

PUBLIC DISCLOSURE

August 8, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Elmira Savings Bank
RSSD No. 861304

333 East Water Street
Elmira, NY 14901

FEDERAL RESERVE BANK OF NEW YORK
33 LIBERTY STREET
NEW YORK, NY 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.

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INSTITUTION'S CRA RATING: This institution is rated Satisfactory.
The Lending Test is rated: Satisfactory.
The Community Development Test is rated: Satisfactory.

The major factors supporting the satisfactory performance rating for Elmira Savings Bank ("ESB") with regard to the Community Reinvestment Act ("CRA") include the following:

- A majority of loans and other lending-related activity were made in the assessment areas;
- The loan-to-deposit ratio was more than reasonable given the bank's size, financial condition and assessment areas' credit needs;
- Loan distribution represents a reasonable penetration among individuals of different income (including low- and moderate-income) levels and businesses of different sizes;
- The geographic distribution of loans reflected a reasonable dispersion throughout the assessment areas;
- The bank's community development performance demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas; and,
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.

SCOPE OF EXAMINATION

Procedures

ESB was evaluated using the Federal Financial Institutions Examination Council's ("FFIEC") Interagency Intermediate Small Institution Examination Procedures. These procedures include a lending test, which evaluates the bank's record of meeting the credit needs of its assessment area through its lending activities; and a community development test, which evaluates the bank's responsiveness to community development needs in its assessment areas.

Examiners conducted full scope reviews on all three of ESB's assessment areas: MSA 23100 (Elmira, NY), MSA 27060 (Ithaca, NY) and Non-metropolitan Area, consisting of all of Schuyler and Steuben Counties and portions of Cayuga and Seneca Counties, NY. ESB's performance in MSA 21300 (Elmira, NY) received the most weight in determining the Bank's overall rating because of the high concentration of deposits, lending, population, and owner-

occupied housing units located therein relative to the other two. Specifically, MSA 21300 (Elmira, NY) had 56.8% of the deposits of the combined assessment area and 49.1% of the combined HMDA, small business, and consumer loan volume. See the Summary of Key Assessment Area Data for details.

As shown in the table below, the lending test evaluation covered the period from January 1, 2013 to December 31, 2015. The assessment period for ESB's community development activities was from April 1, 2013 to June 30, 2016.

PERFORMANCE CRITERION	EVALUATION PERIOD
Loan-to-Deposit Ratio	January 1, 2013 – June 30, 2016
Lending in Assessment Areas	January 1, 2013 – December 31, 2015
Borrower Distribution of Loans	January 1, 2013 – December 31, 2015
Geographic Distribution Of Loans	January 1, 2013 – December 31, 2015
Response to CRA Complaints	January 1, 2013 – December 31, 2015
Community Development Lending	April 1, 2013 – June 30, 2016
Qualified Investments	April 1, 2013 – June 30, 2016
Community Development Services	April 1, 2013 – June 30, 2016

Products

Retail loan products evaluated include home purchase, refinance, and home improvement loans reported under the Home Mortgage Disclosure Act (“HMDA”). Examiners verified the integrity of the loan data as part of the evaluation. Multifamily loans were excluded from the borrower and geographic distribution evaluations as the volume was too insignificant for analysis.

In addition, a sample of 107 small business and 200 consumer loans were selected for review. The loan samples were selected using the Board of Governors’ sampling procedures. Examiners also reviewed community development loans, qualified investments, and community development services.

Lending Distribution Analysis

The analyses of borrower and geographic distributions were based on the loans made in the assessment areas. To analyze the borrower characteristics of HMDA-related and consumer loans, the proportion of originations to low- and moderate-income (“LMI”) borrowers was compared with the proportion of LMI families for HMDA loans and the proportion of LMI households for consumer loans. Income estimates from the U.S. Department of Housing and Urban Development (“HUD”) and the FFIEC were used to categorize borrower income. For small business loans, ESB’s percentage of loans to businesses with gross annual revenues (“GAR”) of \$1 million or less was compared to the percentage of all such businesses as reported by Dun and Bradstreet (“D&B”) in the assessment areas. The size of the small business loan was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

To evaluate geographic distribution, the proportion of loan originations was compared to the proportion of owner-occupied housing units located in LMI geographies. For consumer and small business loans, the analysis compared the proportion of loan originations to the proportion of households and small businesses in LMI geographies. ESB's performance was also compared to the 2015 aggregate loan data of all HMDA and and/or CRA small business reporting lenders.

Aggregate data for consumer lending was not available for analysis. Lending performance in 2013 and in 2014 was compared to the bank's performance in 2015.

Peer data was used for the loan-to-deposit analysis. Similarly situated banks were selected based on the amount of deposits and number of branches. ESB's loan-to-deposit performance was compared to its national peer group.

Community Contacts

In order to learn more about community credit needs, examiners conducted interviews with two non-profit organizations. One organization's mission was to promote affordable housing in the MSA 23100 (Elmira, NY) assessment area and the other organization's mission was to provide social services in the Non-metropolitan assessment area. Details from these interviews are presented within the performance context of the respective assessment areas in this evaluation.

DESCRIPTION OF INSTITUTION

Originally founded in 1869, ESB is a New York State-chartered bank that converted from a federally-chartered savings bank effective January 1, 2012. Headquartered in Elmira, New York, ESB operates as an independent community bank serving consumers and businesses. ESB offers a variety of commercial and consumer deposit and loan products. ESB offers personal and commercial savings, checking and certificates of deposit and Individual Retirement Accounts (IRAs). Lending products include fixed and adjustable rate mortgages, home improvement loans, home equity loans and lines of credit, consumer loans, including automobile and personal loans, and commercial loan products.

As of June 30, 2016, ESB's total assets were \$575 million, with total deposits of \$473 million and gross total loans of \$472 million. ESB operates 13 full-service branch offices, six of which are located in Chemung County, three in Tompkins County, two in Steuben County, one in Schuyler County, and one in Cayuga County. Additionally, ESB operates a loan production office in Broome County. ESB operates in a competitive market with numerous local and regional banks, such as Chemung Canal Trust Company, Community Bank National Association, Steuben Trust Company, Manufacturers and Traders Trust Company and First Niagara Bank National Association.

The chart below shows the composition of ESB’s loan portfolio as of June 30, 2016.

LOAN PORTFOLIO SUMMARY		
Loan Type	Dollar Amount ('000s)	Percent of Total
Commercial & Industrial	\$22,014	4.7%
Nonfarm Nonresidential Real Estate	\$66,814	14.0%
Construction & Land Development	\$13,556	2.9%
Secured by 1-4 Family Residential Real Estate	\$323,997	68.6%
Multifamily	\$10,229	2.2%
Consumer	\$35,652	7.6%
Other	\$163	0.0%
Total	\$472,425	100%

ESB’s previous CRA evaluation was conducted as of April 8, 2013, using the FFIEC’s Interagency Intermediate Small Institution Examination Procedures. The prior evaluation resulted in an overall rating of Satisfactory. There were no financial or legal factors that would prevent ESB from fulfilling its responsibility under CRA.

DESCRIPTION OF ASSESSMENT AREAS

ESB has three assessment areas located in central and southern New York State. The assessment areas are as follows:

- MSA 21300 (Elmira, NY), consisting of Chemung County,
- MSA 27060 (Ithaca, NY), consisting of Tompkins County, and
- Non-Metropolitan Area, consisting of all of Schuyler and Steuben Counties and portions of Cayuga and Seneca Counties, NY, all of which are contiguous.

The assessment areas did not change from the previous CRA evaluation. The assessment areas are in compliance with the requirements of Section 228.41 of Regulation BB and do not arbitrarily exclude LMI geographies. See the Summary of Key Assessment Area Data for details.

Summary of Key Assessment Area Data				
	MSA 21300 (Elmira, NY)	MSA 27060 (Ithaca, NY)	Non-Metropolitan Assessment Area	Totals
Total Population ⁴	88,830	101,564	147,942	338,336
Population % of AA population	26.3%	30.0%	43.7%	100.0%
Families	22,962	19,798	39,163	81,923
Families % of AA families	28.0%	24.2%	47.8%	100.0%
Total Census Tracts ⁴	22	23	42	87
Tracts % AA tracts	25.3%	26.4%	48.3%	100.0%
LMI tracts	8	5	3	16
LMI tracts % all AA LMI tracts	50.0%	31.3%	18.8%	100.0%
Total Owner-Occupied Units ⁴	24,121	21,157	43,990	89,268
Units % of AA units	27.0%	23.7%	49.3%	100.0%
Business Establishments ⁵	3,082	4,148	5,256	12,486
Bus. est. % AA bus. est.	24.7%	33.2%	42.1%	100.0%
Number of Branches ¹	6	3	4	13
Branches % all branches	46.2%	23.1%	30.8%	100.0%
Branches in LMI tracts	3	1	0	4
LMI branches % AA LMI branches	75.0%	25.0%	0.0%	100.0%
Branch Deposits (\$'000s) ²	268,393	122,040	82,103	472,536
Deposits % AA deposits	56.8%	25.8%	17.4%	100.0%
Deposit Market Share (%)/ Rank in Mkt.	26/2	6.3/3	.95/12	
Home Purchase Originations ³	555	349	492	1,396
HP originations % AA orig.	39.8%	25.0%	35.2%	100.0%
Refinance Originations ³	318	116	142	576
Refi orig. % AA orig.	55.2%	20.1%	24.7%	100.0%
Home Improvement Originations ³	380	127	127	634
Home Improvement orig. % AA orig.	59.9%	20.0%	20.0%	100.0%
Small Business Originations ³	69	6	24	99
SB orig. % AA orig.	69.7%	6.1%	24.2%	100.0%
Consumer Loan Originations	60	22	30	112
SB orig. % AA orig.	53.6%	19.6%	26.8%	100.0%
Combined Loan Totals	1,382	620	815	2,817
% of AA Orig.	49.1%	22.0%	28.9%	100.0%

(1) Branch numbers are as of 6/30/2016. (2) Branch deposits and deposit market share are from the FDIC as of 6/30/16. (3)Originations are loans reported under HMDA and samples of small business and consumer loans for 2013 through 2015. (4)Demographic information was obtained from the 2010 Census. (5)Business establishments information was reported by D&B for 2015.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

ESB's overall record of meeting the credit needs of its assessment areas through lending performance was satisfactory. ESB originated a majority of its loans within its assessment areas and its loan-to-deposit ratio was more than reasonable. Based on ESB's performance in its assessment areas, the overall distribution of loans to borrowers of different incomes and businesses of different sizes and among geographies of different income levels determined to be reasonable

Loan-to-Deposit Ratio

ESB's loan-to-deposit ratio was more than reasonable given its size, financial condition, and the credit needs of its assessment areas. ESB's average loan-to-deposit ratio for the 14 most recent quarters ending June 30, 2016, was 98.5% based on information contained in its Consolidated Report of Condition and Income. This ratio was above the national peer average of 77.1% and above the average ratio of 78.8% for six similarly-situated banks, headquartered in ESB's assessment areas during the same time period.

Lending in the Assessment Areas

Lending was analyzed to determine the volume of lending inside and outside ESB's assessment areas. The majority of ESB's loans, 75.1% by number and 75.9% by dollar amount, were originated in its assessment areas. Compared to the prior CRA evaluation, this was a decrease in terms of both number and dollar percentages. At the prior CRA evaluation, ESB originated 80.6% by number and 81.0% by dollar amount of its total loans in the combined assessment area. Over the evaluation period, ESB originated 75.6% of its HMDA-related loans, 56.0% of its consumer loans, and 92.5% of its small business loans by number within its assessment areas, as shown in the table on the following page.

Lending Inside and Outside the Assessment Area								
1/1/2013 -12/31/2015								
Loan Type	Inside				Outside			
	#	%	\$ (‘000s)	%	#	%	\$ (‘000s)	%
Home Purchase	1,396	71.0	188,184	72.8	571	29.0	70,204	27.2
Refinancing	576	78.3	62,524	77.8	160	21.7	17,832	22.2
Home Improvement	634	85.0	19,067	85.7	112	15.0	3,193	14.3
Multifamily Housing	14	93.3	15,439	99.2	1	6.7	128	0.8
Total HMDA Related	2,620	75.6	285,214	75.7	844	24.4	91,357	24.3
Consumer	112	56.0	1,333	58.1	88	44.0	962	41.9
Small Business	99	92.5	12,422	81.9	8	7.5	2,744	18.1
All Loans	2,831	75.1	298,969	75.9	940	24.9	95,063	24.1

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

ESB’s overall lending penetration among borrowers of different income levels (including LMI individuals) and businesses of different sizes was reasonable when considering the performance in each of the three assessment areas.

Geographic Distribution of Loans

ESB’s geographic distribution of loans was reasonable based on the penetration of geographies of different income levels, including LMI geographies, in all three assessment areas.

Response to Complaints

Over the evaluation period, ESB did not receive any complaints relating to its CRA performance. Since becoming a state-chartered bank, there have not been any CRA-related complaints filed with the Federal Reserve Bank of New York.

COMMUNITY DEVELOPMENT TEST

ESB’s performance under the community development test was Satisfactory. ESB demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment areas.

During the evaluation period, ESB’s community development loans and qualified investments totaled \$9.7 million, of which 68.6% were made within ESB’s assessment areas. ESB received credit for qualified community development loans and qualified investments made outside of its assessment area because under the CRA, if a bank has adequately addressed the needs of its assessment area(s), then consideration can be given to community development loans that benefit the broader statewide or regional area that includes the assessment area. Three investments totaling \$472,000 were made to organizations that invest in affordable housing projects and

economic development activities throughout the State of New York. Community development loans and qualified investments increased from the \$6.7 million reported at the last evaluation. However, 54.3% represented new community development loans and qualified investments. See details in the table below.

