	*44*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Bridgeport-Stamford-Norwalk, CT (MSA 14860)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	9	12.0%	8.1%	4.3%	1.8%	0	0.0%	0.0%	7.3%	2.3%
Moderate	21	28.0%	13.5%	15.0%	7.0%	6	8.0%	5.3%	16.2%	7.7%
Middle	29	38.7%	36.0%	39.5%	25.4%	5	6.7%	5.6%	16.7%	10.8%
Upper	16	21.3%	42.4%	41.2%	65.8%	10	13.3%	30.7%	43.1%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	54	72.0%	58.4%	16.7%	15.6%
Total	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	6.9%	3.7%	4.4%	1.8%	0	0.0%	0.0%	8.1%	2.9%
Moderate	9	31.0%	19.1%	14.0%	6.6%	4	13.8%	9.4%	14.4%	6.7%
Middle	9	31.0%	32.0%	36.4%	22.6%	0	0.0%	0.0%	17.0%	10.1%
Upper	9	31.0%	45.2%	45.3%	69.0%	6	20.7%	33.4%	46.0%	68.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	65.5%	57.1%	14.4%	11.6%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.5%	0.9%	0	0.0%	0.0%	7.1%	1.0%
Moderate	2	66.7%	25.7%	10.7%	5.0%	0	0.0%	0.0%	14.6%	4.6%
Middle	1	33.3%	74.3%	38.1%	16.0%	0	0.0%	0.0%	20.6%	7.8%
Upper	0	0.0%	0.0%	47.7%	78.1%	1	33.3%	74.3%	52.1%	77.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	66.7%	25.7%	5.6%	9.6%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	34.4%	8.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	29.6%	35.6%	51.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	70.4%	22.2%	37.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	7.8%	2.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	11	9.9%	1.7%	4.4%	2.2%	0	0.0%	0.0%	7.6%	2.3%
Moderate	34	30.6%	25.9%	14.5%	9.7%	10	9.0%	1.6%	15.4%	6.8%
Middle	41	36.9%	61.6%	38.1%	24.9%	5	4.5%	1.0%	16.9%	9.8%
Upper	25	22.5%	10.8%	42.9%	63.3%	17	15.3%	8.1%	44.4%	61.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	79	71.2%	89.3%	15.7%	19.4%
Total	*111*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*111*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	9.7%	16.2%	8.9%	11.3%
Moderate	8	25.8%	34.8%	16.2%	19.3%
Middle	14	45.2%	40.7%	32.4%	30.8%
Upper	6	19.4%	8.2%	41.3%	38.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.6%
Total	*31*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*12*	38.7%	15.6%	46.7%	33.4%
	By Loan Size				
$100,000 or less	13	41.9%	6.2%	95.1%	43.0%
$100,001-$250,000	2	6.5%	4.2%	2.5%	14.6%
$250,001-$1 Million	16	51.6%	89.6%	2.3%	42.3%
Total	*31*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Dover, DE (MSA 20100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.5%	0.4%	2	5.6%	3.7%	5.5%	3.4%
Moderate	4	11.1%	9.2%	12.4%	11.1%	12	33.3%	26.5%	21.5%	18.3%
Middle	26	72.2%	72.6%	67.2%	66.2%	11	30.6%	25.5%	24.2%	25.4%
Upper	6	16.7%	18.2%	20.0%	22.4%	10	27.8%	42.2%	21.5%	26.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.8%	2.1%	27.2%	26.6%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	1.9%	1.6%	0.7%	0.5%	8	15.4%	14.6%	10.3%	6.7%
Moderate	6	11.5%	10.3%	8.9%	9.8%	12	23.1%	17.0%	21.1%	17.5%
Middle	41	78.8%	77.8%	72.5%	69.6%	15	28.8%	30.9%	21.8%	21.4%
Upper	4	7.7%	10.3%	17.8%	20.1%	16	30.8%	33.7%	30.6%	34.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.9%	3.8%	16.3%	20.1%
Total	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.8%	2.4%	0.9%	1.1%	8	14.3%	8.0%	7.2%	5.8%
Moderate	5	8.9%	4.1%	8.4%	6.0%	13	23.2%	16.2%	17.6%	12.3%
Middle	38	67.9%	79.1%	72.5%	77.0%	14	25.0%	23.2%	26.9%	25.8%
Upper	12	21.4%	14.4%	18.2%	16.0%	19	33.9%	51.2%	43.9%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.6%	1.4%	4.3%	7.7%
Total	*56*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*56*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.0%	1.2%	0	0.0%	0.0%	10.0%	1.3%
Moderate	0	0.0%	0.0%	20.0%	2.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	93.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.0%	2.6%	0	0.0%	0.0%	10.0%	1.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	80.0%	97.7%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	1.4%	1.1%	0.6%	0.4%	18	12.5%	8.6%	6.7%	4.1%
Moderate	15	10.4%	8.4%	11.4%	10.5%	37	25.7%	20.7%	21.1%	17.5%
Middle	105	72.9%	76.0%	68.7%	67.8%	40	27.8%	26.8%	23.8%	23.9%
Upper	22	15.3%	14.5%	19.3%	21.2%	45	31.3%	41.4%	24.9%	27.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	2.8%	2.5%	23.4%	26.6%
Total	*144*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*144*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	13.9%	8.6%
Moderate	16	17.4%	26.3%	12.8%	18.3%
Middle	66	71.7%	48.3%	61.0%	60.3%
Upper	10	10.9%	25.4%	11.5%	12.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.3%
Total	*92*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*63*	68.5%	28.4%	46.4%	35.5%
	By Loan Size				
$100,000 or less	59	64.1%	11.9%	93.5%	39.0%
$100,001-$250,000	13	14.1%	15.0%	3.5%	17.7%
$250,001-$1 Million	20	21.7%	73.1%	3.0%	43.3%
Total	*92*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Dover, DE (MSA 20100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	5.6%	5.0%	0.5%	0.3%	3	8.3%	7.2%	4.4%	2.5%
Moderate	4	11.1%	8.7%	11.5%	10.4%	9	25.0%	23.7%	20.1%	16.7%
Middle	26	72.2%	74.3%	67.1%	65.5%	10	27.8%	24.1%	25.9%	26.2%
Upper	4	11.1%	12.1%	20.8%	23.8%	10	27.8%	33.0%	27.9%	33.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	11.1%	12.0%	21.8%	21.2%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.6%	0	0.0%	0.0%	4.7%	2.7%
Moderate	2	15.4%	18.0%	9.4%	9.1%	2	15.4%	10.9%	12.2%	9.0%
Middle	10	76.9%	77.2%	70.1%	68.4%	4	30.8%	29.3%	18.9%	18.1%
Upper	1	7.7%	4.9%	19.7%	21.9%	7	53.8%	59.8%	27.6%	29.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	36.6%	40.3%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.8%	1.2%	7	17.1%	14.3%	7.4%	3.2%
Moderate	5	12.2%	16.4%	9.6%	12.7%	8	19.5%	13.5%	19.3%	17.1%
Middle	27	65.9%	66.5%	73.0%	67.8%	13	31.7%	32.8%	23.7%	18.3%
Upper	9	22.0%	17.1%	16.5%	18.3%	11	26.8%	30.2%	44.4%	55.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.9%	9.3%	5.2%	6.3%
Total	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.3%	30.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	100.0%	85.7%	69.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	2.1%	3.0%	0.6%	0.4%	10	10.6%	4.9%	4.7%	2.6%
Moderate	11	11.7%	9.7%	10.8%	10.3%	19	20.2%	17.2%	17.7%	14.2%
Middle	67	71.3%	78.3%	68.4%	66.4%	27	28.7%	22.1%	23.6%	23.4%
Upper	14	14.9%	9.0%	20.2%	22.8%	28	29.8%	33.9%	28.8%	32.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	10.6%	22.0%	25.3%	27.5%
Total	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	11.8%	7.1%
Moderate	10	18.2%	10.5%	12.4%	11.2%
Middle	33	60.0%	55.4%	62.9%	67.3%
Upper	12	21.8%	34.1%	12.5%	14.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.5%	0.3%
Total	*55*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*37*	67.3%	42.3%	50.2%	40.1%
	By Loan Size				
$100,000 or less	31	56.4%	10.6%	93.0%	37.0%
$100,001-$250,000	3	5.5%	4.4%	3.1%	13.8%
$250,001-$1 Million	21	38.2%	85.1%	3.9%	49.2%
Total	*55*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Dover, DE (MSA 20100)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	8.0%	4.1%	4.7%	2.6%
Moderate	1	4.0%	4.4%	7.3%	6.0%	5	20.0%	14.5%	20.2%	16.8%
Middle	21	84.0%	81.6%	79.3%	80.2%	6	24.0%	22.5%	26.0%	26.4%
Upper	3	12.0%	14.0%	13.5%	13.8%	9	36.0%	45.4%	27.0%	32.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	12.0%	13.5%	22.1%	21.7%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.2%	1.2%	2.9%	1.9%
Moderate	5	11.1%	6.6%	7.1%	5.6%	8	17.8%	12.8%	11.3%	8.1%
Middle	34	75.6%	76.0%	76.9%	77.8%	5	11.1%	12.3%	15.7%	14.0%
Upper	6	13.3%	17.4%	16.1%	16.6%	26	57.8%	63.6%	25.6%	27.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	11.1%	10.1%	44.4%	48.9%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.9%	5.2%
Moderate	4	13.3%	3.5%	6.7%	5.4%	3	10.0%	2.9%	14.6%	8.5%
Middle	22	73.3%	43.4%	79.0%	82.3%	15	50.0%	32.7%	27.0%	23.4%
Upper	4	13.3%	53.1%	14.2%	12.3%	9	30.0%	43.7%	42.3%	55.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	10.0%	20.7%	8.2%	7.7%
Total	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	3.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	66.7%	96.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	3.0%	2.3%	4.1%	2.3%
Moderate	10	10.0%	5.5%	7.2%	5.8%	16	16.0%	12.8%	16.4%	13.2%
Middle	77	77.0%	76.0%	78.3%	79.3%	26	26.0%	17.7%	22.0%	21.3%
Upper	13	13.0%	18.5%	14.5%	14.9%	44	44.0%	55.1%	27.1%	30.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	11.0%	12.1%	30.4%	32.6%
Total	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	10.9%	5.0%	19.4%	16.9%
Middle	45	70.3%	72.6%	65.4%	71.0%
Upper	12	18.8%	22.4%	15.2%	12.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*64*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*40*	62.5%	28.1%	46.5%	39.1%
	By Loan Size				
$100,000 or less	29	45.3%	8.6%	93.4%	37.6%
$100,001-$250,000	13	20.3%	14.0%	3.4%	15.7%
$250,001-$1 Million	22	34.4%	77.4%	3.2%	46.7%
Total	*64*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Dover, DE (MSA 20100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	7	15.6%	6.2%	7.2%	4.1%
Moderate	4	8.9%	7.9%	6.4%	5.3%	19	42.2%	37.0%	21.7%	17.6%
Middle	38	84.4%	84.8%	78.2%	78.0%	4	8.9%	11.9%	26.3%	28.2%
Upper	3	6.7%	7.3%	15.3%	16.7%	13	28.9%	38.4%	22.8%	28.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.4%	6.6%	22.1%	21.4%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	4.3%	3.0%	4.1%	2.6%
Moderate	3	6.4%	4.5%	7.4%	5.6%	8	17.0%	13.5%	13.2%	10.3%
Middle	33	70.2%	71.2%	74.8%	76.5%	10	21.3%	19.3%	16.8%	15.6%
Upper	11	23.4%	24.3%	17.8%	17.9%	14	29.8%	35.2%	24.0%	26.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	27.7%	28.9%	41.9%	45.1%
Total	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	16.1%	6.1%	12.4%	4.5%
Moderate	0	0.0%	0.0%	5.8%	5.5%	8	25.8%	14.8%	18.9%	9.0%
Middle	26	83.9%	83.3%	78.7%	75.3%	5	16.1%	13.5%	24.7%	30.9%
Upper	5	16.1%	16.7%	15.5%	19.2%	11	35.5%	36.7%	37.8%	47.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.5%	28.9%	6.2%	7.9%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	28.6%	39.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	71.4%	60.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	14	11.4%	4.4%	6.2%	3.4%
Moderate	7	5.7%	5.9%	6.8%	6.5%	35	28.5%	23.6%	18.2%	14.0%
Middle	97	78.9%	77.3%	76.9%	76.8%	19	15.4%	16.0%	22.5%	22.5%
Upper	19	15.4%	16.8%	16.3%	16.6%	38	30.9%	36.6%	24.0%	27.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	13.8%	19.3%	29.1%	32.9%
Total	*123*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*123*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	10.7%	13.1%	15.6%	18.0%
Middle	41	73.2%	49.6%	66.6%	66.1%
Upper	9	16.1%	37.3%	16.5%	15.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.4%
Total	*56*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*33*	58.9%	37.0%	45.1%	35.6%
	By Loan Size				
$100,000 or less	26	46.4%	12.2%	93.0%	37.7%
$100,001-$250,000	10	17.9%	12.1%	3.2%	14.2%
$250,001-$1 Million	20	35.7%	75.7%	3.8%	48.1%
Total	*56*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Dover, DE (MSA 20100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.5%	3.0%
Moderate	3	8.8%	10.9%	6.9%	5.5%	5	14.7%	10.1%	19.5%	15.1%
Middle	28	82.4%	78.0%	80.4%	80.4%	8	23.5%	21.6%	27.3%	28.5%
Upper	3	8.8%	11.1%	12.7%	14.1%	6	17.6%	17.8%	25.6%	32.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	44.1%	50.5%	22.1%	21.3%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	14.3%	8.6%	4.7%	2.8%
Moderate	1	7.1%	4.1%	7.4%	5.9%	1	7.1%	5.9%	13.8%	10.2%
Middle	10	71.4%	71.3%	75.0%	76.4%	1	7.1%	6.8%	16.7%	14.8%
Upper	3	21.4%	24.7%	17.6%	17.7%	3	21.4%	30.6%	30.7%	33.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	50.0%	48.0%	34.1%	38.4%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	3	13.0%	3.0%	9.1%	5.9%
Moderate	2	8.7%	4.4%	8.3%	10.3%	8	34.8%	14.4%	19.1%	14.0%
Middle	14	60.9%	20.4%	74.3%	73.9%	9	39.1%	11.0%	26.5%	21.8%
Upper	7	30.4%	75.1%	17.4%	15.8%	2	8.7%	5.0%	39.6%	46.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.3%	66.6%	5.7%	11.8%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	10.0%	3.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	45.5%	60.0%	60.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	50.0%	54.5%	30.0%	36.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	6.7%	0.6%	5.4%	2.7%
Moderate	6	8.0%	2.1%	7.2%	5.5%	14	18.7%	2.2%	17.6%	12.2%
Middle	54	72.0%	52.1%	78.3%	77.2%	18	24.0%	4.1%	23.8%	21.7%
Upper	15	20.0%	45.9%	14.5%	17.3%	11	14.7%	4.8%	27.9%	29.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	27	36.0%	88.3%	25.3%	33.8%
Total	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	19.6%	28.0%	16.6%	20.9%
Middle	29	56.9%	37.4%	65.7%	63.0%
Upper	12	23.5%	34.6%	16.5%	15.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.4%
Total	*51*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*28*	54.9%	31.2%	41.0%	35.8%
	By Loan Size				
$100,000 or less	25	49.0%	10.2%	94.6%	40.7%
$100,001-$250,000	10	19.6%	18.4%	2.6%	15.2%
$250,001-$1 Million	16	31.4%	71.4%	2.8%	44.1%
Total	*51*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: West Palm Beach, FL (MD 48424)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.9%	1.6%	2	8.0%	1.0%	4.3%	1.9%
Moderate	6	24.0%	11.8%	23.2%	15.7%	3	12.0%	3.3%	15.6%	9.4%
Middle	5	20.0%	6.1%	35.0%	30.4%	2	8.0%	2.2%	20.2%	16.1%
Upper	14	56.0%	82.1%	38.8%	51.8%	17	68.0%	89.6%	43.7%	57.2%
Unknown	0	0.0%	0.0%	0.2%	0.5%	1	4.0%	3.9%	16.2%	15.3%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.2%	1.4%	1	14.3%	7.3%	7.7%	3.8%
Moderate	0	0.0%	0.0%	18.1%	11.5%	2	28.6%	14.5%	16.5%	9.9%
Middle	5	71.4%	44.4%	35.6%	28.8%	0	0.0%	0.0%	21.7%	16.4%
Upper	2	28.6%	55.6%	43.8%	56.3%	3	42.9%	67.1%	42.0%	56.2%
Unknown	0	0.0%	0.0%	0.2%	2.1%	1	14.3%	11.1%	12.2%	13.6%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.5%	1.0%	0	0.0%	0.0%	5.1%	2.6%
Moderate	0	0.0%	0.0%	14.5%	9.3%	0	0.0%	0.0%	12.5%	7.5%
Middle	1	20.0%	5.9%	32.6%	25.6%	0	0.0%	0.0%	20.4%	13.2%
Upper	4	80.0%	94.1%	51.4%	61.3%	5	100.0%	100.0%	58.2%	69.4%
Unknown	0	0.0%	0.0%	0.1%	2.8%	0	0.0%	0.0%	3.8%	7.3%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	21.7%	18.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	40.2%	23.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	22.8%	48.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.9%	8.8%	0	0.0%	0.0%	1.1%	0.1%
Unknown	0	0.0%	0.0%	4.3%	0.4%	0	0.0%	0.0%	98.9%	99.9%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	2.6%	2.6%	3	8.1%	1.6%	5.2%	2.2%
Moderate	6	16.2%	9.5%	21.3%	15.1%	5	13.5%	4.2%	15.6%	8.9%
Middle	11	29.7%	10.1%	35.0%	31.0%	2	5.4%	1.8%	20.5%	15.1%
Upper	20	54.1%	80.5%	40.9%	50.3%	25	67.6%	88.1%	44.1%	53.7%
Unknown	0	0.0%	0.0%	0.2%	1.6%	2	5.4%	4.3%	14.5%	20.1%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	5.4%	7.5%
Moderate	4	44.4%	38.9%	20.2%	20.9%
Middle	1	11.1%	12.6%	28.8%	26.6%
Upper	4	44.4%	48.4%	44.6%	43.8%
Unknown	0	0.0%	0.0%	0.6%	0.9%
Tract Unknown	0	0.0%	0.0%	0.5%	0.4%
Total	*9*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1*	11.1%	12.6%	46.1%	31.6%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	96.1%	51.3%
$100,001-$250,000	0	0.0%	0.0%	2.2%	13.8%
$250,001-$1 Million	9	100.0%	100.0%	1.7%	34.8%
Total	*9*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: West Palm Beach, FL (MD 48424)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.8%	1.7%	0	0.0%	0.0%	3.0%	1.1%
Moderate	7	22.6%	15.3%	22.3%	14.5%	6	19.4%	11.3%	14.6%	8.3%
Middle	7	22.6%	12.3%	35.2%	30.6%	6	19.4%	14.9%	20.0%	15.2%
Upper	17	54.8%	72.4%	39.5%	52.6%	15	48.4%	58.9%	48.0%	61.1%
Unknown	0	0.0%	0.0%	0.2%	0.7%	4	12.9%	14.9%	14.5%	14.3%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	6.3%	1.8%	2.2%	1.3%	0	0.0%	0.0%	5.8%	2.4%
Moderate	1	6.3%	3.3%	17.5%	10.3%	2	12.5%	3.1%	13.5%	6.9%
Middle	3	18.8%	39.4%	36.1%	32.9%	1	6.3%	2.1%	19.4%	13.0%
Upper	11	68.8%	55.6%	44.0%	53.9%	7	43.8%	32.0%	45.2%	63.0%
Unknown	0	0.0%	0.0%	0.1%	1.6%	6	37.5%	62.9%	16.2%	14.7%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.7%	1.1%	0	0.0%	0.0%	4.4%	1.7%
Moderate	0	0.0%	0.0%	17.8%	9.1%	0	0.0%	0.0%	16.2%	8.6%
Middle	0	0.0%	0.0%	36.1%	30.0%	1	100.0%	100.0%	20.5%	14.3%
Upper	1	100.0%	100.0%	43.3%	57.6%	0	0.0%	0.0%	55.1%	70.1%
Unknown	0	0.0%	0.0%	0.1%	2.2%	0	0.0%	0.0%	3.7%	5.4%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	21.7%	23.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	33.3%	46.5%	26.5%	17.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	33.3%	30.7%	21.7%	34.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	33.3%	22.8%	28.9%	23.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	1.2%	0.2%	3	100.0%	100.0%	100.0%	100.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	2.0%	0.1%	2.7%	2.7%	0	0.0%	0.0%	3.8%	1.4%
Moderate	9	17.6%	40.7%	20.7%	13.4%	8	15.7%	1.2%	14.3%	7.5%
Middle	11	21.6%	29.8%	35.5%	31.4%	8	15.7%	1.4%	19.8%	13.8%
Upper	30	58.8%	29.4%	40.9%	51.5%	22	43.1%	7.2%	47.4%	58.6%
Unknown	0	0.0%	0.0%	0.2%	0.9%	13	25.5%	90.2%	14.6%	18.6%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	5.6%	7.5%
Moderate	4	50.0%	39.6%	20.2%	21.7%
Middle	1	12.5%	10.8%	28.5%	26.3%
Upper	2	25.0%	36.0%	44.5%	43.0%
Unknown	1	12.5%	13.5%	0.7%	1.1%
Tract Unknown	0	0.0%	0.0%	0.6%	0.5%
Total	*8*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*4*	50.0%	36.9%	52.9%	34.7%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.9%	49.1%
$100,001-$250,000	0	0.0%	0.0%	2.2%	13.8%
$250,001-$1 Million	8	100.0%	100.0%	1.9%	37.1%
Total	*8*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: West Palm Beach, FL (MD 48424)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	5.6%	1.2%	1.5%	1.0%	0	0.0%	0.0%	3.0%	1.1%
Moderate	0	0.0%	0.0%	19.0%	11.9%	1	5.6%	1.2%	14.9%	8.3%
Middle	5	27.8%	20.5%	38.1%	31.8%	2	11.1%	2.8%	19.6%	14.4%
Upper	12	66.7%	78.2%	41.4%	55.3%	12	66.7%	89.5%	49.1%	62.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	16.7%	6.4%	13.3%	13.5%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.7%	0	0.0%	0.0%	3.7%	1.5%
Moderate	5	17.9%	2.8%	12.6%	7.1%	1	3.6%	0.6%	10.4%	5.4%
Middle	11	39.3%	29.6%	34.2%	26.7%	6	21.4%	3.7%	17.1%	11.5%
Upper	12	42.9%	67.6%	52.3%	65.5%	11	39.3%	87.7%	50.9%	64.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	35.7%	7.9%	17.8%	17.1%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.3%	0.5%	0	0.0%	0.0%	4.6%	1.5%
Moderate	0	0.0%	0.0%	15.1%	7.0%	0	0.0%	0.0%	14.6%	6.3%
Middle	0	0.0%	0.0%	31.0%	22.5%	0	0.0%	0.0%	19.9%	12.7%
Upper	2	100.0%	100.0%	52.6%	70.0%	0	0.0%	0.0%	57.7%	73.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	3.3%	6.3%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.8%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	36.3%	22.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	76.8%	34.3%	58.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	50.0%	23.2%	18.6%	17.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	2.0%	0.1%	1.3%	0.9%	0	0.0%	0.0%	3.3%	1.2%
Moderate	5	10.0%	0.5%	16.5%	11.1%	2	4.0%	0.2%	13.3%	6.6%
Middle	17	34.0%	58.6%	36.4%	32.2%	8	16.0%	0.9%	18.7%	12.2%
Upper	27	54.0%	40.7%	45.8%	55.8%	23	46.0%	25.0%	50.0%	58.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	34.0%	73.9%	14.7%	21.9%
Total	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	3.3%	4.5%
Moderate	3	27.3%	22.1%	16.6%	18.6%
Middle	6	54.5%	72.8%	30.7%	30.4%
Upper	2	18.2%	5.1%	49.1%	46.1%
Unknown	0	0.0%	0.0%	0.2%	0.4%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*11*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	54.5%	60.4%	45.8%	33.1%
	By Loan Size				
$100,000 or less	2	18.2%	3.7%	96.5%	54.2%
$100,001-$250,000	1	9.1%	3.2%	1.9%	12.5%
$250,001-$1 Million	8	72.7%	93.1%	1.6%	33.3%
Total	*11*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: West Palm Beach, FL (MD 48424)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.4%	0.9%	0	0.0%	0.0%	3.2%	1.2%
Moderate	2	7.4%	1.8%	16.6%	9.7%	1	3.7%	1.2%	13.6%	7.0%
Middle	11	40.7%	25.8%	38.5%	31.4%	3	11.1%	4.0%	18.6%	13.1%
Upper	14	51.9%	72.5%	43.4%	58.1%	18	66.7%	89.2%	48.9%	63.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	18.5%	5.6%	15.7%	15.5%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.9%	0.5%	0	0.0%	0.0%	4.4%	1.9%
Moderate	6	27.3%	18.5%	13.3%	7.4%	2	9.1%	4.5%	10.2%	5.2%
Middle	7	31.8%	27.4%	34.9%	27.5%	2	9.1%	7.8%	17.4%	11.6%
Upper	9	40.9%	54.0%	50.8%	64.6%	2	9.1%	10.5%	47.6%	62.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	72.7%	77.1%	20.3%	18.5%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.3%	0.4%	0	0.0%	0.0%	4.8%	0.9%
Moderate	0	0.0%	0.0%	14.5%	5.7%	0	0.0%	0.0%	13.4%	6.1%
Middle	0	0.0%	0.0%	36.4%	27.0%	0	0.0%	0.0%	21.0%	14.1%
Upper	0	0.0%	0.0%	47.8%	66.9%	0	0.0%	0.0%	56.0%	69.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	9.2%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	11.2%	3.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	36.7%	29.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	25.5%	32.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	26.5%	35.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.3%	0.9%	0	0.0%	0.0%	3.7%	1.3%
Moderate	8	16.0%	2.7%	15.4%	10.1%	3	6.0%	0.9%	12.4%	6.0%
Middle	19	38.0%	65.6%	37.2%	30.1%	5	10.0%	2.3%	18.2%	11.9%
Upper	23	46.0%	31.7%	46.1%	58.9%	20	40.0%	32.7%	48.6%	59.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	44.0%	64.1%	17.1%	21.5%
Total	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	3.5%	4.5%
Moderate	4	33.3%	40.9%	16.7%	18.9%
Middle	6	50.0%	46.3%	31.0%	32.0%
Upper	2	16.7%	12.8%	47.9%	43.3%
Unknown	0	0.0%	0.0%	0.2%	0.8%
Tract Unknown	0	0.0%	0.0%	0.6%	0.5%
Total	*12*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*3*	25.0%	26.2%	56.4%	36.5%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	96.6%	51.3%
$100,001-$250,000	0	0.0%	0.0%	1.7%	12.0%
$250,001-$1 Million	12	100.0%	100.0%	1.7%	36.8%
Total	*12*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: West Palm Beach, FL (MD 48424)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.4%	1.0%	0	0.0%	0.0%	3.4%	1.1%
Moderate	1	5.6%	1.1%	15.3%	8.5%	0	0.0%	0.0%	13.6%	6.6%
Middle	2	11.1%	2.4%	36.4%	28.6%	0	0.0%	0.0%	17.4%	11.8%
Upper	15	83.3%	96.5%	46.9%	61.8%	13	72.2%	89.4%	51.9%	67.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	27.8%	10.6%	13.8%	12.9%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.9%	1.0%	0	0.0%	0.0%	5.9%	2.6%
Moderate	2	18.2%	1.5%	12.9%	7.8%	0	0.0%	0.0%	11.1%	5.5%
Middle	2	18.2%	5.2%	35.5%	27.1%	0	0.0%	0.0%	17.3%	11.1%
Upper	7	63.6%	93.3%	50.7%	64.1%	3	27.3%	86.2%	50.2%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	72.7%	13.8%	15.6%	17.2%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.6%	2.4%	0	0.0%	0.0%	6.0%	1.2%
Moderate	0	0.0%	0.0%	17.6%	6.5%	0	0.0%	0.0%	15.1%	6.3%
Middle	0	0.0%	0.0%	31.9%	24.3%	0	0.0%	0.0%	16.9%	8.7%
Upper	0	0.0%	0.0%	47.9%	66.9%	0	0.0%	0.0%	50.6%	67.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.5%	16.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	7.3%	5.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	41.5%	19.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	29.3%	41.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	22.0%	33.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.3%	1.3%	0	0.0%	0.0%	4.2%	1.5%
Moderate	3	10.3%	1.3%	14.7%	8.9%	0	0.0%	0.0%	12.8%	5.9%
Middle	4	13.8%	3.7%	35.9%	28.8%	0	0.0%	0.0%	17.3%	11.0%
Upper	22	75.9%	95.0%	48.1%	61.1%	16	55.2%	87.9%	51.2%	63.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	44.8%	12.1%	14.5%	18.6%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	3.6%	5.3%
Moderate	0	0.0%	0.0%	17.1%	19.4%
Middle	6	85.7%	97.4%	30.8%	31.8%
Upper	1	14.3%	2.6%	47.7%	42.5%
Unknown	0	0.0%	0.0%	0.2%	0.4%
Tract Unknown	0	0.0%	0.0%	0.7%	0.6%
Total	*7*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*4*	57.1%	67.8%	51.3%	33.3%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	96.0%	46.5%
$100,001-$250,000	2	28.6%	8.5%	2.0%	13.1%
$250,001-$1 Million	5	71.4%	91.5%	2.0%	40.3%
Total	*7*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Port St. Lucie, FL (MSA 38940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	0.9%
Moderate	0	0.0%	0.0%	6.1%	4.0%	0	0.0%	0.0%	8.5%	4.3%
Middle	0	0.0%	0.0%	32.9%	25.6%	0	0.0%	0.0%	17.2%	11.9%
Upper	1	100.0%	100.0%	61.0%	70.4%	1	100.0%	100.0%	57.7%	70.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.1%	12.8%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.0%	2.4%
Moderate	0	0.0%	0.0%	4.9%	3.5%	0	0.0%	0.0%	12.8%	7.5%
Middle	0	0.0%	0.0%	33.7%	28.8%	0	0.0%	0.0%	18.1%	14.1%
Upper	1	100.0%	100.0%	61.4%	67.7%	1	100.0%	100.0%	54.0%	65.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.1%	10.4%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	1.1%
Moderate	0	0.0%	0.0%	1.4%	0.6%	0	0.0%	0.0%	6.9%	4.6%
Middle	0	0.0%	0.0%	26.3%	23.3%	0	0.0%	0.0%	19.4%	12.4%
Upper	0	0.0%	0.0%	72.3%	76.1%	0	0.0%	0.0%	67.2%	75.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	6.9%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	42.9%	76.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	42.9%	15.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	14.3%	8.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.1%	1.2%
Moderate	0	0.0%	0.0%	5.4%	7.2%	0	0.0%	0.0%	9.5%	4.9%
Middle	0	0.0%	0.0%	32.5%	25.8%	0	0.0%	0.0%	17.6%	11.9%
Upper	2	100.0%	100.0%	62.2%	67.1%	2	100.0%	100.0%	57.6%	66.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.2%	16.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	17.8%	23.2%
Middle	0	0.0%	0.0%	29.9%	27.8%
Upper	0	0.0%	0.0%	51.3%	48.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.0%	0.6%
Total	*0*	0.0%	0.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	44.5%	35.2%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.3%	46.2%
$100,001-$250,000	0	0.0%	0.0%	2.5%	14.5%
$250,001-$1 Million	0	0.0%	0.0%	2.2%	39.3%
Total	*0*	*0.0%*	*0.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Port St. Lucie, FL (MSA 38940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.9%	0.9%
Moderate	1	33.3%	15.7%	4.5%	2.5%	1	33.3%	15.7%	8.6%	4.2%
Middle	0	0.0%	0.0%	34.2%	25.7%	0	0.0%	0.0%	16.3%	11.1%
Upper	2	66.7%	84.3%	61.4%	71.8%	1	33.3%	51.0%	58.3%	70.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	33.3%	14.9%	13.7%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	2.0%
Moderate	0	0.0%	0.0%	4.4%	2.9%	0	0.0%	0.0%	8.9%	5.2%
Middle	0	0.0%	0.0%	32.6%	28.3%	0	0.0%	0.0%	18.2%	14.1%
Upper	2	100.0%	100.0%	62.9%	68.8%	1	50.0%	58.7%	53.6%	63.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	41.3%	15.0%	15.1%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	1.1%
Moderate	0	0.0%	0.0%	5.0%	2.5%	0	0.0%	0.0%	10.1%	6.3%
Middle	0	0.0%	0.0%	34.6%	22.0%	0	0.0%	0.0%	15.4%	11.1%
Upper	0	0.0%	0.0%	60.3%	75.5%	0	0.0%	0.0%	67.3%	77.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.4%	3.9%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	80.0%	57.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.0%	42.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	1.1%
Moderate	1	20.0%	11.3%	4.5%	2.4%	1	20.0%	11.3%	8.8%	4.3%
Middle	0	0.0%	0.0%	33.8%	28.0%	0	0.0%	0.0%	16.8%	11.3%
Upper	4	80.0%	88.7%	61.7%	69.6%	2	40.0%	53.2%	57.5%	64.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	35.6%	14.2%	18.3%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.5%	23.3%
Middle	0	0.0%	0.0%	31.4%	33.8%
Upper	0	0.0%	0.0%	49.1%	42.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.0%	0.6%
Total	*0*	0.0%	0.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	50.1%	36.7%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.1%	44.1%
$100,001-$250,000	0	0.0%	0.0%	2.5%	13.8%
$250,001-$1 Million	0	0.0%	0.0%	2.5%	42.1%
Total	*0*	*0.0%*	*0.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Port St. Lucie, FL (MSA 38940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	0.8%
Moderate	0	0.0%	0.0%	5.4%	3.2%	0	0.0%	0.0%	9.1%	4.7%
Middle	0	0.0%	0.0%	31.4%	25.8%	0	0.0%	0.0%	16.2%	11.6%
Upper	0	0.0%	0.0%	63.1%	71.0%	0	0.0%	0.0%	58.8%	70.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.6%	12.7%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.0%	0.8%
Moderate	1	33.3%	28.4%	3.7%	1.8%	0	0.0%	0.0%	7.0%	3.3%
Middle	0	0.0%	0.0%	26.5%	21.3%	0	0.0%	0.0%	15.1%	9.2%
Upper	2	66.7%	71.6%	69.8%	76.9%	1	33.3%	55.8%	58.4%	69.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	66.7%	44.2%	17.5%	17.1%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	1.5%
Moderate	0	0.0%	0.0%	7.5%	2.0%	0	0.0%	0.0%	10.3%	3.3%
Middle	0	0.0%	0.0%	24.3%	16.5%	0	0.0%	0.0%	14.6%	6.3%
Upper	0	0.0%	0.0%	68.2%	81.4%	0	0.0%	0.0%	69.2%	87.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	1.8%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	66.7%	99.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.3%	0.8%
Moderate	1	33.3%	28.4%	5.0%	4.9%	0	0.0%	0.0%	8.4%	4.0%
Middle	0	0.0%	0.0%	29.3%	23.3%	0	0.0%	0.0%	15.7%	10.3%
Upper	2	66.7%	71.6%	65.7%	71.8%	1	33.3%	55.8%	59.2%	68.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	66.7%	44.2%	14.4%	15.9%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	17.3%	22.4%
Middle	1	50.0%	46.5%	29.3%	27.7%
Upper	1	50.0%	53.5%	53.4%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*2*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1*	50.0%	46.5%	46.7%	35.7%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	96.3%	53.2%
$100,001-$250,000	0	0.0%	0.0%	2.1%	13.5%
$250,001-$1 Million	2	100.0%	100.0%	1.7%	33.4%
Total	*2*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Port St. Lucie, FL (MSA 38940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.3%	0.4%
Moderate	0	0.0%	0.0%	4.4%	2.1%	0	0.0%	0.0%	8.0%	3.6%
Middle	0	0.0%	0.0%	29.6%	23.4%	0	0.0%	0.0%	13.9%	9.0%
Upper	2	100.0%	100.0%	66.1%	74.5%	1	50.0%	53.3%	60.7%	71.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	46.7%	16.2%	15.1%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.6%	1.8%
Moderate	0	0.0%	0.0%	4.6%	2.3%	0	0.0%	0.0%	6.6%	3.3%
Middle	0	0.0%	0.0%	29.6%	23.1%	0	0.0%	0.0%	13.1%	8.6%
Upper	0	0.0%	0.0%	65.9%	74.6%	0	0.0%	0.0%	56.4%	66.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	20.3%	19.7%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	0.3%
Moderate	0	0.0%	0.0%	6.0%	2.2%	0	0.0%	0.0%	10.9%	5.7%
Middle	0	0.0%	0.0%	31.0%	28.0%	0	0.0%	0.0%	17.9%	14.7%
Upper	0	0.0%	0.0%	63.0%	69.8%	0	0.0%	0.0%	65.8%	77.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.6%	1.7%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	71.4%	48.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	28.6%	51.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	0.8%
Moderate	0	0.0%	0.0%	4.5%	2.1%	0	0.0%	0.0%	7.6%	3.5%
Middle	0	0.0%	0.0%	29.7%	23.8%	0	0.0%	0.0%	13.8%	8.8%
Upper	2	100.0%	100.0%	65.8%	74.1%	1	50.0%	53.3%	59.4%	69.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	46.7%	17.1%	17.5%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	17.4%	27.2%
Middle	0	0.0%	0.0%	29.4%	25.0%
Upper	0	0.0%	0.0%	52.1%	47.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.1%	0.4%
Total	*0*	0.0%	0.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	53.1%	37.4%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.3%	43.2%
$100,001-$250,000	0	0.0%	0.0%	2.0%	10.9%
$250,001-$1 Million	0	0.0%	0.0%	2.7%	46.0%
Total	*0*	*0.0%*	*0.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Port St. Lucie, FL (MSA 38940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.0%	0.7%
Moderate	0	0.0%	0.0%	4.6%	2.3%	0	0.0%	0.0%	10.0%	4.9%
Middle	1	50.0%	77.6%	30.8%	24.2%	0	0.0%	0.0%	16.0%	10.9%
Upper	1	50.0%	22.4%	64.6%	73.5%	0	0.0%	0.0%	57.1%	70.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	14.8%	13.4%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.6%	2.5%
Moderate	0	0.0%	0.0%	5.1%	2.8%	0	0.0%	0.0%	8.8%	4.1%
Middle	0	0.0%	0.0%	30.5%	22.3%	0	0.0%	0.0%	15.7%	9.5%
Upper	0	0.0%	0.0%	64.5%	74.8%	0	0.0%	0.0%	53.3%	65.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.7%	18.4%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.6%	0.1%
Moderate	0	0.0%	0.0%	7.8%	2.8%	0	0.0%	0.0%	15.5%	7.3%
Middle	0	0.0%	0.0%	30.2%	20.6%	0	0.0%	0.0%	19.4%	12.8%
Upper	0	0.0%	0.0%	62.0%	76.6%	0	0.0%	0.0%	57.4%	72.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.2%	7.3%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	89.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	10.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.0%	1.1%
Moderate	0	0.0%	0.0%	4.9%	6.5%	0	0.0%	0.0%	9.8%	4.5%
Middle	1	50.0%	77.6%	30.7%	23.0%	0	0.0%	0.0%	16.0%	10.0%
Upper	1	50.0%	22.4%	64.4%	70.5%	0	0.0%	0.0%	55.9%	65.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	15.2%	18.7%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	19.3%	30.4%
Middle	0	0.0%	0.0%	30.4%	29.5%
Upper	0	0.0%	0.0%	49.1%	39.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.8%
Total	*0*	0.0%	0.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	48.7%	35.3%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.4%	44.4%
$100,001-$250,000	0	0.0%	0.0%	2.3%	13.6%
$250,001-$1 Million	0	0.0%	0.0%	2.3%	42.0%
Total	*0*	*0.0%*	*0.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Sebastian-Vero Beach, FL (MSA 42680)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.2%	0.7%	0	0.0%	0.0%	4.6%	2.3%
Moderate	0	0.0%	0.0%	14.5%	11.8%	0	0.0%	0.0%	17.1%	11.0%
Middle	0	0.0%	0.0%	59.0%	48.7%	0	0.0%	0.0%	22.2%	18.0%
Upper	1	100.0%	100.0%	25.3%	38.8%	1	100.0%	100.0%	41.9%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.2%	12.7%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.9%	0.5%	0	0.0%	0.0%	9.3%	5.2%
Moderate	0	0.0%	0.0%	11.1%	8.1%	0	0.0%	0.0%	19.2%	12.9%
Middle	0	0.0%	0.0%	63.7%	51.6%	0	0.0%	0.0%	22.5%	17.6%
Upper	0	0.0%	0.0%	24.4%	39.7%	0	0.0%	0.0%	36.8%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.2%	14.7%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.7%	0.6%	0	0.0%	0.0%	8.0%	5.0%
Moderate	0	0.0%	0.0%	10.5%	9.2%	0	0.0%	0.0%	16.9%	15.0%
Middle	0	0.0%	0.0%	60.0%	50.2%	0	0.0%	0.0%	23.3%	19.5%
Upper	0	0.0%	0.0%	28.8%	40.1%	0	0.0%	0.0%	49.7%	58.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	2.5%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	5.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	81.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	12.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.1%	0.7%	0	0.0%	0.0%	6.0%	3.0%
Moderate	0	0.0%	0.0%	13.4%	10.8%	0	0.0%	0.0%	17.5%	11.4%
Middle	0	0.0%	0.0%	60.2%	49.8%	0	0.0%	0.0%	22.3%	17.8%
Upper	1	100.0%	100.0%	25.4%	38.7%	1	100.0%	100.0%	41.2%	54.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.9%	13.9%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	6.5%	9.0%
Moderate	0	0.0%	0.0%	14.5%	15.7%
Middle	0	0.0%	0.0%	42.9%	37.0%
Upper	2	100.0%	100.0%	34.7%	37.1%
Unknown	0	0.0%	0.0%	0.6%	0.4%
Tract Unknown	0	0.0%	0.0%	0.8%	0.7%
Total	*2*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1*	50.0%	50.0%	43.0%	33.9%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.7%	49.1%
$100,001-$250,000	0	0.0%	0.0%	2.6%	16.1%
$250,001-$1 Million	2	100.0%	100.0%	1.7%	34.9%
Total	*2*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Sebastian-Vero Beach, FL (MSA 42680)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.0%	0.5%	0	0.0%	0.0%	4.6%	2.0%
Moderate	0	0.0%	0.0%	12.3%	9.3%	1	50.0%	24.1%	17.1%	10.7%
Middle	1	50.0%	24.1%	59.0%	45.1%	0	0.0%	0.0%	20.3%	15.1%
Upper	1	50.0%	75.9%	27.7%	45.1%	1	50.0%	75.9%	43.7%	58.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.4%	13.4%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.4%	0.2%	0	0.0%	0.0%	6.9%	3.3%
Moderate	0	0.0%	0.0%	11.1%	8.2%	1	100.0%	100.0%	16.9%	10.2%
Middle	0	0.0%	0.0%	63.8%	51.5%	0	0.0%	0.0%	22.6%	16.5%
Upper	1	100.0%	100.0%	24.7%	40.1%	0	0.0%	0.0%	37.4%	52.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.2%	17.7%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.4%	1.2%	0	0.0%	0.0%	10.7%	5.5%
Moderate	0	0.0%	0.0%	11.7%	7.3%	0	0.0%	0.0%	19.2%	11.5%
Middle	0	0.0%	0.0%	59.1%	42.5%	0	0.0%	0.0%	21.6%	13.4%
Upper	0	0.0%	0.0%	26.8%	49.0%	0	0.0%	0.0%	45.0%	63.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.4%	5.8%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	58.3%	64.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	34.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.3%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.9%	0.4%	0	0.0%	0.0%	5.5%	2.3%
Moderate	1	25.0%	97.8%	12.0%	11.0%	2	50.0%	1.2%	17.1%	10.2%
Middle	1	25.0%	0.3%	60.2%	46.1%	0	0.0%	0.0%	20.9%	14.8%
Upper	2	50.0%	1.9%	26.8%	42.4%	1	25.0%	1.0%	42.0%	55.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	97.8%	14.5%	17.3%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	9.0%	12.0%
Moderate	0	0.0%	0.0%	13.0%	11.3%
Middle	0	0.0%	0.0%	45.3%	39.3%
Upper	1	100.0%	100.0%	31.1%	35.1%
Unknown	0	0.0%	0.0%	0.7%	1.6%
Tract Unknown	0	0.0%	0.0%	0.9%	0.7%
Total	*1*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	48.1%	37.1%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.3%	46.5%
$100,001-$250,000	0	0.0%	0.0%	2.5%	15.2%
$250,001-$1 Million	1	100.0%	100.0%	2.2%	38.3%
Total	*1*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Sebastian-Vero Beach, FL (MSA 42680)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.6%	0.5%	0	0.0%	0.0%	2.3%	0.9%
Moderate	0	0.0%	0.0%	9.4%	8.0%	0	0.0%	0.0%	13.5%	7.6%
Middle	0	0.0%	0.0%	66.5%	51.0%	0	0.0%	0.0%	19.7%	13.7%
Upper	0	0.0%	0.0%	23.5%	40.5%	0	0.0%	0.0%	50.5%	64.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.0%	12.9%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.5%	0.2%	0	0.0%	0.0%	4.7%	1.7%
Moderate	0	0.0%	0.0%	7.6%	6.5%	0	0.0%	0.0%	10.7%	5.5%
Middle	1	50.0%	12.2%	61.6%	43.1%	0	0.0%	0.0%	16.1%	10.1%
Upper	1	50.0%	87.8%	30.4%	50.2%	1	50.0%	87.8%	48.4%	63.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	12.2%	20.1%	19.4%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.8%	0.3%	0	0.0%	0.0%	8.2%	3.6%
Moderate	0	0.0%	0.0%	5.3%	2.4%	0	0.0%	0.0%	16.3%	8.0%
Middle	0	0.0%	0.0%	65.7%	48.9%	0	0.0%	0.0%	16.3%	7.7%
Upper	0	0.0%	0.0%	28.2%	48.5%	0	0.0%	0.0%	56.7%	75.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	4.8%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	9.1%	1.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	9.1%	33.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	81.8%	65.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.6%	0.4%	0	0.0%	0.0%	3.3%	1.2%
Moderate	0	0.0%	0.0%	8.6%	8.3%	0	0.0%	0.0%	12.8%	6.8%
Middle	1	50.0%	12.2%	65.1%	49.1%	0	0.0%	0.0%	18.5%	12.1%
Upper	1	50.0%	87.8%	25.7%	42.2%	1	50.0%	87.8%	50.1%	62.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	12.2%	15.4%	17.4%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.2%	9.9%
Moderate	0	0.0%	0.0%	8.7%	7.3%
Middle	0	0.0%	0.0%	53.7%	50.0%
Upper	0	0.0%	0.0%	29.8%	31.5%
Unknown	0	0.0%	0.0%	0.6%	1.3%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*0*	0.0%	0.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	46.6%	36.0%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	96.4%	50.3%
$100,001-$250,000	0	0.0%	0.0%	1.9%	12.3%
$250,001-$1 Million	0	0.0%	0.0%	1.7%	37.3%
Total	*0*	*0.0%*	*0.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Sebastian-Vero Beach, FL (MSA 42680)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.5%	0.2%	0	0.0%	0.0%	5.4%	2.3%
Moderate	0	0.0%	0.0%	9.1%	7.4%	0	0.0%	0.0%	15.0%	8.8%
Middle	1	50.0%	7.7%	64.2%	47.6%	1	50.0%	7.7%	19.9%	14.7%
Upper	1	50.0%	92.3%	26.2%	44.9%	1	50.0%	92.3%	46.4%	62.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.2%	11.6%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.4%	0	0.0%	0.0%	5.9%	2.7%
Moderate	0	0.0%	0.0%	7.1%	5.5%	0	0.0%	0.0%	14.0%	7.1%
Middle	4	100.0%	100.0%	60.5%	41.7%	0	0.0%	0.0%	18.6%	11.5%
Upper	0	0.0%	0.0%	31.6%	52.4%	1	25.0%	16.2%	42.5%	60.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	75.0%	83.8%	19.0%	18.6%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.6%	0.0%	0	0.0%	0.0%	12.3%	2.7%
Moderate	0	0.0%	0.0%	8.8%	4.0%	0	0.0%	0.0%	14.0%	4.0%
Middle	0	0.0%	0.0%	62.6%	34.1%	0	0.0%	0.0%	22.8%	14.0%
Upper	0	0.0%	0.0%	28.1%	61.8%	0	0.0%	0.0%	44.4%	67.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	11.4%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.6%	0.2%	0	0.0%	0.0%	5.8%	2.4%
Moderate	0	0.0%	0.0%	8.5%	6.7%	0	0.0%	0.0%	14.7%	8.1%
Middle	5	83.3%	23.7%	63.1%	46.1%	1	16.7%	6.4%	19.6%	13.6%
Upper	1	16.7%	76.3%	27.8%	46.9%	2	33.3%	79.1%	45.2%	61.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	14.5%	14.7%	14.6%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	8.0%	13.2%
Moderate	0	0.0%	0.0%	7.5%	6.4%
Middle	0	0.0%	0.0%	53.2%	47.4%
Upper	0	0.0%	0.0%	29.3%	31.5%
Unknown	0	0.0%	0.0%	0.5%	0.3%
Tract Unknown	0	0.0%	0.0%	1.6%	1.2%
Total	*0*	0.0%	0.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	50.8%	39.8%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.7%	47.0%
$100,001-$250,000	0	0.0%	0.0%	2.2%	13.7%
$250,001-$1 Million	0	0.0%	0.0%	2.1%	39.3%
Total	*0*	*0.0%*	*0.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Sebastian-Vero Beach, FL (MSA 42680)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.8%	0.3%	0	0.0%	0.0%	4.7%	1.8%
Moderate	0	0.0%	0.0%	8.7%	7.2%	0	0.0%	0.0%	12.6%	6.7%
Middle	2	66.7%	25.7%	62.8%	47.3%	0	0.0%	0.0%	18.4%	12.3%
Upper	1	33.3%	74.3%	27.6%	45.2%	2	66.7%	87.5%	52.0%	68.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	12.5%	12.3%	10.2%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.2%	0.1%	0	0.0%	0.0%	7.8%	3.6%
Moderate	0	0.0%	0.0%	6.6%	5.3%	0	0.0%	0.0%	13.5%	7.9%
Middle	1	100.0%	100.0%	59.8%	45.8%	0	0.0%	0.0%	15.3%	11.0%
Upper	0	0.0%	0.0%	33.4%	48.8%	0	0.0%	0.0%	46.2%	59.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	17.2%	18.2%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.3%	0.8%	0	0.0%	0.0%	3.8%	2.4%
Moderate	0	0.0%	0.0%	13.0%	6.7%	0	0.0%	0.0%	15.3%	4.6%
Middle	0	0.0%	0.0%	61.1%	42.2%	0	0.0%	0.0%	19.1%	13.6%
Upper	0	0.0%	0.0%	23.7%	50.3%	0	0.0%	0.0%	56.5%	65.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.3%	14.1%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	66.7%	85.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	14.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.7%	0.2%	0	0.0%	0.0%	5.5%	2.3%
Moderate	0	0.0%	0.0%	8.3%	7.4%	0	0.0%	0.0%	12.9%	7.0%
Middle	3	75.0%	32.6%	61.9%	46.5%	0	0.0%	0.0%	17.6%	11.8%
Upper	1	25.0%	67.4%	29.0%	45.9%	2	50.0%	79.4%	50.5%	65.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	20.6%	13.4%	13.2%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.3%	8.5%
Moderate	0	0.0%	0.0%	7.1%	6.0%
Middle	0	0.0%	0.0%	53.5%	46.0%
Upper	1	100.0%	100.0%	30.2%	37.5%
Unknown	0	0.0%	0.0%	0.7%	0.9%
Tract Unknown	0	0.0%	0.0%	1.2%	1.1%
Total	*1*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	44.7%	39.9%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	95.2%	43.3%
$100,001-$250,000	0	0.0%	0.0%	2.4%	14.6%
$250,001-$1 Million	1	100.0%	100.0%	2.3%	42.1%
Total	*1*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Baltimore-Columbia-Towson, MD (MSA 12580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	52	11.3%	6.2%	3.6%	1.9%	80	17.3%	7.8%	8.3%	4.4%
Moderate	105	22.7%	15.8%	16.2%	10.9%	117	25.3%	17.5%	21.0%	15.6%
Middle	174	37.7%	35.2%	41.5%	37.6%	93	20.1%	19.7%	20.7%	19.9%
Upper	131	28.4%	42.8%	38.6%	49.5%	131	28.4%	43.2%	30.7%	41.7%
Unknown	0	0.0%	0.0%	0.1%	0.1%	41	8.9%	11.8%	19.3%	18.3%
Total	*462*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*462*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	23	2.0%	0.9%	2.8%	1.7%	187	16.6%	9.4%	10.3%	5.9%
Moderate	160	14.2%	10.5%	14.4%	9.8%	241	21.4%	15.7%	18.2%	13.5%
Middle	437	38.8%	37.0%	39.7%	35.5%	249	22.1%	19.7%	21.3%	19.4%
Upper	505	44.9%	51.6%	43.0%	53.0%	410	36.4%	48.3%	33.8%	43.1%
Unknown	0	0.0%	0.0%	0.1%	0.0%	38	3.4%	7.0%	16.4%	18.1%
Total	*1,125*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,125*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	17	2.8%	1.4%	1.8%	1.3%	99	16.1%	11.7%	8.0%	5.4%
Moderate	78	12.7%	9.0%	9.1%	7.1%	135	22.0%	15.9%	15.9%	12.1%
Middle	255	41.5%	35.6%	35.0%	30.5%	143	23.3%	20.6%	23.0%	20.5%
Upper	264	43.0%	54.0%	54.0%	61.1%	225	36.6%	50.1%	49.3%	54.9%
Unknown	0	0.0%	0.0%	0.1%	0.0%	12	2.0%	1.7%	3.8%	7.1%
Total	*614*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*614*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	8.3%	0.1%	16.5%	4.3%	0	0.0%	0.0%	0.5%	0.0%
Moderate	3	25.0%	0.6%	29.1%	32.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	50.0%	56.3%	34.0%	34.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	16.7%	42.9%	19.4%	29.2%	0	0.0%	0.0%	3.4%	0.3%
Unknown	0	0.0%	0.0%	1.0%	0.2%	12	100.0%	100.0%	96.1%	99.7%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	93	4.2%	2.0%	3.3%	2.1%	366	16.5%	6.4%	8.9%	4.4%
Moderate	346	15.6%	8.6%	15.3%	12.3%	493	22.3%	11.4%	19.9%	13.8%
Middle	872	39.4%	42.3%	40.6%	36.7%	485	21.9%	13.8%	21.0%	18.2%
Upper	902	40.8%	47.1%	40.7%	48.9%	766	34.6%	32.5%	32.6%	39.0%
Unknown	0	0.0%	0.0%	0.1%	0.1%	103	4.7%	35.9%	17.7%	24.6%
Total	*2,213*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,213*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	68	4.1%	6.0%	4.1%	4.1%
Moderate	226	13.5%	13.9%	13.8%	13.1%
Middle	690	41.2%	38.9%	37.0%	38.9%
Upper	679	40.6%	39.7%	43.8%	42.5%
Unknown	11	0.7%	1.6%	0.5%	1.1%
Tract Unknown	0	0.0%	0.0%	0.7%	0.4%
Total	*1,674*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*997*	59.6%	25.4%	45.4%	30.3%
	By Loan Size				
$100,000 or less	1,184	70.7%	15.0%	94.5%	40.1%
$100,001-$250,000	191	11.4%	14.1%	2.7%	13.7%
$250,001-$1 Million	299	17.9%	70.9%	2.8%	46.2%
Total	*1,674*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Baltimore-Columbia-Towson, MD (MSA 12580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	46	9.5%	4.3%	3.4%	1.7%	81	16.8%	6.3%	7.8%	3.8%
Moderate	116	24.1%	12.2%	16.7%	10.9%	112	23.2%	16.1%	20.1%	14.5%
Middle	194	40.2%	36.5%	41.6%	38.8%	107	22.2%	21.9%	20.7%	19.6%
Upper	125	25.9%	46.9%	38.3%	48.7%	90	18.7%	27.3%	31.2%	44.5%
Unknown	1	0.2%	0.1%	0.1%	0.0%	92	19.1%	28.4%	20.2%	17.7%
Total	*482*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*482*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	14	4.1%	2.3%	2.6%	1.3%	37	10.9%	6.3%	7.6%	3.8%
Moderate	65	19.1%	11.7%	14.8%	12.1%	74	21.7%	17.3%	15.5%	10.9%
Middle	147	43.1%	40.7%	40.4%	34.9%	59	17.3%	15.2%	19.2%	17.0%
Upper	115	33.7%	45.3%	42.1%	51.7%	92	27.0%	40.5%	33.2%	44.8%
Unknown	0	0.0%	0.0%	0.1%	0.0%	79	23.2%	20.7%	24.5%	23.5%
Total	*341*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*341*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	34	8.0%	10.1%	4.9%	1.5%	139	32.9%	14.1%	12.4%	4.6%
Moderate	109	25.8%	14.6%	15.5%	8.7%	120	28.4%	18.6%	19.9%	12.4%
Middle	194	45.9%	44.3%	39.3%	31.3%	88	20.8%	20.9%	23.9%	19.7%
Upper	86	20.3%	31.0%	40.2%	58.5%	71	16.8%	37.4%	40.2%	58.0%
Unknown	0	0.0%	0.0%	0.1%	0.0%	5	1.2%	9.0%	3.7%	5.3%
Total	*423*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*423*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	5.3%	6.4%	15.3%	5.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	15.8%	0.0%	26.2%	22.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	11	57.9%	26.8%	38.1%	30.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	21.1%	66.8%	18.8%	41.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	1.5%	0.4%	19	100.0%	100.0%	100.0%	100.0%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	95	7.5%	4.8%	3.2%	1.8%	257	20.3%	4.0%	7.9%	3.6%
Moderate	293	23.2%	7.4%	16.1%	11.7%	306	24.2%	10.1%	18.5%	12.7%
Middle	546	43.2%	33.8%	41.1%	37.0%	254	20.1%	11.8%	20.4%	17.9%
Upper	330	26.1%	54.0%	39.6%	49.4%	253	20.0%	19.7%	32.2%	42.7%
Unknown	1	0.1%	0.0%	0.1%	0.0%	195	15.4%	54.4%	20.9%	23.1%
Total	*1,265*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,265*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	28	2.7%	4.3%	4.1%	4.0%
Moderate	128	12.5%	11.2%	13.6%	12.4%
Middle	419	41.1%	39.7%	37.6%	39.7%
Upper	430	42.2%	42.9%	43.5%	42.5%
Unknown	15	1.5%	1.9%	0.5%	0.9%
Tract Unknown	0	0.0%	0.0%	0.7%	0.5%
Total	*1,020*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*567*	55.6%	34.5%	50.8%	33.5%
	By Loan Size				
$100,000 or less	528	51.8%	10.6%	94.1%	38.1%
$100,001-$250,000	206	20.2%	17.4%	2.8%	13.8%
$250,001-$1 Million	286	28.0%	71.9%	3.1%	48.1%
Total	*1,020*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Baltimore-Columbia-Towson, MD (MSA 12580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	57	10.6%	3.6%	3.9%	2.3%	113	20.9%	6.4%	7.0%	3.4%
Moderate	155	28.7%	47.8%	14.8%	9.6%	148	27.4%	12.3%	19.2%	13.8%
Middle	182	33.7%	21.2%	41.2%	37.2%	81	15.0%	8.9%	20.2%	19.2%
Upper	146	27.0%	27.3%	40.1%	51.0%	106	19.6%	21.7%	31.5%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	92	17.0%	50.6%	22.1%	20.0%
Total	*540*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*540*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	15	3.3%	1.4%	2.5%	1.4%	37	8.1%	3.3%	4.7%	2.3%
Moderate	83	18.2%	11.6%	11.2%	6.7%	69	15.1%	9.7%	11.3%	7.5%
Middle	176	38.5%	36.9%	38.9%	34.3%	91	19.9%	16.3%	16.8%	14.2%
Upper	183	40.0%	50.1%	47.4%	57.6%	160	35.0%	48.0%	36.3%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	100	21.9%	22.8%	30.9%	31.1%
Total	*457*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*457*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	35	10.4%	6.3%	4.4%	2.1%	85	25.4%	9.2%	9.2%	3.6%
Moderate	89	26.6%	17.2%	14.1%	6.3%	100	29.9%	17.6%	18.6%	11.5%
Middle	131	39.1%	32.4%	39.7%	33.3%	71	21.2%	27.3%	22.3%	18.6%
Upper	80	23.9%	44.0%	41.8%	58.3%	74	22.1%	39.0%	44.1%	59.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	1.5%	6.9%	5.8%	7.3%
Total	*335*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*335*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	5	19.2%	9.1%	20.8%	9.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	21.9%	13.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	30.8%	61.6%	33.9%	51.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	13	50.0%	29.3%	23.5%	26.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	100.0%	100.0%	100.0%	100.0%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	112	8.2%	5.9%	3.3%	2.1%	235	17.3%	2.7%	6.0%	2.8%
Moderate	327	24.1%	17.4%	13.1%	8.4%	317	23.3%	5.9%	15.6%	10.4%
Middle	497	36.6%	43.9%	40.0%	36.4%	243	17.9%	6.2%	18.7%	16.1%
Upper	422	31.1%	32.9%	43.5%	53.0%	340	25.0%	16.5%	34.2%	42.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	223	16.4%	68.6%	25.5%	28.0%
Total	*1,358*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,358*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	66	5.6%	6.6%	5.3%	5.0%
Moderate	118	10.0%	9.3%	11.8%	10.7%
Middle	495	42.1%	42.2%	37.0%	37.7%
Upper	487	41.4%	40.4%	45.7%	45.7%
Unknown	10	0.9%	1.6%	0.2%	0.8%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*1,176*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*573*	48.7%	28.9%	47.9%	31.1%
	By Loan Size				
$100,000 or less	576	49.0%	10.4%	94.1%	38.1%
$100,001-$250,000	226	19.2%	14.6%	2.7%	13.5%
$250,001-$1 Million	374	31.8%	75.0%	3.2%	48.4%
Total	*1,176*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Baltimore-Columbia-Towson, MD (MSA 12580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	49	7.9%	4.4%	3.5%	2.0%	142	22.8%	11.2%	8.0%	3.9%
Moderate	173	27.8%	18.3%	14.1%	8.7%	182	29.2%	21.7%	19.7%	14.4%
Middle	261	41.9%	43.7%	42.4%	38.0%	111	17.8%	19.1%	19.7%	19.2%
Upper	140	22.5%	33.6%	39.9%	51.3%	106	17.0%	30.5%	29.4%	41.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	82	13.2%	17.5%	23.2%	21.0%
Total	*623*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*623*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	37	7.3%	5.1%	2.8%	1.5%	41	8.1%	4.1%	5.3%	2.6%
Moderate	95	18.7%	10.5%	11.6%	6.9%	83	16.4%	12.0%	12.0%	8.0%
Middle	213	42.0%	38.1%	39.2%	34.6%	71	14.0%	11.4%	16.9%	14.6%
Upper	162	32.0%	46.3%	46.4%	57.0%	139	27.4%	39.9%	32.3%	41.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	173	34.1%	32.6%	33.4%	33.5%
Total	*507*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*507*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	28	8.4%	5.2%	4.8%	1.8%	77	23.2%	9.6%	11.6%	4.6%
Moderate	82	24.7%	14.8%	15.6%	7.4%	93	28.0%	16.3%	19.5%	12.4%
Middle	144	43.4%	43.6%	40.1%	32.6%	75	22.6%	19.1%	24.1%	19.3%
Upper	78	23.5%	36.5%	39.5%	58.2%	83	25.0%	49.6%	39.5%	54.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	1.2%	5.4%	5.2%	9.0%
Total	*332*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*332*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	3.6%	2.3%	17.0%	11.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	35.7%	7.7%	35.9%	37.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	10	35.7%	74.3%	32.0%	41.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	7	25.0%	15.7%	15.0%	10.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	28	100.0%	100.0%	100.0%	100.0%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	115	7.7%	3.7%	3.3%	2.2%	260	17.4%	4.5%	7.0%	3.1%
Moderate	360	24.2%	11.6%	13.1%	9.4%	358	24.0%	9.8%	16.2%	10.8%
Middle	628	42.1%	55.4%	40.8%	36.6%	257	17.2%	8.9%	18.6%	16.2%
Upper	387	26.0%	29.3%	42.8%	51.8%	328	22.0%	20.1%	31.1%	39.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	287	19.3%	56.7%	27.1%	30.2%
Total	*1,490*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,490*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	50	4.3%	4.1%	5.6%	4.7%
Moderate	126	10.9%	12.0%	12.1%	11.4%
Middle	483	42.0%	41.2%	36.4%	38.9%
Upper	490	42.6%	42.2%	44.7%	44.0%
Unknown	2	0.2%	0.4%	0.2%	0.5%
Tract Unknown	0	0.0%	0.0%	1.0%	0.5%
Total	*1,151*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*526*	45.7%	26.8%	50.7%	30.8%
	By Loan Size				
$100,000 or less	546	47.4%	9.9%	93.4%	34.8%
$100,001-$250,000	225	19.5%	14.3%	3.0%	13.8%
$250,001-$1 Million	380	33.0%	75.8%	3.6%	51.5%
Total	*1,151*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Baltimore-Columbia-Towson, MD (MSA 12580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	58	9.4%	5.0%	3.8%	2.1%	74	12.0%	4.6%	6.3%	2.8%
Moderate	160	25.9%	18.2%	14.2%	8.6%	117	18.9%	11.9%	18.5%	12.7%
Middle	244	39.5%	38.9%	41.0%	36.9%	76	12.3%	10.5%	20.2%	18.6%
Upper	156	25.2%	37.8%	40.9%	52.4%	103	16.7%	29.3%	34.4%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	248	40.1%	43.7%	20.7%	18.4%
Total	*618*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*618*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	25	5.9%	2.9%	4.1%	2.3%	26	6.2%	3.1%	7.2%	3.5%
Moderate	89	21.1%	14.4%	14.1%	8.3%	56	13.3%	8.4%	14.0%	9.3%
Middle	166	39.3%	34.9%	39.1%	34.7%	58	13.7%	11.7%	18.5%	15.7%
Upper	142	33.6%	47.9%	42.7%	54.7%	99	23.5%	37.7%	34.9%	45.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	183	43.4%	39.2%	25.5%	25.9%
Total	*422*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*422*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	34	12.0%	11.8%	5.4%	3.3%	76	26.8%	7.2%	11.5%	4.5%
Moderate	62	21.8%	9.3%	15.1%	8.8%	63	22.2%	10.8%	19.0%	12.5%
Middle	117	41.2%	40.4%	40.8%	33.4%	70	24.6%	20.2%	24.5%	19.2%
Upper	71	25.0%	38.5%	38.8%	54.5%	64	22.5%	28.2%	38.3%	52.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	3.9%	33.6%	6.7%	11.2%
Total	*284*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*284*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	15.7%	8.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	42.9%	67.1%	26.5%	18.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	42.9%	21.2%	42.2%	55.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	14.3%	11.7%	15.7%	18.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	100.0%	100.0%	100.0%	100.0%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	117	8.7%	3.3%	4.1%	2.6%	176	13.2%	3.1%	6.9%	2.9%
Moderate	317	23.7%	29.0%	14.3%	9.2%	236	17.6%	7.9%	16.7%	10.6%
Middle	533	39.8%	33.4%	40.2%	37.3%	204	15.2%	8.4%	19.7%	16.3%
Upper	371	27.7%	34.3%	41.4%	50.9%	266	19.9%	24.5%	34.7%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	456	34.1%	56.1%	22.0%	26.5%
Total	*1,338*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,338*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	66	6.0%	5.5%	5.6%	5.5%
Moderate	171	15.5%	14.9%	12.1%	11.3%
Middle	413	37.5%	40.8%	36.4%	39.3%
Upper	449	40.8%	38.5%	44.4%	43.0%
Unknown	1	0.1%	0.2%	0.2%	0.4%
Tract Unknown	0	0.0%	0.0%	1.3%	0.5%
Total	*1,100*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*512*	46.5%	25.9%	46.4%	28.5%
	By Loan Size				
$100,000 or less	592	53.8%	13.1%	93.0%	33.5%
$100,001-$250,000	220	20.0%	17.4%	3.2%	14.7%
$250,001-$1 Million	288	26.2%	69.5%	3.7%	51.8%
Total	*1,100*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: California-Lexington Park, MD (MSA 15680)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	6.1%	4.1%	1	50.0%	53.8%	8.5%	5.2%
Moderate	0	0.0%	0.0%	7.9%	6.3%	1	50.0%	46.2%	24.4%	21.0%
Middle	2	100.0%	100.0%	68.1%	70.1%	0	0.0%	0.0%	24.7%	26.3%
Upper	0	0.0%	0.0%	17.9%	19.5%	0	0.0%	0.0%	21.1%	27.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	21.3%	20.1%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	3.1%	2.4%	1	25.0%	6.0%	10.9%	6.5%
Moderate	0	0.0%	0.0%	7.2%	6.9%	0	0.0%	0.0%	19.3%	15.9%
Middle	4	100.0%	100.0%	70.0%	69.4%	1	25.0%	35.7%	21.6%	21.6%
Upper	0	0.0%	0.0%	19.7%	21.3%	2	50.0%	58.3%	31.9%	37.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.4%	18.1%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.1%	1.5%	1	16.7%	7.0%	8.8%	5.5%
Moderate	0	0.0%	0.0%	4.6%	3.7%	1	16.7%	11.6%	17.5%	14.6%
Middle	4	66.7%	65.1%	68.6%	72.3%	3	50.0%	69.8%	28.9%	30.8%
Upper	2	33.3%	34.9%	23.7%	22.5%	1	16.7%	11.6%	40.7%	36.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.1%	12.9%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	83.3%	97.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	2.4%	0	0.0%	0.0%	16.7%	5.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	83.3%	94.6%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	5.2%	3.6%	3	23.1%	4.7%	9.1%	5.4%
Moderate	0	0.0%	0.0%	7.5%	6.3%	2	15.4%	3.7%	22.7%	19.5%
Middle	11	84.6%	97.8%	68.6%	70.3%	4	30.8%	8.9%	24.1%	25.0%
Upper	2	15.4%	2.2%	18.7%	19.7%	3	23.1%	8.0%	24.8%	29.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	74.7%	19.3%	20.3%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	4.0%	8.0%
Moderate	0	0.0%	0.0%	8.1%	8.0%
Middle	1	100.0%	100.0%	64.7%	66.1%
Upper	0	0.0%	0.0%	20.9%	17.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.2%	0.6%
Total	*1*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1*	100.0%	100.0%	48.7%	40.5%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	92.3%	33.5%
$100,001-$250,000	0	0.0%	0.0%	4.2%	18.2%
$250,001-$1 Million	1	100.0%	100.0%	3.5%	48.2%
Total	*1*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: California-Lexington Park, MD (MSA 15680)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	4.8%	3.3%	1	14.3%	7.8%	6.4%	3.8%
Moderate	1	14.3%	7.8%	7.5%	6.5%	2	28.6%	36.0%	23.1%	19.8%
Middle	6	85.7%	92.2%	69.1%	69.4%	2	28.6%	33.5%	25.6%	26.3%
Upper	0	0.0%	0.0%	18.5%	20.8%	0	0.0%	0.0%	23.4%	29.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	28.6%	22.8%	21.5%	20.4%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	3.3%	2.3%	0	0.0%	0.0%	8.0%	5.3%
Moderate	0	0.0%	0.0%	8.8%	8.0%	1	25.0%	19.7%	15.1%	12.1%
Middle	4	100.0%	100.0%	68.3%	67.7%	1	25.0%	24.0%	21.8%	20.3%
Upper	0	0.0%	0.0%	19.6%	21.9%	1	25.0%	28.1%	30.0%	35.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	28.1%	25.1%	26.5%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	5.4%	4.1%	0	0.0%	0.0%	10.4%	6.4%
Moderate	0	0.0%	0.0%	9.4%	7.4%	4	80.0%	85.1%	19.4%	11.9%
Middle	5	100.0%	100.0%	70.9%	66.0%	0	0.0%	0.0%	21.9%	23.2%
Upper	0	0.0%	0.0%	14.4%	22.5%	1	20.0%	14.9%	46.4%	56.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.8%	2.1%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	80.0%	99.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.0%	0.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	4.4%	2.8%	1	6.3%	4.5%	7.2%	4.0%
Moderate	1	6.3%	4.5%	8.0%	6.5%	7	43.8%	30.4%	20.3%	16.2%
Middle	15	93.8%	95.5%	69.0%	70.8%	3	18.8%	29.0%	24.1%	22.9%
Upper	0	0.0%	0.0%	18.6%	19.8%	2	12.5%	11.7%	27.0%	30.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	24.5%	21.4%	26.9%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	4.8%	7.5%
Moderate	1	33.3%	8.0%	9.0%	8.6%
Middle	1	33.3%	53.5%	64.7%	66.3%
Upper	1	33.3%	38.5%	19.6%	17.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.8%	0.6%
Total	*3*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*2*	66.7%	46.5%	50.3%	39.4%
	By Loan Size				
$100,000 or less	1	33.3%	8.0%	92.0%	32.9%
$100,001-$250,000	2	66.7%	92.0%	4.0%	16.7%
$250,001-$1 Million	0	0.0%	0.0%	4.0%	50.3%
Total	*3*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: California-Lexington Park, MD (MSA 15680)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	3.2%	2.1%	2	66.7%	56.4%	6.9%	3.9%
Moderate	0	0.0%	0.0%	3.8%	3.2%	0	0.0%	0.0%	21.4%	18.0%
Middle	3	100.0%	100.0%	70.1%	69.3%	0	0.0%	0.0%	22.0%	22.9%
Upper	0	0.0%	0.0%	22.9%	25.4%	0	0.0%	0.0%	25.9%	32.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	43.6%	23.9%	22.6%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.7%	1.7%	1	16.7%	8.4%	4.3%	2.6%
Moderate	0	0.0%	0.0%	4.6%	3.9%	1	16.7%	10.1%	10.0%	7.7%
Middle	4	66.7%	51.1%	72.3%	71.4%	0	0.0%	0.0%	18.5%	16.6%
Upper	2	33.3%	48.9%	20.4%	23.0%	1	16.7%	24.0%	26.3%	29.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	57.5%	40.9%	44.2%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.1%	0.3%	0	0.0%	0.0%	9.4%	3.3%
Moderate	0	0.0%	0.0%	3.8%	0.7%	2	33.3%	25.4%	15.3%	13.3%
Middle	6	100.0%	100.0%	80.4%	82.3%	2	33.3%	33.9%	26.4%	25.8%
Upper	0	0.0%	0.0%	13.6%	16.8%	2	33.3%	40.7%	43.8%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.1%	7.9%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	16.7%	16.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	49.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	34.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	2.9%	1.8%	3	20.0%	18.8%	5.8%	3.2%
Moderate	0	0.0%	0.0%	4.2%	3.9%	3	20.0%	8.3%	16.1%	12.8%
Middle	13	86.7%	63.3%	71.6%	69.8%	2	13.3%	1.0%	20.6%	19.4%
Upper	2	13.3%	36.7%	21.4%	24.5%	3	20.0%	19.2%	26.9%	30.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	26.7%	52.8%	30.6%	34.3%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	5.4%	5.6%
Moderate	0	0.0%	0.0%	4.7%	6.6%
Middle	2	100.0%	100.0%	73.9%	73.1%
Upper	0	0.0%	0.0%	16.0%	14.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*2*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*0*	0.0%	0.0%	49.9%	39.9%
	By Loan Size				
$100,000 or less	1	50.0%	9.1%	91.8%	34.9%
$100,001-$250,000	0	0.0%	0.0%	4.3%	17.3%
$250,001-$1 Million	1	50.0%	90.9%	3.9%	47.8%
Total	*2*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: California-Lexington Park, MD (MSA 15680)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	4.6%	3.3%	1	33.3%	8.7%	8.1%	4.7%
Moderate	1	33.3%	8.7%	3.1%	2.5%	1	33.3%	35.9%	21.4%	18.6%
Middle	2	66.7%	91.3%	69.0%	67.5%	1	33.3%	55.4%	23.8%	26.5%
Upper	0	0.0%	0.0%	23.3%	26.6%	0	0.0%	0.0%	17.9%	23.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	28.8%	27.3%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	3.4%	2.3%	0	0.0%	0.0%	5.3%	2.9%
Moderate	0	0.0%	0.0%	4.7%	3.8%	4	80.0%	83.9%	12.3%	9.3%
Middle	5	100.0%	100.0%	73.4%	73.0%	0	0.0%	0.0%	19.8%	18.4%
Upper	0	0.0%	0.0%	18.5%	20.9%	0	0.0%	0.0%	26.8%	31.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	16.1%	35.7%	38.3%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	50.0%	55.6%	2.9%	0.4%	1	50.0%	44.4%	9.1%	4.9%
Moderate	0	0.0%	0.0%	4.1%	1.5%	1	50.0%	55.6%	14.9%	15.1%
Middle	1	50.0%	44.4%	76.8%	73.3%	0	0.0%	0.0%	27.8%	22.1%
Upper	0	0.0%	0.0%	16.2%	24.8%	0	0.0%	0.0%	43.2%	47.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.0%	10.9%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	10.0%	0.6%	4.0%	2.8%	2	20.0%	3.6%	6.9%	3.8%
Moderate	1	10.0%	3.1%	3.8%	3.0%	6	60.0%	66.5%	17.1%	14.2%
Middle	8	80.0%	96.3%	71.3%	70.4%	1	10.0%	19.7%	22.3%	22.5%
Upper	0	0.0%	0.0%	20.8%	23.7%	0	0.0%	0.0%	23.1%	26.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	10.2%	30.5%	32.7%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	4.0%	9.1%
Moderate	0	0.0%	0.0%	3.2%	0.6%
Middle	5	100.0%	100.0%	75.4%	73.7%
Upper	0	0.0%	0.0%	15.1%	15.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.3%	0.9%
Total	*5*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1*	20.0%	3.5%	50.1%	41.7%
	By Loan Size				
$100,000 or less	3	60.0%	15.8%	91.9%	35.7%
$100,001-$250,000	1	20.0%	14.0%	4.1%	16.2%
$250,001-$1 Million	1	20.0%	70.2%	3.9%	48.2%
Total	*5*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: California-Lexington Park, MD (MSA 15680)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	5.2%	3.5%	0	0.0%	0.0%	4.6%	2.4%
Moderate	0	0.0%	0.0%	3.7%	2.8%	1	14.3%	1.9%	19.0%	15.0%
Middle	4	57.1%	9.1%	66.0%	64.2%	0	0.0%	0.0%	24.8%	24.9%
Upper	3	42.9%	90.9%	25.1%	29.5%	0	0.0%	0.0%	27.0%	34.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	85.7%	98.1%	24.6%	23.6%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	3.8%	2.4%	0	0.0%	0.0%	6.0%	3.4%
Moderate	0	0.0%	0.0%	4.2%	3.5%	0	0.0%	0.0%	13.2%	10.4%
Middle	3	100.0%	100.0%	76.7%	77.1%	0	0.0%	0.0%	20.0%	18.6%
Upper	0	0.0%	0.0%	15.4%	16.9%	2	66.7%	63.2%	31.3%	35.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	36.8%	29.5%	32.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.0%	0.7%	0	0.0%	0.0%	7.4%	2.9%
Moderate	0	0.0%	0.0%	4.8%	3.4%	3	75.0%	50.0%	15.7%	10.1%
Middle	4	100.0%	100.0%	73.9%	72.2%	1	25.0%	50.0%	28.7%	29.0%
Upper	0	0.0%	0.0%	18.3%	23.7%	0	0.0%	0.0%	45.2%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.0%	8.1%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	14.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	66.7%	85.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	4.5%	3.0%	0	0.0%	0.0%	5.3%	2.8%
Moderate	0	0.0%	0.0%	4.0%	3.2%	4	25.0%	1.0%	16.6%	13.1%
Middle	13	81.3%	54.0%	70.5%	69.3%	1	6.3%	0.1%	23.2%	22.4%
Upper	3	18.8%	46.0%	20.9%	24.5%	2	12.5%	2.3%	29.7%	34.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	56.3%	96.6%	25.2%	27.3%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	4.9%	6.1%
Moderate	0	0.0%	0.0%	5.0%	3.0%
Middle	4	100.0%	100.0%	71.3%	75.3%
Upper	0	0.0%	0.0%	16.1%	15.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.7%	0.5%
Total	*4*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1*	25.0%	3.6%	43.2%	29.6%
	By Loan Size				
$100,000 or less	2	50.0%	8.9%	91.9%	31.0%
$100,001-$250,000	0	0.0%	0.0%	3.8%	14.1%
$250,001-$1 Million	2	50.0%	91.1%	4.3%	54.9%
Total	*4*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Hagerstown-Martinsburg, MD-WV (MSA 25180)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	2.9%	2.7%	2.2%	1.8%	6	17.1%	9.8%	6.6%	3.8%
Moderate	7	20.0%	17.5%	19.7%	13.2%	9	25.7%	25.2%	18.1%	13.7%
Middle	19	54.3%	54.2%	46.9%	47.0%	11	31.4%	31.9%	22.8%	22.5%
Upper	8	22.9%	25.6%	31.3%	38.1%	9	25.7%	33.0%	29.2%	38.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	23.2%	21.9%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.1%	0.8%	17	16.7%	10.9%	10.6%	5.7%
Moderate	16	15.7%	10.1%	12.2%	7.2%	21	20.6%	17.4%	15.3%	11.3%
Middle	54	52.9%	55.5%	49.3%	48.3%	30	29.4%	30.3%	21.3%	19.6%
Upper	32	31.4%	34.4%	37.4%	43.7%	34	33.3%	41.3%	38.0%	46.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.8%	17.4%
Total	*102*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*102*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.9%	1.9%	7	18.4%	21.3%	10.1%	7.8%
Moderate	2	5.3%	5.4%	7.2%	5.6%	8	21.1%	22.9%	15.9%	13.2%
Middle	20	52.6%	46.0%	50.2%	42.9%	6	15.8%	16.9%	24.6%	22.6%
Upper	16	42.1%	48.6%	40.6%	49.7%	16	42.1%	38.0%	44.4%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.6%	0.8%	4.8%	11.1%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	50.0%	70.4%	16.0%	15.5%	0	0.0%	0.0%	4.0%	3.9%
Moderate	2	50.0%	29.6%	60.0%	46.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	16.0%	31.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.0%	6.6%	0	0.0%	0.0%	4.0%	3.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	92.0%	92.3%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	1.7%	5.3%	1.9%	1.7%	30	16.8%	10.9%	8.0%	4.4%
Moderate	27	15.1%	13.1%	17.0%	11.8%	38	21.2%	19.2%	17.1%	12.9%
Middle	93	52.0%	50.6%	47.6%	47.1%	47	26.3%	27.5%	22.3%	21.4%
Upper	56	31.3%	31.0%	33.5%	39.5%	59	33.0%	35.9%	32.5%	40.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	2.8%	6.5%	20.1%	21.3%
Total	*179*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*179*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	4.2%	2.1%	5.0%	5.9%
Moderate	25	21.0%	28.6%	18.8%	21.6%
Middle	67	56.3%	52.4%	43.9%	44.0%
Upper	22	18.5%	16.9%	31.5%	28.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.5%
Total	*119*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*81*	68.1%	39.8%	47.2%	37.0%
	By Loan Size				
$100,000 or less	89	74.8%	16.8%	92.2%	33.1%
$100,001-$250,000	14	11.8%	18.2%	4.4%	19.8%
$250,001-$1 Million	16	13.4%	64.9%	3.3%	47.2%
Total	*119*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Hagerstown-Martinsburg, MD-WV (MSA 25180)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	4.2%	2.9%	1.8%	1.2%	1	4.2%	1.3%	6.4%	3.5%
Moderate	4	16.7%	7.7%	19.5%	12.5%	6	25.0%	17.1%	19.6%	15.3%
Middle	14	58.3%	65.0%	47.3%	47.6%	3	12.5%	19.7%	20.0%	20.6%
Upper	5	20.8%	24.3%	31.4%	38.8%	12	50.0%	58.4%	27.9%	35.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	8.3%	3.5%	26.0%	25.0%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.7%	1.1%	1	4.5%	3.4%	6.3%	3.4%
Moderate	5	22.7%	19.0%	13.9%	9.0%	5	22.7%	27.9%	14.3%	9.8%
Middle	12	54.5%	50.7%	46.2%	44.4%	3	13.6%	13.6%	18.4%	16.4%
Upper	5	22.7%	30.3%	38.2%	45.5%	10	45.5%	47.7%	35.4%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	13.6%	7.5%	25.6%	28.4%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.9%	0.2%	7	20.6%	20.2%	13.0%	3.6%
Moderate	4	11.8%	5.7%	15.7%	9.2%	13	38.2%	29.8%	20.0%	10.4%
Middle	20	58.8%	62.2%	46.5%	45.8%	8	23.5%	17.4%	23.0%	20.3%
Upper	10	29.4%	32.1%	37.0%	44.8%	6	17.6%	32.6%	39.1%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	17.8%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	11.5%	3.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	42.3%	5.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	100.0%	30.8%	84.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	15.4%	7.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	1.2%	0.4%	1.8%	1.3%	9	10.7%	0.7%	6.7%	3.3%
Moderate	13	15.5%	2.8%	17.8%	11.0%	24	28.6%	5.0%	18.0%	12.7%
Middle	50	59.5%	90.7%	46.9%	48.7%	14	16.7%	3.9%	19.6%	18.2%
Upper	20	23.8%	6.1%	33.6%	39.1%	28	33.3%	12.0%	30.6%	35.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	10.7%	78.5%	25.2%	30.1%
Total	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	8	10.4%	5.7%	5.4%	7.1%
Moderate	10	13.0%	27.3%	17.8%	19.8%
Middle	30	39.0%	35.9%	44.4%	44.6%
Upper	29	37.7%	31.1%	31.7%	28.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.7%	0.5%
Total	*77*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*52*	67.5%	34.7%	49.3%	32.9%
	By Loan Size				
$100,000 or less	54	70.1%	23.2%	92.5%	33.8%
$100,001-$250,000	15	19.5%	27.7%	4.0%	17.5%
$250,001-$1 Million	8	10.4%	49.1%	3.5%	48.7%
Total	*77*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Hagerstown-Martinsburg, MD-WV (MSA 25180)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.1%	0.6%	2	3.7%	1.9%	5.3%	2.9%
Moderate	8	14.8%	11.3%	14.4%	9.6%	13	24.1%	19.2%	18.9%	14.6%
Middle	33	61.1%	65.9%	51.8%	51.2%	11	20.4%	22.7%	20.1%	19.6%
Upper	13	24.1%	22.8%	32.7%	38.7%	13	24.1%	29.3%	27.6%	35.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	27.8%	26.9%	28.1%	27.9%
Total	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.4%	0	0.0%	0.0%	4.9%	2.6%
Moderate	2	9.1%	10.7%	9.8%	6.8%	2	9.1%	8.0%	12.2%	9.0%
Middle	16	72.7%	70.5%	54.2%	53.0%	6	27.3%	28.7%	14.7%	12.7%
Upper	4	18.2%	18.9%	35.1%	39.8%	9	40.9%	46.7%	35.1%	40.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	22.7%	16.7%	33.1%	35.2%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.9%	0.3%	7	29.2%	21.7%	13.4%	6.9%
Moderate	3	12.5%	12.3%	11.5%	7.5%	6	25.0%	21.3%	21.1%	18.2%
Middle	18	75.0%	72.8%	54.1%	40.3%	5	20.8%	20.0%	16.7%	13.1%
Upper	3	12.5%	14.9%	32.5%	51.9%	6	25.0%	37.0%	43.5%	52.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.3%	9.0%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	33.3%	39.4%	14.7%	3.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	35.3%	4.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	33.3%	21.2%	26.5%	88.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	33.3%	39.4%	23.5%	4.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	1.9%	3.2%	1.1%	0.7%	9	8.5%	1.6%	5.5%	2.6%
Moderate	13	12.3%	10.2%	12.7%	8.2%	21	19.8%	14.9%	16.3%	11.5%
Middle	69	65.1%	63.5%	52.6%	54.4%	22	20.8%	22.3%	17.7%	15.5%
Upper	22	20.8%	23.0%	33.5%	36.7%	28	26.4%	31.4%	31.0%	34.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	26	24.5%	29.8%	29.5%	35.6%
Total	*106*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*106*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	3.9%	2.7%	5.9%	4.4%
Moderate	18	23.4%	23.2%	14.7%	22.3%
Middle	36	46.8%	36.4%	47.6%	48.3%
Upper	20	26.0%	37.8%	31.9%	25.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*77*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*45*	58.4%	31.5%	45.6%	34.8%
	By Loan Size				
$100,000 or less	54	70.1%	23.2%	92.5%	36.3%
$100,001-$250,000	12	15.6%	18.4%	4.7%	21.7%
$250,001-$1 Million	11	14.3%	58.4%	2.8%	42.0%
Total	*77*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Hagerstown-Martinsburg, MD-WV (MSA 25180)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.1%	0.5%	1	2.5%	1.4%	4.9%	2.9%
Moderate	11	27.5%	17.4%	14.3%	10.2%	14	35.0%	26.3%	19.7%	14.6%
Middle	18	45.0%	45.5%	52.5%	52.2%	9	22.5%	26.3%	19.4%	19.4%
Upper	11	27.5%	37.0%	32.1%	37.1%	9	22.5%	28.0%	27.1%	35.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	17.5%	18.0%	28.8%	27.2%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	3.2%	1.8%	0.7%	0.4%	0	0.0%	0.0%	3.2%	1.9%
Moderate	4	12.9%	9.1%	9.9%	6.6%	7	22.6%	19.6%	11.3%	7.8%
Middle	13	41.9%	45.3%	51.2%	49.7%	7	22.6%	17.1%	18.3%	15.8%
Upper	13	41.9%	43.8%	38.2%	43.3%	12	38.7%	48.0%	34.6%	39.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	16.1%	15.2%	32.6%	34.8%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.3%	2.6%	5	13.9%	3.9%	8.4%	4.4%
Moderate	5	13.9%	6.9%	12.6%	6.2%	5	13.9%	7.2%	15.8%	15.0%
Middle	24	66.7%	81.8%	54.4%	58.8%	11	30.6%	17.8%	20.9%	10.0%
Upper	7	19.4%	11.3%	30.7%	32.4%	13	36.1%	26.3%	44.2%	50.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.6%	44.8%	10.7%	19.8%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	20.0%	11.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	33.3%	50.3%	60.0%	66.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	5.0%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	66.7%	49.7%	15.0%	22.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	0.9%	0.2%	1.1%	1.2%	6	5.5%	0.3%	4.4%	2.3%
Moderate	21	19.1%	38.2%	12.7%	12.5%	26	23.6%	7.4%	16.1%	10.9%
Middle	55	50.0%	15.5%	51.9%	47.8%	27	24.5%	7.3%	19.0%	16.5%
Upper	33	30.0%	46.0%	34.4%	38.5%	34	30.9%	11.9%	30.8%	35.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	15.5%	73.1%	29.7%	35.0%
Total	*110*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*110*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	3.7%	2.8%	7.1%	5.9%
Moderate	4	4.9%	2.2%	15.0%	15.6%
Middle	45	54.9%	43.7%	48.7%	49.9%
Upper	30	36.6%	51.2%	28.3%	28.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.5%
Total	*82*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*47*	57.3%	24.5%	44.9%	37.5%
	By Loan Size				
$100,000 or less	51	62.2%	17.7%	90.4%	30.1%
$100,001-$250,000	14	17.1%	17.4%	5.4%	20.5%
$250,001-$1 Million	17	20.7%	64.8%	4.3%	49.4%
Total	*82*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Hagerstown-Martinsburg, MD-WV (MSA 25180)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.9%	0.5%	2	3.8%	1.8%	5.0%	2.5%
Moderate	8	15.1%	11.4%	15.7%	10.9%	15	28.3%	18.8%	20.0%	15.1%
Middle	32	60.4%	57.0%	56.1%	56.0%	9	17.0%	19.9%	21.6%	21.7%
Upper	13	24.5%	31.6%	27.3%	32.6%	13	24.5%	32.6%	28.8%	37.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	26.4%	26.9%	24.6%	23.5%
Total	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.8%	1.3%	1	3.2%	1.7%	4.9%	2.7%
Moderate	4	12.9%	10.4%	11.1%	7.8%	4	12.9%	6.1%	12.9%	9.8%
Middle	14	45.2%	41.7%	52.1%	51.0%	5	16.1%	15.0%	18.3%	15.9%
Upper	13	41.9%	47.9%	34.9%	39.9%	12	38.7%	47.8%	39.3%	44.5%
Unknown	0	0.0%	0.0%	0.1%	0.1%	9	29.0%	29.4%	24.6%	27.1%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.0%	0.4%	4	11.8%	28.2%	8.7%	3.9%
Moderate	11	32.4%	44.8%	17.3%	11.3%	17	50.0%	39.5%	26.5%	16.1%
Middle	18	52.9%	43.6%	54.1%	56.7%	9	26.5%	19.0%	23.0%	26.8%
Upper	5	14.7%	11.6%	27.6%	31.5%	4	11.8%	13.4%	37.2%	46.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.6%	6.9%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	22.7%	6.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	59.1%	34.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	9.1%	56.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.1%	2.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.4%	1.0%	7	5.9%	1.6%	5.1%	2.5%
Moderate	23	19.3%	7.9%	14.5%	10.7%	36	30.3%	9.5%	17.8%	12.7%
Middle	65	54.6%	67.0%	54.3%	54.3%	23	19.3%	12.0%	20.4%	19.0%
Upper	31	26.1%	25.1%	29.8%	34.0%	29	24.4%	25.5%	32.7%	38.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	20.2%	51.4%	23.9%	27.3%
Total	*119*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*119*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	7	7.8%	4.1%	7.0%	5.0%
Moderate	15	16.7%	12.6%	14.9%	19.5%
Middle	45	50.0%	54.2%	47.6%	49.1%
Upper	23	25.6%	29.1%	29.0%	25.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.5%
Total	*90*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*46*	51.1%	34.0%	40.8%	39.0%
	By Loan Size				
$100,000 or less	55	61.1%	16.7%	89.4%	29.1%
$100,001-$250,000	18	20.0%	23.1%	5.9%	20.8%
$250,001-$1 Million	17	18.9%	60.3%	4.7%	50.1%
Total	*90*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.8%	0.5%	5	12.5%	7.9%	6.0%	2.9%
Moderate	4	10.0%	8.2%	17.1%	13.2%	21	52.5%	41.9%	20.1%	13.6%
Middle	30	75.0%	63.1%	60.5%	51.4%	6	15.0%	14.7%	18.1%	15.2%
Upper	6	15.0%	28.7%	21.6%	34.9%	6	15.0%	19.8%	35.5%	49.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.0%	15.7%	20.3%	19.0%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.9%	0.3%	9	22.5%	12.2%	9.1%	4.9%
Moderate	7	17.5%	14.5%	13.6%	10.1%	9	22.5%	21.1%	18.1%	11.3%
Middle	26	65.0%	55.1%	60.7%	51.7%	6	15.0%	12.0%	23.7%	17.8%
Upper	7	17.5%	30.4%	24.7%	37.9%	16	40.0%	54.7%	38.9%	56.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.2%	9.9%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	1.8%	10.1%	6.0%
Moderate	5	27.8%	29.3%	15.4%	14.7%	6	33.3%	48.9%	18.8%	15.1%
Middle	10	55.6%	45.1%	66.4%	65.0%	2	11.1%	5.8%	16.8%	12.7%
Upper	3	16.7%	25.6%	18.1%	20.3%	6	33.3%	27.5%	48.3%	59.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	16.7%	16.0%	6.0%	6.9%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	8.3%	45.2%	0	0.0%	0.0%	8.3%	1.5%
Moderate	0	0.0%	0.0%	41.7%	20.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	41.7%	8.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.3%	25.8%	0	0.0%	0.0%	16.7%	0.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	75.0%	97.8%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.8%	2.3%	15	15.3%	9.1%	7.1%	3.5%
Moderate	16	16.3%	12.1%	16.1%	12.7%	36	36.7%	34.4%	19.4%	12.4%
Middle	66	67.3%	58.7%	60.8%	50.0%	14	14.3%	13.0%	19.5%	15.2%
Upper	16	16.3%	29.1%	22.2%	35.0%	28	28.6%	33.8%	37.1%	49.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	5.1%	9.7%	16.9%	19.7%
Total	*98*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*98*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	1.5%	1.1%
Moderate	7	18.4%	7.1%	20.1%	15.9%
Middle	21	55.3%	72.4%	53.3%	56.1%
Upper	10	26.3%	20.5%	23.3%	25.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.9%	1.1%
Total	*38*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*30*	78.9%	38.0%	43.6%	39.1%
	By Loan Size				
$100,000 or less	35	92.1%	37.3%	95.9%	49.3%
$100,001-$250,000	0	0.0%	0.0%	2.1%	13.0%
$250,001-$1 Million	3	7.9%	62.7%	2.0%	37.7%
Total	*38*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.7%	0.4%	1	11.1%	3.5%	3.7%	1.6%
Moderate	0	0.0%	0.0%	18.2%	14.2%	1	11.1%	5.0%	15.7%	9.3%
Middle	5	55.6%	44.9%	59.6%	53.4%	1	11.1%	8.8%	18.0%	13.8%
Upper	4	44.4%	55.1%	21.4%	32.0%	5	55.6%	71.2%	41.0%	57.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	11.1%	11.4%	21.6%	18.2%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.4%	0	0.0%	0.0%	6.0%	2.7%
Moderate	1	14.3%	1.5%	11.0%	7.9%	0	0.0%	0.0%	11.8%	6.2%
Middle	3	42.9%	16.9%	64.5%	51.9%	1	14.3%	3.2%	17.1%	11.3%
Upper	3	42.9%	81.6%	23.7%	39.8%	4	57.1%	18.9%	44.0%	55.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	28.6%	77.9%	21.1%	24.1%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.2%	0.4%	5	38.5%	28.6%	11.5%	3.4%
Moderate	2	15.4%	18.8%	12.7%	6.7%	2	15.4%	9.8%	14.5%	10.8%
Middle	10	76.9%	63.4%	70.3%	51.0%	3	23.1%	26.8%	25.5%	15.2%
Upper	1	7.7%	17.9%	15.8%	41.8%	2	15.4%	30.4%	43.0%	64.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	4.5%	5.5%	6.3%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	16.7%	1.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	50.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	48.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.8%	0.4%	6	20.7%	1.6%	4.9%	2.0%
Moderate	3	10.3%	1.4%	15.5%	12.4%	3	10.3%	1.7%	14.3%	8.1%
Middle	18	62.1%	26.1%	61.8%	52.7%	5	17.2%	5.3%	18.1%	12.8%
Upper	8	27.6%	72.5%	21.8%	34.6%	11	37.9%	34.6%	42.0%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	13.8%	56.9%	20.7%	21.1%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	1.3%	1.4%
Moderate	3	15.8%	12.0%	19.9%	22.1%
Middle	7	36.8%	57.6%	53.5%	52.1%
Upper	9	47.4%	30.4%	22.5%	23.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.8%	1.3%
Total	*19*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*11*	57.9%	38.8%	47.5%	34.2%
	By Loan Size				
$100,000 or less	10	52.6%	9.4%	94.8%	46.2%
$100,001-$250,000	4	21.1%	18.2%	3.1%	17.3%
$250,001-$1 Million	5	26.3%	72.4%	2.1%	36.6%
Total	*19*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.5%	0.3%	1	9.1%	3.0%	5.8%	2.6%
Moderate	0	0.0%	0.0%	10.2%	5.9%	2	18.2%	7.5%	17.7%	11.4%
Middle	5	45.5%	40.4%	61.2%	54.3%	1	9.1%	3.2%	17.5%	14.7%
Upper	6	54.5%	59.6%	28.1%	39.5%	6	54.5%	82.9%	33.3%	49.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	3.5%	25.7%	22.2%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.0%	0.5%	0	0.0%	0.0%	6.0%	3.0%
Moderate	3	30.0%	14.1%	6.3%	3.8%	1	10.0%	5.0%	9.7%	5.5%
Middle	4	40.0%	20.8%	55.2%	50.8%	1	10.0%	3.0%	16.7%	13.5%
Upper	3	30.0%	65.1%	37.6%	45.0%	5	50.0%	77.9%	37.8%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	30.0%	14.1%	29.8%	28.4%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	3.2%	7.8%	2.4%
Moderate	1	12.5%	16.1%	7.2%	3.3%	4	50.0%	50.0%	17.0%	8.2%
Middle	4	50.0%	48.4%	66.7%	48.2%	1	12.5%	14.5%	20.3%	13.8%
Upper	3	37.5%	35.5%	26.1%	48.6%	1	12.5%	16.1%	51.0%	72.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	16.1%	3.9%	2.7%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	95.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	25.0%	0.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	4.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.7%	0.3%	2	6.9%	1.4%	6.0%	2.7%
Moderate	4	13.8%	7.5%	8.4%	6.3%	7	24.1%	6.5%	14.3%	8.5%
Middle	13	44.8%	30.2%	58.9%	51.8%	3	10.3%	3.2%	17.3%	13.9%
Upper	12	41.4%	62.3%	32.0%	41.6%	12	41.4%	79.8%	36.1%	49.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	17.2%	9.1%	26.4%	25.7%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	1.3%	1.4%
Moderate	1	8.3%	29.9%	7.5%	12.5%
Middle	7	58.3%	38.2%	57.0%	51.7%
Upper	4	33.3%	31.9%	34.2%	34.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*12*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*9*	75.0%	15.5%	47.1%	32.5%
	By Loan Size				
$100,000 or less	8	66.7%	7.1%	95.5%	48.7%
$100,001-$250,000	0	0.0%	0.0%	2.2%	12.2%
$250,001-$1 Million	4	33.3%	92.9%	2.4%	39.1%
Total	*12*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.6%	0.4%	4	22.2%	11.7%	6.4%	3.1%
Moderate	3	16.7%	13.5%	8.9%	5.4%	1	5.6%	6.3%	18.7%	12.7%
Middle	10	55.6%	47.2%	59.3%	55.0%	5	27.8%	28.9%	17.6%	15.6%
Upper	5	27.8%	39.3%	31.2%	39.3%	5	27.8%	42.8%	29.4%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	16.7%	10.4%	27.9%	25.1%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.9%	0.4%	0	0.0%	0.0%	5.9%	2.8%
Moderate	1	7.7%	5.9%	6.1%	3.7%	3	23.1%	17.7%	14.7%	8.6%
Middle	9	69.2%	73.3%	55.4%	46.3%	3	23.1%	23.9%	16.4%	12.1%
Upper	3	23.1%	20.8%	37.6%	49.6%	2	15.4%	26.6%	35.4%	52.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	38.5%	31.8%	27.5%	24.2%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.7%	0.0%	4	33.3%	18.0%	7.9%	2.2%
Moderate	2	16.7%	11.7%	3.9%	1.8%	2	16.7%	22.5%	22.4%	14.7%
Middle	7	58.3%	64.0%	60.5%	42.4%	2	16.7%	9.9%	23.0%	9.3%
Upper	3	25.0%	24.3%	34.9%	55.8%	3	25.0%	43.2%	38.2%	58.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	8.3%	6.3%	8.6%	15.3%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	33.3%	71.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	28.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.8%	1.4%	8	18.6%	6.3%	6.3%	2.9%
Moderate	6	14.0%	9.8%	7.5%	4.5%	6	14.0%	12.0%	17.2%	10.7%
Middle	26	60.5%	59.9%	57.7%	49.9%	10	23.3%	26.1%	17.4%	13.6%
Upper	11	25.6%	30.2%	34.1%	44.2%	10	23.3%	35.1%	32.3%	47.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	20.9%	20.5%	26.8%	25.6%
Total	*43*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*43*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	1.1%	1.0%
Moderate	1	7.1%	17.3%	8.0%	8.6%
Middle	6	42.9%	33.2%	54.3%	55.9%
Upper	7	50.0%	49.5%	34.1%	33.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.4%	1.1%
Total	*14*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*5*	35.7%	7.9%	43.5%	30.6%
	By Loan Size				
$100,000 or less	6	42.9%	7.1%	95.5%	43.8%
$100,001-$250,000	2	14.3%	8.1%	2.2%	12.1%
$250,001-$1 Million	6	42.9%	84.8%	2.3%	44.1%
Total	*14*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group A

