



PUBLIC DISCLOSURE

December 3, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sunnyside FS & LA of Irvington
Charter Number 702397

56 Main St
Irvington, New York 10533

Office of the Comptroller of the Currency

340 Madison Ave
New York, New York 10173

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

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Overall CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

- The quarterly loan-to-deposit ratio is reasonable.
- A majority of loans, by number and dollar volume, were originated inside the bank's assessment area (AA).
- The distribution of loans to low- and moderate-income individuals and businesses with gross annual revenue below \$1 million reflects reasonable penetration consistent with the bank's size and lending opportunities.

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

Sunnyside Federal Savings and Loan Association of Irvington (Sunnyside Federal) was founded as a federal mutual savings association in 1930 and converted to a stock institution in 2013. Sunnyside Federal is headquartered and conducts business from its sole office located in Irvington, New York. Irvington is a village in the town of Greenburgh, which is located in Westchester County approximately 25 miles north of New York City. The bank is wholly-owned by Sunnyside Bancorp Inc., a one-bank holding company. Sunnyside Federal did not open or close branches during the evaluation period, and maintains its sole ATM on-site at its Irvington branch.

Sunnyside Federal offers conventional loan and deposit products for both retail and commercial customers. Over the past few years, the bank has increased its small business lending, while curtailing its one-to-four family residential mortgage lending. Deposit products include basic checking, NOW accounts, certificate of deposit accounts, and individual retirement accounts.

As of December 31, 2017, Sunnyside Federal had total assets of \$88 million, with \$74 million in total deposits and \$49 million in net loans. The loan portfolio consists of approximately \$26 million in residential real estate loans, predominantly mortgages on one-to-four family dwellings, \$8 million in nonresidential real estate loans, approximately \$7 million in student loans, \$3 million in multifamily commercial real estate loans, and less than \$2 million in commercial and industrial loans.

Sunnyside Federal operates in a competitive financial services market in the New York metropolitan area with multiple international, regional, and local institutions. There are no financial or legal impediments that hinder the bank's ability to help meet the credit needs of the communities it serves. The bank received a "Satisfactory" rating on its prior CRA Performance Evaluation dated August 11, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the bank using the small bank performance criteria, which consists of a lending test. The evaluation period for the lending test is January 1, 2015 through December 31, 2017. Due to changes in census data effective in 2017, we evaluated the bank's 2017 lending performance separately from the bank's 2015 and 2016 lending performance. Based on a review of the number and dollar amount of loans originated, we determined that home mortgage loans were the bank's primary loan product during this evaluation period. Additionally, we considered the bank's small business loans, home equity lines of credit, as well as community development loans, services, and investments.

Data Integrity

Prior to this evaluation, the OCC conducted a data integrity review, testing the accuracy of the bank's loan data for the period of January 1, 2015 through December 31, 2017. The review identified errors that required correction. This evaluation is based on the corrected data. The OCC also validated all community development loans, investments, and/or services included in this performance evaluation met the regulatory definitions for community development.

Selection of Areas for Full-Scope Review

We completed a full-scope review for the bank's one AA, consisting of 16 contiguous census tracts that include portions of the towns of Greenburgh, Ossining, and Mount Pleasant in Westchester County, New York. Westchester County is part of the New York-Jersey City-White Plains, NY-NJ Metropolitan Division (MD 35614). Sunnyside Federal's AA remains unchanged from its previous CRA evaluation. The AA complies with the CRA guidelines and does not arbitrarily exclude low- or moderate-income (LMI) geographies.

Ratings

Sunnyside Federal's overall rating is based on the full-scope review of its single AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 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

Sunnyside Federal's performance under the lending test is satisfactory.

Loan-to-Deposit Ratio

Sunnyside Federal's loan-to-deposit ratio is reasonable. The bank's average loan-to-deposit ratio over the fourteen quarters from September 30, 2014 through December 31, 2017 was 60.94 percent. During this period, the bank's loan-to-deposit performance ranged from a low of 48.39 percent on September 30, 2014 to a high of 67.19 percent on September 30, 2017.

Sunnyside Federal's average loan-to-deposit ratio compares reasonably well to the average of three similarly situated savings banks over the same time period. The loan-to-deposit ratios for the three other institutions averaged 53.94 percent, ranging from 17.47 percent to 79.32 percent.

