



PUBLIC DISCLOSURE

April 01, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Generations Bank
Charter Number 718024

19 Cayuga Street
Seneca Falls, NY 13148

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.

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

The Lending Test is rated: Satisfactory.

- Generations Bank (Generations) had a more than reasonable average loan-to-deposit ratio during the evaluation period.
- A majority of home mortgage loans originated during the review period were in the bank's combined assessment area (AA).
- The bank met the standard for satisfactory performance for the distribution of home mortgage loans to borrowers of different income levels within its AAs.
- The bank met the standard for satisfactory performance for the geographic distribution of home mortgage loans within its AAs.

SCOPE OF EXAMINATION

The evaluation period covers the time period from June 25, 2007, through April 1, 2013. The loans included in the review were originated during the time period of January 1, 2010, through December 31, 2011. This time period was representative of the entire evaluation period, as no strategic changes or changes in lending standards took place. We discussed the review period with management and management concurred with this determination.

While management has been diversifying the loan portfolio over the last few years, we determined that residential mortgage loans, based on dollar volume and number, remain the bank's primary product. For purposes of this evaluation, residential mortgage loans are loans originated for the purpose of home purchase, home refinance, and home improvement reported pursuant to the Home Mortgage Disclosure Act (HMDA). Our review evaluated the bank's distribution of loans originated during the evaluation period by income designation of census tracts and to borrowers of different income levels. We also evaluated the amount of loans originated in the bank's AAs and the bank's average loan-to-deposit ratio. As part of the examination, we also validated the accuracy of the HMDA Loan Application Register (LAR).

We analyzed the Metropolitan Statistical Area (MSA) AA and the non-MSA AA separately, which are the Seneca/Cayuga AA (non-MSA) and the Ontario AA (MSA). The Ontario AA is part of the Rochester MSA. Our analysis was more heavily weighted on performance in the Seneca/Cayuga AA, as it is the dominant AA with respect to both number of census tracts and level of lending. Additionally, our assessment primarily relied on the results of home purchase and refinance lending, with the most emphasis on home purchase lending as home purchase loans exceeded the number of refinance loans during the review period. Performance with respect to home improvement loans received minimal consideration, as management does not emphasize secured home improvement loan financing. Most home improvement purpose lending is in the form of

home equity lines of credit (HELOCs), which the bank opts to not report on the HMDA-LAR. Lastly, we did not weight the Geographic Distribution of Loans as heavily as the other components of the lending test as it was not as meaningful due to the low number of low- and moderate-income census tracts in the AAs.

DESCRIPTION OF INSTITUTION

Generations Bank, formerly known as Seneca Falls Savings and Loan, is a federally chartered thrift institution headquartered in Seneca County, in the Hamlet of Seneca Falls, New York (NY). The bank announced its name change in April of 2012. The bank is a wholly owned subsidiary of Seneca-Cayuga Bancorp, Inc., which is a wholly owned subsidiary of Seneca Falls Savings Bank, MHC. The bank presently maintains nine retail branches in Seneca Falls, Geneva, Auburn, Waterloo, Union Springs, and Phelps, NY. Since the last evaluation, the bank added five branches, including: Union Springs and Phelps in 2009; Auburn branches in 2008 and 2011; and, a second Waterloo branch in 2010. The Auburn branches complimented an existing location in the Auburn Wal-Mart. Management intends to open a branch in Farmington, NY, in 2013. The bank also has a Loan Servicing Office in Seneca Falls. All branches have drive-up banking services, with the exception of the Phelps branch and Auburn Wal-Mart locations. All locations are in middle-income census tracts with the exception of the Union Springs location, which is in an upper-income census tract. The bank maintains five off-site ATMs with two in Auburn, and one each in Geneva, Waterloo and Seneca Falls. These ATMs are located in manufacturing facilities, a college and a governmental building.