Summary of Community Development Loans and Qualified Investments						
Inside and Outside Assessment Area						
April 1, 2013 - June 30, 2016						
Geography	Loans		Qualified Investments		TOTAL	
	(\$000)	%	(\$000)	%	(\$000)	%
MSA 21300 (Elmira, NY)	\$2,061	45.2%	\$727	14.3%	\$2,788	28.9%
MSA 27060 (Ithaca, NY)	\$0	0.0%	\$17	0.3%	\$17	0.2%
Non-Metropolitan	\$0	0.0%	\$3,825	75.0%	\$3,825	39.6%
Outside Assessment Area	\$2,500	54.8%	\$60	1.2%	\$2,560	26.5%
Broader Statewide	\$0	0.0%	\$472	9.3%	\$472	4.9%
TOTAL	\$4,561	100.00%	\$5,101	100.0%	\$9,662	100.0%

Community Development activity includes new loans and investments made during the examination period as well as investments with existing balances from the prior examination period that were outstanding as of 6/30/2016.

ESB's community development program was responsive to community needs. In terms of the total dollar amount of community development loans and qualified investments, affordable housing represented the majority at 41.8% of total activity, while revitalization and stabilization represented 33.5%, community services represented 22.2% and economic development accounted for 2.5%. Community contacts identified affordable housing and community services as critical needs throughout ESB's assessment areas.

Summary of Community Development Loans		
April 1, 2013 - June 30, 2016		
Designation	Loans	
	(\$000)	%
Affordable Housing	\$0	0.0%
Community Services	\$1,961	43.0%
Economic Development	\$0	0.0%
Revitalize and Stabilize	\$2,600	57.0%
TOTAL	\$4,561	100.0%

Summary of Qualified Investments <i>April 1, 2013 - June 30, 2016</i>		
Designation	Qualified Investments	
	(\$000)	%
Affordable Housing	\$4,042	79.2%
Community Services	\$187	3.7%
Economic Development	\$236	4.6%
Revitalize and Stabilize	\$636	12.5%
TOTAL	\$5,101	100.0%

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

ESB is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practice was identified as being inconsistent with helping to meet the credit needs of the assessment area.

METROPOLITAN AREA

MSA 21300 (Elmira, NY)

Full Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 21300 (Elmira, NY)

ESB's banking activities within its assessment areas were primarily conducted within MSA 21300 (Elmira, NY). As of June 30, 2016, ESB operated 6 of 13 branches (46.2%) in this MSA. One branch was located in a low-income tract and two were in moderate-income tracts. All branches provided a full range of financial services. The six branches generated \$268 million in deposits, which account for 56.8% of the Bank's total deposits as of June 30, 2016. Based on deposits reported to the Federal Deposit Insurance Corporation ("FDIC") on June 30, 2016, ESB had the second largest market share out of seven banks with approximately 26.0% of the deposits in MSA 21300 (Elmira, NY). Primary competitors include Chemung Canal Trust Company, Five Star Bank, Community Bank National Association, and Manufacturers and Traders Trust Co.

Overall, 49.1% of the lending within the bank's assessment areas was made in MSA 21300 (Elmira, NY). Of the Bank's total home purchase, refinance and home improvement loans originated in the assessment areas from 2013 through 2015, 48.1% were originated in this MSA. ESB ranked 1st in terms of HMDA related lending market share in this MSA. Additionally, 53.6% of consumer loans and 69.7% of small business loans sampled were originated in this MSA. The MSA 23100 (Elmira, NY) assessment area did not change from the previous evaluation. For additional assessment area data, please see Summary of Key Assessment Area Data.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's 2010 Census ("2010 Census"), the U.S. Department of Labor, the New York State Department of Labor, the FFIEC, the New York State Association of Realtors ("NYSAR") and D&B.

Demographic Characteristics

Of the 22 census tracts located in MSA 21300 (Elmira, NY), two, or 9.1%, were low-income and six, or 27.3%, were moderate-income. According to the 2010 Census, the population of MSA 21300 (Elmira, NY) was 88,830. The MSA is comprised of Chemung County with the City of Elmira being the largest city in the MSA with a population of 29,200. The percentage of the population age 65 and older was 15.7% in Chemung County compared with 13.5% in New York State.

Income Characteristics

According to the 2010 census, MSA 21300 (Elmira, NY) had 22,962 families, of which 5,082 (22.1%) were low-income, 3,801 (16.6%) were moderate-income and 2,689 (11.7%) lived below the poverty level. As shown in the table

FFIEC MEDIAN FAMILY INCOMES			
Area	2013	2014	2015
MSA 21300	\$58,600	\$63,400	\$64,300

to the right, the FFIEC-adjusted median family income for MSA 21300 (Elmira, NY) was \$64,300 in 2015, \$63,400 in 2014, and \$58,600 in 2013. These income levels are low in comparison to New York State’s 2015 FFIEC-adjusted median family income of \$72,000.

Housing Characteristics

MSA 21300 (Elmira, NY) had 38,371 housing units, of which 62.9% were owner-occupied, 29.4% were rental, and 7.7% were vacant, as of the 2010 Census. Of the total owner-occupied housing units, 2.8% were located in low-income census tracts and 23.3% were located in moderate-income census tracts. Demographic information from the 2010 census estimated that the median age of the housing stock to be 60 years.

Housing costs were comparatively low in the MSA 21300 (Elmira, NY), particularly in comparison to the state average median sales price as shown in the table to the right. Nonetheless, housing affordability remains difficult for low-income borrowers. The median

MEDIAN HOUSING SALES PRICE			
Area	2013	2014	2015
MSA 21300	\$110,000	\$100,000	\$103,900
NYS	\$226,500	\$225,000	\$230,000
Source: NYS Assoc. of Realtors			

housing cost in the assessment area was about three to four times the median family income of a low-income borrower and two times the income of a moderate-income borrower. Community contacts continue to report that due to Elmira’s proximity to Pennsylvania, where there had been an increase in drilling for natural gas, housing costs had been negatively affected. The increase in demand for housing due to the influx of natural gas workers seeking places to live resulted in a decrease in number of affordable rental housing units.

Labor, Employment and Economic Characteristics

Long term economic trends in MSA 21300 (Elmira, NY) indicated an increase in employment in the education, health care and services industries. However, community contacts noted that many of the service jobs were low paying. The unemployment rates in the MSA showed an improving trend. The average annual unemployment rates for Chemung County declined from 6.8% in 2013 to 5.4% in 2015. Unemployment rates for the MSA remained slightly higher than the rates for the State of New York.

U.S. DEPARTMENT OF LABOR ANNUAL UNEMPLOYMENT RATES			
Area	2013	2014	2015
MSA 21300	6.8%	5.6%	5.4%
NYS	6.7%	5.5%	4.7%

According to the New York State Department of Labor's January 2016 newsletter, *Employment in New York State*, the Southern Tier regional economy continued to bounce back from the worst recession in more than 75 years. For the five-year period ending November 2015, private sector job growth had increased 1.5%, contributing to the decline in unemployment for the region from 8% in 2010 to 5% in November 2015.

In 2015, MSA 21300 (Elmira, NY) had 3,082 business establishments, of which 89.5% are small businesses with GAR of less than or equal to \$1 million. Of the total businesses, 13.3% were located in low-income areas and 24.2% were located in moderate-income areas.

Community Contacts

In order to learn more about community credit needs, examiners conducted an interview with a non-profit organization that specializes in affordable housing. The contact stated that within the City of Elmira, homes were generally affordable but were less affordable outside the city. The city had many older homes that lower-income families were buying but had difficulties maintaining. In terms of the rental market, rents were expensive unless the renter receives a subsidy. Fracking in Pennsylvania drove up rents due to the influx of natural gas workers but rents have not dropped to previous levels as workers left the area resulting from a cool down in industry. The contact also stated that within the City of Elmira half of the students received free or reduced rate lunches.

For additional assessment area details see the Assessment Area Demographics Table on the following page.

Assessment Area Demographics								
Assessment Area : MSA 21300								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	9.1	915	4.0	387	42.3	5,082	22.1
Moderate-income	6	27.3	6,103	26.6	1,144	18.7	3,801	16.6
Middle-income	9	40.9	8,878	38.7	741	8.3	4,863	21.2
Upper-income	4	18.2	7,066	30.8	417	5.9	9,216	40.1
Unknown-income	1	4.5	0	0.0	0	0.0	0	0.0
Total Assessment Area	22	100.0	22,962	100.0	2,689	11.7	22,962	100.0
	Housing Units By Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,494	675	2.8	27.1	1,463	58.7	356	14.3
Moderate-income	10,954	5,629	23.3	51.4	4,647	42.4	678	6.2
Middle-income	14,799	9,951	41.3	67.2	3,432	23.2	1,416	9.6
Upper-income	10,124	7,866	32.6	77.7	1,755	17.3	503	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	38,371	24,121	100.0	62.9	11,297	29.4	2,953	7.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	410	13.3	337	12.2	69	24.6	4	9.3
Moderate-income	747	24.2	650	23.6	91	32.5	6	14.0
Middle-income	1,042	33.8	961	34.8	58	20.7	23	53.5
Upper-income	882	28.6	811	29.4	61	21.8	10	23.3
Unknown-income	1	0.0	0	0.0	1	0.0	0	0.0
Total Assessment Area	3,082	100.0	2,759	100.0	280	100.0	43	100.0
Percentage of Total Businesses:				89.5		9.1		1.4

Based on 2015 FFIEC Census Data. 2015 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 21300 (Elmira, NY)

LENDING TEST

Lending performance in MSA 21300 (Elmira, NY) was considered reasonable based on a reasonable geographic distribution of lending and excellent penetration among individuals of different income levels and businesses of different sizes. The greatest weight, based on number and dollar volume, was given to HMDA lending followed by consumer and small business lending. In addition, ESB's lending performance was compared to the 2015 aggregate of all lenders required to report HMDA and small business data within the assessment area. Performance in 2013 and 2014 was compared to aggregate data for 2013 and 2014 respectively. See the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of ESB's 2015, 2014 and 2013 loan distribution by geography, borrower income and business revenue size.

Geographic Distribution of Loans

ESB's overall geographic distribution of loans reflected reasonable dispersion throughout the entire assessment area, including LMI census tracts. ESB penetrated 100.0% of the census tracts with a reported income in the assessment area, indicating no conspicuous gaps in lending. Within MSA 21300 (Elmira, NY), HMDA-related and small business lending performance was excellent while consumer lending performance was reasonable when compared to demographic and market aggregate data..

Opportunities to make HMDA-related loans and consumer loans in low-income census tracts were very limited. According to the 2010 Census, 2.8% or 675 owner-occupied housing units and 6.0% of all households were located in low-income census tracts. The limited lending opportunities were confirmed by the performance of the market aggregate, which in 2015 made only 36 HMDA-related loans in low-income census tracts. According to the 2010 Census, 42.3% of all families living in low-income census tracts had incomes below the poverty level, further limiting lending opportunities. Based on this information, HMDA-related and consumer lending activity in moderate-income census tracts was given more weight. ESB's overall performance in 2013 and 2014 was comparable to its 2015 performance with regard to geographic distribution.

Home Purchase Loans

ESB's overall home purchase lending distribution was considered reasonable in light of demographic and performance context challenges, particularly related to the availability of owner-occupied housing in low-income census tracts in the assessment area.

ESB's home purchase lending performance in low-income census tracts was reasonable when compared to demographics and the market aggregate. The bank originated 1.7% of its home

purchase loans in low-income census tracts by number and 0.7% by dollar volume. According to the 2010 Census, 2.8% of owner-occupied housing units are located in low-income census tracts. This performance context consideration was confirmed by the performance of the market aggregate, which in 2015 made 1.6% by number and 0.8% by dollar in low-income census tracts. Home purchase lending performance in low-income census tracts in 2014 exceeded performance in 2015, while 2013 performance was comparable.

ESB's home purchase lending performance in moderate-income census tracts was also reasonable when compared to demographics and the market aggregate. The bank originated 19.7% of its home purchase loans in moderate-income census tracts by number and 11.9% by dollar compared to the demographic of the 2010 Census, which indicated that 23.3% of owner-occupied housing units were located in moderate-income census tracts. ESB's performance in moderate-income census tracts was below the market aggregate which made 24.2% of its home purchase loans in moderate-income census tracts by number and 17.1% by dollar in 2015. Home purchase lending performance in moderate-income census tracts in 2014 exceeded performance in 2015, while 2013 performance was comparable.

Refinance Loans

ESB's overall refinance lending distribution was considered reasonable give its performance in LMI census tracts with consideration to the demographic and performance context challenges, particularly related to the availability of owner-occupied housing in low-income census tracts in the assessment area.

ESB's refinance lending performance in low-income geographies was considered reasonable based on the performance context factors that indicated limited opportunities. Under the 2010 Census, 2.8% of owner-occupied housing units were in low-income census tracts. While ESB did not make any refinance loans in low-income census tracts, the market aggregate made only five or 0.9% by number and 0.4% by dollar volume of its refinance loans in low-income census tracts in 2015. ESB's 2014 and 2013 refinance lending performance in low-income census tracts was slightly better when compared to the market aggregate.

In contrast, ESB's refinance lending performance in moderate-income census tracts was excellent. In 2015, ESB originated 31.7% of its refinance loans in moderate-income census tracts by number and 25.1% by dollar volume compared to the demographic where 23.3% of owner-occupied housing units were located in moderate-income census tracts in this MSA. ESB's performance exceeded the market aggregate, which originated 22.3% of its refinance loans in moderate-income census tracts by number and 16.0% by dollar. ESB's 2014 refinance lending performance was also excellent while 2013 performance was reasonable.