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.1%	0.7%	1	5.6%	1.4%	5.9%	2.4%
Moderate	2	11.1%	4.4%	6.4%	3.5%	3	16.7%	5.6%	18.5%	11.6%
Middle	5	27.8%	15.9%	59.7%	51.5%	2	11.1%	5.6%	16.4%	13.1%
Upper	11	61.1%	79.7%	32.9%	44.4%	10	55.6%	76.7%	33.3%	50.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	11.1%	10.6%	25.9%	22.5%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.0%	0.7%	1	6.3%	1.6%	6.5%	2.9%
Moderate	1	6.3%	4.4%	6.3%	3.3%	4	25.0%	14.8%	13.9%	8.8%
Middle	9	56.3%	32.3%	58.4%	48.9%	3	18.8%	9.3%	15.5%	11.0%
Upper	6	37.5%	63.3%	34.3%	47.0%	5	31.3%	57.7%	38.4%	54.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	16.6%	25.7%	23.1%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.0%	1.2%	1	12.5%	2.7%	9.0%	4.4%
Moderate	2	25.0%	25.7%	9.7%	3.9%	2	25.0%	24.3%	18.7%	12.0%
Middle	3	37.5%	33.8%	53.0%	47.8%	3	37.5%	35.1%	24.6%	18.9%
Upper	3	37.5%	40.5%	34.3%	47.1%	2	25.0%	37.8%	41.8%	54.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.0%	10.6%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Total	*0*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0*	*0.0%*	*0.0%*	*0.0%*	*0.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.2%	0.7%	3	7.1%	1.5%	6.3%	2.7%
Moderate	5	11.9%	4.6%	6.5%	3.4%	9	21.4%	10.2%	16.8%	10.5%
Middle	17	40.5%	23.9%	58.8%	50.4%	8	19.0%	7.7%	16.6%	12.4%
Upper	20	47.6%	71.5%	33.5%	45.5%	17	40.5%	67.2%	35.7%	52.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	11.9%	13.4%	24.7%	22.5%
Total	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	1.3%	0.7%
Moderate	2	12.5%	32.6%	7.3%	13.0%
Middle	7	43.8%	29.3%	52.8%	54.4%
Upper	7	43.8%	38.1%	34.5%	30.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	4.1%	1.2%
Total	*16*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*8*	50.0%	14.4%	41.9%	36.2%
	By Loan Size				
$100,000 or less	8	50.0%	8.3%	94.0%	36.6%
$100,001-$250,000	2	12.5%	9.8%	2.8%	14.5%
$250,001-$1 Million	6	37.5%	81.9%	3.2%	48.9%
Total	*16*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.9%	2.1%
Moderate	1	25.0%	13.7%	2.7%	1.5%	0	0.0%	0.0%	9.3%	4.9%
Middle	3	75.0%	86.3%	97.3%	98.5%	2	50.0%	49.6%	12.3%	8.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	50.4%	55.5%	71.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.9%	13.2%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	13.3%	6.2%	8.8%	4.3%
Moderate	0	0.0%	0.0%	5.1%	3.6%	4	26.7%	20.8%	20.0%	11.2%
Middle	15	100.0%	100.0%	94.9%	96.4%	1	6.7%	4.8%	18.0%	12.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	8	53.3%	68.1%	43.4%	56.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.8%	15.0%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	11.8%	3.0%	11.6%	3.9%
Moderate	1	5.9%	3.3%	4.7%	2.0%	5	29.4%	23.7%	25.6%	16.3%
Middle	16	94.1%	96.7%	95.3%	98.0%	2	11.8%	3.8%	14.0%	11.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	7	41.2%	61.3%	44.2%	64.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.9%	8.2%	4.7%	4.4%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	4	11.1%	4.4%	7.0%	2.7%
Moderate	2	5.6%	2.6%	3.5%	2.0%	9	25.0%	19.8%	13.2%	6.7%
Middle	34	94.4%	97.4%	96.5%	98.0%	5	13.9%	8.9%	14.1%	9.3%
Upper	0	0.0%	0.0%	0.0%	0.0%	17	47.2%	63.8%	51.1%	67.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.8%	3.1%	14.6%	13.8%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	25.9%	12.1%	4.1%	2.0%
Middle	20	74.1%	87.9%	94.4%	97.6%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.4%
Total	*27*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*19*	70.4%	25.0%	40.8%	28.2%
	By Loan Size				
$100,000 or less	20	74.1%	13.7%	88.8%	28.1%
$100,001-$250,000	4	14.8%	22.0%	6.7%	22.7%
$250,001-$1 Million	3	11.1%	64.2%	4.6%	49.1%
Total	*27*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	0.9%
Moderate	0	0.0%	0.0%	4.1%	2.0%	0	0.0%	0.0%	9.4%	4.5%
Middle	2	100.0%	100.0%	95.9%	98.0%	0	0.0%	0.0%	9.0%	5.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	54.9%	70.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	23.7%	18.9%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.4%	2.2%
Moderate	1	50.0%	56.6%	5.1%	2.8%	2	100.0%	100.0%	13.7%	6.7%
Middle	1	50.0%	43.4%	94.9%	97.2%	0	0.0%	0.0%	18.8%	11.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	46.5%	60.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.6%	18.8%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	9.1%	12.3%	4.9%
Moderate	3	37.5%	30.9%	12.3%	7.5%	4	50.0%	63.6%	24.6%	8.8%
Middle	5	62.5%	69.1%	87.7%	92.5%	3	37.5%	27.3%	17.5%	4.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	36.8%	72.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.8%	9.3%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	8.3%	1.0%	4.1%	1.3%
Moderate	4	33.3%	23.8%	4.9%	2.3%	6	50.0%	43.0%	11.5%	5.2%
Middle	8	66.7%	76.2%	95.1%	97.7%	3	25.0%	3.0%	12.3%	6.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	53.1%	51.4%	67.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	20.6%	19.0%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	11.1%	1.4%	4.7%	1.5%
Middle	16	88.9%	98.6%	93.1%	97.8%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.2%	0.7%
Total	*18*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*13*	72.2%	39.3%	37.3%	25.7%
	By Loan Size				
$100,000 or less	10	55.6%	9.3%	88.5%	27.9%
$100,001-$250,000	2	11.1%	10.0%	6.4%	21.7%
$250,001-$1 Million	6	33.3%	80.8%	5.1%	50.4%
Total	*18*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	21.8%	6.3%	2.2%
Moderate	1	20.0%	28.5%	14.3%	8.5%	0	0.0%	0.0%	9.9%	5.3%
Middle	4	80.0%	71.5%	85.7%	91.5%	2	40.0%	40.1%	16.4%	10.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	38.1%	52.7%	72.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.6%	10.2%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	18.2%	6.7%	6.0%	2.3%
Moderate	2	18.2%	9.2%	16.9%	9.1%	0	0.0%	0.0%	10.9%	5.7%
Middle	9	81.8%	90.8%	83.1%	90.9%	6	54.5%	40.7%	15.4%	10.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	27.3%	52.7%	52.1%	67.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.6%	14.6%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.2%	2.1%
Moderate	1	33.3%	75.0%	18.4%	8.3%	2	66.7%	85.0%	22.4%	7.1%
Middle	2	66.7%	25.0%	81.6%	91.7%	0	0.0%	0.0%	14.3%	3.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	15.0%	42.9%	86.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.2%	0.7%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	4	21.1%	10.5%	6.3%	2.2%
Moderate	4	21.1%	14.7%	15.7%	9.1%	2	10.5%	0.7%	10.9%	5.5%
Middle	15	78.9%	85.3%	84.3%	90.9%	8	42.1%	40.2%	15.9%	9.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	26.3%	48.6%	51.9%	70.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.0%	12.1%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	10.7%	2.8%	20.4%	15.9%
Middle	25	89.3%	97.2%	79.6%	84.1%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*28*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*19*	67.9%	21.0%	39.4%	28.9%
	By Loan Size				
$100,000 or less	18	64.3%	15.1%	90.7%	36.8%
$100,001-$250,000	5	17.9%	18.6%	6.5%	26.4%
$250,001-$1 Million	5	17.9%	66.2%	2.8%	36.7%
Total	*28*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	1.3%
Moderate	1	10.0%	4.3%	14.3%	9.2%	2	20.0%	11.9%	10.6%	5.0%
Middle	9	90.0%	95.7%	85.7%	90.8%	1	10.0%	5.0%	14.1%	9.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	6	60.0%	75.6%	53.7%	69.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	7.5%	18.0%	14.7%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.2%	1.7%
Moderate	2	25.0%	15.5%	16.5%	9.1%	1	12.5%	11.1%	13.3%	6.6%
Middle	6	75.0%	84.5%	83.5%	90.9%	1	12.5%	8.4%	13.6%	9.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	40.8%	48.7%	65.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	39.6%	19.1%	17.2%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.0%	1.8%
Moderate	0	0.0%	0.0%	30.0%	14.6%	1	50.0%	66.7%	33.3%	13.4%
Middle	2	100.0%	100.0%	70.0%	85.4%	1	50.0%	33.3%	18.3%	13.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	31.7%	66.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.7%	5.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	98.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.6%	1.5%
Moderate	3	15.0%	8.5%	16.3%	10.7%	4	20.0%	11.9%	13.2%	5.8%
Middle	17	85.0%	91.5%	83.7%	89.3%	3	15.0%	6.5%	14.2%	9.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	9	45.0%	62.1%	50.2%	66.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	20.0%	19.5%	17.9%	16.7%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	12	37.5%	24.3%	21.2%	13.6%
Middle	20	62.5%	75.7%	76.3%	85.7%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.6%	0.7%
Total	*32*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*24*	75.0%	39.4%	41.3%	35.9%
	By Loan Size				
$100,000 or less	25	78.1%	33.0%	87.9%	30.9%
$100,001-$250,000	5	15.6%	25.2%	6.8%	20.5%
$250,001-$1 Million	2	6.3%	41.8%	5.3%	48.5%
Total	*32*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Maryland - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	5.6%	6.3%	2.1%
Moderate	5	50.0%	52.7%	13.7%	8.3%	2	20.0%	13.1%	9.7%	4.5%
Middle	5	50.0%	47.3%	86.3%	91.7%	2	20.0%	25.9%	13.0%	8.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	30.0%	35.8%	55.6%	72.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	20.0%	19.6%	15.5%	12.3%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.7%	4.0%
Moderate	1	12.5%	4.8%	21.3%	13.6%	2	25.0%	11.6%	14.7%	7.3%
Middle	7	87.5%	95.2%	78.7%	86.4%	1	12.5%	4.9%	16.3%	10.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	25.0%	35.5%	44.7%	65.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	47.9%	16.7%	13.3%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	25.0%	13.6%	12.7%	1.8%
Moderate	2	25.0%	50.0%	23.8%	18.1%	2	25.0%	42.7%	19.0%	10.8%
Middle	6	75.0%	50.0%	76.2%	81.9%	2	25.0%	7.3%	23.8%	20.3%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	25.0%	36.4%	34.9%	63.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.5%	4.0%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	11.5%	2.3%	7.3%	2.8%
Moderate	8	30.8%	22.0%	17.3%	10.5%	6	23.1%	13.1%	12.3%	5.7%
Middle	18	69.2%	78.0%	82.7%	89.5%	5	19.2%	11.9%	15.1%	9.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	7	26.9%	35.6%	49.7%	69.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	19.2%	37.1%	15.6%	12.4%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	24.1%	8.5%	17.3%	15.6%
Middle	22	75.9%	91.5%	79.3%	83.1%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.5%	1.3%
Total	*29*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*18*	62.1%	18.4%	32.2%	23.0%
	By Loan Size				
$100,000 or less	19	65.5%	15.5%	91.3%	34.8%
$100,001-$250,000	6	20.7%	23.8%	4.7%	17.2%
$250,001-$1 Million	4	13.8%	60.7%	4.0%	48.0%
Total	*29*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Boston, MA (MD 14454)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	6.3%	1.2%	4.9%	4.7%	0	0.0%	0.0%	2.9%	1.4%
Moderate	5	31.3%	8.4%	19.7%	17.0%	2	12.5%	2.6%	13.1%	7.5%
Middle	5	31.3%	6.8%	34.0%	27.5%	4	25.0%	4.2%	20.8%	15.7%
Upper	5	31.3%	83.7%	40.8%	49.8%	9	56.3%	18.7%	49.7%	59.5%
Unknown	0	0.0%	0.0%	0.7%	0.9%	1	6.3%	74.6%	13.5%	16.0%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	5.2%	5.4%	0	0.0%	0.0%	5.3%	2.6%
Moderate	2	25.0%	4.8%	20.1%	18.1%	1	12.5%	2.4%	16.1%	10.9%
Middle	2	25.0%	4.4%	32.8%	27.3%	2	25.0%	3.4%	23.6%	18.9%
Upper	4	50.0%	90.8%	41.6%	48.7%	4	50.0%	42.0%	44.3%	53.6%
Unknown	0	0.0%	0.0%	0.4%	0.5%	1	12.5%	52.2%	10.6%	14.1%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.9%	4.7%	0	0.0%	0.0%	4.9%	2.9%
Moderate	0	0.0%	0.0%	16.2%	15.7%	0	0.0%	0.0%	13.4%	8.8%
Middle	0	0.0%	0.0%	34.5%	28.1%	0	0.0%	0.0%	23.6%	16.9%
Upper	0	0.0%	0.0%	45.1%	51.1%	0	0.0%	0.0%	54.2%	61.0%
Unknown	0	0.0%	0.0%	0.3%	0.4%	0	0.0%	0.0%	4.0%	10.4%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	13.9%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	32.0%	21.9%	0	0.0%	0.0%	0.3%	0.0%
Middle	0	0.0%	0.0%	26.6%	33.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.8%	33.8%	0	0.0%	0.0%	1.4%	0.1%
Unknown	0	0.0%	0.0%	1.7%	1.3%	0	0.0%	0.0%	98.3%	99.9%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	4.2%	0.8%	5.0%	5.4%	0	0.0%	0.0%	3.9%	1.6%
Moderate	7	29.2%	7.3%	19.6%	17.9%	3	12.5%	2.5%	14.0%	7.5%
Middle	7	29.2%	6.1%	33.5%	28.2%	6	25.0%	4.0%	21.8%	14.6%
Upper	9	37.5%	85.8%	41.3%	47.6%	13	54.2%	25.5%	47.9%	50.7%
Unknown	0	0.0%	0.0%	0.6%	0.9%	2	8.3%	68.0%	12.4%	25.5%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	5.5%	4.2%
Moderate	3	5.1%	2.7%	16.3%	13.5%
Middle	19	32.2%	35.6%	27.5%	27.6%
Upper	37	62.7%	61.7%	49.0%	52.9%
Unknown	0	0.0%	0.0%	1.0%	1.6%
Tract Unknown	0	0.0%	0.0%	0.6%	0.2%
Total	*59*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*2*	3.4%	4.8%	37.9%	27.8%
	By Loan Size				
$100,000 or less	0	0.0%	0.0%	94.4%	40.5%
$100,001-$250,000	3	5.1%	1.7%	3.0%	15.0%
$250,001-$1 Million	56	94.9%	98.3%	2.6%	44.4%
Total	*59*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Boston, MA (MD 14454)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	7.7%	8.4%	4.9%	4.8%	1	7.7%	3.1%	2.6%	1.1%
Moderate	3	23.1%	20.2%	20.0%	16.6%	1	7.7%	4.4%	13.3%	7.7%
Middle	4	30.8%	28.6%	33.2%	26.9%	2	15.4%	12.1%	21.5%	16.2%
Upper	5	38.5%	42.8%	41.3%	50.7%	7	53.8%	64.7%	50.1%	60.2%
Unknown	0	0.0%	0.0%	0.6%	0.9%	2	15.4%	15.8%	12.5%	14.7%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	5.7%	5.8%	0	0.0%	0.0%	4.6%	2.2%
Moderate	2	18.2%	20.0%	19.9%	17.2%	1	9.1%	6.8%	15.2%	9.9%
Middle	7	63.6%	55.1%	35.3%	29.1%	3	27.3%	28.4%	24.7%	19.6%
Upper	2	18.2%	25.0%	38.7%	47.3%	3	27.3%	33.4%	44.1%	54.3%
Unknown	0	0.0%	0.0%	0.5%	0.6%	4	36.4%	31.4%	11.3%	14.0%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.5%	5.3%	0	0.0%	0.0%	3.3%	1.2%
Moderate	0	0.0%	0.0%	15.8%	15.9%	0	0.0%	0.0%	12.6%	7.4%
Middle	0	0.0%	0.0%	33.3%	26.1%	0	0.0%	0.0%	22.9%	15.8%
Upper	0	0.0%	0.0%	46.1%	52.4%	0	0.0%	0.0%	54.1%	61.3%
Unknown	0	0.0%	0.0%	0.4%	0.3%	0	0.0%	0.0%	7.0%	14.3%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	33.3%	6.3%	16.1%	8.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.9%	25.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	28.8%	34.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	66.7%	93.7%	21.0%	31.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.2%	0.1%	3	100.0%	100.0%	100.0%	100.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	7.4%	6.2%	5.2%	5.5%	1	3.7%	0.1%	3.3%	1.3%
Moderate	5	18.5%	1.6%	19.7%	17.8%	2	7.4%	0.4%	13.8%	7.5%
Middle	11	40.7%	3.1%	33.9%	28.3%	5	18.5%	1.5%	22.6%	15.4%
Upper	9	33.3%	89.1%	40.5%	47.7%	10	37.0%	4.1%	47.7%	52.0%
Unknown	0	0.0%	0.0%	0.5%	0.7%	9	33.3%	93.8%	12.6%	23.7%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	5.6%	5.8%
Moderate	4	6.2%	3.9%	16.3%	13.9%
Middle	26	40.0%	46.6%	27.2%	27.4%
Upper	35	53.8%	49.5%	49.1%	51.1%
Unknown	0	0.0%	0.0%	1.1%	1.5%
Tract Unknown	0	0.0%	0.0%	0.6%	0.3%
Total	*65*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*11*	16.9%	10.0%	46.1%	34.1%
	By Loan Size				
$100,000 or less	4	6.2%	0.8%	94.3%	38.9%
$100,001-$250,000	9	13.8%	4.4%	2.8%	13.4%
$250,001-$1 Million	52	80.0%	94.9%	3.0%	47.8%
Total	*65*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Boston, MA (MD 14454)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	6.4%	6.4%	0	0.0%	0.0%	2.9%	1.2%
Moderate	2	15.4%	10.9%	14.3%	12.1%	1	7.7%	5.4%	13.1%	7.5%
Middle	7	53.8%	42.0%	37.6%	28.8%	3	23.1%	14.6%	21.3%	15.7%
Upper	4	30.8%	47.1%	41.7%	52.7%	7	53.8%	73.7%	49.4%	59.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	15.4%	6.4%	13.4%	16.1%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	7.7%	1.0%	5.5%	5.4%	1	7.7%	3.2%	2.9%	1.4%
Moderate	4	30.8%	30.0%	13.6%	11.5%	0	0.0%	0.0%	11.2%	7.0%
Middle	5	38.5%	35.1%	36.8%	30.4%	2	15.4%	14.2%	22.0%	17.3%
Upper	3	23.1%	33.9%	44.0%	52.7%	3	23.1%	40.2%	51.0%	60.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	53.8%	42.4%	12.9%	13.5%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.9%	5.4%	0	0.0%	0.0%	2.8%	1.2%
Moderate	0	0.0%	0.0%	12.6%	11.0%	0	0.0%	0.0%	10.7%	5.7%
Middle	2	66.7%	61.9%	36.3%	26.8%	0	0.0%	0.0%	22.9%	15.9%
Upper	1	33.3%	38.1%	46.2%	56.7%	2	66.7%	69.9%	55.9%	65.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	30.1%	7.8%	12.1%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	16.7%	3.4%	15.9%	13.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	33.3%	14.4%	32.8%	16.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	50.0%	82.2%	25.3%	28.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	26.0%	41.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	5.7%	3.0%	6.0%	6.5%	1	2.9%	0.1%	2.8%	1.2%
Moderate	8	22.9%	14.5%	14.0%	12.2%	1	2.9%	0.4%	11.8%	6.6%
Middle	17	48.6%	77.3%	37.0%	29.3%	5	14.3%	1.6%	21.5%	15.1%
Upper	8	22.9%	5.2%	43.1%	52.0%	12	34.3%	7.9%	50.2%	55.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	45.7%	90.0%	13.6%	21.6%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.5%	7.1%
Moderate	2	6.7%	3.4%	12.3%	10.8%
Middle	10	33.3%	27.6%	31.6%	30.7%
Upper	18	60.0%	69.1%	48.0%	49.9%
Unknown	0	0.0%	0.0%	0.6%	1.4%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*30*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*3*	10.0%	12.3%	44.4%	32.3%
	By Loan Size				
$100,000 or less	1	3.3%	0.6%	93.9%	37.8%
$100,001-$250,000	2	6.7%	2.8%	2.9%	13.9%
$250,001-$1 Million	27	90.0%	96.6%	3.2%	48.4%
Total	*30*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Boston, MA (MD 14454)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	11.5%	12.4%	6.7%	6.3%	0	0.0%	0.0%	2.5%	1.1%
Moderate	8	30.8%	31.8%	14.1%	11.7%	5	19.2%	15.9%	13.3%	7.8%
Middle	8	30.8%	26.0%	37.1%	29.0%	7	26.9%	30.4%	20.2%	15.3%
Upper	7	26.9%	29.9%	42.0%	52.9%	9	34.6%	39.5%	45.1%	55.6%
Unknown	0	0.0%	0.0%	0.0%	0.1%	5	19.2%	14.2%	18.9%	20.2%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	7.7%	5.6%	5.8%	5.3%	0	0.0%	0.0%	2.7%	1.3%
Moderate	3	23.1%	30.9%	13.6%	11.5%	2	15.4%	14.7%	11.0%	6.9%
Middle	5	38.5%	37.0%	36.3%	29.5%	1	7.7%	10.0%	20.8%	16.3%
Upper	4	30.8%	26.5%	44.4%	53.6%	4	30.8%	32.6%	45.5%	54.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	46.2%	42.7%	20.0%	20.7%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.8%	4.8%	0	0.0%	0.0%	3.3%	1.3%
Moderate	0	0.0%	0.0%	13.8%	11.9%	0	0.0%	0.0%	11.6%	6.1%
Middle	0	0.0%	0.0%	35.7%	24.9%	0	0.0%	0.0%	23.8%	14.9%
Upper	1	100.0%	100.0%	45.7%	58.4%	1	100.0%	100.0%	52.7%	62.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.6%	15.4%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	18.6%	23.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	16.5%	27.6%	15.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	31.5%	27.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	50.0%	83.5%	22.2%	33.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	9.1%	1.4%	6.2%	7.2%	0	0.0%	0.0%	2.7%	1.1%
Moderate	13	29.5%	18.4%	14.0%	11.9%	7	15.9%	2.1%	11.9%	6.7%
Middle	13	29.5%	4.0%	36.5%	28.9%	8	18.2%	3.3%	20.5%	14.5%
Upper	14	31.8%	76.1%	43.3%	51.9%	14	31.8%	5.6%	45.4%	51.2%
Unknown	0	0.0%	0.0%	0.0%	0.1%	15	34.1%	88.9%	19.4%	26.5%
Total	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.6%	6.9%
Moderate	2	6.1%	3.0%	11.7%	8.8%
Middle	17	51.5%	59.3%	31.5%	32.3%
Upper	14	42.4%	37.8%	47.7%	50.4%
Unknown	0	0.0%	0.0%	0.8%	1.3%
Tract Unknown	0	0.0%	0.0%	0.7%	0.4%
Total	*33*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*3*	9.1%	1.5%	47.4%	30.1%
	By Loan Size				
$100,000 or less	2	6.1%	0.7%	93.2%	35.3%
$100,001-$250,000	2	6.1%	1.2%	3.1%	13.8%
$250,001-$1 Million	29	87.9%	98.0%	3.7%	50.9%
Total	*33*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Boston, MA (MD 14454)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	5.9%	5.3%	5.8%	5.2%	0	0.0%	0.0%	2.6%	1.2%
Moderate	7	20.6%	22.3%	14.4%	11.6%	0	0.0%	0.0%	12.9%	7.6%
Middle	14	41.2%	36.7%	36.4%	28.9%	0	0.0%	0.0%	19.9%	15.1%
Upper	11	32.4%	35.7%	43.3%	54.1%	2	5.9%	5.8%	44.5%	55.2%
Unknown	0	0.0%	0.0%	0.1%	0.1%	32	94.1%	94.2%	20.1%	20.9%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	15.4%	14.1%	6.0%	5.7%	0	0.0%	0.0%	4.7%	2.4%
Moderate	7	53.8%	53.4%	14.6%	12.3%	0	0.0%	0.0%	12.3%	7.7%
Middle	2	15.4%	16.6%	37.6%	30.9%	0	0.0%	0.0%	22.0%	17.4%
Upper	2	15.4%	15.9%	41.7%	51.0%	0	0.0%	0.0%	43.1%	53.5%
Unknown	0	0.0%	0.0%	0.0%	0.1%	13	100.0%	100.0%	18.0%	19.0%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.6%	5.2%	0	0.0%	0.0%	3.9%	1.2%
Moderate	0	0.0%	0.0%	13.0%	11.4%	0	0.0%	0.0%	13.5%	7.1%
Middle	1	50.0%	48.4%	35.9%	27.7%	0	0.0%	0.0%	22.7%	13.8%
Upper	1	50.0%	51.6%	46.5%	55.7%	0	0.0%	0.0%	49.3%	52.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	10.6%	25.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	18.5%	19.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	30.6%	24.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	100.0%	100.0%	27.1%	38.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	23.8%	17.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	7.4%	0.6%	5.9%	6.7%	0	0.0%	0.0%	3.5%	1.5%
Moderate	14	25.9%	2.4%	14.5%	13.0%	0	0.0%	0.0%	12.6%	6.9%
Middle	22	40.7%	94.1%	36.8%	30.4%	0	0.0%	0.0%	20.8%	14.5%
Upper	14	25.9%	2.8%	42.7%	49.9%	2	3.7%	0.4%	43.9%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.1%	52	96.3%	99.6%	19.3%	27.5%
Total	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.6%	7.8%
Moderate	2	5.7%	2.6%	12.1%	10.1%
Middle	19	54.3%	63.5%	30.5%	30.3%
Upper	14	40.0%	33.9%	48.2%	49.9%
Unknown	0	0.0%	0.0%	0.7%	1.5%
Tract Unknown	0	0.0%	0.0%	0.9%	0.4%
Total	*35*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*2*	5.7%	0.9%	43.9%	33.4%
	By Loan Size				
$100,000 or less	2	5.7%	0.8%	93.5%	32.4%
$100,001-$250,000	2	5.7%	1.4%	2.8%	13.0%
$250,001-$1 Million	31	88.6%	97.8%	3.7%	54.6%
Total	*35*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Trenton-Princeton, NJ (MSA 45940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	3.2%	1.0%	1	8.3%	3.6%	10.2%	4.7%
Moderate	3	25.0%	11.8%	17.3%	10.1%	5	41.7%	21.8%	22.4%	15.1%
Middle	5	41.7%	33.1%	36.9%	30.9%	1	8.3%	6.7%	18.2%	16.4%
Upper	4	33.3%	55.1%	42.7%	58.0%	5	41.7%	68.0%	34.2%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	15.0%	14.1%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	16.7%	2.8%	2.8%	1.1%	1	16.7%	6.4%	7.8%	4.3%
Moderate	1	16.7%	3.3%	11.8%	6.9%	0	0.0%	0.0%	16.4%	10.6%
Middle	2	33.3%	19.4%	34.8%	28.0%	2	33.3%	6.0%	21.1%	17.6%
Upper	2	33.3%	74.6%	50.6%	64.0%	3	50.0%	87.6%	42.7%	56.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.0%	11.4%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.9%	1.0%	0	0.0%	0.0%	7.0%	4.8%
Moderate	0	0.0%	0.0%	9.1%	6.3%	0	0.0%	0.0%	13.9%	10.5%
Middle	0	0.0%	0.0%	30.2%	22.2%	0	0.0%	0.0%	22.6%	15.5%
Upper	3	100.0%	100.0%	58.8%	70.6%	3	100.0%	100.0%	51.5%	62.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.0%	6.9%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	32.4%	19.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	35.1%	30.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	27.0%	49.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	5.4%	0.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	4.5%	0.8%	3.1%	2.8%	2	9.1%	4.1%	9.3%	4.2%
Moderate	5	22.7%	14.0%	15.2%	11.0%	5	22.7%	12.8%	19.9%	12.5%
Middle	7	31.8%	25.4%	35.7%	31.6%	3	13.6%	5.8%	19.3%	15.1%
Upper	9	40.9%	59.8%	46.0%	54.6%	11	50.0%	71.3%	37.8%	47.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.5%	6.0%	13.8%	21.0%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	6.0%	6.8%
Moderate	0	0.0%	0.0%	13.9%	13.8%
Middle	10	50.0%	63.6%	30.4%	34.8%
Upper	10	50.0%	36.4%	48.9%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.9%	0.8%
Total	*20*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*14*	70.0%	24.4%	41.2%	30.5%
	By Loan Size				
$100,000 or less	13	65.0%	11.8%	94.8%	43.7%
$100,001-$250,000	2	10.0%	9.2%	2.6%	13.1%
$250,001-$1 Million	5	25.0%	79.1%	2.7%	43.2%
Total	*20*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Trenton-Princeton, NJ (MSA 45940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	9.5%	4.6%	2.7%	0.8%	6	28.6%	17.6%	9.7%	4.1%
Moderate	7	33.3%	23.8%	17.5%	9.9%	2	9.5%	5.9%	20.0%	13.0%
Middle	4	19.0%	23.3%	33.9%	26.4%	7	33.3%	33.9%	18.7%	16.3%
Upper	8	38.1%	48.3%	45.9%	62.8%	5	23.8%	37.3%	35.6%	53.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.8%	5.3%	16.0%	13.2%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	4.1%	1.6%	0	0.0%	0.0%	6.1%	2.7%
Moderate	1	14.3%	6.8%	15.5%	9.1%	0	0.0%	0.0%	13.9%	8.6%
Middle	4	57.1%	44.5%	34.4%	28.2%	0	0.0%	0.0%	18.4%	14.8%
Upper	2	28.6%	48.6%	46.0%	61.1%	3	42.9%	59.8%	40.9%	55.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	57.1%	40.2%	20.7%	18.1%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.6%	0.9%	0	0.0%	0.0%	8.5%	4.0%
Moderate	0	0.0%	0.0%	16.9%	8.4%	0	0.0%	0.0%	14.5%	5.7%
Middle	0	0.0%	0.0%	32.8%	26.1%	0	0.0%	0.0%	18.9%	10.3%
Upper	0	0.0%	0.0%	46.7%	64.5%	0	0.0%	0.0%	53.0%	69.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.2%	10.5%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	20.7%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	34.5%	26.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	27.6%	27.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	17.2%	44.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	7.1%	3.1%	3.2%	1.1%	6	21.4%	11.9%	8.5%	3.3%
Moderate	8	28.6%	18.3%	16.9%	11.3%	2	7.1%	4.0%	17.7%	10.4%
Middle	8	28.6%	30.2%	34.0%	27.0%	7	25.0%	22.8%	18.5%	14.2%
Upper	10	35.7%	48.4%	45.8%	60.7%	8	28.6%	44.6%	38.0%	49.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	17.9%	16.7%	17.3%	22.6%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	5.7%	5.2%
Moderate	1	10.0%	10.9%	14.5%	14.6%
Middle	5	50.0%	51.3%	31.0%	31.7%
Upper	4	40.0%	37.8%	48.0%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.5%
Total	*10*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*4*	40.0%	20.6%	45.8%	29.0%
	By Loan Size				
$100,000 or less	1	10.0%	0.9%	94.4%	42.8%
$100,001-$250,000	4	40.0%	14.5%	2.8%	14.2%
$250,001-$1 Million	5	50.0%	84.5%	2.8%	43.0%
Total	*10*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Trenton-Princeton, NJ (MSA 45940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	8.8%	4.2%	2.8%	1.0%	9	26.5%	15.3%	8.2%	3.4%
Moderate	10	29.4%	18.6%	11.4%	5.7%	13	38.2%	39.4%	18.8%	11.6%
Middle	18	52.9%	65.6%	39.8%	28.2%	5	14.7%	17.3%	17.6%	14.4%
Upper	3	8.8%	11.5%	46.1%	65.0%	1	2.9%	6.3%	38.3%	56.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	17.6%	21.7%	17.1%	14.1%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	6.3%	3.6%	2.3%	0.9%	0	0.0%	0.0%	4.2%	1.9%
Moderate	4	25.0%	16.1%	8.1%	4.3%	1	6.3%	3.4%	10.5%	6.0%
Middle	3	18.8%	10.3%	34.2%	23.8%	1	6.3%	4.3%	16.4%	12.1%
Upper	8	50.0%	70.1%	55.4%	70.9%	7	43.8%	64.5%	48.4%	62.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	43.8%	27.8%	20.4%	17.3%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.9%	0.7%	0	0.0%	0.0%	7.6%	2.2%
Moderate	0	0.0%	0.0%	9.8%	1.8%	0	0.0%	0.0%	19.5%	8.2%
Middle	0	0.0%	0.0%	40.4%	26.7%	0	0.0%	0.0%	23.6%	19.4%
Upper	0	0.0%	0.0%	45.0%	70.9%	0	0.0%	0.0%	44.7%	61.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.6%	8.2%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	55.6%	41.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.1%	3.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	5.6%	26.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	27.8%	28.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	7.8%	1.1%	2.8%	2.7%	9	17.6%	2.4%	6.4%	2.6%
Moderate	14	27.5%	5.0%	9.9%	5.0%	14	27.5%	6.5%	15.1%	8.6%
Middle	22	43.1%	83.1%	37.3%	26.2%	6	11.8%	3.2%	17.3%	12.9%
Upper	11	21.6%	10.8%	50.1%	66.2%	8	15.7%	9.3%	43.0%	56.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	27.5%	78.6%	18.2%	19.0%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.6%	9.1%
Moderate	0	0.0%	0.0%	10.4%	10.5%
Middle	1	11.1%	9.1%	26.3%	28.1%
Upper	8	88.9%	90.9%	55.8%	52.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*9*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*4*	44.4%	32.5%	43.4%	28.8%
	By Loan Size				
$100,000 or less	3	33.3%	8.7%	94.8%	43.8%
$100,001-$250,000	3	33.3%	23.3%	2.5%	12.8%
$250,001-$1 Million	3	33.3%	68.1%	2.7%	43.3%
Total	*9*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Trenton-Princeton, NJ (MSA 45940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	9.1%	6.0%	3.3%	1.2%	13	39.4%	25.5%	10.7%	4.4%
Moderate	15	45.5%	36.6%	11.5%	5.5%	8	24.2%	21.3%	18.4%	11.8%
Middle	9	27.3%	25.6%	36.4%	25.5%	2	6.1%	4.0%	17.8%	15.3%
Upper	6	18.2%	31.8%	48.8%	67.8%	9	27.3%	48.3%	34.3%	52.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.0%	0.9%	18.8%	16.5%
Total	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	5.6%	1.5%	2.6%	1.0%	0	0.0%	0.0%	5.8%	2.5%
Moderate	3	16.7%	6.5%	10.1%	5.6%	2	11.1%	4.2%	11.4%	7.1%
Middle	6	33.3%	18.7%	33.9%	24.8%	0	0.0%	0.0%	15.6%	12.6%
Upper	8	44.4%	73.2%	53.4%	68.6%	6	33.3%	60.8%	40.8%	52.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	55.6%	35.0%	26.4%	25.1%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.4%	1.1%	0	0.0%	0.0%	11.4%	3.0%
Moderate	0	0.0%	0.0%	11.4%	3.3%	0	0.0%	0.0%	20.9%	7.4%
Middle	0	0.0%	0.0%	37.0%	17.5%	0	0.0%	0.0%	20.3%	12.2%
Upper	0	0.0%	0.0%	47.2%	78.1%	0	0.0%	0.0%	42.1%	63.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.4%	13.5%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	17.4%	3.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	13.0%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	26.1%	41.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	43.5%	54.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	7.8%	3.6%	3.1%	1.3%	13	25.5%	12.0%	8.4%	3.2%
Moderate	18	35.3%	20.6%	10.8%	5.1%	10	19.6%	12.2%	15.1%	8.7%
Middle	15	29.4%	22.0%	35.2%	26.4%	2	3.9%	1.9%	16.8%	12.8%
Upper	14	27.5%	53.7%	50.9%	67.2%	15	29.4%	54.9%	37.6%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	21.6%	19.0%	22.1%	27.1%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.2%	8.9%
Moderate	0	0.0%	0.0%	9.7%	11.0%
Middle	3	50.0%	23.0%	26.7%	23.5%
Upper	3	50.0%	77.0%	55.4%	56.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.1%	0.5%
Total	*6*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*4*	66.7%	37.8%	47.9%	31.9%
	By Loan Size				
$100,000 or less	1	16.7%	2.4%	94.0%	39.7%
$100,001-$250,000	1	16.7%	7.2%	2.7%	12.2%
$250,001-$1 Million	4	66.7%	90.4%	3.3%	48.1%
Total	*6*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Trenton-Princeton, NJ (MSA 45940)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	9.1%	3.7%	2.6%	1.1%	9	40.9%	19.0%	9.2%	3.8%
Moderate	10	45.5%	30.3%	11.6%	5.7%	8	36.4%	41.8%	19.1%	12.2%
Middle	7	31.8%	43.8%	37.5%	26.1%	2	9.1%	10.8%	17.4%	15.1%
Upper	3	13.6%	22.2%	48.3%	67.1%	1	4.5%	7.8%	36.3%	53.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	9.1%	20.7%	18.0%	15.1%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	5.9%	4.2%	3.5%	1.5%	0	0.0%	0.0%	7.8%	3.9%
Moderate	3	17.6%	13.7%	12.0%	7.0%	1	5.9%	2.4%	13.4%	9.4%
Middle	11	64.7%	69.5%	37.9%	29.5%	0	0.0%	0.0%	18.3%	16.1%
Upper	2	11.8%	12.5%	46.7%	62.0%	0	0.0%	0.0%	33.4%	47.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	94.1%	97.6%	27.1%	23.4%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.6%	1.0%	0	0.0%	0.0%	8.8%	2.8%
Moderate	0	0.0%	0.0%	12.2%	6.4%	0	0.0%	0.0%	15.3%	7.1%
Middle	0	0.0%	0.0%	40.4%	29.9%	0	0.0%	0.0%	18.2%	15.6%
Upper	0	0.0%	0.0%	42.8%	62.7%	0	0.0%	0.0%	31.1%	52.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	26.5%	21.5%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	25.0%	17.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	17.9%	24.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	39.3%	49.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	17.9%	9.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	7.3%	3.1%	3.2%	3.2%	9	22.0%	7.6%	8.6%	3.4%
Moderate	13	31.7%	17.4%	11.8%	8.4%	9	22.0%	17.7%	16.4%	9.6%
Middle	18	43.9%	44.0%	37.9%	30.1%	2	4.9%	4.3%	17.8%	13.6%
Upper	7	17.1%	35.6%	47.2%	58.3%	1	2.4%	3.1%	34.6%	45.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	48.8%	67.3%	22.6%	28.3%
Total	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	6.6%	7.9%
Moderate	0	0.0%	0.0%	9.1%	11.0%
Middle	5	45.5%	32.5%	26.4%	27.2%
Upper	6	54.5%	67.5%	56.6%	53.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.6%
Total	*11*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*8*	72.7%	82.7%	43.1%	30.2%
	By Loan Size				
$100,000 or less	4	36.4%	14.4%	94.0%	41.4%
$100,001-$250,000	5	45.5%	37.2%	3.0%	14.4%
$250,001-$1 Million	2	18.2%	48.4%	3.1%	44.2%
Total	*11*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Atlantic City-Hammonton, NJ (MSA 12100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.3%	1.4%	1	11.1%	3.7%	4.8%	2.4%
Moderate	1	11.1%	3.7%	14.9%	9.9%	0	0.0%	0.0%	18.6%	12.1%
Middle	2	22.2%	11.1%	38.8%	36.4%	3	33.3%	15.5%	19.5%	16.1%
Upper	6	66.7%	85.2%	42.9%	51.0%	4	44.4%	64.4%	38.6%	50.9%
Unknown	0	0.0%	0.0%	1.2%	1.3%	1	11.1%	16.5%	18.4%	18.5%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.3%	0.7%	1	16.7%	3.8%	5.1%	2.4%
Moderate	0	0.0%	0.0%	10.4%	7.2%	0	0.0%	0.0%	13.8%	8.5%
Middle	0	0.0%	0.0%	37.7%	32.0%	0	0.0%	0.0%	19.9%	15.1%
Upper	6	100.0%	100.0%	48.9%	58.4%	5	83.3%	96.2%	46.4%	59.3%
Unknown	0	0.0%	0.0%	1.7%	1.7%	0	0.0%	0.0%	14.9%	14.8%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.2%	3.1%	0	0.0%	0.0%	4.3%	2.7%
Moderate	0	0.0%	0.0%	13.7%	11.4%	0	0.0%	0.0%	14.6%	8.9%
Middle	0	0.0%	0.0%	35.5%	33.4%	0	0.0%	0.0%	22.4%	18.1%
Upper	0	0.0%	0.0%	46.5%	51.0%	0	0.0%	0.0%	48.5%	55.0%
Unknown	0	0.0%	0.0%	1.1%	1.1%	0	0.0%	0.0%	10.1%	15.3%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	13.3%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	40.0%	72.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	6.7%	10.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	40.0%	10.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	2.1%	1.5%	2	13.3%	3.7%	4.8%	2.3%
Moderate	1	6.7%	2.1%	13.9%	11.8%	0	0.0%	0.0%	17.3%	10.7%
Middle	2	13.3%	6.2%	38.3%	34.3%	3	20.0%	8.7%	19.8%	15.3%
Upper	12	80.0%	91.7%	44.5%	51.0%	9	60.0%	78.4%	40.9%	50.9%
Unknown	0	0.0%	0.0%	1.3%	1.5%	1	6.7%	9.2%	17.3%	20.8%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	9.2%	7.5%
Moderate	0	0.0%	0.0%	17.9%	21.5%
Middle	0	0.0%	0.0%	31.0%	26.8%
Upper	7	100.0%	100.0%	39.7%	43.1%
Unknown	0	0.0%	0.0%	1.1%	0.4%
Tract Unknown	0	0.0%	0.0%	1.0%	0.8%
Total	*7*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*3*	42.9%	50.4%	38.9%	34.7%
	By Loan Size				
$100,000 or less	2	28.6%	5.9%	95.6%	46.2%
$100,001-$250,000	2	28.6%	17.8%	2.4%	15.4%
$250,001-$1 Million	3	42.9%	76.3%	1.9%	38.4%
Total	*7*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Atlantic City-Hammonton, NJ (MSA 12100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.3%	1.3%	1	5.0%	1.6%	3.7%	1.6%
Moderate	5	25.0%	18.5%	15.6%	10.5%	5	25.0%	22.3%	16.5%	10.3%
Middle	11	55.0%	49.9%	39.1%	36.2%	2	10.0%	7.8%	18.7%	15.1%
Upper	4	20.0%	31.6%	41.8%	50.7%	3	15.0%	29.5%	41.5%	55.1%
Unknown	0	0.0%	0.0%	1.2%	1.4%	9	45.0%	38.7%	19.7%	17.9%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.7%	0.9%	0	0.0%	0.0%	4.0%	2.0%
Moderate	2	28.6%	35.1%	12.4%	8.4%	0	0.0%	0.0%	11.9%	6.9%
Middle	2	28.6%	22.1%	39.2%	36.0%	1	14.3%	10.4%	19.2%	14.0%
Upper	3	42.9%	42.8%	45.7%	52.7%	3	42.9%	48.7%	40.7%	53.2%
Unknown	0	0.0%	0.0%	1.0%	1.9%	3	42.9%	40.9%	24.2%	24.0%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.2%	0.8%	0	0.0%	0.0%	5.4%	2.2%
Moderate	0	0.0%	0.0%	11.2%	6.1%	0	0.0%	0.0%	14.1%	8.7%
Middle	1	100.0%	100.0%	42.6%	41.2%	0	0.0%	0.0%	20.8%	13.9%
Upper	0	0.0%	0.0%	42.9%	50.2%	0	0.0%	0.0%	57.6%	70.4%
Unknown	0	0.0%	0.0%	1.1%	1.7%	1	100.0%	100.0%	2.2%	4.8%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	33.3%	17.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	13.3%	14.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	40.0%	56.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.3%	11.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	2.2%	1.8%	1	3.4%	0.2%	3.8%	1.6%
Moderate	7	24.1%	3.2%	14.5%	10.0%	5	17.2%	2.2%	15.1%	8.9%
Middle	15	51.7%	92.1%	39.4%	37.2%	3	10.3%	1.2%	18.9%	14.1%
Upper	7	24.1%	4.7%	42.8%	49.6%	6	20.7%	4.8%	42.2%	52.7%
Unknown	0	0.0%	0.0%	1.1%	1.5%	14	48.3%	91.8%	19.9%	22.6%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	10.0%	10.3%
Moderate	1	20.0%	2.0%	19.7%	22.6%
Middle	0	0.0%	0.0%	30.0%	26.4%
Upper	4	80.0%	98.0%	38.5%	39.9%
Unknown	0	0.0%	0.0%	0.9%	0.2%
Tract Unknown	0	0.0%	0.0%	0.9%	0.7%
Total	*5*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*3*	60.0%	57.9%	41.0%	36.6%
	By Loan Size				
$100,000 or less	3	60.0%	14.1%	95.6%	44.9%
$100,001-$250,000	0	0.0%	0.0%	2.1%	12.6%
$250,001-$1 Million	2	40.0%	85.9%	2.3%	42.5%
Total	*5*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Atlantic City-Hammonton, NJ (MSA 12100)