Generations offers a variety of residential mortgage loan products including: residential construction loans, fixed rate residential mortgages, 5-year adjustable rate mortgages, fixed and variable rate home equity lines of credit (owner and non-owner occupied 1-4 family), and a home equity loan product for owner occupied 1-4 family residences. The bank also approves and then books loans secured by mobile homes from First Credit Corp. Consumer loan offerings include: personal secured and unsecured loans, recreational vehicle and boat loans. The bank also originates direct and purchases indirect automobile loans. Generations offers commercial loans of all sizes, although in 2011 management focused on developing loans for small businesses through the Small Business Loan Fund of the US Treasury Department.

On the deposit side, the bank offers free checking accounts and free checking with interest for persons over 50 years of age and/or those who have direct deposit or automatic loan payments. Finally, the bank offers a "green" account where all check transactions and statements are completed or presented using electronic banking. In addition, the bank also offers Health Savings Accounts. On the commercial deposit side, the bank offers business checking accounts targeted to small businesses with reduced fees and no minimum balance requirements. The bank also offers business checking accounts with no fees when a minimum balance is maintained. Additional services offered to meet the needs of its community include: electronic banking, electronic bill payment, mobile banking, debit cards, and Saturday hours at most branches.

As of December 31, 2012, Generations had total assets of \$265.2 million and a total loan portfolio of \$195.6 million. Investments comprise the bulk of the remaining total assets. Since the prior evaluation, assets increased \$116.3 million, or 78.1%, while loan balances increased by approximately \$104 million, or 113%. Table 1 shows the dollar amount, percentage to total loans, and percentage to total assets of each loan category.

Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Residential Mortgage	\$104,221	53.3%	39.3%
Nonresidential Mortgage	25,710	13.1%	9.7%
Commercial Non-mortgage	20,113	10.3%	7.6%
Consumer Non-mortgage	45,531	23.3%	17.2%
Total	\$195,575	100.0%	73.8%

There were no legal, financial, or other factors that would impede the bank’s ability to help meet the credit needs in its AAs. At the last CRA evaluation, dated June 25, 2007, Generations received a rating of “Outstanding” CRA performance from The Office of Thrift Supervision (OTS).

DESCRIPTION OF ASSESSMENT AREAS

The bank has two AAs. The Seneca/Cayuga AA is defined as the whole of both Seneca and Cayuga Counties. The second is a portion of Ontario County, which is part of the Rochester, NY, MSA #40380.

The Seneca/Cayuga AA contains 30 census tracts. The Ontario AA includes 11 census tracts, an increase from five at the last examination. Tables 2 and 2.1 illustrate demographic data on population, families, and housing units within the Seneca/Cayuga and Ontario AAs, respectively.

Demographic Data	2000 Census
Population	115,305
Total Families	29,600
1-4 Family Units	46,837
Multi-family Units	3,434
% Owner-Occupied Units	62.3%
% Rental-Occupied Units	23.6%
% Vacant Housing Units	14.1%
Weighted Average Median Housing	\$72,213

Table 2.1 - Demographic Data Ontario AA (2000 Census data)	
Demographic Data	2000 Census
Population	43,034
Total Families	11,044
1-4 Family Units	16,405
Multi-family Units	1,597
% Owner-Occupied Units	65.0%
% Rental-Occupied Units	25.6%
% Vacant Housing Units	9.5%
Weighted Average Median Housing	\$ 79,085

Tables 3 (Seneca/Cayuga AA) and 3.1 (Ontario AA) indicate the number of census tracts designated in each income level compared to the distribution of families living in those census tracts, and compared to 1-4 family dwellings located within those census tracts.