Home Improvement Loans

ESB's overall home improvement lending performance in LMI geographies was considered excellent based on reasonable performance in low-income geographies and excellent performance in moderate-income geographies.

ESB's home improvement lending performance in low-income geographies was reasonable when considering performance context factors that made HMDA-related lending difficult in low-income geographies. According to the 2010 Census, 2.8% of owner-occupied housing units were located in low-income census tracts, indicating limited lending opportunities. ESB made 2.8% of its home improvement loans in low-income census tracts by number and 1.0% by dollar volume. ESB's performance was comparable to the market aggregate, which also made 2.8% of its home improvement loans by number and 1.6% by dollar in low-income census tracts in 2015. ESB's performance in 2014 and 2013 was comparable.

ESB's home improvement lending performance in moderate-income census tracts was excellent based on comparisons to demographics and the market aggregate. The bank originated 24.1% of its home improvement loans by number and 18.6% by dollar in moderate-income census tracts in 2015 given that 23.3% of owner-occupied housing units were located in moderate-income census tracts. ESB's performance was above the market aggregate, which originated 22.8% of its home improvement loans by number and 17.0% by dollar in moderate-income census tracts. The Bank's 2013 and 2014 home improvement lending performance exceeded to its performance in 2015 when compared to the market aggregate.

Consumer Loans

ESB's overall consumer lending performance in LMI geographies was reasonable in light of demographic data and performance context factors mentioned earlier. The Bank's consumer lending performance in low-income census tracts was considered poor. Based on the sample, ESB made a total of 23 consumer loans in this MSA in 2015, of which only one was made in low-income census tracts, or 4.3% by number and 8.0% by dollar volume. Based on the 2010 Census, only 6.0% of all households resided in low-income census tracts. ESB made no consumer loans in low-income census tracts in 2014 and 2013.

ESB's consumer lending performance in moderate-income census tracts was reasonable. ESB originated four or 17.4% of its consumer loans by number and 13.2% by dollar in moderate-income census tracts. Based on the 2010 Census, 29.0% of all households resided in moderate-income census tracts in this MSA. ESB's 2013 and 2014 consumer lending performance exceeded 2015 and was more comparable to demographic data.

Small Business Loans

ESB's overall small business lending performance in LMI geographies was reasonable when compared to D&B business establishment data and the market aggregate. Small business performance in low-income census tracts was reasonable as ESB made 20.0% of its small business loans in low-income census tracts by number and 19.6% by dollar volume, given that 13.3% of all businesses are located in low-income census tracts. ESB's performance was above the market aggregate which made 15.7% of its small business loans by number and 22.1% by dollar in low-income census tracts. ESB's performance in 2014 and 2013 was below its 2015 performance.

ESB's small business performance in moderate-income census tracts was excellent as ESB made 45.0% of its small business loans by number and 32.3% by dollar in moderate-income census tracts compared to 24.2% of businesses located in moderate-income census tracts. ESB's performance in moderate-income census tracts was above the market aggregate, which had 22.9% of its small business loans by number and 33.7% by dollar in moderate-income census tracts. ESB's performance in 2013 and 2014 was comparable to performance in 2015.

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

Lending performance in the assessment area showed excellent penetration among borrowers of all income levels, including LMI and businesses of different sizes. While housing is generally more affordable to moderate-income borrowers in the MSA, housing costs are approximately three to four times the income of low-income borrowers. Based upon this performance context consideration, HMDA-related lending to moderate-income borrowers was weighted more for this analysis. ESB's performance in lending to LMI borrowers and businesses of different sizes is summarized as follows.

Home Purchase Loans

ESB's overall lending distribution of home purchase loans to LMI borrowers was excellent based on reasonable distribution to low-income borrowers and excellent distribution to moderate-income borrowers.

In 2015, ESB made 14.6% of its home purchase loans by number and 7.9% by dollar volume to low-income borrowers while 22.1% of the families in the MSA were low-income. ESB's performance was above the market aggregate, which made 11.8% of its home purchase loans to low-income borrowers by number and 6.5% by dollar volume. ESB's performance in 2014 and 2013 was comparable to performance in 2015.

Performance in lending to moderate-income borrowers was excellent as 22.5% of ESB's home purchase loans by number and 14.7% by dollar volume were made to moderate-income borrowers while 16.6% of families in the MSA were moderate-income. ESB's performance was similar to the market aggregate which made 22.9% of its home purchase loans by number and 17.5% by dollar volume to moderate-income borrowers in 2015. ESB's 2013 and 2014 performance was better as it exceeded both demographic and market aggregate data.

Refinance Loans

ESB's overall distribution of refinance loans to LMI borrowers was excellent based on comparisons to demographics and the market aggregate.

ESB's distribution of refinance loans to low-income borrowers was reasonable as 12.7% of refinance loans were made to low-income borrowers by number and 7.4% by dollar volume while 22.1% of all families in the MSA were low-income. ESB's performance was above the

market aggregate which made 10.0% of refinance loans to low-income borrowers by number and 5.2% by dollar volume. ESB's 2014 and 2013 performance was comparable to 2015 in relation to the market aggregate.

ESB's distribution of refinance loans to moderate-income borrowers was excellent as 20.6% of refinance loans by number and 14.9% by dollar volume were made to moderate-income borrowers while 16.6% of all families in the MSA were moderate-income. ESB's performance was above the market aggregate by number and dollar volume as the market aggregate made 17.0% of its refinance loans to moderate-income borrowers by number and 11.6% by dollar volume. ESB's 2013 and 2014 performance was comparable to its 2015 performance in that it also exceeded demographics and the market aggregate.

Home Improvement Loans

ESB's overall distribution of home improvement loans to LMI borrowers was excellent based on comparisons to demographics and the market aggregate.

ESB's distribution to low-income borrowers was considered reasonable. In 2015, ESB made 14.2% of its home improvement loans by number and 8.1% by dollar to low-income borrowers while 22.1% of the families in the MSA were low-income. However, ESB's performance was above the market aggregate which made 12.3% of its home improvement loans to low-income borrowers by number and 7.3% by dollar volume. ESB's 2014 and 2013 performance was below its 2015 performance.

Performance in lending to moderate-income borrowers was excellent as 24.1% of ESB's home improvement loans were made to moderate-income borrowers by number and 15.4% by dollar which exceeded demographics which showed that 16.6% of families were moderate-income. ESB's performance was below the market aggregate, which made 26.3% of its home improvement loans to moderate-income borrowers by number and 17.5% by dollar in 2015. ESB's performance in 2014 was better than 2015 when compared to market aggregate and performance in 2013 was comparable to 2015.

Consumer Loans

ESB's overall distribution of consumer loans to LMI borrowers was excellent based on the distribution to both low- and moderate-income borrowers. Performance in lending to low-income borrowers was excellent. In the review period, ESB made 28.3% of its consumer loans by number and 22.1% by dollar volume to low-income borrowers while 24.6% of all households in the MSA were low-income. Performance in lending to moderate-income borrowers was also excellent as 25.0% of ESB's consumer loans by number and 23.9% by dollar were made to moderate-income borrowers compared to 17.0% of all households in the MSA that were moderate-income.

Small Business Loans

The overall level of lending to small businesses was reasonable. In 2015, ESB made 85.0% by number and 68.7% by dollar volume of its small business loans to businesses with GAR of \$1 million or less while 89.5% of all businesses in the MSA had GAR of \$1 million or less. ESB's lending performance was significantly above the aggregate, which made only 38.2% of its loans by number and 31.1% by dollar volume to businesses with GAR of \$1 million or less.

During 2015, 70.0% by number and 35.5% by dollar volume of ESB's loans were in amounts of \$100,000 or less, with an average loan amount of \$127,000. ESB's performance was below the aggregate which originated 88.5% of its loans by number and 24.9% by dollar volume in amounts of \$100,000 or less. Performance in 2013 and 2014 was comparable to that of 2015.

COMMUNITY DEVELOPMENT TEST

ESB's community development performance in MSA 21300 (Elmira, NY) demonstrated adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments, and services. This assessment of ESB's performance considered the bank's capacity and the need and availability of such opportunities in MSA 21300 (Elmira, NY). ESB's community developments loans and investments in MSA 21300 (Elmira, NY) is summarized in the table below.

Summary of Community Development Loans and Qualified Investments						
Assessment Area: MSA 21300						
April 1, 2013 - June 30, 2016						
Designation	Loans		Qualified Investments		TOTAL	
	(\$000)	%	(\$000)	%	(\$000)	%
Affordable Housing	\$0	0.0%	\$0	0.0%	\$0	0.0%
Community Services	\$1,961	95.1%	\$91	12.5%	\$2,052	73.6%
Economic Development	\$0	0.0%	\$0	0.0%	\$0	0.0%
Revitalize and Stabilize	\$100	4.9%	\$636	87.5%	\$736	26.4%
TOTAL	\$2,061	100.00%	\$727	100.0%	\$2,788	100.0%

Community Development activity includes new loans and investments made during the examination period as well as investments with existing balances from the prior examination period that were outstanding as of 6/30/2016.

The bank's overall community development loans and investment activity in MSA 21300 (Elmira, NY) totaled \$2.8 million. Of ESB's overall community development loans and investments, 28.9% were made in MSA 21300 (Elmira, NY). In addition, the MSA benefited from three qualified investments totaling \$472,000 in organizations that make qualified investments targeting affordable housing and economic development throughout the State of New York. The amount of community development loans and qualified investments made in MSA 21300 (Elmira, NY) declined 39.7% compared to the previous CRA evaluation.

Community Development Loans

Community development loans in MSA 21300 (Elmira, NY) totaled \$2.1 million. Community development lending was focused on the provision of community services and was responsive to identified credit needs. Of the total community development loan activity in the MSA, 95.1% went to community services while 4.9% went to revitalization and stabilization activities.

Examples of community development loans include:

- A \$390,000 loan to an organization that provides home health care services, family counseling services, including drug and alcohol, mental health clinics, and programs that promote personal development. The organization is located in a low-income census tract. Funding is primarily through Medicaid.
- Two loans totaling \$316,000 to an organization that provides community services to an LMI population of children and adults with disabilities. The organization offers residential and daily programs that help individuals achieve independence.
- A \$100,000 participation loan to provide working capital to an organization that is revitalizing downtown Elmira, NY. The project is also providing jobs to LMI individuals.

Community Development Investments

Community development investments and donations activity in MSA 21300 (Elmira, NY) consisted of \$636,000 in qualified investments and \$91,000 in grants and donations for community services. An example of a qualified investment is a \$611,000 outstanding commitment on an industrial development bond to revitalize the Clemens Center in downtown Elmira. The center is located in a low-income census tract and is a performing art and cultural center that hosts concerts, plays, and other major events. The center serves as a catalyst to develop the downtown area.

Community Development Services

ESB provided one financial seminar to organizations that furnish community development services to LMI individuals. Eight bank employees serve on the boards and committees of 19 community development organizations. Examples include:

- One officer is a board member and assistant treasurer of an economic development agency that: administers the Elmira Empire Zone, provides staff to the county's industrial development authority, administers local revolving funds for small business development and generally promotes economic development in Chemung County.

- One officer is a board member of a non-profit organization that provides technical assistance for the revitalization of Elmira's downtown business district which is in an LMI area.
- One employee serves as a member of the board of directors of a non-profit organization that provides meals to home-bound individuals.

METROPOLITAN AREA

MSA 27060 (Ithaca, NY)

Full Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 27060 (Ithaca, NY)

As of June 30, 2016, ESB operated three or 23.1% of its 13 branches in MSA 27060 (Ithaca, NY). These branches generated \$122 million in deposits, which accounts for 25.8% of the bank's branch deposits as of June 30, 2016. One branch was located in a moderate-income census tract. All branches provided a full range of financial services. ESB ranked third in terms of deposit market share (6.3%) in MSA 27060 (Ithaca, NY). Lead banks, in terms of deposit market share, included Tompkins Trust Company and Manufacturers and Traders Trust Company. Other key competitors in this MSA included Chemung Canal Trust Company, First Niagara Bank National Association, Community Bank National Association and Citizens Bank National Association.

Overall, 22.0% of the lending within the bank's assessment areas was made in MSA 27060 (Ithaca, NY). Of the Bank's total home purchase, refinance and home improvement loans originated in the assessment areas from 2013 through 2015, 22.7% were originated in this MSA. ESB ranked 3rd in terms of HMDA related lending market share in this MSA. Additionally, 19.6% of consumer loans and 6.1% of small business loans sampled were originated in this MSA. The MSA 27060 (Ithaca, NY) assessment area did not change from the previous evaluation. For additional assessment area data, see the Summary of Key Assessment Area Data table on page 5.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the 2010 Census, the U.S. Department of Labor, the New York State Department of Labor, the FFIEC, the NYSAR and D&B.

Demographic Characteristics

According to the 2010 Census, the population of MSA 27060 (Ithaca, NY) was 101,564. The MSA is comprised of Tompkins County. The City of Ithaca is the largest city in the MSA with a population of 30,014. Of the 23 census tracts located in MSA 27060 (Ithaca, NY), one, or 4.3%, was low-income and four, or 17.4%, were moderate-income.

Income Characteristics

According to the 2010 census, MSA 27060 (Ithaca, NY) had 19,798 families, of which 3,841 (19.4%) were low-income, 3,748 (18.9%) were moderate-income and 1,292 (6.5%) lived below the poverty level. As shown in the table to the right, the FFIEC-adjusted median family income for MSA 27060 (Ithaca, NY) was \$77,200 in 2015, declining from \$82,000 in 2013. These income levels are slightly above New York State’s 2015 FFIEC- adjusted median family income of \$72,000.

