



PUBLIC DISCLOSURE

November 13, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Groton
Charter Number 1083

161 Main Street
Groton, NY 13073-0038

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, NY 13057

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

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Overall CRA Rating

INSTITUTION'S CRA RATING: This institution is rated Outstanding.

The Lending Test is rated: Outstanding.

The primary factors supporting the CRA rating are as follows:

- The bank had a more than reasonable average loan-to-deposit ratio during the evaluation period.
- A majority of consumer, small business, and home mortgage loans originated or purchased during the evaluation period were inside the bank's assessment areas (AA).
- The bank had excellent penetration of small business, home mortgage, and consumer loans to businesses of different sizes and borrowers of different incomes within the AAs.
- The bank's AAs do not include any low- or moderate-income census tracts (CT).

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

The First National Bank of Groton (FNBG) is a \$175.9 million community bank headquartered in Groton, New York (NY). FNBG has one branch in Moravia, NY. The Town of Groton is located in the northeast corner of Tompkins County and is part of the Ithaca Metropolitan Statistical Area (MSA). Moravia is located in the southern section of Cayuga County and is not part of an MSA. Management has not opened or closed a branch since the last evaluation. The institution offers banking services six days a week for all services at the main office and the branch. Lobby hours are from 9:00 am to 4:00 pm on Monday and Tuesday, 9:00 am to 1:00 pm on Wednesday, 9:00 am to 5:00 pm on Thursday and Friday, and 9:00 am to 12:00 pm on Saturday. Drive-thru banking at both locations extends transactional banking hours from 8:00 am to 5:00 pm on Monday to Wednesday, 8:00 am to 6:00 pm on Thursday, 8:00 am to 7:00 pm on Friday, and 8:00 am to 12:00 pm on Saturday. Each office has a 24-hour automated teller machine (ATM). For customers who want the option of electronic banking, the bank offers online banking with a bill payment feature. The bank also offers mobile banking with remote deposit capture via use of a cell phone camera and telephone banking.

As of September 30, 2017, FNBG's balance sheet included \$91.7 million in total loans consisting of: 59.1 percent residential real estate mortgage loans, 17.8 percent consumer loans, 13.4 percent commercial loans, 7.5 percent commercial real estate loans, and 2.2 percent agricultural loans. Management does not sell residential real estate mortgage loans in the secondary market. A substantial portion of deposits are sourced from the bank's market area.

The bank's borrowers tend to be low- or moderate-income persons, as well as, micro to small businesses. To address borrowing demand, the bank offers noncomplex residential mortgage loans, including direct mobile home financing. Consumer and business loans are not complex; however, FNBG is somewhat unique in its approach to one area of lending. Aside from offering typical commercial and retail installment loans, management frequently extends short-term time/demand notes. These time/demand notes can be and are often renewed multiple times in one year and occasionally beyond, but each time only after discussions, review, and contact between the lender and borrower. This is a somewhat costly approach, but it meets a credit need and allows the bank to more closely monitor the borrower's continuing repayment capacity. Rates on these often low-dollar time/demand notes are below typical credit card or checking line of credit advances, which, in some cases, might be the only other option for many of FNBG's customers. Management does advance notes in dollar amounts below \$1,000.

Management participates in the Tompkins County First Time Home Buyer Program, as well as, various community development programs where loans are offered at lower rates, if the advances will improve economic conditions in, or the appearance of, the villages of Locke, Groton, and/or Moravia. The bank is also an approved Small Business Administration (SBA) lender.

Based on our review of loan originations from January 1, 2015 to June 30, 2017, we reviewed performance of the three major loan categories: commercial, consumer, and residential mortgage loans. In a straight count of originations, consumer loans accounted for the most loans; however, commercial loan advances far exceeded consumer loan dollars originated. We gave equal weight to consumer and commercial loans in reaching our conclusions. Management maintains that residential mortgage loans are a primary product. While residential mortgage loans did not account for the largest number or dollars of loans originated, they do represent a very large portion of the bank's loan portfolio. Another consideration in the determination of the bank's primary product is the higher level of time/demand note renewals that somewhat inflates the volume of consumer and commercial loans. These factors justified our inclusion of residential mortgage loans in this evaluation.

Deposit accounts offered by the bank include various savings accounts and checking accounts. The bank offers free low-balance accounts and free senior checking accounts. As of June 30, 2017, the FDIC reports that FNBG ranked eighth (4.4 percent market share) for deposits held amongst insured financial institutions having branches in Cayuga County. The bank ranked third (5.1 percent market share) for deposits in Tompkins County. Tompkins Trust Company dominates the deposit market with a 62.3 percent share of deposits held.

FNBG has no legal, financial or other impediments hindering its ability to help meet the credit needs in its AAs. FNBG was rated "Outstanding" at its last CRA evaluation dated February 22, 2010.