Income Categories	HMDA By Tract Income: Bank #	Bank %	Bank % $(000s)	Aggregate %	Aggregate % $(000s)	HMDA By Borrower Income: Bank #	Bank %	Bank % $(000s)	Aggregate %	Aggregate % $(000s)
				Home Purchase						
Low	0	0.0%	0.0%	1.7%	0.9%	0	0.0%	0.0%	3.4%	1.4%
Moderate	4	33.3%	21.3%	11.6%	9.9%	1	8.3%	4.8%	13.7%	8.0%
Middle	4	33.3%	49.2%	54.6%	49.7%	2	16.7%	13.3%	19.1%	14.7%
Upper	4	33.3%	29.5%	32.1%	39.5%	2	16.7%	37.1%	43.7%	54.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	58.3%	44.7%	20.2%	21.0%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
				Refinance						
Low	0	0.0%	0.0%	0.8%	0.5%	0	0.0%	0.0%	2.8%	1.2%
Moderate	1	8.3%	4.1%	9.4%	5.9%	0	0.0%	0.0%	7.0%	4.0%
Middle	9	75.0%	57.6%	52.7%	50.2%	0	0.0%	0.0%	14.8%	10.2%
Upper	2	16.7%	38.3%	37.1%	43.3%	3	25.0%	53.0%	45.1%	55.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	75.0%	47.0%	30.3%	28.7%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
				Home Improvement						
Low	0	0.0%	0.0%	0.3%	0.0%	1	100.0%	100.0%	6.0%	1.2%
Moderate	0	0.0%	0.0%	11.1%	5.1%	0	0.0%	0.0%	9.5%	4.8%
Middle	1	100.0%	100.0%	52.8%	52.3%	0	0.0%	0.0%	23.1%	16.9%
Upper	0	0.0%	0.0%	35.9%	42.6%	0	0.0%	0.0%	57.0%	55.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.3%	21.1%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
				Multi-Family						
Low	1	100.0%	100.0%	36.4%	41.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	36.4%	51.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	9.1%	1.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	18.2%	5.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
				HMDA Totals						
Low	1	3.8%	38.4%	1.3%	1.1%	1	3.8%	0.0%	3.3%	1.3%
Moderate	5	19.2%	6.2%	10.8%	8.6%	1	3.8%	1.0%	10.9%	6.3%
Middle	14	53.8%	33.7%	53.7%	49.5%	2	7.7%	2.8%	17.7%	12.9%
Upper	6	23.1%	21.7%	34.2%	40.8%	5	19.2%	29.3%	44.9%	54.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	65.4%	66.9%	23.2%	24.7%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income: Bank #	Bank %	Bank % $(000s)	Aggregate %	Aggregate % $(000s)
Low	1	11.1%	5.8%	8.7%	9.6%
Moderate	1	11.1%	1.0%	15.2%	12.8%
Middle	2	22.2%	5.5%	49.3%	52.0%
Upper	5	55.6%	87.8%	26.7%	25.4%
Unknown	0	0.0%	0.0%	0.2%	0.1%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*9*	100.0%	100.0%	100.0%	100.0%
			By Revenue		
$1 Million or Less	*4*	44.4%	22.9%	38.0%	34.7%
			By Loan Size		
$100,000 or less	2	22.2%	2.3%	95.9%	42.9%
$100,001-$250,000	3	33.3%	15.3%	1.9%	11.9%
$250,001-$1 Million	4	44.4%	82.3%	2.2%	45.3%
Total	*9*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Atlantic City-Hammonton, NJ (MSA 12100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	16.7%	10.9%	1.7%	1.0%	2	16.7%	8.7%	4.7%	1.9%
Moderate	1	8.3%	3.4%	12.5%	8.0%	1	8.3%	5.7%	14.1%	8.9%
Middle	5	41.7%	36.4%	53.0%	51.2%	1	8.3%	8.9%	18.1%	14.9%
Upper	4	33.3%	49.3%	32.7%	39.8%	2	16.7%	28.1%	37.3%	49.9%
Unknown	0	0.0%	0.0%	0.1%	0.0%	6	50.0%	48.7%	25.7%	24.3%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.2%	0.9%	0	0.0%	0.0%	3.9%	2.2%
Moderate	5	22.7%	11.8%	10.8%	7.3%	1	4.5%	2.3%	9.7%	5.9%
Middle	13	59.1%	52.8%	51.8%	49.4%	1	4.5%	3.6%	15.8%	12.0%
Upper	4	18.2%	35.4%	36.2%	42.4%	3	13.6%	46.0%	37.8%	46.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	77.3%	48.1%	32.8%	33.5%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.8%	0.5%	0	0.0%	0.0%	5.6%	2.4%
Moderate	0	0.0%	0.0%	10.2%	6.5%	0	0.0%	0.0%	17.6%	10.7%
Middle	1	100.0%	100.0%	51.3%	43.0%	1	100.0%	100.0%	22.7%	17.0%
Upper	0	0.0%	0.0%	37.7%	50.0%	0	0.0%	0.0%	47.1%	62.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.0%	7.2%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	26.7%	10.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	40.0%	63.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	26.7%	14.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	3.3%	0.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	3.3%	11.3%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	5.7%	3.0%	1.6%	2.2%	2	5.7%	2.4%	4.4%	1.8%
Moderate	6	17.1%	9.4%	11.8%	14.9%	2	5.7%	3.3%	12.4%	6.6%
Middle	19	54.3%	48.3%	52.3%	45.5%	3	8.6%	5.3%	17.3%	11.9%
Upper	8	22.9%	39.2%	34.3%	35.9%	5	14.3%	40.9%	37.9%	42.4%
Unknown	0	0.0%	0.0%	0.0%	1.5%	23	65.7%	48.2%	28.0%	37.3%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	33.3%	3.6%	6.0%	6.8%
Moderate	0	0.0%	0.0%	12.4%	11.0%
Middle	2	66.7%	96.4%	52.3%	52.4%
Upper	0	0.0%	0.0%	28.1%	29.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.8%
Total	*3*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*2*	66.7%	39.8%	48.1%	36.7%
	By Loan Size				
$100,000 or less	1	33.3%	3.6%	95.2%	41.5%
$100,001-$250,000	0	0.0%	0.0%	2.3%	11.9%
$250,001-$1 Million	2	66.7%	96.4%	2.6%	46.6%
Total	*3*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Atlantic City-Hammonton, NJ (MSA 12100)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.7%	1.2%	0	0.0%	0.0%	4.4%	2.0%
Moderate	1	7.7%	1.9%	11.8%	7.3%	0	0.0%	0.0%	16.5%	10.9%
Middle	7	53.8%	66.7%	55.8%	52.7%	0	0.0%	0.0%	20.8%	18.4%
Upper	5	38.5%	31.4%	30.6%	38.9%	1	7.7%	28.1%	33.7%	47.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	92.3%	71.9%	24.6%	21.6%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.7%	1.1%	0	0.0%	0.0%	5.8%	3.1%
Moderate	2	10.0%	4.2%	11.9%	8.6%	2	10.0%	4.0%	12.3%	8.3%
Middle	14	70.0%	36.2%	54.8%	50.5%	0	0.0%	0.0%	18.0%	14.4%
Upper	4	20.0%	59.6%	31.6%	39.8%	1	5.0%	3.3%	36.9%	46.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	85.0%	92.7%	27.0%	27.9%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.1%	1.1%	0	0.0%	0.0%	6.6%	2.0%
Moderate	0	0.0%	0.0%	8.9%	4.9%	0	0.0%	0.0%	13.2%	10.3%
Middle	1	100.0%	100.0%	60.7%	63.3%	0	0.0%	0.0%	21.5%	18.1%
Upper	0	0.0%	0.0%	29.2%	30.7%	0	0.0%	0.0%	47.6%	51.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	11.2%	18.5%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	8.3%	1.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	61.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	26.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	9.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.7%	1.2%	0	0.0%	0.0%	5.1%	2.4%
Moderate	3	8.8%	3.3%	11.7%	9.6%	2	5.9%	2.6%	14.6%	9.5%
Middle	22	64.7%	48.2%	55.7%	51.2%	0	0.0%	0.0%	19.7%	16.2%
Upper	9	26.5%	48.5%	30.9%	38.0%	2	5.9%	11.2%	35.7%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	30	88.2%	86.2%	24.9%	26.6%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	5.7%	8.7%
Moderate	0	0.0%	0.0%	11.4%	10.8%
Middle	4	100.0%	100.0%	52.3%	55.7%
Upper	0	0.0%	0.0%	29.1%	23.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.8%
Total	*4*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*1*	25.0%	17.5%	44.0%	37.4%
	By Loan Size				
$100,000 or less	1	25.0%	2.8%	94.6%	38.7%
$100,001-$250,000	2	50.0%	27.0%	2.6%	13.6%
$250,001-$1 Million	1	25.0%	70.2%	2.9%	47.7%
Total	*4*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Buffalo-Cheektowaga-Niagara Falls, NY (MSA 15380)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	114	6.0%	3.4%	4.9%	2.8%	272	14.4%	6.9%	9.8%	5.5%
Moderate	209	11.0%	7.0%	10.2%	6.7%	629	33.2%	22.5%	25.9%	18.9%
Middle	862	45.5%	38.9%	45.5%	39.3%	331	17.5%	17.0%	23.1%	22.0%
Upper	706	37.3%	50.2%	39.4%	51.1%	432	22.8%	37.6%	29.7%	41.5%
Unknown	3	0.2%	0.6%	0.0%	0.1%	230	12.1%	15.9%	11.4%	12.1%
Total	*1,894*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,894*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	34	3.0%	3.0%	3.2%	2.2%	126	11.1%	6.7%	10.6%	6.5%
Moderate	98	8.6%	5.4%	8.3%	5.6%	216	19.0%	13.8%	20.8%	15.8%
Middle	473	41.7%	35.8%	43.5%	37.4%	277	24.4%	20.8%	25.9%	23.9%
Upper	530	46.7%	55.8%	44.9%	54.7%	434	38.2%	49.3%	35.7%	46.1%
Unknown	0	0.0%	0.0%	0.1%	0.1%	82	7.2%	9.4%	7.1%	7.7%
Total	*1,135*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,135*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	43	5.4%	3.3%	3.9%	2.6%	81	10.2%	6.7%	9.5%	7.0%
Moderate	73	9.1%	8.8%	7.8%	6.4%	138	17.3%	12.7%	19.0%	15.4%
Middle	317	39.7%	33.3%	43.4%	39.0%	201	25.2%	21.7%	26.5%	24.0%
Upper	365	45.7%	54.7%	45.0%	52.0%	300	37.6%	50.2%	39.7%	48.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	78	9.8%	8.6%	5.3%	5.1%
Total	*798*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*798*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	11.8%	41.7%	15.6%	8.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	35.3%	20.3%	21.1%	8.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	47.1%	37.6%	42.7%	29.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	5.9%	0.4%	19.1%	27.9%	0	0.0%	0.0%	2.0%	0.3%
Unknown	0	0.0%	0.0%	1.5%	25.7%	17	100.0%	100.0%	98.0%	99.7%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	193	5.0%	6.5%	4.4%	3.4%	479	12.5%	6.3%	9.9%	5.0%
Moderate	386	10.0%	7.9%	9.5%	6.7%	983	25.6%	17.3%	23.5%	15.4%
Middle	1,660	43.2%	37.4%	44.7%	37.6%	809	21.0%	17.0%	24.1%	19.4%
Upper	1,602	41.7%	47.9%	41.4%	48.7%	1,166	30.3%	38.7%	32.3%	37.1%
Unknown	3	0.1%	0.3%	0.0%	3.5%	407	10.6%	20.6%	10.1%	23.1%
Total	*3,844*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3,844*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	132	10.4%	11.0%	8.8%	11.0%
Moderate	168	13.3%	13.5%	11.1%	14.2%
Middle	429	33.9%	26.0%	36.1%	29.5%
Upper	490	38.8%	44.9%	41.1%	41.7%
Unknown	45	3.6%	4.5%	2.2%	3.2%
Tract Unknown	0	0.0%	0.0%	0.8%	0.3%
Total	*1,264*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*682*	54.0%	23.7%	44.0%	29.3%
	By Loan Size				
$100,000 or less	820	64.9%	11.9%	91.8%	30.8%
$100,001-$250,000	198	15.7%	18.5%	4.3%	17.7%
$250,001-$1 Million	246	19.5%	69.6%	3.9%	51.5%
Total	*1,264*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Buffalo-Cheektowaga-Niagara Falls, NY (MSA 15380)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	126	6.9%	3.4%	4.5%	2.4%	190	10.4%	4.6%	7.6%	3.9%
Moderate	190	10.4%	6.0%	10.7%	6.8%	515	28.1%	17.5%	21.5%	15.2%
Middle	841	45.9%	40.1%	46.0%	40.0%	369	20.1%	18.9%	21.6%	20.3%
Upper	672	36.7%	50.2%	38.7%	50.7%	463	25.3%	39.8%	29.9%	42.2%
Unknown	3	0.2%	0.3%	0.1%	0.1%	295	16.1%	19.1%	19.5%	18.4%
Total	*1,832*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,832*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	12	2.7%	1.5%	2.8%	1.5%	30	6.9%	3.5%	7.7%	4.0%
Moderate	39	8.9%	6.5%	8.3%	5.0%	82	18.8%	12.8%	17.9%	11.9%
Middle	195	44.6%	36.8%	46.7%	37.1%	116	26.5%	22.6%	24.6%	20.4%
Upper	191	43.7%	55.3%	42.2%	56.4%	161	36.8%	48.7%	36.3%	42.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	48	11.0%	12.3%	13.5%	21.4%
Total	*437*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*437*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	57	15.5%	10.0%	7.9%	3.4%	74	20.1%	6.1%	12.2%	5.4%
Moderate	59	16.0%	16.5%	11.5%	7.0%	102	27.7%	14.7%	22.1%	13.9%
Middle	155	42.1%	42.5%	46.0%	43.5%	93	25.3%	15.0%	22.9%	22.1%
Upper	97	26.4%	31.0%	34.7%	46.1%	77	20.9%	45.7%	38.7%	53.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	6.0%	18.5%	4.1%	4.9%
Total	*368*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*368*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	3	10.7%	52.8%	10.5%	22.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	7.1%	0.9%	17.5%	7.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	15	53.6%	27.1%	51.8%	27.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	8	28.6%	19.2%	19.3%	42.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.9%	0.4%	28	100.0%	100.0%	100.0%	100.0%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	198	7.4%	10.3%	4.5%	3.7%	294	11.0%	3.8%	8.0%	3.7%
Moderate	290	10.9%	5.6%	10.2%	6.5%	699	26.2%	14.2%	20.6%	13.3%
Middle	1,206	45.3%	37.7%	46.2%	38.5%	578	21.7%	16.7%	22.3%	18.9%
Upper	968	36.3%	46.1%	39.0%	51.2%	701	26.3%	35.7%	32.0%	39.4%
Unknown	3	0.1%	0.2%	0.0%	0.1%	393	14.7%	29.6%	17.1%	24.7%
Total	*2,665*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,665*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	94	10.5%	11.7%	8.7%	10.8%
Moderate	113	12.6%	10.1%	11.3%	11.9%
Middle	280	31.3%	27.7%	36.2%	32.4%
Upper	380	42.5%	44.3%	40.7%	40.1%
Unknown	28	3.1%	6.2%	2.4%	4.5%
Tract Unknown	0	0.0%	0.0%	0.6%	0.3%
Total	*895*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*438*	48.9%	25.0%	49.5%	30.4%
	By Loan Size				
$100,000 or less	408	45.6%	8.0%	91.9%	29.6%
$100,001-$250,000	208	23.2%	19.0%	3.8%	15.6%
$250,001-$1 Million	279	31.2%	73.0%	4.3%	54.8%
Total	*895*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Buffalo-Cheektowaga-Niagara Falls, NY (MSA 15380)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	65	3.1%	1.6%	2.2%	1.3%	220	10.6%	4.7%	7.8%	4.1%
Moderate	286	13.8%	9.9%	11.2%	7.5%	513	24.7%	15.2%	22.3%	15.9%
Middle	907	43.6%	35.5%	45.7%	37.7%	462	22.2%	20.8%	23.3%	22.0%
Upper	821	39.5%	53.0%	40.9%	53.5%	553	26.6%	41.4%	29.4%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	331	15.9%	18.0%	17.1%	15.8%
Total	*2,079*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,079*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	12	1.9%	1.0%	2.1%	0.9%	16	2.5%	1.5%	5.6%	2.9%
Moderate	47	7.3%	5.9%	9.4%	5.9%	94	14.5%	10.0%	15.2%	11.0%
Middle	259	40.0%	33.4%	39.5%	32.8%	133	20.6%	18.4%	23.0%	20.6%
Upper	329	50.9%	59.8%	49.1%	60.4%	225	34.8%	46.1%	36.6%	47.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	179	27.7%	24.0%	19.6%	18.4%
Total	*647*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*647*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	24	8.9%	4.0%	5.5%	3.5%	42	15.6%	3.8%	11.6%	4.6%
Moderate	56	20.7%	15.1%	13.8%	9.0%	88	32.6%	18.5%	23.7%	14.0%
Middle	111	41.1%	28.5%	43.1%	35.0%	76	28.1%	23.9%	22.6%	19.3%
Upper	79	29.3%	52.4%	37.7%	52.5%	53	19.6%	38.8%	38.6%	55.5%
Unknown	0	0.0%	0.0%	0.1%	0.0%	11	4.1%	14.9%	3.5%	6.6%
Total	*270*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*270*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	3	20.0%	52.3%	10.9%	8.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	6.7%	0.3%	25.8%	11.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	33.3%	21.3%	36.7%	44.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	6	40.0%	26.2%	26.6%	36.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	100.0%	100.0%	100.0%	100.0%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	104	3.5%	2.5%	2.5%	1.7%	278	9.2%	3.9%	7.5%	3.6%
Moderate	390	13.0%	8.9%	11.0%	7.4%	695	23.1%	13.8%	20.4%	13.7%
Middle	1,282	42.6%	34.7%	43.8%	36.8%	671	22.3%	19.9%	23.1%	20.3%
Upper	1,235	41.0%	53.9%	42.7%	54.1%	831	27.6%	41.6%	31.9%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	536	17.8%	20.8%	17.1%	21.3%
Total	*3,011*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3,011*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	86	7.8%	9.7%	7.0%	8.3%
Moderate	192	17.3%	18.3%	13.9%	16.7%
Middle	410	37.0%	32.2%	38.6%	35.8%
Upper	420	37.9%	39.7%	40.5%	39.2%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*1,108*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*563*	50.8%	28.1%	46.5%	30.9%
	By Loan Size				
$100,000 or less	578	52.2%	9.6%	92.0%	29.5%
$100,001-$250,000	206	18.6%	15.3%	3.7%	14.9%
$250,001-$1 Million	324	29.2%	75.1%	4.3%	55.6%
Total	*1,108*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Buffalo-Cheektowaga-Niagara Falls, NY (MSA 15380)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	86	3.9%	2.0%	2.2%	1.2%	274	12.5%	5.4%	9.3%	4.9%
Moderate	302	13.7%	8.7%	11.7%	7.4%	638	29.0%	18.5%	24.5%	17.6%
Middle	983	44.7%	34.0%	44.8%	36.1%	418	19.0%	18.9%	22.0%	21.2%
Upper	828	37.7%	55.3%	41.2%	55.3%	505	23.0%	35.7%	26.6%	39.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	364	16.6%	21.5%	17.6%	16.6%
Total	*2,199*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,199*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	10	2.0%	1.6%	1.8%	1.2%	27	5.3%	3.4%	7.2%	4.1%
Moderate	38	7.5%	6.6%	8.9%	5.8%	96	18.9%	13.5%	18.3%	12.9%
Middle	222	43.7%	34.4%	42.1%	34.9%	112	22.0%	19.2%	23.9%	21.5%
Upper	238	46.9%	57.4%	47.2%	58.1%	186	36.6%	45.7%	34.4%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	87	17.1%	18.2%	16.2%	17.1%
Total	*508*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*508*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	15	5.7%	2.1%	5.8%	2.7%	43	16.2%	4.3%	13.8%	5.4%
Moderate	54	20.4%	7.7%	15.4%	7.3%	74	27.9%	13.0%	25.7%	15.7%
Middle	118	44.5%	42.0%	42.7%	37.7%	70	26.4%	22.1%	23.9%	23.4%
Upper	78	29.4%	48.1%	36.0%	52.3%	62	23.4%	41.7%	32.1%	49.7%
Unknown	0	0.0%	0.0%	0.1%	0.0%	16	6.0%	18.9%	4.5%	5.7%
Total	*265*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*265*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	5	23.8%	14.9%	17.6%	7.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.7%	2.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	7	33.3%	17.6%	40.4%	29.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	9	42.9%	67.5%	27.2%	60.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	100.0%	100.0%	100.0%	100.0%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	116	3.9%	3.8%	2.5%	2.0%	344	11.5%	4.3%	9.1%	4.1%
Moderate	394	13.2%	7.1%	11.3%	6.5%	808	27.0%	15.0%	22.9%	14.4%
Middle	1,330	44.4%	31.8%	44.0%	35.0%	600	20.0%	16.2%	22.5%	18.7%
Upper	1,153	38.5%	57.3%	42.2%	56.5%	753	25.2%	32.2%	28.9%	36.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	488	16.3%	32.3%	16.6%	26.7%
Total	*2,993*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,993*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	85	8.5%	9.9%	6.6%	7.8%
Moderate	170	17.1%	19.9%	13.2%	17.3%
Middle	376	37.8%	34.5%	39.2%	37.1%
Upper	364	36.6%	35.7%	39.9%	37.5%
Unknown	0	0.0%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	1.0%	0.3%
Total	*995*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*462*	46.4%	24.5%	47.2%	32.1%
	By Loan Size				
$100,000 or less	403	40.5%	7.0%	91.9%	28.3%
$100,001-$250,000	231	23.2%	15.9%	3.6%	14.2%
$250,001-$1 Million	361	36.3%	77.1%	4.6%	57.5%
Total	*995*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Buffalo-Cheektowaga-Niagara Falls, NY (MSA 15380)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	77	3.8%	2.4%	2.1%	1.2%	156	7.6%	3.3%	6.9%	3.4%
Moderate	257	12.6%	7.5%	12.0%	7.5%	568	27.8%	16.0%	23.8%	16.2%
Middle	944	46.2%	36.4%	44.3%	36.0%	373	18.3%	17.5%	22.4%	21.0%
Upper	765	37.4%	53.6%	41.6%	55.3%	530	25.9%	40.1%	31.0%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	416	20.4%	23.1%	16.0%	15.0%
Total	*2,043*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,043*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	6	1.6%	0.8%	1.8%	1.0%	13	3.4%	1.7%	6.2%	3.3%
Moderate	43	11.2%	7.7%	10.6%	6.8%	59	15.4%	10.5%	17.5%	12.5%
Middle	164	42.7%	36.3%	44.8%	38.4%	85	22.1%	18.2%	23.2%	20.5%
Upper	171	44.5%	55.2%	42.7%	53.8%	167	43.5%	55.8%	35.3%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	60	15.6%	13.8%	17.8%	17.8%
Total	*384*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*384*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	21	8.7%	2.3%	6.4%	4.8%	42	17.4%	3.9%	12.6%	4.7%
Moderate	43	17.8%	14.1%	15.4%	7.7%	60	24.8%	14.3%	25.3%	16.7%
Middle	118	48.8%	55.6%	46.4%	44.2%	61	25.2%	20.7%	22.2%	20.7%
Upper	60	24.8%	27.9%	31.8%	43.3%	70	28.9%	52.1%	34.9%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	3.7%	9.1%	5.0%	7.8%
Total	*242*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*242*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	7.7%	0.0%	7.5%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.4%	6.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	61.5%	8.2%	38.3%	20.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	30.8%	91.8%	30.8%	71.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	100.0%	100.0%	100.0%	100.0%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	105	3.9%	2.0%	2.5%	1.2%	211	7.9%	2.8%	7.2%	3.1%
Moderate	343	12.8%	7.1%	12.0%	7.3%	687	25.6%	13.9%	22.3%	13.9%
Middle	1,234	46.0%	34.5%	44.6%	35.2%	519	19.4%	16.3%	22.5%	18.9%
Upper	1,000	37.3%	56.5%	40.8%	56.2%	767	28.6%	39.4%	32.3%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	498	18.6%	27.6%	15.8%	23.5%
Total	*2,682*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2,682*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	72	7.8%	9.1%	6.1%	7.3%
Moderate	160	17.3%	18.3%	13.6%	18.7%
Middle	371	40.1%	38.8%	38.5%	38.4%
Upper	321	34.7%	33.7%	40.5%	35.1%
Unknown	1	0.1%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	1.2%	0.4%
Total	*925*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*399*	43.1%	20.2%	41.0%	25.7%
	By Loan Size				
$100,000 or less	419	45.3%	8.3%	93.0%	29.7%
$100,001-$250,000	199	21.5%	16.1%	3.2%	14.5%
$250,001-$1 Million	307	33.2%	75.6%	3.8%	55.8%
Total	*925*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Rochester, NY (MSA 40380)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	32	5.3%	5.2%	2.5%	1.4%	118	19.4%	10.9%	9.2%	4.9%
Moderate	124	20.4%	11.7%	11.2%	7.1%	276	45.5%	33.0%	24.6%	18.0%
Middle	294	48.4%	43.5%	50.3%	44.8%	95	15.7%	18.0%	22.3%	21.2%
Upper	157	25.9%	39.6%	36.0%	46.7%	101	16.6%	33.3%	32.7%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	2.8%	4.8%	11.2%	10.6%
Total	*607*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*607*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	7	1.9%	0.6%	2.7%	2.1%	53	14.0%	6.3%	10.2%	6.1%
Moderate	27	7.1%	2.9%	9.3%	7.0%	84	22.2%	11.4%	21.6%	16.0%
Middle	187	49.5%	60.7%	51.3%	47.2%	86	22.8%	13.7%	24.7%	22.2%
Upper	157	41.5%	35.8%	36.6%	43.7%	145	38.4%	36.4%	37.6%	46.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	2.6%	32.2%	6.0%	9.7%
Total	*378*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*378*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	7	3.0%	1.3%	2.6%	1.5%	23	9.9%	6.6%	7.7%	6.1%
Moderate	12	5.2%	2.5%	9.7%	7.0%	62	26.7%	19.9%	19.7%	15.2%
Middle	111	47.8%	45.1%	50.5%	45.8%	54	23.3%	21.9%	25.4%	21.9%
Upper	102	44.0%	51.0%	37.1%	45.5%	85	36.6%	47.6%	45.3%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.1%	8	3.4%	4.0%	1.9%	1.8%
Total	*232*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*232*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	24.1%	6.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	14.3%	2.3%	28.7%	10.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	57.1%	55.7%	36.8%	63.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	28.6%	42.0%	10.3%	19.2%	0	0.0%	0.0%	2.3%	1.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	100.0%	100.0%	97.7%	98.4%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	46	3.7%	2.1%	2.7%	1.9%	194	15.8%	6.3%	9.3%	4.9%
Moderate	165	13.4%	5.9%	10.6%	7.3%	422	34.3%	16.6%	23.3%	16.3%
Middle	600	48.7%	52.1%	50.5%	46.6%	235	19.1%	12.1%	23.1%	19.9%
Upper	420	34.1%	39.9%	36.2%	44.1%	331	26.9%	26.2%	35.0%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	49	4.0%	38.8%	9.3%	16.2%
Total	*1,231*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,231*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	83	9.2%	10.1%	7.5%	8.3%
Moderate	81	9.0%	9.2%	12.4%	10.9%
Middle	387	42.9%	40.7%	43.1%	42.9%
Upper	351	38.9%	39.3%	35.9%	37.3%
Unknown	1	0.1%	0.6%	0.1%	0.3%
Tract Unknown	0	0.0%	0.0%	1.0%	0.3%
Total	*903*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*473*	52.4%	25.3%	44.6%	29.5%
	By Loan Size				
$100,000 or less	567	62.8%	11.6%	92.3%	32.9%
$100,001-$250,000	147	16.3%	17.3%	3.8%	15.6%
$250,001-$1 Million	189	20.9%	71.1%	3.9%	51.4%
Total	*903*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Rochester, NY (MSA 40380)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	27	3.9%	1.9%	2.4%	1.5%	116	16.6%	8.6%	7.6%	4.2%
Moderate	102	14.6%	9.2%	11.9%	7.5%	226	32.4%	23.0%	20.7%	15.1%
Middle	365	52.3%	46.6%	50.7%	44.9%	162	23.2%	24.6%	22.0%	20.6%
Upper	204	29.2%	42.3%	35.0%	46.1%	138	19.8%	34.7%	32.8%	45.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	56	8.0%	9.0%	16.9%	14.9%
Total	*698*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*698*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	0.9%	0.4%	2.5%	1.6%	14	13.2%	9.3%	7.5%	4.2%
Moderate	8	7.5%	3.5%	10.4%	6.8%	16	15.1%	11.0%	17.6%	12.5%
Middle	68	64.2%	60.1%	53.1%	47.6%	24	22.6%	17.4%	23.6%	20.5%
Upper	29	27.4%	36.0%	34.0%	43.9%	44	41.5%	56.9%	39.0%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	7.5%	5.4%	12.4%	12.6%
Total	*106*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*106*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	10	6.2%	3.8%	2.8%	1.2%	28	17.4%	7.4%	10.2%	4.4%
Moderate	13	8.1%	8.0%	15.6%	11.3%	49	30.4%	21.9%	22.5%	12.8%
Middle	93	57.8%	47.7%	53.3%	49.1%	55	34.2%	36.8%	27.1%	22.3%
Upper	44	27.3%	40.4%	28.3%	38.3%	25	15.5%	24.9%	38.0%	51.7%
Unknown	1	0.6%	0.1%	0.0%	0.0%	4	2.5%	9.0%	2.1%	8.8%
Total	*161*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*161*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	40.0%	74.7%	17.5%	14.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	8.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	60.0%	25.3%	39.2%	44.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	18.3%	32.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	40	4.1%	31.3%	2.5%	3.2%	158	16.3%	5.2%	7.8%	3.6%
Moderate	123	12.7%	4.9%	12.1%	7.6%	291	30.0%	12.6%	20.1%	12.6%
Middle	529	54.5%	39.2%	51.5%	45.5%	241	24.8%	14.2%	22.9%	18.0%
Upper	277	28.6%	24.6%	33.8%	43.7%	207	21.3%	22.5%	34.7%	40.5%
Unknown	1	0.1%	0.0%	0.0%	0.0%	73	7.5%	45.6%	14.4%	25.3%
Total	*970*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*970*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	74	10.6%	12.0%	8.1%	9.9%
Moderate	63	9.1%	8.7%	11.5%	13.2%
Middle	279	40.1%	45.0%	44.2%	41.9%
Upper	278	40.0%	33.6%	35.3%	34.4%
Unknown	1	0.1%	0.6%	0.1%	0.2%
Tract Unknown	0	0.0%	0.0%	0.8%	0.3%
Total	*695*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*337*	48.5%	26.7%	48.8%	30.9%
	By Loan Size				
$100,000 or less	340	48.9%	10.0%	91.6%	30.6%
$100,001-$250,000	148	21.3%	17.8%	4.0%	15.2%
$250,001-$1 Million	207	29.8%	72.1%	4.4%	54.2%
Total	*695*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Rochester, NY (MSA 40380)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	26	3.3%	1.6%	2.1%	1.6%	114	14.5%	8.2%	8.4%	4.5%
Moderate	93	11.8%	6.7%	8.9%	5.5%	298	37.9%	26.6%	21.8%	15.8%
Middle	515	65.5%	64.8%	56.8%	49.8%	169	21.5%	20.5%	22.4%	20.7%
Upper	152	19.3%	26.8%	32.2%	43.1%	123	15.6%	26.1%	32.9%	45.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	82	10.4%	18.6%	14.4%	13.4%
Total	*786*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*786*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	1.5%	0.9%	1.7%	1.1%	5	2.5%	1.1%	6.1%	3.3%
Moderate	2	1.0%	0.5%	8.1%	4.9%	31	15.4%	9.6%	16.5%	11.2%
Middle	116	57.7%	60.2%	53.5%	47.1%	39	19.4%	15.6%	23.3%	19.6%
Upper	80	39.8%	38.4%	36.7%	46.9%	51	25.4%	29.4%	38.9%	51.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	75	37.3%	44.2%	15.2%	14.8%
Total	*201*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*201*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	6	5.9%	1.8%	2.4%	0.9%	22	21.8%	7.4%	11.2%	5.0%
Moderate	16	15.8%	12.5%	12.7%	7.3%	23	22.8%	12.0%	23.6%	13.5%
Middle	61	60.4%	47.5%	61.3%	55.1%	30	29.7%	18.5%	27.5%	18.9%
Upper	18	17.8%	38.2%	23.6%	36.7%	23	22.8%	46.9%	35.4%	55.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	3.0%	15.2%	2.4%	7.5%
Total	*101*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*101*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	8.7%	21.3%	20.6%	17.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	8.7%	0.6%	18.6%	10.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	15	65.2%	58.8%	42.3%	56.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	17.4%	19.2%	18.6%	15.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	100.0%	100.0%	100.0%	100.0%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	37	3.3%	10.3%	2.1%	2.7%	141	12.7%	3.5%	8.1%	3.9%
Moderate	113	10.2%	3.1%	9.2%	5.8%	352	31.7%	12.1%	20.6%	13.4%
Middle	707	63.6%	61.3%	56.4%	49.7%	238	21.4%	10.6%	23.2%	18.7%
Upper	254	22.9%	25.2%	32.3%	41.8%	197	17.7%	15.1%	34.6%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	183	16.5%	58.7%	13.5%	20.4%
Total	*1,111*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,111*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	95	11.1%	12.2%	7.9%	10.8%
Moderate	84	9.8%	7.9%	9.1%	9.0%
Middle	369	43.3%	39.5%	49.6%	45.3%
Upper	303	35.5%	39.7%	33.3%	34.7%
Unknown	2	0.2%	0.7%	0.1%	0.3%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*853*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*441*	51.7%	27.6%	44.2%	31.1%
	By Loan Size				
$100,000 or less	414	48.5%	7.7%	91.3%	28.5%
$100,001-$250,000	174	20.4%	15.8%	4.1%	15.4%
$250,001-$1 Million	265	31.1%	76.5%	4.6%	56.0%
Total	*853*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Rochester, NY (MSA 40380)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	20	2.2%	1.0%	2.0%	1.0%	162	17.4%	6.8%	9.0%	4.8%
Moderate	102	11.0%	5.4%	8.8%	5.2%	349	37.6%	21.7%	23.6%	17.5%
Middle	571	61.5%	67.9%	56.6%	50.7%	198	21.3%	19.2%	22.1%	21.2%
Upper	236	25.4%	25.7%	32.6%	43.1%	152	16.4%	21.6%	29.1%	41.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	68	7.3%	30.8%	16.2%	15.4%
Total	*929*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*929*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	1.3%	0.4%	2.5%	1.8%	8	5.1%	3.4%	7.2%	3.8%
Moderate	10	6.3%	3.6%	7.8%	4.6%	35	22.2%	15.7%	18.9%	13.7%
Middle	77	48.7%	40.5%	54.2%	48.0%	33	20.9%	16.6%	22.5%	19.1%
Upper	69	43.7%	55.5%	35.4%	45.6%	65	41.1%	55.0%	37.3%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	10.8%	9.2%	14.1%	14.8%
Total	*158*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*158*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	6	5.0%	2.7%	2.9%	1.2%	28	23.5%	18.6%	12.8%	5.3%
Moderate	24	20.2%	11.6%	12.9%	7.4%	39	32.8%	25.5%	25.5%	16.2%
Middle	60	50.4%	52.7%	61.2%	56.9%	31	26.1%	31.4%	25.6%	21.8%
Upper	28	23.5%	32.8%	23.0%	34.5%	20	16.8%	22.9%	33.1%	50.3%
Unknown	1	0.8%	0.3%	0.0%	0.0%	1	0.8%	1.7%	3.1%	6.3%
Total	*119*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*119*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	7.1%	14.4%	17.6%	13.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	21.4%	4.8%	20.8%	8.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	10	35.7%	37.6%	42.4%	45.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	10	35.7%	43.2%	19.2%	33.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	28	100.0%	100.0%	100.0%	100.0%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	30	2.4%	8.2%	2.3%	2.4%	198	16.0%	3.0%	9.0%	4.2%
Moderate	142	11.5%	5.0%	9.2%	5.4%	423	34.3%	9.7%	22.6%	14.9%
Middle	718	58.2%	49.8%	56.5%	49.6%	262	21.2%	8.8%	22.6%	18.7%
Upper	343	27.8%	37.1%	32.0%	42.6%	237	19.2%	12.2%	31.5%	39.3%
Unknown	1	0.1%	0.0%	0.0%	0.0%	114	9.2%	66.3%	14.4%	22.9%
Total	*1,234*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,234*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	91	10.8%	14.3%	8.3%	12.3%
Moderate	80	9.5%	8.7%	9.2%	8.0%
Middle	371	44.1%	44.8%	48.4%	45.8%
Upper	298	35.4%	31.7%	32.6%	33.2%
Unknown	1	0.1%	0.5%	0.1%	0.4%
Tract Unknown	0	0.0%	0.0%	1.3%	0.4%
Total	*841*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*383*	45.5%	23.5%	42.8%	30.1%
	By Loan Size				
$100,000 or less	393	46.7%	8.2%	91.0%	27.4%
$100,001-$250,000	170	20.2%	14.8%	4.1%	15.1%
$250,001-$1 Million	278	33.1%	77.0%	4.9%	57.5%
Total	*841*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Rochester, NY (MSA 40380)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	37	3.9%	2.5%	1.9%	1.1%	116	12.2%	5.7%	8.2%	4.4%
Moderate	153	16.1%	8.6%	9.6%	5.7%	300	31.5%	19.6%	23.0%	16.8%
Middle	557	58.4%	60.0%	55.4%	48.6%	128	13.4%	15.1%	20.5%	19.2%
Upper	206	21.6%	28.9%	33.1%	44.5%	133	14.0%	24.7%	30.2%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	276	29.0%	34.9%	18.2%	16.8%
Total	*953*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*953*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	2.6%	2.9%	2.1%	1.9%	6	3.9%	1.7%	7.4%	4.2%
Moderate	9	5.8%	3.1%	9.3%	7.2%	35	22.6%	14.0%	19.0%	13.1%
Middle	88	56.8%	40.9%	56.2%	48.7%	35	22.6%	17.6%	23.3%	20.1%
Upper	54	34.8%	53.1%	32.4%	42.1%	44	28.4%	48.3%	36.6%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	35	22.6%	18.3%	13.8%	15.1%
Total	*155*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*155*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	1.5%	0.2%	2.8%	1.1%	26	19.1%	12.0%	11.3%	6.8%
Moderate	17	12.5%	6.2%	12.3%	7.6%	41	30.1%	10.7%	26.0%	17.0%
Middle	91	66.9%	42.1%	61.9%	59.2%	35	25.7%	10.6%	27.4%	22.4%
Upper	26	19.1%	51.5%	23.0%	32.0%	30	22.1%	22.4%	33.7%	48.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	2.9%	44.2%	1.6%	5.0%
Total	*136*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*136*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	3	23.1%	38.4%	25.2%	20.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	21.5%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	61.5%	55.7%	39.3%	58.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	15.4%	5.8%	14.0%	11.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	100.0%	100.0%	100.0%	100.0%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	46	3.7%	18.3%	2.2%	2.9%	148	11.8%	2.9%	8.4%	4.0%
Moderate	179	14.2%	4.3%	10.0%	6.4%	376	29.9%	10.4%	22.3%	14.6%
Middle	744	59.2%	56.2%	56.4%	49.7%	198	15.8%	8.7%	22.0%	17.9%
Upper	288	22.9%	21.3%	31.4%	41.0%	207	16.5%	16.0%	32.1%	40.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	328	26.1%	62.0%	15.2%	22.8%
Total	*1,257*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1,257*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	111	12.2%	15.7%	7.9%	11.6%
Moderate	55	6.1%	6.4%	8.5%	7.8%
Middle	411	45.2%	44.9%	48.7%	49.0%
Upper	329	36.2%	32.6%	33.1%	30.9%
Unknown	3	0.3%	0.5%	0.2%	0.2%
Tract Unknown	0	0.0%	0.0%	1.7%	0.4%
Total	*909*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*333*	36.6%	16.9%	38.0%	28.7%
	By Loan Size				
$100,000 or less	415	45.7%	8.6%	91.8%	28.1%
$100,001-$250,000	207	22.8%	16.7%	3.9%	15.7%
$250,001-$1 Million	287	31.6%	74.7%	4.3%	56.2%
Total	*909*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Syracuse, NY (MSA 45060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	1.2%	0.8%	2.5%	1.3%	14	8.2%	3.6%	9.7%	5.4%
Moderate	18	10.6%	5.8%	9.7%	6.3%	59	34.7%	22.8%	24.2%	18.3%
Middle	79	46.5%	33.1%	47.5%	42.2%	39	22.9%	21.0%	22.9%	21.5%
Upper	71	41.8%	60.4%	40.1%	50.0%	45	26.5%	45.3%	35.2%	46.7%
Unknown	0	0.0%	0.0%	0.2%	0.2%	13	7.6%	7.4%	8.0%	8.2%
Total	*170*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*170*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	5	1.8%	0.8%	1.6%	1.0%	46	16.2%	10.1%	11.2%	7.5%
Moderate	7	2.5%	1.8%	9.7%	7.0%	57	20.1%	15.1%	20.1%	15.4%
Middle	116	40.8%	35.1%	45.8%	41.8%	62	21.8%	19.1%	24.4%	22.8%
Upper	156	54.9%	62.3%	42.9%	50.1%	118	41.5%	55.3%	38.7%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.4%	0.5%	5.6%	6.0%
Total	*284*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*284*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	0.7%	0.6%	1.5%	1.2%	14	9.8%	6.1%	8.6%	6.6%
Moderate	1	0.7%	0.1%	6.7%	4.1%	21	14.7%	9.6%	17.3%	12.4%
Middle	72	50.3%	45.8%	44.1%	37.4%	43	30.1%	22.1%	25.9%	22.4%
Upper	69	48.3%	53.5%	47.6%	57.2%	63	44.1%	61.9%	46.1%	56.2%
Unknown	0	0.0%	0.0%	0.1%	0.1%	2	1.4%	0.3%	2.0%	2.4%
Total	*143*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*143*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	25.0%	0.4%	26.8%	4.7%	0	0.0%	0.0%	2.4%	0.1%
Moderate	1	25.0%	2.8%	22.0%	5.3%	0	0.0%	0.0%	2.4%	0.1%
Middle	1	25.0%	22.6%	26.8%	34.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	25.0%	74.2%	19.5%	28.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	4.9%	26.9%	4	100.0%	100.0%	95.1%	99.9%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	9	1.5%	0.6%	2.2%	1.7%	74	12.3%	3.7%	9.9%	5.2%
Moderate	27	4.5%	3.0%	9.4%	6.2%	137	22.8%	9.3%	22.3%	15.4%
Middle	268	44.6%	29.6%	46.7%	41.1%	144	24.0%	10.8%	23.5%	19.3%
Upper	297	49.4%	66.8%	41.5%	47.8%	226	37.6%	27.8%	37.1%	42.0%
Unknown	0	0.0%	0.0%	0.1%	3.1%	20	3.3%	48.4%	7.1%	18.1%
Total	*601*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*601*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	46	8.0%	9.2%	7.7%	9.5%
Moderate	43	7.5%	10.8%	9.7%	10.1%
Middle	260	45.1%	48.0%	39.4%	40.2%
Upper	205	35.6%	25.9%	40.0%	36.7%
Unknown	22	3.8%	6.1%	2.1%	3.2%
Tract Unknown	0	0.0%	0.0%	1.1%	0.3%
Total	*576*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*342*	59.4%	27.6%	43.2%	30.1%
	By Loan Size				
$100,000 or less	391	67.9%	13.8%	91.9%	32.9%
$100,001-$250,000	77	13.4%	15.8%	4.3%	17.1%
$250,001-$1 Million	108	18.8%	70.4%	3.8%	49.9%
Total	*576*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Syracuse, NY (MSA 45060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	10	4.8%	2.2%	2.3%	1.8%	15	7.2%	3.6%	6.2%	2.7%
Moderate	22	10.6%	5.6%	10.4%	13.6%	41	19.8%	13.2%	20.6%	11.8%
Middle	92	44.4%	37.1%	46.2%	43.0%	37	17.9%	15.4%	22.3%	16.1%
Upper	83	40.1%	55.1%	41.0%	41.5%	84	40.6%	55.7%	34.9%	37.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%	30	14.5%	12.0%	16.0%	31.5%
Total	*207*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*207*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	1.2%	0.5%	2.1%	12.2%	6	7.1%	4.0%	7.2%	1.9%
Moderate	6	7.1%	4.5%	10.1%	24.0%	15	17.9%	12.3%	18.3%	5.6%
Middle	34	40.5%	32.1%	46.3%	38.6%	21	25.0%	21.8%	24.4%	8.8%
Upper	43	51.2%	62.9%	41.4%	25.1%	32	38.1%	53.4%	37.7%	20.4%
Unknown	0	0.0%	0.0%	0.1%	0.0%	10	11.9%	8.5%	12.4%	63.3%
Total	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	3	2.5%	1.1%	4.1%	3.5%	19	15.6%	3.3%	12.0%	4.2%
Moderate	12	9.8%	7.3%	10.8%	6.3%	36	29.5%	16.2%	22.1%	11.5%
Middle	67	54.9%	64.8%	49.2%	39.9%	31	25.4%	16.8%	26.4%	19.8%
Upper	40	32.8%	26.9%	35.6%	50.1%	33	27.0%	59.6%	37.4%	58.9%
Unknown	0	0.0%	0.0%	0.3%	0.1%	3	2.5%	4.2%	2.2%	5.6%
Total	*122*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*122*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.5%	39.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	21.1%	1.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	28.9%	8.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	36.8%	46.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	2.6%	3.5%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	14	3.4%	1.7%	2.5%	8.0%	40	9.6%	3.6%	7.1%	2.3%
Moderate	42	10.1%	7.2%	10.4%	15.4%	92	22.2%	12.9%	20.3%	9.0%
Middle	193	46.5%	36.9%	46.5%	38.8%	89	21.4%	16.7%	23.2%	12.7%
Upper	166	40.0%	54.3%	40.4%	37.5%	149	35.9%	54.4%	35.7%	30.2%
Unknown	0	0.0%	0.0%	0.1%	0.4%	45	10.8%	12.3%	13.7%	45.8%
Total	*415*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*415*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	35	8.5%	10.4%	6.8%	8.6%
Moderate	40	9.7%	8.6%	10.3%	9.6%
Middle	189	46.0%	51.4%	40.4%	43.4%
Upper	136	33.1%	25.2%	39.5%	34.6%
Unknown	11	2.7%	4.5%	2.0%	3.6%
Tract Unknown	0	0.0%	0.0%	1.1%	0.2%
Total	*411*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*202*	49.1%	24.5%	46.4%	28.8%
	By Loan Size				
$100,000 or less	209	50.9%	9.4%	90.9%	29.2%
$100,001-$250,000	80	19.5%	15.4%	4.3%	15.4%
$250,001-$1 Million	122	29.7%	75.2%	4.9%	55.4%
Total	*411*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Syracuse, NY (MSA 45060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	11	3.2%	2.0%	2.0%	1.2%	42	12.1%	6.6%	8.2%	4.5%
Moderate	48	13.8%	9.1%	12.1%	7.4%	74	21.3%	18.0%	21.5%	15.9%
Middle	139	40.1%	39.1%	40.2%	36.8%	85	24.5%	25.8%	22.8%	21.5%
Upper	149	42.9%	49.8%	45.6%	54.6%	89	25.6%	37.1%	31.7%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	57	16.4%	12.5%	15.8%	13.7%
Total	*347*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*347*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	2.3%	1.4%	1.7%	1.4%	9	5.1%	2.2%	6.9%	3.6%
Moderate	15	8.6%	4.6%	9.2%	5.6%	22	12.6%	8.4%	17.5%	11.6%
Middle	53	30.3%	24.2%	42.5%	38.1%	30	17.1%	14.1%	22.5%	19.3%
Upper	103	58.9%	69.8%	46.7%	54.9%	61	34.9%	55.3%	37.9%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	53	30.3%	19.9%	15.2%	15.5%
Total	*175*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*175*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.2%	0.3%	4.4%	1.9%	17	19.8%	9.2%	13.4%	5.5%
Moderate	13	15.1%	9.2%	12.2%	7.2%	25	29.1%	15.4%	23.6%	12.2%
Middle	43	50.0%	45.7%	47.6%	39.6%	27	31.4%	23.2%	26.7%	19.5%
Upper	28	32.6%	44.4%	35.6%	51.3%	15	17.4%	50.5%	34.4%	59.2%
Unknown	1	1.2%	0.3%	0.2%	0.0%	2	2.3%	1.7%	1.9%	3.6%
Total	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	9	29.0%	34.9%	25.6%	31.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	25.8%	12.1%	27.9%	12.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	9	29.0%	36.1%	25.6%	23.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	5	16.1%	16.9%	20.9%	33.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	31	100.0%	100.0%	100.0%	100.0%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	25	3.9%	22.4%	2.4%	4.8%	68	10.6%	1.9%	8.4%	3.8%
Moderate	84	13.1%	10.4%	11.5%	7.6%	121	18.9%	5.5%	20.6%	13.0%
Middle	244	38.2%	35.3%	41.5%	35.5%	142	22.2%	8.2%	23.0%	18.4%
Upper	285	44.6%	31.9%	44.5%	52.1%	165	25.8%	16.5%	33.3%	40.7%
Unknown	1	0.2%	0.0%	0.0%	0.0%	143	22.4%	68.0%	14.6%	24.1%
Total	*639*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*639*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	54	10.4%	10.7%	13.0%	14.1%
Moderate	71	13.7%	20.7%	10.6%	13.3%
Middle	225	43.3%	38.4%	42.6%	42.8%
Upper	170	32.7%	30.2%	33.9%	29.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*520*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*296*	56.9%	28.6%	42.8%	30.8%
	By Loan Size				
$100,000 or less	291	56.0%	10.4%	91.7%	31.3%
$100,001-$250,000	93	17.9%	16.4%	3.8%	15.3%
$250,001-$1 Million	136	26.2%	73.1%	4.5%	53.4%
Total	*520*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Syracuse, NY (MSA 45060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	7	2.0%	1.2%	2.5%	1.4%	30	8.6%	4.7%	9.0%	5.0%
Moderate	42	12.0%	7.8%	11.9%	7.1%	89	25.4%	20.2%	21.9%	16.2%
Middle	141	40.3%	38.0%	39.8%	36.4%	84	24.0%	23.7%	22.1%	21.2%
Upper	160	45.7%	53.0%	45.8%	55.1%	104	29.7%	41.8%	30.0%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	12.3%	9.5%	17.1%	15.5%
Total	*350*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*350*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	0.7%	0.2%	2.2%	1.2%	9	6.4%	3.0%	7.5%	4.1%
Moderate	11	7.9%	4.4%	8.6%	5.5%	20	14.3%	8.2%	16.3%	11.0%
Middle	43	30.7%	22.4%	43.4%	38.6%	23	16.4%	14.0%	23.7%	19.7%
Upper	85	60.7%	73.0%	45.8%	54.8%	48	34.3%	48.2%	35.7%	46.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	28.6%	26.6%	16.8%	18.6%
Total	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	4.3%	1.1%	2.8%	1.0%	12	13.0%	4.8%	12.6%	4.7%
Moderate	13	14.1%	12.9%	13.3%	6.8%	28	30.4%	13.4%	21.5%	12.3%
Middle	53	57.6%	52.5%	47.7%	45.4%	27	29.3%	36.8%	25.7%	23.2%
Upper	22	23.9%	33.5%	36.2%	46.8%	21	22.8%	28.5%	37.4%	55.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	4.3%	16.4%	2.9%	4.0%
Total	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	10.0%	12.6%	19.6%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	20.0%	5.2%	17.6%	8.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	50.0%	81.7%	37.3%	59.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	20.0%	0.5%	25.5%	21.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	100.0%	100.0%	100.0%	100.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	13	2.2%	6.6%	2.5%	2.4%	51	8.6%	2.1%	9.0%	4.2%
Moderate	68	11.5%	6.0%	11.2%	6.9%	137	23.1%	8.3%	20.3%	13.1%
Middle	242	40.9%	57.1%	41.7%	39.6%	134	22.6%	10.7%	22.8%	18.6%
Upper	269	45.4%	30.3%	44.5%	51.1%	173	29.2%	22.2%	32.3%	39.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	97	16.4%	56.6%	15.6%	25.0%
Total	*592*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*592*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	58	12.2%	13.2%	12.1%	15.7%
Moderate	77	16.1%	20.2%	10.3%	12.8%
Middle	203	42.6%	35.2%	41.7%	41.4%
Upper	139	29.1%	31.5%	34.1%	29.6%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	1.8%	0.5%
Total	*477*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*236*	49.5%	27.5%	43.8%	29.7%
	By Loan Size				
$100,000 or less	241	50.5%	11.2%	92.2%	30.7%
$100,001-$250,000	104	21.8%	18.3%	3.5%	14.5%
$250,001-$1 Million	132	27.7%	70.4%	4.3%	54.8%
Total	*477*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Syracuse, NY (MSA 45060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	14	3.8%	2.6%	2.6%	1.5%	18	4.9%	2.7%	8.4%	4.6%
Moderate	45	12.2%	7.8%	12.1%	7.6%	69	18.7%	13.8%	22.9%	17.0%
Middle	146	39.6%	34.8%	41.4%	37.6%	53	14.4%	13.1%	22.7%	21.5%
Upper	164	44.4%	54.8%	43.8%	53.3%	68	18.4%	26.8%	31.3%	44.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	161	43.6%	43.6%	14.7%	12.4%
Total	*369*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*369*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.2%	1.1%	4	4.0%	2.6%	7.9%	4.1%
Moderate	10	10.0%	6.0%	10.7%	7.2%	17	17.0%	12.3%	18.6%	13.4%
Middle	39	39.0%	32.5%	43.8%	39.2%	23	23.0%	23.3%	23.7%	20.6%
Upper	51	51.0%	61.6%	43.3%	52.4%	26	26.0%	36.2%	34.5%	45.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	30	30.0%	25.6%	15.2%	16.2%
Total	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	3.7%	0.8%	3.3%	1.7%	12	11.1%	2.0%	11.8%	5.6%
Moderate	17	15.7%	59.7%	13.2%	11.0%	34	31.5%	6.6%	23.6%	15.0%
Middle	46	42.6%	14.1%	45.7%	43.7%	28	25.9%	7.9%	26.7%	21.7%
Upper	41	38.0%	25.4%	37.8%	43.6%	29	26.9%	12.0%	34.5%	50.4%
Unknown	0	0.0%	0.0%	0.1%	0.0%	5	4.6%	71.5%	3.3%	7.4%
Total	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	9.1%	5.6%	18.2%	3.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.4%	23.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	72.7%	72.5%	56.8%	59.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	18.2%	22.0%	13.6%	13.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	100.0%	100.0%	100.0%	100.0%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	19	3.2%	2.9%	2.7%	1.6%	34	5.8%	2.0%	8.7%	4.1%
Moderate	72	12.2%	7.7%	11.9%	8.9%	120	20.4%	9.9%	21.9%	14.7%
Middle	239	40.6%	42.8%	42.7%	39.9%	104	17.7%	11.2%	23.4%	19.6%
Upper	258	43.9%	46.7%	42.7%	49.6%	123	20.9%	21.1%	32.4%	41.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	207	35.2%	55.7%	13.6%	20.1%
Total	*588*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*588*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	52	11.2%	12.6%	12.1%	15.0%
Moderate	77	16.6%	17.1%	10.6%	12.9%
Middle	181	39.1%	38.4%	40.4%	41.1%
Upper	153	33.0%	31.8%	34.6%	30.5%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	2.1%	0.5%
Total	*463*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*222*	47.9%	31.1%	38.0%	29.8%
	By Loan Size				
$100,000 or less	209	45.1%	8.3%	91.6%	26.5%
$100,001-$250,000	101	21.8%	16.7%	3.7%	14.7%
$250,001-$1 Million	153	33.0%	75.0%	4.7%	58.8%
Total	*463*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Albany-Schenectady-Troy, NY (MSA 10580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	21	10.8%	4.9%	3.2%	1.9%	38	19.5%	8.5%	9.2%	5.1%
Moderate	35	17.9%	9.6%	13.9%	9.2%	73	37.4%	26.3%	25.9%	19.9%
Middle	102	52.3%	57.8%	55.3%	55.0%	35	17.9%	18.4%	26.7%	26.3%
Upper	37	19.0%	27.6%	27.6%	33.9%	39	20.0%	37.7%	31.3%	41.8%
Unknown	0	0.0%	0.0%	0.1%	0.0%	10	5.1%	9.0%	6.9%	6.9%
Total	*195*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*195*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	3.5%	2.6%	2.2%	1.4%	11	12.9%	6.0%	10.3%	6.2%
Moderate	5	5.9%	3.9%	10.3%	7.5%	15	17.6%	12.7%	20.8%	17.1%
Middle	45	52.9%	46.3%	56.6%	54.3%	18	21.2%	20.8%	25.2%	24.5%
Upper	32	37.6%	47.2%	30.8%	36.8%	40	47.1%	60.0%	36.6%	43.5%
Unknown	0	0.0%	0.0%	0.1%	0.0%	1	1.2%	0.6%	7.1%	8.7%
Total	*85*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*85*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	2.7%	0.5%	1.9%	1.5%	4	10.8%	6.4%	8.1%	6.0%
Moderate	4	10.8%	8.7%	7.3%	6.1%	8	21.6%	19.9%	18.7%	15.9%
Middle	20	54.1%	61.4%	56.3%	55.4%	10	27.0%	34.9%	26.8%	25.2%
Upper	12	32.4%	29.4%	34.6%	37.0%	15	40.5%	38.8%	45.1%	50.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.3%	2.3%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	14.7%	11.4%	0	0.0%	0.0%	0.7%	0.0%
Moderate	3	42.9%	17.0%	24.5%	10.9%	0	0.0%	0.0%	1.4%	0.0%
Middle	3	42.9%	64.4%	49.7%	53.4%	0	0.0%	0.0%	1.4%	0.1%
Upper	1	14.3%	18.5%	11.2%	24.3%	0	0.0%	0.0%	4.9%	0.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	100.0%	100.0%	91.6%	99.3%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	25	7.7%	1.7%	2.9%	2.8%	53	16.4%	3.1%	9.3%	4.8%
Moderate	47	14.5%	13.4%	12.2%	8.9%	96	29.6%	9.1%	23.6%	17.2%
Middle	170	52.5%	60.5%	55.7%	54.7%	63	19.4%	8.0%	26.2%	23.2%
Upper	82	25.3%	24.4%	29.1%	33.6%	94	29.0%	17.8%	34.1%	38.2%
Unknown	0	0.0%	0.0%	0.1%	0.0%	18	5.6%	61.9%	6.8%	16.5%
Total	*324*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*324*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	31	13.5%	8.9%	9.0%	10.5%
Moderate	18	7.9%	3.5%	10.7%	11.8%
Middle	111	48.5%	49.6%	47.7%	44.6%
Upper	69	30.1%	38.0%	31.2%	32.4%
Unknown	0	0.0%	0.0%	0.3%	0.2%
Tract Unknown	0	0.0%	0.0%	1.1%	0.4%
Total	*229*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*111*	48.5%	22.1%	43.8%	27.3%
	By Loan Size				
$100,000 or less	115	50.2%	7.1%	93.3%	34.0%
$100,001-$250,000	34	14.8%	10.1%	3.1%	13.9%
$250,001-$1 Million	80	34.9%	82.8%	3.5%	52.0%
Total	*229*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Albany-Schenectady-Troy, NY (MSA 10580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	20	8.4%	5.4%	2.8%	1.4%	28	11.8%	5.7%	7.9%	4.2%
Moderate	46	19.4%	10.3%	14.3%	9.2%	83	35.0%	23.9%	23.8%	18.3%
Middle	114	48.1%	44.2%	54.8%	54.3%	53	22.4%	20.8%	24.8%	24.3%
Upper	57	24.1%	40.1%	28.1%	35.0%	41	17.3%	29.8%	31.7%	43.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	13.5%	19.8%	11.8%	10.2%
Total	*237*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*237*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.7%	1.4%	2	4.3%	0.8%	7.7%	4.3%
Moderate	4	8.5%	1.7%	12.2%	8.3%	8	17.0%	3.2%	19.0%	14.3%
Middle	23	48.9%	11.4%	57.4%	55.5%	9	19.1%	5.0%	24.2%	23.0%
Upper	20	42.6%	86.9%	27.6%	34.7%	10	21.3%	6.6%	33.0%	40.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	38.3%	84.5%	16.2%	17.7%
Total	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	4.2%	0.2%	2.0%	1.0%	5	20.8%	1.0%	7.5%	3.2%
Moderate	4	16.7%	9.4%	10.2%	7.3%	7	29.2%	14.8%	17.3%	13.0%
Middle	10	41.7%	5.8%	59.6%	60.4%	4	16.7%	1.2%	26.7%	22.5%
Upper	9	37.5%	84.7%	28.2%	31.2%	4	16.7%	5.3%	44.9%	55.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	4	16.7%	77.7%	3.7%	6.0%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	16.7%	5.3%	20.3%	17.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	33.3%	2.7%	30.8%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	25.0%	6.4%	36.8%	41.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	25.0%	85.6%	9.8%	30.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	2.3%	1.1%	12	100.0%	100.0%	100.0%	100.0%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	23	7.2%	4.4%	2.8%	3.4%	35	10.9%	1.4%	7.8%	3.7%
Moderate	58	18.1%	4.3%	13.6%	9.0%	98	30.6%	6.1%	22.0%	15.1%
Middle	150	46.9%	15.5%	55.6%	53.1%	66	20.6%	5.4%	24.6%	21.0%
Upper	89	27.8%	75.8%	27.9%	34.3%	55	17.2%	7.7%	32.7%	37.6%
Unknown	0	0.0%	0.0%	0.0%	0.2%	66	20.6%	79.5%	12.9%	22.7%
Total	*320*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*320*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	18	8.1%	4.0%	8.7%	10.6%
Moderate	18	8.1%	5.9%	11.2%	10.1%
Middle	93	42.1%	43.2%	47.8%	44.5%
Upper	92	41.6%	46.9%	31.1%	34.0%
Unknown	0	0.0%	0.0%	0.3%	0.4%
Tract Unknown	0	0.0%	0.0%	1.0%	0.3%
Total	*221*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*85*	38.5%	21.0%	48.9%	33.6%
	By Loan Size				
$100,000 or less	74	33.5%	5.4%	92.2%	29.2%
$100,001-$250,000	45	20.4%	10.1%	3.5%	13.7%
$250,001-$1 Million	102	46.2%	84.5%	4.3%	57.1%
Total	*221*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Albany-Schenectady-Troy, NY (MSA 10580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	12	4.8%	1.6%	3.5%	1.9%	29	11.6%	4.2%	8.6%	4.5%
Moderate	31	12.4%	5.2%	9.2%	6.1%	74	29.7%	14.2%	23.6%	17.9%
Middle	130	52.2%	65.6%	57.2%	56.3%	45	18.1%	12.0%	23.7%	23.0%
Upper	76	30.5%	27.6%	30.0%	35.7%	53	21.3%	23.0%	30.5%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	48	19.3%	46.5%	13.4%	13.4%
Total	*249*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*249*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	2.2%	2.0%	2.5%	1.5%	5	5.4%	8.0%	5.3%	3.0%
Moderate	10	10.9%	8.9%	7.8%	5.6%	11	12.0%	10.8%	16.3%	12.0%
Middle	52	56.5%	56.1%	56.9%	55.5%	17	18.5%	19.6%	23.3%	21.6%
Upper	28	30.4%	33.0%	32.8%	37.3%	11	12.0%	21.2%	34.3%	42.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	48	52.2%	40.3%	20.7%	20.8%
Total	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	9.5%	0.7%	2.7%	1.5%	1	4.8%	0.3%	7.6%	3.1%
Moderate	1	4.8%	0.8%	9.0%	6.1%	3	14.3%	1.5%	17.2%	12.8%
Middle	12	57.1%	57.6%	56.3%	53.6%	7	33.3%	35.0%	27.4%	24.3%
Upper	6	28.6%	40.8%	32.0%	38.8%	6	28.6%	37.7%	45.1%	57.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	19.0%	25.5%	2.8%	2.6%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	10.5%	3.1%	21.7%	7.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	21.1%	7.0%	25.6%	11.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	9	47.4%	80.5%	38.8%	56.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	21.1%	9.4%	14.0%	24.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	100.0%	100.0%	100.0%	100.0%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	18	4.7%	2.6%	3.3%	2.3%	35	9.2%	1.5%	7.4%	3.6%
Moderate	46	12.1%	6.5%	8.9%	6.4%	88	23.1%	4.3%	20.7%	14.5%
Middle	203	53.3%	75.1%	56.9%	56.1%	69	18.1%	4.5%	23.7%	20.6%
Upper	114	29.9%	15.7%	31.0%	35.2%	70	18.4%	7.5%	32.6%	38.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	119	31.2%	82.1%	15.5%	22.9%
Total	*381*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*381*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	30	11.5%	11.1%	7.1%	9.7%
Moderate	33	12.7%	12.1%	12.3%	12.4%
Middle	125	48.1%	49.6%	50.8%	51.3%
Upper	72	27.7%	27.1%	29.8%	26.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*260*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*119*	45.8%	26.6%	46.5%	30.5%
	By Loan Size				
$100,000 or less	103	39.6%	5.4%	92.8%	31.5%
$100,001-$250,000	49	18.8%	11.7%	3.3%	14.0%
$250,001-$1 Million	108	41.5%	82.9%	3.9%	54.5%
Total	*260*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Albany-Schenectady-Troy, NY (MSA 10580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	15	5.4%	1.8%	3.3%	1.8%	38	13.7%	4.0%	8.6%	4.6%
Moderate	42	15.2%	5.6%	8.7%	5.6%	96	34.7%	14.9%	24.5%	18.6%
Middle	143	51.6%	73.6%	56.0%	54.8%	53	19.1%	11.9%	24.0%	23.0%
Upper	77	27.8%	19.1%	32.1%	37.8%	51	18.4%	17.8%	29.1%	39.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	14.1%	51.5%	13.9%	14.6%
Total	*277*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*277*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	4.1%	2.7%	2.7%	1.7%	4	5.4%	4.4%	6.4%	3.5%
Moderate	5	6.8%	5.7%	8.6%	6.2%	18	24.3%	18.0%	17.6%	12.9%
Middle	47	63.5%	65.2%	57.1%	56.0%	13	17.6%	16.8%	22.5%	20.9%
Upper	19	25.7%	26.3%	31.6%	36.0%	15	20.3%	32.3%	31.9%	40.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	32.4%	28.4%	21.6%	22.6%
Total	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	3.1%	2.4%	1	5.3%	0.2%	9.1%	4.1%
Moderate	0	0.0%	0.0%	8.4%	11.0%	7	36.8%	19.8%	20.4%	14.4%
Middle	15	78.9%	83.4%	62.1%	56.4%	1	5.3%	6.8%	24.2%	22.1%
Upper	4	21.1%	16.6%	26.4%	30.2%	8	42.1%	59.9%	40.9%	48.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	13.4%	5.4%	10.9%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	6	25.0%	30.6%	18.8%	14.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	16.7%	6.2%	18.8%	7.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	11	45.8%	38.5%	45.1%	51.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	12.5%	24.6%	17.4%	25.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	100.0%	100.0%	100.0%	100.0%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	24	6.1%	21.5%	3.2%	3.5%	43	10.9%	1.2%	7.8%	3.7%
Moderate	51	12.9%	6.0%	8.7%	6.2%	121	30.7%	4.9%	21.7%	14.5%
Middle	216	54.8%	49.3%	56.7%	54.8%	67	17.0%	3.9%	23.4%	19.3%
Upper	103	26.1%	23.2%	31.4%	35.5%	74	18.8%	6.5%	30.6%	34.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	89	22.6%	83.4%	16.5%	28.2%
Total	*394*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*394*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	16	7.0%	5.9%	7.3%	8.1%
Moderate	32	14.1%	13.5%	12.2%	13.0%
Middle	119	52.4%	57.4%	50.3%	50.7%
Upper	60	26.4%	23.2%	29.0%	27.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.5%
Total	*227*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*97*	42.7%	24.8%	46.6%	33.2%
	By Loan Size				
$100,000 or less	88	38.8%	6.7%	92.3%	30.8%
$100,001-$250,000	42	18.5%	10.5%	3.4%	13.4%
$250,001-$1 Million	97	42.7%	82.8%	4.3%	55.7%
Total	*227*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Albany-Schenectady-Troy, NY (MSA 10580)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	10	2.8%	1.1%	3.4%	5.1%	35	9.8%	4.4%	7.7%	3.9%
Moderate	52	14.6%	8.6%	9.5%	6.3%	107	30.1%	21.9%	22.8%	16.8%
Middle	183	51.4%	52.1%	56.1%	52.5%	77	21.6%	22.2%	23.9%	22.1%
Upper	111	31.2%	38.2%	31.0%	36.1%	82	23.0%	34.2%	32.9%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	55	15.4%	17.2%	12.8%	14.7%
Total	*356*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*356*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	5.0%	2.8%	2.9%	1.7%	5	6.3%	3.8%	6.5%	4.0%
Moderate	11	13.8%	8.6%	8.8%	6.8%	10	12.5%	8.6%	17.5%	13.3%
Middle	45	56.3%	45.6%	58.7%	56.3%	14	17.5%	14.3%	23.9%	22.2%
Upper	20	25.0%	43.0%	29.6%	35.2%	22	27.5%	45.4%	34.4%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	36.3%	27.9%	17.6%	18.3%
Total	*80*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*80*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	12.5%	30.4%	2.6%	1.8%	3	18.8%	2.0%	7.9%	3.6%
Moderate	3	18.8%	33.4%	6.3%	6.4%	3	18.8%	20.0%	18.3%	15.4%
Middle	9	56.3%	34.1%	59.1%	57.5%	4	25.0%	27.7%	23.0%	20.6%
Upper	2	12.5%	2.1%	32.1%	34.3%	3	18.8%	6.1%	38.8%	51.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	44.2%	12.0%	9.3%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	4	16.7%	9.8%	24.6%	17.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	16.7%	4.7%	23.0%	13.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	33.3%	40.6%	34.9%	39.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	8	33.3%	44.9%	17.5%	30.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	100.0%	100.0%	100.0%	100.0%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	20	4.2%	7.6%	3.3%	5.7%	43	9.0%	1.1%	7.3%	3.5%
Moderate	70	14.7%	5.8%	9.1%	7.3%	120	25.2%	5.3%	20.6%	13.8%
Middle	245	51.5%	43.3%	57.0%	52.0%	95	20.0%	5.6%	23.7%	19.3%
Upper	141	29.6%	43.2%	30.6%	35.1%	107	22.5%	9.7%	33.6%	37.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	111	23.3%	78.2%	14.9%	26.2%
Total	*476*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*476*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	14	5.1%	4.9%	6.8%	8.0%
Moderate	39	14.3%	12.3%	11.9%	12.9%
Middle	148	54.4%	60.0%	50.9%	53.9%
Upper	71	26.1%	22.9%	28.7%	24.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.7%	0.6%
Total	*272*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*97*	35.7%	16.3%	39.3%	27.1%
	By Loan Size				
$100,000 or less	114	41.9%	7.7%	92.7%	28.5%
$100,001-$250,000	55	20.2%	13.5%	3.2%	14.0%
$250,001-$1 Million	103	37.9%	78.9%	4.1%	57.6%
Total	*272*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Binghamton, NY (MSA 13780)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	9	5.2%	2.3%	2.6%	1.3%	25	14.5%	10.1%	9.4%	5.6%
Moderate	19	11.0%	6.9%	9.6%	6.7%	65	37.6%	25.1%	26.8%	20.9%
Middle	101	58.4%	56.4%	56.4%	55.0%	45	26.0%	29.2%	26.0%	25.0%
Upper	44	25.4%	34.5%	31.4%	37.1%	34	19.7%	33.6%	30.8%	41.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	2.3%	1.9%	7.0%	7.0%
Total	*173*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*173*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	6	3.4%	2.2%	1.8%	1.2%	23	12.9%	7.9%	10.9%	6.6%
Moderate	12	6.7%	4.4%	7.5%	5.9%	34	19.1%	16.7%	19.8%	15.3%
Middle	91	51.1%	49.2%	56.9%	54.2%	47	26.4%	22.1%	26.0%	23.8%
Upper	69	38.8%	44.2%	33.7%	38.7%	70	39.3%	50.1%	38.5%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	2.2%	3.3%	4.8%	5.6%
Total	*178*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*178*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.5%	1.5%	1.6%	1.0%	9	13.8%	12.3%	10.3%	8.3%
Moderate	6	9.2%	4.0%	8.7%	7.0%	17	26.2%	21.1%	17.5%	15.1%
Middle	41	63.1%	57.9%	57.5%	56.4%	12	18.5%	26.5%	25.3%	25.7%
Upper	17	26.2%	36.7%	32.2%	35.5%	26	40.0%	39.6%	45.3%	49.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.5%	0.5%	1.6%	1.5%
Total	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	25.6%	8.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	25.9%	23.1%	8.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	74.1%	43.6%	80.5%	0	0.0%	0.0%	2.6%	0.7%
Upper	0	0.0%	0.0%	7.7%	3.2%	0	0.0%	0.0%	2.6%	1.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	94.9%	98.3%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	16	3.8%	2.1%	2.5%	1.7%	57	13.6%	9.2%	9.8%	5.6%
Moderate	38	9.1%	5.8%	9.0%	6.6%	116	27.8%	20.8%	23.7%	17.8%
Middle	234	56.0%	53.5%	56.5%	56.7%	104	24.9%	25.5%	25.7%	23.0%
Upper	130	31.1%	38.5%	31.9%	35.0%	130	31.1%	41.0%	34.1%	40.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	2.6%	3.6%	6.6%	12.9%
Total	*418*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*418*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	16	7.3%	7.5%	8.7%	11.7%
Moderate	36	16.4%	22.5%	11.5%	17.0%
Middle	131	59.5%	62.1%	57.3%	57.9%
Upper	37	16.8%	8.0%	21.2%	12.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.5%
Total	*220*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*133*	60.5%	29.5%	42.5%	29.4%
	By Loan Size				
$100,000 or less	160	72.7%	16.0%	93.7%	37.1%
$100,001-$250,000	28	12.7%	17.4%	3.8%	19.4%
$250,001-$1 Million	32	14.5%	66.6%	2.6%	43.6%
Total	*220*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Binghamton, NY (MSA 13780)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	4	2.6%	2.3%	1.8%	1.3%	20	12.8%	8.2%	8.3%	4.8%
Moderate	23	14.7%	9.9%	9.9%	6.4%	53	34.0%	28.0%	21.6%	16.9%
Middle	80	51.3%	51.5%	57.2%	57.0%	38	24.4%	24.0%	23.4%	22.4%
Upper	49	31.4%	36.3%	31.1%	35.4%	26	16.7%	25.7%	31.4%	42.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	12.2%	14.1%	15.3%	13.2%
Total	*156*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*156*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.1%	1.3%	9	16.7%	9.5%	9.1%	5.1%
Moderate	5	9.3%	4.7%	9.1%	5.6%	11	20.4%	16.4%	20.0%	14.3%
Middle	32	59.3%	63.7%	55.8%	55.3%	12	22.2%	22.4%	22.3%	20.4%
Upper	17	31.5%	31.6%	33.1%	37.8%	17	31.5%	44.3%	35.0%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	9.3%	7.4%	13.6%	15.4%
Total	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	2.5%	2.3%	1.5%	0.7%	21	25.9%	17.6%	16.0%	6.9%
Moderate	13	16.0%	13.0%	8.8%	6.7%	29	35.8%	31.4%	26.0%	17.3%
Middle	31	38.3%	45.1%	59.3%	60.0%	17	21.0%	26.1%	24.0%	21.8%
Upper	35	43.2%	39.5%	30.3%	32.5%	14	17.3%	24.9%	30.5%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	9.5%
Total	*81*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*81*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	12.5%	10.8%	32.1%	30.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	3.6%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	50.0%	40.8%	46.4%	46.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	37.5%	48.4%	17.9%	21.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	100.0%	100.0%	100.0%	100.0%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	7	2.3%	2.5%	2.0%	2.0%	50	16.7%	8.1%	9.6%	4.8%
Moderate	41	13.7%	7.8%	9.5%	6.0%	93	31.1%	22.7%	21.7%	15.8%
Middle	147	49.2%	53.4%	57.1%	56.4%	67	22.4%	21.5%	23.1%	21.3%
Upper	104	34.8%	36.3%	31.4%	35.5%	57	19.1%	28.0%	31.9%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	10.7%	19.6%	13.7%	15.9%
Total	*299*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*299*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	14	9.0%	11.6%	8.2%	9.7%
Moderate	25	16.0%	23.9%	13.4%	16.4%
Middle	95	60.9%	60.2%	56.7%	59.4%
Upper	22	14.1%	4.3%	21.0%	14.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.7%	0.3%
Total	*156*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*87*	55.8%	29.2%	46.8%	31.9%
	By Loan Size				
$100,000 or less	94	60.3%	11.8%	93.1%	33.8%
$100,001-$250,000	25	16.0%	14.7%	3.9%	18.4%
$250,001-$1 Million	37	23.7%	73.5%	3.0%	47.7%
Total	*156*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Binghamton, NY (MSA 13780)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	11	5.5%	2.6%	2.0%	1.3%	22	11.1%	6.9%	7.7%	4.6%
Moderate	21	10.6%	7.0%	8.2%	5.5%	72	36.2%	30.7%	24.6%	19.5%
Middle	99	49.7%	53.0%	54.9%	52.2%	38	19.1%	21.0%	23.7%	23.2%
Upper	68	34.2%	37.4%	34.9%	41.0%	42	21.1%	27.1%	27.7%	37.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	12.6%	14.3%	16.2%	14.8%
Total	*199*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*199*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	1.4%	0.7%	1.6%	1.1%	2	2.7%	0.9%	6.4%	3.2%
Moderate	8	10.8%	19.4%	8.3%	6.1%	13	17.6%	14.2%	16.9%	12.5%
Middle	31	41.9%	39.8%	54.8%	54.2%	14	18.9%	13.0%	23.3%	20.0%
Upper	34	45.9%	40.1%	35.4%	38.5%	25	33.8%	41.1%	35.4%	41.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	27.0%	30.7%	18.1%	23.3%
Total	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	3	4.8%	2.1%	1.6%	6.7%	7	11.3%	4.7%	11.5%	4.8%
Moderate	8	12.9%	8.1%	8.4%	5.0%	16	25.8%	16.4%	23.6%	17.1%
Middle	30	48.4%	35.9%	64.0%	56.8%	18	29.0%	17.8%	27.5%	22.8%
Upper	21	33.9%	54.0%	26.1%	31.5%	20	32.3%	59.7%	34.8%	46.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.6%	1.4%	2.6%	8.9%
Total	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	4	40.0%	18.8%	26.9%	18.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	20.0%	48.2%	26.9%	26.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	30.8%	48.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	40.0%	33.0%	15.4%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	100.0%	100.0%	100.0%	100.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	19	5.5%	3.0%	2.0%	1.9%	31	9.0%	4.6%	7.9%	4.1%
Moderate	39	11.3%	13.3%	8.3%	6.1%	101	29.3%	23.5%	22.2%	16.8%
Middle	160	46.4%	45.4%	56.1%	53.0%	70	20.3%	17.2%	24.0%	21.8%
Upper	127	36.8%	38.3%	33.6%	39.1%	87	25.2%	30.5%	30.8%	38.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	56	16.2%	24.2%	15.2%	18.8%
Total	*345*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*345*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	29	12.1%	13.2%	8.7%	10.7%
Moderate	36	15.1%	18.3%	14.3%	17.4%
Middle	96	40.2%	35.2%	47.6%	41.8%
Upper	78	32.6%	33.3%	29.4%	30.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*239*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*128*	53.6%	22.8%	44.7%	28.8%
	By Loan Size				
$100,000 or less	139	58.2%	10.9%	91.7%	28.6%
$100,001-$250,000	40	16.7%	14.1%	4.4%	17.3%
$250,001-$1 Million	60	25.1%	75.0%	3.8%	54.1%
Total	*239*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Binghamton, NY (MSA 13780)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	1.6%	0.9%	2.5%	1.5%	30	16.3%	9.6%	11.8%	7.2%
Moderate	19	10.3%	5.4%	8.2%	5.2%	51	27.7%	22.2%	23.8%	19.3%
Middle	99	53.8%	51.2%	52.0%	48.8%	46	25.0%	28.9%	22.6%	23.4%
Upper	63	34.2%	42.4%	37.4%	44.5%	35	19.0%	28.8%	26.2%	36.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	12.0%	10.5%	15.6%	13.8%
Total	*184*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*184*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	1.7%	1.6%	1.4%	0.9%	7	12.1%	8.3%	8.0%	4.4%
Moderate	4	6.9%	5.1%	6.5%	4.8%	9	15.5%	13.4%	18.4%	13.1%
Middle	30	51.7%	54.5%	58.2%	56.3%	14	24.1%	19.1%	23.7%	20.7%
Upper	23	39.7%	38.9%	33.8%	38.0%	15	25.9%	33.1%	33.1%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	22.4%	26.1%	16.8%	18.4%
Total	*58*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*58*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	7	10.3%	43.9%	2.7%	5.7%	15	22.1%	9.3%	17.5%	6.9%
Moderate	7	10.3%	4.2%	7.3%	6.4%	14	20.6%	9.9%	20.5%	16.2%
Middle	36	52.9%	31.2%	64.2%	52.5%	19	27.9%	18.0%	28.2%	23.6%
Upper	18	26.5%	20.7%	25.8%	35.4%	18	26.5%	23.0%	29.9%	43.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.9%	39.8%	3.9%	9.7%
Total	*68*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*68*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.3%	11.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	37.9%	21.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	100.0%	100.0%	41.4%	43.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.3%	23.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	11	3.5%	2.3%	2.3%	1.8%	52	16.6%	8.5%	11.4%	6.1%
Moderate	30	9.6%	4.9%	7.8%	5.6%	74	23.6%	18.3%	21.5%	16.7%
Middle	168	53.7%	55.4%	55.6%	51.2%	79	25.2%	24.3%	23.6%	22.0%
Upper	104	33.2%	37.4%	34.4%	41.5%	68	21.7%	26.9%	28.6%	38.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	12.8%	22.0%	14.9%	17.2%
Total	*313*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*313*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	22	10.5%	13.4%	9.0%	14.2%
Moderate	54	25.8%	33.2%	15.9%	20.6%
Middle	71	34.0%	27.9%	44.9%	39.9%
Upper	62	29.7%	25.5%	28.9%	24.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.3%
Total	*209*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*103*	49.3%	28.5%	43.9%	31.2%
	By Loan Size				
$100,000 or less	111	53.1%	10.4%	92.1%	28.1%
$100,001-$250,000	35	16.7%	13.5%	3.5%	14.3%
$250,001-$1 Million	63	30.1%	76.1%	4.3%	57.7%
Total	*209*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Binghamton, NY (MSA 13780)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	6	2.8%	2.4%	2.3%	1.5%	26	12.0%	7.6%	9.6%	5.5%
Moderate	22	10.1%	6.5%	8.5%	5.9%	63	29.0%	23.5%	23.3%	18.5%
Middle	121	55.8%	51.8%	56.3%	51.9%	42	19.4%	18.8%	23.1%	21.5%
Upper	68	31.3%	39.3%	32.9%	40.8%	46	21.2%	31.8%	29.9%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	18.4%	18.3%	14.2%	13.3%
Total	*217*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*217*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	3.1%	1.0%	1.8%	1.1%	5	7.7%	3.4%	7.7%	4.6%
Moderate	6	9.2%	5.0%	8.8%	7.2%	16	24.6%	15.4%	19.6%	14.5%
Middle	37	56.9%	50.1%	57.7%	53.8%	15	23.1%	24.1%	26.7%	24.3%
Upper	20	30.8%	43.9%	31.6%	37.9%	21	32.3%	47.4%	35.4%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	12.3%	9.7%	10.5%	12.8%
Total	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.6%	0.0%	0.9%	0.4%	18	28.6%	1.6%	18.3%	5.5%
Moderate	10	15.9%	1.1%	8.9%	5.4%	15	23.8%	1.4%	23.7%	14.0%
Middle	37	58.7%	5.8%	63.1%	47.5%	14	22.2%	3.1%	22.5%	17.4%
Upper	15	23.8%	93.0%	27.1%	46.7%	14	22.2%	2.6%	32.1%	41.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.2%	91.3%	3.4%	21.6%
Total	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	20.0%	20.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	10.0%	0.2%	26.7%	6.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	9	90.0%	99.8%	53.3%	73.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	100.0%	100.0%	100.0%	100.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	9	2.5%	1.5%	2.1%	2.1%	49	13.8%	5.0%	10.4%	5.0%
Moderate	39	11.0%	4.7%	8.8%	6.2%	94	26.5%	16.0%	22.2%	16.3%
Middle	204	57.5%	51.6%	57.8%	53.0%	71	20.0%	15.3%	23.8%	21.1%
Upper	103	29.0%	42.2%	31.3%	38.7%	81	22.8%	26.8%	31.6%	40.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	60	16.9%	36.9%	12.0%	17.3%
Total	*355*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*355*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	26	10.6%	10.3%	8.6%	9.7%
Moderate	40	16.3%	21.8%	13.9%	16.8%
Middle	96	39.2%	33.5%	45.3%	41.7%
Upper	83	33.9%	34.5%	30.5%	31.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.8%	0.3%
Total	*245*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*112*	45.7%	23.1%	39.4%	29.8%
	By Loan Size				
$100,000 or less	123	50.2%	9.3%	90.4%	22.4%
$100,001-$250,000	52	21.2%	17.5%	4.3%	16.1%
$250,001-$1 Million	70	28.6%	73.2%	5.2%	61.5%
Total	*245*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Ithaca, NY (MSA 27060)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	5	22.7%	14.6%	7.3%	3.8%
Moderate	4	18.2%	19.3%	10.3%	8.4%	7	31.8%	26.5%	23.0%	16.3%
Middle	15	68.2%	58.7%	70.0%	64.4%	4	18.2%	18.4%	22.5%	20.3%
Upper	3	13.6%	22.0%	18.9%	25.9%	5	22.7%	36.5%	41.0%	52.8%
Unknown	0	0.0%	0.0%	0.9%	1.2%	1	4.5%	4.0%	6.2%	6.7%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.0%	7.7%
Moderate	3	11.5%	8.2%	12.6%	12.1%	14	53.8%	46.6%	26.3%	20.8%
Middle	13	50.0%	57.3%	69.8%	65.0%	2	7.7%	6.5%	25.4%	24.2%
Upper	10	38.5%	34.5%	17.3%	20.8%	10	38.5%	47.0%	31.0%	40.2%
Unknown	0	0.0%	0.0%	0.3%	2.1%	0	0.0%	0.0%	5.3%	7.1%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.2%	5.6%
Moderate	1	14.3%	24.8%	5.9%	6.0%	1	14.3%	24.8%	22.4%	23.0%
Middle	5	71.4%	70.3%	80.0%	74.4%	4	57.1%	15.8%	34.1%	24.2%
Upper	1	14.3%	5.0%	14.1%	19.6%	2	28.6%	59.5%	31.8%	38.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	8.9%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	21.7%	11.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	43.5%	27.9%	0	0.0%	0.0%	4.3%	0.5%
Upper	0	0.0%	0.0%	17.4%	39.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	17.4%	21.1%	0	0.0%	0.0%	95.7%	99.5%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	9.1%	6.5%	8.6%	3.7%
Moderate	8	14.5%	15.1%	10.8%	9.7%	22	40.0%	35.1%	23.4%	13.7%
Middle	33	60.0%	59.4%	70.1%	56.8%	10	18.2%	12.8%	23.7%	16.8%
Upper	14	25.5%	25.5%	18.1%	27.8%	17	30.9%	43.8%	36.9%	38.9%
Unknown	0	0.0%	0.0%	0.9%	5.4%	1	1.8%	1.8%	7.4%	27.0%
Total	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	13.1%	32.7%	15.8%	17.7%
Middle	23	37.7%	30.1%	48.2%	46.9%
Upper	27	44.3%	34.9%	30.3%	26.1%
Unknown	3	4.9%	2.3%	4.5%	9.1%
Tract Unknown	0	0.0%	0.0%	1.1%	0.2%
Total	*61*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*40*	65.6%	35.3%	46.6%	39.8%
	By Loan Size				
$100,000 or less	52	85.2%	26.2%	91.6%	32.2%
$100,001-$250,000	2	3.3%	8.1%	4.2%	18.3%
$250,001-$1 Million	7	11.5%	65.7%	4.2%	49.4%
Total	*61*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Ithaca, NY (MSA 27060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	3.3%	6.6%	2.9%
Moderate	3	16.7%	11.8%	9.1%	6.7%	1	5.6%	3.4%	18.0%	11.1%
Middle	11	61.1%	60.9%	69.5%	65.3%	5	27.8%	22.0%	23.7%	19.9%
Upper	4	22.2%	27.3%	21.2%	27.8%	7	38.9%	50.2%	42.2%	52.3%
Unknown	0	0.0%	0.0%	0.2%	0.2%	4	22.2%	21.2%	9.4%	13.8%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.2%	3.4%
Moderate	0	0.0%	0.0%	13.3%	10.0%	1	33.3%	17.4%	19.1%	11.9%
Middle	2	66.7%	27.5%	68.7%	57.8%	0	0.0%	0.0%	23.5%	17.4%
Upper	0	0.0%	0.0%	12.2%	13.6%	1	33.3%	72.5%	38.8%	48.2%
Unknown	1	33.3%	72.5%	5.8%	18.6%	1	33.3%	10.2%	11.3%	19.1%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	50.0%	16.9%	6.1%
Moderate	0	0.0%	0.0%	12.7%	19.6%	2	50.0%	50.0%	22.5%	9.0%
Middle	3	75.0%	66.7%	77.2%	64.5%	0	0.0%	0.0%	22.1%	23.4%
Upper	1	25.0%	33.3%	9.7%	15.5%	0	0.0%	0.0%	36.3%	58.0%
Unknown	0	0.0%	0.0%	0.4%	0.4%	0	0.0%	0.0%	2.2%	3.6%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	12.0%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	32.0%	22.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	24.0%	36.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	32.0%	31.3%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	11.5%	1.2%	8.5%	2.2%
Moderate	3	11.5%	3.9%	10.8%	8.5%	4	15.4%	2.2%	18.8%	7.7%
Middle	17	65.4%	82.8%	70.1%	50.6%	5	19.2%	7.3%	23.0%	13.4%
Upper	5	19.2%	9.1%	17.0%	27.8%	8	30.8%	20.8%	39.6%	35.5%
Unknown	1	3.8%	4.2%	2.1%	13.0%	6	23.1%	68.5%	10.1%	41.3%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	13.0%	38.7%	16.3%	16.7%
Middle	9	39.1%	27.3%	48.7%	40.4%
Upper	10	43.5%	32.2%	30.8%	35.3%
Unknown	1	4.3%	1.8%	3.3%	7.3%
Tract Unknown	0	0.0%	0.0%	0.9%	0.3%
Total	*23*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*15*	65.2%	44.6%	53.5%	48.7%
	By Loan Size				
$100,000 or less	17	73.9%	20.5%	91.8%	31.0%
$100,001-$250,000	2	8.7%	8.6%	3.7%	15.1%
$250,001-$1 Million	4	17.4%	70.9%	4.5%	53.9%
Total	*23*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Ithaca, NY (MSA 27060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.4%	0.6%	0	0.0%	0.0%	3.5%	1.4%
Moderate	1	5.9%	4.9%	11.0%	8.5%	4	23.5%	21.9%	16.4%	10.4%
Middle	10	58.8%	64.5%	62.7%	56.9%	6	35.3%	37.0%	22.3%	18.4%
Upper	6	35.3%	30.6%	25.4%	33.7%	4	23.5%	28.9%	50.1%	61.4%
Unknown	0	0.0%	0.0%	0.4%	0.3%	3	17.6%	12.2%	7.8%	8.5%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	1.6%
Moderate	1	10.0%	3.4%	16.4%	14.2%	0	0.0%	0.0%	15.7%	10.0%
Middle	5	50.0%	53.5%	64.4%	58.8%	1	10.0%	6.9%	26.8%	23.1%
Upper	4	40.0%	43.1%	18.9%	26.8%	3	30.0%	46.5%	45.5%	54.0%
Unknown	0	0.0%	0.0%	0.2%	0.2%	6	60.0%	46.7%	8.3%	11.3%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	71.4%	11.3%	3.8%
Moderate	1	33.3%	71.4%	15.0%	14.3%	0	0.0%	0.0%	24.5%	14.2%
Middle	1	33.3%	7.1%	66.1%	54.8%	1	33.3%	7.1%	24.5%	20.5%
Upper	1	33.3%	21.4%	18.2%	30.7%	1	33.3%	21.4%	36.9%	57.3%
Unknown	0	0.0%	0.0%	0.7%	0.2%	0	0.0%	0.0%	2.9%	4.2%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	2.5%	22.2%	5.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	44.4%	41.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	50.0%	97.5%	33.3%	53.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.2%	0.4%	1	2.9%	0.1%	4.8%	1.4%
Moderate	5	14.7%	3.3%	13.2%	9.8%	4	11.8%	4.3%	17.4%	9.3%
Middle	16	47.1%	20.8%	63.5%	55.6%	8	23.5%	8.3%	23.6%	17.6%
Upper	13	38.2%	75.9%	22.6%	34.0%	8	23.5%	12.8%	46.1%	52.9%
Unknown	0	0.0%	0.0%	0.4%	0.2%	13	38.2%	74.5%	8.1%	18.8%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.8%	0.3%
Moderate	13	35.1%	27.3%	23.1%	27.4%
Middle	20	54.1%	69.7%	49.3%	44.4%
Upper	4	10.8%	3.0%	26.7%	27.9%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*37*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*22*	59.5%	29.9%	49.8%	43.7%
	By Loan Size				
$100,000 or less	19	51.4%	8.1%	90.2%	25.8%
$100,001-$250,000	8	21.6%	19.0%	4.4%	15.3%
$250,001-$1 Million	10	27.0%	72.9%	5.4%	58.9%
Total	*37*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Ithaca, NY (MSA 27060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.2%	0.3%	1	5.6%	2.0%	9.1%	4.1%
Moderate	2	11.1%	6.7%	11.6%	8.9%	0	0.0%	0.0%	21.3%	14.8%
Middle	10	55.6%	45.8%	64.1%	56.1%	4	22.2%	19.5%	23.9%	22.0%
Upper	6	33.3%	47.5%	24.1%	34.7%	9	50.0%	58.0%	39.6%	50.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	22.2%	20.6%	6.0%	8.7%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.0%	2.8%
Moderate	0	0.0%	0.0%	13.5%	9.6%	2	22.2%	28.9%	18.8%	12.8%
Middle	7	77.8%	72.4%	62.3%	52.7%	0	0.0%	0.0%	24.8%	18.8%
Upper	2	22.2%	27.6%	24.2%	37.6%	5	55.6%	58.8%	43.9%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	12.3%	6.4%	13.1%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	2.5%	16.4%	5.8%
Moderate	0	0.0%	0.0%	16.7%	13.3%	0	0.0%	0.0%	21.2%	11.7%
Middle	3	100.0%	100.0%	67.2%	50.7%	1	33.3%	4.2%	25.7%	18.8%
Upper	0	0.0%	0.0%	16.1%	36.0%	1	33.3%	93.2%	35.7%	58.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.0%	5.4%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	33.3%	8.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	26.7%	9.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	40.0%	82.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.1%	0.1%	2	6.3%	1.0%	9.4%	2.4%
Moderate	4	12.5%	41.4%	13.5%	8.9%	2	6.3%	4.1%	20.2%	8.9%
Middle	20	62.5%	33.3%	63.5%	38.1%	5	15.6%	8.9%	24.1%	13.2%
Upper	8	25.0%	25.2%	22.9%	52.8%	15	46.9%	36.7%	39.3%	32.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	25.0%	49.4%	6.9%	42.9%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.4%	0.2%
Moderate	10	29.4%	24.3%	23.5%	25.8%
Middle	9	26.5%	35.9%	46.7%	40.9%
Upper	15	44.1%	39.8%	27.3%	32.8%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	2.1%	0.3%
Total	*34*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*24*	70.6%	32.6%	51.6%	52.5%
	By Loan Size				
$100,000 or less	20	58.8%	16.4%	89.6%	28.6%
$100,001-$250,000	9	26.5%	34.9%	5.5%	20.1%
$250,001-$1 Million	5	14.7%	48.7%	4.9%	51.3%
Total	*34*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Ithaca, NY (MSA 27060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.1%	0.2%	1	4.3%	2.9%	6.9%	3.5%
Moderate	1	4.3%	3.5%	11.6%	8.8%	6	26.1%	16.9%	23.5%	17.0%
Middle	17	73.9%	59.6%	63.8%	57.9%	3	13.0%	12.4%	26.4%	24.0%
Upper	5	21.7%	37.0%	24.3%	33.0%	6	26.1%	36.3%	37.8%	50.7%
Unknown	0	0.0%	0.0%	0.1%	0.1%	7	30.4%	31.5%	5.4%	4.8%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.3%	0.2%	0	0.0%	0.0%	12.3%	6.7%
Moderate	0	0.0%	0.0%	15.3%	10.0%	0	0.0%	0.0%	21.5%	13.5%
Middle	2	66.7%	58.6%	63.8%	58.6%	2	66.7%	58.6%	25.2%	19.5%
Upper	1	33.3%	41.4%	20.6%	31.2%	0	0.0%	0.0%	30.4%	33.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	41.4%	10.7%	26.5%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	45.5%	16.9%	7.7%
Moderate	1	20.0%	27.3%	17.3%	12.3%	0	0.0%	0.0%	21.1%	14.2%
Middle	3	60.0%	48.5%	68.1%	57.2%	1	20.0%	18.2%	28.1%	21.3%
Upper	1	20.0%	24.2%	14.7%	30.5%	2	40.0%	36.4%	31.3%	47.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.6%	9.2%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.3%	1.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	40.0%	2.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	36.7%	96.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.1%	0.1%	3	9.4%	1.2%	10.0%	2.5%
Moderate	2	6.3%	1.4%	13.8%	5.8%	6	18.8%	6.4%	22.1%	8.8%
Middle	22	68.8%	24.6%	64.2%	32.8%	6	18.8%	6.7%	26.0%	12.5%
Upper	8	25.0%	74.0%	21.8%	61.3%	8	25.0%	13.8%	34.2%	25.4%
Unknown	0	0.0%	0.0%	0.1%	0.0%	9	28.1%	71.9%	7.8%	50.8%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.3%	0.1%
Moderate	10	33.3%	33.4%	23.5%	22.1%
Middle	10	33.3%	29.4%	47.1%	45.9%
Upper	10	33.3%	37.2%	26.6%	31.5%
Unknown	0	0.0%	0.0%	0.3%	0.0%
Tract Unknown	0	0.0%	0.0%	2.2%	0.4%
Total	*30*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*21*	70.0%	53.3%	43.9%	41.8%
	By Loan Size				
$100,000 or less	18	60.0%	18.1%	89.6%	25.4%
$100,001-$250,000	5	16.7%	16.8%	4.7%	17.1%
$250,001-$1 Million	7	23.3%	65.0%	5.7%	57.5%
Total	*30*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Kingston, NY (MSA 28740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.1%	1.7%	3	4.7%	3.5%	4.1%	2.2%
Moderate	2	3.1%	3.1%	7.1%	4.5%	27	42.2%	33.1%	19.0%	13.0%
Middle	36	56.3%	55.3%	58.1%	57.0%	15	23.4%	26.1%	25.0%	21.7%
Upper	26	40.6%	41.5%	32.6%	36.8%	18	28.1%	35.4%	47.5%	58.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.6%	1.9%	4.4%	4.2%
Total	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.6%	1.4%	8	11.8%	11.0%	7.5%	4.0%
Moderate	0	0.0%	0.0%	5.0%	3.7%	9	13.2%	8.7%	18.8%	13.4%
Middle	44	64.7%	60.2%	58.8%	54.0%	23	33.8%	33.6%	26.6%	24.4%
Upper	24	35.3%	39.8%	34.6%	40.9%	25	36.8%	43.9%	40.3%	51.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	4.4%	2.7%	6.9%	6.7%
Total	*68*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*68*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.4%	1.3%	2	16.7%	11.5%	5.2%	3.7%
Moderate	2	16.7%	14.2%	5.6%	3.2%	1	8.3%	12.8%	17.1%	16.2%
Middle	6	50.0%	60.8%	53.8%	53.5%	5	41.7%	53.3%	26.6%	25.4%
Upper	4	33.3%	25.0%	39.2%	41.9%	4	33.3%	22.4%	48.6%	50.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	3.9%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	2.2%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.1%	6.9%	0	0.0%	0.0%	2.2%	0.2%
Middle	1	100.0%	100.0%	77.8%	87.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.9%	4.7%	0	0.0%	0.0%	11.1%	2.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	86.7%	97.6%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.9%	1.4%	13	9.0%	6.5%	5.2%	2.3%
Moderate	4	2.8%	2.2%	6.4%	4.6%	37	25.5%	21.0%	18.5%	11.4%
Middle	87	60.0%	60.2%	58.3%	60.7%	43	29.7%	28.5%	25.3%	19.3%
Upper	54	37.2%	37.6%	33.5%	33.3%	47	32.4%	35.9%	44.8%	48.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	3.4%	8.2%	6.1%	18.4%
Total	*145*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*145*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	0.7%	0.2%	1.5%	0.7%
Moderate	14	10.1%	30.6%	6.8%	10.4%
Middle	85	61.2%	54.9%	57.0%	59.8%
Upper	39	28.1%	14.3%	32.1%	28.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.7%	1.0%
Total	*139*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*102*	73.4%	29.1%	44.7%	33.9%
	By Loan Size				
$100,000 or less	112	80.6%	16.3%	95.6%	43.5%
$100,001-$250,000	13	9.4%	15.5%	2.3%	13.8%
$250,001-$1 Million	14	10.1%	68.2%	2.2%	42.7%
Total	*139*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Kingston, NY (MSA 28740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	4	8.3%	6.6%	2.2%	1.5%	3	6.3%	3.1%	3.9%	1.9%
Moderate	7	14.6%	9.3%	6.6%	4.4%	10	20.8%	15.6%	19.6%	14.2%
Middle	29	60.4%	59.7%	59.6%	56.0%	13	27.1%	24.5%	24.5%	21.1%
Upper	8	16.7%	24.3%	31.6%	38.1%	18	37.5%	50.2%	44.4%	55.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	8.3%	6.6%	7.6%	7.1%
Total	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.5%	1.0%	0	0.0%	0.0%	7.0%	4.2%
Moderate	0	0.0%	0.0%	6.3%	4.8%	0	0.0%	0.0%	17.0%	13.0%
Middle	11	73.3%	73.0%	58.9%	55.6%	4	26.7%	21.2%	27.7%	25.2%
Upper	4	26.7%	27.0%	33.3%	38.5%	7	46.7%	57.0%	35.7%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	26.7%	21.8%	12.6%	13.6%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.6%	1.9%	5	26.3%	10.2%	8.1%	3.3%
Moderate	5	26.3%	9.4%	4.9%	2.2%	6	31.6%	10.4%	18.1%	12.5%
Middle	8	42.1%	73.6%	62.1%	55.7%	4	21.1%	15.9%	27.8%	25.5%
Upper	6	31.6%	17.0%	31.4%	40.2%	4	21.1%	63.4%	42.4%	52.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.6%	6.4%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	3.4%	3.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	17.2%	10.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	72.4%	73.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.9%	12.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	4.8%	4.3%	2.0%	1.4%	8	9.5%	2.3%	5.1%	2.5%
Moderate	14	16.7%	9.7%	6.4%	4.5%	16	19.0%	10.5%	18.6%	13.6%
Middle	48	57.1%	62.0%	59.8%	56.2%	21	25.0%	22.5%	25.5%	21.9%
Upper	18	21.4%	24.1%	31.8%	37.9%	29	34.5%	50.9%	41.4%	51.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	11.9%	13.8%	9.4%	10.2%
Total	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	1.1%	0.1%	1.7%	0.5%
Moderate	11	11.7%	18.9%	7.0%	7.5%
Middle	45	47.9%	47.9%	55.0%	58.1%
Upper	37	39.4%	33.1%	34.2%	33.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.1%	0.8%
Total	*94*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*48*	51.1%	23.7%	48.8%	33.2%
	By Loan Size				
$100,000 or less	56	59.6%	9.6%	95.3%	41.8%
$100,001-$250,000	14	14.9%	12.6%	2.3%	14.2%
$250,001-$1 Million	24	25.5%	77.8%	2.4%	44.0%
Total	*94*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Kingston, NY (MSA 28740)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	4	7.1%	4.1%	4.7%	2.3%
Moderate	6	10.7%	7.2%	9.5%	6.8%	13	23.2%	13.9%	17.9%	12.6%
Middle	45	80.4%	82.4%	75.9%	75.9%	19	33.9%	25.8%	25.1%	22.0%
Upper	5	8.9%	10.3%	14.7%	17.3%	14	25.0%	31.1%	44.5%	55.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	10.7%	25.0%	7.7%	7.7%
Total	*56*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*56*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.9%	1.5%	6.9%	3.8%
Moderate	0	0.0%	0.0%	6.5%	4.9%	0	0.0%	0.0%	15.3%	11.9%
Middle	11	64.7%	56.2%	74.3%	71.0%	5	29.4%	28.4%	24.9%	22.8%
Upper	6	35.3%	43.8%	19.2%	24.2%	3	17.6%	35.3%	35.8%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	47.1%	34.7%	17.1%	17.6%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	32.3%	8.7%	3.2%
Moderate	0	0.0%	0.0%	9.0%	9.9%	1	20.0%	32.3%	15.6%	9.2%
Middle	4	80.0%	90.3%	78.5%	74.1%	1	20.0%	19.4%	23.6%	20.3%
Upper	1	20.0%	9.7%	12.5%	16.0%	1	20.0%	16.1%	47.2%	58.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.9%	8.3%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	16.7%	28.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	76.7%	67.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.7%	4.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	7	8.8%	3.1%	5.7%	2.7%
Moderate	6	7.5%	4.7%	8.6%	7.3%	14	17.5%	9.2%	16.7%	11.8%
Middle	62	77.5%	79.7%	75.6%	74.0%	25	31.3%	22.6%	24.7%	21.3%
Upper	12	15.0%	15.6%	15.8%	18.7%	18	22.5%	27.5%	41.6%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	20.0%	37.6%	11.3%	14.4%
Total	*80*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*80*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	16	13.7%	25.2%	11.1%	11.7%
Middle	82	70.1%	51.0%	70.7%	68.2%
Upper	19	16.2%	23.9%	18.2%	20.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*117*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*81*	69.2%	14.7%	48.9%	29.4%
	By Loan Size				
$100,000 or less	84	71.8%	12.7%	96.2%	45.5%
$100,001-$250,000	12	10.3%	11.6%	2.1%	13.7%
$250,001-$1 Million	21	17.9%	75.7%	1.7%	40.8%
Total	*117*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Kingston, NY (MSA 28740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	2.4%
Moderate	7	13.2%	10.1%	10.6%	7.2%	13	24.5%	15.6%	19.2%	12.9%
Middle	40	75.5%	76.4%	75.4%	75.8%	23	43.4%	45.9%	26.3%	22.8%
Upper	6	11.3%	13.5%	14.0%	17.0%	9	17.0%	21.9%	40.3%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	15.1%	16.6%	9.4%	9.4%
Total	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	2.2%
Moderate	0	0.0%	0.0%	8.6%	6.1%	3	21.4%	15.2%	16.5%	11.5%
Middle	10	71.4%	76.3%	73.6%	72.5%	2	14.3%	11.8%	21.6%	19.3%
Upper	4	28.6%	23.7%	17.9%	21.3%	5	35.7%	48.4%	39.9%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	28.6%	24.6%	17.3%	19.0%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.4%	5.2%
Moderate	1	12.5%	4.3%	9.3%	6.4%	1	12.5%	4.3%	21.3%	14.7%
Middle	7	87.5%	95.7%	80.4%	79.3%	3	37.5%	34.2%	24.4%	16.3%
Upper	0	0.0%	0.0%	10.3%	14.2%	4	50.0%	61.5%	37.1%	52.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	11.4%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	18.4%	27.3%	22.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	81.6%	68.2%	76.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.5%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.5%	2.2%
Moderate	10	12.7%	8.8%	9.9%	8.0%	17	21.5%	13.5%	18.4%	11.5%
Middle	59	74.7%	77.2%	75.3%	75.0%	28	35.4%	32.9%	24.4%	19.7%
Upper	10	12.7%	13.9%	14.8%	17.0%	18	22.8%	25.5%	39.5%	46.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	20.3%	28.2%	12.2%	19.6%
Total	*79*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*79*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	15	18.3%	33.7%	11.8%	16.6%
Middle	52	63.4%	46.4%	68.1%	66.4%
Upper	15	18.3%	19.8%	16.9%	15.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.2%	1.7%
Total	*82*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*33*	40.2%	14.5%	45.3%	25.9%
	By Loan Size				
$100,000 or less	40	48.8%	8.6%	96.5%	45.2%
$100,001-$250,000	12	14.6%	10.2%	1.4%	9.6%
$250,001-$1 Million	30	36.6%	81.3%	2.0%	45.2%
Total	*82*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Kingston, NY (MSA 28740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.2%	1.3%	2.9%	1.3%
Moderate	3	6.7%	6.2%	9.7%	7.7%	7	15.6%	8.6%	16.3%	10.9%
Middle	36	80.0%	80.8%	74.2%	72.5%	10	22.2%	16.6%	24.3%	21.3%
Upper	6	13.3%	13.0%	16.1%	19.8%	12	26.7%	38.6%	44.9%	55.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	33.3%	34.8%	11.6%	11.0%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.7%	3.6%
Moderate	4	22.2%	20.6%	8.4%	6.3%	3	16.7%	9.9%	14.6%	10.4%
Middle	14	77.8%	79.4%	75.5%	74.0%	5	27.8%	29.5%	23.0%	21.2%
Upper	0	0.0%	0.0%	16.1%	19.6%	6	33.3%	32.5%	39.8%	47.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	22.2%	28.1%	16.9%	17.4%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	4	33.3%	14.9%	9.3%	3.6%
Moderate	2	16.7%	8.0%	12.4%	6.4%	3	25.0%	39.1%	24.3%	20.4%
Middle	8	66.7%	69.0%	76.8%	81.6%	2	16.7%	8.0%	28.2%	27.4%
Upper	2	16.7%	23.0%	10.8%	12.0%	3	25.0%	37.9%	35.9%	42.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.3%	6.5%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.2%	26.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	68.2%	67.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.6%	6.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	6.7%	1.0%	4.5%	2.0%
Moderate	9	12.0%	10.7%	9.6%	7.9%	13	17.3%	9.3%	16.4%	10.6%
Middle	58	77.3%	80.3%	74.9%	73.1%	17	22.7%	20.5%	24.1%	20.7%
Upper	8	10.7%	9.0%	15.5%	19.1%	21	28.0%	36.7%	41.9%	50.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	25.3%	32.4%	13.1%	16.0%
Total	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	6.9%	16.3%	9.8%	9.0%
Middle	53	73.6%	60.0%	67.8%	69.4%
Upper	14	19.4%	23.7%	18.1%	19.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	4.4%	1.8%
Total	*72*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*38*	52.8%	21.5%	43.6%	32.0%
	By Loan Size				
$100,000 or less	42	58.3%	11.8%	96.3%	44.6%
$100,001-$250,000	11	15.3%	12.2%	1.7%	12.0%
$250,001-$1 Million	19	26.4%	76.0%	2.0%	43.4%
Total	*72*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Utica-Rome, NY (MSA 46540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	8	7.8%	4.4%	4.9%	2.9%	10	9.7%	5.2%	8.3%	4.7%
Moderate	8	7.8%	4.5%	8.1%	5.3%	43	41.7%	32.2%	25.4%	18.8%
Middle	49	47.6%	41.6%	55.1%	50.6%	19	18.4%	20.9%	25.1%	23.7%
Upper	38	36.9%	49.5%	31.9%	41.2%	29	28.2%	39.2%	34.1%	46.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.9%	2.6%	7.1%	6.7%
Total	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	3.7%	1.2%	2.9%	1.5%	15	13.9%	8.7%	8.7%	5.5%
Moderate	8	7.4%	5.1%	5.8%	4.2%	19	17.6%	11.0%	17.4%	12.9%
Middle	61	56.5%	51.0%	57.3%	51.8%	30	27.8%	22.3%	24.9%	22.2%
Upper	35	32.4%	42.7%	34.0%	42.5%	42	38.9%	56.0%	43.0%	53.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.9%	2.1%	6.0%	6.1%
Total	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*108*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.8%	0.2%	3.6%	2.8%	4	7.3%	6.0%	9.6%	5.8%
Moderate	4	7.3%	6.4%	5.6%	5.2%	15	27.3%	16.5%	16.7%	13.4%
Middle	22	40.0%	33.7%	56.2%	52.9%	11	20.0%	24.6%	22.1%	21.3%
Upper	28	50.9%	59.7%	34.7%	39.2%	24	43.6%	52.1%	49.4%	57.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.8%	0.8%	2.2%	1.9%
Total	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.0%	0.4%	0	0.0%	0.0%	5.0%	0.2%
Moderate	0	0.0%	0.0%	20.0%	7.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	98.9%	50.0%	58.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	50.0%	1.1%	20.0%	34.0%	0	0.0%	0.0%	5.0%	0.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	90.0%	99.6%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	13	4.9%	2.4%	4.1%	2.3%	29	10.8%	6.0%	8.5%	4.5%
Moderate	20	7.5%	4.4%	7.1%	5.2%	77	28.7%	19.8%	21.8%	15.2%
Middle	133	49.6%	49.9%	55.9%	51.8%	60	22.4%	19.7%	24.6%	20.8%
Upper	102	38.1%	43.3%	32.8%	40.7%	95	35.4%	42.6%	38.4%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	2.6%	11.8%	6.6%	15.6%
Total	*268*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*268*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	17	8.8%	6.6%	10.7%	16.6%
Moderate	23	11.9%	23.9%	10.9%	12.8%
Middle	87	44.8%	23.4%	46.5%	38.0%
Upper	66	34.0%	40.1%	29.0%	25.9%
Unknown	1	0.5%	6.0%	1.5%	6.3%
Tract Unknown	0	0.0%	0.0%	1.4%	0.5%
Total	*194*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*118*	60.8%	26.9%	46.5%	34.3%
	By Loan Size				
$100,000 or less	156	80.4%	25.0%	93.1%	38.0%
$100,001-$250,000	24	12.4%	25.6%	4.0%	18.4%
$250,001-$1 Million	14	7.2%	49.5%	2.9%	43.6%
Total	*194*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Utica-Rome, NY (MSA 46540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	5	5.3%	2.3%	5.6%	2.9%	5	5.3%	3.0%	7.9%	4.6%
Moderate	12	12.6%	9.6%	7.5%	5.2%	30	31.6%	25.0%	22.4%	17.0%
Middle	51	53.7%	47.3%	56.1%	51.6%	18	18.9%	17.2%	23.5%	22.8%
Upper	27	28.4%	40.8%	30.8%	40.3%	29	30.5%	41.2%	31.3%	43.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	13.7%	13.5%	14.9%	12.6%
Total	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.7%	1.5%	5	20.8%	15.0%	7.9%	5.0%
Moderate	2	8.3%	5.9%	5.6%	3.8%	7	29.2%	25.1%	16.3%	12.1%
Middle	14	58.3%	54.9%	59.7%	55.2%	3	12.5%	8.0%	25.2%	22.2%
Upper	8	33.3%	39.2%	32.1%	39.5%	8	33.3%	41.3%	43.3%	51.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.2%	10.6%	7.3%	9.1%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	6	7.8%	6.3%	5.9%	4.2%	19	24.7%	18.8%	12.6%	6.3%
Moderate	8	10.4%	9.5%	5.2%	4.4%	20	26.0%	20.8%	20.5%	13.0%
Middle	53	68.8%	72.3%	63.8%	57.3%	20	26.0%	17.4%	28.4%	23.2%
Upper	10	13.0%	11.8%	25.0%	34.2%	17	22.1%	41.7%	36.8%	53.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.3%	1.3%	1.7%	3.8%
Total	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	14.3%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	22.2%	28.6%	13.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	77.8%	42.9%	69.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	14.3%	17.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	11	5.5%	1.1%	4.8%	2.5%	29	14.5%	3.1%	8.9%	4.5%
Moderate	24	12.0%	15.5%	6.5%	5.2%	57	28.5%	12.5%	20.2%	14.6%
Middle	120	60.0%	63.8%	58.9%	53.8%	41	20.5%	7.9%	25.1%	21.5%
Upper	45	22.5%	19.6%	29.8%	38.5%	54	27.0%	20.8%	35.9%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	9.5%	55.8%	9.9%	15.6%
Total	*200*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*200*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	4	3.0%	1.5%	12.0%	13.6%
Moderate	20	14.9%	14.1%	11.0%	15.0%
Middle	74	55.2%	50.5%	45.2%	39.7%
Upper	35	26.1%	28.9%	29.7%	25.7%
Unknown	1	0.7%	5.0%	1.2%	5.6%
Tract Unknown	0	0.0%	0.0%	0.9%	0.3%
Total	*134*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*72*	53.7%	16.4%	48.2%	34.0%
	By Loan Size				
$100,000 or less	89	66.4%	17.9%	93.0%	37.3%
$100,001-$250,000	23	17.2%	19.9%	3.7%	15.7%
$250,001-$1 Million	22	16.4%	62.2%	3.3%	47.0%
Total	*134*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Utica-Rome, NY (MSA 46540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	2.1%	0.7%	2.4%	1.3%	7	7.4%	5.0%	8.3%	4.8%
Moderate	8	8.5%	7.0%	9.0%	5.7%	24	25.5%	19.4%	23.0%	17.4%
Middle	53	56.4%	46.5%	56.8%	53.8%	29	30.9%	33.9%	25.4%	24.2%
Upper	31	33.0%	45.8%	31.8%	39.1%	19	20.2%	29.4%	31.6%	44.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	16.0%	12.2%	11.8%	9.6%
Total	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.7%	0.8%	0	0.0%	0.0%	5.4%	2.9%
Moderate	1	2.6%	1.8%	6.8%	4.3%	10	26.3%	15.7%	15.0%	11.2%
Middle	22	57.9%	50.3%	57.8%	54.3%	7	18.4%	19.0%	24.3%	19.7%
Upper	15	39.5%	47.9%	33.6%	40.6%	14	36.8%	47.9%	46.1%	55.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	18.4%	17.5%	9.1%	11.0%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	3.9%	2.2%	3.4%	2.1%	15	29.4%	12.2%	9.9%	5.2%
Moderate	5	9.8%	7.7%	8.8%	6.5%	11	21.6%	22.4%	23.3%	15.1%
Middle	38	74.5%	82.7%	63.6%	58.9%	9	17.6%	14.2%	26.9%	24.6%
Upper	6	11.8%	7.5%	24.2%	32.5%	16	31.4%	51.2%	38.6%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.4%	2.6%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	15.4%	0.9%	20.0%	59.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	15.4%	9.9%	10.0%	3.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	38.5%	37.8%	40.0%	13.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	30.8%	51.4%	30.0%	23.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	100.0%	100.0%	100.0%	100.0%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	6	3.1%	0.7%	2.4%	4.3%	22	11.2%	2.2%	7.6%	3.9%
Moderate	16	8.2%	7.4%	8.2%	5.2%	45	23.0%	10.5%	20.3%	14.3%
Middle	118	60.2%	44.1%	58.4%	52.0%	45	23.0%	16.4%	25.2%	21.4%
Upper	56	28.6%	47.8%	30.9%	38.5%	49	25.0%	20.1%	37.8%	45.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	35	17.9%	50.8%	9.1%	14.6%
Total	*196*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*196*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	4.0%	1.2%	4.6%	2.5%
Moderate	9	6.0%	3.3%	14.1%	13.1%
Middle	92	60.9%	56.2%	50.4%	50.2%
Upper	43	28.5%	33.8%	29.7%	30.0%
Unknown	1	0.7%	5.5%	1.2%	4.2%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*151*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*109*	72.2%	31.8%	50.6%	38.7%
	By Loan Size				
$100,000 or less	112	74.2%	22.2%	92.9%	38.6%
$100,001-$250,000	23	15.2%	22.8%	4.4%	19.6%
$250,001-$1 Million	16	10.6%	55.0%	2.8%	41.8%
Total	*151*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Utica-Rome, NY (MSA 46540)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	0.8%	0.4%	2.4%	1.3%	13	10.7%	6.2%	9.6%	5.3%
Moderate	15	12.3%	7.2%	8.7%	5.5%	33	27.0%	18.8%	24.9%	19.4%
Middle	72	59.0%	56.8%	57.3%	54.0%	26	21.3%	21.0%	23.3%	23.5%
Upper	34	27.9%	35.7%	31.5%	39.2%	35	28.7%	44.4%	27.2%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	12.3%	9.6%	15.0%	12.9%
Total	*122*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*122*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	2.2%	0.9%	1.6%	0.8%	2	4.3%	2.1%	7.9%	4.3%
Moderate	0	0.0%	0.0%	7.2%	4.2%	9	19.6%	15.2%	17.8%	12.8%
Middle	25	54.3%	50.1%	60.3%	59.4%	13	28.3%	26.6%	23.9%	20.8%
Upper	20	43.5%	49.0%	30.9%	35.7%	19	41.3%	50.2%	42.9%	51.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	6.5%	5.8%	7.5%	10.7%
Total	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	3	7.9%	10.5%	3.4%	2.1%	6	15.8%	8.5%	14.8%	7.2%
Moderate	4	10.5%	7.6%	6.9%	5.0%	11	28.9%	23.3%	23.4%	15.7%
Middle	18	47.4%	36.2%	64.1%	58.3%	15	39.5%	33.8%	24.9%	21.6%
Upper	13	34.2%	45.8%	25.6%	34.5%	6	15.8%	34.4%	35.2%	53.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.7%	2.3%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	4	36.4%	7.4%	28.0%	3.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	36.4%	25.9%	40.0%	19.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	27.3%	66.7%	32.0%	76.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	100.0%	100.0%	100.0%	100.0%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	9	4.1%	2.0%	2.4%	1.2%	21	9.7%	4.1%	10.1%	4.9%
Moderate	19	8.8%	4.2%	7.8%	4.8%	53	24.4%	14.5%	22.1%	16.3%
Middle	119	54.8%	49.1%	59.7%	55.2%	54	24.9%	18.4%	23.7%	21.8%
Upper	70	32.3%	44.7%	30.1%	38.7%	60	27.6%	37.0%	34.1%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	13.4%	25.9%	10.0%	14.0%
Total	*217*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*217*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	4	3.0%	1.3%	4.6%	3.1%
Moderate	13	9.7%	7.5%	14.1%	14.9%
Middle	83	61.9%	54.7%	51.3%	53.1%
Upper	32	23.9%	33.8%	25.7%	24.7%
Unknown	2	1.5%	2.7%	1.8%	3.4%
Tract Unknown	0	0.0%	0.0%	2.5%	0.8%
Total	*134*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*77*	57.5%	25.8%	48.7%	36.9%
	By Loan Size				
$100,000 or less	85	63.4%	15.6%	92.6%	34.7%
$100,001-$250,000	20	14.9%	16.0%	3.9%	17.0%
$250,001-$1 Million	29	21.6%	68.4%	3.5%	48.4%
Total	*134*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Utica-Rome, NY (MSA 46540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	5	3.4%	1.7%	3.4%	1.8%	15	10.2%	6.5%	8.2%	4.6%
Moderate	13	8.8%	6.3%	8.9%	5.7%	31	21.1%	15.3%	23.3%	17.5%
Middle	75	51.0%	47.2%	56.2%	53.4%	29	19.7%	21.1%	23.4%	22.5%
Upper	54	36.7%	44.7%	31.5%	39.1%	39	26.5%	34.7%	31.6%	44.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	33	22.4%	22.4%	13.6%	11.1%
Total	*147*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*147*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	5.7%	3.9%	1.8%	0.9%	2	5.7%	3.2%	6.1%	3.4%
Moderate	0	0.0%	0.0%	7.3%	4.5%	5	14.3%	9.6%	20.4%	14.2%
Middle	18	51.4%	47.4%	59.0%	56.6%	7	20.0%	19.4%	25.1%	22.3%
Upper	15	42.9%	48.7%	31.9%	38.0%	12	34.3%	41.3%	40.2%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	25.7%	26.5%	8.2%	10.5%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.7%	0.7%	2.6%	1.3%	11	18.6%	10.1%	10.5%	5.1%
Moderate	6	10.2%	15.0%	6.2%	3.2%	18	30.5%	28.4%	20.3%	12.5%
Middle	41	69.5%	61.5%	64.8%	62.3%	9	15.3%	13.4%	26.9%	23.5%
Upper	11	18.6%	22.8%	26.3%	33.2%	20	33.9%	45.8%	40.2%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.7%	2.3%	2.1%	3.0%
Total	*59*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	4.3%	0.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	39.1%	32.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	34.8%	62.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	21.7%	5.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	8	3.3%	2.1%	2.8%	1.4%	28	11.5%	5.9%	7.9%	4.0%
Moderate	21	8.6%	6.5%	8.0%	6.5%	54	22.2%	14.3%	21.7%	15.3%
Middle	134	55.1%	47.0%	58.6%	55.3%	45	18.5%	20.4%	24.5%	21.4%
Upper	80	32.9%	44.4%	30.6%	36.7%	71	29.2%	35.8%	35.8%	44.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	45	18.5%	23.7%	10.1%	14.9%
Total	*243*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*243*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	2.8%	1.2%	4.4%	2.9%
Moderate	14	8.0%	11.8%	13.5%	13.5%
Middle	110	62.5%	57.0%	51.0%	53.2%
Upper	47	26.7%	30.0%	27.1%	26.9%
Unknown	0	0.0%	0.0%	1.3%	2.8%
Tract Unknown	0	0.0%	0.0%	2.6%	0.8%
Total	*176*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*103*	58.5%	29.7%	43.7%	37.5%
	By Loan Size				
$100,000 or less	112	63.6%	18.2%	92.8%	37.7%
$100,001-$250,000	30	17.0%	17.7%	4.3%	21.1%
$250,001-$1 Million	34	19.3%	64.1%	2.9%	41.2%
Total	*176*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Watertown-Fort Drum, NY (MSA 48060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	7.4%	3.9%	5.8%	3.1%
Moderate	2	7.4%	2.1%	9.6%	6.3%	11	40.7%	21.8%	18.0%	12.2%
Middle	23	85.2%	81.5%	81.3%	83.0%	4	14.8%	13.6%	26.6%	23.6%
Upper	2	7.4%	16.4%	9.1%	10.7%	10	37.0%	60.6%	42.3%	53.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.3%	7.7%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	15.6%	6.7%	4.3%
Moderate	2	20.0%	13.1%	7.8%	5.3%	2	20.0%	12.0%	14.9%	9.6%
Middle	8	80.0%	86.9%	85.5%	88.2%	2	20.0%	18.3%	25.1%	20.9%
Upper	0	0.0%	0.0%	6.7%	6.5%	3	30.0%	31.0%	45.7%	57.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	20.0%	23.1%	7.6%	8.1%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.5%	2.4%
Moderate	0	0.0%	0.0%	4.3%	3.9%	0	0.0%	0.0%	14.0%	13.1%
Middle	6	85.7%	79.6%	84.1%	84.8%	1	14.3%	19.6%	23.2%	18.3%
Upper	1	14.3%	20.4%	11.6%	11.3%	6	85.7%	80.4%	55.5%	63.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.8%	2.7%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	38.5%	32.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	61.5%	67.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.7%	3.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	92.3%	96.6%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	6.8%	6.3%	6.0%	3.3%
Moderate	4	9.1%	4.5%	8.9%	6.6%	13	29.5%	17.3%	16.8%	11.4%
Middle	37	84.1%	82.5%	82.5%	83.9%	7	15.9%	15.3%	25.8%	22.3%
Upper	3	6.8%	13.0%	8.6%	9.5%	19	43.2%	55.7%	44.0%	53.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.5%	5.4%	7.5%	9.6%
Total	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	7.7%	0.4%	13.5%	12.8%
Middle	11	84.6%	98.7%	79.0%	83.7%
Upper	1	7.7%	1.0%	6.2%	2.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.6%
Total	*13*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	46.2%	8.9%	48.3%	33.1%
	By Loan Size				
$100,000 or less	6	46.2%	6.9%	87.5%	33.0%
$100,001-$250,000	3	23.1%	15.5%	8.4%	27.1%
$250,001-$1 Million	4	30.8%	77.7%	4.1%	39.9%
Total	*13*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Watertown-Fort Drum, NY (MSA 48060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.3%	1.5%
Moderate	2	9.5%	8.3%	8.4%	5.2%	7	33.3%	26.9%	17.3%	11.7%
Middle	18	85.7%	86.7%	85.1%	88.3%	8	38.1%	42.4%	27.2%	26.0%
Upper	1	4.8%	5.0%	6.6%	6.5%	3	14.3%	17.1%	37.3%	46.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	14.3%	13.6%	14.9%	14.4%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.7%	2.5%
Moderate	0	0.0%	0.0%	8.2%	5.8%	1	50.0%	36.0%	13.9%	8.7%
Middle	2	100.0%	100.0%	82.1%	84.5%	0	0.0%	0.0%	19.2%	16.7%
Upper	0	0.0%	0.0%	9.7%	9.7%	1	50.0%	64.0%	41.5%	47.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	20.6%	24.9%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.0%	4.0%
Moderate	0	0.0%	0.0%	7.0%	5.2%	0	0.0%	0.0%	23.7%	13.7%
Middle	1	100.0%	100.0%	84.9%	82.7%	1	100.0%	100.0%	26.9%	25.4%
Upper	0	0.0%	0.0%	8.1%	12.1%	0	0.0%	0.0%	39.0%	54.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.4%	2.7%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	40.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	66.7%	59.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.6%	1.7%
Moderate	2	7.7%	5.3%	8.2%	9.9%	8	30.8%	19.3%	17.4%	9.6%
Middle	23	88.5%	91.5%	84.2%	83.4%	9	34.6%	27.3%	25.0%	20.5%
Upper	1	3.8%	3.2%	7.6%	6.6%	4	15.4%	14.7%	38.4%	40.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	19.2%	38.7%	14.6%	27.3%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	22.2%	15.5%	14.6%	15.7%
Middle	6	66.7%	82.2%	77.1%	78.5%
Upper	1	11.1%	2.4%	6.4%	5.2%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	1.8%	0.5%
Total	*9*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*7*	77.8%	71.5%	46.8%	40.7%
	By Loan Size				
$100,000 or less	4	44.4%	7.8%	89.0%	33.6%
$100,001-$250,000	2	22.2%	16.1%	6.1%	20.1%
$250,001-$1 Million	3	33.3%	76.1%	4.9%	46.3%
Total	*9*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Watertown-Fort Drum, NY (MSA 48060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.3%	1.5%
Moderate	1	5.3%	2.1%	8.0%	5.3%	1	5.3%	4.0%	13.8%	9.1%
Middle	14	73.7%	83.0%	71.6%	72.6%	6	31.6%	18.5%	22.5%	19.4%
Upper	4	21.1%	14.9%	20.3%	22.0%	7	36.8%	51.3%	45.8%	56.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	5	26.3%	26.2%	14.6%	13.8%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	2.1%
Moderate	1	12.5%	8.8%	9.5%	6.3%	2	25.0%	19.6%	11.5%	6.8%
Middle	6	75.0%	79.5%	69.0%	71.4%	0	0.0%	0.0%	17.8%	13.9%
Upper	1	12.5%	11.7%	21.5%	22.3%	5	62.5%	69.5%	42.6%	49.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	10.9%	23.9%	28.2%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.9%	3.9%
Moderate	1	25.0%	1.4%	7.7%	4.3%	0	0.0%	0.0%	18.4%	10.2%
Middle	2	50.0%	89.9%	72.7%	73.3%	2	50.0%	4.9%	26.8%	22.6%
Upper	1	25.0%	8.7%	19.4%	21.6%	2	50.0%	95.1%	44.4%	57.5%
Unknown	0	0.0%	0.0%	0.2%	0.8%	0	0.0%	0.0%	2.5%	5.9%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	6.7%	40.0%	39.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	93.3%	40.0%	57.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.0%	3.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.3%	1.7%
Moderate	5	14.3%	4.9%	8.6%	6.8%	3	8.6%	3.5%	13.8%	8.1%
Middle	24	68.6%	87.8%	70.8%	71.7%	8	22.9%	7.3%	21.6%	17.2%
Upper	6	17.1%	7.3%	20.5%	21.4%	14	40.0%	30.1%	44.4%	52.2%
Unknown	0	0.0%	0.0%	0.1%	0.1%	10	28.6%	59.1%	15.9%	20.7%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	14.3%	12.5%	15.0%	17.6%
Middle	7	50.0%	71.3%	62.6%	61.4%
Upper	5	35.7%	16.2%	22.4%	21.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*14*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*9*	64.3%	73.7%	42.0%	31.6%
	By Loan Size				
$100,000 or less	11	78.6%	30.7%	89.0%	33.7%
$100,001-$250,000	1	7.1%	10.6%	6.8%	22.5%
$250,001-$1 Million	2	14.3%	58.6%	4.3%	43.7%
Total	*14*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Watertown-Fort Drum, NY (MSA 48060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.5%	1.2%
Moderate	2	6.9%	5.5%	8.1%	5.1%	1	3.4%	2.6%	11.9%	7.3%
Middle	20	69.0%	66.2%	71.7%	73.4%	8	27.6%	22.4%	24.5%	21.8%
Upper	7	24.1%	28.3%	20.2%	21.5%	13	44.8%	47.5%	42.6%	51.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	24.1%	27.4%	18.5%	18.3%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	1.3%
Moderate	2	22.2%	16.9%	9.0%	6.0%	2	22.2%	16.4%	10.3%	6.7%
Middle	2	22.2%	20.2%	68.3%	69.1%	2	22.2%	21.8%	21.3%	16.8%
Upper	5	55.6%	62.9%	22.7%	24.9%	2	22.2%	30.2%	44.0%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	33.3%	31.5%	20.6%	25.6%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.1%	6.2%
Moderate	1	100.0%	100.0%	8.1%	4.4%	0	0.0%	0.0%	18.2%	15.0%
Middle	0	0.0%	0.0%	73.7%	75.1%	1	100.0%	100.0%	28.8%	20.1%
Upper	0	0.0%	0.0%	18.0%	20.4%	0	0.0%	0.0%	43.0%	54.8%
Unknown	0	0.0%	0.0%	0.2%	0.1%	0	0.0%	0.0%	1.9%	3.9%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	28.6%	34.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	64.3%	63.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	7.1%	2.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	1.5%
Moderate	5	12.8%	7.8%	8.5%	6.1%	3	7.7%	5.3%	12.6%	7.4%
Middle	22	56.4%	57.1%	71.1%	72.0%	11	28.2%	22.4%	24.3%	19.7%
Upper	12	30.8%	35.1%	20.4%	21.9%	15	38.5%	44.1%	42.8%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	25.6%	28.2%	16.3%	21.8%
Total	*39*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*39*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	16.7%	9.4%	17.9%	22.4%
Middle	7	58.3%	58.3%	59.8%	52.7%
Upper	3	25.0%	32.3%	20.2%	24.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.2%	0.6%
Total	*12*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	50.0%	13.9%	44.8%	33.1%
	By Loan Size				
$100,000 or less	7	58.3%	9.1%	87.2%	30.0%
$100,001-$250,000	0	0.0%	0.0%	7.5%	21.3%
$250,001-$1 Million	5	41.7%	90.9%	5.4%	48.7%
Total	*12*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Watertown-Fort Drum, NY (MSA 48060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	1.1%
Moderate	2	12.5%	7.7%	9.7%	6.8%	2	12.5%	9.4%	10.0%	5.9%
Middle	13	81.3%	86.8%	70.0%	71.5%	3	18.8%	13.2%	24.8%	20.7%
Upper	1	6.3%	5.6%	20.3%	21.8%	7	43.8%	50.5%	48.1%	58.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	25.0%	26.9%	14.9%	14.1%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.1%	1.8%
Moderate	3	30.0%	28.3%	9.3%	6.0%	0	0.0%	0.0%	13.1%	8.3%
Middle	5	50.0%	54.8%	69.2%	69.8%	1	10.0%	7.4%	17.3%	13.8%
Upper	2	20.0%	16.8%	21.5%	24.2%	3	30.0%	31.4%	44.8%	52.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	60.0%	61.3%	20.8%	24.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.6%	2.5%
Moderate	1	16.7%	7.1%	5.4%	3.4%	1	16.7%	7.1%	17.0%	9.4%
Middle	1	16.7%	7.1%	75.3%	80.5%	2	33.3%	21.4%	20.3%	17.0%
Upper	4	66.7%	85.7%	19.3%	16.1%	3	50.0%	71.4%	55.4%	67.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.7%	4.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	1.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	2.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	95.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.4%	1.2%
Moderate	6	18.8%	14.5%	8.8%	5.8%	3	9.4%	6.2%	12.2%	5.9%
Middle	19	59.4%	74.6%	70.8%	63.4%	6	18.8%	11.4%	21.8%	16.4%
Upper	7	21.9%	10.9%	20.4%	30.8%	13	40.6%	44.6%	48.6%	50.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	31.3%	37.7%	14.0%	26.1%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	7.1%	1.9%	15.0%	19.0%
Middle	10	71.4%	93.5%	60.9%	56.3%
Upper	3	21.4%	4.6%	21.9%	24.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.2%	0.6%
Total	*14*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*9*	64.3%	30.3%	41.2%	35.3%
	By Loan Size				
$100,000 or less	10	71.4%	16.7%	88.0%	34.4%
$100,001-$250,000	1	7.1%	9.2%	7.9%	26.0%
$250,001-$1 Million	3	21.4%	74.2%	4.1%	39.6%
Total	*14*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	7	2.4%	0.8%	0.3%	0.1%	25	8.6%	3.4%	8.4%	4.6%
Moderate	11	3.8%	2.1%	5.9%	3.7%	81	27.7%	19.3%	23.8%	17.4%
Middle	258	88.4%	90.4%	86.2%	86.6%	73	25.0%	22.0%	22.9%	20.4%
Upper	16	5.5%	6.6%	7.7%	9.6%	102	34.9%	49.3%	33.7%	46.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	3.8%	6.0%	11.1%	10.8%
Total	*292*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*292*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.2%	0.0%	22	11.9%	8.0%	11.2%	7.0%
Moderate	11	5.9%	4.4%	4.3%	3.1%	44	23.8%	19.6%	21.2%	16.3%
Middle	166	89.7%	91.0%	88.0%	88.3%	58	31.4%	29.7%	27.6%	24.7%
Upper	8	4.3%	4.5%	7.5%	8.6%	56	30.3%	40.3%	35.1%	45.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	2.7%	2.4%	5.0%	6.2%
Total	*185*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*185*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.1%	0.0%	13	11.5%	10.2%	9.2%	6.6%
Moderate	2	1.8%	0.6%	4.2%	2.6%	19	16.8%	17.9%	21.7%	18.0%
Middle	106	93.8%	95.2%	86.5%	88.5%	30	26.5%	26.2%	26.0%	22.9%
Upper	5	4.4%	4.2%	9.2%	8.8%	44	38.9%	38.8%	40.3%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	6.2%	7.0%	2.7%	2.3%
Total	*113*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*113*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	4.9%	3.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	87.8%	73.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	7.3%	23.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	7	1.2%	0.5%	0.2%	0.1%	60	10.1%	5.3%	9.2%	5.1%
Moderate	24	4.1%	2.6%	5.2%	3.5%	144	24.3%	19.2%	22.7%	16.6%
Middle	532	89.9%	91.1%	86.7%	86.7%	161	27.2%	24.3%	24.4%	21.0%
Upper	29	4.9%	5.8%	7.8%	9.7%	202	34.1%	45.7%	34.6%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	4.2%	5.6%	9.0%	12.0%
Total	*592*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*592*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	11	4.5%	6.1%	2.4%	2.8%
Moderate	16	6.5%	7.9%	8.0%	9.0%
Middle	208	84.9%	83.3%	83.0%	82.7%
Upper	10	4.1%	2.7%	5.0%	5.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.6%	0.5%
Total	*245*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*152*	62.0%	20.7%	48.7%	30.1%
	By Loan Size				
$100,000 or less	191	78.0%	19.7%	90.1%	32.2%
$100,001-$250,000	28	11.4%	19.3%	5.5%	19.6%
$250,001-$1 Million	26	10.6%	61.0%	4.3%	48.2%
Total	*245*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	0.3%	0.1%	0.2%	0.1%	38	12.0%	6.5%	8.2%	4.5%
Moderate	27	8.5%	4.4%	5.9%	3.6%	90	28.5%	21.1%	22.9%	16.9%
Middle	275	87.0%	90.5%	85.9%	85.4%	80	25.3%	23.8%	23.5%	20.9%
Upper	13	4.1%	4.9%	7.9%	10.8%	76	24.1%	39.0%	29.5%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	10.1%	9.6%	16.0%	15.2%
Total	*316*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*316*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.1%	3	6.7%	3.9%	8.2%	4.7%
Moderate	3	6.7%	3.5%	4.3%	2.5%	14	31.1%	24.6%	18.9%	13.0%
Middle	41	91.1%	93.5%	89.2%	90.6%	12	26.7%	26.4%	27.0%	22.4%
Upper	1	2.2%	3.0%	6.4%	6.8%	14	31.1%	42.6%	35.4%	45.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.4%	2.5%	10.6%	14.4%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.1%	0.0%	20	18.2%	7.6%	15.3%	7.1%
Moderate	3	2.7%	1.1%	7.0%	4.8%	31	28.2%	17.2%	23.0%	15.8%
Middle	103	93.6%	96.4%	85.7%	85.9%	34	30.9%	25.8%	28.2%	25.8%
Upper	4	3.6%	2.5%	7.3%	9.3%	23	20.9%	40.2%	30.8%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.8%	9.2%	2.7%	3.0%
Total	*110*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*110*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.0%	5.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	33.3%	82.2%	5.0%	12.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	66.7%	17.8%	70.0%	59.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	15.0%	22.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	0.2%	0.1%	0.2%	0.4%	61	12.9%	5.2%	9.9%	4.4%
Moderate	34	7.2%	17.1%	5.8%	4.0%	135	28.5%	17.9%	22.0%	14.7%
Middle	421	88.8%	78.9%	86.6%	84.9%	126	26.6%	20.2%	25.3%	20.2%
Upper	18	3.8%	3.9%	7.4%	10.6%	113	23.8%	32.9%	31.0%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	8.2%	23.9%	11.8%	20.0%
Total	*474*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*474*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	3.3%	3.0%	2.4%	1.8%
Moderate	5	2.8%	7.9%	7.8%	8.9%
Middle	158	87.3%	77.7%	83.4%	82.7%
Upper	12	6.6%	11.4%	4.8%	6.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.6%
Total	*181*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*119*	65.7%	34.9%	51.4%	37.0%
	By Loan Size				
$100,000 or less	135	74.6%	21.6%	91.4%	35.6%
$100,001-$250,000	25	13.8%	22.8%	5.1%	21.3%
$250,001-$1 Million	21	11.6%	55.7%	3.5%	43.1%
Total	*181*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group A