FFIEC MEDIAN FAMILY INCOMES			
	2013	2014	2015
MSA 27060	82,000	78,800	77,200

Housing Characteristics

MSA 27060 (Ithaca, NY) had 41,381 housing units, of which 51.1% were owner-occupied, 41.8% were rental, and 7.1% were vacant, as of the 2010 Census. Of the total owner-occupied housing units, 0.2% were located in low-income census tracts while 15.7% were located in moderate-income census tracts. The low number of owner-occupied units in the one low-income census tract limited ESB’s ability to make HMDA-related loans in that geography. Demographic information from the 2010 census estimated that the median age of the housing stock was 43 years.

Housing costs were comparatively low in MSA 27060 (Ithaca, NY), particularly when evaluating against the state average median sales price as shown in the table to the right. Nonetheless, housing affordability remained difficult for low- and moderate-income borrowers in the MSA. The median housing cost in the assessment area was about five times the median family income of a low-income borrower and three times the income of a moderate-income borrower.

MEDIAN HOUSING SALES PRICE			
Area	2013	2014	2015
MSA 27060	\$190,500	\$194,250	\$207,000
NYS	\$226,500	\$225,000	\$230,000
Source: NYS Assoc. of Realtors			

Labor, Employment and Economic Characteristics

The local economy was driven by the two institutions of higher learning in the City of Ithaca: Cornell University and Ithaca College. One in three jobs within the MSA 27060 (Ithaca, NY) was related to these two institutions. The students, faculty, and support staff all had a stabilizing effect on employment. As indicated in the table to the right, unemployment rates have remained stable and were below the rates for the state as a whole. The area was also home to some high-tech and small manufacturing companies. Long term economic trends indicated an increase in employment in education, health care and services.

U.S. DEPARTMENT OF LABOR ANNUAL UNEMPLOYMENT RATES			
Area	2013	2014	2015
MSA 27060	4.1%	3.7%	3.5%
NYS	6.7%	5.5%	4.7%

According to 2015 D&B data, MSA 27060 (Ithaca, NY) had a total of 4,148 business establishments, of which 91.4% were small businesses with GAR of less than or equal to \$1 million. Of the total businesses, 0.3% were located in low-income census tracts and 26.2% were located in moderate-income census tracts. The low number of businesses in low-income geographies would limit ESB's ability to make small business loans in that census tract. For additional assessment area details, see the Assessment Area Demographic Table below.

Assessment Area Demographics								
Assessment Area : MSA 27060								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.3	261	1.3	32	12.3	3,841	19.4
Moderate-income	4	17.4	3,044	15.4	335	11.0	3,748	18.9
Middle-income	11	47.8	11,860	59.9	751	6.3	4,042	20.4
Upper-income	6	26.1	4,607	23.3	274	3.8	8,167	41.3
Unknown-income	1	4.3	26	0.1	0	0.0	0	0.0
Total Assessment Area	23	100.0	19,798	100.0	1,292	6.5	19,798	100.0
Housing Units By Tract		Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	407	52	0.2	12.8	355	87.2	0	0.0
Moderate-income	6,479	3,325	15.7	51.3	2,689	41.5	465	7.2
Middle-income	22,137	13,199	62.4	59.6	7,541	34.1	1,397	6.3
Upper-income	12,323	4,572	21.6	37.1	6,678	54.2	1,073	8.7
Unknown-income	35	9	0.0	25.7	26	74.3	0	0.0
Total Assessment Area	41,381	21,257	100.0	51.1	17,289	41.8	2,935	7.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	14	0.3	13	0.3	1	0.3	0	0.0
Moderate-income	1,087	26.2	989	26.1	87	27.3	11	28.2
Middle-income	2,076	50.0	1,931	50.9	123	38.6	22	56.4
Upper-income	965	23.3	851	22.5	108	33.9	6	15.4
Unknown-income	6	0.1	6	0.2	0	0.0	0	0.0
Total Assessment Area	4,148	100.0	3,790	100.0	319	100.0	39	100.0
Percentage of Total Businesses:				91.4		7.7		0.9

Based on 2015 FFIEC Census Data 2015 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 27060 (ITHACA, NY)

LENDING TEST

Lending performance in MSA 27060 (Ithaca, NY) is considered reasonable based on a reasonable geographic distribution of lending and excellent penetration among individuals of different income levels and businesses of different sizes. The greatest weight based on number and volume was given to HMDA lending followed by consumer and small business lending. In addition, ESB's lending performance was compared to the 2015 aggregate of all lenders required to report HMDA and small business data within the assessment area. Performance in 2013 and 2014 was compared to aggregate data for 2013 and 2014 respectively. See the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of ESB's 2015, 2014 and 2013 loan distribution by geography, borrower income and business revenue size.

Geographic Distribution of Loans

The overall geographic distribution of HMDA-related and small business loans reflected reasonable loan penetration across census tracts of different income levels in MSA 27060 (Ithaca, NY). Conclusions were based primarily on performance in moderate-income tracts as there is only one low-income tract in the MSA with 0.2% of all owner-occupied housing units and 0.3% of business establishments located in that tract. ESB did not make any loans in this census tract. For the evaluation period, the market aggregate made less than 1.0% of its loans in the low-income census tract, which emphasizes the limited opportunities for HMDA and small business lending in that geography. There were no other conspicuous gaps in lending. Home purchase, refinance, small business, and consumer lending in moderate-income census tracts was reasonable, while home improvement performance was excellent. Performance in 2013 and 2014 was comparable to 2015 performance with regard to geographic distribution.

Home Purchase Loans

ESB's home purchase lending in moderate-income census tracts was reasonable based on comparisons to demographic and market aggregate data. ESB originated 12.7% of its home purchase loans by number and 12.2% by dollar volume in moderate-income census tracts in 2015 compared to the 15.7% of owner-occupied housing units that were located in moderate-income census tracts. ESB's performance in moderate-income census tracts was above the market aggregate, which made 11.6% of its home purchase loans by number and 8.9% by dollar volume in moderate-income geographies in 2015. Performance in 2013 and 2014 was comparable to the performance in 2015.

Refinance Loans

ESB's refinance lending in moderate-income census tracts was reasonable based on comparisons to demographic and market aggregate data. ESB originated 14.6% of its refinance loans by number and 11.5% by dollar volume in moderate-income census tracts in 2015 compared to the 15.7% of owner-occupied housing units that are located in moderate-income census tracts. Performance was above the market aggregate, which originated 13.5% of its refinance loans by number and 9.6% by dollar volume in moderate-income census tracts. ESB's 2014's refinance performance was excellent compared to demographic and aggregate data and 2013 refinance lending performance was comparable to 2015 performance.

Home Improvement Loans

ESB's home improvement lending distribution was excellent based on comparisons to demographic and market aggregate data. ESB originated 24.5% of its home improvement loans by number and 24.2% by dollar volume in moderate-income census tracts in 2015 compared to the 15.7% of owner-occupied housing units that were located in moderate-income census tracts. ESB's performance was above the market aggregate, which originated 16.8% of its home improvement loans by number and 13.4% by dollar volume in moderate-income census tracts. ESB's 2013 and 2014 home improvement lending performance was also excellent and comparable to 2015 performance.

Consumer Loans

ESB's overall consumer lending performance was reasonable compared to demographic data. In 2015, ESB originated 27.3% of its consumer loans by number and 19.9% by dollar volume in moderate-income tracts while, 15.6% percent of all households in MSA 27060 (Ithaca, NY) resided in moderate-income census tracts. ESB's performance in 2013 exceeded that of 2015; however the bank did not make any consumer loans in moderate-income tracts in 2014.

Small Business Loans

Overall, small business lending performance was reasonable. ESB made 50% of its small business loans by number and 63.8% in terms of dollars in moderate-income census tracts compared to 26.2% of business establishments located in moderate-income census tracts. ESB's performance in moderate-income census tracts was significantly above the market aggregate, which made 23.5% of its small business loans and 25.8% in terms of dollars in moderate-income census tracts. ESB's performance in 2013 and 2014 was below 2015's performance as ESB did not make any small business loans in moderate-income census tracts.

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

Overall, the lending performance in the assessment area related to borrower distribution was reasonable, and reflected good penetration among individuals of all income levels (including LMI) and businesses of different sizes. In this assessment area, median housing costs were five

times the income of low-income borrowers, which is a performance context consideration for this analysis.

Home Purchase Loans

ESB's overall distribution of home purchase loans to LMI borrowers was reasonable based on comparisons to demographic and the market aggregate data. The distribution to low-income borrowers was reasonable. In 2015, ESB made 7.3% of its home purchase loans by number and 4.5% by dollar to low-income borrowers while 19.4% of the families in the MSA were of low-income. ESB's performance was below the market aggregate, which made 9.1% of its home purchase loans to low-income borrowers by number and 4.1% by dollar. ESB's performance to low-income borrowers in 2013 and 2014 exceeded the market aggregate but was below demographics.

Performance in lending to moderate-income borrowers was excellent as 27.3% of ESB's home purchase loans by number and 20.6% by dollar were made to moderate-income borrowers compared to the 18.9% of families in the MSA that were of moderate-income. ESB's performance was above the market aggregate which made 21.3% of its home purchase loans by number and 14.8% by dollar were to moderate-income borrowers in 2015. ESB's 2013 home purchase performance to moderate-income borrowers was comparable while 2014's performance was reasonable as it was below the market aggregate.

Refinance Loans

ESB's overall distribution of refinance loans to LMI borrowers was excellent based on a reasonable distribution to low-income borrowers and an excellent distribution to moderate-income borrowers. ESB's distribution of refinance loans to low-income borrowers was reasonable. In 2015, ESB made 2.4% of its refinance loans by number and 0.8% by dollar to low-income borrowers, while 19.4% of all families in the MSA were of low-income. ESB's performance was significantly below the market aggregate which made 6.0% of its refinance loans to low-income borrowers by number and 2.8% by dollar. Refinance loan performance to low-income borrowers in 2014 and 2013 exceeded the market aggregate and in 2014 also exceeded demographics.

ESB's distribution of refinance loans to moderate-income borrowers was excellent as 22.0% of refinance loans by number and 14.2% by dollar were made to moderate-income borrowers compared to the 18.9% of all families in the MSA that were of moderate-income. ESB's performance was above the market aggregate, which made 18.8% of its refinance loans to moderate-income borrowers by number and 12.7% by dollar. ESB's 2013 and 2014 performance was comparable to 2015.

Home Improvement Loans

ESB's overall distribution of home improvement loans was reasonable based on the distribution to low- and moderate-income borrowers. Performance in home improvement lending to low-

income borrowers was reasonable. In 2015, ESB made 5.7% of its home improvement loans by number and 7.4% by dollar to low-income borrowers while 19.4% of the families in the MSA were of low-income. ESB's performance was below the market aggregate, which made 16.5% of its home improvement loans to low-income borrowers by number and 5.9% by dollar. Performance to low-income borrowers in 2013 was similar to 2015's performance while in 2014 it exceeded both demographic and market aggregate data.

Performance in home improvement lending to moderate-income borrowers was poor as 11.3% of ESB's home improvement loans were made to moderate-income borrowers by number and 2.7% by dollar while 19.4% of families are of moderate income. ESB's performance was below the market aggregate, which made 21.3% of its home improvement loans to moderate-income borrowers by number and 11.8% by dollar in 2015. ESB's 2014 performance was similar to its 2015 performance but performance in 2013 was better in that it exceeded demographics.

Consumer Loans

ESB's overall distribution of consumer loans to LMI borrowers was reasonable based on a comparison to demographic data. Consumer loan distribution to low-income borrowers was reasonable. In the review period, ESB made 36.7% of its consumer loans by number and 20.8% by dollar volume to low-income borrowers while 25.3% of all households in the assessment area were low-income. Performance in lending to moderate-income borrowers was also reasonable as in the review period ESB made 13.6% of its consumer loans by number and 11.0% by dollar volume to moderate-income borrowers while 15.0% of all households were of moderate-income.

Small Business Loans

The overall level of lending to small businesses was reasonable although volume was limited based on the loan sample. In 2015, ESB made 75.0% by number and 93.1% by dollar volume of its small business loans to businesses with GAR of \$1 million or less while 91.4% of business establishments in the MSA had GAR of \$1 million or less. Performance was above the aggregate, which made 51.6% by number and 52.5% by dollar volume of its loans to businesses with GAR of \$1 million or less. In both 2014 and 2013, ESB made only one small business loan in each year and they were all made to businesses with GAR of less than \$1 million.

During 2015, 25.0% of ESB's loans were in amounts of \$100,000 or less. ESB's performance was below the aggregate, which originated 89.6% of its loans in amounts of \$100,000 or less. ESB made no loans in amounts of \$100,000 or less in both 2014 and 2013.

COMMUNITY DEVELOPMENT TEST

ESB's community development performance in MSA 27060 (Ithaca, NY) demonstrated adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments and services. This assessment of ESB's performance considered the bank's capacity, the need, and availability of such opportunities in MSA 27060 (Ithaca, NY).

The bank's overall community development loan and investment activity in MSA 27060 (Ithaca, NY) totaled \$16,700 consisting entirely of donations and grants to non-profit organizations providing affordable housing and community services. In addition, the MSA also benefited from three qualified investments totaling \$472,000 in organizations that make qualified investments targeting affordable housing and economic development throughout the State of New York. The amount of qualified investments made in MSA 27060 (Ithaca, NY) increased 178.3% compared to the previous CRA evaluation.

ESB also provided a total of four community development services during the current evaluation period, which included two officers that were members of the board of directors of the Regional Economic Development Corporation a corporation that provides a low cost loan program for businesses requiring additional capital financing.

