



## **PUBLIC DISCLOSURE**

August 05, 2013

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Trustco Bank  
Charter Number 707635

1 Sarnowski Drive  
Glenville, New York 12302

Office of the Comptroller of the Currency

New York - Jersey City  
Harborside Financial Center - Plaza Five  
Jersey City, New Jersey 07311

**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 Community Reinvestment Act Rating

**Institution’s Community Reinvestment Act Rating:** This institution is rated **Satisfactory**.

The following table indicates the performance level of Trustco Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	Trustco Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs of its assessment areas (AAs);
- A high percentage of home mortgage loans and small loans to businesses are originated within the bank’s combined AAs;
- The distribution of loans to borrowers reflects good distribution of retail customers of different income levels and business customers of different size;
- The overall geographic distribution of loans reflects good penetration throughout the AAs;
- Community development lending had a positive impact on the Lending Test rating;
- Trustco has an adequate level of qualified community development investments, donations, and grants;
- Trustco provides a relatively high level of community development services.

## 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/AA.

**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 usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on 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/AA.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**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

Trustco Bank (Trustco or the bank) is a \$4.4 billion thrift headquartered in Glenville, New York. The bank conducts operations through branches located in the eastern part of New York State and central Florida with a limited presence in New Jersey, Massachusetts, and Vermont. The bank is principally a one- to-four family lender, but also offers multifamily loans, nonresidential mortgages, commercial unsecured loans, and consumer loans. The institution is fully owned by TrustCo Bank Corp. NY, a publicly traded company.

As of June 30, 2013, the bank operated 138 branches. During the review period, Trustco added seven branches to their network, with expansion primarily focused in Florida. The bank added four locations in this region, increasing the number of branches in the State to 45. The bank also added three new branches in New York bringing the state total to 86. The bank closed no branches but relocated one to a nearby building in Saratoga County, New York. The distribution of the new branches includes one located in a moderate-income geography, four located in a middle-income geography, and one in a high-income geography. Trustco Bank operates 146 Automatic Teller Machines throughout the bank's market areas of Florida, Vermont, Massachusetts, New York, and New Jersey.

As of June 30, 2013, Trustco's loan portfolio totaled \$2.7 billion or 61.1 percent of total assets. Ninety-nine percent of the portfolio was held in real estate loans with the remaining \$27 million in commercial loans. 1-4 family residential mortgages comprise 90 percent or \$2.43 billion of the loan portfolio. The bank has \$357 million in Tier 1 capital, which has grown consistently since 2010.

The institution offers a full line of loan products and deposit and non-deposit services, but the bank primarily engages in residential mortgage lending funded through locally gathered deposits and borrowed funds. Loan products include fixed and adjustable-rate one-to-four family loans for purchase, refinance and construction. The bank also offers traditional commercial and consumer lending products.

The Office of Thrift Supervision completed the last CRA examination on January 5, 2010. Trustco received an overall Satisfactory rating with High Satisfactory ratings for the Lending Test and Service Test and a Low Satisfactory rating for the Investment Test.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, with the exception of Community Development Loans, is January 1, 2011 through June 30, 2013. This review is impacted by the 2010 census changes that went into effect on January 1, 2012. Due to these changes, loan data from 2010 cannot be combined with loan data from 2011 and 2012, as each set must be evaluated under different census data. Loan data between January 1, 2011 and December 31, 2011 will be evaluated against 2000 census data. Loan data between January 1, 2012 and June 30, 2013 will be evaluated against 2010 census data. This will result in multiple analyses and multiple presentations of this data throughout this Performance Evaluation (PE). Lending market share data and statistics is based on 2011 and 2012 Peer Mortgage Data.

Conclusions regarding the bank's lending performance are based on Home Mortgage Disclosure Act (HMDA) reportable loans and small business loans from January 1, 2011 through June 30, 2013.