Lending in Assessment Area

Based on the data in Table D below, we concluded the inside/outside ratio of the bank's origination of loans is reasonable and meets the standard for satisfactory performance. By number and dollar amount, a majority of loan originations were inside the bank's AA. Table D below details the bank's lending activities with respect to its AA by number and dollar volume of loans.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	4	100.0	0	0.0	4	688	100.0	0	0.0	688
2016	2	100.0	0	0.0	2	2,011	100.0	0	0.0	2,011
2017	7	100.0	0	0.0	7	3,530	100.0	0	0.0	3,530
Subtotal	13	100.0	0	0.0	13	6,229	100.0	0	0.0	6,229
Small Business										
2015	1	20.0	4	80.0	5	54	3.7	1,423	96.3	1,477
2016	2	50.0	2	50.0	4	604	42.2	828	57.8	1,432
2017	0	0.0	2	100.0	2	0	0.0	663	100.0	663
Subtotal	3	27.3	8	72.7	11	658	18.4	2,914	81.6	3,572
Total	16	66.7	8	33.3	24	6,887	70.3	2,914	29.7	9,801
<i>Source: 1/1/2015 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>										

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

Home Mortgage Loans

Based on the data in Tables P 2015-16 and 2017, located in Appendix C, and the following performance context considerations, we concluded the borrower distribution of the bank's home mortgage loan originations is reasonable.

The tables show that Sunnyside Federal did not originate any home mortgage loans to low- or moderate-income (LMI) borrowers within its AA during the evaluation period. For all lenders, the proportion of loans to LMI borrowers is similarly minimal at 2.8 percent and 3.1 percent, respectively. Although the proportion of loans to LMI borrowers is weaker than the proportion of LMI families, the bank and industry performance was impacted by the metropolitan area's high median housing value, which constrains lending opportunities to LMI borrowers. The AA's median housing value is \$591

thousand. The maximum income level for low-income borrowers is under \$37 thousand, making the median housing value greater than 15 times over the maximum low-income level. The maximum income level for moderate-income borrowers is under \$59 thousand, making the median housing value greater than ten times over the maximum moderate-income level. Furthermore, the bank operates in a highly competitive financial services market. In 2017, 170 lenders originated loans in this AA, for which the proportion of LMI families to total families is low at 18.7 percent.

Small Loans to Businesses

Based on the data in Tables R 2015-16 and 2017, located in Appendix C, and the following performance context considerations, we concluded the bank's originations of small loans to businesses by revenue is reasonable.

For 2015 and 2016, the proportion of loans was stronger than the proportion of small businesses and stronger than the aggregate distribution of loans to those businesses. For 2017, the proportion of loans was weaker than the proportion of small businesses and weaker than the aggregate distribution of loans to those businesses as the bank did not originate any small loans to businesses within its AA.

Geographic Distribution of Loans

Home Mortgage Loans

Based on the data in Tables O 2015-16 and 2017, located in Appendix C, and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations is reasonable.

For 2015 and 2016, Sunnyside Federal's AA contained no LMI geographies and consisted of 14 upper-income census tracts and two middle-income census tracts. As there were no LMI geographies for this period, evaluating lending activity by census tract income level would not be meaningful. However, the census data changes effective in 2017 impacted tract income designations in the bank's AA. As a result, the bank's AA in 2017 consisted of 14 upper-income tracts and two moderate-income tracts and we evaluated the geographic distribution of the bank's loans for this period.

For 2017, the distribution of the bank's home mortgage loans in low- and moderate-income geographies is reasonable. The proportion of loans was weaker than the proportion of owner-occupied housing units in moderate-income geographies and weaker than the aggregate distribution of loans in moderate-income geographies. Although the bank did not originate any loans in the moderate-income tracts, lending opportunities are limited. The proportion of owner-occupied housing units in moderate income geographies is very low and the level of competition is high.

Small Loans to Businesses

For 2017, Sunnyside Federal originated only two small loans to businesses and these loans were outside the AA. Data for the geographic distribution of small loans to businesses is contained in Tables Q 2015-16 and 2017.