Table 3 - Distribution of Geographies, Housing Units and Families in the Seneca/Cayuga AA										
Geography		Housing Units			Families		Family Income Distribution Percentages			
Income	Count	Count (000)	Percent to Total	Percent Owner Occupied to Count	Count	Percent to Total	Low	Moderate	Middle	Upper
Low	0	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	1	1.6	1.4%	28.38%	676	2.3%	35.7%	21.8%	23.5%	19.1%
Middle	23	41.3	80.6%	61.19%	24,035	81.2%	16.8%	17.7%	23.6%	41.8%
Upper	5	7.4	14.0%	75.64%	4,889	16.5%	10.4%	12.1%	21.3%	56.2%
N/A	1	0	0.0%	0.0%	0	0.0%				
Totals	30	50.3	100.0%		29,600	100.0%				

Table 3.1 - Distribution of Geographies, Housing Units and Families in the Ontario AA ¹										
Geography		Housing Units			Families		Family Income Distribution Percentages			
Income Level	Count	Count (000)	Percent to Total	Percent Owner Occupied	Count	Percent to Total	Low	Moderate	Middle	Upper
Low	1	1.4	7.8%	29.0%	574	5.2%	54.2%	19.9%	16.0%	9.9%
Moderate	1	0.9	4.7%	40.4%	504	4.6%	42.7%	27.6%	20.2%	9.5%
Middle	9	15.7	87.5%	69.5%	9,966	90.2%	18.9%	22.1%	26.5%	32.5%
Upper	0	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%
N/A	0	0	0.0%	0.0%	0	0.0%				
Totals	11	18.0	100.0%			100.0%				

¹ - All demographic information throughout this report reflects updated U.S. census data resulting from the 2004 MSA boundary changes implemented by the Office of Management and Budget (OMB).

According to 2000 census data, 33.1% of the families in the Seneca/Cayuga AA are designated low- or moderate-income, with 10.68% of the households reporting income below the poverty level. Regarding the Ontario AA, 44.1% of the families are designated low- or moderate-income, with 8.58% of the households reporting income below the poverty level.

The Department of Housing and Urban Development (HUD) annually updates the median family income levels, which are used in the Lending to Borrowers of Different Incomes section of this Performance Evaluation. Table 3(a) and 3.1(a) indicate the median family income ranges of each income category in each AA, based on the 2011 HUD adjustment. Table 3(b) and 3.1(b) reflects the updated HUD median family income from 2007 to 2011 and Table 3(c) and 3.1(c) shows the distribution of families in each income range of the AA.

Table 3(a) - Seneca/Cayuga AA Median Family Income Ranges (*)		
Income Category (As % of MSA Median)	Income Ranges	
	From	To
Low (< 50%)	\$0	\$28,050
Moderate (50% - 79%)	\$28,050	\$44,319
Middle (80% - 119%)	\$44,320	\$67,319
Upper (>= 120%)	\$67,320	+

Table 3(b) - Seneca/ Cayuga AA Annual HUD Median Family Income	
Year	Amount
2007	\$50,900
2008	\$52,700
2009	\$54,900
2010	\$55,300
2011	\$56,100

* Based on HUD 2011 Median Family Income of the MSA

Table 3(c) – Seneca/Cayuga AA Distribution of Families		
Family Income Category (As a % of MSA Median)	2000 Census Data	
	Number	Percent
Low (< 50%)	4,792	16.19%
Moderate (50% - 79%)	4,996	16.88%
Middle (80% - 119%)	6,883	23.25%
Upper (>= 120%)	12,929	43.68%
Total	29,600	100.00%

According to 2012 census estimates, the Seneca/Cayuga AA’s population has decreased by .4% since the 2000 census. In 2011, the largest employers included: Goulds Pumps ITT, Waterloo Premium Outlets, McQuay International (closing 2014), Nucor, and multiple healthcare and nursing home facilities. Since the last evaluation, job opportunities have declined. The unemployment rate in the Seneca/Cayuga AA was in the 3.5% to 5.5% range during 2007. Between 2008 and 2010, the unemployment level increased to between 9.5% and 10.1%, an effect of the economic recession. The present unemployment rate is in the 8% range.

The Seneca/Cayuga AA has no low-income census tracts. The one moderate-income census tract in the AA is located on the western side of the City of Auburn. Owner occupancy in the moderate-income census tract is at 28.38%, with 56.38% renter-occupied and 15.42% vacant. The tract has approximately 3,016 inhabitants and 676 families. The percentage of households below the poverty level is approximately 22%. The median house price in 2000 was \$52,000.