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	27	8.7%	5.4%	6.8%	3.8%
Moderate	39	12.5%	9.1%	8.5%	5.7%	86	27.7%	21.1%	22.0%	15.6%
Middle	238	76.5%	76.3%	80.1%	79.6%	79	25.4%	22.0%	24.9%	22.5%
Upper	34	10.9%	14.6%	11.4%	14.8%	91	29.3%	43.0%	31.6%	45.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	28	9.0%	8.4%	14.7%	13.1%
Total	*311*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*311*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	2.8%	1.2%	6.9%	3.5%
Moderate	3	4.2%	2.4%	5.9%	4.3%	7	9.9%	6.9%	17.4%	12.3%
Middle	56	78.9%	86.3%	80.7%	80.5%	9	12.7%	9.7%	23.1%	19.7%
Upper	12	16.9%	11.3%	13.4%	15.2%	30	42.3%	50.2%	40.7%	51.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	32.4%	32.1%	12.0%	13.0%
Total	*71*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*71*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.0%	14	15.4%	4.7%	14.2%	6.5%
Moderate	6	6.6%	3.7%	8.7%	6.5%	21	23.1%	8.6%	24.2%	17.0%
Middle	72	79.1%	80.7%	82.2%	81.6%	32	35.2%	26.3%	25.5%	21.9%
Upper	13	14.3%	15.6%	9.0%	11.9%	22	24.2%	57.6%	33.3%	50.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.2%	2.9%	2.9%	3.7%
Total	*91*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*91*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	9.1%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	9.1%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	72.7%	96.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.1%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.1%	0.0%	43	9.1%	4.5%	8.6%	3.9%
Moderate	48	10.1%	7.5%	8.0%	5.3%	114	24.1%	17.6%	21.4%	14.7%
Middle	366	77.4%	78.6%	80.7%	80.2%	120	25.4%	19.7%	24.6%	21.4%
Upper	59	12.5%	13.9%	11.3%	14.5%	143	30.2%	45.2%	34.1%	46.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	53	11.2%	13.0%	11.4%	13.3%
Total	*473*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*473*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	4	1.6%	0.7%	1.4%	0.7%
Moderate	26	10.7%	26.6%	11.1%	13.0%
Middle	191	78.3%	62.0%	78.0%	75.8%
Upper	23	9.4%	10.8%	9.6%	10.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*244*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*168*	68.9%	19.9%	51.5%	34.3%
	By Loan Size				
$100,000 or less	178	73.0%	13.0%	90.5%	32.4%
$100,001-$250,000	31	12.7%	17.2%	5.7%	21.2%
$250,001-$1 Million	35	14.3%	69.9%	3.8%	46.4%
Total	*244*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.1%	0.1%	21	8.3%	4.7%	7.2%	3.8%
Moderate	28	11.1%	7.8%	8.8%	6.0%	89	35.3%	28.0%	23.7%	17.3%
Middle	195	77.4%	78.2%	78.8%	79.8%	55	21.8%	24.8%	23.6%	21.7%
Upper	29	11.5%	14.0%	12.2%	14.2%	62	24.6%	34.0%	30.2%	42.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	9.9%	8.4%	15.3%	14.8%
Total	*252*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*252*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.0%	2	2.7%	1.6%	6.7%	3.3%
Moderate	5	6.8%	5.9%	6.6%	5.2%	19	26.0%	18.8%	18.0%	13.0%
Middle	57	78.1%	75.7%	79.6%	79.6%	13	17.8%	19.8%	26.9%	22.6%
Upper	11	15.1%	18.4%	13.6%	15.0%	31	42.5%	48.0%	37.4%	47.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	8	11.0%	11.8%	11.0%	13.8%
Total	*73*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*73*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	24	20.2%	5.8%	14.2%	7.8%
Moderate	6	5.0%	2.8%	7.2%	5.2%	29	24.4%	12.0%	25.8%	17.4%
Middle	97	81.5%	85.1%	84.2%	83.7%	30	25.2%	24.3%	26.4%	24.6%
Upper	16	13.4%	12.1%	8.6%	11.1%	32	26.9%	47.4%	30.8%	46.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	3.4%	10.6%	2.8%	4.0%
Total	*119*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*119*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	72.2%	8.0%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	27.8%	84.0%	39.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.0%	49.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.1%	0.0%	47	10.5%	3.5%	8.9%	3.8%
Moderate	40	9.0%	16.5%	7.9%	6.0%	137	30.7%	21.5%	22.8%	15.2%
Middle	350	78.5%	70.8%	80.5%	77.7%	98	22.0%	20.3%	25.1%	20.9%
Upper	56	12.6%	12.7%	11.6%	16.2%	125	28.0%	32.4%	32.0%	41.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	8.7%	22.4%	11.2%	18.6%
Total	*446*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*446*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	1.7%	5.6%	1.4%	2.1%
Moderate	29	16.8%	33.2%	11.2%	17.1%
Middle	119	68.8%	50.2%	74.0%	68.6%
Upper	22	12.7%	11.1%	10.6%	11.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.8%	0.7%
Total	*173*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*84*	48.6%	19.7%	47.3%	34.2%
	By Loan Size				
$100,000 or less	83	48.0%	7.9%	90.4%	31.9%
$100,001-$250,000	43	24.9%	21.3%	5.5%	20.4%
$250,001-$1 Million	47	27.2%	70.8%	4.1%	47.7%
Total	*173*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	0.4%	0.1%	0.1%	0.0%	20	7.0%	4.2%	6.8%	3.6%
Moderate	30	10.6%	8.1%	9.5%	6.7%	68	23.9%	18.0%	22.2%	16.3%
Middle	223	78.5%	80.0%	79.5%	79.2%	79	27.8%	27.3%	24.4%	23.2%
Upper	30	10.6%	11.8%	10.9%	14.0%	85	29.9%	38.5%	31.9%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	11.3%	12.0%	14.7%	12.8%
Total	*284*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*284*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.2%	0	0.0%	0.0%	7.8%	4.7%
Moderate	3	5.0%	6.6%	6.5%	4.9%	10	16.7%	10.7%	16.9%	11.6%
Middle	53	88.3%	86.0%	80.8%	80.6%	14	23.3%	16.9%	25.9%	21.4%
Upper	4	6.7%	7.4%	12.6%	14.3%	24	40.0%	50.0%	39.0%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	20.0%	22.4%	10.5%	12.3%
Total	*60*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*60*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.1%	0.2%	17	18.5%	11.0%	13.9%	8.4%
Moderate	6	6.5%	11.6%	8.0%	7.6%	30	32.6%	33.2%	25.3%	17.6%
Middle	79	85.9%	80.1%	83.7%	82.6%	20	21.7%	19.1%	26.6%	23.3%
Upper	7	7.6%	8.3%	8.2%	9.7%	25	27.2%	36.6%	30.7%	44.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.4%	6.6%
Total	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	12.5%	2.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	68.8%	95.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	18.8%	2.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	0.2%	0.1%	0.1%	0.1%	37	8.5%	3.3%	8.9%	4.2%
Moderate	39	8.9%	7.3%	8.3%	6.1%	108	24.7%	15.7%	21.6%	14.4%
Middle	356	81.5%	82.6%	80.9%	80.5%	113	25.9%	23.2%	25.3%	21.7%
Upper	41	9.4%	10.0%	10.6%	13.2%	134	30.7%	37.7%	33.3%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	45	10.3%	20.0%	10.8%	15.8%
Total	*437*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*437*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	3.8%	5.5%	1.6%	1.4%
Moderate	11	7.0%	9.6%	11.1%	16.1%
Middle	124	79.0%	72.0%	74.0%	70.6%
Upper	16	10.2%	12.9%	10.1%	10.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.3%	1.0%
Total	*157*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*90*	57.3%	23.0%	43.0%	36.0%
	By Loan Size				
$100,000 or less	104	66.2%	16.7%	90.6%	32.6%
$100,001-$250,000	19	12.1%	14.1%	5.9%	23.0%
$250,001-$1 Million	34	21.7%	69.2%	3.6%	44.5%
Total	*157*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	3.6%	1.8%	11	13.1%	8.3%	9.9%	5.9%
Moderate	5	6.0%	4.4%	12.8%	9.1%	23	27.4%	18.2%	25.8%	19.6%
Middle	57	67.9%	63.8%	46.8%	45.3%	30	35.7%	34.2%	26.0%	25.2%
Upper	22	26.2%	31.8%	36.7%	43.9%	19	22.6%	38.5%	31.2%	42.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.2%	0.8%	7.1%	7.0%
Total	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	2.7%	1.5%	2.3%	1.3%	4	5.4%	2.9%	12.4%	7.4%
Moderate	2	2.7%	1.3%	10.5%	8.4%	17	23.0%	18.1%	19.4%	14.9%
Middle	49	66.2%	49.9%	45.5%	42.5%	15	20.3%	14.1%	24.9%	22.9%
Upper	21	28.4%	47.3%	41.7%	47.8%	36	48.6%	62.4%	38.5%	49.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.7%	2.5%	4.9%	5.4%
Total	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	3.6%	0.8%	2.6%	1.7%	1	3.6%	1.2%	10.3%	8.1%
Moderate	0	0.0%	0.0%	13.9%	11.5%	5	17.9%	8.6%	17.6%	14.7%
Middle	15	53.6%	66.9%	43.6%	40.4%	9	32.1%	21.6%	25.6%	27.0%
Upper	12	42.9%	32.2%	39.9%	46.4%	11	39.3%	62.5%	44.7%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	7.1%	6.2%	1.8%	1.6%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	25.8%	19.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	29.0%	30.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	35.5%	37.9%	0	0.0%	0.0%	3.2%	2.4%
Upper	0	0.0%	0.0%	9.7%	11.9%	0	0.0%	0.0%	3.2%	4.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	93.5%	93.5%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	1.6%	0.7%	3.4%	2.2%	16	8.6%	5.1%	10.5%	6.2%
Moderate	8	4.3%	5.3%	12.5%	9.6%	45	24.1%	16.5%	23.1%	17.7%
Middle	121	64.7%	57.1%	46.1%	44.2%	54	28.9%	23.9%	25.4%	24.1%
Upper	55	29.4%	37.0%	38.0%	44.0%	66	35.3%	49.7%	34.1%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	3.2%	4.9%	6.9%	8.9%
Total	*187*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*187*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	7.2%	22.4%	11.8%	15.9%
Moderate	5	7.2%	8.5%	15.4%	20.7%
Middle	46	66.7%	54.2%	47.7%	48.9%
Upper	13	18.8%	14.9%	24.8%	14.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.3%	0.1%
Total	*69*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*32*	46.4%	23.3%	42.0%	29.2%
	By Loan Size				
$100,000 or less	51	73.9%	20.7%	93.8%	37.5%
$100,001-$250,000	10	14.5%	21.0%	3.6%	18.4%
$250,001-$1 Million	8	11.6%	58.4%	2.5%	44.0%
Total	*69*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.7%	0.2%	4	4.3%	3.2%	7.4%	3.4%
Moderate	11	12.0%	8.1%	7.3%	4.1%	29	31.5%	21.9%	21.1%	13.1%
Middle	67	72.8%	72.4%	72.8%	76.1%	17	18.5%	13.6%	23.5%	17.3%
Upper	14	15.2%	19.5%	19.2%	19.6%	31	33.7%	52.6%	31.7%	34.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	12.0%	8.7%	16.3%	31.8%
Total	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	5.0%	3.2%	0.6%	0.2%	3	15.0%	13.2%	6.8%	3.7%
Moderate	1	5.0%	3.2%	6.7%	4.1%	5	25.0%	20.6%	15.3%	11.7%
Middle	14	70.0%	74.9%	69.7%	68.7%	3	15.0%	12.2%	26.2%	23.3%
Upper	4	20.0%	18.7%	23.0%	27.0%	5	25.0%	39.1%	38.7%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	20.0%	14.9%	13.1%	12.9%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.5%	0.5%	5	17.9%	20.0%	12.1%	5.0%
Moderate	2	7.1%	3.5%	4.6%	3.7%	8	28.6%	24.5%	22.4%	14.0%
Middle	18	64.3%	68.3%	76.8%	67.1%	10	35.7%	23.5%	29.6%	24.6%
Upper	8	28.6%	28.3%	18.1%	28.7%	4	14.3%	16.0%	33.4%	49.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.6%	16.0%	2.5%	6.5%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	50.0%	65.8%	20.0%	4.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.0%	86.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	50.0%	34.2%	53.3%	8.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.7%	0.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	2.1%	3.0%	0.7%	0.4%	12	8.3%	5.1%	8.2%	3.4%
Moderate	14	9.7%	6.9%	6.7%	7.1%	42	29.2%	20.9%	20.0%	12.4%
Middle	101	70.1%	71.2%	72.9%	71.8%	30	20.8%	13.1%	25.3%	18.1%
Upper	26	18.1%	18.9%	19.8%	20.7%	40	27.8%	47.5%	33.4%	36.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	13.9%	13.4%	13.1%	29.6%
Total	*144*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*144*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	1.7%	7.5%	3.0%	5.3%
Moderate	9	15.3%	32.2%	7.9%	10.8%
Middle	34	57.6%	33.3%	67.4%	60.0%
Upper	15	25.4%	27.0%	20.4%	23.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.5%
Total	*59*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*33*	55.9%	35.5%	52.3%	38.2%
	By Loan Size				
$100,000 or less	39	66.1%	21.1%	91.2%	31.9%
$100,001-$250,000	12	20.3%	20.1%	4.7%	16.9%
$250,001-$1 Million	8	13.6%	58.8%	4.1%	51.2%
Total	*59*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group B