Community Development Activities

During the evaluation period, Sunnyside Federal demonstrated commitment to addressing the community development needs of its AA. The bank originated a \$500,000 loan to an organization that provides community services for LMI seniors in Westchester County. The bank also made two donations, totaling \$2,300, to the Federal Home Loan Bank (FHLB) of New York's Affordable Housing Program. This program helps fund numerous affordable housing initiatives within the FHLB of New York's geographic footprint, which includes Sunnyside Federal's AA.

Responses to Complaints

Sunnyside Federal 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 (excludes CD loans): 01/01/2015 to 12/31/2017 Investment and Service Tests and CD Loans: 08/11/2014 to 12/31/2017	
Financial Institution		Products Reviewed
Sunnyside Federal Savings & Loan Association of Irvington (Sunnyside Federal) Irvington, NY		Home Mortgage Loans Small Business Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New York New York-Jersey City-White Plains, NY-NJ MD (MD35614)	Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Sunnyside AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	12.5	0.0	87.5	0.0
Population by Geography	81,716	0.0	14.8	0.0	85.2	0.0
Housing Units by Geography	29,341	0.0	15.0	0.0	85.0	0.0
Owner-Occupied Units by Geography	18,683	0.0	6.8	0.0	93.2	0.0
Occupied Rental Units by Geography	9,074	0.0	32.3	0.0	67.7	0.0
Vacant Units by Geography	1,584	0.0	11.9	0.0	88.1	0.0
Businesses by Geography	6,722	0.0	8.3	0.0	91.7	0.0
Farms by Geography	118	0.0	16.9	0.0	83.1	0.0
Family Distribution by Income Level	20,426	10.8	7.9	10.8	70.5	0.0
Household Distribution by Income Level	27,757	12.5	9.3	11.8	66.5	0.0
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047	Median Housing Value			\$590,703
			Median Gross Rent			\$1,578
			Families Below Poverty Level			4.5%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Sunnyside Federal identified one AA consisting of 16 contiguous census tracts that include portions of the towns of Greenburgh, Ossining, and Mount Pleasant in Westchester County, NY. Irvington, where the bank is located, is an affluent suburban village in the town of Greenburgh. The AA is located in the New York-Jersey City-White Plains, NY-NJ MD (35614), which is part of the larger New York-Newark-Jersey City NY-NJ-PA MSA (35620).

As of 2017, the AA's 16 census tracts consist of two moderate-income tracts and 14 upper-income tracts. In 2015 and 2016, the two moderate-income tracts were designated as middle-income.

The overall population of the AA is 81,716, comprising 27,757 households and 20,426 families. Of this population, 12,094 (14.8%) individuals reside in moderate-income geographies, and 69,622 (85.2%) reside in upper-income geographies.

The median family income in this AA is \$72,047. With respect to family distribution by income level, 10.8% in the AA are low-income, 7.9% are moderate-income, 10.8% are middle-income, and 70.5% are upper-income. Within this AA, 4.5% of families are below poverty level.

The median housing value in this AA is \$590,703. This high median housing value constrains lending opportunities to LMI borrowers, as the proportion of properties affordable to LMI

borrowers is limited. The maximum income level for low-income borrowers is under \$37 thousand, making the median housing value greater than 15 times over the maximum low-income level. The maximum income level for moderate-income borrowers is under \$59 thousand, making the median housing value greater than ten times over the maximum moderate-income level.

Competition within the AA is strong with the market dominated by large national and regional financial institutions and national mortgage companies. Sunnyside Federal is a one-branch bank located in Westchester County, with one ATM, which is located at the branch. According to the Federal Deposit Insurance Corporation's Deposit Market Share Report as of June 30, 2017, out of 34 institutions operating in Westchester County, Sunnyside ranked 29th in deposit market share with 0.07 percent of the market. The top five financial institutions have a combined deposit market share of 78.85%, and include Morgan Stanley Private Bank, N. A. (49.56% market share), JP Morgan Chase Bank, N. A. (14.03% market share), Citibank, N. A. (7.32%), Wells Fargo, N. A. (4.23% market share), and Emigrant Bank (3.71%).

Based on 2017 Peer Mortgage Data, 170 lenders originated loans in the bank's AA. The top five mortgage lenders in this AA have a combined total market share of 42.6% and include Wells Fargo Bank, N. A. (13.97% market share), JP Morgan Chase, N. A. (10.91% market share), Quicken Loans (7.23% market share), Citibank, N. A. (5.63% market share), and Bank of America, N. A. (4.86% market share).