Income Category (As % of MSA Median)	Income Ranges	
	From	To
Low (< 50%)	\$0	\$33,499
Moderate (50% - 79%)	\$33,500	\$53,599
Middle (80% - 119%)	\$53,600	\$80,399
Upper (>= 120%)	\$80,400	+

Year	Amount
2007	\$62,000
2008	\$63,500
2009	\$66,500
2010	\$66,600
2011	\$67,000

* Based on HUD 2011 Median Family Income of the MSA

Family Income Category (As a % of MSA Median)	2000 Census Data	
	Number	Percent
Low (< 50%)	2,414	21.86%
Moderate (50% - 79%)	2,457	22.25%
Middle (80% - 119%)	2,830	25.62%
Upper (>= 120%)	3,343	30.27%
Total	11,044	100.00%

According to 2012 census estimates, the Ontario AA’s population has increased by 7.69% since the 2000 census. In 2011, the largest employers included: Finger Lakes Health, Thompson Health, Pactiv Corp, Wegmans Food Markets, and Clifton Springs Hospital. The unemployment rate in the Ontario AA was increasing in 2007 from 4.8% to 5.4%; however, with the economic downturn between 2008 and 2010, the unemployment level increased to a high of 8.8%. The unemployment rate is presently in the 8% range.

The Ontario AA has one low-income and one moderate-income census tract. The low-income tract’s southern border runs along the north and down a portion of the western shore of Seneca Lake. The southwestern portion of this tract is very close to Hobart and William Smith College making a portion of the census tract attractive for off-campus college housing. Its western boundary runs to Main Street. The northern boundary of the low-income tract abuts the moderate-income tract’s southern border at North Street. The moderate-income tract extends north, east and west to the city’s boundaries, and the western portion of the moderate-income tract encompasses school district lands and a large healthcare facility. Owner occupancy in the low-income tract is at 28.96%, with

55.14% renter-occupied and 15.91% vacant. Owner occupancy in the moderate-income tract is at 40.35%, with 52.24% renter-occupied and 7.41% vacant. The low-income tract has approximately 2,683 inhabitants and 574 families. The percentage of households below the poverty level is about 29%. The median housing price in 2000 was \$50,500. The moderate-income tract has approximately 2,119 inhabitants and 504 families. The percentage of households below the poverty level is about 23%. The median housing price in 2000 was \$46,100.

We contacted a local community development organization that focuses on home ownership for LMI borrowers. The organization is located in Seneca Falls and serves census tracts in Seneca County. Its director provided insight into community credit needs and how financial institutions were meeting those needs. The contact reported that there is ample housing available; however, the condition of many homes (energy efficiency, general repair, lead) requires the buyer to invest funds to keep the cost of home ownership down. She identified three specific banks with good community involvement, including Generations, which she held in the highest regard.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

The institution's average loan-to-deposit ratio during the evaluation period was more than reasonable. Since the last evaluation through September 30, 2012, the bank's quarterly average loan-to-deposit ratio was 95%. Other commercial banks whose lending activity is in this bank's footprint showed much lower loan-to-deposit ratios ranging between 60% and 68%. Regionally, the bank was comparable to two savings banks serving Onondaga County, which abuts the eastern border of Cayuga County. These banks reported loan-to-deposit ratios of 77% and 108%.

Lending in Assessment Area

A majority of home mortgage loans originated during the evaluation period were inside the bank's AAs. Approximately 61% of the number and 68% of the dollar amount of loans originated were in the AAs. The bank continues to approve and book mobile home loans that are outside of its lending area. Refer to Table 4 below.