For Community Development (CD) Loans, and the Investment and Service Tests, the evaluation period is from January 5, 2011 through August 5, 2013. The Investment Test included a review of investments, grants, and donations made in the bank's AAs that meet the definition of community development. Any qualified investments originated in prior periods and still outstanding at August 5, 2013 were given appropriate consideration. The Service Test included a review of retail and community development services provided in the bank's AAs.

### Data Integrity

Prior to this examination, we tested the accuracy of Trustco's Home Mortgage Disclosure Act (HMDA) and CRA small business data. Results of this testing evidenced the data is reasonably accurate and can be relied upon for this CRA evaluation.

### Selection of Areas for Full-Scope Review

Based on our review of HMDA and CRA data, branch dispersion, deposit market share, and demographic information, we identified the following AAs (AAs) for full scope review: Albany-Schenectady-Troy, NY MSA 10580; New York-Wayne-White Plains, NY-NJ Metropolitan District 35644 located in the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area; Orlando-Kissimmee-Sanford County, FL MSA 36740; Non-MSA Vermont- Bennington and Berkshire, MA MSA 38340.

We conducted limited scope reviews on the following AAs: Glens Falls, NY MSA 24020; Kingston, NY MSA 28740; Poughkeepsie-Newburgh-Middletown, NY MSA 39100; Columbia County and Green County, non-MSA; Volusia, FL MSA 19660; Polk, FL MSA 29460; Manatee-Sarasota, FL MSA 35840; Brevard, FL MSA 37340; Charlotte, FL MSA 39460; Hillsborough, FL MSA 45300; and Palm Beach, FL MSA 48424.

The AAs are consistent with the requirements of the regulation. The AAs do not arbitrarily exclude low- or moderate-income geographies. The AAs do not reflect illegal discrimination.

## **Ratings**

The bank's overall rating is a blend of the Multistate Metropolitan Area Rating and the State Ratings. The Multistate Metropolitan Area Rating and the State Ratings are based primarily on those areas that received full-scope reviews. The State of New York rating was more heavily weighted in arriving at the overall rating since that is where a majority of the bank's overall lending activities, deposits, and branches are located. Within the State of New York, the Albany-Schenectady-Troy MSA 10580 was rated the heaviest of the AAs. The Lending Test was rated more heavily than the Investment or Service Test. Within the Lending Test, home mortgages received a greater weight than small loans to businesses as home mortgages accounted for 94 percent of the number of originations in the AAs. Within home mortgage lending, we placed more weight on home refinance lending than home purchase or home improvement lending. Home refinance lending accounted for 56 percent of all home mortgage originations.

## **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.

## **Multistate Metropolitan Area Rating**

### **New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area**

**CRA rating for the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area<sup>1</sup>: Satisfactory**

**The lending test is rated: Low Satisfactory**

**The investment test is rated: Low Satisfactory**

**The service test is rated: Low Satisfactory**

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to the community credit needs of the AA;
- A substantial majority of home mortgage loans and small loans to small businesses are originated within the bank's AA;
- The geographic distribution of loans reflects good penetration throughout the AA;
- The distribution of loans to borrowers reflects poor distribution among retail customers of different income levels and business customers of different sizes;
- The bank made an adequate level of qualified community development investments, donations, and grants;
- Delivery systems are accessible to essentially all portions of the AA. Trustco provides an adequate level community development services.

### **Description of Institution's Operations**

Trustco has one AA within the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area, namely the New York-Wayne-White Plains, NY-NJ Metropolitan District 35644 (NY-W-WP AA).

### **Scope of Evaluation**

We conducted a full-scope review of the NY-W-WP AA as all of the bank's Multistate Area branches, deposits, and loan originations are in this AA. There are 16 branches in this AA; 14 of the branches are in the state of New York and two are in New Jersey. In the Multistate Area, 5.7 percent of the bank's deposits, 2.4 percent of the bank's home mortgage lending, and 2.5 percent of the bank's small loans to businesses were originated in the NY-W-WP AA. During the evaluation period, approximately 93

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<sup>1</sup>This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

percent of loans were home mortgage loans. Small loans to businesses made up the remaining seven percent of lending activity.