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	0.9%	1.0%	0.6%	0.4%	7	6.5%	3.1%	5.0%	2.8%
Moderate	0	0.0%	0.0%	0.5%	0.4%	21	19.6%	14.1%	22.4%	16.4%
Middle	87	81.3%	75.1%	79.4%	76.8%	28	26.2%	22.9%	25.0%	22.6%
Upper	19	17.8%	23.9%	19.4%	22.4%	35	32.7%	47.0%	32.4%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	15.0%	12.8%	15.2%	14.7%
Total	*107*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*107*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.2%	0.1%	2	6.7%	4.1%	5.7%	3.4%
Moderate	0	0.0%	0.0%	0.7%	0.4%	4	13.3%	8.8%	15.1%	10.8%
Middle	24	80.0%	60.2%	75.5%	72.0%	6	20.0%	13.5%	22.7%	18.8%
Upper	6	20.0%	39.8%	23.6%	27.5%	7	23.3%	46.6%	42.8%	50.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	36.7%	27.1%	13.7%	16.4%
Total	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.4%	0.3%	6	30.0%	28.6%	11.4%	4.6%
Moderate	0	0.0%	0.0%	0.1%	0.0%	4	20.0%	18.0%	21.3%	11.3%
Middle	19	95.0%	94.7%	82.9%	86.7%	5	25.0%	23.3%	27.8%	22.7%
Upper	1	5.0%	5.3%	16.6%	13.0%	4	20.0%	27.8%	36.6%	54.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.0%	2.3%	3.0%	7.3%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	70.0%	30.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	30.0%	69.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	0.6%	0.7%	0.5%	0.3%	15	9.6%	3.6%	6.5%	3.0%
Moderate	0	0.0%	0.0%	0.5%	0.3%	29	18.5%	12.8%	20.5%	14.4%
Middle	130	82.8%	71.5%	79.2%	75.3%	39	24.8%	20.5%	25.0%	21.2%
Upper	26	16.6%	27.8%	19.8%	24.1%	46	29.3%	46.7%	35.5%	45.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	28	17.8%	16.3%	12.5%	16.2%
Total	*157*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*157*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	8.3%	11.1%	3.3%	6.2%
Moderate	1	1.4%	1.0%	1.0%	0.6%
Middle	48	66.7%	52.1%	75.4%	68.0%
Upper	17	23.6%	35.8%	20.4%	25.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*72*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*39*	54.2%	33.0%	48.0%	36.6%
	By Loan Size				
$100,000 or less	40	55.6%	13.1%	89.7%	28.0%
$100,001-$250,000	18	25.0%	23.4%	5.6%	18.3%
$250,001-$1 Million	14	19.4%	63.4%	4.7%	53.7%
Total	*72*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	1.1%	0.8%	0.7%	0.4%	6	6.3%	2.7%	6.9%	4.1%
Moderate	2	2.1%	0.8%	0.6%	0.4%	20	21.1%	15.1%	24.8%	19.0%
Middle	83	87.4%	87.5%	79.9%	75.9%	31	32.6%	31.4%	24.1%	23.0%
Upper	9	9.5%	10.8%	18.7%	23.3%	28	29.5%	44.1%	29.6%	41.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	10.5%	6.8%	14.6%	12.5%
Total	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.4%	0	0.0%	0.0%	6.1%	3.4%
Moderate	0	0.0%	0.0%	0.2%	0.1%	5	20.8%	12.9%	15.4%	10.4%
Middle	10	41.7%	38.7%	75.9%	72.4%	5	20.8%	14.8%	23.0%	19.2%
Upper	14	58.3%	61.3%	23.1%	27.1%	9	37.5%	54.2%	44.7%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	20.8%	18.1%	10.8%	12.0%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	7.7%	5.5%	0.9%	0.4%	3	11.5%	32.8%	11.7%	4.9%
Moderate	0	0.0%	0.0%	0.9%	1.6%	8	30.8%	18.2%	25.1%	14.5%
Middle	19	73.1%	71.1%	78.3%	72.6%	9	34.6%	28.1%	25.5%	22.7%
Upper	5	19.2%	23.3%	20.0%	25.5%	6	23.1%	20.9%	35.9%	55.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.8%	2.3%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	6.7%	0.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	6.7%	18.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	73.3%	75.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.3%	5.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	2.1%	0.7%	0.8%	0.4%	9	6.2%	2.3%	7.7%	3.8%
Moderate	2	1.4%	0.6%	0.6%	1.0%	33	22.6%	12.8%	22.4%	15.6%
Middle	113	77.4%	79.9%	78.5%	74.7%	45	30.8%	24.3%	24.0%	21.1%
Upper	28	19.2%	18.9%	20.1%	23.9%	43	29.5%	39.9%	34.6%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	11.0%	20.6%	11.3%	14.8%
Total	*146*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*146*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	7.8%	9.6%	3.2%	5.2%
Moderate	0	0.0%	0.0%	1.3%	0.6%
Middle	51	79.7%	69.1%	73.5%	75.2%
Upper	8	12.5%	21.4%	18.7%	17.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.3%	1.2%
Total	*64*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*41*	64.1%	37.9%	47.8%	43.1%
	By Loan Size				
$100,000 or less	36	56.3%	12.1%	91.5%	36.9%
$100,001-$250,000	13	20.3%	19.1%	5.1%	21.0%
$250,001-$1 Million	15	23.4%	68.8%	3.5%	42.0%
Total	*64*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group B

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	1.0%	0.5%	0.9%	0.7%	7	6.9%	3.4%	5.6%	2.9%
Moderate	2	2.0%	1.4%	0.6%	0.4%	15	14.9%	10.7%	20.0%	14.8%
Middle	74	73.3%	68.5%	78.5%	73.8%	28	27.7%	25.4%	26.1%	24.1%
Upper	24	23.8%	29.6%	20.0%	25.1%	20	19.8%	22.5%	32.4%	44.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	31	30.7%	38.0%	15.9%	13.6%
Total	*101*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*101*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.5%	0.5%	3	9.4%	8.0%	6.7%	3.9%
Moderate	2	6.3%	4.3%	0.8%	0.5%	5	15.6%	12.8%	16.1%	11.6%
Middle	24	75.0%	75.4%	78.6%	73.9%	8	25.0%	18.7%	23.0%	20.1%
Upper	6	18.8%	20.3%	20.1%	25.1%	12	37.5%	45.4%	42.4%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	12.5%	15.1%	11.9%	14.1%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.6%	0.8%	2	11.1%	9.9%	14.1%	7.0%
Moderate	0	0.0%	0.0%	0.9%	0.5%	4	22.2%	13.5%	20.3%	14.6%
Middle	16	88.9%	94.3%	79.9%	78.8%	7	38.9%	34.8%	25.8%	20.5%
Upper	2	11.1%	5.7%	18.6%	19.9%	5	27.8%	41.8%	37.7%	54.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	3.4%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	87.5%	88.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	12.5%	11.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	0.7%	0.4%	0.8%	0.6%	12	7.8%	4.2%	7.7%	3.4%
Moderate	4	2.6%	1.9%	0.7%	0.4%	24	15.7%	11.0%	19.0%	13.5%
Middle	116	75.8%	70.2%	78.9%	74.5%	43	28.1%	24.1%	25.1%	22.2%
Upper	32	20.9%	27.4%	19.7%	24.5%	37	24.2%	26.7%	36.0%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	37	24.2%	33.9%	12.2%	15.0%
Total	*153*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*153*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	8.7%	13.8%	3.2%	8.1%
Moderate	2	2.9%	8.9%	1.5%	1.7%
Middle	52	75.4%	70.6%	72.8%	74.0%
Upper	9	13.0%	6.7%	18.5%	14.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.9%	1.3%
Total	*69*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*34*	49.3%	31.8%	42.0%	39.8%
	By Loan Size				
$100,000 or less	41	59.4%	18.0%	91.9%	35.0%
$100,001-$250,000	16	23.2%	24.6%	4.9%	21.3%
$250,001-$1 Million	12	17.4%	57.4%	3.2%	43.6%
Total	*69*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.0%	2.1%	3.6%	1.5%
Moderate	2	8.0%	8.4%	11.5%	8.6%	9	36.0%	20.3%	13.5%	7.4%
Middle	16	64.0%	60.0%	64.2%	64.3%	8	32.0%	27.5%	20.1%	16.1%
Upper	7	28.0%	31.6%	24.3%	27.1%	7	28.0%	50.1%	53.5%	63.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.4%	11.1%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	20.0%	8.5%	5.5%	2.9%
Moderate	0	0.0%	0.0%	10.3%	8.5%	1	10.0%	9.0%	10.0%	6.2%
Middle	7	70.0%	77.1%	73.3%	73.7%	3	30.0%	45.5%	19.0%	15.8%
Upper	3	30.0%	22.9%	16.4%	17.9%	4	40.0%	37.1%	58.5%	68.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.1%	6.8%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	6.3%	1.3%	5.8%	3.3%
Moderate	2	12.5%	8.4%	11.6%	12.5%	2	12.5%	12.2%	9.3%	6.6%
Middle	10	62.5%	68.5%	72.1%	74.5%	4	25.0%	13.3%	25.6%	16.3%
Upper	4	25.0%	23.1%	16.3%	13.0%	9	56.3%	73.3%	57.0%	72.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.3%	1.3%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	36.4%	23.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	36.4%	18.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	27.3%	57.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	4	7.8%	3.3%	4.2%	1.8%
Moderate	4	7.8%	6.6%	11.4%	9.6%	12	23.5%	16.1%	12.1%	6.7%
Middle	33	64.7%	65.5%	66.9%	64.0%	15	29.4%	28.3%	20.0%	15.1%
Upper	14	27.5%	27.8%	21.7%	26.4%	20	39.2%	52.3%	54.5%	61.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.1%	15.1%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	27.8%	75.4%	22.6%	24.9%
Middle	8	44.4%	15.6%	51.0%	48.1%
Upper	5	27.8%	9.0%	20.8%	24.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	5.6%	2.9%
Total	*18*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*15*	83.3%	90.3%	44.6%	34.7%
	By Loan Size				
$100,000 or less	15	83.3%	25.6%	97.2%	56.5%
$100,001-$250,000	1	5.6%	9.3%	1.5%	9.6%
$250,001-$1 Million	2	11.1%	65.1%	1.4%	34.0%
Total	*18*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	6	20.7%	10.4%	3.7%	1.8%
Moderate	3	10.3%	8.1%	10.9%	9.8%	4	13.8%	9.3%	12.8%	8.3%
Middle	18	62.1%	50.6%	64.7%	63.4%	7	24.1%	24.4%	21.2%	18.2%
Upper	8	27.6%	41.3%	24.4%	26.8%	10	34.5%	38.9%	51.9%	60.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.9%	17.1%	10.3%	10.9%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	2.5%
Moderate	0	0.0%	0.0%	9.8%	7.7%	1	25.0%	14.2%	11.1%	6.8%
Middle	4	100.0%	100.0%	67.9%	70.5%	2	50.0%	59.8%	20.9%	18.3%
Upper	0	0.0%	0.0%	22.3%	21.8%	1	25.0%	25.9%	40.9%	48.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	23.3%	23.5%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	40.5%	10.3%	0.8%
Moderate	1	25.0%	23.8%	8.4%	1.9%	0	0.0%	0.0%	10.3%	1.9%
Middle	2	50.0%	40.5%	75.7%	24.1%	0	0.0%	0.0%	29.0%	9.1%
Upper	1	25.0%	35.7%	15.9%	74.0%	2	50.0%	59.5%	43.9%	19.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.5%	68.9%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	50.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	42.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	8	21.6%	9.0%	4.3%	1.9%
Moderate	4	10.8%	6.9%	10.4%	9.0%	5	13.5%	10.0%	12.0%	7.3%
Middle	24	64.9%	58.8%	66.6%	62.0%	9	24.3%	30.1%	21.8%	17.4%
Upper	9	24.3%	34.2%	23.0%	29.0%	13	35.1%	37.0%	48.0%	54.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.4%	14.0%	13.8%	19.3%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	24.6%	27.0%
Middle	5	83.3%	94.6%	51.3%	46.1%
Upper	1	16.7%	5.4%	18.8%	24.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	5.3%	2.7%
Total	*6*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*5*	83.3%	72.8%	52.9%	36.2%
	By Loan Size				
$100,000 or less	6	100.0%	100.0%	97.2%	52.4%
$100,001-$250,000	0	0.0%	0.0%	1.2%	8.8%
$250,001-$1 Million	0	0.0%	0.0%	1.5%	38.8%
Total	*6*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.0%	1.2%	2.0%	0.9%
Moderate	2	6.1%	3.7%	8.0%	5.4%	8	24.2%	17.9%	9.4%	5.8%
Middle	16	48.5%	40.2%	56.6%	58.7%	10	30.3%	34.6%	19.1%	14.9%
Upper	15	45.5%	56.1%	35.4%	35.9%	10	30.3%	37.3%	60.2%	69.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	12.1%	9.1%	9.3%	9.0%
Total	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.3%	2.5%
Moderate	0	0.0%	0.0%	10.0%	6.4%	0	0.0%	0.0%	4.7%	3.0%
Middle	2	100.0%	100.0%	54.0%	55.3%	0	0.0%	0.0%	17.0%	14.1%
Upper	0	0.0%	0.0%	36.0%	38.3%	0	0.0%	0.0%	46.7%	52.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	25.3%	28.3%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	1.9%
Moderate	0	0.0%	0.0%	11.8%	3.8%	0	0.0%	0.0%	7.8%	12.4%
Middle	0	0.0%	0.0%	64.7%	81.0%	0	0.0%	0.0%	19.6%	11.0%
Upper	0	0.0%	0.0%	23.5%	15.1%	0	0.0%	0.0%	64.7%	72.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	2.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	28.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	50.0%	71.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.9%	1.1%	3.4%	1.4%
Moderate	2	5.7%	3.7%	8.9%	5.7%	8	22.9%	17.5%	7.9%	5.1%
Middle	18	51.4%	41.5%	56.1%	58.0%	10	28.6%	33.9%	18.5%	14.6%
Upper	15	42.9%	54.9%	35.0%	36.3%	10	28.6%	36.5%	56.3%	64.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	17.1%	11.1%	13.9%	14.7%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	25.0%	61.4%	26.6%	24.6%
Middle	9	56.3%	34.7%	44.9%	44.6%
Upper	3	18.8%	4.0%	28.5%	30.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*16*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*11*	68.8%	15.9%	44.8%	22.4%
	By Loan Size				
$100,000 or less	12	75.0%	13.6%	97.3%	46.6%
$100,001-$250,000	1	6.3%	6.9%	0.9%	5.8%
$250,001-$1 Million	3	18.8%	79.5%	1.8%	47.6%
Total	*16*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.0%	1.7%	1.1%	0.5%
Moderate	2	8.0%	15.5%	7.0%	5.1%	0	0.0%	0.0%	10.2%	7.1%
Middle	12	48.0%	45.0%	59.6%	60.1%	4	16.0%	10.5%	23.5%	21.2%
Upper	11	44.0%	39.5%	33.4%	34.8%	17	68.0%	68.4%	55.3%	61.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	12.0%	19.4%	9.9%	9.8%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.2%	2.2%
Moderate	1	14.3%	8.7%	8.2%	5.0%	1	14.3%	8.1%	7.5%	4.4%
Middle	5	71.4%	76.2%	51.8%	55.3%	1	14.3%	8.7%	17.5%	13.4%
Upper	1	14.3%	15.1%	40.0%	39.7%	5	71.4%	83.3%	53.9%	62.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.9%	18.0%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	1.4%
Moderate	0	0.0%	0.0%	6.0%	3.0%	0	0.0%	0.0%	12.0%	5.4%
Middle	3	100.0%	100.0%	62.0%	63.4%	1	33.3%	16.7%	20.0%	11.0%
Upper	0	0.0%	0.0%	32.0%	33.6%	2	66.7%	83.3%	60.0%	75.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	6.5%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	44.4%	13.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	83.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	22.2%	3.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.7%	1.3%	2.0%	1.1%
Moderate	5	13.5%	19.6%	7.8%	5.8%	1	2.7%	1.4%	9.2%	5.4%
Middle	20	54.1%	48.2%	56.6%	60.6%	6	16.2%	9.6%	20.8%	16.1%
Upper	12	32.4%	32.2%	35.5%	33.6%	24	64.9%	66.8%	54.5%	56.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	13.5%	20.9%	13.4%	21.3%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	54.5%	61.9%	24.0%	28.8%
Middle	4	36.4%	7.3%	44.6%	44.3%
Upper	1	9.1%	30.9%	24.1%	23.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	7.3%	3.1%
Total	*11*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*3*	27.3%	5.4%	41.6%	22.6%
	By Loan Size				
$100,000 or less	6	54.5%	11.1%	95.6%	42.3%
$100,001-$250,000	2	18.2%	10.2%	2.1%	11.4%
$250,001-$1 Million	3	27.3%	78.7%	2.3%	46.3%
Total	*11*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.0%	0.4%
Moderate	2	11.1%	10.2%	7.8%	6.0%	3	16.7%	10.9%	10.4%	6.5%
Middle	8	44.4%	38.4%	54.4%	57.4%	5	27.8%	22.9%	21.8%	16.6%
Upper	8	44.4%	51.4%	37.9%	36.6%	2	11.1%	11.0%	52.9%	62.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	44.4%	55.3%	13.8%	13.8%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.6%	2.0%
Moderate	0	0.0%	0.0%	7.6%	5.7%	0	0.0%	0.0%	9.6%	7.6%
Middle	2	50.0%	43.7%	59.8%	60.6%	2	50.0%	47.1%	18.5%	15.2%
Upper	2	50.0%	56.3%	32.5%	33.7%	0	0.0%	0.0%	45.0%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	52.9%	23.3%	25.4%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	0.4%
Moderate	0	0.0%	0.0%	16.7%	7.6%	2	50.0%	61.1%	14.6%	11.7%
Middle	2	50.0%	38.9%	58.3%	56.5%	1	25.0%	16.7%	20.8%	10.2%
Upper	2	50.0%	61.1%	25.0%	36.0%	1	25.0%	22.2%	60.4%	73.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	3.8%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	18.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	25.0%	18.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	50.0%	62.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.0%	0.9%
Moderate	2	7.7%	7.9%	8.4%	6.1%	5	19.2%	9.2%	10.4%	6.9%
Middle	12	46.2%	39.5%	56.4%	58.1%	8	30.8%	27.8%	20.5%	15.8%
Upper	12	46.2%	52.5%	35.2%	35.8%	3	11.5%	8.8%	50.4%	57.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	38.5%	54.2%	16.8%	18.4%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	16.7%	3.9%	27.2%	19.5%
Middle	5	83.3%	96.1%	41.0%	55.3%
Upper	0	0.0%	0.0%	24.1%	21.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	7.7%	4.2%
Total	*6*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	100.0%	100.0%	38.8%	19.5%
	By Loan Size				
$100,000 or less	5	83.3%	45.8%	98.1%	60.0%
$100,001-$250,000	1	16.7%	54.2%	0.9%	7.3%
$250,001-$1 Million	0	0.0%	0.0%	1.0%	32.7%
Total	*6*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: York-Hanover, PA (MSA 49620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	4	3.3%	1.7%	2.4%	1.0%	12	9.9%	4.9%	7.7%	4.2%
Moderate	4	3.3%	2.0%	6.8%	4.3%	37	30.6%	20.7%	22.5%	17.3%
Middle	91	75.2%	72.9%	70.5%	69.5%	23	19.0%	14.9%	23.9%	23.3%
Upper	22	18.2%	23.4%	20.4%	25.2%	38	31.4%	48.1%	27.4%	37.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	9.1%	11.4%	18.4%	18.2%
Total	*121*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*121*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	6	1.5%	1.1%	2.0%	1.3%	47	12.1%	7.1%	11.0%	6.7%
Moderate	19	4.9%	3.7%	4.5%	3.2%	89	22.9%	19.1%	19.7%	15.7%
Middle	293	75.3%	73.1%	70.1%	67.5%	114	29.3%	29.1%	26.3%	24.8%
Upper	71	18.3%	22.1%	23.3%	28.0%	127	32.6%	40.5%	33.2%	41.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	3.1%	4.1%	9.8%	11.1%
Total	*389*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*389*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	0.8%	0.3%	1.2%	0.6%	15	11.7%	7.8%	7.3%	5.2%
Moderate	10	7.8%	9.0%	5.3%	5.0%	27	21.1%	19.3%	17.0%	13.2%
Middle	97	75.8%	79.2%	69.7%	67.8%	42	32.8%	31.3%	26.8%	23.5%
Upper	20	15.6%	11.5%	23.7%	26.6%	43	33.6%	40.3%	44.4%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.8%	1.3%	4.5%	8.0%
Total	*128*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*128*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	100.0%	100.0%	38.9%	11.9%	0	0.0%	0.0%	1.4%	0.2%
Moderate	0	0.0%	0.0%	5.6%	0.6%	0	0.0%	0.0%	1.4%	0.1%
Middle	0	0.0%	0.0%	50.0%	78.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	5.6%	9.0%	0	0.0%	0.0%	9.7%	1.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	87.5%	98.1%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	12	1.9%	1.4%	2.4%	1.7%	74	11.6%	6.5%	8.6%	4.6%
Moderate	33	5.2%	3.7%	6.0%	3.9%	153	23.9%	19.6%	21.1%	15.9%
Middle	481	75.3%	73.6%	70.2%	69.5%	179	28.0%	25.0%	24.7%	22.4%
Upper	113	17.7%	21.3%	21.4%	25.0%	208	32.6%	42.7%	30.4%	36.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	3.9%	6.2%	15.2%	20.6%
Total	*639*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*639*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	36	7.8%	10.2%	7.2%	9.2%
Moderate	31	6.8%	3.5%	6.1%	7.5%
Middle	309	67.3%	60.9%	66.2%	63.5%
Upper	83	18.1%	25.3%	19.8%	19.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.2%
Total	*459*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*273*	59.5%	24.2%	48.0%	36.6%
	By Loan Size				
$100,000 or less	324	70.6%	12.9%	91.5%	31.2%
$100,001-$250,000	59	12.9%	16.5%	4.0%	15.3%
$250,001-$1 Million	76	16.6%	70.5%	4.5%	53.5%
Total	*459*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: York-Hanover, PA (MSA 49620)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.2%	0.9%	8	6.9%	4.1%	6.7%	3.6%
Moderate	4	3.4%	1.5%	6.1%	4.0%	28	24.1%	17.6%	21.1%	16.0%
Middle	90	77.6%	75.4%	71.6%	70.0%	27	23.3%	23.2%	22.5%	21.8%
Upper	22	19.0%	23.0%	20.2%	25.0%	32	27.6%	37.3%	29.8%	40.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	18.1%	17.8%	19.9%	18.5%
Total	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	1.0%	0.2%	2.0%	1.0%	9	9.4%	7.3%	6.9%	3.7%
Moderate	5	5.2%	3.3%	4.9%	3.4%	26	27.1%	22.4%	15.6%	11.9%
Middle	72	75.0%	75.0%	70.8%	68.9%	20	20.8%	20.9%	22.2%	19.7%
Upper	18	18.8%	21.5%	22.4%	26.7%	27	28.1%	37.0%	33.4%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	14.6%	12.4%	21.9%	24.0%
Total	*96*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*96*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	7	8.0%	5.8%	2.8%	1.4%	17	19.3%	9.5%	8.6%	4.6%
Moderate	7	8.0%	5.6%	4.2%	2.3%	26	29.5%	19.7%	17.1%	14.0%
Middle	61	69.3%	51.7%	72.8%	72.1%	23	26.1%	21.6%	25.9%	23.5%
Upper	13	14.8%	37.0%	20.2%	24.3%	20	22.7%	46.3%	45.6%	51.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.3%	2.9%	2.8%	6.0%
Total	*88*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*88*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	19.0%	3.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	9.5%	1.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	100.0%	100.0%	69.0%	94.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	2.4%	0.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	8	2.6%	0.1%	2.2%	1.2%	34	11.1%	1.6%	6.9%	3.4%
Moderate	16	5.2%	0.7%	5.6%	3.6%	80	26.1%	5.7%	19.3%	13.8%
Middle	229	74.8%	92.7%	71.5%	71.6%	70	22.9%	6.4%	22.6%	19.7%
Upper	53	17.3%	6.6%	20.7%	23.6%	79	25.8%	10.8%	31.7%	37.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	14.1%	75.5%	19.5%	25.5%
Total	*306*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*306*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	26	10.8%	11.1%	7.8%	10.6%
Moderate	9	3.8%	4.1%	6.0%	5.9%
Middle	154	64.2%	65.6%	66.4%	64.0%
Upper	51	21.3%	19.2%	19.5%	19.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.4%	0.2%
Total	*240*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*116*	48.3%	23.6%	51.7%	39.4%
	By Loan Size				
$100,000 or less	112	46.7%	8.6%	90.9%	29.8%
$100,001-$250,000	53	22.1%	16.0%	4.1%	15.0%
$250,001-$1 Million	75	31.3%	75.4%	5.0%	55.1%
Total	*240*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: York-Hanover, PA (MSA 49620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	6	3.9%	1.5%	1.4%	0.6%	24	15.8%	7.6%	7.7%	4.2%
Moderate	13	8.6%	4.8%	6.1%	4.0%	34	22.4%	19.5%	21.7%	16.8%
Middle	95	62.5%	61.6%	69.4%	67.6%	27	17.8%	16.8%	22.2%	21.9%
Upper	38	25.0%	32.1%	23.1%	27.8%	52	34.2%	47.4%	27.3%	37.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	9.9%	8.7%	21.1%	19.9%
Total	*152*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*152*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	2.1%	2.5%	0.9%	0.5%	9	6.2%	3.0%	5.3%	2.9%
Moderate	4	2.7%	1.3%	4.8%	3.1%	28	19.2%	14.3%	13.2%	9.4%
Middle	100	68.5%	62.9%	68.6%	66.6%	15	10.3%	8.8%	18.1%	15.4%
Upper	39	26.7%	33.3%	25.7%	29.8%	65	44.5%	54.3%	32.3%	38.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	19.9%	19.6%	31.2%	33.8%
Total	*146*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*146*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	5	7.1%	2.9%	2.3%	1.4%	12	17.1%	9.8%	9.0%	4.4%
Moderate	3	4.3%	2.3%	4.6%	2.4%	17	24.3%	31.0%	14.9%	11.0%
Middle	48	68.6%	59.8%	70.0%	66.3%	20	28.6%	19.7%	26.8%	24.9%
Upper	14	20.0%	35.0%	23.1%	29.9%	19	27.1%	23.3%	45.8%	53.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.9%	16.1%	3.5%	6.0%
Total	*70*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*70*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	40.0%	1.1%	25.0%	5.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	6.3%	1.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	20.0%	95.5%	62.5%	92.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	40.0%	3.4%	6.3%	0.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	16	4.3%	1.8%	1.3%	0.7%	45	12.1%	4.2%	6.9%	3.6%
Moderate	20	5.4%	2.4%	5.6%	3.6%	79	21.2%	13.4%	18.2%	13.6%
Middle	244	65.4%	69.4%	69.1%	67.9%	62	16.6%	10.2%	20.9%	19.1%
Upper	93	24.9%	26.4%	24.0%	27.9%	136	36.5%	39.5%	30.0%	37.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	51	13.7%	32.7%	23.9%	26.6%
Total	*373*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*373*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	12	4.4%	5.2%	4.8%	7.2%
Moderate	27	9.9%	10.9%	7.3%	10.2%
Middle	171	62.6%	65.8%	66.8%	64.5%
Upper	63	23.1%	18.1%	21.1%	18.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*273*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*147*	53.8%	33.0%	48.7%	35.4%
	By Loan Size				
$100,000 or less	140	51.3%	10.2%	92.8%	34.8%
$100,001-$250,000	59	21.6%	18.2%	3.8%	17.2%
$250,001-$1 Million	74	27.1%	71.6%	3.3%	48.0%
Total	*273*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: York-Hanover, PA (MSA 49620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	1.4%	0.4%	1.1%	0.5%	21	9.9%	6.0%	7.8%	4.3%
Moderate	11	5.2%	3.7%	6.2%	4.0%	53	25.0%	19.5%	22.3%	17.7%
Middle	149	70.3%	67.5%	69.3%	67.6%	49	23.1%	24.7%	21.2%	21.1%
Upper	49	23.1%	28.5%	23.4%	27.8%	68	32.1%	41.9%	26.9%	36.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	9.9%	7.8%	21.8%	20.7%
Total	*212*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*212*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	2.1%	0.8%	1.1%	0.9%	7	5.0%	2.7%	6.5%	3.7%
Moderate	8	5.7%	3.2%	4.5%	2.9%	33	23.6%	18.0%	14.4%	10.2%
Middle	95	67.9%	67.8%	67.1%	64.7%	32	22.9%	23.5%	20.6%	18.1%
Upper	34	24.3%	28.2%	27.4%	31.5%	41	29.3%	33.7%	31.1%	36.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	27	19.3%	22.1%	27.3%	31.3%
Total	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.3%	0.3%	1.6%	1.6%	19	25.3%	11.8%	9.4%	5.1%
Moderate	6	8.0%	5.5%	5.4%	3.2%	21	28.0%	30.7%	19.7%	13.7%
Middle	52	69.3%	60.7%	69.1%	66.6%	13	17.3%	12.4%	23.9%	22.2%
Upper	16	21.3%	33.5%	23.9%	28.5%	21	28.0%	44.8%	42.6%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.3%	0.3%	4.4%	8.7%
Total	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	16.7%	8.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.8%	12.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	100.0%	100.0%	56.3%	64.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.3%	14.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	100.0%	100.0%	100.0%	100.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	7	1.6%	0.3%	1.2%	1.3%	47	10.9%	2.8%	7.4%	3.8%
Moderate	25	5.8%	2.0%	5.6%	4.2%	107	24.7%	10.9%	19.2%	13.6%
Middle	302	69.7%	81.4%	68.4%	66.4%	94	21.7%	13.7%	21.1%	18.4%
Upper	99	22.9%	16.2%	24.8%	28.1%	130	30.0%	22.1%	29.4%	33.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	55	12.7%	50.5%	23.0%	30.4%
Total	*433*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*433*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	22	7.0%	6.8%	5.4%	7.1%
Moderate	39	12.4%	11.1%	7.7%	11.4%
Middle	201	63.8%	67.0%	65.7%	63.7%
Upper	53	16.8%	15.0%	19.8%	17.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.4%
Total	*315*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*166*	52.7%	34.2%	48.4%	35.0%
	By Loan Size				
$100,000 or less	151	47.9%	10.1%	90.5%	28.5%
$100,001-$250,000	71	22.5%	17.7%	4.3%	15.3%
$250,001-$1 Million	93	29.5%	72.2%	5.2%	56.2%
Total	*315*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: York-Hanover, PA (MSA 49620)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	5	2.0%	1.0%	1.5%	0.7%	23	9.3%	5.3%	7.0%	3.8%
Moderate	13	5.3%	2.1%	6.2%	3.6%	59	24.0%	19.2%	22.8%	17.7%
Middle	175	71.1%	68.8%	70.0%	68.9%	59	24.0%	24.1%	22.9%	22.7%
Upper	53	21.5%	28.1%	22.2%	26.8%	67	27.2%	36.2%	27.0%	36.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	38	15.4%	15.2%	20.3%	19.5%
Total	*246*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*246*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	2.5%	2.4%	2.5%	1.2%	4	3.4%	2.4%	7.7%	4.4%
Moderate	11	9.3%	6.3%	4.7%	3.2%	21	17.8%	11.9%	17.2%	12.8%
Middle	82	69.5%	67.7%	68.8%	67.0%	25	21.2%	16.8%	21.7%	19.5%
Upper	22	18.6%	23.5%	24.0%	28.5%	36	30.5%	40.3%	31.5%	38.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	27.1%	28.5%	21.9%	25.2%
Total	*118*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*118*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.3%	0.2%	1.6%	1.0%	14	18.2%	14.8%	8.2%	5.3%
Moderate	6	7.8%	1.8%	4.8%	3.2%	18	23.4%	19.5%	21.1%	16.8%
Middle	61	79.2%	92.6%	71.8%	71.7%	25	32.5%	19.5%	27.3%	21.0%
Upper	9	11.7%	5.3%	21.8%	24.1%	19	24.7%	45.8%	39.4%	51.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.3%	0.5%	4.0%	5.4%
Total	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	30.8%	3.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.5%	9.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	80.0%	35.2%	50.0%	50.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	20.0%	64.8%	7.7%	36.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	9	2.0%	1.2%	1.9%	0.9%	41	9.2%	3.6%	7.3%	4.0%
Moderate	30	6.7%	2.8%	5.6%	3.6%	98	22.0%	13.3%	20.7%	15.8%
Middle	322	72.2%	62.1%	69.7%	68.0%	109	24.4%	17.2%	22.8%	21.2%
Upper	85	19.1%	33.9%	22.8%	27.5%	122	27.4%	30.2%	29.4%	36.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	76	17.0%	35.7%	19.8%	22.5%
Total	*446*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*446*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	21	7.7%	7.7%	5.1%	7.5%
Moderate	34	12.4%	11.8%	8.2%	11.9%
Middle	177	64.6%	65.9%	65.5%	63.5%
Upper	42	15.3%	14.5%	19.5%	16.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.7%	0.4%
Total	*274*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*136*	49.6%	30.5%	44.5%	38.9%
	By Loan Size				
$100,000 or less	132	48.2%	11.2%	90.5%	28.8%
$100,001-$250,000	67	24.5%	20.5%	4.6%	16.8%
$250,001-$1 Million	75	27.4%	68.3%	4.9%	54.4%
Total	*274*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Harrisburg-Carlisle, PA (MSA 25420)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	1.7%	0.9%	2.7%	1.5%	7	11.7%	6.5%	9.0%	5.3%
Moderate	9	15.0%	10.3%	13.4%	8.3%	17	28.3%	24.1%	24.5%	18.9%
Middle	26	43.3%	43.4%	51.6%	49.7%	13	21.7%	19.6%	21.5%	20.4%
Upper	24	40.0%	45.5%	32.4%	40.5%	11	18.3%	31.7%	32.9%	44.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	20.0%	18.0%	12.1%	11.3%
Total	*60*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*60*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	1.5%	1.2%	2.1%	1.2%	35	17.9%	11.2%	10.7%	6.8%
Moderate	21	10.8%	7.3%	9.6%	6.0%	58	29.7%	24.1%	20.7%	15.6%
Middle	108	55.4%	56.2%	53.7%	51.0%	42	21.5%	20.1%	23.7%	21.7%
Upper	63	32.3%	35.4%	34.6%	41.8%	54	27.7%	40.8%	36.3%	46.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	3.1%	3.8%	8.5%	9.4%
Total	*195*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*195*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.9%	0.9%	8	16.7%	11.8%	7.1%	5.4%
Moderate	2	4.2%	1.9%	7.7%	5.2%	6	12.5%	10.4%	18.3%	16.3%
Middle	25	52.1%	39.4%	56.2%	54.9%	13	27.1%	22.9%	24.8%	20.7%
Upper	21	43.8%	58.7%	35.2%	39.0%	20	41.7%	51.6%	48.0%	53.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.1%	3.3%	1.8%	3.8%
Total	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	9.1%	3.7%	21.8%	2.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	45.5%	19.6%	28.7%	19.8%	0	0.0%	0.0%	1.0%	0.1%
Middle	4	36.4%	39.2%	40.6%	45.5%	0	0.0%	0.0%	2.0%	0.1%
Upper	1	9.1%	37.4%	8.9%	32.4%	0	0.0%	0.0%	5.9%	0.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	100.0%	100.0%	91.1%	99.0%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	5	1.6%	1.6%	2.5%	1.5%	50	15.9%	7.8%	9.2%	5.0%
Moderate	37	11.8%	10.2%	11.9%	9.1%	81	25.8%	17.9%	22.7%	15.9%
Middle	163	51.9%	48.5%	52.5%	49.7%	68	21.7%	15.8%	22.3%	18.3%
Upper	109	34.7%	39.7%	33.1%	39.7%	85	27.1%	30.7%	35.2%	39.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	30	9.6%	27.7%	10.6%	21.0%
Total	*314*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*314*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	15	6.0%	3.0%	4.3%	4.6%
Moderate	40	15.9%	16.8%	16.2%	13.9%
Middle	140	55.6%	52.6%	53.0%	56.4%
Upper	57	22.6%	27.7%	25.8%	24.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.6%	0.2%
Total	*252*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*150*	59.5%	32.2%	45.2%	34.7%
	By Loan Size				
$100,000 or less	171	67.9%	11.5%	91.1%	33.2%
$100,001-$250,000	29	11.5%	12.5%	5.0%	18.8%
$250,001-$1 Million	52	20.6%	75.9%	3.9%	48.0%
Total	*252*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Harrisburg-Carlisle, PA (MSA 25420)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.4%	1.4%	3	5.9%	2.5%	9.3%	5.3%
Moderate	8	15.7%	7.4%	13.7%	8.4%	17	33.3%	22.5%	22.9%	17.1%
Middle	30	58.8%	60.6%	50.6%	48.2%	9	17.6%	15.8%	21.7%	20.7%
Upper	13	25.5%	32.0%	33.3%	42.0%	14	27.5%	44.9%	32.5%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	15.7%	14.4%	13.5%	12.4%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	2.7%	1.7%	1.7%	1.3%	3	8.1%	4.2%	7.7%	4.2%
Moderate	6	16.2%	11.8%	10.7%	6.9%	6	16.2%	8.6%	17.4%	12.7%
Middle	27	73.0%	79.6%	54.0%	51.4%	11	29.7%	21.8%	22.6%	19.6%
Upper	3	8.1%	7.0%	33.6%	40.5%	9	24.3%	51.6%	33.1%	42.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	21.6%	13.9%	19.2%	21.4%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	7.7%	6.0%	1.8%	3.1%	20	38.5%	24.5%	8.1%	4.0%
Moderate	9	17.3%	9.4%	11.7%	7.9%	17	32.7%	33.3%	18.6%	14.2%
Middle	26	50.0%	49.0%	55.2%	49.3%	9	17.3%	21.3%	26.9%	23.2%
Upper	13	25.0%	35.6%	31.2%	39.6%	6	11.5%	20.9%	44.5%	55.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.9%	3.2%
Total	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	25.0%	4.7%	21.8%	3.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	25.0%	25.1%	28.2%	10.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	12.5%	38.7%	33.3%	34.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	37.5%	31.5%	16.7%	51.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	100.0%	100.0%	100.0%	100.0%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	7	4.7%	3.4%	2.3%	1.6%	26	17.6%	1.4%	8.7%	4.4%
Moderate	25	16.9%	19.7%	12.7%	8.3%	40	27.0%	5.9%	20.8%	14.0%
Middle	84	56.8%	48.7%	51.9%	47.4%	29	19.6%	6.3%	22.3%	18.1%
Upper	32	21.6%	28.2%	33.1%	42.7%	29	19.6%	16.0%	33.6%	39.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	16.2%	70.5%	14.6%	24.4%
Total	*148*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*148*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	7	4.2%	5.6%	4.4%	4.9%
Moderate	31	18.6%	14.7%	15.7%	16.2%
Middle	87	52.1%	57.4%	53.2%	54.2%
Upper	42	25.1%	22.3%	26.2%	24.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.6%	0.1%
Total	*167*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*81*	48.5%	36.9%	50.3%	39.1%
	By Loan Size				
$100,000 or less	56	33.5%	5.9%	90.3%	29.1%
$100,001-$250,000	38	22.8%	12.9%	4.8%	16.9%
$250,001-$1 Million	73	43.7%	81.2%	5.0%	54.0%
Total	*167*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Harrisburg-Carlisle, PA (MSA 25420)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	1.3%	0.5%	0.9%	0.4%	10	13.0%	7.4%	8.6%	5.0%
Moderate	13	16.9%	9.5%	13.5%	8.8%	5	6.5%	4.5%	21.1%	15.4%
Middle	39	50.6%	58.9%	49.7%	45.3%	14	18.2%	15.6%	21.3%	20.0%
Upper	24	31.2%	31.1%	35.9%	45.5%	16	20.8%	26.3%	32.1%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	41.6%	46.2%	17.0%	16.1%
Total	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.3%	0	0.0%	0.0%	6.1%	3.3%
Moderate	6	11.8%	8.5%	10.9%	7.4%	7	13.7%	10.8%	13.6%	9.3%
Middle	31	60.8%	65.0%	50.9%	47.4%	12	23.5%	21.1%	18.9%	15.6%
Upper	14	27.5%	26.5%	37.3%	45.0%	12	23.5%	35.2%	36.1%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	39.2%	32.9%	25.3%	27.3%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.9%	1.0%	1.1%	0.5%	14	26.9%	16.0%	8.3%	4.6%
Moderate	12	23.1%	14.8%	13.3%	10.7%	9	17.3%	9.4%	17.2%	11.4%
Middle	30	57.7%	64.9%	56.3%	48.6%	14	26.9%	33.3%	25.8%	22.2%
Upper	9	17.3%	19.3%	29.3%	40.2%	13	25.0%	38.8%	45.4%	53.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.8%	2.5%	3.3%	8.9%
Total	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	6.3%	20.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	80.0%	65.9%	52.5%	17.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	20.0%	34.1%	27.5%	30.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.8%	31.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	100.0%	100.0%	100.0%	100.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	1.1%	0.3%	0.9%	1.3%	24	12.6%	4.1%	7.6%	4.1%
Moderate	39	20.5%	18.5%	12.7%	8.8%	21	11.1%	5.8%	17.9%	12.4%
Middle	102	53.7%	56.8%	50.6%	45.4%	40	21.1%	15.1%	20.7%	17.5%
Upper	47	24.7%	24.4%	35.8%	44.5%	41	21.6%	24.9%	34.5%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	64	33.7%	50.1%	19.3%	23.9%
Total	*190*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*190*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	2.7%	1.6%	2.2%	2.3%
Moderate	49	22.4%	25.7%	18.0%	20.3%
Middle	110	50.2%	44.0%	44.6%	43.0%
Upper	54	24.7%	28.7%	35.2%	34.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*219*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*109*	49.8%	37.1%	43.9%	35.6%
	By Loan Size				
$100,000 or less	90	41.1%	7.2%	91.1%	32.4%
$100,001-$250,000	47	21.5%	13.5%	4.3%	15.5%
$250,001-$1 Million	82	37.4%	79.3%	4.6%	52.1%
Total	*219*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Harrisburg-Carlisle, PA (MSA 25420)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	3.2%	1.2%	0.9%	0.4%	6	9.7%	3.4%	7.8%	4.3%
Moderate	11	17.7%	6.8%	13.3%	8.7%	10	16.1%	6.4%	21.2%	15.8%
Middle	24	38.7%	19.9%	48.4%	43.9%	11	17.7%	9.8%	21.2%	19.9%
Upper	25	40.3%	72.1%	37.4%	47.1%	15	24.2%	25.9%	31.2%	41.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	32.3%	54.5%	18.6%	18.3%
Total	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.4%	2	4.0%	1.0%	6.6%	3.7%
Moderate	4	8.0%	2.5%	12.5%	8.5%	13	26.0%	8.2%	15.4%	10.5%
Middle	25	50.0%	21.5%	50.8%	47.0%	6	12.0%	4.8%	19.3%	16.1%
Upper	21	42.0%	76.0%	35.9%	44.2%	8	16.0%	14.3%	32.7%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	42.0%	71.7%	26.1%	29.7%
Total	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	4	8.5%	4.2%	0.8%	0.5%	17	36.2%	15.9%	8.6%	4.0%
Moderate	9	19.1%	8.5%	10.9%	9.4%	17	36.2%	33.1%	19.3%	14.7%
Middle	27	57.4%	77.8%	55.1%	50.3%	7	14.9%	39.4%	28.0%	23.7%
Upper	7	14.9%	9.5%	33.1%	39.8%	6	12.8%	11.6%	41.4%	50.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	7.2%
Total	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	1	10.0%	1.9%	5.8%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	40.0%	18.0%	37.7%	16.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	40.0%	78.8%	43.5%	65.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	10.0%	1.4%	13.0%	17.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	100.0%	100.0%	100.0%	100.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	7	4.1%	1.1%	0.9%	0.4%	25	14.8%	1.5%	7.4%	3.7%
Moderate	28	16.6%	9.6%	12.9%	9.4%	40	23.7%	4.9%	18.8%	12.5%
Middle	80	47.3%	43.0%	49.9%	47.1%	24	14.2%	4.9%	21.0%	16.8%
Upper	54	32.0%	46.2%	36.4%	43.1%	29	17.2%	12.5%	32.5%	37.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	51	30.2%	76.2%	20.4%	29.6%
Total	*169*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*169*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	2.3%	1.0%	2.3%	3.0%
Moderate	46	20.9%	19.6%	19.2%	19.6%
Middle	106	48.2%	45.6%	46.6%	47.0%
Upper	63	28.6%	33.7%	30.8%	30.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.1%	0.2%
Total	*220*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*112*	50.9%	33.7%	48.5%	38.4%
	By Loan Size				
$100,000 or less	88	40.0%	7.7%	89.7%	28.0%
$100,001-$250,000	47	21.4%	13.9%	4.6%	15.5%
$250,001-$1 Million	85	38.6%	78.3%	5.7%	56.5%
Total	*220*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Harrisburg-Carlisle, PA (MSA 25420)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	1.2%	0.6%	0.8%	0.4%	5	5.8%	3.6%	7.7%	4.3%
Moderate	16	18.6%	13.4%	13.6%	9.3%	14	16.3%	13.9%	22.9%	17.4%
Middle	42	48.8%	42.9%	48.9%	44.2%	9	10.5%	10.2%	20.4%	19.1%
Upper	27	31.4%	43.1%	36.6%	46.1%	19	22.1%	33.3%	32.5%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	45.3%	38.9%	16.6%	15.5%
Total	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	5.9%	2.9%	1.4%	0.6%	2	5.9%	2.4%	7.9%	4.6%
Moderate	7	20.6%	16.7%	13.9%	10.1%	4	11.8%	7.5%	17.3%	12.4%
Middle	19	55.9%	65.1%	51.2%	49.0%	3	8.8%	7.5%	21.8%	18.5%
Upper	6	17.6%	15.3%	33.5%	40.2%	8	23.5%	41.1%	32.8%	40.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	50.0%	41.5%	20.2%	24.1%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.2%	0.6%	10	27.8%	12.7%	9.9%	4.8%
Moderate	9	25.0%	9.2%	14.7%	12.4%	10	27.8%	17.6%	21.8%	15.2%
Middle	23	63.9%	77.1%	52.6%	51.6%	10	27.8%	24.9%	25.4%	22.1%
Upper	4	11.1%	13.7%	31.4%	35.4%	4	11.1%	13.0%	39.2%	47.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.6%	31.8%	3.8%	10.1%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	8.6%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	25.0%	1.6%	42.9%	22.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	6	75.0%	98.4%	44.3%	73.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.3%	2.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	100.0%	100.0%	100.0%	100.0%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	1.8%	0.4%	1.1%	0.5%	17	10.4%	1.0%	7.9%	4.0%
Moderate	34	20.7%	5.4%	14.0%	10.6%	28	17.1%	3.7%	20.9%	14.5%
Middle	90	54.9%	83.8%	50.0%	48.1%	22	13.4%	2.9%	21.2%	17.5%
Upper	37	22.6%	10.5%	35.0%	40.8%	31	18.9%	10.6%	33.0%	39.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	66	40.2%	81.8%	17.0%	24.5%
Total	*164*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*164*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	0.5%	0.1%	2.1%	2.2%
Moderate	41	18.9%	20.3%	19.2%	19.6%
Middle	107	49.3%	46.6%	46.4%	48.0%
Upper	68	31.3%	33.0%	31.0%	30.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.3%
Total	*217*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*94*	43.3%	24.2%	43.0%	35.5%
	By Loan Size				
$100,000 or less	84	38.7%	6.6%	89.2%	27.1%
$100,001-$250,000	40	18.4%	11.3%	5.1%	16.8%
$250,001-$1 Million	93	42.9%	82.2%	5.7%	56.1%
Total	*217*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Scranton-Wilkes Barre-Hazleton, PA (MSA 42540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	2.7%	0.8%	2.1%	1.2%	10	13.5%	7.7%	10.5%	5.8%
Moderate	8	10.8%	7.1%	14.9%	10.2%	22	29.7%	19.7%	21.7%	15.4%
Middle	35	47.3%	35.8%	49.9%	46.0%	13	17.6%	19.0%	22.9%	22.0%
Upper	29	39.2%	56.3%	33.1%	42.7%	27	36.5%	51.4%	30.7%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.7%	2.2%	14.2%	12.8%
Total	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	1.0%	0.5%	0.7%	0.4%	32	15.5%	10.2%	10.6%	6.2%
Moderate	22	10.6%	8.4%	10.1%	6.7%	43	20.8%	16.3%	18.3%	13.4%
Middle	108	52.2%	46.2%	55.0%	51.5%	52	25.1%	24.7%	23.6%	22.6%
Upper	75	36.2%	44.8%	34.2%	41.4%	75	36.2%	45.9%	39.2%	48.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	2.4%	2.9%	8.3%	9.7%
Total	*207*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*207*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.0%	1.0%	11	14.1%	10.0%	8.9%	6.4%
Moderate	10	12.8%	6.3%	10.0%	8.4%	16	20.5%	21.9%	18.0%	14.5%
Middle	40	51.3%	51.8%	55.2%	52.0%	18	23.1%	20.3%	21.6%	19.1%
Upper	28	35.9%	41.9%	33.7%	38.6%	31	39.7%	45.4%	47.9%	54.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.6%	2.4%	3.5%	5.4%
Total	*78*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*78*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	5.0%	8.0%	0	0.0%	0.0%	1.0%	0.1%
Moderate	0	0.0%	0.0%	36.6%	24.3%	0	0.0%	0.0%	2.0%	0.8%
Middle	0	0.0%	0.0%	41.6%	44.8%	0	0.0%	0.0%	4.0%	0.8%
Upper	0	0.0%	0.0%	12.9%	21.1%	0	0.0%	0.0%	7.9%	2.6%
Unknown	0	0.0%	0.0%	4.0%	1.8%	0	0.0%	0.0%	85.1%	95.7%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	1.1%	0.6%	1.6%	1.4%	53	14.8%	9.5%	10.3%	5.6%
Moderate	40	11.1%	7.7%	13.1%	10.0%	81	22.6%	18.1%	20.0%	14.0%
Middle	183	51.0%	44.0%	52.0%	47.7%	83	23.1%	22.4%	22.8%	20.8%
Upper	132	36.8%	47.7%	33.3%	40.9%	133	37.0%	47.4%	35.2%	43.2%
Unknown	0	0.0%	0.0%	0.1%	0.1%	9	2.5%	2.6%	11.8%	16.5%
Total	*359*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*359*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	4	2.2%	0.5%	2.4%	2.0%
Moderate	26	14.2%	12.3%	17.7%	16.2%
Middle	88	48.1%	50.0%	51.1%	55.1%
Upper	59	32.2%	34.6%	25.7%	24.5%
Unknown	6	3.3%	2.7%	1.8%	1.7%
Tract Unknown	0	0.0%	0.0%	1.2%	0.5%
Total	*183*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*125*	68.3%	35.7%	41.9%	35.1%
	By Loan Size				
$100,000 or less	145	79.2%	22.4%	91.9%	36.0%
$100,001-$250,000	20	10.9%	18.2%	4.5%	18.8%
$250,001-$1 Million	18	9.8%	59.4%	3.6%	45.2%
Total	*183*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Scranton-Wilkes Barre-Hazleton, PA (MSA 42540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	2.4%	1.4%	1.7%	0.9%	9	10.7%	5.5%	7.3%	3.8%
Moderate	15	17.9%	10.6%	14.5%	9.4%	20	23.8%	15.1%	19.1%	12.7%
Middle	38	45.2%	41.7%	51.4%	46.8%	24	28.6%	28.1%	21.8%	19.7%
Upper	28	33.3%	45.1%	32.3%	42.8%	22	26.2%	40.0%	34.1%	47.5%
Unknown	1	1.2%	1.2%	0.0%	0.0%	9	10.7%	11.3%	17.7%	16.3%
Total	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.1%	0.6%	2	3.9%	1.3%	5.8%	3.0%
Moderate	2	3.9%	2.3%	9.5%	6.0%	4	7.8%	3.8%	15.4%	10.3%
Middle	34	66.7%	65.8%	56.2%	51.2%	13	25.5%	14.3%	22.5%	18.9%
Upper	15	29.4%	32.0%	33.2%	42.2%	28	54.9%	73.5%	40.5%	49.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	7.8%	7.1%	15.8%	18.6%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.6%	0.8%	1.2%	0.7%	14	22.2%	14.6%	9.7%	4.7%
Moderate	9	14.3%	11.9%	13.4%	8.5%	16	25.4%	23.3%	18.9%	11.5%
Middle	38	60.3%	69.6%	57.0%	54.9%	14	22.2%	16.4%	24.5%	19.0%
Upper	15	23.8%	17.6%	28.4%	35.7%	17	27.0%	44.8%	42.8%	58.2%
Unknown	0	0.0%	0.0%	0.1%	0.0%	2	3.2%	1.0%	4.1%	6.6%
Total	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	3.4%	0.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	31.0%	17.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.6%	79.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	11.5%	1.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	3.4%	0.5%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	1.5%	0.8%	1.5%	0.8%	25	12.6%	4.1%	7.2%	3.3%
Moderate	27	13.6%	7.2%	13.0%	9.1%	40	20.1%	10.6%	17.9%	11.0%
Middle	110	55.3%	53.1%	53.6%	51.0%	51	25.6%	21.7%	22.2%	17.9%
Upper	58	29.1%	38.3%	31.8%	39.0%	67	33.7%	54.5%	36.9%	44.7%
Unknown	1	0.5%	0.6%	0.1%	0.1%	16	8.0%	9.1%	15.8%	23.1%
Total	*199*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*199*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	6	4.1%	2.9%	2.3%	2.1%
Moderate	17	11.6%	19.1%	17.3%	16.5%
Middle	85	57.8%	54.7%	51.3%	52.9%
Upper	39	26.5%	23.3%	26.4%	25.0%
Unknown	0	0.0%	0.0%	1.8%	3.0%
Tract Unknown	0	0.0%	0.0%	1.0%	0.5%
Total	*147*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*89*	60.5%	35.9%	45.6%	35.7%
	By Loan Size				
$100,000 or less	95	64.6%	16.3%	91.8%	35.8%
$100,001-$250,000	25	17.0%	19.2%	4.5%	17.6%
$250,001-$1 Million	27	18.4%	64.4%	3.7%	46.6%
Total	*147*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Scranton-Wilkes Barre-Hazleton, PA (MSA 42540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.8%	0.4%	13	13.5%	6.1%	8.7%	4.5%
Moderate	11	11.5%	11.3%	11.2%	7.0%	14	14.6%	10.6%	20.8%	14.2%
Middle	58	60.4%	51.1%	59.7%	56.1%	20	20.8%	18.9%	22.2%	20.5%
Upper	27	28.1%	37.6%	28.3%	36.5%	27	28.1%	47.4%	32.4%	46.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	22	22.9%	17.0%	16.0%	14.4%
Total	*96*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*96*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.5%	0.3%	3	3.4%	1.7%	6.6%	3.4%
Moderate	7	8.0%	5.4%	9.8%	6.5%	9	10.3%	10.5%	13.4%	8.9%
Middle	55	63.2%	58.3%	61.3%	58.7%	17	19.5%	19.8%	19.7%	16.4%
Upper	25	28.7%	36.3%	28.5%	34.6%	31	35.6%	44.1%	39.9%	47.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	27	31.0%	23.9%	20.4%	23.7%
Total	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.7%	0.8%	9	22.5%	10.9%	10.3%	3.3%
Moderate	7	17.5%	6.7%	9.5%	6.5%	11	27.5%	11.5%	18.2%	11.9%
Middle	26	65.0%	76.0%	65.7%	62.1%	10	25.0%	20.1%	25.4%	20.6%
Upper	7	17.5%	17.3%	24.1%	30.7%	7	17.5%	12.4%	42.4%	57.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	7.5%	45.2%	3.7%	6.6%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	6.1%	7.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	24.2%	3.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	47.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	19.7%	41.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.7%	0.7%	25	11.1%	4.2%	8.1%	3.8%
Moderate	25	11.1%	8.5%	10.5%	6.6%	34	15.1%	10.4%	17.6%	11.5%
Middle	139	61.8%	54.3%	61.1%	56.9%	47	20.9%	19.1%	21.6%	18.0%
Upper	61	27.1%	37.2%	27.7%	35.8%	65	28.9%	44.3%	36.3%	45.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	54	24.0%	21.9%	16.3%	21.5%
Total	*225*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*225*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	1.9%	2.9%	4.3%	4.3%
Moderate	17	10.9%	9.6%	12.7%	12.0%
Middle	94	60.3%	56.5%	59.5%	60.7%
Upper	42	26.9%	31.0%	23.4%	22.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	0.1%	0.0%
Total	*156*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*77*	49.4%	24.9%	45.7%	36.5%
	By Loan Size				
$100,000 or less	75	48.1%	10.9%	91.4%	34.5%
$100,001-$250,000	45	28.8%	24.5%	4.7%	18.0%
$250,001-$1 Million	36	23.1%	64.6%	3.9%	47.5%
Total	*156*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