Table 4 - Concentration of Residential Loans					
1/1/2010 – 12/31/2011					
(Dollars in thousands)					
Period By Year	In Assessment Area		Outside Assessment Area		Total HMDA Loans
By Number:	#	%	#	%	#
2010	127	59.3%	87	40.7%	214
2011	168	62.2%	102	37.8%	270
Total	295	61.0%	189	39.0%	484
By \$ Amount:	\$ Amt	%	\$ Amt	%	\$ Amt
2010	\$13,232	65.7%	\$6,898	34.3%	\$20,130
2011	\$17,334	70.7%	\$7,200	29.3%	\$24,534
Total	\$30,566	68.4%	\$14,098	31.6%	\$44,664

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

Overall, Generations met the standard for satisfactory performance during the evaluation period for the distribution of home mortgage loans to borrowers of different income levels in both the Seneca/Cayuga and Ontario AAs. The tables in this section compare the percentage of bank loans made by borrower income category to the aggregate industry percentage of loans originated by borrower income category in the respective AAs during 2010 and 2011. These tables also compare the percentage of bank loans made by borrower income category to the percentage of families in the AAs having the respective income designation.

Borrower Distribution in the Seneca/Cayuga AA

Table 5.0(a) – Borrower Distribution of Seneca/Cayuga AA Home Purchase Loans							
Borrower Income Level	2010			2011			% of AA Families
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	6	8.7%	8.5%	5	6.9%	9.1%	16.2%
Moderate	21	30.4%	27.8%	20	27.8%	23.8%	16.8%
Middle	24	34.8%	28.2%	20	27.8%	27.7%	23.3%
Upper	18	26.1%	35.6%	27	37.5%	39.4%	43.7%
Total	69	100.0%	100.0%	72	100.0%	100.0%	100.0%

Table 5.0(b) – Borrower Distribution of Seneca/Cayuga AA Home Refinance Loans							
Borrower Income Level	2010			2011			% of AA Families
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	1	3.3%	3.8%	3	4.8%	4.9%	16.2%
Moderate	9	30.0%	16.2%	6	9.5%	13.5%	16.8%
Middle	6	20.0%	26.2%	20	31.8%	31.4%	23.3%
Upper	14	46.7%	46.7%	34	54.0%	50.2%	43.7%
Total	30	100.0%	100.0%	63	100.0%	100.0%	100.0%

Table 5.0(c) – Borrower Distribution of Seneca/Cayuga AA Home Improvement Loans							
Borrower Income Level	2010			2011			% of AA Families
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	3.8%	0	0.0%	4.9%	16.2%
Moderate	0	0.0%	16.2%	0	0.0%	13.5%	16.8%
Middle	0	0.0%	26.2%	1	31.8%	31.4%	23.3%
Upper	0	0.0%	46.7%	4	54.0%	50.2%	43.7%
Total	0	100.0%	100.0%	5	100.0%	100.0%	100.0%

Source: Aggregate HMDA data 2010-2011; 2000 U.S. Census data

The percentage of loans made by the bank to low-income borrowers is in line with the aggregate industry distribution for home purchase and refinance loans in 2010 and 2011, except for home purchase loans in 2011 when the bank’s lending was somewhat below the aggregate industry distribution. Regarding moderate-income borrowers, the percentage of home purchase loans made by the bank was above the aggregate industry distribution in 2010 and 2011. For refinance loans, the bank’s lending to moderate-income borrowers significantly exceeded the aggregate industry distribution in 2010 but was below the aggregate industry distribution in 2011.

Secondary to the aggregate industry lending data, we also considered comparison to demographic data, which also supported the bank’s lending performance. The percentage of loans made by the bank to low-income borrowers is below the percentage of low-income families in the AA for each loan type in 2010 and 2011. However, management’s ability to lend to low-income borrowers is somewhat impacted by the 10.68% of households living below the poverty level, as these households typically do not have an income which would support purchasing or owning a home. The percentage of loans made by the bank to moderate-income borrowers exceeds the percentage of moderate-income families in the AA for both types in 2010 and 2011, except for refinance loans in 2011.