### **Community Contact**

We utilized recent community contact information extracted from the OCC Community Contact database during this evaluation to identify community development needs and opportunities within the New York-Wayne-White Plains, NY-NJ MD 35644 AA. Refer to the Market Profile section in Appendix C for details.

## **LENDING TEST**

The bank's performance under the lending test in the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area is rated Low Satisfactory.

### **Lending Activity**

Lending levels reflect adequate responsiveness to AA credit needs after taking into consideration the level of competition in the AA. Refer to Table 1 Lending Volume in the New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Trustco has 16 branches in the NY-W-WP AA and 9.2 percent of the bank's total deposits were in this AA as of June 30, 2012. Competition for both loans and deposits is very strong, especially from larger multistate financial institutions. According to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco held just 0.37 percent of the deposit market share in this MD. According to the same deposit data, Trustco's major competitors in the NY-W-WP AA are JP Morgan Chase Bank (first with 191 branches and 15.8 percent deposit share), Morgan Stanley (second with one branch and 10.76 percent share), TD Bank (third with 64 branches and 7.86 percent share), Hudson City Savings Bank (fourth with 36 branches and 7.74 percent share) and Citibank (fifth with 34 branches and 7.15 percent share).

The 2011 Peer Mortgage Data indicates Trustco ranked 88<sup>th</sup> out of 356 mortgage lenders with a market share of 0.13 percent for all home mortgage loans. Based on 2011 Peer Small Business Data, Trustco is ranked 74<sup>th</sup> out of 136 lenders with a market share of 0.01 percent. Of the total loans originated in this AA, 94 percent were home mortgage loans and 6 percent were small loans to businesses. Among home mortgage originations in this AA, 43 percent were home purchase loans, 1 percent was home improvement loans, and 56 percent were home refinance loans.

According to the 2012 Peer Mortgage Data, Trustco ranked 62<sup>nd</sup> out of 607 mortgage lenders with a market share of 0.26 percent for all home mortgage loans. Based on the 2012 Peer Small Business Data, Trustco ranked 50<sup>th</sup> out of 100 lenders with a market share of 0.01 percent. Of the total loans originated in this AA, 98 percent were home mortgage loans and 2 percent were small loans to businesses. Among home mortgage originations in this AA, 43 percent were home purchase loans and 67 percent were home refinance loans.

For the evaluation period, using the 2010 U.S. Census data, 94 percent were home mortgage loans and 6 percent were small loans to businesses. Among home mortgage originations in this AA, 43 percent were

home purchase loans, one percent was home improvement loans, and 56 percent were home refinance loans.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans reflects good penetration throughout the AA. The overall geographic distribution of home mortgage loans is good. The overall geographic distribution of small loans to businesses is good.

In the evaluation period using 2000 U.S. Census data, Trustco did not originate any home mortgage loans to borrowers in low-income geographies. As such, 2011 Peer Mortgage data does not rank Trustco on the list of institutions lending to low-income geographies. Based on the same data, Trustco ranked 54<sup>th</sup> out of 287 lenders with a 0.29 percent market share of HMDA loans in moderate-income geographies.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3, and 4 in the Multistate AA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### ***Home Purchase Lending***

The geographic distribution of home purchase lending is good.

For the evaluation period using 2000 U.S. Census data, the bank did not originate any home purchase loans in low-income geographies. The aggregate lenders originated 0.22 percent of total HMDA loans in low-income areas. In the evaluation period using 2010 U.S. Census data, the bank originated 4.11 percent of HMDA loans in low-income geographies, compared to the aggregate lenders that originated 0.34 percent of HMDA loans in these areas. In this evaluation period, the percentage of home purchase lending in low-income geographies exceeded the percentage of owner-occupied units in low-income geographies. In both evaluation periods, owner occupied units in low-income geographies made up less than one percent of owner-occupied units in the AA.