NON-METROPOLITAN AREA
Cayuga, Schuyler, Seneca, and Steuben Counties

Full Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-METROPOLITAN ASSESSMENT AREA (Cayuga, Schuyler, Seneca, and Steuben, Counties, NY)

As of December 31, 2015, ESB operated four or 30.8% of its 13 branches in the Non-metropolitan assessment area. Two full service branches were located in Steuben County and one each were in Cayuga and Schuyler Counties. All branches provided a full range of financial services. None of the branches were located in LMI census tracts. As of June 30, 2016, 17.4% of ESB's deposits were held in this assessment area. With a deposit market share of 0.95%, ESB was the 12th largest depository institution. Lead banks, in terms of deposit market share, include Five Star Bank, Community Bank National Association, Chemung Canal Trust Co., First Niagara Bank National Association, Steuben Trust Company, Tompkins Trust Company, Generations Bank and Manufacturers and Traders Trust Company.

Overall, 28.9% of the lending within the bank's assessment areas was made in the Non-metropolitan assessment area. Of the bank's total home purchase, refinance and home improvement loans from 2013 through 2015 in its assessment areas, 29.2% were originated in the Non-metropolitan assessment area. ESB ranked 4th in terms of HMDA related lending market share in this assessment area. Of the sample of small business and consumer loans, 24.2% and 26.8% were originated in this assessment area respectively. The Non-metropolitan assessment area did not change from the previous evaluation. For additional assessment area data, see the Summary of Key Assessment Area Data table.

PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the 2010 Census, the U.S. Department of Labor, the New York State Department of Labor, the FFIEC, the NYSAR and D&B.

Demographic Characteristics

The Non-metropolitan assessment area encompassed all of Schuyler and Steuben counties and portions of Cayuga and Seneca counties. The four contiguous counties are located in the Southern Tier and Finger Lakes regions of New York State. These counties are primarily rural with towns and villages scattered across the assessment area.

Based on the 2010 Census, of the 42 census tracts in the assessment, none were low-income, three or 7.1% were moderate-income, 34 or 81.0% were middle-income, five or 11.9% were upper-income. Within the Non-metropolitan assessment area, four of the five census tracts in Schuyler County met the FFIEC's definition of underserved middle-income census tracts for remote rural areas. According to the 2010 Census, the Non-metropolitan assessment area's

population totaled 147,942. The Non-metropolitan assessment area contained 43.7% of the bank’s combined assessment area population.

Income Characteristics

The FFIEC-adjusted median family income for the various counties in the Non-metropolitan assessment area ranged from \$58,300 to \$63,500 in 2015. Under the 2010 Census data, the assessment area had 39,163 families, of which 18.3% were low-income, 18.8% were moderate-income and 8.6% had incomes below the poverty level.

FFIEC MEDIAN FAMILY INCOMES			
County	2013	2014	2015
Cayuga County	\$59,600	\$62,600	\$63,500
Schuyler County	\$57,700	\$57,300	\$61,200
Seneca County	\$57,200	\$57,700	\$63,200
Steuben County	\$59,100	\$54,500	\$58,300

Housing Characteristics

The Non-metropolitan assessment area contained 70,992 housing units, of which 62.0% were owner-occupied. Only 4.7% of the owner-occupied housing units were in the moderate-income census tracts. According to the NYSAR, the median sales price of homes ranged from a low of \$101,000 in Steuben County in 2015 to a high of \$135,000 in Schuyler County in 2015. Demographic information from the 2010 Census estimated the median age of the housing stock throughout the assessment area to be 54 years.

MEDIAN SELLING PRICES			
County	2013	2014	2015
Cayuga County	\$110,000	\$117,250	\$110,500
Schuyler County	\$130,000	\$129,000	\$135,000
Seneca County	\$117,000	\$103,000	\$111,785
Steuben County	\$108,800	\$105,000	\$101,000

Source: NYS Association of Realtors

In 2015, the median housing costs in the various counties comprising the Non-metropolitan assessment area ranged from three to five times the median family income of a low-income borrower, indicating that housing affordability may be difficult for some low-income individuals.

Labor, Employment and Economic Characteristics

According to the NYS Department of Labor the economy for the counties in the Non-metropolitan assessment area has steadily improved from the economic downturn of the last national recession. Over the five year period ending December 31, 2014 private sector job growth had increased 4.2%. Expansion of the tourist industry in Cayuga and Schuyler Counties, improvements in manufacturing, and ongoing strength in higher education and dairy manufacturing industries have helped to improve the region’s employment base.

U.S. DEPARTMENT OF LABOR ANNUAL UNEMPLOYMENT RATES			
Area	2013	2014	2015
Cayuga County	6.5	5.6	5.2
Schuyler County	8.1	7.3	6.9
Seneca County	6.0	5.6	5.1
Steuben County	7.3	5.7	6.2
New York State	6.7	5.5	4.7

In 2015, the Non-metropolitan assessment area had 5,256 business establishments, of which 91.2% were small businesses with GAR of less than or equal to \$1 million. Of the total businesses, 6.1% were located in moderate-income census tracts.

Community Contacts

In order to learn more about community credit needs, examiners conducted an interview with a nonprofit organization that provides social services throughout Chemung, Steuben, Tompkins and Schuyler Counties in New York. The contact stated that, despite the slow-down in the search and development of natural gas in Pennsylvania, rents remained high and there was a need for affordable rental housing. The contact stated that all counties had an aging population, continued to lose population, and faced substance abuse issues, which the nonprofit organization, was focusing on. Much of Steuben and Schuyler counties are rural with large pockets of poverty. In addition, Schuyler County was faced with a large migrant and seasonal worker population supporting the tourist and wine industries. As a result, there is a demand for basic needs such as food, clothing and shelter which was being met through food pantries and housing assistance programs offered through this nonprofit organization.

For additional assessment area details, see the Assessment Area Demographics Table on the following page.

Assessment Area Demographics								
Non-metropolitan Assessment Area								
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	0	0.0	7,184	18.3
Moderate-income	3	7.1	2,060	5.3	342	16.6	7,358	18.8
Middle-income	34	81.0	31,366	80.1	2,698	8.6	8,984	22.9
Upper-income	5	11.9	5,737	14.6	322	5.6	15,637	39.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	42	100.0	39,163	100.0	3,362	8.6	39,163	100.0
	Housing Units By Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	4,085	2,051	4.7	50.2	1,528	37.4	506	12.4
Middle-income	57,395	35,597	80.9	62.0	10,803	18.8	10,995	19.2
Upper-income	9,512	6,342	14.4	66.7	1,842	19.4	1,328	14.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	70,922	43,990	100.0	62.0	14,173	20.0	12,829	18.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	318	6.1	291	6.1	26	8.3	1	0.7
Middle-income	4,231	80.5	3,849	80.3	250	79.4	132	88.0
Upper-income	707	13.5	651	13.6	39	12.4	17	11.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,256	100.0	4,791	100.0	315	100.0	150	100.0
Percentage of Total Businesses:				91.2		6.0		2.9

Based on 2015 FFIEC Census Data 2015 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN ASSESSMENT AREA (Cayuga, Schuyler, Seneca, and Steuben, Counties, NY)

LENDING TEST

Lending performance in the Non-metropolitan assessment area is considered reasonable based on geographic and borrower distribution. The greatest weight based on number and volume was given to HMDA lending, followed by consumer and small business lending. In addition, ESB's lending performance was compared to the 2015 aggregate of all lenders required to report HMDA and small business data within the assessment area. Performance in 2013 and 2014 was compared to aggregate data for 2013 and 2014 respectively. See the Aggregate Comparison Loan Distribution tables and the Consumer Loan Distribution tables in CRA Appendix A for details of ESB's 2015, 2014 and 2013 loan distribution by geography, borrower income and business revenue size.

Geographic Distribution of Loans

Overall, ESB penetrated 97.6% of the census tracts in the assessment area. The assessment area consisted of three moderate-income census tracts, 34 middle-income census tracts, and five upper-income census tracts. There are no low-income census tracts. While all three moderate-income census tracts had loan activity in the review period, only 4.7% of the owner-occupied units in the assessment area are located in these geographies. The low percentage of owner-occupied units in moderate-income census tracts and competition in the assessment area are performance context considerations. Loan penetration was also good in the four underserved middle-income tracts in Schuyler County. Overall, ESB's geographic distribution of lending was considered reasonable.

Home Purchase

ESB's overall home purchase lending distribution was reasonable considering performance context factors. In 2015, ESB originated 1.9% of its home purchase loans by number and 1.2% by dollar volume in moderate-income census tracts. This was below the demographics, which indicated that 4.7% of owner-occupied housing units are located in moderate-income census tracts. ESB's performance in moderate-income census tracts was significantly below the market aggregate, which made 4.7% of its home purchase loans by number and 3.0% by dollar volume in moderate-income geographies in 2015. However, in 2014, ESB's performance exceeded the market aggregate and in 2013 it was similar to the market aggregate, which supported the reasonable assessment.

Refinance Loans

ESB's overall refinance lending in moderate-income census tracts was reasonable considering performance context factors. ESB did not originate any refinance loans in moderate-income

geographies in 2015. Performance was below the market aggregate which originated 4.4% by number and 3.5% by dollar volume of its refinance loans in moderate-income census tracts. However, performance in both 2013 and 2014 was better than 2015's performance. In 2014, ESB's performance exceeded the market aggregate and in 2013 it was similar to the market aggregate, which supported the reasonable assessment.

Home Improvement Loans

ESB's overall home improvement lending distribution in 2015 was reasonable considering performance context factors. ESB originated 2.0% of its home improvement loans by number and 0.9% by dollar in moderate-income census tracts in 2015, compared to 4.7% of owner-occupied housing units located in moderate-income census tracts in the Non-metropolitan assessment area. ESB's performance was below the market aggregate, which originated 4.0% of its home improvement loans in moderate-income census tracts by number and 2.5% by dollar. ESB's performance in 2013 exceeded the market aggregate. However, in 2014, the bank did not make any home improvement loans in moderate-income census tracts.

Consumer Loans

ESB's overall consumer lending performance was reasonable considering the performance context. During the review period, ESB made 3.3% of its consumer loans by number and 17.5% by dollar amount in moderate-income census tracts while 6.2% of all households in the Non-metropolitan assessment area reside in moderate-income census tracts.

Small Business Loans

Overall, small business lending performance was poor. ESB did not make any of its small business loans in moderate-income census tracts in 2015 or 2014. According to D&B, 6.1% of business establishments in the assessment area were located in moderate-income census tracts. The market aggregate in 2015 and 2014 showed some lending in the moderate-income census tracts. In 2013, ESB made one small business loan in a moderate-income tract.

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

Lending performance in the Non-metropolitan assessment area related to borrower distribution was reasonable overall based on penetration among individuals of all income levels (including LMI) and businesses of different sizes. While housing is generally affordable to moderate-income borrowers in the MSA, housing costs are generally 3 to 5 times the income of low-income borrowers.

The bank's performance in lending to low- and moderate- income borrowers and businesses of different sizes is summarized below.

Home Purchase Loans

ESB's overall distribution of home purchase loans to LMI borrowers was reasonable, based on the distribution to low- and moderate-income borrowers. ESB's distribution of home purchase loans to low-income borrowers was poor. In 2015, ESB made 3.9% of its home purchase loans by number and 1.8% by dollar volume to low-income borrowers while 18.3% of families in the Non-metropolitan assessment area were low-income. ESB's performance was below the market aggregate, which made 6.1% by number and 3.2% by dollar volume of its home purchase loans to low-income borrowers. Performance in 2014 was comparable to that of 2015 but performance in 2013 exceeded the market aggregate.

Performance in lending to moderate-income borrowers was excellent. In 2015, 22.7% of ESB's home purchase loans by number and 14.6% by dollar volume were made to moderate-income borrowers while 18.8% of families in the Non-metropolitan assessment area were of moderate-income. ESB's performance was above the market aggregate, which made 20.6% of its home purchase loans by number and 14.0% by dollar volume to moderate-income borrowers in 2015. ESB's 2013 and 2014 performance was comparable to the performance in 2015.

Refinance Loans

ESB's overall distribution of refinance loans to LMI borrowers was reasonable, based on the distribution to low- and moderate-income borrowers. ESB's distribution of refinance loans to low-income borrowers was poor. In 2015, 7.0% of refinance loans by number and 3.6% by dollar volume were made to low-income borrowers while 18.3% of families in the Non-metropolitan assessment area were of low-income. ESB's performance was slightly above the market aggregate, which made 5.7% of its refinance loans by number and 2.9% by dollar volume to low-income borrowers. Performance in 2013 was comparable to the performance in 2015; however, ESB made no refinance loans to low-income borrowers in 2014.

ESB's distribution of refinance loans to moderate-income borrowers was reasonable as 16.3% of refinance loans by number and 11.1% by dollar volume were made to moderate-income borrowers while 18.8% of all families in the Non-metropolitan assessment area were of moderate-income. ESB's performance was similar to the market aggregate, which made 16.3% of its refinance loans by number and 11.0% by dollar volume to moderate-income borrowers. ESB's 2013 performance was comparable to the performance in 2015; however, performance in 2014 exceeded demographic and market aggregate data.

Home Improvement Loans

ESB's overall distribution of home improvement loans to LMI borrowers was reasonable, based on the distribution to low- and moderate-income borrowers. In 2015, ESB made 16.3% of its home improvement loans by number and 9.7% by dollar volume to low-income borrowers while 18.3% of families in the Non-metropolitan assessment area were low-income. ESB's performance was above the market aggregate, which made 15.1% of its home improvement

loans by number and 7.6% by dollar volume to low-income borrowers. ESB's 2013 and 2014 performance was below the performance in 2015.