Borrower Distribution in the Ontario AA

Table 5.1(a)– Borrower Distribution of Ontario AA Home Purchase Loans							
Borrower Income Level	2010			2011			% of AA Families
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	17.1%	1	7.7%	17.2%	21.9%
Moderate	6	37.5%	33.1%	6	46.2%	35.3%	22.2%
Middle	6	37.5%	22.2%	6	46.1%	20.8%	25.6%
Upper	4	25.0%	27.6%	0	0.0%	26.7%	30.3%
Total	16	100.0%	100.0%	13	100.0%	100.0%	100.0%

Table 5.1(b) – Borrower Distribution of Ontario AA Home Refinance Loans							
Borrower Income Level	2010			2011			% of AA Families
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	8.6%	0	0.0%	8.8%	21.9%
Moderate	7	63.6%	24.1%	2	15.4%	21.5%	22.2%
Middle	2	18.2%	28.3%	5	38.5%	29.9%	25.6%
Upper	2	18.2%	39%	6	46.1%	39.8%	30.3%
Total	11	100.0%	100.0%	13	100.0%	100.0%	100.0%

Table 5.1(c) – Borrower Distribution of Ontario AA Home Improvement Loans							
Borrower Income Level	2010			2011			% of AA Families
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	15.3%	0	0.0%	17.4%	21.9%
Moderate	0	0.0%	30.7%	0	0.0%	29.3%	22.2%
Middle	1	100.0%	28.1%	2	100.0%	26.7%	25.6%
Upper	0	0.0%	25.9%	0	0.0%	26.6%	30.3%
Total	1	100.0%	100.0%	2	100.0%	100.0%	100.0%

Source: Aggregate HMDA data 2010-2011; 2000 U.S. Census data

The percentage of loans made by the bank to low-income borrowers is well below the aggregate industry distribution for home purchase and refinance loans in 2010 and 2011, with only one loan to a low-income borrower in 2011. However, regarding moderate-income borrowers, the percentage of home purchase loans made by the bank was above the aggregate industry distribution in 2010 and 2011. For refinance loans, the bank’s lending to moderate-income borrowers significantly exceeded the aggregate industry distribution in 2010, although was somewhat below the aggregate industry distribution in 2011.

Secondary to the aggregate industry lending data, we also considered comparison to demographic data, which supported the bank’s performance. The percentage of loans made by the bank to low-income borrowers is below the percentage of low-income families in the AA for each loan type in 2010 and 2011. However, management’s ability to lend to low-income borrowers is somewhat impacted by the 8.58% of households living below the poverty level, as these households typically do not have an income which would support purchasing or owning a home. The percentage of loans made by the bank to moderate-income borrowers well exceeds the percentage of moderate-income families in the AA for both types in 2010 and 2011, except for refinance loans in 2011.

Geographic Distribution of Loans

Overall, Generations met the standard for satisfactory performance during the evaluation period for the distribution of home mortgage loans to census tracts of different income levels in both the Seneca/Cayuga and Ontario AAs. The tables in this section illustrate loan originations during the evaluation period categorized by loan type and census tract income designation within each respective AA. The tables compare the percentage of bank loans made to the aggregate industry percentage of loans made in each census tract designation, as well as, to the percentage of owner-occupied units in each census tract designation.

Geographic Distribution in the Seneca/Cayuga AA

Table 6.0(a) - Geographic Distribution of Seneca/Cayuga AA Home Purchase Loans							
Borrower Income Level	2010			2011			% Owner Occupied Units
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
Moderate	0	0.0%	1.8%	0	0.0%	1.7%	1.4%
Middle	48	69.6%	79.7%	63	87.5%	77.2%	80.7%
Upper	21	30.4%	18.4%	9	12.5%	21.1%	17.9%
Total	69	100.0%	100.0%	72	100.0%	100.0%	100.0%