According to the 2017 Business Demographic Data, there are a total of 6,840 businesses in the AA. The primary industries in the AA are Services, which account for 53.71% of the total industries, followed by Retail Trade and Finance, Insurance, and Real Estate at 11.48% and 9.01%, respectively. Approximately 12.5% of the businesses are located in moderate-income geographies, and 87.5% are located in upper-income geographies. Approximately 87.25% of the businesses reporting have revenues of less than \$1 million.

The top employers in the Hudson Valley region, which includes the counties of Dutchess, Orange, Putnam, Rockland, Sullivan, Ulster, and Westchester, are Crystal Run Healthcare, Home Depot, IBM Corp., Nyack Hospital, Orange Regional Medical Center, Regeneron Pharmaceuticals, Inc., ShopRite Supermarkets, Stop & Shop Supermarkets, Walmart, and Westchester Medical Center.

As of December 2017, the U.S. Bureau of Labor Statistics (BLS) reported the unemployment rate for Westchester County was 4.4%. For the same period, the BLS reported the unemployment rate for the New York-Newark-Jersey City, NY-NJ-PA MSA as 4.5%, for New York as 4.6%, and the national unemployment rate as 4.1%.¹

¹ The national unemployment rate is seasonally adjusted. The unemployment rates for the counties and the state are not seasonally adjusted.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Sunnyside AA	6	2,699	100.0	1,537	0.0	0.0	0.0	0.0	0.0	0.0	10.8	16.7	12.8	89.2	83.3	87.2	0.0	0.0	0.0
Total	6	2,699	100.0	1,537	0.0	0.0	0.0	0.0	0.0	0.0	10.8	16.7	12.8	89.2	83.3	87.2	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Sunnyside AA	7	3,530	100.0	1,448	0.0	0.0	0.0	6.8	0.0	9.1	0.0	0.0	0.0	93.2	100.0	90.9	0.0	0.0	0.0
Total	7	3,530	100.0	1,448	0.0	0.0	0.0	6.8	0.0	9.1	0.0	0.0	0.0	93.2	100.0	90.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Sunnyside AA	6	2,699	100.0	1,537	8.8	0.0	0.1	7.0	0.0	2.7	11.8	16.7	7.9	72.4	33.3	81.5	0.0	50.0	7.7
Total	6	2,699	100.0	1,537	8.8	0.0	0.1	7.0	0.0	2.7	11.8	16.7	7.9	72.4	33.3	81.5	0.0	50.0	7.7

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Sunnyside AA	7	3,530	100.0	1,448	10.8	0.0	0.6	7.9	0.0	2.5	10.8	0.0	8.1	70.5	28.6	82.0	0.0	71.4	6.8
Total	7	3,530	100.0	1,448	10.8	0.0	0.6	7.9	0.0	2.5	10.8	0.0	8.1	70.5	28.6	82.0	0.0	71.4	6.8

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Sunnyside AA	3	658	100.0	2,745	0.0	0.0	0.0	0.0	0.0	0.0	17.5	33.3	18.3	82.5	66.7	81.7	0.0	0.0	0.0
Total	3	658	100.0	2,745	0.0	0.0	0.0	0.0	0.0	0.0	17.5	33.3	18.3	82.5	66.7	81.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Sunnyside AA	0	0	0.0	2,591	0.0	0.0	0.0	8.3	0.0	8.4	0.0	0.0	0.0	91.7	0.0	91.6	0.0	0.0	0.0
Total	0	0	0.0	2,591	0.0	0.0	0.0	8.3	0.0	8.4	0.0	0.0	0.0	91.7	0.0	91.6	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Sunnyside AA	3	658	100.0	2,745	86.9	100.0	41.6	6.3	0.0	6.8	0.0	
Total	3	658	100.0	2,745	86.9	100.0	41.6	6.3	0.0	6.8	0.0	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Sunnyside AA	0	0	0.0	2,591	87.1	0.0	51.8	6.1	0.0	6.8	0.0	
Total	0	0	0.0	2,591	87.1	0.0	51.8	6.1	0.0	6.8	0.0	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0