Performance in lending to moderate-income borrowers was excellent. In 2015, ESB made 24.5% of its home improvement loans by number and 22.2% by dollar to moderate-income borrowers while 18.8% of families in the Non-metropolitan assessment area were moderate-income. Performance was similar to the market aggregate which made 25.5% and 15.6% by dollar volume of its home improvement loans to moderate-income borrowers in 2015. ESB's 2014 performance was comparable to the performance in 2015 and 2013 was below both demographic and market aggregate data.

Consumer Loans

ESB's overall distribution of consumer loans to LMI borrowers was reasonable based on a comparison to demographic data. Consumer loan distribution to low-income borrowers was reasonable. In the review period, ESB made 23.3% of its consumer loans by number and 20.5% by dollar volume to low-income borrowers while 22.1% of all households in the assessment area were low-income. Performance in lending to moderate-income borrowers was excellent as in the review period ESB made 33.3% of its consumer loans by number and 19.8% by dollar volume to moderate-income borrowers while 16.7% of all households were of moderate-income.

Small Business Loans

The overall level of lending to small businesses was reasonable. During 2015, ESB made 70.0% of its small business loans by number and 47.1% by dollar volume to businesses with GAR of \$1 million or less, compared to 91.2% of business establishments in the Non-metropolitan assessment area with GAR of \$1 million or less. Performance was above the aggregate which made 52.2% by number and 40.8% by dollar volume of its loans to businesses with GAR of \$1 million or less. Performance in 2013 was comparable to performance in 2015 while 2014's performance was poor compared to market aggregate and D&B establishment data.

During 2015, 60.0% of ESB's loans were in amounts of \$100,000 or less, with an average loan size of \$41,000. ESB's performance was below the aggregate which originated 91.8% of its loans in amounts of \$100,000 or less. Performance in 2014 and 2013 was comparable to performance in 2015.

COMMUNITY DEVELOPMENT TEST

ESB's community development performance in the Non-metropolitan assessment area demonstrated adequate responsiveness to the community development needs of the assessment area through community development loans, qualified investments and services. This assessment of ESB's performance considered the bank's capacity and the need and availability of such opportunities in the Non-metropolitan assessment area.

ESB's community development activity in the Non-metropolitan assessment area consisted of a \$3.8 million participation in the outstanding balance of an industrial development bond that was used to construct affordable housing at Corning Community College. Additionally, ESB made nine grants and donations totaling \$18,000 to organizations providing community services in the Non-metropolitan assessment area. In addition, the Non-metropolitan assessment area also benefited from three qualified investments totaling \$472,000 in organizations that make qualified investments targeting affordable housing and economic development throughout the State of New York. Affordable housing and community services are an identified need in this assessment area. The amount of qualified investments made in the Non-metropolitan assessment area increased 171.4% compared to the previous CRA evaluation.

ESB also provided a total of two community development services during the current evaluation period. One officer was a board member of an organization that promoted and assisted with independent living for people with disabilities and the homeless in Cayuga County and another officer was a member of the board of directors of an organization that promoted economic development in Steuben County.

CRA APPENDIX A
2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
	Home Purchase									
Low	3	1.7%	0.7%	1.6%	0.8%	26	14.6%	7.9%	11.8%	6.5%
Moderate	35	19.7%	11.9%	24.2%	17.1%	40	22.5%	14.7%	22.9%	17.5%
Middle	66	37.1%	34.3%	38.2%	34.8%	49	27.5%	25.7%	26.2%	25.9%
Upper	74	41.6%	53.2%	36.1%	47.3%	62	34.8%	51.4%	25.7%	38.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	0.3%	13.4%	12.0%
Total	178	100.0%	100.0%	100.0%	100.0%	178	100.0%	100.0%	100.0%	100.0%
	Refinance									
Low	0	0.0%	0.0%	0.9%	0.4%	8	12.7%	7.4%	10.0%	5.2%
Moderate	20	31.7%	25.1%	22.3%	16.0%	13	20.6%	14.9%	17.0%	11.6%
Middle	25	39.7%	32.5%	34.7%	31.0%	20	31.7%	33.2%	24.7%	22.5%
Upper	18	28.6%	42.3%	42.1%	52.6%	17	27.0%	37.5%	40.4%	52.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	7.9%	7.0%	7.9%	8.2%
Total	63	100.0%	100.0%	100.0%	100.0%	63	100.0%	100.0%	100.0%	100.0%
	Home Improvement									
Low	4	2.8%	1.0%	2.8%	1.6%	20	14.2%	8.1%	12.3%	7.3%
Moderate	34	24.1%	18.6%	22.8%	17.0%	34	24.1%	15.4%	26.3%	17.5%
Middle	56	39.7%	37.0%	38.3%	38.4%	36	25.5%	19.6%	28.0%	29.4%
Upper	47	33.3%	43.4%	36.0%	43.0%	48	34.0%	52.5%	30.3%	39.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.1%	4.5%	3.0%	6.4%
Total	141	100.0%	100.0%	100.0%	100.0%	141	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%	7.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	50.0%	92.9%	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	7	1.8%	0.6%	1.8%	0.7%	54	14.1%	7.8%	11.5%	5.7%
Moderate	89	23.3%	14.9%	23.3%	16.0%	87	22.8%	14.8%	22.3%	14.5%
Middle	147	38.5%	34.2%	37.3%	38.5%	105	27.5%	26.5%	26.3%	23.3%
Upper	139	36.4%	50.3%	37.6%	44.8%	127	33.2%	49.0%	31.0%	39.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	2.4%	1.9%	8.9%	17.2%
Total	382	100.0%	100.0%	100.0%	100.0%	382	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS									
	By Tract Income									
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Low	4	20.0%	19.6%	15.7%	22.1%					
Moderate	9	45.0%	32.3%	22.9%	33.7%					
Middle	4	20.0%	28.4%	31.1%	19.7%					
Upper	3	15.0%	19.6%	29.0%	23.9%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.3%	0.5%					
Total	20	100.0%	100.0%	100.0%	100.0%					
	By Revenue									
\$1 Million or Less	17	85.0%	68.7%	38.2%	31.1%					
	By Loan Size									
\$100,000 or less	14	70.0%	35.5%	88.5%	24.9%					
\$100,001-\$250,000	4	20.0%	27.2%	4.9%	15.5%					
\$250,001-\$1 Million	2	10.0%	37.3%	6.5%	59.6%					
Total	20	100.0%	100.0%	100.0%	100.0%					

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area: MSA 21300 - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	1	4.3%	21	8.0%	7	30.4%	57	21.6%
Moderate	4	17.4%	35	13.2%	7	30.4%	63	24.1%
Low/Moderate Total	5	21.7%	56	21.2%	14	60.9%	120	45.8%
Middle	7	30.4%	53	20.0%	6	26.1%	60	22.7%
Upper	11	47.8%	154	58.8%	3	13.0%	83	31.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	262	100.0%	23	100.0%	262	100.0%

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: 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%	8	7.3%	4.5%	9.1%	4.1%
Moderate	14	12.7%	12.2%	11.6%	8.9%	30	27.3%	20.6%	21.3%	14.8%
Middle	79	71.8%	67.2%	64.1%	56.1%	32	29.1%	29.9%	23.9%	22.0%
Upper	17	15.5%	20.5%	24.1%	34.7%	39	35.5%	44.4%	39.6%	50.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.9%	0.6%	6.0%	8.7%
Total	110	100.0%	100.0%	100.0%	100.0%	110	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.4%	0.8%	6.0%	2.8%
Moderate	6	14.6%	11.5%	13.5%	9.6%	9	22.0%	14.2%	18.8%	12.7%
Middle	21	51.2%	38.6%	62.4%	52.8%	11	26.8%	24.9%	24.8%	18.7%
Upper	14	34.1%	49.9%	24.1%	37.6%	20	48.8%	60.2%	44.0%	52.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.4%	13.1%
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%	3	5.7%	7.4%	16.5%	5.9%
Moderate	13	24.5%	24.2%	16.8%	13.4%	6	11.3%	2.7%	21.3%	11.8%
Middle	34	64.2%	41.9%	67.1%	50.3%	21	39.6%	33.0%	25.8%	19.0%
Upper	6	11.3%	33.8%	16.1%	36.3%	23	43.4%	56.9%	35.5%	57.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.0%	5.5%
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%	0.0%	0.0%
Moderate	1	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%	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%	12	5.9%	3.6%	9.4%	2.4%
Moderate	34	16.6%	13.4%	13.5%	8.9%	45	22.0%	17.7%	20.2%	8.9%
Middle	134	65.4%	57.4%	63.5%	38.1%	64	31.2%	28.4%	24.1%	13.2%
Upper	37	18.0%	29.2%	22.9%	52.8%	82	40.0%	49.0%	39.3%	32.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.0%	1.3%	6.9%	42.9%
Total	205	100.0%	100.0%	100.0%	100.0%	205	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%		0.4%	0.2%		
Moderate	2	50.0%	63.8%				23.5%	25.8%		
Middle	1	25.0%	0.6%				46.7%	40.9%		
Upper	1	25.0%	35.6%				27.3%	32.9%		
Unknown	0	0.0%	0.0%				0.1%	0.0%		
Tract Unknown	0	0.0%	0.0%				2.1%	0.3%		
Total	4	100.0%	100.0%				100.0%	100.0%		
By Revenue										
\$1 Million or Less	3	75.0%	93.1%				51.6%	52.5%		
By Loan Size										
\$100,000 or less	1	25.0%	0.6%				89.6%	28.6%		
\$100,001-\$250,000	1	25.0%	6.9%				5.5%	20.1%		
\$250,001-\$1 Million	2	50.0%	92.5%				4.9%	51.3%		
Total	4	100.0%	100.0%				100.0%	100.0%		

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area: MSA 27060 - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	5	45.5%	37	35.4%
Moderate	3	27.3%	21	19.9%	0	0.0%	0	0.0%
Low/Moderate Total	3	27.3%	21	19.9%	5	45.5%	37	35.4%
Middle	5	45.5%	40	37.4%	2	18.2%	13	12.4%
Upper	3	27.3%	45	42.7%	2	18.2%	35	33.2%
Unknown	0	0.0%	0	0.0%	2	18.2%	20	19.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	106	100.0%	11	100.0%	106	100.0%

2015 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: Non-Metropolitan Area

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	3.9%	1.8%	6.1%	3.2%
Moderate	3	1.9%	1.2%	4.7%	3.0%	35	22.7%	14.6%	20.6%	14.0%
Middle	114	74.0%	72.0%	75.9%	74.2%	45	29.2%	23.9%	23.7%	20.3%
Upper	37	24.0%	26.9%	19.4%	22.9%	67	43.5%	59.1%	37.6%	52.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	0.6%	12.0%	10.4%
Total	154	100.0%	100.0%	100.0%	100.0%	154	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	3	7.0%	3.6%	5.7%	2.9%
Moderate	0	0.0%	0.0%	4.4%	3.5%	7	16.3%	11.1%	16.3%	11.0%
Middle	31	72.1%	72.9%	76.1%	74.6%	8	18.6%	15.9%	25.5%	21.0%
Upper	12	27.9%	27.1%	19.5%	21.9%	24	55.8%	66.9%	43.2%	53.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.3%	2.5%	9.2%	12.0%
Total	43	100.0%	100.0%	100.0%	100.0%	43	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	8	16.3%	9.7%	15.1%	7.6%
Moderate	1	2.0%	0.9%	4.0%	2.5%	12	24.5%	22.2%	25.5%	15.6%
Middle	39	79.6%	83.3%	85.3%	88.1%	15	30.6%	23.1%	25.8%	20.5%
Upper	9	18.4%	15.7%	10.7%	9.5%	12	24.5%	39.2%	32.1%	54.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.1%	5.8%	1.5%	2.1%
Total	49	100.0%	100.0%	100.0%	100.0%	49	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%	85.7%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	14.3%	90.5%	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%	17	6.9%	2.2%	9.0%	3.3%
Moderate	4	1.6%	0.9%	4.4%	2.9%	54	21.8%	13.5%	21.1%	12.3%
Middle	186	75.0%	73.9%	79.1%	70.9%	68	27.4%	21.3%	24.8%	19.1%
Upper	58	23.4%	25.2%	16.5%	26.2%	103	41.5%	56.7%	37.1%	48.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	2.4%	6.3%	8.0%	16.5%
Total	248	100.0%	100.0%	100.0%	100.0%	248	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%	5.3%				6.1%
Middle	7	70.0%	34.7%		78.5%	80.5%				
Upper	3	30.0%	65.3%		14.4%	13.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		1.8%	0.4%				
Total	10	100.0%	100.0%		100.0%	100.0%				
By Revenue										
\$1 Million or Less	7	70.0%	47.1%		52.2%	40.8%				
By Loan Size										
\$100,000 or less	6	60.0%	18.5%		91.8%	37.9%				
\$100,001-\$250,000	2	20.0%	22.5%		4.5%	18.3%				
\$250,001-\$1 Million	2	20.0%	59.0%		3.6%	43.7%				
Total	10	100.0%	100.0%		100.0%	100.0%				

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area: Non-Metropolitan Area - 2015

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	2	16.7%	45	35.1%
Moderate	0	0.0%	0	0.0%	6	50.0%	26	20.6%
Low/Moderate Total	0	0.0%	0	0.0%	8	66.7%	71	55.7%
Middle	9	75.0%	88	68.6%	1	8.3%	8	6.0%
Upper	3	25.0%	40	31.4%	2	16.7%	42	32.6%
Unknown	0	0.0%	0	0.0%	1	8.3%	7	5.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	128	100.0%	12	100.0%	128	100.0%