Table 6.0(b) - Geographic Distribution of Seneca/Cayuga AA Home Refinance Loans							
Borrower Income Level	2010			2011			% Owner Occupied Units
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
Moderate	1	3.3%	0.9%	1	1.6%	1.0%	1.4%
Middle	20	66.7%	77.3%	41	65.1%	83.6%	80.7%
Upper	9	30.0%	21.8%	21	33.3%	15.4%	17.9%
Total	30	100.0%	100.0%	63	100.0%	100.0%	100.0%

Table 6.0(c) – Geographic Distribution of Seneca/Cayuga AA Home Improvement Loans							
Borrower Income Level	2010			2011			% Owner Occupied Units
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
Moderate	0	0.0%	1.3%	0	0.0%	1.0%	1.4%
Middle	0	0.0%	79.3%	5	100.0%	83.6%	80.7%
Upper	0	0.0%	19.4%	0	0.0%	15.4%	17.9%
Total	0	100.0%	100.0%	5	100.0%	100.0%	100.0%

Source: Aggregate HMDA data 2010-2011; 2000 U.S. Census data

The bank’s lending in the moderate-income census tract is below the aggregate industry distribution for home purchase loans, but above the aggregate industry distribution for home refinance loans for both 2010 and 2011. When compared to the percentage of owner-occupied units with the designated census tracts, the bank’s distribution is below the comparator in the moderate-income census tract for home purchase loans but above the comparator for home refinance loans, in both 2010 and 2011.

Geographic Distribution in the Ontario AA

Table 6.1(a) – Geographic Distribution of Ontario AA Home Purchase Loans							
Borrower Income Level	2010			2011			% Owner Occupied Units
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	2	12.5%	2.3%	0	0.0%	3.6%	3.5%
Moderate	1	6.2%	1.7%	0	0.0%	1.5%	2.9%
Middle	13	81.3%	96.0%	13	100.0%	94.9%	93.6%
Upper	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
Total	16	100.0%	100.0%	13	100.0%	100.0%	100.0%

Table 6.1(b) – Geographic Distribution of Ontario AA Home Refinance Loans							
Borrower Income Level	2010			2011			% Owner Occupied Units
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	1.4%	0	0.0%	8.8%	3.5%
Moderate	0	0.0%	0.9%	2	15.4%	21.5%	2.9%
Middle	11	100.0%	97.7%	5	38.5%	29.9%	93.6%
Upper	0	0.0%	0.0%	6	46.1%	39.8%	0.0%
Total	11	100.0%	100.0%	13	100.0%	100.0%	100.0%

Borrower Income Level	2010			2011			% Owner Occupied Units
	Generations Bank		Aggregate Percent	Generations Bank		Aggregate Percent	
	Number	%		Number	%		
Low	0	0.0%	1.7%	0	0.0%	3.2%	3.5%
Moderate	0	0.0%	3.5%	0	0.0%	2.9%	2.9%
Middle	1	100.0%	94.8%	2	100.0%	93.9%	93.6%
Upper	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
Total	1	100.0%	100.0%	2	100.0%	100.0%	100.0%

Source: Aggregate HMDA data 2010-2011; 2000 U.S. Census data

The bank's lending in the low-income census tract is below the aggregate industry distribution for both home purchase and refinance loans in 2010 and 2011, except for home purchase loans in 2010 when the bank's lending significantly exceeded the aggregate industry distribution. The bank's lending in the moderate-income census tract is above the aggregate industry distribution for home purchase loans in 2010 and below the aggregate industry distribution in 2011. Regarding home refinance loans in the moderate-income census tract, the bank's lending is below the aggregate industry distribution in 2010 and 2011. When compared to the percentage of owner-occupied units with the designated census tracts, the bank's distribution is above the comparator in the low- and moderate-income tracts for home purchase loans in 2010, but below the comparator in the census tracts for 2011. For refinance loans, the bank's lending was below the comparator in both census tracts in 2010, as well as, the low-income tract for 2011. However, home refinance lending in the moderate-income tract in 2011 exceeded the comparator.

Responses to Complaints

Generations received no complaints pertaining to its CRA performance since the prior examination.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.