Bankyr1 Peeryr1

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Scranton-Wilkes Barre-Hazleton, PA (MSA 42540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	2.6%	1.1%	0.8%	0.5%	7	6.0%	2.4%	7.8%	4.0%
Moderate	9	7.8%	4.3%	11.6%	6.8%	22	19.0%	12.5%	20.9%	14.4%
Middle	75	64.7%	60.8%	60.4%	56.9%	26	22.4%	20.4%	21.0%	19.7%
Upper	29	25.0%	33.7%	27.2%	35.7%	43	37.1%	50.2%	32.7%	46.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	15.5%	14.5%	17.5%	15.7%
Total	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.7%	0.4%	0	0.0%	0.0%	5.5%	3.0%
Moderate	4	6.8%	4.4%	8.7%	5.8%	4	6.8%	4.2%	13.9%	9.0%
Middle	38	64.4%	64.0%	61.1%	57.8%	11	18.6%	16.6%	21.3%	17.1%
Upper	17	28.8%	31.7%	29.5%	36.0%	28	47.5%	57.3%	41.6%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	27.1%	21.9%	17.6%	21.3%
Total	*59*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.6%	0.6%	8	14.0%	5.1%	10.5%	4.2%
Moderate	8	14.0%	10.5%	11.1%	7.7%	16	28.1%	14.6%	16.8%	9.8%
Middle	37	64.9%	52.2%	64.2%	60.7%	16	28.1%	32.9%	23.7%	17.8%
Upper	12	21.1%	37.3%	24.1%	31.0%	14	24.6%	18.8%	44.8%	58.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	5.3%	28.6%	4.2%	10.2%
Total	*57*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*57*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	6.9%	22.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	33.3%	23.0%	29.3%	23.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	66.7%	77.0%	56.9%	34.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.9%	19.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	1.3%	0.7%	0.7%	2.3%	15	6.4%	1.6%	7.3%	3.3%
Moderate	22	9.4%	4.7%	10.6%	7.9%	42	17.9%	9.6%	17.7%	11.0%
Middle	152	64.7%	61.9%	61.2%	55.6%	53	22.6%	19.2%	21.4%	17.0%
Upper	58	24.7%	32.7%	27.5%	34.2%	85	36.2%	51.2%	37.5%	44.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	17.0%	18.4%	16.1%	24.3%
Total	*235*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*235*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	10	6.3%	3.2%	3.7%	4.9%
Moderate	18	11.3%	8.1%	12.7%	12.9%
Middle	93	58.5%	62.5%	58.7%	57.1%
Upper	36	22.6%	23.8%	22.9%	24.2%
Unknown	2	1.3%	2.4%	0.1%	0.4%
Tract Unknown	0	0.0%	0.0%	1.9%	0.6%
Total	*159*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*84*	52.8%	23.1%	49.7%	40.0%
	By Loan Size				
$100,000 or less	92	57.9%	14.2%	91.3%	35.8%
$100,001-$250,000	25	15.7%	14.0%	4.8%	18.3%
$250,001-$1 Million	42	26.4%	71.8%	4.0%	45.9%
Total	*159*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Scranton-Wilkes Barre-Hazleton, PA (MSA 42540)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	1.4%	0.7%	0.5%	0.3%	17	11.8%	5.6%	7.7%	3.8%
Moderate	21	14.6%	9.8%	11.9%	6.9%	33	22.9%	16.4%	21.7%	15.0%
Middle	88	61.1%	59.2%	59.0%	55.9%	33	22.9%	19.5%	22.3%	20.2%
Upper	33	22.9%	30.3%	28.7%	36.8%	41	28.5%	45.5%	35.0%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	13.9%	13.0%	13.3%	12.3%
Total	*144*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*144*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.6%	1	1.8%	0.9%	6.9%	4.3%
Moderate	9	15.8%	8.2%	11.4%	8.2%	5	8.8%	4.9%	14.9%	10.6%
Middle	30	52.6%	49.6%	59.8%	57.2%	12	21.1%	19.6%	21.6%	18.0%
Upper	18	31.6%	42.1%	28.0%	34.1%	21	36.8%	40.5%	40.0%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	31.6%	34.1%	16.6%	19.2%
Total	*57*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*57*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	1.4%	0.4%	0.7%	0.3%	18	25.4%	14.0%	11.4%	4.2%
Moderate	13	18.3%	8.8%	11.5%	8.1%	17	23.9%	20.1%	18.5%	11.0%
Middle	47	66.2%	79.5%	64.1%	59.4%	18	25.4%	17.5%	24.1%	17.7%
Upper	10	14.1%	11.4%	23.7%	32.2%	17	23.9%	22.9%	42.7%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.4%	25.5%	3.3%	11.0%
Total	*71*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*71*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.9%	27.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	30.9%	16.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	47.3%	51.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.9%	3.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	1.1%	0.4%	0.7%	1.7%	36	13.1%	3.9%	7.9%	3.8%
Moderate	43	15.7%	8.1%	11.8%	7.9%	55	20.1%	11.4%	18.6%	12.5%
Middle	167	60.9%	62.6%	60.0%	56.4%	63	23.0%	17.0%	22.2%	18.3%
Upper	61	22.3%	28.9%	27.5%	34.0%	79	28.8%	37.8%	37.8%	46.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	41	15.0%	29.9%	13.4%	18.9%
Total	*274*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*274*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	7	4.1%	4.0%	3.8%	5.3%
Moderate	26	15.4%	18.3%	12.6%	13.2%
Middle	94	55.6%	51.3%	57.1%	56.1%
Upper	38	22.5%	23.0%	23.5%	23.7%
Unknown	4	2.4%	3.4%	0.3%	0.8%
Tract Unknown	0	0.0%	0.0%	2.8%	0.8%
Total	*169*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*99*	58.6%	31.1%	46.0%	38.8%
	By Loan Size				
$100,000 or less	97	57.4%	17.1%	89.5%	33.0%
$100,001-$250,000	39	23.1%	23.5%	5.8%	19.9%
$250,001-$1 Million	33	19.5%	59.4%	4.6%	47.1%
Total	*169*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Altoona, PA (MSA 11020)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	3.4%	1.8%	2	13.3%	9.7%	11.0%	5.9%
Moderate	1	6.7%	5.1%	10.8%	6.3%	3	20.0%	17.9%	22.4%	16.8%
Middle	11	73.3%	72.0%	75.5%	76.1%	3	20.0%	20.3%	24.7%	25.2%
Upper	3	20.0%	22.9%	10.3%	15.9%	4	26.7%	31.5%	28.1%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	20.0%	20.6%	13.7%	13.3%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	4.5%	1.5%	2.2%	1.6%	7	10.6%	6.1%	12.9%	7.6%
Moderate	3	4.5%	3.3%	8.3%	5.6%	14	21.2%	15.8%	20.2%	14.9%
Middle	52	78.8%	82.1%	76.4%	76.0%	12	18.2%	22.3%	22.3%	20.8%
Upper	8	12.1%	13.0%	13.1%	16.8%	28	42.4%	50.7%	36.2%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	7.6%	5.2%	8.3%	9.3%
Total	*66*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*66*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	2.6%	1.2%	0.9%	0.3%	4	10.5%	6.6%	9.7%	6.0%
Moderate	4	10.5%	5.8%	7.7%	7.2%	5	13.2%	9.3%	19.2%	15.5%
Middle	29	76.3%	76.2%	77.9%	77.4%	10	26.3%	26.8%	22.9%	22.1%
Upper	4	10.5%	16.8%	13.5%	15.1%	19	50.0%	57.4%	43.8%	49.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.3%	7.1%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	16.0%	17.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.0%	5.3%	0	0.0%	0.0%	4.0%	0.2%
Middle	1	100.0%	100.0%	64.0%	77.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.0%	2.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	84.0%	97.4%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	3.3%	0.4%	2.7%	3.8%	13	10.8%	2.5%	11.5%	5.6%
Moderate	8	6.7%	1.5%	9.6%	6.0%	22	18.3%	5.5%	21.0%	13.8%
Middle	93	77.5%	92.2%	76.0%	76.3%	25	20.8%	8.4%	23.3%	20.2%
Upper	15	12.5%	5.8%	11.7%	13.9%	51	42.5%	17.9%	33.0%	37.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	7.5%	65.7%	11.2%	23.4%
Total	*120*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*120*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	8	5.6%	5.1%	5.4%	2.8%
Moderate	14	9.9%	5.7%	7.1%	3.4%
Middle	105	73.9%	85.2%	76.4%	82.4%
Upper	15	10.6%	4.1%	9.8%	11.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.4%
Total	*142*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*82*	57.7%	33.7%	45.2%	34.3%
	By Loan Size				
$100,000 or less	74	52.1%	7.5%	89.0%	25.4%
$100,001-$250,000	30	21.1%	18.4%	5.5%	17.8%
$250,001-$1 Million	38	26.8%	74.1%	5.4%	56.8%
Total	*142*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Altoona, PA (MSA 11020)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	3.0%	1.3%	1	4.3%	2.0%	9.5%	5.1%
Moderate	0	0.0%	0.0%	9.8%	5.9%	9	39.1%	27.8%	23.9%	17.8%
Middle	17	73.9%	65.9%	77.4%	78.4%	6	26.1%	29.4%	23.9%	23.4%
Upper	6	26.1%	34.1%	9.7%	14.5%	4	17.4%	33.3%	27.7%	40.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	13.0%	7.5%	15.0%	13.5%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	4.3%	1.7%	1.5%	0.9%	2	8.7%	3.4%	9.7%	5.6%
Moderate	1	4.3%	4.2%	7.2%	4.5%	6	26.1%	23.6%	20.6%	15.4%
Middle	18	78.3%	79.2%	77.6%	76.5%	6	26.1%	22.3%	24.8%	23.5%
Upper	3	13.0%	14.9%	13.7%	18.1%	6	26.1%	32.9%	28.9%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	13.0%	17.7%	16.0%	16.6%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	3.3%	1.5%	2.7%	2.0%	13	21.3%	8.9%	12.7%	4.0%
Moderate	7	11.5%	5.7%	9.5%	8.3%	15	24.6%	9.0%	20.2%	13.3%
Middle	50	82.0%	89.4%	76.6%	71.7%	16	26.2%	15.2%	24.9%	21.8%
Upper	2	3.3%	3.4%	11.1%	18.1%	9	14.8%	13.7%	36.5%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	13.1%	53.1%	5.7%	10.6%
Total	*61*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*61*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	11.1%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.1%	3.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	77.8%	95.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	2.8%	0.8%	2.6%	1.2%	16	15.0%	3.6%	10.0%	4.9%
Moderate	8	7.5%	2.4%	9.0%	5.5%	30	28.0%	23.4%	22.2%	15.9%
Middle	85	79.4%	74.4%	77.3%	78.3%	28	26.2%	24.6%	24.2%	22.1%
Upper	11	10.3%	22.4%	11.1%	15.0%	19	17.8%	30.2%	29.3%	38.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	13.1%	18.2%	14.4%	18.9%
Total	*107*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*107*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	12	9.2%	5.5%	5.9%	3.9%
Moderate	13	9.9%	7.2%	7.8%	5.9%
Middle	87	66.4%	75.0%	74.2%	76.8%
Upper	19	14.5%	12.3%	10.9%	13.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.2%
Total	*131*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*73*	55.7%	40.2%	46.0%	46.6%
	By Loan Size				
$100,000 or less	59	45.0%	9.3%	87.9%	23.5%
$100,001-$250,000	32	24.4%	19.1%	5.8%	17.8%
$250,001-$1 Million	40	30.5%	71.6%	6.3%	58.7%
Total	*131*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Altoona, PA (MSA 11020)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.1%	0.0%	4	12.1%	7.0%	10.2%	5.5%
Moderate	7	21.2%	11.4%	9.5%	5.0%	9	27.3%	23.6%	21.4%	15.8%
Middle	20	60.6%	66.5%	76.2%	75.7%	5	15.2%	14.0%	22.4%	21.9%
Upper	6	18.2%	22.2%	14.3%	19.3%	5	15.2%	27.9%	31.2%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	30.3%	27.5%	14.7%	13.1%
Total	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*33*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.0%	0.5%	5.5%	2.3%
Moderate	1	2.0%	0.3%	5.5%	3.1%	6	12.0%	4.6%	14.8%	8.5%
Middle	39	78.0%	80.6%	78.8%	78.9%	7	14.0%	6.4%	21.2%	15.4%
Upper	10	20.0%	19.1%	15.6%	18.0%	21	42.0%	34.7%	40.6%	51.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	30.0%	53.8%	17.9%	22.0%
Total	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.3%	0.1%	6	12.8%	6.4%	11.1%	3.6%
Moderate	4	8.5%	4.6%	7.5%	5.7%	7	14.9%	8.1%	15.4%	7.2%
Middle	38	80.9%	81.7%	82.3%	76.4%	19	40.4%	31.1%	26.5%	19.8%
Upper	5	10.6%	13.7%	10.0%	17.8%	15	31.9%	54.5%	38.3%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.7%	13.5%
Total	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	40.0%	3.0%	20.0%	2.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	60.0%	97.0%	80.0%	97.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	1.5%	2.3%	0.2%	0.4%	11	8.1%	0.5%	8.4%	3.4%
Moderate	12	8.9%	0.7%	7.5%	3.6%	22	16.3%	2.2%	17.8%	10.3%
Middle	100	74.1%	92.3%	78.1%	79.9%	31	23.0%	2.1%	22.4%	16.3%
Upper	21	15.6%	4.6%	14.2%	16.2%	41	30.4%	7.9%	35.8%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	30	22.2%	87.2%	15.6%	28.1%
Total	*135*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*135*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	4	2.6%	3.5%	1.8%	2.9%
Moderate	23	15.2%	14.0%	9.9%	10.2%
Middle	102	67.5%	63.0%	72.9%	71.4%
Upper	22	14.6%	19.6%	15.4%	15.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*151*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*64*	42.4%	25.8%	39.5%	37.5%
	By Loan Size				
$100,000 or less	70	46.4%	9.4%	87.5%	24.1%
$100,001-$250,000	33	21.9%	16.8%	6.0%	17.5%
$250,001-$1 Million	48	31.8%	73.8%	6.5%	58.3%
Total	*151*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Altoona, PA (MSA 11020)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.2%	0.3%	0	0.0%	0.0%	7.5%	3.9%
Moderate	2	10.5%	1.9%	7.9%	4.1%	1	5.3%	2.5%	21.3%	15.0%
Middle	15	78.9%	79.6%	79.3%	79.5%	3	15.8%	15.6%	23.4%	21.6%
Upper	2	10.5%	18.5%	12.5%	16.1%	7	36.8%	39.6%	32.1%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	42.1%	42.3%	15.6%	13.4%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.0%	4	12.9%	7.2%	6.9%	3.2%
Moderate	4	12.9%	5.5%	6.6%	3.9%	1	3.2%	2.8%	13.6%	7.8%
Middle	19	61.3%	60.2%	79.7%	81.6%	8	25.8%	17.5%	21.0%	15.8%
Upper	8	25.8%	34.3%	13.6%	14.5%	13	41.9%	59.3%	43.0%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	16.1%	13.2%	15.5%	20.7%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.1%	7	10.4%	4.4%	11.1%	5.8%
Moderate	6	9.0%	26.2%	7.2%	4.6%	18	26.9%	14.7%	17.0%	9.4%
Middle	53	79.1%	65.3%	79.4%	77.1%	17	25.4%	17.5%	25.1%	20.2%
Upper	8	11.9%	8.5%	13.2%	18.2%	22	32.8%	48.1%	43.2%	56.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	4.5%	15.3%	3.6%	8.6%
Total	*67*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*67*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	28.6%	6.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	64.3%	86.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	7.1%	6.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.2%	0.1%	11	9.4%	4.4%	7.9%	3.3%
Moderate	12	10.3%	6.2%	7.4%	4.3%	20	17.1%	3.8%	17.7%	10.4%
Middle	87	74.4%	67.5%	79.4%	80.9%	28	23.9%	16.9%	22.7%	17.1%
Upper	18	15.4%	26.3%	13.0%	14.6%	42	35.9%	51.2%	37.8%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	13.7%	23.7%	14.0%	24.6%
Total	*117*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*117*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	1.2%	1.9%	1.4%	2.4%
Moderate	25	15.3%	13.0%	9.5%	13.1%
Middle	100	61.3%	57.8%	72.9%	64.1%
Upper	36	22.1%	27.3%	14.8%	20.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.2%
Total	*163*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*74*	45.4%	33.0%	41.1%	39.7%
	By Loan Size				
$100,000 or less	64	39.3%	7.7%	84.0%	18.5%
$100,001-$250,000	37	22.7%	15.5%	6.9%	16.4%
$250,001-$1 Million	62	38.0%	76.8%	9.1%	65.1%
Total	*163*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Altoona, PA (MSA 11020)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.3%	0.1%	8	22.9%	11.3%	7.8%	4.2%
Moderate	4	11.4%	4.7%	8.7%	4.2%	5	14.3%	7.1%	21.9%	15.0%
Middle	24	68.6%	71.8%	77.2%	76.3%	6	17.1%	17.1%	23.8%	22.4%
Upper	7	20.0%	23.5%	13.9%	19.4%	8	22.9%	36.3%	33.9%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	22.9%	28.2%	12.6%	10.2%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.8%	2.9%
Moderate	2	6.9%	4.3%	8.5%	4.7%	7	24.1%	16.3%	19.7%	12.1%
Middle	25	86.2%	88.2%	78.2%	78.2%	7	24.1%	26.5%	22.0%	17.3%
Upper	2	6.9%	7.6%	13.3%	17.1%	9	31.0%	46.2%	40.8%	56.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	20.7%	11.0%	10.7%	11.2%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.2%	0.2%	12	21.8%	13.6%	12.3%	4.3%
Moderate	5	9.1%	6.3%	7.1%	3.6%	14	25.5%	21.8%	18.5%	11.4%
Middle	46	83.6%	85.6%	82.5%	83.3%	15	27.3%	24.0%	25.2%	21.3%
Upper	4	7.3%	8.2%	10.2%	13.0%	13	23.6%	33.8%	41.2%	59.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.8%	6.8%	2.9%	3.5%
Total	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	9.1%	13.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.2%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	68.2%	34.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.5%	51.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.2%	1.2%	20	16.5%	4.2%	8.2%	3.4%
Moderate	11	9.1%	2.9%	8.4%	4.0%	26	21.5%	7.4%	20.3%	12.5%
Middle	97	80.2%	87.1%	78.5%	74.0%	28	23.1%	13.5%	23.2%	18.7%
Upper	13	10.7%	10.1%	12.9%	20.8%	30	24.8%	25.4%	37.3%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	14.0%	49.5%	10.9%	17.3%
Total	*121*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*121*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	7	4.2%	2.1%	3.4%	2.8%
Moderate	22	13.3%	18.2%	9.6%	9.7%
Middle	109	65.7%	57.6%	69.2%	69.7%
Upper	28	16.9%	22.1%	13.1%	17.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	4.7%	0.6%
Total	*166*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*79*	47.6%	29.7%	36.1%	30.0%
	By Loan Size				
$100,000 or less	84	50.6%	11.2%	83.1%	16.4%
$100,001-$250,000	26	15.7%	11.5%	7.5%	16.5%
$250,001-$1 Million	56	33.7%	77.3%	9.5%	67.1%
Total	*166*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Reading, PA (MSA 39740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	5	17.9%	7.3%	6.6%	2.9%	3	10.7%	5.8%	8.8%	4.5%
Moderate	1	3.6%	2.6%	5.2%	2.9%	7	25.0%	26.6%	24.7%	19.0%
Middle	15	53.6%	51.4%	62.1%	61.3%	8	28.6%	35.9%	23.2%	23.3%
Upper	7	25.0%	38.7%	26.1%	33.0%	6	21.4%	25.9%	28.1%	38.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	14.3%	5.9%	15.2%	15.1%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	3.1%	1.3%	3.1%	1.4%	21	16.2%	9.7%	8.1%	4.8%
Moderate	0	0.0%	0.0%	3.0%	2.0%	26	20.0%	16.1%	21.2%	17.2%
Middle	93	71.5%	64.2%	62.8%	60.8%	32	24.6%	23.4%	23.6%	21.6%
Upper	33	25.4%	34.5%	31.0%	35.8%	46	35.4%	46.8%	37.5%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	3.8%	4.1%	9.6%	11.2%
Total	*130*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*130*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	3.7%	2.4%	4.1%	2.3%	10	18.5%	15.1%	8.2%	6.1%
Moderate	1	1.9%	1.7%	2.9%	1.8%	6	11.1%	9.5%	15.0%	11.9%
Middle	35	64.8%	63.9%	54.6%	54.3%	10	18.5%	23.6%	23.2%	23.8%
Upper	16	29.6%	32.0%	38.5%	41.6%	25	46.3%	47.7%	51.2%	53.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	5.6%	4.1%	2.4%	4.8%
Total	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*54*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	30.2%	22.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	9.4%	1.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.9%	66.5%	0	0.0%	0.0%	1.9%	0.2%
Upper	0	0.0%	0.0%	9.4%	10.4%	0	0.0%	0.0%	9.4%	2.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	88.7%	97.6%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	11	5.2%	2.5%	5.6%	3.8%	34	16.0%	9.8%	8.5%	4.3%
Moderate	2	0.9%	0.7%	4.5%	2.5%	39	18.4%	17.0%	22.9%	17.2%
Middle	143	67.5%	61.9%	61.6%	61.3%	50	23.6%	25.6%	23.2%	21.4%
Upper	56	26.4%	34.9%	28.3%	32.4%	77	36.3%	43.2%	32.3%	37.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	5.7%	4.4%	13.1%	19.3%
Total	*212*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*212*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	22	12.2%	15.4%	7.5%	7.1%
Moderate	6	3.3%	0.4%	3.9%	3.6%
Middle	110	60.8%	48.7%	58.9%	59.3%
Upper	43	23.8%	35.5%	28.6%	29.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.1%	0.5%
Total	*181*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*117*	64.6%	35.8%	47.7%	34.8%
	By Loan Size				
$100,000 or less	148	81.8%	19.5%	90.6%	30.7%
$100,001-$250,000	12	6.6%	11.0%	4.9%	18.0%
$250,001-$1 Million	21	11.6%	69.4%	4.5%	51.3%
Total	*181*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Reading, PA (MSA 39740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	6	22.2%	11.9%	5.5%	2.2%	2	7.4%	3.0%	8.3%	4.3%
Moderate	0	0.0%	0.0%	4.4%	2.3%	4	14.8%	9.9%	23.0%	17.8%
Middle	12	44.4%	46.8%	63.7%	62.2%	2	7.4%	8.8%	22.4%	22.3%
Upper	9	33.3%	41.3%	26.3%	33.2%	10	37.0%	50.9%	30.7%	41.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	33.3%	27.4%	15.5%	14.2%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	5.0%	1.9%	3.0%	1.1%	3	15.0%	10.1%	7.0%	3.7%
Moderate	0	0.0%	0.0%	2.7%	1.5%	2	10.0%	10.2%	15.8%	11.2%
Middle	10	50.0%	50.3%	61.4%	58.7%	3	15.0%	16.1%	20.0%	18.2%
Upper	9	45.0%	47.8%	32.8%	38.7%	5	25.0%	28.0%	38.6%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	35.0%	35.5%	18.6%	20.8%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	9	24.3%	13.0%	8.2%	2.5%	11	29.7%	14.9%	8.8%	2.8%
Moderate	1	2.7%	0.4%	2.6%	1.0%	12	32.4%	21.6%	18.2%	10.0%
Middle	25	67.6%	82.6%	61.3%	64.0%	6	16.2%	18.7%	23.1%	18.5%
Upper	2	5.4%	4.0%	27.9%	32.6%	7	18.9%	16.8%	46.6%	49.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.7%	27.9%	3.3%	19.2%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	42.0%	2.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	12.0%	4.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	42.0%	72.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.0%	20.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	16	18.6%	8.5%	5.2%	2.0%	16	18.6%	5.9%	7.9%	3.6%
Moderate	3	3.5%	2.8%	3.9%	2.3%	18	20.9%	10.5%	20.6%	13.9%
Middle	47	54.7%	48.9%	62.8%	62.7%	11	12.8%	11.4%	21.7%	18.5%
Upper	20	23.3%	39.7%	28.1%	33.0%	22	25.6%	40.2%	33.7%	37.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	22.1%	32.0%	16.0%	26.4%
Total	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*86*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	12	10.6%	15.8%	7.5%	7.2%
Moderate	4	3.5%	2.5%	4.0%	3.7%
Middle	67	59.3%	51.3%	59.8%	59.9%
Upper	30	26.5%	30.3%	27.7%	28.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.0%	0.5%
Total	*113*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*62*	54.9%	28.2%	49.4%	36.9%
	By Loan Size				
$100,000 or less	58	51.3%	10.8%	90.4%	31.0%
$100,001-$250,000	22	19.5%	15.4%	4.9%	17.8%
$250,001-$1 Million	33	29.2%	73.7%	4.7%	51.1%
Total	*113*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Reading, PA (MSA 39740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	4.0%	1.6%	3	11.1%	7.5%	9.2%	4.9%
Moderate	0	0.0%	0.0%	4.2%	2.4%	4	14.8%	14.0%	24.6%	19.2%
Middle	11	40.7%	32.4%	63.6%	60.4%	4	14.8%	13.8%	23.3%	24.0%
Upper	16	59.3%	67.6%	28.2%	35.6%	11	40.7%	50.9%	27.3%	37.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	18.5%	13.7%	15.6%	14.2%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.1%	0.7%	2	8.0%	4.9%	5.7%	3.1%
Moderate	1	4.0%	5.6%	2.8%	1.8%	4	16.0%	16.1%	14.0%	9.7%
Middle	19	76.0%	69.0%	59.1%	54.8%	5	20.0%	19.7%	21.0%	17.7%
Upper	5	20.0%	25.4%	36.0%	42.7%	7	28.0%	36.2%	37.4%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	28.0%	23.0%	22.0%	25.0%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	8.0%	8.8%	8.2%	1.9%	2	8.0%	8.8%	8.0%	3.4%
Moderate	0	0.0%	0.0%	5.6%	3.9%	8	32.0%	12.7%	19.4%	13.1%
Middle	18	72.0%	71.9%	57.3%	55.4%	4	16.0%	14.6%	22.7%	21.5%
Upper	5	20.0%	19.3%	28.9%	38.8%	10	40.0%	61.4%	42.8%	57.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.0%	2.5%	7.0%	4.4%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	38.7%	13.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	12.9%	5.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	41.9%	79.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	6.5%	0.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	2.5%	0.4%	3.7%	1.9%	7	8.9%	6.1%	7.9%	4.0%
Moderate	1	1.3%	2.0%	3.8%	2.4%	16	20.3%	13.8%	20.4%	14.7%
Middle	48	60.8%	45.3%	61.6%	59.2%	13	16.5%	15.1%	22.3%	20.6%
Upper	28	35.4%	52.3%	31.0%	36.5%	28	35.4%	42.8%	31.8%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	19.0%	22.2%	17.6%	22.0%
Total	*79*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*79*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	8	6.3%	7.1%	6.8%	6.2%
Moderate	2	1.6%	1.5%	6.4%	8.6%
Middle	76	59.4%	58.5%	56.4%	54.5%
Upper	42	32.8%	32.9%	30.5%	30.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*128*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*60*	46.9%	20.9%	46.6%	29.1%
	By Loan Size				
$100,000 or less	61	47.7%	9.1%	89.1%	26.5%
$100,001-$250,000	26	20.3%	13.1%	5.4%	17.3%
$250,001-$1 Million	41	32.0%	77.8%	5.6%	56.2%
Total	*128*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Reading, PA (MSA 39740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	6.7%	2.4%	3.6%	1.4%	6	13.3%	9.0%	8.3%	4.3%
Moderate	7	15.6%	11.7%	4.8%	2.8%	15	33.3%	29.8%	23.9%	18.4%
Middle	27	60.0%	64.8%	61.1%	57.2%	11	24.4%	28.7%	22.5%	22.9%
Upper	8	17.8%	21.1%	30.6%	38.7%	8	17.8%	19.9%	26.8%	36.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	11.1%	12.5%	18.5%	17.6%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	2.3%	0.8%	2	6.9%	3.8%	5.2%	2.8%
Moderate	2	6.9%	3.0%	3.6%	2.3%	4	13.8%	10.9%	14.1%	10.0%
Middle	22	75.9%	64.7%	60.2%	56.6%	7	24.1%	18.2%	20.1%	17.7%
Upper	5	17.2%	32.2%	33.9%	40.3%	5	17.2%	29.6%	36.8%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	37.9%	37.6%	23.8%	25.7%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	3.8%	2.4%	7.6%	1.5%	8	30.8%	27.1%	10.5%	3.4%
Moderate	1	3.8%	4.1%	5.2%	3.4%	5	19.2%	16.5%	16.9%	11.9%
Middle	17	65.4%	56.5%	54.8%	56.3%	7	26.9%	21.8%	22.7%	20.4%
Upper	7	26.9%	37.1%	32.3%	38.9%	6	23.1%	34.7%	45.5%	58.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.5%	6.0%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	16.3%	2.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	7.0%	3.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	67.4%	89.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	9.3%	5.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	4.0%	1.3%	3.4%	1.2%	16	16.0%	6.9%	7.3%	3.6%
Moderate	10	10.0%	7.5%	4.4%	2.6%	24	24.0%	20.8%	19.8%	14.8%
Middle	66	66.0%	64.6%	60.4%	57.5%	25	25.0%	23.7%	21.6%	20.5%
Upper	20	20.0%	26.6%	31.8%	38.7%	19	19.0%	24.7%	31.4%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	16.0%	24.0%	19.9%	21.9%
Total	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*100*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	10	6.5%	7.8%	7.0%	6.6%
Moderate	13	8.5%	5.3%	7.2%	8.2%
Middle	101	66.0%	63.2%	55.7%	55.8%
Upper	29	19.0%	23.8%	28.1%	28.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.1%	0.5%
Total	*153*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*92*	60.1%	29.6%	48.9%	33.3%
	By Loan Size				
$100,000 or less	82	53.6%	11.2%	89.1%	27.3%
$100,001-$250,000	28	18.3%	15.0%	5.1%	16.5%
$250,001-$1 Million	43	28.1%	73.8%	5.8%	56.2%
Total	*153*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Reading, PA (MSA 39740)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	5	8.2%	4.5%	4.4%	1.6%	5	8.2%	4.8%	9.1%	4.4%
Moderate	5	8.2%	7.2%	5.3%	3.0%	11	18.0%	15.5%	22.1%	17.0%
Middle	38	62.3%	59.2%	61.1%	58.6%	14	23.0%	26.2%	22.7%	23.0%
Upper	13	21.3%	29.0%	29.2%	36.9%	11	18.0%	22.2%	27.5%	37.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	32.8%	31.3%	18.5%	18.0%
Total	*61*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*61*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	3.1%	1.6%	2.8%	1.2%	4	12.5%	9.9%	6.8%	3.9%
Moderate	3	9.4%	5.9%	3.3%	2.3%	2	6.3%	7.4%	16.2%	12.0%
Middle	25	78.1%	75.2%	61.6%	57.6%	7	21.9%	19.3%	22.8%	20.7%
Upper	3	9.4%	17.3%	32.3%	38.9%	8	25.0%	33.7%	35.3%	42.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	34.4%	29.7%	19.0%	21.4%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	9	24.3%	7.7%	11.3%	3.5%	9	24.3%	5.8%	12.0%	3.8%
Moderate	2	5.4%	0.8%	6.2%	3.8%	13	35.1%	11.1%	20.9%	14.4%
Middle	22	59.5%	38.9%	57.5%	59.3%	6	16.2%	6.5%	23.6%	23.1%
Upper	4	10.8%	52.6%	25.0%	33.4%	8	21.6%	57.5%	38.8%	53.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.7%	19.1%	4.7%	5.4%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	30.8%	20.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	10.3%	15.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	53.8%	61.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	5.1%	2.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	15	11.5%	3.7%	4.5%	2.1%	18	13.8%	6.6%	8.5%	4.1%
Moderate	10	7.7%	6.4%	4.7%	3.1%	26	20.0%	12.5%	19.9%	14.7%
Middle	85	65.4%	63.6%	61.0%	58.4%	27	20.8%	22.7%	22.7%	21.6%
Upper	20	15.4%	26.3%	29.8%	36.4%	27	20.8%	28.2%	30.9%	38.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	24.6%	30.0%	18.0%	21.3%
Total	*130*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*130*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	15	10.9%	10.0%	7.4%	8.5%
Moderate	5	3.6%	4.5%	6.3%	8.0%
Middle	81	59.1%	54.5%	54.6%	53.3%
Upper	36	26.3%	31.0%	29.5%	29.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.3%	0.5%
Total	*137*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*76*	55.5%	31.1%	43.9%	31.4%
	By Loan Size				
$100,000 or less	82	59.9%	14.4%	88.9%	25.1%
$100,001-$250,000	20	14.6%	14.4%	5.1%	16.2%
$250,001-$1 Million	35	25.5%	71.1%	6.0%	58.7%
Total	*137*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Bloomsburg-Berwick, PA (MSA 14100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.3%	3.2%
Moderate	2	33.3%	19.2%	21.3%	16.4%	2	33.3%	30.8%	19.8%	14.1%
Middle	3	50.0%	61.2%	60.5%	57.7%	1	16.7%	19.6%	21.7%	20.0%
Upper	1	16.7%	19.6%	18.2%	25.9%	3	50.0%	49.6%	37.8%	50.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.3%	12.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	4	15.4%	7.3%	11.4%	6.2%
Moderate	2	7.7%	10.0%	15.0%	11.7%	5	19.2%	10.3%	16.3%	13.3%
Middle	19	73.1%	64.4%	68.5%	67.0%	7	26.9%	31.3%	23.3%	21.7%
Upper	5	19.2%	25.5%	16.5%	21.4%	8	30.8%	37.1%	37.5%	46.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	7.7%	14.0%	11.4%	12.8%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	7.0%	12.7%	8.5%
Moderate	1	14.3%	7.0%	10.2%	8.5%	1	14.3%	8.5%	11.5%	7.6%
Middle	4	57.1%	50.7%	75.2%	73.7%	2	28.6%	25.4%	19.7%	19.5%
Upper	2	28.6%	42.3%	14.6%	17.7%	2	28.6%	45.1%	51.0%	56.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	14.1%	5.1%	8.1%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	27.3%	10.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	72.7%	89.7%	0	0.0%	0.0%	4.5%	1.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.2%	9.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	77.3%	89.4%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	12.8%	5.4%	8.5%	3.9%
Moderate	5	12.8%	12.1%	18.3%	14.3%	8	20.5%	15.5%	17.6%	12.6%
Middle	26	66.7%	62.2%	64.6%	63.3%	10	25.6%	27.7%	21.8%	19.0%
Upper	8	20.5%	25.7%	17.1%	22.4%	13	33.3%	41.1%	38.7%	46.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	7.7%	10.4%	13.4%	18.0%
Total	*39*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*39*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	19	31.7%	13.7%	14.9%	15.2%
Middle	25	41.7%	30.9%	60.8%	51.2%
Upper	16	26.7%	55.5%	22.6%	33.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.7%	0.5%
Total	*60*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*35*	58.3%	13.2%	46.4%	40.2%
	By Loan Size				
$100,000 or less	48	80.0%	17.2%	94.4%	38.4%
$100,001-$250,000	4	6.7%	10.3%	3.2%	16.1%
$250,001-$1 Million	8	13.3%	72.4%	2.4%	45.5%
Total	*60*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Bloomsburg-Berwick, PA (MSA 14100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	7.2%	5.1%	2.8%
Moderate	3	30.0%	21.6%	16.8%	11.7%	1	10.0%	14.2%	18.8%	13.0%
Middle	6	60.0%	60.3%	64.0%	60.4%	2	20.0%	14.4%	27.1%	23.6%
Upper	1	10.0%	18.1%	19.2%	27.9%	3	30.0%	47.0%	35.9%	48.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	30.0%	17.2%	13.0%	12.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.7%	4.1%
Moderate	0	0.0%	0.0%	10.8%	6.4%	2	40.0%	40.5%	16.2%	10.3%
Middle	2	40.0%	52.8%	68.2%	62.3%	1	20.0%	7.4%	26.2%	22.3%
Upper	3	60.0%	47.2%	21.0%	31.3%	2	40.0%	52.1%	37.2%	50.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.7%	12.4%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	4	19.0%	17.1%	15.7%	4.5%
Moderate	2	9.5%	8.3%	9.8%	10.1%	2	9.5%	5.2%	13.1%	10.9%
Middle	16	76.2%	80.8%	75.1%	72.6%	7	33.3%	30.6%	27.2%	19.9%
Upper	3	14.3%	10.9%	15.1%	17.3%	8	38.1%	47.2%	40.0%	57.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	7.7%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	53.3%	42.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	40.0%	7.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.7%	49.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	13.5%	6.4%	7.7%	3.1%
Moderate	6	16.2%	15.8%	14.2%	11.5%	5	13.5%	19.4%	16.9%	11.6%
Middle	24	64.9%	60.1%	66.9%	59.3%	10	27.0%	14.2%	26.7%	22.0%
Upper	7	18.9%	24.1%	18.9%	29.2%	13	35.1%	47.9%	36.7%	47.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	10.8%	12.1%	12.1%	15.8%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	16.7%	5.7%	16.0%	13.7%
Middle	13	43.3%	32.4%	63.0%	53.8%
Upper	12	40.0%	61.9%	20.3%	31.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.7%	0.7%
Total	*30*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*14*	46.7%	14.9%	49.9%	40.5%
	By Loan Size				
$100,000 or less	16	53.3%	9.0%	94.2%	39.2%
$100,001-$250,000	4	13.3%	8.6%	2.9%	14.4%
$250,001-$1 Million	10	33.3%	82.4%	2.9%	46.4%
Total	*30*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Bloomsburg-Berwick, PA (MSA 14100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.7%	3.3%
Moderate	0	0.0%	0.0%	6.0%	3.5%	4	20.0%	18.5%	16.2%	10.7%
Middle	16	80.0%	79.4%	76.3%	71.3%	8	40.0%	38.0%	25.3%	22.3%
Upper	4	20.0%	20.6%	17.7%	25.3%	4	20.0%	33.4%	38.7%	51.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	20.0%	10.1%	13.1%	12.0%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	39.4%	8.7%	5.3%
Moderate	0	0.0%	0.0%	4.5%	2.8%	1	25.0%	38.1%	13.8%	10.3%
Middle	4	100.0%	100.0%	77.3%	72.5%	0	0.0%	0.0%	23.4%	20.7%
Upper	0	0.0%	0.0%	18.0%	24.6%	1	25.0%	22.5%	37.2%	45.1%
Unknown	0	0.0%	0.0%	0.2%	0.1%	0	0.0%	0.0%	16.8%	18.5%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.3%	5.6%
Moderate	2	15.4%	5.9%	4.5%	2.5%	3	23.1%	14.5%	17.4%	10.1%
Middle	11	84.6%	94.1%	81.0%	85.5%	4	30.8%	16.7%	26.6%	24.6%
Upper	0	0.0%	0.0%	14.6%	11.9%	4	30.8%	17.2%	40.1%	53.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	15.4%	51.6%	3.6%	6.3%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	5.3%	5.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	94.7%	94.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	2	5.4%	5.2%	8.4%	4.1%
Moderate	2	5.4%	0.3%	5.2%	3.2%	8	21.6%	20.9%	15.4%	10.1%
Middle	31	83.8%	82.9%	77.7%	73.5%	12	32.4%	31.7%	24.6%	21.1%
Upper	4	10.8%	16.7%	17.0%	23.2%	9	24.3%	31.0%	38.1%	47.7%
Unknown	0	0.0%	0.0%	0.1%	0.0%	6	16.2%	11.1%	13.5%	17.1%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	22.9%	23.6%	9.1%	15.8%
Middle	16	45.7%	44.5%	67.7%	59.1%
Upper	11	31.4%	32.0%	23.0%	25.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.2%	0.1%
Total	*35*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*17*	48.6%	28.2%	46.3%	38.7%
	By Loan Size				
$100,000 or less	18	51.4%	8.9%	93.3%	36.3%
$100,001-$250,000	6	17.1%	16.1%	3.5%	18.0%
$250,001-$1 Million	11	31.4%	74.9%	3.2%	45.7%
Total	*35*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Bloomsburg-Berwick, PA (MSA 14100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	15.3%	6.5%	3.8%
Moderate	2	12.5%	7.1%	5.1%	3.1%	2	12.5%	16.8%	18.9%	13.3%
Middle	11	68.8%	78.9%	75.9%	69.6%	3	18.8%	16.5%	25.8%	22.7%
Upper	3	18.8%	13.9%	18.9%	27.3%	5	31.3%	37.5%	37.3%	50.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	13.9%	11.5%	9.9%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.1%	3.1%
Moderate	1	16.7%	6.5%	5.5%	3.6%	2	33.3%	37.9%	14.2%	10.7%
Middle	5	83.3%	93.5%	72.4%	66.7%	0	0.0%	0.0%	20.8%	17.4%
Upper	0	0.0%	0.0%	22.0%	29.7%	1	16.7%	29.8%	44.1%	53.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	32.3%	14.8%	15.5%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	38.5%	21.6%	11.9%	5.5%
Moderate	3	23.1%	12.6%	8.3%	4.0%	2	15.4%	21.6%	21.1%	14.2%
Middle	6	46.2%	59.5%	79.2%	79.1%	1	7.7%	6.3%	22.7%	18.8%
Upper	4	30.8%	27.9%	12.5%	16.8%	5	38.5%	50.5%	41.0%	55.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.3%	6.5%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	8.3%	0.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	83.3%	72.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	8.3%	27.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	8	22.9%	10.6%	7.4%	3.5%
Moderate	6	17.1%	7.1%	5.9%	3.2%	6	17.1%	23.8%	17.6%	11.9%
Middle	22	62.9%	83.0%	75.4%	69.3%	4	11.4%	10.8%	23.3%	19.6%
Upper	7	20.0%	9.9%	18.7%	27.5%	11	31.4%	35.4%	40.1%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	17.1%	19.4%	11.6%	15.2%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	12.9%	16.4%	8.3%	11.2%
Middle	15	48.4%	42.0%	68.2%	60.5%
Upper	12	38.7%	41.5%	21.7%	27.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.8%	0.7%
Total	*31*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*17*	54.8%	11.7%	46.0%	37.5%
	By Loan Size				
$100,000 or less	18	58.1%	10.6%	93.1%	35.5%
$100,001-$250,000	6	19.4%	16.4%	3.8%	17.7%
$250,001-$1 Million	7	22.6%	73.0%	3.1%	46.8%
Total	*31*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Bloomsburg-Berwick, PA (MSA 14100)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	3.3%
Moderate	2	16.7%	12.2%	7.6%	4.5%	2	16.7%	12.2%	16.9%	11.3%
Middle	8	66.7%	76.7%	72.9%	67.4%	2	16.7%	18.5%	26.8%	24.6%
Upper	2	16.7%	11.1%	19.5%	28.0%	5	41.7%	45.7%	37.9%	50.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	25.0%	23.6%	12.0%	10.2%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.5%	3.9%
Moderate	1	11.1%	16.8%	7.2%	4.7%	1	11.1%	8.9%	16.9%	12.2%
Middle	7	77.8%	65.9%	73.9%	68.5%	2	22.2%	28.7%	23.8%	19.6%
Upper	1	11.1%	17.3%	18.9%	26.8%	4	44.4%	49.5%	39.7%	51.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	12.8%	12.1%	13.3%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	33.3%	8.6%	12.2%	5.2%
Moderate	1	6.7%	2.7%	6.5%	7.0%	7	46.7%	20.9%	21.2%	14.1%
Middle	11	73.3%	90.4%	75.0%	70.9%	2	13.3%	3.7%	23.4%	23.4%
Upper	3	20.0%	7.0%	18.5%	22.1%	0	0.0%	0.0%	41.0%	54.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	6.7%	66.8%	2.2%	2.7%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	13.9%	0.5%	7.9%	3.7%
Moderate	4	11.1%	13.6%	7.2%	4.7%	10	27.8%	11.3%	17.7%	11.7%
Middle	26	72.2%	73.0%	73.8%	68.4%	6	16.7%	21.9%	25.0%	22.5%
Upper	6	16.7%	13.5%	19.0%	26.8%	9	25.0%	44.6%	39.0%	50.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	16.7%	21.7%	10.5%	11.6%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	11.3%	11.7%	9.4%	15.0%
Middle	24	45.3%	29.3%	69.8%	50.7%
Upper	23	43.4%	59.0%	18.3%	33.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.5%	0.6%
Total	*53*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*26*	49.1%	18.0%	45.0%	34.3%
	By Loan Size				
$100,000 or less	29	54.7%	10.1%	90.6%	26.7%
$100,001-$250,000	3	5.7%	3.7%	4.2%	13.3%
$250,001-$1 Million	21	39.6%	86.2%	5.2%	59.9%
Total	*53*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Chambersburg-Waynesboro, PA (MSA 16540)

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	2.9%	3.2%	2.7%	2.5%	2	5.7%	2.8%	6.9%	4.6%
Moderate	2	5.7%	4.5%	8.0%	6.4%	7	20.0%	12.5%	24.2%	19.7%
Middle	28	80.0%	83.2%	78.6%	79.3%	9	25.7%	23.9%	24.5%	24.4%
Upper	4	11.4%	9.0%	10.7%	11.8%	16	45.7%	57.3%	27.4%	34.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.9%	3.5%	17.1%	17.0%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	2.4%	2.9%	2.0%	2.5%	24	14.1%	9.9%	10.3%	6.2%
Moderate	10	5.9%	3.9%	7.0%	5.8%	55	32.4%	29.2%	22.9%	18.1%
Middle	143	84.1%	85.5%	81.1%	81.3%	38	22.4%	24.7%	22.9%	21.8%
Upper	13	7.6%	7.8%	9.9%	10.3%	51	30.0%	35.5%	33.3%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.2%	0.7%	10.6%	13.5%
Total	*170*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*170*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.4%	1.7%	8	20.0%	21.6%	8.5%	7.3%
Moderate	4	10.0%	18.4%	5.8%	6.5%	11	27.5%	21.0%	21.2%	15.2%
Middle	34	85.0%	78.6%	81.5%	80.6%	13	32.5%	34.6%	26.7%	27.4%
Upper	2	5.0%	3.1%	10.3%	11.1%	6	15.0%	16.2%	37.9%	40.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.0%	6.6%	5.8%	9.4%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	28.6%	46.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	7.1%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	64.3%	52.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	5	2.0%	2.7%	2.5%	3.1%	34	13.9%	9.2%	8.1%	5.0%
Moderate	16	6.5%	5.3%	7.5%	6.2%	73	29.8%	24.4%	23.5%	18.9%
Middle	205	83.7%	84.3%	79.6%	79.5%	60	24.5%	25.4%	24.1%	23.4%
Upper	19	7.8%	7.7%	10.4%	11.2%	73	29.8%	39.2%	29.9%	35.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	2.0%	1.9%	14.5%	17.1%
Total	*245*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*245*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	2.1%	0.7%	4.0%	5.2%
Moderate	9	9.5%	2.4%	6.1%	4.4%
Middle	82	86.3%	96.0%	82.0%	85.9%
Upper	2	2.1%	0.9%	7.1%	4.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.9%	0.3%
Total	*95*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*60*	63.2%	41.6%	45.9%	37.7%
	By Loan Size				
$100,000 or less	74	77.9%	20.8%	91.8%	31.9%
$100,001-$250,000	8	8.4%	10.7%	4.1%	16.5%
$250,001-$1 Million	13	13.7%	68.5%	4.1%	51.6%
Total	*95*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Chambersburg-Waynesboro, PA (MSA 16540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.7%	1.8%	2	4.4%	2.3%	4.5%	2.1%
Moderate	3	6.7%	5.9%	8.4%	5.5%	5	11.1%	9.4%	21.2%	14.0%
Middle	39	86.7%	85.2%	76.6%	80.9%	10	22.2%	17.3%	24.1%	19.5%
Upper	3	6.7%	9.0%	12.3%	11.8%	17	37.8%	51.7%	29.1%	47.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	24.4%	19.3%	21.1%	16.7%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	2.4%	0.8%	2.5%	4.8%	7	16.7%	4.0%	5.0%	2.7%
Moderate	3	7.1%	2.6%	6.6%	5.2%	8	19.0%	5.0%	15.4%	10.0%
Middle	35	83.3%	94.2%	79.9%	78.9%	8	19.0%	7.6%	21.4%	17.5%
Upper	3	7.1%	2.3%	11.0%	11.0%	15	35.7%	16.2%	35.4%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	9.5%	67.1%	22.8%	31.1%
Total	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.7%	1.3%	7	18.4%	14.2%	12.5%	2.9%
Moderate	4	10.5%	5.9%	7.6%	3.1%	11	28.9%	24.7%	23.4%	15.0%
Middle	30	78.9%	82.0%	80.5%	85.2%	11	28.9%	34.0%	26.4%	23.0%
Upper	4	10.5%	12.1%	9.2%	10.3%	8	21.1%	25.8%	35.2%	54.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.6%	1.3%	2.5%	4.5%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.0%	27.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.0%	5.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	65.0%	65.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	5.0%	1.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	0.8%	0.5%	2.6%	3.1%	16	12.6%	3.5%	5.5%	2.2%
Moderate	10	7.9%	3.7%	7.9%	5.4%	24	18.9%	6.8%	19.7%	12.7%
Middle	106	83.5%	91.0%	77.9%	80.2%	29	22.8%	11.3%	23.5%	18.6%
Upper	10	7.9%	4.8%	11.6%	11.3%	40	31.5%	28.2%	31.4%	44.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	14.2%	50.2%	19.9%	21.9%
Total	*127*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*127*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	1.7%	0.4%	3.8%	2.5%
Moderate	1	1.7%	0.4%	6.5%	7.4%
Middle	51	86.4%	92.5%	80.7%	80.4%
Upper	6	10.2%	6.7%	7.8%	9.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.1%	0.4%
Total	*59*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*39*	66.1%	59.9%	47.7%	47.7%
	By Loan Size				
$100,000 or less	26	44.1%	11.6%	90.8%	29.6%
$100,001-$250,000	19	32.2%	27.5%	4.7%	19.5%
$250,001-$1 Million	14	23.7%	60.9%	4.5%	51.0%
Total	*59*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

ssessment Area: Chambersburg-Waynesboro, PA (MSA 16540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.0%	4.4%
Moderate	4	8.0%	6.5%	11.2%	8.5%	13	26.0%	21.6%	23.4%	19.2%
Middle	41	82.0%	81.6%	77.5%	78.8%	13	26.0%	26.9%	23.6%	23.7%
Upper	5	10.0%	11.9%	11.4%	12.6%	10	20.0%	27.4%	22.1%	29.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	28.0%	24.1%	23.9%	23.0%
Total	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*50*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	3	5.8%	2.8%	6.1%	3.5%
Moderate	1	1.9%	1.7%	7.3%	5.4%	9	17.3%	16.3%	17.3%	13.2%
Middle	43	82.7%	82.7%	83.9%	84.6%	10	19.2%	18.0%	18.4%	16.3%
Upper	8	15.4%	15.6%	8.8%	9.9%	19	36.5%	44.3%	29.6%	35.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	21.2%	18.7%	28.5%	31.9%
Total	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*52*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	13.9%	7.7%	13.2%	3.8%
Moderate	5	13.9%	11.7%	8.3%	5.3%	12	33.3%	30.5%	26.6%	18.0%
Middle	30	83.3%	86.9%	82.9%	86.3%	8	22.2%	18.8%	28.0%	30.8%
Upper	1	2.8%	1.3%	8.8%	8.4%	9	25.0%	38.3%	29.6%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.6%	4.7%	2.5%	7.1%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	42.9%	35.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	57.1%	64.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	8	5.7%	1.5%	7.2%	3.9%
Moderate	10	7.1%	4.0%	9.6%	7.7%	34	24.3%	18.3%	21.4%	16.6%
Middle	116	82.9%	83.0%	80.2%	81.0%	31	22.1%	21.3%	22.1%	20.7%
Upper	14	10.0%	13.0%	10.2%	11.3%	38	27.1%	34.6%	25.5%	31.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	29	20.7%	24.4%	23.8%	27.2%
Total	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*140*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	9.0%	7.6%	9.0%	7.0%
Middle	58	74.4%	68.1%	82.7%	82.1%
Upper	13	16.7%	24.3%	8.3%	10.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*78*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*48*	61.5%	37.7%	47.6%	48.1%
	By Loan Size				
$100,000 or less	44	56.4%	10.6%	90.8%	30.5%
$100,001-$250,000	11	14.1%	11.0%	5.1%	19.8%
$250,001-$1 Million	23	29.5%	78.4%	4.1%	49.7%
Total	*78*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

ssessment Area: Chambersburg-Waynesboro, PA (MSA 16540)