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	Home Purchase									
Low	5	2.9%	1.1%	1.6%	0.6%	18	10.5%	6.0%	9.7%	4.8%
Moderate	48	28.1%	17.0%	25.0%	15.3%	39	22.8%	17.0%	24.3%	17.8%
Middle	57	33.3%	32.5%	34.1%	31.9%	50	29.2%	27.2%	25.4%	22.4%
Upper	61	35.7%	49.4%	39.3%	52.2%	63	36.8%	49.2%	30.4%	44.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	0.6%	10.2%	10.0%
<i>Total</i>	<i>171</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>171</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Refinance									
Low	2	2.5%	0.8%	1.5%	0.6%	9	11.4%	5.0%	9.4%	6.0%
Moderate	22	27.8%	16.2%	17.9%	11.4%	17	21.5%	16.3%	18.4%	14.2%
Middle	28	35.4%	33.7%	43.4%	42.5%	23	29.1%	28.9%	25.6%	21.5%
Upper	27	34.2%	49.4%	37.2%	45.5%	29	36.7%	48.3%	38.3%	47.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.3%	1.6%	8.3%	11.3%
<i>Total</i>	<i>79</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>79</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Home Improvement									
Low	4	3.5%	0.8%	3.9%	2.6%	14	12.3%	3.8%	14.3%	6.4%
Moderate	35	30.7%	28.1%	21.5%	17.3%	30	26.3%	26.8%	25.4%	18.0%
Middle	48	42.1%	41.7%	41.3%	40.0%	30	26.3%	23.8%	27.3%	25.2%
Upper	27	23.7%	29.4%	33.3%	40.2%	37	32.5%	43.8%	29.8%	46.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	2.6%	1.8%	3.2%	4.0%
<i>Total</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	Multi-Family									
Low	1	50.0%	9.7%	50.0%	5.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	16.7%	11.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	50.0%	90.3%	16.7%	6.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	16.7%	77.0%	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%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	HMDA Totals									
Low	12	3.3%	1.1%	2.4%	0.9%	41	11.2%	5.5%	10.9%	5.1%
Moderate	105	28.7%	17.7%	22.0%	14.3%	86	23.5%	17.5%	22.9%	16.3%
Middle	134	36.6%	34.2%	38.7%	34.8%	103	28.1%	27.0%	25.9%	21.8%
Upper	115	31.4%	47.0%	36.9%	49.9%	129	35.2%	47.9%	32.3%	44.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	1.9%	2.0%	7.9%	12.4%
<i>Total</i>	<i>366</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>366</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>
	SMALL BUSINESS									
	By Tract Income					By Revenue				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	2	8.0%	0.5%	15.1%	21.1%					
Moderate	7	28.0%	50.5%	24.9%	31.7%					
Middle	10	40.0%	36.0%	28.1%	20.0%					
Upper	6	24.0%	13.0%	30.5%	26.8%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.4%	0.5%					
<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					
	By Loan Size					By Revenue				
\$1 Million or Less	19	76.0%	60.8%	32.7%	26.2%					
\$100,000 or less	18	72.0%	26.9%	89.4%	25.9%					
\$100,001-\$250,000	5	20.0%	38.6%	4.4%	15.3%					
\$250,001-\$1 Million	2	8.0%	34.4%	6.2%	58.8%					
<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>					

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 21300 - 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	7	33.3%	54	31.5%
Moderate	6	28.6%	32	18.3%	3	14.3%	18	10.4%
Low/Moderate Total	6	28.6%	32	18.3%	10	47.6%	72	41.9%
Middle	9	42.9%	68	39.5%	10	47.6%	90	52.3%
Upper	6	28.6%	73	42.2%	1	4.8%	10	5.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	172	100.0%	21	100.0%	172	100.0%

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: 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%	11	10.6%	6.0%	6.9%	3.5%
Moderate	13	12.5%	11.3%	11.6%	8.8%	21	20.2%	16.3%	23.5%	17.0%
Middle	74	71.2%	68.2%	63.8%	57.9%	33	31.7%	29.9%	26.4%	24.0%
Upper	16	15.4%	19.4%	24.3%	33.0%	36	34.6%	45.1%	37.8%	50.7%
Unknown	1	1.0%	1.1%	0.1%	0.1%	3	2.9%	2.7%	5.4%	4.8%
Total	104	100.0%	100.0%	100.0%	100.0%	104	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.3%	0.2%	5	22.7%	11.9%	12.3%	6.7%
Moderate	6	27.3%	17.9%	15.3%	10.0%	6	27.3%	21.1%	21.5%	13.5%
Middle	11	50.0%	42.3%	63.8%	58.6%	2	9.1%	14.0%	25.2%	19.5%
Upper	5	22.7%	39.9%	20.6%	31.2%	9	40.9%	53.0%	30.4%	33.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	10.7%	26.5%
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%	0.0%	0.0%	8	18.2%	17.2%	16.9%	7.7%
Moderate	10	22.7%	21.6%	17.3%	12.3%	4	9.1%	4.8%	21.1%	14.2%
Middle	32	72.7%	76.5%	68.1%	57.2%	16	36.4%	32.9%	28.1%	21.3%
Upper	2	4.5%	1.9%	14.7%	30.5%	16	36.4%	45.1%	31.3%	47.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.6%	9.2%
Total	44	100.0%	100.0%	100.0%	100.0%	44	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%	7.8%	23.3%	1.6%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	25.0%	7.3%	40.0%	2.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	50.0%	84.9%	36.7%	96.1%	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	0	0.0%	0.0%	0.1%	0.1%	24	13.8%	6.7%	10.0%	2.5%
Moderate	30	17.2%	12.4%	13.8%	5.8%	31	17.8%	13.2%	22.1%	8.8%
Middle	118	67.8%	56.1%	64.2%	32.8%	51	29.3%	23.5%	26.0%	12.5%
Upper	25	14.4%	30.8%	21.8%	61.3%	61	35.1%	38.8%	34.2%	25.4%
Unknown	1	0.6%	0.7%	0.1%	0.0%	7	4.0%	17.8%	7.8%	50.8%
Total	174	100.0%	100.0%	100.0%	100.0%	174	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	0	0.0%	0.0%		23.5%	22.1%				
Middle	1	100.0%	100.0%		47.1%	45.9%				
Upper	0	0.0%	0.0%		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	1	100.0%	100.0%		100.0%	100.0%				
By Revenue										
\$1 Million or Less	1	100.0%	100.0%		43.9%	41.8%				
By Loan Size										
\$100,000 or less	0	0.0%	0.0%		89.6%	25.4%				
\$100,001-\$250,000	1	100.0%	100.0%		4.7%	17.1%				
\$250,001-\$1 Million	0	0.0%	0.0%		5.7%	57.5%				
Total	1	100.0%	100.0%		100.0%	100.0%				

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 27060 - 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	2	33.3%	24	18.7%
Moderate	0	0.0%	0	0.0%	1	16.7%	13	10.2%
Low/Moderate Total	0	0.0%	0	0.0%	3	50.0%	37	28.9%
Middle	5	83.3%	117	91.4%	0	0.0%	0	0.0%
Upper	1	16.7%	11	8.6%	3	50.0%	91	71.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	128	100.0%	6	100.0%	128	100.0%

2014 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: Non-Metropolitan Area

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	4.4%	2.2%	5.2%	2.6%
Moderate	15	9.4%	6.2%	5.9%	3.5%	37	23.3%	15.3%	18.8%	12.0%
Middle	116	73.0%	69.0%	78.1%	75.8%	38	23.9%	22.2%	22.1%	18.7%
Upper	28	17.6%	24.8%	16.1%	20.6%	76	47.8%	59.9%	42.9%	57.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	0.4%	11.0%	9.0%
Total	159	100.0%	100.0%	100.0%	100.0%	159	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%	3.9%
Moderate	2	5.9%	5.2%	4.1%	2.4%	9	26.5%	18.0%	18.4%	12.6%
Middle	26	76.5%	68.6%	80.6%	78.0%	5	14.7%	10.4%	27.2%	22.0%
Upper	6	17.6%	26.2%	15.3%	19.6%	19	55.9%	69.2%	40.6%	51.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.9%	2.4%	7.0%	10.2%
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%	4	9.8%	3.1%	13.8%	6.7%
Moderate	0	0.0%	0.0%	3.3%	1.6%	9	22.0%	23.4%	24.9%	16.6%
Middle	35	85.4%	89.3%	82.0%	83.7%	13	31.7%	27.1%	25.4%	21.5%
Upper	6	14.6%	10.7%	14.8%	14.7%	13	31.7%	36.7%	34.1%	52.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	4.9%	9.7%	1.8%	2.8%
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%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	100.0%	100.0%	80.0%	99.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	20.0%	0.1%	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%	11	4.7%	1.5%	8.3%	3.3%
Moderate	17	7.2%	4.4%	4.6%	2.9%	55	23.3%	12.1%	20.5%	12.1%
Middle	179	75.8%	77.3%	80.0%	78.0%	56	23.7%	15.7%	24.5%	19.3%
Upper	40	16.9%	18.3%	15.4%	19.1%	108	45.8%	45.3%	39.5%	53.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	2.5%	25.4%	7.2%	12.0%
Total	236	100.0%	100.0%	100.0%	100.0%	236	100.0%	100.0%	100.0%	100.0%
	SMALL BUSINESS									
	By Tract Income					By Borrower Income				
	#	Bank		Aggregate		#	Bank		Aggregate	
		%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
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%	5.1%	7.1%
Middle	3	60.0%	53.6%	60.0%	53.6%	3	80.1%	77.4%	80.1%	77.4%
Upper	2	40.0%	46.4%	40.0%	46.4%	2	12.5%	14.1%	12.5%	14.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.3%	1.4%
Total	5	100.0%	100.0%	100.0%	100.0%	5	100.0%	100.0%	100.0%	100.0%
	By Revenue					By Loan Size				
\$1 Million or Less	1	20.0%	8.9%	20.0%	8.9%	1	46.8%	47.4%	46.8%	47.4%
\$100,000 or less	3	60.0%	33.0%	60.0%	33.0%	3	91.0%	37.8%	91.0%	37.8%
\$100,001-\$250,000	2	40.0%	67.0%	40.0%	67.0%	2	5.9%	25.2%	5.9%	25.2%
\$250,001-\$1 Million	0	0.0%	0.0%	0.0%	0.0%	0	3.1%	37.0%	3.1%	37.0%
Total	5	100.0%	100.0%	100.0%	100.0%	5	100.0%	100.0%	100.0%	100.0%

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group: Non-Metropolitan Area - 2014

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	2	22.2%	24	28.1%
Moderate	0	0.0%	0	0.0%	2	22.2%	27	31.5%
Low/Moderate Total	0	0.0%	0	0.0%	4	44.4%	51	59.6%
Middle	7	77.8%	76	88.2%	2	22.2%	21	25.0%
Upper	2	22.2%	10	11.8%	2	22.2%	6	7.2%
Unknown	0	0.0%	0	0.0%	1	11.1%	7	8.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	86	100.0%	9	100.0%	86	100.0%

2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: MSA 21300

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Home Purchase										
Low	2	1.0%	0.3%	1.5%	0.5%	20	9.7%	5.1%	6.1%	3.4%
Moderate	43	20.9%	14.0%	21.2%	14.5%	46	22.3%	14.0%	21.7%	14.4%
Middle	81	39.3%	36.1%	38.0%	34.3%	63	30.6%	27.3%	27.6%	25.2%
Upper	80	38.8%	49.7%	39.3%	50.7%	73	35.4%	50.7%	35.8%	48.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	1.9%	2.9%	8.8%	8.3%
Total	206	100.0%	100.0%	100.0%	100.0%	206	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	2	1.1%	0.5%	0.8%	0.2%	12	6.8%	2.9%	5.7%	2.2%
Moderate	38	21.6%	16.0%	17.9%	41.9%	36	20.5%	13.1%	14.5%	6.9%
Middle	78	44.3%	40.2%	40.3%	24.1%	49	27.8%	26.9%	26.2%	14.0%
Upper	58	33.0%	43.3%	41.0%	33.8%	75	42.6%	54.9%	45.8%	37.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	2.3%	2.2%	7.8%	39.5%
Total	176	100.0%	100.0%	100.0%	100.0%	176	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	2	1.6%	1.1%	1.8%	0.7%	9	7.2%	2.8%	8.1%	3.5%
Moderate	42	33.6%	30.8%	24.7%	17.7%	22	17.6%	13.7%	20.1%	13.8%
Middle	47	37.6%	41.2%	40.0%	39.7%	44	35.2%	28.2%	31.7%	24.7%
Upper	34	27.2%	26.9%	33.5%	41.9%	42	33.6%	51.4%	36.5%	54.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	6.4%	3.9%	3.5%	3.6%
Total	125	100.0%	100.0%	100.0%	100.0%	125	100.0%	100.0%	100.0%	100.0%
Multi-Family										
Low	0	0.0%	0.0%	33.3%	0.8%	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	0	0.0%	0.0%	33.3%	67.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	31.7%	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	6	1.2%	0.4%	1.3%	0.4%	41	8.1%	4.1%	6.5%	2.5%
Moderate	123	24.3%	16.4%	20.8%	26.5%	104	20.5%	13.7%	18.5%	9.7%
Middle	206	40.6%	38.0%	39.4%	32.5%	156	30.8%	27.2%	28.1%	17.8%
Upper	172	33.9%	45.2%	38.5%	40.6%	190	37.5%	52.2%	39.7%	39.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	3.2%	2.7%	7.2%	30.1%
Total	507	100.0%	100.0%	100.0%	100.0%	507	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)		%		% \$(000s)			
Low	1	4.2%	0.7%		16.7%		23.5%			
Moderate	11	45.8%	50.4%		24.7%		36.4%			
Middle	2	8.3%	11.9%		29.6%		14.5%			
Upper	10	41.7%	36.9%		27.9%		24.7%			
Unknown	0	0.0%	0.0%		0.0%		0.0%			
Tract Unknown	0	0.0%	0.0%		1.0%		0.9%			
Total	24	100.0%			100.0%					
By Revenue										
\$1 Million or Less	17	70.8%			68.7%		31.9%		25.1%	
By Loan Size										
\$100,000 or less	14	58.3%			22.8%		88.5%		24.7%	
\$100,001-\$250,000	7	29.2%			43.2%		6.0%		20.7%	
\$250,001-\$1 Million	3	12.5%			34.0%		5.4%		54.7%	
Total	24	100.0%			100.0%					