For the evaluation period using 2000 U.S. Census data, Trustco did not originate any home purchase loans in moderate-income geographies. The aggregate lenders originated 1.26 percent of total HMDA loans in moderate-income geographies. In this evaluation period, owner-occupied units in moderate-income geographies made up just over one percent of owner-occupied units in the AA. In the evaluation period using 2010 U.S. Census data, Trustco originated 4.11 percent of HMDA loans in moderate-income geographies, which exceeds the aggregate lenders originations of 1.87 percent of HMDA loans in these areas. For this time period, Trustco's percentage of home purchase lending in moderate-income geographies exceeds the percentage of owner-occupied housing units in these geographies.

#### ***Home Improvement Lending***

The geographic distribution of home improvement lending is adequate.

The bank made only one HMDA home improvement loan in the evaluation period using 2000 U.S. Census data and one in the evaluation period using 2010 U.S. Census data. Neither loan was made in a low- or moderate-income geography. Based on 2000 U.S. Census data, the aggregate lenders originated 0.18 percent and 0.89 percent of total HMDA loans in low- and moderate-income geographies, respectively. Owner-occupied units in low- and moderate-income geographies were 0.22 percent and 1.09 percent, respectively, of total owner-occupied units in the AA. Based on 2010 U.S. Census data,

the aggregate lenders originated 0.06 percent and 1.56 percent of total HMDA loans in low- and moderate-income geographies, respectively. Owner-occupied units in low- and moderate-income geographies were 0.23 percent and 2.03 percent, respectively, of total owner-occupied units in the AA. Due to the bank's limited activity, we placed little weight on this type of lending when evaluating the bank's distribution of loans by income level.

### ***Home Refinance Lending***

The geographic distribution of home refinance lending is good.

For the evaluation period using 2000 U.S. Census data, the bank originated a combined 2.63 percent of the total HMDA home refinance loans to borrowers in low- and moderate-income geographies. In that evaluation period, the aggregate lenders originated just 0.57 percent of total HMDA loans in these areas. For the evaluation period using 2000 U.S. Census data, the bank did not originate home refinance loans in low-income geographies. For the evaluation period using 2000 U.S. Census data, the percentage of home refinance lending in moderate-income geographies exceeds the percentage of owner-occupied housing units in these geographies.

For the evaluation period using the 2010 U.S. Census data, the bank originated 1.06 percent of the total HMDA home refinance loans to borrowers in low-income geographies and none to borrowers in moderate-income geographies. In this evaluation period, the aggregate lenders originated 0.12 percent of total HMDA loans in low-income areas and 0.84 percent of total HMDA loans in moderate-income areas. The percentage of home refinance lending in low-income geographies exceeds the percentage of owner-occupied housing units in these geographies.

### ***Small Loans to Businesses***

Refer to Table 6 in the New York-Wayne-White Plains, NY-NJ Multistate MD section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

For the evaluation period using 2000 U.S. Census data, the bank originated four small loans to businesses in the AA. The bank did not originate any loans in low-income geographies, however, only 0.85 percent of small businesses are located within the low-income geographies. The aggregate lenders originated 0.69 percent of their loans to small businesses in low-income geographies. The bank originated 25.00 percent of their total small loans to businesses to businesses located in moderate-income geographies; this significantly exceeds both the 4.35 percent of small businesses in moderate-income geographies and the aggregate lenders proportion of small loans to businesses in moderate-income geographies of 3.09 percent.

For the evaluation period using 2010 U.S. Census data, the bank originated 11 small loans to businesses in the AA. None of these small loans to businesses was originated to businesses located in low-income geographies; the aggregate lenders originated 1.30 percent of small loans to businesses. The proportion of businesses in low-income geographies is only 1.07 percent. The bank originated 36.36 percent of their small loans to businesses located in moderate-income geographies, which significantly exceeds the 6.09 percent of businesses located in moderate-income geographies. The bank's performance also significantly exceeds the aggregate lenders 4.58 percent of small loans to businesses in moderate-income geographies.

***Lending Gap Analysis***

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in Trustco's lending patterns.