Income Categories	HMDA By Tract Income: Bank #	Bank %	Bank % $(000s)	Aggregate %	Aggregate % $(000s)	HMDA By Borrower Income: Bank #	Bank %	Bank % $(000s)	Aggregate %	Aggregate % $(000s)
					Home Purchase					
Low	0	0.0%	0.0%	0.0%	0.0%	3	5.9%	3.3%	6.0%	3.3%
Moderate	7	13.7%	11.2%	9.5%	6.8%	13	25.5%	26.3%	22.6%	18.1%
Middle	39	76.5%	77.8%	78.9%	80.1%	11	21.6%	22.7%	20.7%	20.3%
Upper	5	9.8%	11.0%	11.6%	13.1%	12	23.5%	31.6%	28.0%	37.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	23.5%	16.1%	22.8%	21.4%
Total	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
					Refinance					
Low	0	0.0%	0.0%	0.0%	0.0%	2	5.7%	4.7%	6.1%	4.0%
Moderate	3	8.6%	5.6%	6.6%	5.2%	3	8.6%	5.3%	15.9%	11.4%
Middle	28	80.0%	82.9%	83.6%	84.3%	4	11.4%	10.8%	20.1%	17.5%
Upper	4	11.4%	11.5%	9.8%	10.6%	14	40.0%	44.1%	33.9%	40.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	34.3%	35.1%	23.9%	26.9%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
					Home Improvement					
Low	0	0.0%	0.0%	0.0%	0.0%	10	35.7%	27.9%	16.4%	7.2%
Moderate	1	3.6%	4.6%	6.2%	3.6%	8	28.6%	25.6%	21.4%	13.1%
Middle	24	85.7%	84.5%	85.6%	87.9%	5	17.9%	16.0%	23.0%	20.9%
Upper	3	10.7%	11.0%	8.2%	8.5%	5	17.9%	30.6%	37.6%	52.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.6%	6.8%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
					Multi-Family					
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	42.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	57.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
					HMDA Totals					
Low	0	0.0%	0.0%	0.0%	0.0%	15	13.2%	4.4%	7.1%	3.6%
Moderate	11	9.6%	8.7%	8.3%	6.6%	24	21.1%	17.2%	20.0%	15.2%
Middle	91	79.8%	80.1%	81.2%	81.6%	20	17.5%	17.4%	20.6%	19.0%
Upper	12	10.5%	11.2%	10.5%	11.8%	31	27.2%	37.0%	31.0%	38.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	21.1%	24.1%	21.2%	24.2%
Total	*114*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*114*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income: Bank #	Bank %	Bank % $(000s)	Aggregate %	Aggregate % $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	6.6%	6.1%	9.5%	9.5%
Middle	65	85.5%	89.3%	81.1%	80.9%
Upper	6	7.9%	4.6%	7.5%	9.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.9%	0.4%
Total	*76*	100.0%	100.0%	100.0%	100.0%
			By Revenue		
$1 Million or Less	*37*	48.7%	30.3%	44.2%	41.5%
			By Loan Size		
$100,000 or less	33	43.4%	8.3%	89.7%	31.0%
$100,001-$250,000	18	23.7%	16.5%	5.7%	19.1%
$250,001-$1 Million	25	32.9%	75.1%	4.6%	49.8%
Total	*76*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Chambersburg-Waynesboro, PA (MSA 16540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	3	3.4%	1.2%	5.5%	3.2%
Moderate	8	9.2%	16.7%	7.6%	6.8%	21	24.1%	17.9%	21.0%	16.1%
Middle	68	78.2%	70.2%	82.9%	82.4%	20	23.0%	21.2%	22.5%	22.0%
Upper	11	12.6%	13.1%	9.5%	10.8%	28	32.2%	37.1%	31.0%	39.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	15	17.2%	22.7%	20.1%	19.6%
Total	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*87*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.9%	3.6%
Moderate	4	10.5%	8.5%	7.7%	7.3%	8	21.1%	18.9%	15.0%	11.4%
Middle	27	71.1%	72.0%	83.1%	82.6%	10	26.3%	21.5%	21.3%	18.5%
Upper	7	18.4%	19.4%	9.2%	10.1%	14	36.8%	46.0%	36.7%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	15.8%	13.6%	21.1%	24.5%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	6	17.1%	9.5%	7.7%	2.9%
Moderate	5	14.3%	13.1%	7.3%	4.0%	7	20.0%	17.5%	26.2%	19.4%
Middle	28	80.0%	83.6%	84.7%	89.4%	11	31.4%	28.4%	23.2%	20.5%
Upper	2	5.7%	3.3%	7.9%	6.5%	11	31.4%	44.7%	40.7%	52.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	4.9%
Total	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.2%	21.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	100.0%	81.8%	79.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	9	5.5%	0.9%	5.9%	3.2%
Moderate	17	10.4%	13.7%	7.7%	7.1%	36	22.0%	17.1%	19.5%	14.3%
Middle	127	77.4%	72.5%	83.2%	82.7%	41	25.0%	20.2%	22.0%	20.3%
Upper	20	12.2%	13.8%	9.1%	10.2%	53	32.3%	37.3%	34.1%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	15.2%	24.4%	18.5%	22.2%
Total	*164*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*164*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	8.8%	14.0%	8.7%	8.6%
Middle	68	85.0%	85.0%	82.1%	82.8%
Upper	5	6.3%	1.0%	6.8%	8.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.4%	0.3%
Total	*80*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*48*	60.0%	43.8%	41.8%	52.7%
	By Loan Size				
$100,000 or less	34	42.5%	7.8%	88.8%	25.6%
$100,001-$250,000	16	20.0%	12.5%	5.1%	16.4%
$250,001-$1 Million	30	37.5%	79.7%	6.1%	58.1%
Total	*80*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: East Stroudsburg, PA (MSA 20700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.8%	3.6%
Moderate	3	30.0%	38.4%	8.8%	9.5%	3	30.0%	26.8%	19.6%	16.0%
Middle	7	70.0%	61.6%	87.3%	85.5%	2	20.0%	9.9%	24.4%	24.5%
Upper	0	0.0%	0.0%	3.9%	5.0%	4	40.0%	48.6%	32.7%	38.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	14.7%	17.5%	17.5%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	5.0%	9.8%	6.4%
Moderate	1	14.3%	17.6%	8.5%	8.3%	0	0.0%	0.0%	18.7%	15.5%
Middle	5	71.4%	77.4%	86.4%	86.1%	0	0.0%	0.0%	23.9%	22.5%
Upper	1	14.3%	5.0%	5.1%	5.6%	6	85.7%	95.0%	36.5%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.2%	12.6%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.4%	4.7%
Moderate	1	16.7%	7.2%	9.5%	10.3%	2	33.3%	19.2%	18.3%	14.6%
Middle	3	50.0%	23.7%	85.9%	81.0%	0	0.0%	0.0%	26.6%	20.9%
Upper	2	33.3%	69.1%	4.6%	8.8%	4	66.7%	80.8%	40.3%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.5%	10.1%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	10.0%	5.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	90.0%	94.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.0%	3.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	90.0%	96.2%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.3%	1.3%	6.9%	4.1%
Moderate	5	21.7%	27.8%	8.8%	9.2%	5	21.7%	18.6%	19.2%	15.7%
Middle	15	65.2%	59.3%	87.0%	85.7%	2	8.7%	5.7%	24.4%	23.7%
Upper	3	13.0%	12.9%	4.2%	5.2%	14	60.9%	66.0%	34.0%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	4.3%	8.4%	15.5%	17.3%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	33.3%	22.7%	15.7%	13.6%
Middle	13	54.2%	73.5%	75.3%	78.2%
Upper	3	12.5%	3.8%	6.8%	7.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.2%	1.1%
Total	*24*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*9*	37.5%	8.5%	45.6%	37.1%
	By Loan Size				
$100,000 or less	18	75.0%	14.6%	94.6%	41.1%
$100,001-$250,000	2	8.3%	13.0%	3.1%	17.1%
$250,001-$1 Million	4	16.7%	72.3%	2.3%	41.8%
Total	*24*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: East Stroudsburg, PA (MSA 20700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.3%	2.3%	6.3%	3.8%
Moderate	2	8.7%	11.4%	9.4%	9.1%	1	4.3%	4.9%	20.3%	17.0%
Middle	21	91.3%	88.6%	86.7%	86.0%	7	30.4%	35.7%	21.8%	22.7%
Upper	0	0.0%	0.0%	3.9%	4.8%	7	30.4%	36.0%	31.0%	36.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	30.4%	21.0%	20.5%	20.5%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.0%	5.6%
Moderate	3	30.0%	29.4%	7.9%	8.2%	1	10.0%	12.6%	15.0%	11.8%
Middle	7	70.0%	70.6%	86.7%	85.4%	3	30.0%	22.4%	21.6%	19.2%
Upper	0	0.0%	0.0%	5.5%	6.3%	3	30.0%	32.9%	29.3%	34.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	30.0%	32.0%	25.1%	28.6%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	31.3%	9.3%	5.2%
Moderate	0	0.0%	0.0%	5.6%	6.6%	0	0.0%	0.0%	24.2%	20.3%
Middle	3	100.0%	100.0%	87.7%	85.8%	1	33.3%	37.5%	24.5%	21.4%
Upper	0	0.0%	0.0%	6.6%	7.6%	1	33.3%	31.3%	37.7%	46.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.3%	6.1%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	62.5%	84.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	25.0%	8.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	12.5%	6.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	2	5.3%	0.4%	7.2%	4.0%
Moderate	7	18.4%	82.5%	9.0%	14.1%	2	5.3%	1.5%	19.1%	14.6%
Middle	31	81.6%	17.5%	86.6%	80.5%	11	28.9%	6.7%	21.9%	20.3%
Upper	0	0.0%	0.0%	4.5%	5.4%	11	28.9%	7.4%	30.9%	33.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	31.6%	84.1%	20.9%	27.6%
Total	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	20.0%	18.0%	16.6%	21.0%
Middle	10	66.7%	50.5%	73.8%	69.2%
Upper	2	13.3%	31.5%	6.5%	8.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.1%	1.5%
Total	*15*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	40.0%	9.6%	49.9%	41.5%
	By Loan Size				
$100,000 or less	5	33.3%	3.5%	95.2%	46.8%
$100,001-$250,000	1	6.7%	3.5%	2.4%	13.1%
$250,001-$1 Million	9	60.0%	93.0%	2.3%	40.0%
Total	*15*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: East Stroudsburg, PA (MSA 20700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.4%	1.5%	3.7%	1.9%
Moderate	0	0.0%	0.0%	6.8%	5.1%	3	10.3%	6.2%	16.0%	11.9%
Middle	26	89.7%	84.0%	74.6%	75.0%	6	20.7%	23.1%	24.0%	23.2%
Upper	3	10.3%	16.0%	18.6%	19.9%	13	44.8%	52.6%	37.4%	44.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	20.7%	16.7%	18.9%	19.1%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.1%	2.2%
Moderate	0	0.0%	0.0%	6.4%	5.3%	0	0.0%	0.0%	11.2%	8.2%
Middle	5	62.5%	68.4%	75.8%	74.8%	0	0.0%	0.0%	17.1%	14.3%
Upper	3	37.5%	31.6%	17.8%	19.9%	0	0.0%	0.0%	35.1%	38.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	100.0%	100.0%	32.5%	37.3%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.0%	1.9%
Moderate	0	0.0%	0.0%	3.7%	2.4%	0	0.0%	0.0%	12.4%	8.3%
Middle	0	0.0%	0.0%	75.5%	75.7%	0	0.0%	0.0%	26.0%	19.2%
Upper	0	0.0%	0.0%	20.7%	21.9%	0	0.0%	0.0%	49.8%	60.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.8%	10.4%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	75.0%	54.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	45.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.7%	1.2%	3.9%	2.0%
Moderate	0	0.0%	0.0%	6.4%	5.0%	3	8.1%	5.1%	14.2%	10.4%
Middle	31	83.8%	81.2%	75.0%	74.7%	6	16.2%	18.9%	21.8%	19.8%
Upper	6	16.2%	18.8%	18.5%	20.3%	13	35.1%	43.1%	37.4%	41.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	37.8%	31.7%	22.7%	26.0%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	2.9%	3.8%
Middle	13	81.3%	94.0%	82.5%	82.5%
Upper	3	18.8%	6.0%	14.6%	13.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*16*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*8*	50.0%	31.1%	52.7%	51.8%
	By Loan Size				
$100,000 or less	9	56.3%	20.2%	95.4%	46.2%
$100,001-$250,000	3	18.8%	18.6%	2.7%	15.7%
$250,001-$1 Million	4	25.0%	61.1%	2.0%	38.1%
Total	*16*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: East Stroudsburg, PA (MSA 20700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	6.7%	2.9%	6.1%	3.5%
Moderate	2	13.3%	12.7%	6.4%	5.0%	3	20.0%	16.2%	20.8%	16.2%
Middle	10	66.7%	70.9%	76.8%	77.3%	5	33.3%	32.4%	23.3%	23.0%
Upper	3	20.0%	16.4%	16.7%	17.7%	5	33.3%	43.1%	32.2%	38.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	6.7%	5.4%	17.7%	19.1%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.4%	4.5%
Moderate	0	0.0%	0.0%	5.5%	4.9%	2	20.0%	23.6%	13.7%	10.1%
Middle	8	80.0%	84.1%	77.3%	76.6%	3	30.0%	24.8%	19.1%	18.0%
Upper	2	20.0%	15.9%	17.3%	18.5%	1	10.0%	14.7%	30.5%	33.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	40.0%	36.9%	29.3%	33.5%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.8%	4.1%
Moderate	0	0.0%	0.0%	4.9%	3.6%	3	75.0%	57.1%	19.1%	12.8%
Middle	2	50.0%	62.9%	78.4%	83.0%	0	0.0%	0.0%	22.3%	20.5%
Upper	2	50.0%	37.1%	16.6%	13.4%	1	25.0%	42.9%	46.3%	54.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	7.7%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	75.0%	91.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	8.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.4%	1.6%	6.8%	3.9%
Moderate	2	6.9%	7.1%	6.0%	4.8%	8	27.6%	19.8%	17.9%	13.4%
Middle	20	69.0%	76.6%	77.1%	77.5%	8	27.6%	28.8%	21.6%	20.5%
Upper	7	24.1%	16.4%	16.9%	17.7%	7	24.1%	30.8%	32.4%	36.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	17.2%	19.0%	21.3%	26.1%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	2.9%	2.8%
Middle	19	70.4%	67.3%	77.7%	81.6%
Upper	8	29.6%	32.7%	14.4%	13.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	5.0%	2.3%
Total	*27*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*12*	44.4%	26.5%	52.8%	46.2%
	By Loan Size				
$100,000 or less	14	51.9%	13.2%	94.9%	46.7%
$100,001-$250,000	7	25.9%	24.8%	2.9%	15.3%
$250,001-$1 Million	6	22.2%	62.0%	2.2%	38.0%
Total	*27*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: East Stroudsburg, PA (MSA 20700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.2%	1.5%
Moderate	0	0.0%	0.0%	5.6%	4.4%	1	11.1%	9.2%	14.8%	10.8%
Middle	8	88.9%	81.3%	77.0%	77.7%	1	11.1%	4.1%	25.9%	24.5%
Upper	1	11.1%	18.7%	17.4%	18.0%	0	0.0%	0.0%	36.3%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	77.8%	86.7%	19.7%	21.1%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.7%	3.7%
Moderate	0	0.0%	0.0%	5.1%	4.4%	0	0.0%	0.0%	12.6%	9.5%
Middle	10	90.9%	92.3%	77.1%	76.6%	1	9.1%	5.1%	21.7%	18.8%
Upper	1	9.1%	7.7%	17.8%	18.9%	3	27.3%	23.8%	38.9%	43.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	63.6%	71.1%	21.0%	24.8%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	10.4%	7.1%	3.8%
Moderate	0	0.0%	0.0%	4.6%	3.0%	2	28.6%	37.5%	16.8%	11.3%
Middle	4	57.1%	52.1%	76.1%	71.8%	0	0.0%	0.0%	22.5%	16.1%
Upper	3	42.9%	47.9%	19.3%	25.2%	4	57.1%	52.1%	50.7%	58.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	10.0%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	3.7%	0.1%	4.4%	2.4%
Moderate	0	0.0%	0.0%	5.4%	4.3%	3	11.1%	4.4%	14.1%	10.2%
Middle	22	81.5%	87.1%	77.0%	77.3%	2	7.4%	4.6%	24.1%	22.0%
Upper	5	18.5%	12.9%	17.6%	18.4%	7	25.9%	14.2%	38.3%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	14	51.9%	76.7%	19.1%	22.7%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	2.6%	3.4%
Middle	9	69.2%	79.4%	74.6%	80.9%
Upper	4	30.8%	20.6%	13.2%	13.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	9.6%	2.5%
Total	*13*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*4*	30.8%	5.8%	48.3%	44.1%
	By Loan Size				
$100,000 or less	6	46.2%	11.4%	94.8%	47.1%
$100,001-$250,000	1	7.7%	7.0%	2.6%	13.5%
$250,001-$1 Million	6	46.2%	81.6%	2.6%	39.4%
Total	*13*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Gettysburg, PA (MSA 23900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	11.1%	8.3%	7.4%	4.5%
Moderate	0	0.0%	0.0%	3.5%	2.8%	3	16.7%	14.1%	21.3%	16.7%
Middle	16	88.9%	92.1%	83.7%	82.0%	4	22.2%	17.7%	22.9%	22.2%
Upper	2	11.1%	7.9%	12.7%	15.2%	8	44.4%	55.8%	30.0%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	4.1%	18.5%	17.8%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	8	19.5%	16.8%	9.9%	5.8%
Moderate	0	0.0%	0.0%	1.7%	1.7%	9	22.0%	18.2%	22.1%	18.7%
Middle	35	85.4%	81.2%	82.2%	79.2%	15	36.6%	35.5%	25.5%	23.9%
Upper	6	14.6%	18.8%	16.1%	19.2%	6	14.6%	16.9%	32.2%	39.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	7.3%	12.7%	10.3%	12.5%
Total	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	12.5%	10.7%	7.6%	6.3%
Moderate	0	0.0%	0.0%	5.1%	8.8%	3	18.8%	17.9%	15.7%	12.6%
Middle	10	62.5%	74.7%	76.3%	73.5%	6	37.5%	50.3%	28.0%	29.3%
Upper	6	37.5%	25.3%	18.6%	17.6%	5	31.3%	21.1%	44.5%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	7.2%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.2%	7.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	81.8%	92.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	12	16.0%	12.4%	8.2%	4.8%
Moderate	0	0.0%	0.0%	3.1%	2.9%	15	20.0%	16.4%	21.0%	16.5%
Middle	61	81.3%	85.1%	82.7%	81.4%	25	33.3%	29.6%	24.0%	21.9%
Upper	14	18.7%	14.9%	14.2%	15.7%	19	25.3%	34.1%	31.7%	37.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	5.3%	7.5%	15.1%	19.3%
Total	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	5.7%	4.3%	10.3%	10.1%
Middle	60	85.7%	78.8%	78.9%	83.7%
Upper	6	8.6%	16.9%	10.3%	6.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.5%	0.2%
Total	*70*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*48*	68.6%	29.2%	53.6%	47.0%
	By Loan Size				
$100,000 or less	46	65.7%	13.9%	90.1%	28.8%
$100,001-$250,000	9	12.9%	15.3%	5.5%	20.7%
$250,001-$1 Million	15	21.4%	70.7%	4.4%	50.5%
Total	*70*	*100.0%*	*100.0%*	100.0%	100.0%

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Gettysburg, PA (MSA 23900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	3	10.3%	5.6%	5.8%	3.4%
Moderate	1	3.4%	2.4%	2.1%	1.7%	6	20.7%	17.7%	23.2%	18.8%
Middle	23	79.3%	78.7%	84.3%	82.5%	7	24.1%	26.1%	25.3%	25.4%
Upper	5	17.2%	18.9%	13.6%	15.8%	9	31.0%	42.5%	25.8%	33.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	13.8%	8.1%	19.8%	18.7%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.9%	4.4%
Moderate	0	0.0%	0.0%	2.2%	2.1%	6	33.3%	27.5%	17.7%	14.3%
Middle	17	94.4%	95.0%	80.1%	78.0%	4	22.2%	22.6%	26.4%	24.3%
Upper	1	5.6%	5.0%	17.7%	19.9%	7	38.9%	44.3%	28.8%	34.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	5.6%	20.1%	22.1%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	20.8%	10.3%	10.0%	4.1%
Moderate	1	4.2%	4.4%	3.3%	3.5%	13	54.2%	44.6%	27.8%	19.4%
Middle	22	91.7%	94.8%	78.1%	78.1%	4	16.7%	31.4%	21.1%	23.7%
Upper	1	4.2%	0.7%	18.5%	18.4%	2	8.3%	13.7%	38.9%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	2.7%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	8	10.7%	3.3%	6.5%	3.6%
Moderate	2	2.7%	1.4%	2.2%	1.8%	25	33.3%	19.2%	21.9%	17.3%
Middle	66	88.0%	86.9%	82.6%	81.4%	15	20.0%	21.8%	25.2%	24.7%
Upper	7	9.3%	11.7%	15.2%	16.8%	18	24.0%	36.8%	27.7%	34.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	12.0%	18.9%	18.7%	20.4%
Total	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*75*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	9.6%	6.8%	10.2%	8.4%
Middle	43	82.7%	90.1%	77.5%	83.9%
Upper	4	7.7%	3.1%	11.9%	7.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.4%	0.2%
Total	*52*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*35*	67.3%	44.2%	53.9%	42.1%
	By Loan Size				
$100,000 or less	32	61.5%	20.9%	91.4%	35.6%
$100,001-$250,000	10	19.2%	22.2%	4.6%	18.8%
$250,001-$1 Million	10	19.2%	56.8%	3.9%	45.6%
Total	*52*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Gettysburg, PA (MSA 23900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.0%	3.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	10.0%	8.3%	18.8%	15.0%
Middle	27	90.0%	89.7%	90.7%	89.0%	9	30.0%	27.8%	25.6%	24.7%
Upper	3	10.0%	10.3%	9.3%	11.0%	17	56.7%	59.4%	28.0%	35.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.3%	4.4%	21.6%	21.4%
Total	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	4	11.8%	4.8%	4.7%	2.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	2.9%	0.9%	13.1%	9.3%
Middle	29	85.3%	79.1%	90.0%	88.6%	6	17.6%	13.0%	19.5%	17.0%
Upper	5	14.7%	20.9%	10.0%	11.4%	17	50.0%	68.4%	36.0%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	17.6%	12.8%	26.8%	30.2%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	3	21.4%	7.8%	9.7%	3.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	4	28.6%	26.7%	20.7%	19.3%
Middle	13	92.9%	95.6%	90.8%	85.4%	2	14.3%	15.6%	22.6%	21.8%
Upper	1	7.1%	4.4%	9.2%	14.6%	5	35.7%	50.0%	44.2%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	5.0%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	7	8.9%	2.7%	5.6%	3.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	8	10.1%	4.3%	16.5%	12.5%
Middle	70	88.6%	84.0%	90.4%	88.8%	17	21.5%	19.3%	22.7%	21.1%
Upper	9	11.4%	16.0%	9.6%	11.2%	39	49.4%	63.8%	32.4%	37.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	10.1%	10.0%	22.8%	25.5%
Total	*79*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*79*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	45	97.8%	97.6%	92.9%	92.4%
Upper	1	2.2%	2.4%	7.1%	7.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*46*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*23*	50.0%	29.9%	53.0%	40.3%
	By Loan Size				
$100,000 or less	22	47.8%	14.2%	92.2%	38.3%
$100,001-$250,000	9	19.6%	16.8%	4.4%	20.8%
$250,001-$1 Million	15	32.6%	69.0%	3.3%	40.9%
Total	*46*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Gettysburg, PA (MSA 23900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	4	10.8%	5.4%	7.5%	4.2%
Moderate	0	0.0%	0.0%	0.0%	0.0%	7	18.9%	12.9%	21.7%	17.5%
Middle	33	89.2%	93.5%	91.3%	89.4%	9	24.3%	20.7%	23.6%	23.3%
Upper	4	10.8%	6.5%	8.7%	10.6%	13	35.1%	55.4%	24.5%	33.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	10.8%	5.6%	22.8%	21.1%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.9%	5.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	7	36.8%	29.9%	18.3%	14.0%
Middle	15	78.9%	78.9%	89.9%	88.0%	6	31.6%	25.7%	23.9%	22.8%
Upper	4	21.1%	21.1%	10.1%	12.0%	3	15.8%	31.2%	25.9%	32.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	15.8%	13.1%	24.1%	26.0%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	4.0%	11.4%	4.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	6	37.5%	12.7%	23.9%	22.3%
Middle	14	87.5%	89.9%	91.5%	89.2%	2	12.5%	6.6%	28.4%	27.4%
Upper	2	12.5%	10.1%	8.5%	10.8%	4	25.0%	15.6%	34.3%	41.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	6.3%	61.1%	2.0%	4.3%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	90.0%	96.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.0%	3.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	7	9.7%	4.0%	7.9%	4.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	20	27.8%	17.3%	20.4%	15.9%
Middle	62	86.1%	89.6%	90.8%	89.0%	17	23.6%	21.6%	23.9%	22.7%
Upper	10	13.9%	10.4%	9.2%	11.0%	20	27.8%	47.8%	25.6%	32.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	11.1%	9.3%	22.2%	24.2%
Total	*72*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*72*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	48	98.0%	97.5%	92.0%	90.9%
Upper	1	2.0%	2.5%	6.9%	8.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.1%	0.5%
Total	*49*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*29*	59.2%	38.9%	50.3%	38.9%
	By Loan Size				
$100,000 or less	26	53.1%	14.9%	92.1%	36.9%
$100,001-$250,000	9	18.4%	16.6%	4.0%	16.6%
$250,001-$1 Million	14	28.6%	68.5%	3.8%	46.5%
Total	*49*	*100.0%*	*100.0%*	100.0%	100.0%

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Gettysburg, PA (MSA 23900)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	6.3%	3.5%	6.4%	3.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	5	15.6%	10.4%	20.6%	15.6%
Middle	23	71.9%	58.0%	90.0%	86.9%	10	31.3%	27.7%	25.2%	24.5%
Upper	9	28.1%	42.0%	10.0%	13.1%	9	28.1%	45.6%	30.4%	39.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	18.8%	12.8%	17.4%	16.9%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.3%	2.0%	5.0%	3.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	9.7%	17.8%	12.8%
Middle	17	89.5%	87.5%	92.5%	90.3%	4	21.1%	18.5%	21.9%	20.3%
Upper	2	10.5%	12.5%	7.5%	9.7%	5	26.3%	31.9%	35.9%	41.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	36.8%	37.8%	19.5%	22.7%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	15.4%	3.6%	9.1%	1.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	4	30.8%	25.0%	19.1%	18.4%
Middle	13	100.0%	100.0%	92.2%	87.7%	3	23.1%	36.6%	27.0%	32.8%
Upper	0	0.0%	0.0%	7.8%	12.3%	4	30.8%	34.8%	42.6%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.2%	4.2%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	7.8%	3.0%	6.1%	3.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	11	17.2%	10.4%	19.4%	14.6%
Middle	53	82.8%	68.8%	91.1%	88.2%	17	26.6%	24.6%	24.1%	23.1%
Upper	11	17.2%	31.2%	8.9%	11.8%	18	28.1%	40.7%	33.4%	40.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	20.3%	21.3%	17.0%	18.9%
Total	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*64*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	34	94.4%	91.7%	92.4%	94.5%
Upper	2	5.6%	8.3%	6.2%	5.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.2%
Total	*36*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*20*	55.6%	35.2%	43.9%	38.8%
	By Loan Size				
$100,000 or less	21	58.3%	16.6%	89.6%	31.4%
$100,001-$250,000	7	19.4%	18.8%	5.1%	17.2%
$250,001-$1 Million	8	22.2%	64.6%	5.3%	51.3%
Total	*36*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Lancaster, PA (MSA 29540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	2.7%	2.3%	3.0%	1.8%	1	2.7%	1.0%	6.6%	3.8%
Moderate	3	8.1%	4.7%	12.8%	8.7%	5	13.5%	9.4%	24.8%	19.5%
Middle	28	75.7%	79.7%	70.9%	73.0%	16	43.2%	33.6%	23.7%	23.0%
Upper	5	13.5%	13.3%	13.3%	16.5%	12	32.4%	47.2%	31.4%	40.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	8.1%	8.8%	13.6%	13.4%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	1.3%	1.0%	1.6%	0.8%	7	9.2%	3.8%	8.3%	4.9%
Moderate	7	9.2%	3.9%	8.3%	5.6%	13	17.1%	16.0%	21.7%	17.5%
Middle	59	77.6%	84.1%	76.0%	76.8%	16	21.1%	13.7%	24.4%	22.8%
Upper	9	11.8%	11.1%	14.1%	16.7%	35	46.1%	58.0%	38.7%	47.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	6.6%	8.5%	6.8%	7.8%
Total	*76*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*76*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.1%	0.8%	1	2.5%	2.2%	5.6%	3.8%
Moderate	1	2.5%	1.4%	6.8%	5.2%	8	20.0%	14.8%	17.3%	14.0%
Middle	30	75.0%	55.7%	77.5%	75.0%	14	35.0%	22.6%	26.8%	22.5%
Upper	9	22.5%	42.9%	14.6%	19.1%	17	42.5%	60.5%	48.1%	54.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.3%	5.2%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	13.1%	3.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.2%	3.4%	0	0.0%	0.0%	2.4%	0.1%
Middle	3	100.0%	100.0%	59.5%	82.9%	0	0.0%	0.0%	1.2%	0.1%
Upper	0	0.0%	0.0%	7.1%	10.3%	0	0.0%	0.0%	8.3%	1.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	88.1%	98.8%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	1.3%	0.5%	2.5%	1.6%	9	5.8%	1.0%	7.0%	3.7%
Moderate	11	7.1%	1.5%	10.8%	7.4%	26	16.7%	5.4%	23.0%	17.1%
Middle	120	76.9%	91.0%	73.1%	74.9%	46	29.5%	9.1%	24.1%	20.9%
Upper	23	14.7%	6.9%	13.6%	16.1%	64	41.0%	22.2%	35.1%	38.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	7.1%	62.3%	10.9%	19.4%
Total	*156*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*156*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	9	6.2%	8.9%	3.1%	4.1%
Moderate	15	10.3%	15.0%	9.2%	10.2%
Middle	110	75.9%	67.9%	74.7%	73.7%
Upper	11	7.6%	8.2%	12.2%	11.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.8%	0.2%
Total	*145*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*80*	55.2%	22.4%	49.7%	37.9%
	By Loan Size				
$100,000 or less	86	59.3%	9.3%	89.9%	28.5%
$100,001-$250,000	18	12.4%	11.8%	4.6%	16.1%
$250,001-$1 Million	41	28.3%	78.9%	5.5%	55.4%
Total	*145*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Lancaster, PA (MSA 29540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	5.3%	2.3%	2.4%	1.3%	0	0.0%	0.0%	6.6%	3.8%
Moderate	1	5.3%	2.2%	12.8%	8.3%	7	36.8%	33.9%	22.6%	17.6%
Middle	12	63.2%	63.6%	71.2%	73.1%	2	10.5%	7.8%	24.7%	23.7%
Upper	5	26.3%	31.9%	13.6%	17.3%	7	36.8%	43.5%	31.9%	41.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	15.8%	14.8%	14.2%	13.0%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.9%	1.1%	1	7.1%	4.6%	7.3%	4.3%
Moderate	2	14.3%	10.5%	8.8%	5.7%	1	7.1%	3.7%	15.9%	12.4%
Middle	12	85.7%	89.5%	75.6%	77.3%	4	28.6%	31.2%	25.1%	22.2%
Upper	0	0.0%	0.0%	13.7%	15.8%	4	28.6%	30.6%	35.7%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	28.6%	29.8%	16.0%	16.7%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	5.0%	0.9%	1.9%	1.2%	0	0.0%	0.0%	7.0%	4.3%
Moderate	3	15.0%	10.5%	7.3%	5.1%	6	30.0%	49.1%	17.4%	15.3%
Middle	16	80.0%	88.6%	78.0%	79.9%	7	35.0%	21.1%	27.0%	24.3%
Upper	0	0.0%	0.0%	12.8%	13.9%	6	30.0%	22.5%	46.4%	51.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	5.0%	7.3%	2.2%	4.5%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	12.7%	3.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	20.3%	13.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	62.0%	71.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	5.1%	11.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	3.6%	0.3%	2.3%	1.5%	1	1.8%	0.4%	6.8%	3.6%
Moderate	6	10.9%	1.4%	11.3%	8.1%	14	25.5%	5.7%	20.2%	14.5%
Middle	40	72.7%	18.0%	72.9%	74.1%	13	23.6%	4.2%	24.8%	21.0%
Upper	7	12.7%	80.3%	13.5%	16.3%	17	30.9%	9.1%	33.9%	38.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	18.2%	80.7%	14.3%	22.3%
Total	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*55*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	4	3.3%	3.9%	3.3%	3.1%
Moderate	9	7.4%	8.5%	9.4%	8.7%
Middle	103	84.4%	77.6%	75.4%	76.9%
Upper	6	4.9%	10.0%	11.0%	11.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.9%	0.2%
Total	*122*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*68*	55.7%	35.1%	50.8%	39.3%
	By Loan Size				
$100,000 or less	51	41.8%	6.9%	89.4%	28.6%
$100,001-$250,000	26	21.3%	12.0%	5.1%	16.7%
$250,001-$1 Million	45	36.9%	81.1%	5.5%	54.7%
Total	*122*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Lancaster, PA (MSA 29540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.5%	1.4%	0	0.0%	0.0%	6.7%	3.8%
Moderate	0	0.0%	0.0%	8.7%	7.0%	1	12.5%	9.4%	23.4%	18.1%
Middle	3	37.5%	29.6%	75.4%	74.3%	3	37.5%	45.3%	23.6%	22.3%
Upper	5	62.5%	70.4%	13.4%	17.2%	4	50.0%	45.3%	29.5%	38.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.8%	17.6%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.4%	0.8%	0	0.0%	0.0%	5.0%	2.8%
Moderate	1	6.3%	3.3%	4.9%	3.2%	3	18.8%	12.6%	15.4%	11.0%
Middle	12	75.0%	56.4%	77.1%	76.5%	3	18.8%	12.1%	22.5%	20.0%
Upper	3	18.8%	40.2%	16.6%	19.5%	7	43.8%	57.0%	35.7%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	18.3%	21.3%	23.2%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.6%	0.8%	2	50.0%	36.8%	6.8%	3.0%
Moderate	1	25.0%	26.3%	5.2%	2.9%	0	0.0%	0.0%	19.2%	12.4%
Middle	3	75.0%	73.7%	80.2%	80.7%	1	25.0%	47.4%	24.0%	20.0%
Upper	0	0.0%	0.0%	13.0%	15.6%	1	25.0%	15.8%	47.0%	59.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.9%	5.1%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	22.5%	6.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	16.9%	2.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	59.2%	90.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	1.4%	1.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	2.1%	1.5%	2	7.1%	0.2%	6.1%	3.2%
Moderate	2	7.1%	2.5%	7.2%	5.3%	4	14.3%	11.7%	20.1%	14.5%
Middle	18	64.3%	49.0%	76.2%	76.2%	7	25.0%	21.5%	23.1%	20.2%
Upper	8	28.6%	48.4%	14.5%	17.1%	12	42.9%	53.6%	32.7%	38.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	10.7%	13.1%	17.9%	23.9%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	4.2%	3.8%
Moderate	1	5.9%	1.9%	4.5%	3.6%
Middle	11	64.7%	66.8%	77.5%	78.5%
Upper	5	29.4%	31.3%	13.8%	14.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*17*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	35.3%	17.5%	45.4%	35.0%
	By Loan Size				
$100,000 or less	7	41.2%	6.5%	90.8%	31.3%
$100,001-$250,000	3	17.6%	9.2%	4.5%	16.5%
$250,001-$1 Million	7	41.2%	84.2%	4.7%	52.2%
Total	*17*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Lancaster, PA (MSA 29540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	2.4%	1.4%	5	16.7%	10.4%	7.3%	4.2%
Moderate	3	10.0%	6.1%	7.8%	4.8%	8	26.7%	22.9%	23.7%	18.8%
Middle	21	70.0%	63.5%	76.5%	76.8%	5	16.7%	18.8%	23.1%	22.6%
Upper	6	20.0%	30.4%	13.4%	17.1%	7	23.3%	33.7%	27.9%	37.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	16.7%	14.2%	18.0%	16.7%
Total	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	5.6%	1.0%	1.7%	0.8%	1	2.8%	1.2%	5.1%	2.7%
Moderate	4	11.1%	6.9%	6.0%	3.7%	4	11.1%	8.5%	17.3%	12.9%
Middle	26	72.2%	71.3%	77.3%	78.3%	6	16.7%	12.2%	23.3%	20.4%
Upper	4	11.1%	20.9%	15.1%	17.2%	12	33.3%	54.7%	33.9%	40.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	36.1%	23.3%	20.4%	24.0%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.8%	1.2%	3	15.8%	2.8%	8.1%	3.5%
Moderate	4	21.1%	7.4%	7.1%	5.7%	7	36.8%	13.5%	19.6%	13.8%
Middle	11	57.9%	81.4%	77.1%	73.4%	1	5.3%	4.3%	24.3%	18.9%
Upper	4	21.1%	11.2%	14.0%	19.6%	6	31.6%	18.1%	43.3%	55.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	61.2%	4.8%	8.0%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	23.1%	7.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.5%	2.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	80.0%	83.6%	52.3%	82.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	20.0%	16.4%	6.2%	8.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	100.0%	100.0%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	2.2%	0.1%	2.2%	1.6%	9	10.0%	0.9%	6.5%	3.4%
Moderate	11	12.2%	1.3%	7.1%	4.3%	19	21.1%	2.7%	21.0%	15.3%
Middle	62	68.9%	80.8%	76.7%	77.6%	12	13.3%	2.8%	23.2%	20.0%
Upper	15	16.7%	17.9%	14.0%	16.5%	25	27.8%	8.6%	31.0%	36.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	27.8%	85.0%	18.3%	25.1%
Total	*90*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*90*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	4.1%	3.9%
Moderate	1	5.9%	1.9%	4.5%	4.7%
Middle	11	64.7%	66.8%	76.9%	74.9%
Upper	5	29.4%	31.3%	12.9%	16.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.7%	0.3%
Total	*17*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	35.3%	17.5%	49.6%	35.3%
	By Loan Size				
$100,000 or less	7	41.2%	6.5%	89.9%	29.8%
$100,001-$250,000	3	17.6%	9.2%	4.9%	17.5%
$250,001-$1 Million	7	41.2%	84.2%	5.2%	52.7%
Total	*17*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Lancaster, PA (MSA 29540)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	3	4.8%	2.1%	2.4%	1.6%	8	12.9%	5.0%	6.9%	3.8%
Moderate	14	22.6%	10.8%	8.1%	5.0%	16	25.8%	14.8%	23.6%	18.6%
Middle	38	61.3%	75.7%	76.1%	76.0%	15	24.2%	17.2%	24.7%	23.9%
Upper	7	11.3%	11.5%	13.5%	17.4%	13	21.0%	20.3%	29.3%	38.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	16.1%	42.7%	15.5%	15.0%
Total	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*62*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	2	7.4%	2.4%	1.7%	1.2%	1	3.7%	0.8%	6.2%	3.8%
Moderate	4	14.8%	6.5%	6.8%	4.3%	2	7.4%	5.9%	16.7%	13.1%
Middle	15	55.6%	46.2%	77.3%	76.5%	5	18.5%	13.7%	22.3%	20.1%
Upper	6	22.2%	44.9%	14.2%	18.1%	10	37.0%	50.7%	36.4%	42.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	33.3%	28.9%	18.4%	20.1%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.3%	1.6%	5	20.0%	5.3%	7.4%	2.7%
Moderate	5	20.0%	10.1%	6.0%	5.0%	7	28.0%	11.3%	16.8%	10.7%
Middle	20	80.0%	89.9%	77.7%	76.7%	6	24.0%	14.9%	27.7%	25.0%
Upper	0	0.0%	0.0%	15.0%	16.7%	7	28.0%	68.4%	44.1%	55.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	6.0%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	25.0%	10.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	22.5%	5.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	40.0%	79.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	12.5%	4.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	5	4.3%	2.1%	2.2%	1.7%	14	12.1%	3.9%	6.7%	3.7%
Moderate	23	19.8%	9.5%	7.5%	4.8%	25	21.6%	12.2%	20.7%	16.1%
Middle	75	64.7%	69.1%	76.5%	76.3%	26	22.4%	15.9%	24.0%	22.1%
Upper	13	11.2%	19.3%	13.8%	17.3%	30	25.9%	28.5%	32.7%	39.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	18.1%	39.4%	15.9%	18.7%
Total	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*116*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	4.1%	5.9%	4.4%	5.9%
Moderate	8	6.6%	6.5%	4.5%	4.7%
Middle	89	73.6%	72.4%	76.3%	74.0%
Upper	19	15.7%	15.1%	13.1%	15.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.8%	0.3%
Total	*121*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*59*	48.8%	32.8%	46.4%	35.6%
	By Loan Size				
$100,000 or less	46	38.0%	7.2%	88.5%	25.4%
$100,001-$250,000	31	25.6%	18.6%	5.4%	17.5%
$250,001-$1 Million	44	36.4%	74.2%	6.1%	57.2%
Total	*121*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Lebanon, PA (MSA 30140)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.2%	0.6%	0	0.0%	0.0%	8.5%	4.7%
Moderate	1	12.5%	2.9%	14.2%	9.1%	0	0.0%	0.0%	22.2%	17.2%
Middle	5	62.5%	66.7%	64.6%	66.3%	2	25.0%	18.3%	22.9%	22.8%
Upper	2	25.0%	30.4%	20.0%	24.1%	5	62.5%	78.8%	28.8%	38.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	12.5%	2.9%	17.7%	17.2%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.6%	0.6%	7	17.9%	10.6%	8.6%	5.0%
Moderate	7	17.9%	12.8%	10.9%	7.0%	9	23.1%	18.8%	22.3%	17.8%
Middle	24	61.5%	57.5%	65.9%	66.1%	9	23.1%	20.3%	22.8%	21.5%
Upper	8	20.5%	29.6%	22.6%	26.3%	13	33.3%	48.9%	36.2%	42.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.6%	1.4%	10.1%	12.9%
Total	*39*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*39*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.6%	0.5%	1	16.7%	15.1%	8.1%	5.5%
Moderate	1	16.7%	17.2%	10.3%	8.2%	0	0.0%	0.0%	17.1%	17.0%
Middle	3	50.0%	52.7%	65.7%	66.2%	4	66.7%	69.9%	23.4%	22.9%
Upper	2	33.3%	30.1%	23.4%	25.2%	1	16.7%	15.1%	50.2%	52.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.2%	2.1%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	3.2%	0.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	45.2%	19.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	38.7%	20.0%	0	0.0%	0.0%	9.7%	1.3%
Upper	0	0.0%	0.0%	12.9%	60.0%	0	0.0%	0.0%	16.1%	3.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	74.2%	95.3%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.0%	0.5%	8	15.1%	7.4%	8.4%	4.3%
Moderate	9	17.0%	9.9%	13.3%	9.6%	9	17.0%	11.6%	21.6%	15.7%
Middle	32	60.4%	60.2%	64.8%	62.0%	15	28.3%	22.5%	22.8%	20.6%
Upper	12	22.6%	29.9%	20.9%	27.9%	19	35.8%	56.7%	32.5%	36.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.8%	1.8%	14.7%	23.1%
Total	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	5.0%	4.9%	0.9%	0.7%
Moderate	4	20.0%	5.1%	14.8%	14.3%
Middle	14	70.0%	73.5%	65.3%	63.9%
Upper	1	5.0%	16.5%	17.6%	20.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.6%
Total	*20*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*11*	55.0%	41.3%	48.0%	35.0%
	By Loan Size				
$100,000 or less	13	65.0%	14.5%	92.7%	35.9%
$100,001-$250,000	3	15.0%	18.8%	3.8%	17.0%
$250,001-$1 Million	4	20.0%	66.7%	3.5%	47.1%
Total	*20*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Lebanon, PA (MSA 30140)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	20.0%	10.8%	1.6%	0.8%	2	20.0%	14.9%	5.5%	2.8%
Moderate	2	20.0%	13.7%	13.4%	8.5%	2	20.0%	13.7%	20.7%	15.7%
Middle	6	60.0%	75.4%	65.0%	66.7%	3	30.0%	23.8%	25.1%	24.3%
Upper	0	0.0%	0.0%	20.0%	24.0%	1	10.0%	15.1%	31.1%	40.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	20.0%	32.5%	17.6%	16.6%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.4%	1.0%	0	0.0%	0.0%	6.5%	3.7%
Moderate	2	25.0%	24.7%	13.2%	7.8%	2	25.0%	16.7%	15.7%	12.1%
Middle	3	37.5%	25.9%	67.2%	69.0%	2	25.0%	30.3%	20.3%	17.6%
Upper	3	37.5%	49.4%	18.3%	22.1%	0	0.0%	0.0%	36.3%	44.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	50.0%	53.0%	21.2%	22.3%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.6%	1.0%	1	14.3%	5.5%	7.3%	4.9%
Moderate	0	0.0%	0.0%	8.9%	4.6%	4	57.1%	45.2%	19.2%	9.3%
Middle	5	71.4%	45.2%	62.6%	65.5%	2	28.6%	49.3%	24.5%	22.6%
Upper	2	28.6%	54.8%	25.8%	28.9%	0	0.0%	0.0%	45.7%	59.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.3%	4.2%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	38.5%	11.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	42.3%	84.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	19.2%	3.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	8.0%	6.0%	1.6%	0.8%	3	12.0%	8.4%	5.9%	2.9%
Moderate	4	16.0%	17.9%	13.2%	8.4%	8	32.0%	15.9%	19.1%	13.6%
Middle	14	56.0%	53.7%	65.2%	68.5%	7	28.0%	27.3%	23.6%	21.0%
Upper	5	20.0%	22.4%	20.0%	22.3%	1	4.0%	8.3%	33.4%	39.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	24.0%	40.2%	18.0%	23.2%
Total	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.9%	1.9%
Moderate	1	10.0%	18.1%	15.2%	21.1%
Middle	2	20.0%	19.9%	65.4%	56.5%
Upper	7	70.0%	61.9%	17.6%	20.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.9%	0.5%
Total	*10*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*7*	70.0%	60.1%	51.2%	40.5%
	By Loan Size				
$100,000 or less	5	50.0%	14.5%	91.7%	33.9%
$100,001-$250,000	0	0.0%	0.0%	4.0%	17.2%
$250,001-$1 Million	5	50.0%	85.5%	4.3%	48.9%
Total	*10*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Lebanon, PA (MSA 30140)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.1%	4.0%
Moderate	0	0.0%	0.0%	7.3%	4.1%	1	12.5%	9.4%	22.9%	17.1%
Middle	3	37.5%	29.6%	59.5%	54.1%	3	37.5%	45.3%	22.5%	21.2%
Upper	5	62.5%	70.4%	33.3%	41.7%	4	50.0%	45.3%	29.0%	39.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	18.5%	18.2%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.9%	2.7%
Moderate	1	6.3%	3.3%	4.4%	2.2%	3	18.8%	12.6%	15.8%	11.0%
Middle	12	75.0%	56.4%	62.6%	57.3%	3	18.8%	12.1%	20.6%	17.4%
Upper	3	18.8%	40.2%	33.0%	40.6%	7	43.8%	57.0%	35.4%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	18.8%	18.3%	23.2%	26.3%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	36.8%	6.8%	2.0%
Moderate	1	25.0%	26.3%	6.5%	1.7%	0	0.0%	0.0%	19.2%	11.7%
Middle	3	75.0%	73.7%	68.2%	67.4%	1	25.0%	47.4%	23.4%	22.1%
Upper	0	0.0%	0.0%	25.3%	30.9%	1	25.0%	15.8%	46.4%	57.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	7.1%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.8%	4.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	62.5%	64.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	18.8%	30.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	2	7.1%	0.2%	6.3%	3.3%
Moderate	2	7.1%	2.5%	6.2%	3.4%	4	14.3%	11.7%	20.1%	14.3%
Middle	18	64.3%	49.0%	61.2%	56.0%	7	25.0%	21.5%	21.8%	19.2%
Upper	8	28.6%	48.4%	32.5%	40.6%	12	42.9%	53.6%	32.5%	39.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	10.7%	13.1%	19.4%	23.4%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	5.9%	1.9%	4.5%	2.5%
Middle	11	64.7%	66.8%	66.9%	66.1%
Upper	5	29.4%	31.3%	28.6%	31.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*17*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*6*	35.3%	17.5%	49.7%	35.0%
	By Loan Size				
$100,000 or less	7	41.2%	6.5%	93.7%	36.6%
$100,001-$250,000	3	17.6%	9.2%	3.1%	14.4%
$250,001-$1 Million	7	41.2%	84.2%	3.3%	48.9%
Total	*17*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Lebanon, PA (MSA 30140)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	4.8%	8.9%	4.8%
Moderate	0	0.0%	0.0%	7.7%	4.1%	1	7.7%	4.8%	24.1%	19.4%
Middle	6	46.2%	55.3%	63.5%	58.9%	3	23.1%	18.9%	23.7%	24.8%
Upper	7	53.8%	44.7%	28.9%	37.0%	4	30.8%	36.4%	24.5%	32.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	30.8%	35.1%	18.8%	18.4%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.0%	3.5%
Moderate	0	0.0%	0.0%	5.5%	3.1%	2	28.6%	22.4%	17.1%	12.4%
Middle	5	71.4%	70.3%	61.3%	56.3%	1	14.3%	13.5%	21.7%	18.7%
Upper	2	28.6%	29.7%	33.2%	40.6%	2	28.6%	26.9%	32.0%	39.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	28.6%	37.2%	22.1%	26.1%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.9%	2.8%
Moderate	1	33.3%	39.3%	4.7%	1.9%	1	33.3%	35.7%	22.0%	14.4%
Middle	2	66.7%	60.7%	61.4%	58.2%	1	33.3%	25.0%	20.5%	22.1%
Upper	0	0.0%	0.0%	33.9%	39.9%	1	33.3%	39.3%	46.1%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	5.7%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	26.7%	15.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	46.7%	19.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	26.7%	65.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.3%	3.1%	8.1%	4.2%
Moderate	1	4.3%	0.3%	6.8%	3.9%	4	17.4%	11.1%	21.3%	16.3%
Middle	13	56.5%	60.5%	62.4%	57.0%	5	21.7%	17.1%	22.6%	21.9%
Upper	9	39.1%	39.2%	30.8%	39.1%	7	30.4%	33.1%	28.7%	34.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	26.1%	35.5%	19.3%	22.7%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	25.0%	16.7%	5.2%	6.4%
Middle	6	37.5%	37.4%	67.1%	63.4%
Upper	6	37.5%	45.9%	25.7%	29.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.0%	0.5%
Total	*16*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*4*	25.0%	14.3%	50.5%	38.9%
	By Loan Size				
$100,000 or less	5	31.3%	2.7%	92.7%	31.3%
$100,001-$250,000	3	18.8%	13.3%	3.0%	13.4%
$250,001-$1 Million	8	50.0%	84.0%	4.3%	55.2%
Total	*16*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Lebanon, PA (MSA 30140)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.4%	3.9%
Moderate	2	14.3%	11.9%	7.9%	4.1%	5	35.7%	34.2%	23.3%	17.6%
Middle	9	64.3%	68.0%	59.9%	55.1%	4	28.6%	28.9%	20.8%	20.3%
Upper	3	21.4%	20.1%	32.2%	40.8%	4	28.6%	30.4%	31.0%	41.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	7.1%	6.5%	17.4%	16.6%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.5%	2.8%	8.6%	4.7%
Moderate	1	4.5%	3.8%	7.0%	4.0%	3	13.6%	9.3%	20.1%	15.3%
Middle	13	59.1%	48.9%	66.1%	61.7%	5	22.7%	22.9%	22.7%	20.4%
Upper	8	36.4%	47.4%	26.9%	34.3%	5	22.7%	30.8%	31.6%	39.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	36.4%	34.3%	16.9%	20.3%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	5.8%	6.7%	4.1%
Moderate	1	14.3%	13.5%	4.3%	1.9%	1	14.3%	7.7%	22.1%	18.5%
Middle	3	42.9%	50.0%	63.6%	62.8%	3	42.9%	50.0%	26.9%	31.1%
Upper	3	42.9%	36.5%	32.0%	35.3%	2	28.6%	36.5%	41.1%	43.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.2%	3.0%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	19.0%	2.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	52.4%	71.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	28.6%	25.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	2	4.7%	1.7%	7.7%	3.9%
Moderate	4	9.3%	7.0%	7.4%	3.9%	9	20.9%	19.0%	21.9%	15.7%
Middle	25	58.1%	56.4%	62.4%	58.5%	12	27.9%	25.5%	21.9%	19.2%
Upper	14	32.6%	36.6%	30.2%	37.6%	11	25.6%	30.7%	31.8%	38.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	20.9%	23.0%	16.7%	22.9%
Total	*43*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*43*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	16.0%	16.7%	4.4%	4.0%
Middle	17	68.0%	51.4%	67.6%	62.8%
Upper	4	16.0%	31.9%	24.4%	32.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.7%	0.9%
Total	*25*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*8*	32.0%	17.8%	43.7%	34.3%
	By Loan Size				
$100,000 or less	8	32.0%	5.9%	91.9%	29.4%
$100,001-$250,000	7	28.0%	22.8%	4.4%	19.5%
$250,001-$1 Million	10	40.0%	71.4%	3.7%	51.1%
Total	*25*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: State College, PA (MSA 44300)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	7.1%	4.6%	7.7%	3.7%
Moderate	6	21.4%	17.4%	18.0%	14.3%	8	28.6%	25.6%	18.6%	13.3%
Middle	14	50.0%	47.5%	45.4%	40.4%	9	32.1%	34.4%	23.9%	21.8%
Upper	7	25.0%	30.6%	35.4%	43.9%	7	25.0%	29.0%	41.9%	53.7%
Unknown	1	3.6%	4.5%	1.2%	1.5%	2	7.1%	6.5%	7.8%	7.5%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	8	14.0%	8.3%	10.2%	5.5%
Moderate	5	8.8%	5.0%	17.1%	16.3%	12	21.1%	18.5%	21.0%	15.9%
Middle	27	47.4%	41.9%	49.9%	43.9%	12	21.1%	20.8%	25.0%	23.0%
Upper	24	42.1%	51.7%	32.0%	38.6%	21	36.8%	46.1%	36.0%	46.4%
Unknown	1	1.8%	1.4%	1.0%	1.1%	4	7.0%	6.4%	7.8%	9.2%
Total	*57*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*57*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	4	16.7%	8.1%	8.2%	5.4%
Moderate	1	4.2%	0.7%	13.8%	12.7%	3	12.5%	24.7%	15.6%	16.0%
Middle	14	58.3%	66.0%	53.8%	49.5%	5	20.8%	15.5%	31.0%	28.1%
Upper	9	37.5%	33.3%	32.1%	37.6%	11	45.8%	46.3%	42.7%	48.6%
Unknown	0	0.0%	0.0%	0.3%	0.2%	1	4.2%	5.4%	2.4%	1.9%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	56.0%	35.3%	0	0.0%	0.0%	12.0%	0.7%
Middle	0	0.0%	0.0%	24.0%	3.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.0%	1.4%	0	0.0%	0.0%	8.0%	2.5%
Unknown	0	0.0%	0.0%	16.0%	60.2%	0	0.0%	0.0%	80.0%	96.8%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	14	12.8%	6.9%	8.4%	3.7%
Moderate	12	11.0%	9.1%	17.5%	17.3%	23	21.1%	21.9%	19.0%	12.4%
Middle	55	50.5%	47.0%	47.6%	36.8%	26	23.9%	25.2%	24.9%	19.6%
Upper	40	36.7%	41.5%	33.8%	37.2%	39	35.8%	39.7%	40.0%	45.5%
Unknown	2	1.8%	2.4%	1.1%	8.3%	7	6.4%	6.3%	7.7%	18.8%
Total	*109*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*109*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	12	16.7%	19.3%	19.0%	20.5%
Middle	39	54.2%	55.5%	41.9%	43.5%
Upper	13	18.1%	9.3%	30.3%	27.5%
Unknown	8	11.1%	15.9%	7.5%	7.8%
Tract Unknown	0	0.0%	0.0%	1.2%	0.7%
Total	*72*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*35*	48.6%	18.4%	45.9%	36.4%
	By Loan Size				
$100,000 or less	54	75.0%	18.2%	94.5%	41.1%
$100,001-$250,000	7	9.7%	16.4%	2.8%	14.9%
$250,001-$1 Million	11	15.3%	65.4%	2.7%	44.1%
Total	*72*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: State College, PA (MSA 44300)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	15.4%	7.2%	5.4%	2.7%
Moderate	1	7.7%	14.3%	15.3%	11.7%	2	15.4%	13.5%	15.8%	11.0%
Middle	9	69.2%	51.9%	45.9%	41.3%	4	30.8%	36.0%	23.0%	20.4%
Upper	3	23.1%	33.9%	37.3%	45.0%	2	15.4%	29.9%	43.6%	54.5%
Unknown	0	0.0%	0.0%	1.5%	2.0%	3	23.1%	13.4%	12.2%	11.4%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	6	33.3%	21.8%	9.1%	4.9%
Moderate	1	5.6%	4.5%	16.0%	13.4%	1	5.6%	3.0%	16.6%	11.9%
Middle	10	55.6%	51.5%	49.6%	43.5%	4	22.2%	21.8%	22.6%	19.8%
Upper	7	38.9%	44.0%	32.9%	41.9%	7	38.9%	53.4%	40.2%	47.5%
Unknown	0	0.0%	0.0%	1.5%	1.3%	0	0.0%	0.0%	11.5%	15.8%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	8	50.0%	40.4%	10.2%	3.8%
Moderate	2	12.5%	12.1%	14.8%	10.8%	2	12.5%	10.1%	14.8%	8.1%
Middle	10	62.5%	59.6%	54.6%	54.2%	4	25.0%	26.3%	26.0%	23.4%
Upper	4	25.0%	28.3%	29.6%	32.4%	2	12.5%	23.2%	46.4%	60.7%
Unknown	0	0.0%	0.0%	1.0%	2.6%	0	0.0%	0.0%	2.6%	4.0%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	4.2%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	31.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	20.8%	12.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	12.7%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	8.3%	42.2%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.1%	16	34.0%	16.1%	7.0%	3.1%
Moderate	4	8.5%	8.7%	15.8%	13.6%	5	10.6%	7.5%	15.8%	10.4%
Middle	29	61.7%	51.8%	47.7%	40.2%	12	25.5%	27.8%	23.0%	18.9%
Upper	14	29.8%	39.4%	35.0%	41.5%	11	23.4%	42.9%	42.5%	49.0%
Unknown	0	0.0%	0.0%	1.5%	4.6%	3	6.4%	5.6%	11.7%	18.6%
Total	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*47*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.1%	0.0%
Moderate	2	6.1%	2.4%	18.2%	14.8%
Middle	12	36.4%	50.3%	41.1%	50.8%
Upper	11	33.3%	25.5%	30.4%	26.1%
Unknown	8	24.2%	21.8%	9.2%	7.8%
Tract Unknown	0	0.0%	0.0%	1.0%	0.5%
Total	*33*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*14*	42.4%	23.8%	48.4%	39.5%
	By Loan Size				
$100,000 or less	11	33.3%	6.8%	92.1%	32.8%
$100,001-$250,000	8	24.2%	15.0%	3.4%	13.6%
$250,001-$1 Million	14	42.4%	78.2%	4.5%	53.6%
Total	*33*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: State College, PA (MSA 44300)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.3%	0.3%	1	4.2%	3.8%	7.6%	3.6%
Moderate	1	4.2%	1.7%	8.7%	5.4%	4	16.7%	13.2%	17.5%	12.2%
Middle	14	58.3%	66.4%	58.8%	55.5%	3	12.5%	14.0%	23.7%	21.0%
Upper	9	37.5%	31.9%	32.2%	38.2%	7	29.2%	49.6%	41.7%	54.0%
Unknown	0	0.0%	0.0%	0.1%	0.6%	9	37.5%	19.4%	9.6%	9.2%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.1%	1	3.1%	1.6%	5.3%	2.9%
Moderate	0	0.0%	0.0%	9.2%	8.0%	5	15.6%	13.3%	14.3%	9.9%
Middle	21	65.6%	46.8%	55.7%	49.7%	3	9.4%	6.4%	22.5%	18.2%
Upper	11	34.4%	53.2%	35.0%	42.1%	17	53.1%	68.4%	42.9%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	18.8%	10.3%	15.0%	19.3%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.4%	1.0%	7	36.8%	27.6%	11.0%	3.4%
Moderate	2	10.5%	7.6%	14.8%	10.5%	6	31.6%	24.8%	18.9%	8.5%
Middle	14	73.7%	69.5%	56.8%	45.0%	3	15.8%	25.7%	28.0%	34.6%
Upper	3	15.8%	22.9%	28.0%	43.6%	3	15.8%	21.9%	38.6%	46.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.4%	6.6%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	26.3%	9.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	47.4%	83.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	21.1%	7.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	5.3%	0.3%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.2%	0.2%	9	11.7%	0.4%	6.9%	2.9%
Moderate	3	3.9%	0.1%	9.4%	6.9%	15	19.5%	1.9%	16.2%	9.7%
Middle	51	66.2%	93.5%	57.3%	56.8%	9	11.7%	1.4%	23.4%	17.7%
Upper	23	29.9%	6.4%	33.0%	35.7%	27	35.1%	8.8%	41.7%	45.4%
Unknown	0	0.0%	0.0%	0.1%	0.3%	17	22.1%	87.5%	11.8%	24.2%
Total	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*77*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	4.3%	3.0%	6.0%	6.9%
Moderate	3	6.4%	0.8%	11.9%	8.9%
Middle	28	59.6%	54.4%	49.9%	50.3%
Upper	14	29.8%	41.8%	32.0%	33.9%
Unknown	0	0.0%	0.0%	0.2%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*47*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*20*	42.6%	24.0%	45.0%	45.1%
	By Loan Size				
$100,000 or less	21	44.7%	8.5%	91.8%	31.1%
$100,001-$250,000	7	14.9%	11.0%	3.6%	14.2%
$250,001-$1 Million	19	40.4%	80.5%	4.7%	54.6%
Total	*47*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: State College, PA (MSA 44300)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.4%	0.3%	2	10.0%	5.5%	6.2%	3.0%
Moderate	1	5.0%	5.3%	10.5%	7.0%	5	25.0%	27.1%	16.3%	11.4%
Middle	14	70.0%	67.9%	57.0%	54.3%	2	10.0%	13.5%	22.0%	20.0%
Upper	5	25.0%	26.8%	32.0%	38.3%	6	30.0%	33.4%	42.3%	53.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	25.0%	20.5%	13.1%	12.2%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.3%	0.5%	6	20.0%	10.1%	6.2%	3.0%
Moderate	4	13.3%	12.0%	9.0%	6.0%	6	20.0%	16.9%	14.2%	9.9%
Middle	19	63.3%	59.4%	56.6%	53.3%	8	26.7%	30.7%	21.8%	17.6%
Upper	7	23.3%	28.5%	34.1%	40.2%	5	16.7%	24.3%	42.5%	52.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	16.7%	18.1%	15.2%	17.2%
Total	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.3%	0.2%	3	33.3%	1.9%	12.4%	4.4%
Moderate	2	22.2%	1.2%	14.0%	7.6%	2	22.2%	3.0%	17.1%	6.6%
Middle	7	77.8%	98.8%	58.4%	66.9%	2	22.2%	1.8%	25.2%	14.0%
Upper	0	0.0%	0.0%	27.3%	25.3%	0	0.0%	0.0%	42.2%	49.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	93.2%	3.1%	25.7%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	5.6%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	22.2%	4.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	66.7%	44.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	5.6%	50.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.4%	0.4%	11	18.6%	7.4%	6.8%	2.8%
Moderate	7	11.9%	8.3%	10.3%	6.5%	13	22.0%	19.6%	15.5%	9.8%
Middle	40	67.8%	66.7%	57.1%	53.6%	12	20.3%	21.0%	22.1%	17.5%
Upper	12	20.3%	25.0%	32.2%	39.4%	11	18.6%	25.6%	42.2%	48.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	20.3%	26.4%	13.4%	21.1%
Total	*59*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	7	11.9%	5.4%	5.8%	5.1%
Moderate	9	15.3%	9.9%	11.6%	7.8%
Middle	29	49.2%	51.9%	49.4%	48.3%
Upper	14	23.7%	32.9%	31.1%	38.2%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	1.9%	0.5%
Total	*59*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*31*	52.5%	36.5%	49.3%	44.1%
	By Loan Size				
$100,000 or less	25	42.4%	8.0%	89.6%	28.8%
$100,001-$250,000	11	18.6%	12.6%	4.6%	14.8%
$250,001-$1 Million	23	39.0%	79.4%	5.7%	56.4%
Total	*59*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: State College, PA (MSA 44300)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.4%	0.8%	1	5.3%	2.8%	8.1%	4.5%
Moderate	3	15.8%	11.0%	11.6%	7.8%	4	21.1%	17.4%	20.4%	15.6%
Middle	9	47.4%	51.4%	55.0%	51.9%	4	21.1%	17.3%	23.6%	22.3%
Upper	7	36.8%	37.7%	33.0%	39.4%	10	52.6%	62.5%	34.2%	45.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.7%	12.0%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.1%	0.1%	3	23.1%	17.2%	11.4%	6.6%
Moderate	0	0.0%	0.0%	11.5%	9.4%	3	23.1%	20.3%	19.5%	13.8%
Middle	8	61.5%	57.8%	59.9%	56.4%	3	23.1%	23.9%	24.2%	20.9%
Upper	5	38.5%	42.2%	28.5%	34.1%	4	30.8%	38.6%	33.7%	43.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.2%	15.0%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.3%	1.6%	7	58.3%	27.4%	20.9%	12.2%
Moderate	1	8.3%	2.4%	16.7%	13.9%	1	8.3%	20.2%	20.3%	12.0%
Middle	9	75.0%	79.0%	64.1%	55.3%	1	8.3%	8.1%	22.9%	18.8%
Upper	2	16.7%	18.5%	19.0%	29.2%	3	25.0%	44.4%	34.3%	55.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.6%	1.2%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	10.0%	23.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	100.0%	100.0%	40.0%	12.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	30.0%	27.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	15.0%	36.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	5.0%	0.3%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.4%	4.1%	11	23.9%	6.4%	10.5%	4.6%
Moderate	6	13.0%	28.5%	12.3%	9.2%	8	17.4%	14.2%	19.9%	12.6%
Middle	26	56.5%	41.7%	57.4%	49.5%	8	17.4%	14.8%	23.6%	18.4%
Upper	14	30.4%	29.8%	29.9%	37.2%	17	37.0%	41.5%	33.8%	38.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.3%	23.1%	12.2%	26.2%
Total	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	5.8%	6.6%	5.5%	7.9%
Moderate	6	11.5%	10.0%	11.9%	9.1%
Middle	29	55.8%	58.5%	50.0%	52.5%
Upper	14	26.9%	24.9%	29.6%	29.8%
Unknown	0	0.0%	0.0%	0.3%	0.1%
Tract Unknown	0	0.0%	0.0%	2.6%	0.6%
Total	*52*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*29*	55.8%	23.3%	44.6%	40.7%
	By Loan Size				
$100,000 or less	25	48.1%	9.3%	87.5%	25.9%
$100,001-$250,000	6	11.5%	8.5%	6.5%	19.8%
$250,001-$1 Million	21	40.4%	82.2%	6.0%	54.3%
Total	*52*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Williamsport, PA (MSA 48700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.5%	0.9%	0	0.0%	0.0%	8.7%	4.8%
Moderate	1	12.5%	5.4%	9.2%	5.1%	3	37.5%	44.3%	22.2%	17.6%
Middle	7	87.5%	94.6%	80.4%	81.1%	2	25.0%	27.3%	24.4%	22.9%
Upper	0	0.0%	0.0%	8.9%	12.9%	3	37.5%	28.5%	33.7%	45.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.0%	9.7%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.0%	0.6%	3	12.5%	6.6%	11.3%	6.2%
Moderate	2	8.3%	4.1%	6.5%	4.0%	9	37.5%	32.8%	20.4%	15.6%
Middle	19	79.2%	81.7%	85.2%	86.9%	2	8.3%	8.8%	24.8%	23.8%
Upper	3	12.5%	14.2%	7.4%	8.6%	8	33.3%	31.2%	36.9%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	8.3%	20.6%	6.6%	9.5%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.0%	1.1%	2	15.4%	9.2%	8.3%	4.2%
Moderate	2	15.4%	10.3%	5.4%	2.6%	4	30.8%	51.5%	14.4%	12.5%
Middle	8	61.5%	71.0%	83.7%	81.4%	3	23.1%	19.5%	24.4%	23.6%
Upper	3	23.1%	18.7%	9.9%	14.9%	3	23.1%	14.6%	48.1%	51.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	5.1%	4.8%	8.2%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	19.4%	8.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	36.1%	11.7%	0	0.0%	0.0%	2.8%	0.3%
Middle	0	0.0%	0.0%	44.4%	79.7%	0	0.0%	0.0%	2.8%	0.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.3%	5.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	86.1%	93.8%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.5%	1.4%	5	11.1%	5.3%	9.5%	4.8%
Moderate	5	11.1%	5.2%	8.1%	5.2%	16	35.6%	38.2%	20.4%	15.4%
Middle	34	75.6%	83.5%	82.1%	82.8%	7	15.6%	14.9%	24.3%	21.5%
Upper	6	13.3%	11.2%	8.3%	10.6%	14	31.1%	28.3%	36.2%	42.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	6.7%	13.4%	9.6%	16.2%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	3.4%	0.7%	4.1%	5.0%
Moderate	10	16.9%	16.1%	14.3%	17.5%
Middle	35	59.3%	61.2%	73.8%	67.4%
Upper	12	20.3%	22.1%	7.4%	9.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.4%	0.2%
Total	*59*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*28*	47.5%	14.1%	40.0%	27.2%
	By Loan Size				
$100,000 or less	25	42.4%	4.5%	90.2%	27.2%
$100,001-$250,000	10	16.9%	10.5%	4.9%	15.6%
$250,001-$1 Million	24	40.7%	85.0%	4.9%	57.2%
Total	*59*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Williamsport, PA (MSA 48700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.8%	1.1%	0	0.0%	0.0%	4.9%	2.8%
Moderate	3	27.3%	15.0%	10.1%	5.8%	2	18.2%	12.3%	20.3%	15.3%
Middle	7	63.6%	79.7%	80.3%	82.9%	3	27.3%	19.4%	24.5%	23.4%
Upper	1	9.1%	5.3%	7.8%	10.2%	5	45.5%	63.0%	36.5%	46.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	5.3%	13.7%	11.9%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	1.9%	1.5%	0	0.0%	0.0%	8.4%	4.8%
Moderate	0	0.0%	0.0%	7.0%	4.1%	0	0.0%	0.0%	16.1%	11.7%
Middle	6	60.0%	53.1%	82.1%	82.5%	0	0.0%	0.0%	22.1%	20.3%
Upper	4	40.0%	46.9%	9.0%	11.9%	6	60.0%	62.8%	38.9%	48.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	40.0%	37.2%	14.5%	15.1%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	2.0%	2.0%	2	20.0%	8.7%	6.3%	3.9%
Moderate	0	0.0%	0.0%	7.0%	6.1%	3	30.0%	21.7%	14.0%	11.8%
Middle	10	100.0%	100.0%	85.7%	86.3%	4	40.0%	58.7%	26.6%	20.8%
Upper	0	0.0%	0.0%	5.3%	5.6%	1	10.0%	10.9%	47.2%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.0%	7.5%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	15.4%	4.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.1%	23.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	61.5%	72.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.9%	1.4%	2	6.5%	0.1%	6.1%	3.4%
Moderate	3	9.7%	5.5%	8.9%	5.8%	5	16.1%	4.9%	18.1%	13.6%
Middle	23	74.2%	63.6%	81.4%	82.7%	7	22.6%	8.0%	24.0%	21.6%
Upper	5	16.1%	30.8%	7.8%	10.1%	12	38.7%	62.2%	38.4%	46.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	16.1%	24.9%	13.4%	15.1%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	4.4%	3.9%
Moderate	8	29.6%	14.4%	15.3%	24.1%
Middle	15	55.6%	72.0%	72.0%	64.8%
Upper	4	14.8%	13.6%	7.9%	7.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.4%	0.1%
Total	*27*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*8*	29.6%	3.3%	39.8%	29.0%
	By Loan Size				
$100,000 or less	8	29.6%	2.9%	90.8%	28.4%
$100,001-$250,000	4	14.8%	5.7%	4.6%	17.0%
$250,001-$1 Million	15	55.6%	91.4%	4.6%	54.5%
Total	*27*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Williamsport, PA (MSA 48700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	5.9%	1.3%	1.5%	0.8%	1	5.9%	2.2%	5.1%	2.7%
Moderate	0	0.0%	0.0%	4.0%	2.2%	2	11.8%	7.6%	17.3%	12.3%
Middle	14	82.4%	54.1%	86.5%	84.2%	4	23.5%	18.9%	25.8%	24.2%
Upper	2	11.8%	44.6%	8.0%	12.7%	4	23.5%	53.8%	40.5%	51.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	35.3%	17.5%	11.2%	9.8%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.5%	0.4%	0	0.0%	0.0%	5.1%	2.4%
Moderate	0	0.0%	0.0%	1.4%	1.0%	0	0.0%	0.0%	14.3%	10.1%
Middle	10	71.4%	59.7%	88.1%	85.3%	0	0.0%	0.0%	22.1%	18.2%
Upper	4	28.6%	40.3%	9.9%	13.3%	6	42.9%	61.0%	42.9%	51.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	57.1%	39.0%	15.6%	17.9%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.4%	1.9%	3	30.0%	17.5%	6.0%	2.6%
Moderate	0	0.0%	0.0%	3.9%	1.5%	1	10.0%	20.6%	16.8%	10.2%
Middle	10	100.0%	100.0%	88.8%	91.2%	4	40.0%	30.2%	22.1%	18.5%
Upper	0	0.0%	0.0%	6.0%	5.5%	2	20.0%	31.7%	50.2%	60.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.9%	8.6%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	15.4%	3.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	7.7%	3.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	100.0%	76.9%	92.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	2.2%	0.4%	1.2%	0.8%	4	8.9%	0.8%	5.2%	2.5%
Moderate	0	0.0%	0.0%	3.1%	1.8%	3	6.7%	2.7%	16.0%	10.9%
Middle	38	84.4%	75.6%	87.3%	85.3%	8	17.8%	6.5%	23.8%	20.6%
Upper	6	13.3%	23.9%	8.5%	12.1%	12	26.7%	31.9%	42.3%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	40.0%	58.1%	12.6%	16.4%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	2.9%	0.3%	2.9%	1.0%
Moderate	0	0.0%	0.0%	3.6%	5.8%
Middle	19	54.3%	40.8%	85.2%	70.5%
Upper	15	42.9%	58.9%	8.3%	22.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*35*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*9*	25.7%	4.8%	39.4%	28.4%
	By Loan Size				
$100,000 or less	9	25.7%	2.0%	92.5%	30.1%
$100,001-$250,000	4	11.4%	4.1%	3.0%	10.8%
$250,001-$1 Million	22	62.9%	93.9%	4.5%	59.1%
Total	*35*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Williamsport, PA (MSA 48700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.2%	0.8%	0	0.0%	0.0%	7.9%	4.8%
Moderate	0	0.0%	0.0%	3.3%	2.1%	4	23.5%	13.3%	21.5%	16.2%
Middle	15	88.2%	87.7%	87.1%	85.7%	5	29.4%	33.8%	24.2%	22.9%
Upper	2	11.8%	12.3%	8.4%	11.4%	5	29.4%	36.7%	32.0%	43.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	17.6%	16.2%	14.3%	12.9%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.5%	0.4%	0	0.0%	0.0%	7.5%	4.0%
Moderate	0	0.0%	0.0%	2.3%	1.5%	2	25.0%	10.0%	16.8%	11.2%
Middle	6	75.0%	60.6%	89.0%	86.1%	2	25.0%	13.3%	21.3%	19.3%
Upper	2	25.0%	39.4%	8.3%	12.1%	4	50.0%	76.6%	41.1%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.3%	15.7%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	9.1%	6.6%	2.0%	0.9%	4	36.4%	22.4%	9.6%	3.1%
Moderate	0	0.0%	0.0%	3.1%	2.0%	5	45.5%	44.7%	22.2%	12.6%
Middle	10	90.9%	93.4%	87.4%	84.2%	1	9.1%	13.2%	25.9%	25.4%
Upper	0	0.0%	0.0%	7.5%	13.0%	1	9.1%	19.7%	38.6%	53.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	5.6%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	21.4%	6.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	21.4%	4.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	57.1%	89.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	1	2.8%	0.1%	1.2%	1.0%	4	11.1%	0.4%	7.9%	4.2%
Moderate	0	0.0%	0.0%	3.0%	2.0%	11	30.6%	12.4%	19.9%	13.5%
Middle	31	86.1%	75.9%	87.6%	85.9%	8	22.2%	24.4%	23.3%	20.7%
Upper	4	11.1%	24.0%	8.2%	11.1%	10	27.8%	53.9%	35.6%	43.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	8.3%	8.8%	13.2%	18.2%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	3.6%	0.3%	2.1%	0.8%
Moderate	2	3.6%	2.1%	3.3%	4.5%
Middle	38	67.9%	55.7%	84.4%	75.5%
Upper	14	25.0%	41.9%	8.9%	18.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.2%	0.3%
Total	*56*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*24*	42.9%	18.1%	39.7%	32.8%
	By Loan Size				
$100,000 or less	22	39.3%	4.6%	91.7%	33.0%
$100,001-$250,000	8	14.3%	6.4%	3.9%	14.0%
$250,001-$1 Million	26	46.4%	89.0%	4.3%	53.0%
Total	*56*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Williamsport, PA (MSA 48700)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	10.0%	2.7%	1.5%	0.8%	0	0.0%	0.0%	5.3%	2.8%
Moderate	2	10.0%	4.8%	5.0%	3.3%	5	25.0%	17.2%	18.2%	13.2%
Middle	15	75.0%	84.1%	83.3%	80.6%	6	30.0%	18.9%	24.1%	21.2%
Upper	1	5.0%	8.3%	10.2%	15.4%	5	25.0%	28.2%	39.5%	50.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	20.0%	35.7%	12.9%	12.4%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	9.1%	3.5%	1.9%	1.4%	0	0.0%	0.0%	6.5%	3.2%
Moderate	0	0.0%	0.0%	2.6%	1.3%	2	18.2%	19.5%	17.8%	12.4%
Middle	8	72.7%	73.9%	86.2%	84.6%	1	9.1%	7.3%	23.4%	20.4%
Upper	2	18.2%	22.5%	9.2%	12.7%	1	9.1%	9.5%	39.7%	47.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	63.6%	63.6%	12.6%	16.9%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	6.7%	1.0%	0.9%	0.3%	2	13.3%	32.2%	5.5%	2.8%
Moderate	0	0.0%	0.0%	2.4%	12.5%	2	13.3%	4.5%	15.2%	9.0%
Middle	12	80.0%	88.7%	88.5%	76.0%	5	33.3%	11.6%	27.6%	21.6%
Upper	2	13.3%	10.3%	8.2%	11.2%	5	33.3%	20.9%	47.6%	51.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	6.7%	30.8%	4.2%	14.9%
Total	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	23.8%	49.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.8%	4.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	47.6%	42.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	4.8%	3.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	4	8.7%	2.8%	1.8%	3.2%	2	4.3%	2.4%	5.7%	2.8%
Moderate	2	4.3%	3.1%	4.0%	3.4%	9	19.6%	17.0%	17.5%	12.0%
Middle	35	76.1%	81.5%	84.7%	79.8%	12	26.1%	15.0%	24.1%	20.0%
Upper	5	10.9%	12.5%	9.5%	13.6%	11	23.9%	22.3%	40.3%	47.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	26.1%	43.3%	12.4%	18.2%
Total	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	11.1%	6.6%	2.8%	3.9%
Moderate	1	2.2%	1.8%	4.4%	5.2%
Middle	32	71.1%	78.4%	81.7%	83.3%
Upper	7	15.6%	13.2%	9.3%	7.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.9%	0.3%
Total	*45*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*17*	37.8%	23.4%	39.1%	36.0%
	By Loan Size				
$100,000 or less	19	42.2%	6.1%	91.6%	32.7%
$100,001-$250,000	8	17.8%	11.9%	4.5%	18.4%
$250,001-$1 Million	18	40.0%	82.1%	3.9%	48.8%
Total	*45*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	4	15.4%	10.5%	5.3%	2.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	8	30.8%	26.0%	20.8%	15.5%
Middle	21	80.8%	75.8%	85.7%	84.7%	10	38.5%	44.2%	26.8%	25.1%
Upper	5	19.2%	24.2%	14.3%	15.3%	4	15.4%	19.3%	32.5%	42.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.5%	14.0%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	4	11.1%	4.8%	9.9%	5.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	6	16.7%	13.0%	18.4%	13.4%
Middle	32	88.9%	81.9%	89.9%	89.8%	10	27.8%	27.7%	28.3%	27.5%
Upper	4	11.1%	18.1%	10.1%	10.2%	15	41.7%	51.5%	37.1%	45.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.8%	3.0%	6.4%	8.6%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	5.6%	11.4%	6.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	2.2%	10.7%	5.8%
Middle	11	100.0%	100.0%	90.0%	91.0%	3	27.3%	11.1%	25.7%	18.5%
Upper	0	0.0%	0.0%	10.0%	9.0%	5	45.5%	72.7%	50.7%	68.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	9.1%	8.3%	1.4%	1.3%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	25.0%	5.7%
Middle	0	0.0%	0.0%	75.0%	92.5%	0	0.0%	0.0%	25.0%	10.5%
Upper	0	0.0%	0.0%	25.0%	7.5%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	50.0%	83.8%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	9	12.3%	7.1%	7.3%	3.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	15	20.5%	16.7%	19.0%	14.3%
Middle	64	87.7%	81.8%	87.4%	86.5%	23	31.5%	32.0%	27.1%	25.2%
Upper	9	12.3%	18.2%	12.6%	13.5%	24	32.9%	41.7%	35.8%	44.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	2.7%	2.5%	10.8%	12.7%
Total	*73*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*73*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	25	96.2%	73.7%	81.6%	81.0%
Upper	1	3.8%	26.3%	16.8%	18.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.6%	0.4%
Total	*26*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*19*	73.1%	33.8%	40.9%	34.2%
	By Loan Size				
$100,000 or less	20	76.9%	12.0%	90.2%	35.0%
$100,001-$250,000	3	11.5%	15.8%	6.2%	23.5%
$250,001-$1 Million	3	11.5%	72.2%	3.6%	41.5%
Total	*26*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	4	14.3%	10.1%	2.9%	1.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	8	28.6%	25.9%	16.8%	12.7%
Middle	26	92.9%	91.3%	86.4%	85.9%	9	32.1%	34.5%	25.2%	23.6%
Upper	2	7.1%	8.7%	13.6%	14.1%	6	21.4%	24.6%	37.5%	44.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.6%	4.8%	17.6%	17.6%
Total	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	7.7%	2.4%	8.1%	5.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	23.1%	16.5%	17.9%	12.6%
Middle	9	69.2%	58.4%	86.0%	83.3%	1	7.7%	3.2%	24.6%	22.4%
Upper	4	30.8%	41.6%	14.0%	16.7%	8	61.5%	78.0%	36.6%	45.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.8%	13.4%
Total	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.7%	2.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	4	57.1%	46.8%	20.5%	15.1%
Middle	7	100.0%	100.0%	84.0%	82.1%	3	42.9%	53.2%	25.4%	23.9%
Upper	0	0.0%	0.0%	16.0%	17.9%	0	0.0%	0.0%	43.0%	57.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.4%	1.5%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	10.4%	7.3%	5.6%	2.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	15	31.3%	23.0%	17.6%	12.6%
Middle	42	87.5%	80.2%	85.9%	85.1%	13	27.1%	24.1%	25.0%	22.9%
Upper	6	12.5%	19.8%	14.1%	14.9%	14	29.2%	42.6%	38.1%	45.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.1%	3.1%	13.7%	16.7%
Total	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*48*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	10	90.9%	93.1%	84.0%	86.5%
Upper	1	9.1%	6.9%	14.6%	13.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.5%
Total	*11*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*7*	63.6%	30.6%	47.2%	34.7%
	By Loan Size				
$100,000 or less	8	72.7%	31.0%	89.1%	30.5%
$100,001-$250,000	2	18.2%	29.6%	6.4%	22.7%
$250,001-$1 Million	1	9.1%	39.4%	4.5%	46.8%
Total	*11*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.6%	1.7%
Moderate	2	10.5%	9.0%	5.1%	3.9%	4	21.1%	18.7%	15.2%	10.8%
Middle	17	89.5%	91.0%	94.9%	96.1%	7	36.8%	42.7%	24.8%	22.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	10.5%	17.5%	41.5%	50.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	31.6%	21.1%	15.0%	14.5%
Total	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	3	17.6%	11.3%	5.3%	2.8%
Moderate	0	0.0%	0.0%	6.1%	5.1%	1	5.9%	7.6%	12.2%	9.1%
Middle	17	100.0%	100.0%	93.9%	94.9%	2	11.8%	9.6%	24.2%	21.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	7	41.2%	59.9%	41.0%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	23.5%	11.6%	17.2%	18.5%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.9%	2.4%
Moderate	0	0.0%	0.0%	12.1%	9.0%	4	66.7%	72.7%	20.0%	11.0%
Middle	6	100.0%	100.0%	87.9%	91.0%	1	16.7%	18.2%	27.6%	25.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	9.1%	44.5%	59.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.1%	1.9%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	7.1%	5.4%	4.6%	2.1%
Moderate	2	4.8%	4.6%	6.7%	4.7%	9	21.4%	14.1%	15.0%	10.1%
Middle	40	95.2%	95.4%	93.3%	95.3%	10	23.8%	26.8%	25.1%	22.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	10	23.8%	37.5%	41.8%	50.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	23.8%	16.4%	13.5%	15.3%
Total	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	6.9%	12.2%
Middle	25	100.0%	100.0%	92.6%	87.8%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.5%	0.0%
Total	*25*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*18*	72.0%	48.5%	42.0%	28.7%
	By Loan Size				
$100,000 or less	13	52.0%	7.2%	89.7%	27.4%
$100,001-$250,000	4	16.0%	13.2%	6.2%	23.2%
$250,001-$1 Million	8	32.0%	79.5%	4.2%	49.4%
Total	*25*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.4%	1.6%
Moderate	0	0.0%	0.0%	1.8%	1.3%	0	0.0%	0.0%	17.0%	12.2%
Middle	5	100.0%	100.0%	98.2%	98.7%	3	60.0%	69.1%	25.3%	23.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	22.8%	38.6%	48.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	8.1%	15.6%	13.8%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	12.4%	4.3%	1.9%
Moderate	0	0.0%	0.0%	6.4%	4.8%	0	0.0%	0.0%	11.7%	7.8%
Middle	5	100.0%	100.0%	93.6%	95.2%	2	40.0%	42.4%	27.1%	23.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	22.9%	42.1%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	22.3%	14.8%	17.5%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	23.8%	2.9%	9.8%	3.1%
Moderate	0	0.0%	0.0%	7.2%	3.4%	5	23.8%	17.6%	20.0%	11.0%
Middle	21	100.0%	100.0%	92.8%	96.6%	7	33.3%	14.9%	31.3%	22.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	19.0%	64.6%	36.2%	56.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.6%	6.9%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	16.7%	4.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	83.3%	95.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	6	19.4%	4.7%	5.0%	1.8%
Moderate	0	0.0%	0.0%	4.4%	2.8%	5	16.1%	6.6%	15.8%	10.3%
Middle	31	100.0%	100.0%	95.6%	97.2%	12	38.7%	41.1%	27.0%	23.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	6	19.4%	38.4%	39.1%	49.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.5%	9.2%	13.1%	15.6%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	8.3%	6.1%
Middle	17	100.0%	100.0%	88.2%	93.1%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.5%	0.8%
Total	*17*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*9*	52.9%	13.4%	45.1%	34.7%
	By Loan Size				
$100,000 or less	7	41.2%	4.3%	87.7%	24.5%
$100,001-$250,000	4	23.5%	15.6%	6.2%	17.8%
$250,001-$1 Million	6	35.3%	80.1%	6.1%	57.7%
Total	*17*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group A