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 21300 - 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	3	18.8%	19	12.0%
Moderate	4	25.00%	39	25.0%	5	31.3%	60	38.7%
Low/Moderate Total	4	25.0%	39	25.0%	8	50.0%	79	50.7%
Middle	4	25.0%	41	26.1%	2	12.5%	22	13.9%
Upper	8	50.0%	76	48.8%	5	31.3%	45	29.3%
Unknown	0	0.0%	0	0.0%	1	6.3%	10	6.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	155	100.0%	16	100.0%	155	100.0%

2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: 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%	0.3%	0.5%	15	11.1%	7.8%	11.0%	5.8%
Moderate	17	12.6%	11.3%	10.1%	8.2%	45	33.3%	28.8%	27.5%	20.0%
Middle	81	60.0%	62.2%	61.5%	58.0%	38	28.1%	29.0%	22.6%	20.4%
Upper	37	27.4%	26.5%	28.1%	33.3%	37	27.4%	34.4%	34.0%	45.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.8%	8.8%
Total	135	100.0%	100.0%	100.0%	100.0%	135	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.3%	0.6%	6	11.3%	10.2%	9.6%	5.5%
Moderate	6	11.3%	11.7%	13.3%	10.7%	12	22.6%	17.8%	22.8%	18.2%
Middle	41	77.4%	72.2%	65.2%	62.0%	16	30.2%	29.5%	27.6%	25.8%
Upper	6	11.3%	16.1%	21.2%	26.7%	18	34.0%	41.8%	34.7%	44.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	1.9%	0.8%	5.3%	5.8%
Total	53	100.0%	100.0%	100.0%	100.0%	53	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.5%	1.4%	2	6.7%	7.5%	17.1%	6.3%
Moderate	6	20.0%	14.6%	18.2%	12.2%	6	20.0%	10.5%	28.3%	19.4%
Middle	20	66.7%	75.2%	63.6%	55.1%	11	36.7%	28.9%	22.2%	23.9%
Upper	4	13.3%	10.2%	17.6%	31.3%	11	36.7%	53.0%	29.7%	44.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.7%	5.7%
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	1	33.3%	14.4%	22.2%	10.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	2	66.7%	85.6%	44.4%	20.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	68.6%	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%	0.3%	0.6%	23	10.4%	8.2%	11.5%	5.2%
Moderate	30	13.6%	11.6%	12.9%	9.5%	63	28.5%	24.5%	25.6%	17.5%
Middle	144	65.2%	65.9%	63.0%	55.7%	65	29.4%	28.5%	24.0%	20.6%
Upper	47	21.3%	22.5%	23.8%	34.2%	66	29.9%	36.1%	33.0%	40.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	1.8%	2.7%	5.8%	15.9%
Total	221	100.0%	100.0%	100.0%	100.0%	221	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)	%	% \$(000s)	%	% \$(000s)			
Low	0	0.0%	0.0%	0.0%	0.0%	0.8%	0.3%			
Moderate	0	0.0%	0.0%	0.0%	0.0%	23.6%	23.3%			
Middle	1	100.0%	100.0%	100.0%	100.0%	41.7%	39.9%			
Upper	0	0.0%	0.0%	0.0%	0.0%	27.8%	36.0%			
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	6.1%	0.5%			
Total	1	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%			
By Revenue										
\$1 Million or Less	1	100.0%	100.0%	100.0%	100.0%	42.1%	38.2%			
By Loan Size										
\$100,000 or less	0	0.0%	0.0%	0.0%	0.0%	90.4%	29.6%			
\$100,001-\$250,000	0	0.0%	0.0%	0.0%	0.0%	4.5%	16.5%			
\$250,001-\$1 Million	1	100.0%	100.0%	100.0%	100.0%	5.1%	53.9%			
Total	1	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%			

Originations and Purchases

Consumer Loan Distribution Table

Assessment Area/Group : MSA 27060 - 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	1	20.0%	3	4.2%
Moderate	3	60.0%	47	62.9%	2	40.0%	21	27.9%
Low/Moderate Total	3	60.0%	47	62.9%	3	60.0%	24	32.1%
Middle	2	40.0%	28	37.1%	1	20.0%	10	14.0%
Upper	0	0.0%	0	0.0%	1	20.0%	40	53.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	74	100.0%	5	100.0%	74	100.0%

2013 Aggregate Comparison Loan Distribution Table
Assessment Area/Group: Non-Metropolitan Area

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%	8	4.5%	2.3%	4.2%	2.1%
Moderate	6	3.4%	3.5%	4.6%	3.1%	49	27.4%	22.0%	22.4%	15.5%
Middle	126	70.4%	69.3%	74.7%	71.2%	50	27.9%	27.1%	23.9%	20.4%
Upper	47	26.3%	27.2%	20.7%	25.7%	72	40.2%	48.6%	40.9%	55.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	8.6%	6.9%
Total	179	100.0%	100.0%	100.0%	100.0%	179	100.0%	100.0%	100.0%	100.0%
Refinance										
Low	0	0.0%	0.0%	0.0%	0.0%	2	3.1%	1.3%	5.0%	2.6%
Moderate	1	1.5%	1.4%	2.4%	1.5%	10	15.4%	11.7%	15.9%	10.0%
Middle	52	80.0%	82.1%	75.5%	72.8%	14	21.5%	19.0%	24.5%	20.2%
Upper	12	18.5%	16.5%	22.0%	25.7%	39	60.0%	68.0%	47.9%	59.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	6.7%	7.9%
Total	65	100.0%	100.0%	100.0%	100.0%	65	100.0%	100.0%	100.0%	100.0%
Home Improvement										
Low	0	0.0%	0.0%	0.0%	0.0%	4	10.8%	1.6%	12.1%	4.2%
Moderate	1	2.7%	4.4%	1.4%	1.8%	5	13.5%	5.8%	24.3%	14.4%
Middle	26	70.3%	76.0%	83.6%	84.7%	13	35.1%	28.4%	27.5%	23.5%
Upper	10	27.0%	19.7%	15.0%	13.5%	14	37.8%	63.0%	33.9%	54.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	2.7%	1.2%	2.1%	3.8%
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%	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%	22.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	25.0%	77.4%	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	0	0.0%	0.0%	0.0%	0.0%	14	5.0%	2.0%	6.3%	2.4%
Moderate	8	2.8%	3.0%	3.0%	2.2%	64	22.8%	18.6%	20.3%	12.6%
Middle	204	72.6%	72.8%	77.0%	70.9%	77	27.4%	25.2%	24.9%	19.7%
Upper	69	24.6%	24.2%	19.9%	26.9%	125	44.5%	54.0%	41.9%	54.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.4%	0.1%	6.5%	10.9%
Total	281	100.0%	100.0%	100.0%	100.0%	281	100.0%	100.0%	100.0%	100.0%
SMALL BUSINESS										
By Tract Income										
	#	Bank			Aggregate					
		%	% \$(000s)		% \$(000s)		%	% \$(000s)		
Low	0	0.0%	0.0%		0.0%		0.0%	0.0%		
Moderate	1	11.1%	3.5%		4.6%		4.6%	4.1%		
Middle	7	77.8%	94.7%		80.4%		80.4%	78.1%		
Upper	1	11.1%	1.8%		12.1%		12.1%	16.0%		
Unknown	0	0.0%	0.0%		0.0%		0.0%	0.0%		
Tract Unknown	0	0.0%	0.0%		2.9%		2.9%	1.8%		
Total	9	100.0%	100.0%		100.0%		100.0%	100.0%		
By Revenue										
\$1 Million or Less	6	66.7%	51.8%		49.0%		49.0%	43.6%		
By Loan Size										
\$100,000 or less	6	66.7%	28.6%		91.4%		91.4%	35.3%		
\$100,001-\$250,000	3	33.3%	71.4%		4.8%		4.8%	18.6%		
\$250,001-\$1 Million	0	0.0%	0.0%		3.8%		3.8%	46.1%		
Total	9	100.0%	100.0%		100.0%		100.0%	100.0%		

Originations and Purchases

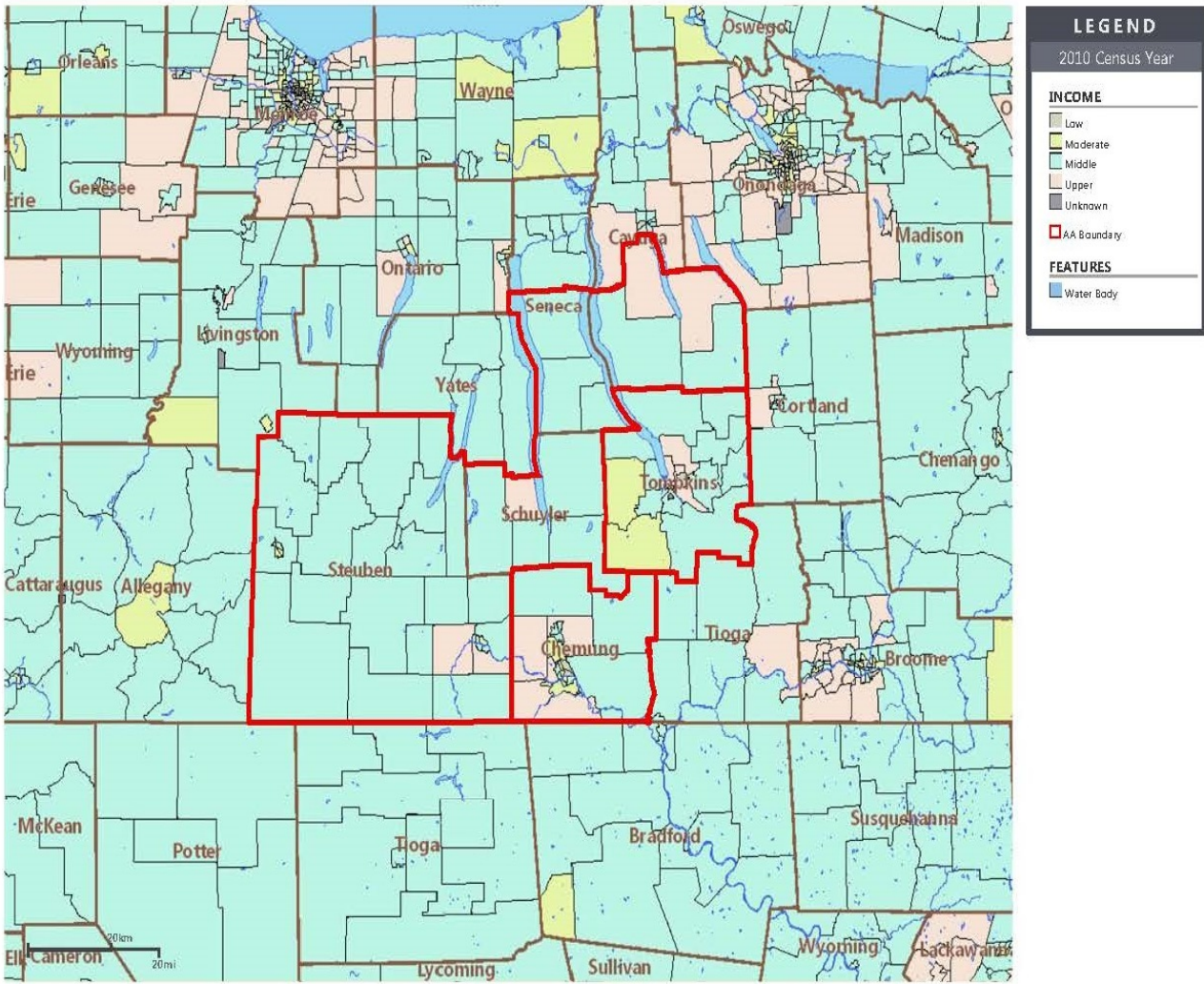
Consumer Loan Distribution Table

Assessment Area/Group: Non-Metropolitan Area - 2013

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Consumer Loans							
Low	0	0.0%	0	0.0%	3	33.3%	20	9.1%
Moderate	1	11.1%	76	34.5%	2	22.2%	33	14.9%
Low/Moderate Total	1	11.1%	76	34.5%	5	55.6%	53	24.0%
Middle	6	66.7%	74	33.5%	3	33.3%	135	60.9%
Upper	2	22.2%	71	32.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	11.1%	33	15.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	221	100.0%	9	100.0%	221	100.0%

CRA APPENDIX B

ELMIRA SAVINGS BANK ASSESSMENT AREA



CRA APPENDIX C

GLOSSARY

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All agencies have adopted the following language. 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 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 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).

Community Development Financial Institution ("CDFI"): A CDFI is an organization that has been certified by the U.S. Treasury as a provider of loans and services that assist specially funded institutions that revitalize LMI areas and assist LMI persons.

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

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

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 refinancing of home improvement and home purchase loans.

Household: A household consists of all persons who occupy a housing unit. Persons not living in households are classified as living in group quarters.

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

Metropolitan Area (“MA”): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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.

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

industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR

as nonmortgage, commercial loans.

Upper-income: Individual income that is more than 120% of the area median income, or a median family income that is more than 120%, in the case of geography.