Description of Assessment Areas

Ithaca MSA AA

The Ithaca MSA AA consists of three middle-income CTs in Tompkins County. The AA does not arbitrarily exclude low- or moderate-income CTs. As of 2017, the AA has 14,796 persons and includes 6,560 total housing units. Approximately 92.3 percent of the housing units are occupied, with 68.6 percent of the total housing units owner-occupied units and 23.6 percent rental occupied units. Approximately 7.7 percent are vacant. The weighted average median housing value is \$140,289. The AA includes 6,052 households, of which 587, or 9.70 percent, are living below the poverty level. The AA has 3,868 total families and a Median Family Income (MFI) of \$75,600. As of 2016, there were 609 non-farm businesses, 86.0 percent of which reported revenues below \$1 million, and 88 farms, of which 94.3 percent reported revenues below \$1 million.

Economic conditions in the AA are stable. The unemployment rate in Tompkins County was 4.3 percent, as of September 30, 2017, lower than the New York State unemployment rate of 4.8 percent.

Industries providing the most employment are: education, manufacturing, and county government. In Tompkins County, major employers include: Cornell University,

BorgWarner Automotive, Ithaca City School District, Ithaca College, and Tompkins County, NY.

Demographic Information of the AA: Ithaca MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	14,769	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,560	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,503	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,549	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	508	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,868	15.9	24.2	22.1	37.8	0.0
Updated MFI Ithaca MSA AA		\$75,600	Median Housing Value			\$140,289
			Median Gross Rent			\$801
			Households Below the Poverty Level			9.70%
<i>Source: 2010 U.S. Census, 2015 ACS US Census, 2016 D&B Data and updated 2017 Median Family Income</i> (*) The NA category consists of geographies that have not been assigned an income classification.						

We did not make a community contact in the AA.

Non MSA AA

The Non MSA AA consists of two middle-income CTs in Cayuga County and one upper-income CT in Cortland County. The AA does not arbitrarily exclude low- or moderate-income CTs. In 2017, Cayuga County CT 408 declined from an upper-income CT to a middle-income CT. As of 2017, the AA has 14,336 persons and 6,231 total housing units. Approximately 84.2 percent of the housing units are occupied, with 66.5 percent of the total housing units owner-occupied units and 17.8 percent rental occupied units. Approximately 15.8 percent of the AA’s housing units are vacant. The weighted average median housing value is \$125,639. The AA includes 5,247 households, of which 495, or 9.4 percent, are living below the poverty level. The AA has 3,544 total families and a MFI of \$62,500. As of 2016, there were 715 non-farm businesses, 77.2 percent of which reported revenues below \$1 million, and 66 farms, of which 100 percent reported revenues below \$1 million.

Economic conditions in the AA are stable. The unemployment rates for Cayuga and Cortland Counties, as of September 30, 2017, were 4.5 percent and 4.8 percent, respectively, in line with the overall 4.8 percent rate for New York State.

In Cayuga County, major employers include: Auburn Community Hospital, New York State Department of Corrections (prisons in Auburn and Moravia), and the Auburn School District. Private employers include Walmart, Wegmans, TRW Automotive, and Xylem. Major employers in Cortland County include: SUNY Cortland, Cortland Regional Medical Center, Cortland City School District, Cortland County Government and Marietta Corporation.

Demographic Information of the AA: Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	14,336	0.0	0.0	60.8	39.2	0.0
Housing Units by Geography	6,231	0.0	0.0	61.9	38.1	0.0
Owner-Occupied Units by Geography	4,141	0.0	0.0	60.3	39.7	0.0
Occupied Rental Units by Geography	1,106	0.0	0.0	49.3	50.7	0.0
Vacant Units by Geography	984	0.0	0.0	82.5	17.5	0.0
Family Distribution by Income Level	3,544	0.0	0.0	59.9	40.1	0.0
Updated MFI Non MSA AA		\$62,500	Median Housing Value			\$125,639
			Median Gross Rent			\$696
			Households Below the Poverty Level			9.43%
<small>Source: 2010 U.S. Census, 2015 ACS US Census, 2016 D&B Data and updated 2017 Median Family Income (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

A contact with a community organization focused on business development in Cayuga County noted the need for working capital lending and occasional barriers to expansion caused by multiple governmental reviews and approval requirements.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation covered the time period from February 22, 2010 to November 13, 2017. Our review of the bank’s performance under the Lending Test was based on loan

originations and purchases of consumer loans, residential mortgage loans, and commercial loans between January 1, 2015 and June 30, 2017. Management strategies have not changed significantly and management agreed that the Lending Test period is representative of the entire evaluation period.

Data Integrity

We tested the quality of the bank's 2015 and 2016 HMDA data and found the data to be reliable.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the Ithaca MSA and the Non MSA. See the Table in Appendix A for more information.