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.5%	1.8%
Moderate	0	0.0%	0.0%	4.0%	3.8%	2	20.0%	17.8%	18.5%	13.7%
Middle	10	100.0%	100.0%	96.0%	96.2%	5	50.0%	38.7%	25.4%	23.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	20.0%	37.7%	42.5%	51.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	5.8%	10.1%	9.6%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	2.5%
Moderate	0	0.0%	0.0%	4.0%	2.6%	1	20.0%	22.7%	14.3%	10.7%
Middle	5	100.0%	100.0%	96.0%	97.4%	3	60.0%	53.5%	23.6%	20.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	23.8%	43.2%	48.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	14.6%	17.5%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	35.7%	18.1%	8.0%	2.2%
Moderate	0	0.0%	0.0%	8.8%	5.7%	2	14.3%	5.6%	13.1%	6.1%
Middle	14	100.0%	100.0%	91.2%	94.3%	3	21.4%	7.6%	32.7%	23.8%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	28.6%	68.7%	45.0%	66.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.2%	1.7%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	5	17.2%	2.7%	4.6%	2.0%
Moderate	0	0.0%	0.0%	5.0%	3.5%	5	17.2%	17.6%	16.1%	11.8%
Middle	29	100.0%	100.0%	95.0%	96.5%	11	37.9%	38.9%	26.3%	21.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	7	24.1%	37.8%	43.1%	50.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	3.4%	3.0%	9.9%	13.7%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	7.8%	9.5%
Middle	16	100.0%	100.0%	83.7%	89.3%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	8.5%	1.2%
Total	*16*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*8*	50.0%	18.0%	42.3%	31.6%
	By Loan Size				
$100,000 or less	7	43.8%	6.0%	88.2%	25.0%
$100,001-$250,000	5	31.3%	19.6%	6.2%	18.6%
$250,001-$1 Million	4	25.0%	74.5%	5.6%	56.4%
Total	*16*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	6	11.3%	5.2%	6.5%	3.0%
Moderate	9	17.0%	8.5%	8.2%	5.2%	19	35.8%	22.9%	22.3%	15.0%
Middle	33	62.3%	59.9%	67.2%	63.0%	14	26.4%	22.6%	24.4%	22.5%
Upper	10	18.9%	28.2%	24.5%	31.7%	13	24.5%	47.9%	32.9%	46.5%
Unknown	1	1.9%	3.5%	0.0%	0.1%	1	1.9%	1.5%	13.8%	13.0%
Total	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	18	11.5%	6.2%	6.6%	3.4%
Moderate	7	4.5%	3.0%	5.3%	3.3%	34	21.7%	14.4%	19.6%	14.6%
Middle	97	61.8%	55.3%	71.7%	69.1%	34	21.7%	22.0%	24.9%	22.9%
Upper	53	33.8%	41.7%	23.0%	27.6%	66	42.0%	53.2%	41.7%	49.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	3.2%	4.1%	7.3%	9.5%
Total	*157*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*157*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	6	11.3%	4.9%	8.5%	5.6%
Moderate	5	9.4%	4.0%	5.9%	6.1%	9	17.0%	14.8%	13.4%	11.3%
Middle	37	69.8%	66.6%	75.7%	74.4%	17	32.1%	27.5%	25.1%	20.8%
Upper	11	20.8%	29.4%	18.4%	19.5%	21	39.6%	52.8%	50.6%	58.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.4%	4.0%
Total	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*53*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	0.6%
Moderate	0	0.0%	0.0%	24.3%	21.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	56.8%	62.7%	0	0.0%	0.0%	2.7%	1.1%
Upper	0	0.0%	0.0%	18.9%	16.3%	0	0.0%	0.0%	21.6%	17.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	73.0%	81.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	30	11.4%	5.8%	6.7%	3.2%
Moderate	21	8.0%	4.7%	7.1%	5.0%	62	23.6%	16.9%	20.3%	14.4%
Middle	167	63.5%	58.1%	69.5%	65.4%	65	24.7%	22.9%	24.5%	22.1%
Upper	74	28.1%	36.2%	23.4%	29.5%	100	38.0%	51.6%	37.5%	47.3%
Unknown	1	0.4%	1.0%	0.0%	0.0%	6	2.3%	2.8%	10.9%	13.0%
Total	*263*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*263*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	34	15.3%	12.1%	10.8%	6.8%
Middle	131	59.0%	52.7%	65.5%	63.1%
Upper	57	25.7%	35.3%	21.5%	29.5%
Unknown	0	0.0%	0.0%	0.2%	0.1%
Tract Unknown	0	0.0%	0.0%	1.9%	0.5%
Total	*222*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*129*	58.1%	20.5%	43.7%	32.1%
	By Loan Size				
$100,000 or less	159	71.6%	14.2%	92.8%	35.5%
$100,001-$250,000	21	9.5%	11.9%	3.9%	17.2%
$250,001-$1 Million	42	18.9%	73.9%	3.3%	47.4%
Total	*222*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.5%	0.7%	5.4%	2.4%
Moderate	3	7.5%	3.7%	7.3%	4.4%	10	25.0%	15.8%	20.6%	13.4%
Middle	31	77.5%	69.9%	67.2%	63.3%	6	15.0%	10.0%	25.1%	23.1%
Upper	6	15.0%	26.4%	25.5%	32.3%	21	52.5%	70.5%	35.1%	49.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.0%	3.0%	13.8%	11.8%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	2	6.5%	4.5%	5.6%	2.5%
Moderate	1	3.2%	1.9%	5.1%	3.1%	3	9.7%	6.2%	17.6%	12.2%
Middle	24	77.4%	74.5%	72.6%	70.4%	11	35.5%	27.2%	19.7%	17.4%
Upper	6	19.4%	23.6%	22.4%	26.5%	12	38.7%	50.0%	42.0%	52.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	9.7%	12.0%	15.2%	15.7%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	22	23.7%	14.2%	10.5%	2.7%
Moderate	13	14.0%	11.4%	9.2%	3.8%	22	23.7%	19.3%	16.0%	8.6%
Middle	65	69.9%	58.7%	68.9%	69.3%	28	30.1%	32.6%	26.3%	21.1%
Upper	15	16.1%	29.9%	21.9%	26.9%	20	21.5%	33.2%	43.3%	59.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.1%	0.7%	3.9%	8.0%
Total	*93*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*93*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	16.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	65.0%	70.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	10.0%	12.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	25	15.2%	3.2%	6.1%	2.4%
Moderate	17	10.4%	3.6%	6.9%	4.1%	35	21.3%	12.4%	19.0%	12.6%
Middle	120	73.2%	70.8%	69.0%	66.0%	45	27.4%	18.4%	23.5%	20.8%
Upper	27	16.5%	25.6%	24.0%	29.9%	53	32.3%	59.7%	38.0%	50.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	3.7%	6.2%	13.3%	14.1%
Total	*164*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*164*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	19	13.4%	17.1%	11.8%	11.1%
Middle	77	54.2%	38.6%	64.6%	57.5%
Upper	46	32.4%	44.3%	22.4%	31.0%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	1.0%	0.4%
Total	*142*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*75*	52.8%	21.8%	47.6%	33.1%
	By Loan Size				
$100,000 or less	76	53.5%	10.0%	92.1%	33.6%
$100,001-$250,000	25	17.6%	13.9%	4.1%	16.4%
$250,001-$1 Million	41	28.9%	76.1%	3.8%	49.9%
Total	*142*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.1%	0.1%	2	4.1%	2.4%	5.1%	2.1%
Moderate	5	10.2%	5.2%	6.5%	3.1%	14	28.6%	16.7%	18.2%	12.0%
Middle	30	61.2%	55.8%	62.8%	57.3%	12	24.5%	26.3%	26.3%	23.1%
Upper	14	28.6%	39.0%	30.6%	39.4%	14	28.6%	42.6%	34.0%	48.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	14.3%	12.0%	16.4%	14.4%
Total	*49*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*49*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	1.9%
Moderate	1	2.4%	1.2%	3.6%	2.0%	7	17.1%	15.4%	13.3%	8.5%
Middle	25	61.0%	59.5%	60.1%	57.3%	9	22.0%	23.0%	18.8%	14.6%
Upper	15	36.6%	39.3%	36.3%	40.6%	14	34.1%	41.4%	43.6%	52.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	11	26.8%	20.2%	20.4%	22.8%
Total	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*41*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	16	19.5%	10.5%	6.9%	1.4%
Moderate	13	15.9%	15.3%	6.1%	1.7%	22	26.8%	27.3%	15.9%	8.9%
Middle	52	63.4%	57.8%	67.5%	62.0%	27	32.9%	34.4%	24.6%	18.1%
Upper	17	20.7%	26.9%	26.4%	36.3%	17	20.7%	27.8%	48.6%	67.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.0%	4.5%
Total	*82*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*82*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	14.3%	4.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	100.0%	100.0%	64.3%	92.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	21.4%	2.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.1%	18	10.3%	1.3%	4.9%	1.9%
Moderate	19	10.9%	2.9%	5.4%	2.7%	43	24.6%	12.3%	16.2%	10.0%
Middle	110	62.9%	68.7%	62.5%	59.1%	48	27.4%	18.6%	23.4%	18.7%
Upper	46	26.3%	28.3%	32.0%	38.1%	45	25.7%	30.4%	39.1%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	12.0%	37.4%	16.4%	20.6%
Total	*175*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*175*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.1%	0.0%
Moderate	9	6.4%	4.5%	9.8%	7.3%
Middle	78	55.7%	52.5%	60.3%	57.0%
Upper	53	37.9%	43.0%	29.7%	35.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*140*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*81*	57.9%	29.7%	44.2%	32.7%
	By Loan Size				
$100,000 or less	78	55.7%	12.6%	93.5%	39.0%
$100,001-$250,000	25	17.9%	16.2%	3.4%	15.8%
$250,001-$1 Million	37	26.4%	71.2%	3.1%	45.2%
Total	*140*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
		Bank		Aggregate			Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	1	1.1%	0.8%	0.7%	0.4%	6	6.3%	2.7%	6.9%	4.1%
Moderate	2	2.1%	0.8%	0.6%	0.4%	20	21.1%	15.1%	24.8%	19.0%
Middle	83	87.4%	87.5%	79.9%	75.9%	31	32.6%	31.4%	24.1%	23.0%
Upper	9	9.5%	10.8%	18.7%	23.3%	28	29.5%	44.1%	29.6%	41.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	10.5%	6.8%	14.6%	12.5%
Total	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*95*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.8%	0.4%	0	0.0%	0.0%	6.1%	3.4%
Moderate	0	0.0%	0.0%	0.2%	0.1%	5	20.8%	12.9%	15.4%	10.4%
Middle	10	41.7%	38.7%	75.9%	72.4%	5	20.8%	14.8%	23.0%	19.2%
Upper	14	58.3%	61.3%	23.1%	27.1%	9	37.5%	54.2%	44.7%	55.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	20.8%	18.1%	10.8%	12.0%
Total	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	7.7%	5.5%	0.9%	0.4%	3	11.5%	32.8%	11.7%	4.9%
Moderate	0	0.0%	0.0%	0.9%	1.6%	8	30.8%	18.2%	25.1%	14.5%
Middle	19	73.1%	71.1%	78.3%	72.6%	9	34.6%	28.1%	25.5%	22.7%
Upper	5	19.2%	23.3%	20.0%	25.5%	6	23.1%	20.9%	35.9%	55.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.8%	2.3%
Total	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	6.7%	0.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	6.7%	18.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	73.3%	75.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	13.3%	5.6%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	2.1%	0.7%	0.8%	0.4%	9	6.2%	2.3%	7.7%	3.8%
Moderate	2	1.4%	0.6%	0.6%	1.0%	33	22.6%	12.8%	22.4%	15.6%
Middle	113	77.4%	79.9%	78.5%	74.7%	45	30.8%	24.3%	24.0%	21.1%
Upper	28	19.2%	18.9%	20.1%	23.9%	43	29.5%	39.9%	34.6%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	11.0%	20.6%	11.3%	14.8%
Total	*146*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*146*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
		Bank		Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	7.8%	9.6%	3.2%	5.2%
Moderate	0	0.0%	0.0%	1.3%	0.6%
Middle	51	79.7%	69.1%	73.5%	75.2%
Upper	8	12.5%	21.4%	18.7%	17.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.3%	1.2%
Total	*64*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*41*	64.1%	37.9%	47.8%	43.1%
	By Loan Size				
$100,000 or less	36	56.3%	12.1%	91.5%	36.9%
$100,001-$250,000	13	20.3%	19.1%	5.1%	21.0%
$250,001-$1 Million	15	23.4%	68.8%	3.5%	42.0%
Total	*64*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	6	9.2%	5.8%	7.1%	3.4%
Moderate	5	7.7%	3.1%	8.1%	4.0%	13	20.0%	14.2%	20.5%	13.5%
Middle	41	63.1%	56.0%	61.0%	56.9%	11	16.9%	15.3%	22.0%	20.2%
Upper	19	29.2%	40.9%	30.9%	39.1%	26	40.0%	54.3%	34.0%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	13.8%	10.4%	16.5%	14.9%
Total	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*65*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	4.3%	3.0%	5.8%	3.4%
Moderate	0	0.0%	0.0%	4.6%	2.5%	1	4.3%	2.7%	15.8%	10.7%
Middle	16	69.6%	62.9%	64.4%	59.4%	3	13.0%	11.9%	22.0%	17.9%
Upper	7	30.4%	37.1%	31.0%	38.1%	11	47.8%	59.3%	41.2%	49.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	30.4%	23.1%	15.2%	18.1%
Total	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	12	12.8%	7.2%	9.4%	3.9%
Moderate	11	11.7%	9.5%	8.3%	4.5%	24	25.5%	21.1%	16.7%	9.2%
Middle	61	64.9%	67.5%	63.5%	61.2%	26	27.7%	25.7%	22.9%	17.4%
Upper	22	23.4%	23.1%	28.2%	34.3%	31	33.0%	42.4%	48.2%	67.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.1%	3.5%	2.7%	2.0%
Total	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*94*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	19.2%	12.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	61.5%	61.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	19.2%	26.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	19	10.4%	5.2%	6.9%	3.4%
Moderate	16	8.7%	2.8%	7.0%	3.6%	38	20.8%	11.8%	18.3%	12.1%
Middle	119	65.0%	58.8%	62.5%	58.1%	40	21.9%	15.1%	22.0%	19.0%
Upper	48	26.2%	38.4%	30.5%	38.3%	68	37.2%	54.2%	38.2%	49.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	9.8%	13.7%	14.6%	16.5%
Total	*183*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*183*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.1%	0.0%
Moderate	15	7.7%	9.7%	8.8%	7.6%
Middle	101	51.8%	43.7%	57.4%	54.2%
Upper	79	40.5%	46.6%	30.0%	37.6%
Unknown	0	0.0%	0.0%	0.1%	0.0%
Tract Unknown	0	0.0%	0.0%	3.7%	0.6%
Total	*195*	100.0%	100.0%	100.0%	100.0%
			By Revenue		
$1 Million or Less	*107*	54.9%	26.4%	43.6%	36.2%
			By Loan Size		
$100,000 or less	114	58.5%	12.5%	90.9%	28.1%
$100,001-$250,000	39	20.0%	20.8%	4.2%	15.6%
$250,001-$1 Million	42	21.5%	66.6%	4.8%	56.3%
Total	*195*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group C

Income Categories	HMDA By Tract Income					HMDA By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.0%	3.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	25.4%	20.5%
Middle	7	87.5%	91.2%	91.9%	88.4%	4	50.0%	45.9%	23.1%	21.9%
Upper	1	12.5%	8.8%	8.1%	11.6%	4	50.0%	54.1%	28.9%	37.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	16.5%	17.3%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	1	5.9%	4.6%	8.3%	4.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	17.6%	16.7%	18.5%	13.8%
Middle	17	100.0%	100.0%	95.8%	95.8%	4	23.5%	20.8%	27.5%	23.2%
Upper	0	0.0%	0.0%	4.2%	4.2%	6	35.3%	43.1%	39.4%	50.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	17.6%	14.8%	6.3%	7.6%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	22.2%	12.6%	12.3%	8.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	19.4%	13.3%
Middle	9	100.0%	100.0%	94.2%	89.8%	3	33.3%	40.9%	28.4%	24.9%
Upper	0	0.0%	0.0%	5.8%	10.2%	3	33.3%	38.7%	33.5%	45.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	11.1%	7.9%	6.5%	8.4%
Total	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.5%	0.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.5%	1.4%
Middle	0	0.0%	0.0%	87.5%	97.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	12.5%	3.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	75.0%	98.1%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	8.8%	3.6%	7.8%	3.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	8.8%	7.1%	21.8%	16.8%
Middle	33	97.1%	96.1%	93.7%	91.5%	11	32.4%	34.6%	25.4%	21.4%
Upper	1	2.9%	3.9%	6.3%	8.5%	13	38.2%	47.5%	33.4%	40.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	11.8%	7.3%	11.6%	17.5%
Total	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*34*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	44	97.8%	99.6%	93.3%	97.7%
Upper	1	2.2%	0.4%	5.3%	1.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.4%	0.5%
Total	*45*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*24*	53.3%	21.7%	52.1%	41.7%
	By Loan Size				
$100,000 or less	36	80.0%	24.1%	92.0%	40.1%
$100,001-$250,000	5	11.1%	18.6%	6.0%	26.8%
$250,001-$1 Million	4	8.9%	57.3%	2.0%	33.1%
Total	*45*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan New York - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	6	20.7%	10.4%	3.7%	1.8%
Moderate	3	10.3%	8.1%	10.9%	9.8%	4	13.8%	9.3%	12.8%	8.3%
Middle	18	62.1%	50.6%	64.7%	63.4%	7	24.1%	24.4%	21.2%	18.2%
Upper	8	27.6%	41.3%	24.4%	26.8%	10	34.5%	38.9%	51.9%	60.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.9%	17.1%	10.3%	10.9%
Total	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.7%	2.5%
Moderate	0	0.0%	0.0%	9.8%	7.7%	1	25.0%	14.2%	11.1%	6.8%
Middle	4	100.0%	100.0%	67.9%	70.5%	2	50.0%	59.8%	20.9%	18.3%
Upper	0	0.0%	0.0%	22.3%	21.8%	1	25.0%	25.9%	40.9%	48.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	23.3%	23.5%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	40.5%	10.3%	0.8%
Moderate	1	25.0%	23.8%	8.4%	1.9%	0	0.0%	0.0%	10.3%	1.9%
Middle	2	50.0%	40.5%	75.7%	24.1%	0	0.0%	0.0%	29.0%	9.1%
Upper	1	25.0%	35.7%	15.9%	74.0%	2	50.0%	59.5%	43.9%	19.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.5%	68.9%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	50.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	42.4%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	7.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	8	21.6%	9.0%	4.3%	1.9%
Moderate	4	10.8%	6.9%	10.4%	9.0%	5	13.5%	10.0%	12.0%	7.3%
Middle	24	64.9%	58.8%	66.6%	62.0%	9	24.3%	30.1%	21.8%	17.4%
Upper	9	24.3%	34.2%	23.0%	29.0%	13	35.1%	37.0%	48.0%	54.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.4%	14.0%	13.8%	19.3%
Total	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*37*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	24.6%	27.0%
Middle	5	83.3%	94.6%	51.3%	46.1%
Upper	1	16.7%	5.4%	18.8%	24.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	5.3%	2.7%
Total	*6*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*5*	83.3%	72.8%	52.9%	36.2%
	By Loan Size				
$100,000 or less	6	100.0%	100.0%	97.2%	52.4%
$100,001-$250,000	0	0.0%	0.0%	1.2%	8.8%
$250,001-$1 Million	0	0.0%	0.0%	1.5%	38.8%
Total	*6*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	3.2%	5.7%	3.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	20.2%	14.3%
Middle	6	100.0%	100.0%	100.0%	100.0%	3	50.0%	51.4%	24.2%	23.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	18.0%	29.7%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	16.7%	27.3%	20.2%	20.0%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.3%	1.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	5.6%	3.6%	14.7%	8.6%
Middle	18	100.0%	100.0%	100.0%	100.0%	1	5.6%	6.2%	24.6%	18.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	8	44.4%	62.4%	37.0%	46.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	44.4%	27.8%	19.4%	24.5%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	6	30.0%	27.0%	14.0%	3.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	6	30.0%	27.0%	18.0%	7.7%
Middle	20	100.0%	100.0%	100.0%	100.0%	4	20.0%	17.0%	27.0%	24.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	20.0%	28.9%	38.2%	56.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	7.6%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	7	15.9%	2.3%	6.4%	2.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	7	15.9%	3.9%	17.6%	11.2%
Middle	44	100.0%	100.0%	100.0%	100.0%	8	18.2%	18.5%	24.7%	21.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	13	29.5%	49.1%	33.9%	43.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	20.5%	26.2%	17.4%	21.8%
Total	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	30	100.0%	100.0%	100.0%	100.0%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*30*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*20*	66.7%	31.4%	54.8%	49.3%
	By Loan Size				
$100,000 or less	18	60.0%	13.1%	90.1%	34.3%
$100,001-$250,000	7	23.3%	26.5%	6.4%	25.0%
$250,001-$1 Million	5	16.7%	60.4%	3.5%	40.7%
Total	*30*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	3.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	22.1%	16.1%
Middle	5	100.0%	100.0%	100.0%	100.0%	1	20.0%	11.6%	26.5%	24.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	80.0%	88.4%	25.5%	38.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	19.5%	18.2%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.3%	4.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.8%	11.4%
Middle	5	100.0%	100.0%	100.0%	100.0%	3	60.0%	51.5%	28.4%	23.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	40.0%	48.5%	36.0%	49.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.4%	10.6%
Total	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	3	25.0%	6.8%	11.4%	5.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	25.0%	8.9%	23.7%	12.6%
Middle	12	100.0%	100.0%	100.0%	100.0%	4	33.3%	14.2%	25.1%	21.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	70.0%	38.9%	59.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.9%	0.9%
Total	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	13.6%	0.7%	7.7%	3.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	3	13.6%	1.0%	20.6%	13.7%
Middle	22	100.0%	100.0%	100.0%	100.0%	8	36.4%	23.7%	26.9%	23.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	8	36.4%	74.6%	31.9%	44.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	12.9%	14.7%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	24	100.0%	100.0%	98.5%	99.6%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.5%	0.4%
Total	*24*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*20*	83.3%	67.0%	52.4%	45.2%
	By Loan Size				
$100,000 or less	14	58.3%	11.5%	89.8%	34.8%
$100,001-$250,000	4	16.7%	17.2%	6.2%	24.4%
$250,001-$1 Million	6	25.0%	71.3%	3.9%	40.8%
Total	*24*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	11.8%	6.8%	5.4%	2.7%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	11.8%	7.2%	17.4%	13.0%
Middle	17	100.0%	100.0%	100.0%	100.0%	7	41.2%	45.2%	22.0%	20.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	17.6%	24.9%	30.8%	43.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	17.6%	15.9%	24.4%	20.8%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.5%	3.6%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	15.3%	19.3%	12.8%
Middle	7	100.0%	100.0%	100.0%	100.0%	2	28.6%	17.9%	22.3%	16.2%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	28.6%	36.0%	40.5%	49.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	28.6%	30.7%	12.4%	17.7%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	1	6.3%	3.0%	16.3%	6.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	4	25.0%	21.2%	18.4%	8.4%
Middle	16	100.0%	100.0%	100.0%	100.0%	6	37.5%	42.4%	30.5%	30.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	31.3%	33.3%	33.9%	52.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.8%	2.0%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	7.5%	5.1%	8.0%	3.3%
Moderate	0	0.0%	0.0%	0.0%	0.0%	7	17.5%	9.5%	18.3%	12.5%
Middle	40	100.0%	100.0%	100.0%	100.0%	15	37.5%	38.9%	24.1%	19.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	10	25.0%	27.7%	34.9%	46.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	12.5%	18.7%	14.7%	18.6%
Total	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%
Middle	29	100.0%	100.0%	97.4%	99.5%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.6%	0.5%
Total	*29*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*17*	58.6%	30.3%	45.5%	40.8%
	By Loan Size				
$100,000 or less	20	69.0%	18.2%	90.1%	35.8%
$100,001-$250,000	3	10.3%	13.3%	6.5%	27.6%
$250,001-$1 Million	6	20.7%	68.5%	3.4%	36.6%
Total	*29*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	1.5%	1.3%	0	0.0%	0.0%	10.5%	5.6%
Moderate	0	0.0%	0.0%	7.1%	5.1%	2	25.0%	24.4%	23.2%	16.9%
Middle	8	100.0%	100.0%	91.3%	93.6%	3	37.5%	23.4%	22.4%	20.5%
Upper	0	0.0%	0.0%	0.0%	0.0%	3	37.5%	52.2%	33.4%	46.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.4%	10.2%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.5%	0.4%	3	9.7%	5.7%	11.5%	8.0%
Moderate	1	3.2%	2.1%	6.1%	5.1%	7	22.6%	26.9%	21.6%	17.5%
Middle	30	96.8%	97.9%	93.4%	94.5%	10	32.3%	32.4%	24.3%	21.3%
Upper	0	0.0%	0.0%	0.0%	0.0%	11	35.5%	35.0%	36.3%	45.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.3%	7.4%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	1.0%	0.5%	1	5.9%	5.1%	7.1%	4.6%
Moderate	0	0.0%	0.0%	6.8%	7.4%	7	41.2%	33.4%	16.7%	14.5%
Middle	17	100.0%	100.0%	92.3%	92.1%	2	11.8%	16.3%	25.4%	24.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	29.4%	32.5%	45.7%	47.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	11.8%	12.7%	5.1%	9.1%
Total	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.0%	2.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.0%	0.9%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	30.0%	50.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	50.0%	47.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	1.1%	0.9%	4	7.1%	4.1%	10.4%	6.3%
Moderate	1	1.8%	1.0%	6.7%	5.2%	16	28.6%	27.8%	21.7%	16.7%
Middle	55	98.2%	99.0%	92.3%	93.9%	15	26.8%	26.2%	23.4%	20.7%
Upper	0	0.0%	0.0%	0.0%	0.0%	19	33.9%	38.9%	36.1%	46.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.6%	3.1%	8.4%	9.8%
Total	*56*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*56*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	11.4%	18.8%	3.7%	3.7%
Moderate	2	4.5%	1.2%	4.9%	7.3%
Middle	37	84.1%	80.0%	90.1%	88.6%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.3%	0.4%
Total	*44*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*19*	43.2%	8.5%	44.8%	35.6%
	By Loan Size				
$100,000 or less	25	56.8%	7.2%	89.5%	29.3%
$100,001-$250,000	5	11.4%	9.4%	5.6%	18.0%
$250,001-$1 Million	14	31.8%	83.4%	5.0%	52.7%
Total	*44*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.7%	0.4%	1	50.0%	31.6%	6.7%	2.2%
Moderate	0	0.0%	0.0%	7.2%	3.4%	1	50.0%	68.4%	21.2%	10.0%
Middle	2	100.0%	100.0%	92.1%	96.3%	0	0.0%	0.0%	26.8%	16.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	35.2%	65.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.1%	6.1%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.6%	1.0%	0	0.0%	0.0%	6.6%	3.3%
Moderate	0	0.0%	0.0%	5.6%	4.9%	1	25.0%	27.1%	16.7%	12.7%
Middle	4	100.0%	100.0%	93.8%	94.1%	0	0.0%	0.0%	22.8%	19.6%
Upper	0	0.0%	0.0%	0.0%	0.0%	2	50.0%	44.3%	39.6%	48.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	25.0%	28.6%	14.3%	15.6%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.5%	5.0%	6	16.7%	8.2%	12.3%	5.5%
Moderate	1	2.8%	1.2%	9.5%	4.6%	8	22.2%	17.9%	19.7%	14.9%
Middle	35	97.2%	98.8%	90.0%	90.4%	10	27.8%	33.2%	24.1%	20.1%
Upper	0	0.0%	0.0%	0.0%	0.0%	12	33.3%	40.6%	39.2%	46.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.6%	13.0%
Total	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	25.0%	27.3%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	12.5%	0.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	62.5%	71.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.7%	2.4%	7	15.9%	0.6%	7.7%	2.5%
Moderate	1	2.3%	0.0%	7.1%	3.6%	10	22.7%	2.2%	19.4%	10.3%
Middle	43	97.7%	100.0%	92.2%	94.0%	10	22.7%	0.8%	24.9%	16.4%
Upper	0	0.0%	0.0%	0.0%	0.0%	14	31.8%	2.3%	37.2%	56.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	6.8%	94.0%	10.8%	14.3%
Total	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*44*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	5	19.2%	24.0%	2.1%	5.7%
Moderate	0	0.0%	0.0%	4.5%	6.2%
Middle	21	80.8%	76.0%	91.3%	87.5%
Upper	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	2.0%	0.6%
Total	*26*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*5*	19.2%	3.0%	45.1%	33.1%
	By Loan Size				
$100,000 or less	7	26.9%	2.0%	91.9%	34.3%
$100,001-$250,000	3	11.5%	6.0%	4.4%	16.4%
$250,001-$1 Million	16	61.5%	92.0%	3.7%	49.4%
Total	*26*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.4%	2.9%
Moderate	3	21.4%	5.0%	9.0%	5.8%	4	28.6%	18.1%	24.8%	18.9%
Middle	10	71.4%	76.0%	77.1%	77.2%	3	21.4%	20.3%	25.6%	24.5%
Upper	1	7.1%	19.0%	14.0%	17.0%	5	35.7%	59.1%	32.8%	42.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	14.3%	2.5%	11.5%	11.1%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.6%	3.1%
Moderate	1	9.1%	6.6%	9.8%	8.1%	4	36.4%	33.6%	15.9%	11.1%
Middle	10	90.9%	93.4%	77.4%	74.1%	3	27.3%	35.7%	23.8%	19.4%
Upper	0	0.0%	0.0%	12.8%	17.9%	0	0.0%	0.0%	37.8%	45.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	36.4%	30.7%	16.0%	20.7%
Total	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	2	11.1%	6.5%	9.8%	3.6%
Moderate	2	11.1%	13.7%	16.6%	13.1%	5	27.8%	20.2%	19.8%	16.0%
Middle	16	88.9%	86.3%	75.9%	76.8%	3	16.7%	24.4%	25.6%	19.2%
Upper	0	0.0%	0.0%	7.5%	10.1%	8	44.4%	48.8%	41.0%	55.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	5.7%
Total	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	6.7%	2.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	86.7%	76.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	6.7%	21.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	2	4.4%	0.4%	6.5%	2.8%
Moderate	6	13.3%	5.6%	10.6%	6.9%	13	28.9%	21.3%	20.8%	14.8%
Middle	38	84.4%	83.7%	77.0%	76.0%	9	20.0%	23.3%	24.8%	20.9%
Upper	1	2.2%	10.7%	12.4%	17.1%	13	28.9%	36.5%	35.6%	42.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	17.8%	18.5%	12.2%	19.5%
Total	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	11.8%	10.5%
Middle	28	71.8%	46.6%	74.9%	69.0%
Upper	11	28.2%	53.4%	13.3%	20.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*39*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*15*	38.5%	12.6%	42.4%	35.6%
	By Loan Size				
$100,000 or less	18	46.2%	6.5%	90.6%	32.5%
$100,001-$250,000	3	7.7%	5.5%	4.9%	18.0%
$250,001-$1 Million	18	46.2%	88.0%	4.5%	49.5%
Total	*39*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.3%	4.5%
Moderate	0	0.0%	0.0%	9.3%	5.6%	1	14.3%	10.9%	19.6%	13.9%
Middle	7	100.0%	100.0%	76.5%	77.7%	3	42.9%	36.7%	22.9%	21.4%
Upper	0	0.0%	0.0%	14.1%	16.7%	2	28.6%	25.0%	32.4%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	14.3%	27.3%	16.7%	15.4%
Total	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.8%	3.9%
Moderate	0	0.0%	0.0%	10.1%	8.9%	1	16.7%	8.9%	15.8%	9.8%
Middle	6	100.0%	100.0%	77.3%	76.8%	1	16.7%	13.8%	24.3%	19.9%
Upper	0	0.0%	0.0%	12.6%	14.3%	1	16.7%	23.0%	40.1%	47.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	50.0%	54.3%	13.0%	19.1%
Total	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	3	21.4%	14.6%	9.3%	4.7%
Moderate	2	14.3%	28.1%	11.3%	11.6%	7	50.0%	42.7%	20.6%	13.3%
Middle	12	85.7%	71.9%	81.7%	78.1%	2	14.3%	22.5%	25.7%	19.9%
Upper	0	0.0%	0.0%	7.0%	10.3%	2	14.3%	20.2%	40.5%	55.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.9%	6.4%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	23.1%	8.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	76.9%	91.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	3	11.1%	0.9%	8.0%	4.2%
Moderate	2	7.4%	1.7%	10.1%	7.4%	9	33.3%	12.2%	18.5%	12.2%
Middle	25	92.6%	98.3%	78.0%	77.7%	6	22.2%	28.2%	23.9%	20.4%
Upper	0	0.0%	0.0%	11.9%	15.0%	5	18.5%	24.0%	36.5%	46.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	14.8%	34.7%	13.1%	17.1%
Total	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	3.4%	0.2%	10.4%	11.2%
Middle	17	58.6%	40.9%	75.3%	70.9%
Upper	11	37.9%	58.9%	11.2%	17.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.1%	0.5%
Total	*29*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*9*	31.0%	9.4%	46.9%	37.3%
	By Loan Size				
$100,000 or less	10	34.5%	3.7%	88.0%	29.7%
$100,001-$250,000	3	10.3%	5.3%	6.7%	18.7%
$250,001-$1 Million	16	55.2%	91.0%	5.3%	51.7%
Total	*29*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Non-Metropolitan Pennsylvania - Group D

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	0.0%	0.0%	2	20.0%	5.3%	7.7%	4.1%
Moderate	1	10.0%	8.4%	7.0%	4.7%	2	20.0%	15.7%	17.4%	12.1%
Middle	8	80.0%	80.8%	76.5%	75.3%	2	20.0%	18.0%	23.0%	20.9%
Upper	1	10.0%	10.8%	16.5%	20.0%	3	30.0%	49.0%	35.1%	47.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	10.0%	12.0%	16.7%	15.6%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.5%	3.2%
Moderate	1	10.0%	6.8%	12.3%	10.4%	1	10.0%	3.6%	20.1%	15.0%
Middle	8	80.0%	74.2%	77.1%	77.4%	2	20.0%	12.3%	23.3%	19.9%
Upper	1	10.0%	19.0%	10.6%	12.2%	7	70.0%	84.1%	40.7%	49.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	9.4%	12.0%
Total	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	0.0%	0.0%	5	25.0%	24.0%	11.6%	4.6%
Moderate	2	10.0%	6.2%	10.7%	7.8%	2	10.0%	6.2%	17.6%	10.4%
Middle	18	90.0%	93.8%	81.3%	80.7%	6	30.0%	27.1%	22.3%	19.2%
Upper	0	0.0%	0.0%	7.9%	11.5%	7	35.0%	42.6%	43.6%	58.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.9%	7.2%
Total	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	83.3%	87.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	12.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	0	0.0%	0.0%	0.0%	0.0%	7	16.7%	0.3%	8.1%	3.4%
Moderate	4	9.5%	0.7%	9.5%	6.1%	5	11.9%	0.8%	18.3%	11.5%
Middle	36	85.7%	98.0%	77.7%	77.8%	10	23.8%	1.4%	22.9%	18.1%
Upper	2	4.8%	1.4%	12.8%	16.1%	17	40.5%	6.3%	38.4%	43.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	7.1%	91.2%	12.4%	23.5%
Total	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*42*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	12.3%	12.7%
Middle	18	60.0%	39.0%	73.9%	70.2%
Upper	12	40.0%	61.0%	10.7%	16.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.1%	0.3%
Total	*30*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*8*	26.7%	2.6%	44.3%	33.8%
	By Loan Size				
$100,000 or less	10	33.3%	3.8%	86.8%	26.7%
$100,001-$250,000	3	10.0%	5.3%	6.4%	16.8%
$250,001-$1 Million	17	56.7%	90.9%	6.8%	56.5%
Total	*30*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2018 Aggregate Comparison Loan Distribution Table

Assessment Area: Richmond, VA (MSA 40060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	0	0.0%	0.0%	7.3%	4.6%	2	3.0%	0.9%	8.9%	4.7%
Moderate	4	6.1%	1.8%	20.8%	14.4%	4	6.1%	2.8%	22.2%	15.7%
Middle	14	21.2%	19.2%	33.2%	30.3%	14	21.2%	17.0%	19.9%	18.2%
Upper	48	72.7%	78.9%	38.8%	50.7%	44	66.7%	75.6%	35.0%	45.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	3.0%	3.6%	14.0%	16.1%
Total	*66*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*66*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	4.5%	1.5%	5.5%	3.4%	7	31.8%	22.5%	12.4%	7.2%
Moderate	5	22.7%	19.4%	18.7%	13.2%	3	13.6%	13.5%	20.4%	15.8%
Middle	7	31.8%	34.1%	36.8%	33.9%	6	27.3%	32.4%	20.7%	19.3%
Upper	9	40.9%	45.0%	38.9%	49.3%	5	22.7%	25.4%	32.6%	42.7%
Unknown	0	0.0%	0.0%	0.1%	0.2%	1	4.5%	6.3%	13.9%	15.0%
Total	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	2	14.3%	14.0%	4.0%	2.9%	0	0.0%	0.0%	7.3%	4.7%
Moderate	0	0.0%	0.0%	14.4%	11.9%	2	14.3%	7.1%	16.2%	11.4%
Middle	4	28.6%	58.4%	34.4%	31.3%	6	42.9%	19.8%	22.4%	17.3%
Upper	8	57.1%	27.7%	47.2%	53.8%	6	42.9%	73.1%	48.8%	55.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	5.3%	10.7%
Total	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	23.9%	14.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	100.0%	28.3%	24.3%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	14.1%	11.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	30.4%	47.7%	0	0.0%	0.0%	2.2%	0.2%
Unknown	0	0.0%	0.0%	3.3%	2.1%	1	100.0%	100.0%	97.8%	99.8%
Total	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	3	2.9%	0.2%	6.6%	5.9%	9	8.7%	1.2%	9.7%	4.4%
Moderate	10	9.7%	61.2%	19.8%	15.8%	9	8.7%	1.6%	21.2%	13.0%
Middle	25	24.3%	8.8%	34.1%	27.9%	26	25.2%	7.5%	20.2%	15.4%
Upper	65	63.1%	29.8%	39.4%	50.0%	55	53.4%	28.4%	35.2%	37.6%
Unknown	0	0.0%	0.0%	0.1%	0.4%	4	3.9%	61.3%	13.7%	29.6%
Total	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*103*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	4.7%	1.7%	6.4%	8.2%
Moderate	7	16.3%	19.6%	22.8%	24.9%
Middle	11	25.6%	8.5%	30.1%	27.0%
Upper	23	53.5%	70.3%	39.5%	38.5%
Unknown	0	0.0%	0.0%	0.2%	0.5%
Tract Unknown	0	0.0%	0.0%	1.0%	1.0%
Total	*43*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*29*	67.4%	46.5%	49.0%	35.3%
	By Loan Size				
$100,000 or less	32	74.4%	16.7%	93.8%	36.8%
$100,001-$250,000	4	9.3%	15.8%	2.7%	12.6%
$250,001-$1 Million	7	16.3%	67.5%	3.5%	50.7%
Total	*43*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2017 Aggregate Comparison Loan Distribution Table

Assessment Area: Richmond, VA (MSA 40060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	2.2%	0.7%	6.4%	3.9%	6	6.5%	2.4%	8.2%	4.1%
Moderate	10	10.9%	6.7%	21.5%	15.0%	6	6.5%	4.3%	20.7%	14.7%
Middle	24	26.1%	26.5%	32.5%	29.6%	16	17.4%	15.8%	20.3%	18.8%
Upper	56	60.9%	66.1%	39.6%	51.4%	63	68.5%	77.2%	35.8%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.1%	1	1.1%	0.3%	15.0%	14.3%
Total	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*92*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	0	0.0%	0.0%	5.4%	3.1%	0	0.0%	0.0%	8.9%	4.9%
Moderate	4	25.0%	14.4%	19.7%	14.0%	2	12.5%	8.9%	17.0%	12.6%
Middle	4	25.0%	27.8%	36.3%	34.0%	1	6.3%	1.3%	19.3%	17.0%
Upper	8	50.0%	57.8%	38.5%	48.9%	7	43.8%	63.7%	34.4%	45.4%
Unknown	0	0.0%	0.0%	0.0%	0.1%	6	37.5%	26.0%	20.4%	20.1%
Total	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	6.7%	3.9%	1	12.5%	2.8%	9.4%	3.6%
Moderate	2	25.0%	8.7%	18.0%	12.8%	2	25.0%	61.6%	22.9%	16.6%
Middle	3	37.5%	67.8%	35.7%	30.1%	1	12.5%	6.9%	22.3%	18.8%
Upper	3	37.5%	23.5%	39.7%	53.2%	4	50.0%	28.7%	38.4%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	7.0%	8.5%
Total	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	14.0%	16.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	30.2%	33.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	38.4%	24.4%	19.8%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	50.0%	61.6%	30.2%	29.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	1.2%	0.4%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	2	1.7%	0.4%	6.1%	4.7%	7	5.9%	1.2%	8.4%	4.0%
Moderate	16	13.6%	4.0%	20.8%	16.3%	10	8.5%	2.8%	19.6%	13.0%
Middle	32	27.1%	32.2%	33.8%	29.9%	18	15.3%	7.6%	20.0%	16.7%
Upper	68	57.6%	63.4%	39.2%	49.0%	74	62.7%	40.3%	35.4%	43.3%
Unknown	0	0.0%	0.0%	0.0%	0.1%	9	7.6%	48.1%	16.6%	23.0%
Total	*118*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*118*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	2	9.1%	6.9%	6.2%	7.6%
Moderate	3	13.6%	5.7%	23.2%	24.4%
Middle	9	40.9%	44.7%	29.4%	29.5%
Upper	8	36.4%	42.6%	40.0%	37.0%
Unknown	0	0.0%	0.0%	0.2%	0.6%
Tract Unknown	0	0.0%	0.0%	1.1%	0.8%
Total	*22*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*17*	77.3%	71.4%	53.1%	37.6%
	By Loan Size				
$100,000 or less	14	63.6%	20.2%	92.7%	33.2%
$100,001-$250,000	5	22.7%	27.8%	3.3%	14.2%
$250,001-$1 Million	3	13.6%	51.9%	4.0%	52.6%
Total	*22*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2016 Aggregate Comparison Loan Distribution Table

Assessment Area: Richmond, VA (MSA 40060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	4	8.7%	6.4%	4.6%	2.5%	6	13.0%	4.8%	7.3%	3.7%
Moderate	5	10.9%	5.1%	18.8%	12.7%	5	10.9%	5.9%	19.3%	13.5%
Middle	4	8.7%	5.3%	30.6%	27.2%	8	17.4%	15.6%	19.9%	17.7%
Upper	33	71.7%	83.2%	46.0%	57.5%	24	52.2%	67.4%	36.4%	48.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	6.5%	6.3%	17.1%	16.4%
Total	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*46*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	1	4.8%	3.3%	3.0%	1.6%	0	0.0%	0.0%	5.1%	2.5%
Moderate	3	14.3%	8.3%	14.0%	9.0%	2	9.5%	10.5%	11.7%	7.7%
Middle	3	14.3%	10.8%	29.2%	25.3%	2	9.5%	7.0%	16.7%	13.8%
Upper	14	66.7%	77.6%	53.7%	64.1%	6	28.6%	35.9%	42.7%	52.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	52.4%	46.6%	23.8%	23.6%
Total	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	1	33.3%	33.8%	5.2%	2.3%	0	0.0%	0.0%	8.1%	2.4%
Moderate	1	33.3%	60.4%	18.3%	8.8%	1	33.3%	60.4%	19.4%	12.0%
Middle	1	33.3%	5.8%	28.6%	24.1%	1	33.3%	5.8%	21.1%	15.8%
Upper	0	0.0%	0.0%	47.8%	64.8%	0	0.0%	0.0%	44.1%	59.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	33.3%	33.8%	7.2%	10.2%
Total	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	2	50.0%	85.2%	17.6%	41.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	50.0%	14.8%	37.8%	35.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	18.9%	11.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.7%	10.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	100.0%	100.0%	100.0%	100.0%
Total	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	8	10.8%	40.8%	3.9%	4.2%	6	8.1%	1.9%	6.3%	3.0%
Moderate	11	14.9%	10.3%	16.8%	12.3%	8	10.8%	4.5%	15.9%	10.3%
Middle	8	10.8%	3.8%	29.9%	25.6%	11	14.9%	7.3%	18.5%	15.1%
Upper	47	63.5%	45.1%	49.4%	58.0%	30	40.5%	32.4%	39.4%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	19	25.7%	53.9%	19.9%	23.6%
Total	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*74*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	1	2.9%	0.9%	7.4%	11.6%
Moderate	2	5.7%	3.0%	18.9%	19.9%
Middle	10	28.6%	10.6%	27.8%	26.3%
Upper	22	62.9%	85.4%	45.8%	41.7%
Unknown	0	0.0%	0.0%	0.1%	0.4%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%
Total	*35*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*26*	74.3%	68.8%	45.9%	33.9%
	By Loan Size				
$100,000 or less	19	54.3%	10.6%	92.9%	34.6%
$100,001-$250,000	6	17.1%	17.8%	3.1%	13.1%
$250,001-$1 Million	10	28.6%	71.6%	3.9%	52.2%
Total	*35*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2015 Aggregate Comparison Loan Distribution Table

Assessment Area: Richmond, VA (MSA 40060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	2	1.8%	1.0%	4.2%	2.2%	14	12.5%	5.4%	9.3%	4.6%
Moderate	18	16.1%	8.2%	16.9%	10.5%	19	17.0%	10.1%	20.4%	14.4%
Middle	16	14.3%	10.4%	31.5%	27.4%	31	27.7%	26.4%	18.4%	17.3%
Upper	76	67.9%	80.4%	47.4%	59.9%	45	40.2%	55.8%	32.4%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.7%	2.2%	19.5%	18.8%
Total	*112*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*112*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	3	9.7%	3.7%	3.3%	1.6%	0	0.0%	0.0%	6.3%	3.4%
Moderate	2	6.5%	4.8%	14.9%	9.9%	1	3.2%	1.6%	14.2%	9.7%
Middle	9	29.0%	21.5%	29.4%	25.4%	3	9.7%	6.8%	17.4%	14.9%
Upper	17	54.8%	70.0%	52.4%	63.0%	10	32.3%	45.0%	34.5%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	17	54.8%	46.6%	27.5%	27.6%
Total	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	4.4%	2.6%	1	50.0%	21.9%	11.4%	4.7%
Moderate	0	0.0%	0.0%	20.1%	9.2%	0	0.0%	0.0%	22.1%	12.9%
Middle	2	100.0%	100.0%	28.3%	23.1%	0	0.0%	0.0%	21.4%	18.5%
Upper	0	0.0%	0.0%	47.2%	65.0%	1	50.0%	78.1%	38.9%	54.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.1%	9.1%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	23.4%	31.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	25.0%	22.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	29.7%	33.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	21.9%	13.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Total	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*	*0*	*0.0%*	*0.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	5	3.4%	1.5%	3.9%	3.5%	15	10.3%	4.4%	8.1%	3.9%
Moderate	20	13.8%	7.5%	16.2%	10.9%	20	13.8%	8.5%	17.9%	11.7%
Middle	27	18.6%	12.6%	30.4%	26.8%	34	23.4%	22.6%	18.1%	15.5%
Upper	93	64.1%	78.4%	49.4%	58.7%	56	38.6%	53.8%	33.5%	42.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	13.8%	10.8%	22.4%	26.5%
Total	*145*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*145*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	3	9.7%	17.2%	7.0%	11.5%
Moderate	9	29.0%	31.1%	20.5%	21.7%
Middle	7	22.6%	8.7%	28.5%	26.1%
Upper	12	38.7%	43.0%	42.9%	39.6%
Unknown	0	0.0%	0.0%	0.1%	0.3%
Tract Unknown	0	0.0%	0.0%	1.1%	0.8%
Total	*31*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*21*	67.7%	59.1%	51.3%	35.7%
	By Loan Size				
$100,000 or less	16	51.6%	10.9%	91.6%	30.2%
$100,001-$250,000	5	16.1%	13.1%	3.8%	14.9%
$250,001-$1 Million	10	32.3%	76.0%	4.6%	54.9%
Total	*31*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases

2014 Aggregate Comparison Loan Distribution Table

Assessment Area: Richmond, VA (MSA 40060)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank			Aggregate		Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)	#	%	% $(000s)	%	% $(000s)
	Home Purchase									
Low	12	12.2%	6.1%	4.0%	1.9%	16	16.3%	7.5%	9.8%	4.7%
Moderate	24	24.5%	14.4%	16.4%	10.1%	18	18.4%	11.0%	19.4%	13.4%
Middle	21	21.4%	17.2%	31.2%	27.1%	12	12.2%	10.9%	17.9%	16.5%
Upper	41	41.8%	62.4%	48.4%	61.0%	34	34.7%	54.2%	34.4%	47.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	18.4%	16.3%	18.5%	17.6%
Total	*98*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*98*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Refinance									
Low	4	12.5%	7.2%	4.7%	2.7%	2	6.3%	4.7%	9.1%	4.9%
Moderate	8	25.0%	21.9%	17.2%	11.6%	5	15.6%	18.0%	15.6%	11.2%
Middle	10	31.3%	31.1%	30.7%	27.0%	1	3.1%	5.3%	17.8%	16.0%
Upper	10	31.3%	39.8%	47.5%	58.7%	4	12.5%	8.8%	32.6%	42.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	62.5%	63.1%	25.0%	25.3%
Total	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Home Improvement									
Low	0	0.0%	0.0%	5.3%	2.3%	0	0.0%	0.0%	14.2%	4.5%
Moderate	0	0.0%	0.0%	22.3%	8.5%	0	0.0%	0.0%	23.2%	12.7%
Middle	2	100.0%	100.0%	32.8%	28.8%	0	0.0%	0.0%	17.7%	10.5%
Upper	0	0.0%	0.0%	39.5%	60.5%	2	100.0%	100.0%	33.1%	56.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.8%	15.5%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	Multi-Family									
Low	0	0.0%	0.0%	17.0%	22.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	32.1%	22.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	28.3%	16.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	22.6%	38.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
Total	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*100.0%*	*100.0%*
	HMDA Totals									
Low	16	11.9%	6.1%	4.4%	3.2%	18	13.4%	6.8%	9.7%	4.5%
Moderate	32	23.9%	15.3%	17.0%	11.2%	23	17.2%	12.0%	18.2%	12.0%
Middle	35	26.1%	21.7%	31.1%	26.5%	13	9.7%	9.7%	17.8%	15.4%
Upper	51	38.1%	56.8%	47.5%	59.1%	40	29.9%	45.4%	33.6%	43.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	40	29.9%	26.0%	20.8%	24.2%
Total	*134*	*100.0%*	*100.0%*	*100.0%*	*100.0%*	*134*	*100.0%*	*100.0%*	*100.0%*	*100.0%*

	SMALL BUSINESS				
	By Tract Income				
	Bank			Aggregate	
	#	%	% $(000s)	%	% $(000s)
Low	0	0.0%	0.0%	7.3%	11.6%
Moderate	7	28.0%	12.0%	20.1%	19.7%
Middle	4	16.0%	6.1%	27.6%	27.7%
Upper	14	56.0%	81.9%	43.3%	39.6%
Unknown	0	0.0%	0.0%	0.1%	0.4%
Tract Unknown	0	0.0%	0.0%	1.6%	1.0%
Total	*25*	100.0%	100.0%	100.0%	100.0%
	By Revenue				
$1 Million or Less	*14*	56.0%	49.3%	46.5%	31.4%
	By Loan Size				
$100,000 or less	19	76.0%	30.4%	90.5%	27.9%
$100,001-$250,000	2	8.0%	9.1%	4.3%	16.2%
$250,001-$1 Million	4	16.0%	60.5%	5.2%	55.9%
Total	*25*	*100.0%*	*100.0%*	100.0%	100.0%

Originations and Purchases