Ratings

The bank's overall rating is based primarily on the AAs that received full-scope reviews. We gave performance in the Ithaca MSA AA the most weight, as the AA accounts for 52 percent of the bank's loans and 68 percent of the bank's deposits. We placed less weight on the Non MSA AA, which originated 48 percent of the bank's loans and 32 percent of the bank's deposits.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

LENDING TEST

Loan-to-Deposit Ratio

FNBG's average loan-to-deposit ratio during the evaluation period was more than reasonable. The bank's average quarterly loan-to-deposit ratio since the last CRA evaluation through September 30, 2017, was 57.73 percent. In comparison, three similarly situated banks, competing directly with FNBG, had average quarterly loan-to-deposit ratios ranging from 36.14 percent to 55.54 percent.

Lending in Assessment Area

A majority of the number of the bank's loans originated or purchased during the evaluation period were within the AAs. The amount of total loans within the AA was 75.5 percent by number of loans and 66.1 percent by dollar amount of loans.

Lending in Ithaca MSA and Non MSA AAs										
Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Consumer	76	67.3	37	32.7	113	550	63.8	312	36.2	862
Residential	444	73.4	161	26.6	594	16,079	69.7	7,000	30.3	22,473
Commercial	69	67.0	34	33.0	103	1,900	46.0	2,229	54.0	4,129
Totals	513	72.5	195	27.5	708	17,979	66.1	9,229	33.9	27,464

Source: Consumer and commercial loan sample from 1/1/2015 to 6/30/2017 and HMDA data from 1/1/2015 to 6/30/2017.

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

FNBG's distribution of loans to borrowers of different incomes and businesses of different sizes reflected excellent penetration in the two AAs.

FNBG's distribution of small business loans to small size businesses (businesses with annual revenues less than or equal to \$1,000,000) was good. The bank's distribution of small business loans to small size businesses was near to the portion of small size businesses located in the Ithaca AA, and exceeded the portion of small size businesses located in the Non MSA AA.

Ithaca MSA AA – Borrower Distribution of Loans to Businesses/Farms				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	86.0%	4.8%	9.2%	100%
% of Bank Loans in AA by #	80.5%	9.7%	9.8%	100%
% of Bank Loans in AA by \$	80.9%	8.0%	11.1%	100%

Source: Loan sample; Dun and Bradstreet data.

Non MSA AA – Borrower Distribution of Loans to Businesses/Farms				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	77.2%	5.7%	17.1%	100%
% of Bank Loans in AA by #	85.7%	7.1%	7.2%	100%
% of Bank Loans in AA by \$	56.9%	42.1%	1.0%	100%

Source: Loan sample; Dun and Bradstreet data.

FNBG’s distribution of consumer loans to both low- and moderate-income persons was excellent. The percentage of loans made low- and moderate-income borrowers exceeded the percentage of low- and moderate-income households in each AA.

Ithaca MSA AA – Borrower Distribution of Consumer Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
01/01/15-06/30/17 Consumer Loans	18.3%	33.3%	13.7%	30.0%	20.6%	16.7%	47.3%	14.3%

Source: Loan sample; 2000 U.S. Census data and 2015 ACS U.S. Census data.

Non MSA AA – Borrower Distribution of Consumer Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
01/01/15-06/30/17 Consumer Loans	18.4%	25.5%	13.3%	44.7%	16.5%	12.8%	51.8%	17.0%

Source: Loan sample; 2000 U.S. Census data and 2015 ACS U.S. Census data.

FNBG’s distribution of residential mortgage loans to both low- and moderate-income persons was excellent. The percentage of loans made to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families in each AA.

Non MSA AA – Borrower Distribution of Residential Mortgage Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
2015-2016	14.4%	14.9%	19.0%	28.6%	20.8%	26.9%	45.8%	29.7%
2017	17.2%	18.5%	11.3%	27.7%	21.0%	27.7%	50.5%	24.6%

Source: 2015 to June 30, 2017 Bank HMDA LAR data, 2010 US Census Data and 2015 ACS U.S Census data. In 2015 and 2016 0.6% of loans did not have a reported income. In 2017, 4.1% of the loans did not have reported income on the HMDA LAR.

Ithaca MSA AA – Borrower Distribution of Residential Real Estate Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
2015-2016	18.8%	28.7%	20.8%	38.5%	22.6%	23.8%	37.8%	8.4%
2017	15.9%	24.5%	24.2%	44.9%	22.1%	20.4%	37.8%	6.1%

Source: 2015 to June 30, 2017 Bank HMDA LAR data, 2010 US Census Data and 2015 ACS U.S Census data. In 2017, 1.5% of the loans did not have reported income on the HMDA LAR.

Geographic Distribution of Loans

The bank’s AAs do not contain any low- or moderate- income CTs, thus having no impact on this evaluation.

Responses to Complaints

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

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test: 01/01/15 to 06/30/17	
Financial Institution		Products Reviewed
First National Bank of Groton (FNBG) Groton, New York		Consumer Loans, Commercial Loans and Residential Mortgage Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Ithaca MSA Non MSA	Full-Scope Full-Scope	