***Inside/Outside Ratio***

Trustco originated a substantial majority of its loans in their combined AAs during both evaluation periods. During the combined evaluation period, 92 percent of the total number of loans and 92 percent of the total dollar amount of HMDA reportable loans were made in this AA. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

**Distribution of Loans by Income Level of the Borrower**

The overall distribution of loans to borrowers of different income levels and businesses of different sizes in this AA reflects poor distribution. Trustco's distribution of home mortgage loans by borrower income level is poor, and Trustco's distribution of small loans to businesses of different sizes is adequate.

Trustco did not originate any home mortgage loans to low-income borrowers in either evaluation period. As such, 2011 Peer Mortgage data does not rank Trustco on the list of institutions lending to low-income geographies. Based on the same data, Trustco ranked 47<sup>th</sup> out of 182 lenders with a 0.31 percent market share of HMDA loans to moderate-income families.

In our analysis, we considered the lack of affordability for a low-income family to purchase a home. The average median housing value in the AA was \$507,493, and a low-income family earns less than \$35,150 annually. The lack of affordability limits the opportunities for home purchase, home improvement, and home refinance lending to low-income families.

***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the New York-Wayne-White Plains, NY-NJ Multistate MD 35644 AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

***Home Purchase Lending***

The borrower distribution for home purchase lending is poor.

For both evaluation periods, the bank made no home purchase loans to low-income families. The aggregate lenders originated 0.62 percent and 0.61 percent of total HMDA loans, respectively, in the two evaluation periods. For both evaluation periods, the percentage of HMDA home purchase lending to moderate-income borrowers is lower than the aggregate lenders originations of HMDA loans of 4.90 percent and 5.26 percent, respectively. For both evaluation periods, the percentage of HMDA home purchase lending to moderate-income borrowers is lower than the percentage of moderate-income families in the AA.

***Home Improvement Lending***

The borrower distribution for home improvement lending is poor.

In both evaluation periods, the bank only made one home improvement loan in the AA. For the evaluation period using 2000 U.S. Census data, the one home improvement loan was made to an upper-income family. The aggregate lenders originated 2.06 percent and 6.67 percent of loans to low- and

moderate-income borrowers, respectively, in this evaluation period. For the evaluation period using 2010 U.S. Census data, the one home improvement loan was made to an upper-income family. The aggregate lenders originated 2.43 percent and 7.90 percent of loans to low- and moderate-income borrowers, respectively, in this evaluation period. We placed little weight on this type of lending when evaluating the bank's distribution of loans by income level of the borrower.

### ***Home Refinance Lending***

The borrower distribution of home refinance lending is poor.

The bank originated no HMDA home refinance loans to low-income borrowers in either evaluation period. The aggregate lenders originated 1.16 percent and 1.33 percent, respectively, of total HMDA loans during these evaluation periods. However, 10.96 percent and 12.44 percent of families reside in this AA are low-income borrowers.

For the evaluation period using 2000 U.S. Census data, the bank's 13.16 percent of home refinance lending to moderate-income borrowers is somewhat higher than the 10.38 percent of moderate-income families in the AA. The aggregate lenders originated 3.73 percent of loans to moderate-income borrowers. For the evaluation period using 2010 U.S. Census data, the bank's 3.19 percent of home refinance lending to moderate-income borrowers is lower than the 10.63 percent of moderate-income families in the AA. The aggregate lenders originated 3.81 percent of loans to moderate-income borrowers in this evaluation period.

### ***Small Loans to Businesses***

Refer to Table 11 in the New York-Wayne-White Plains, NY-NJ Multistate MD 35644 AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate when considering the strong competition from larger, nationwide lenders, and the distribution by size of loan.

For the evaluation period using 2000 U.S. Census data, the bank originated four small loans to businesses in the AA. Fifty percent of these were to small businesses (businesses with gross annual revenues of \$1 million or less); small businesses comprise 68.88 percent of all businesses in the AA. None of the bank's loans were for \$100,000 or less.

For the evaluation period using 2010 U.S. Census data, the bank originated 11 small loans to businesses in the AA. For this evaluation period, 36.36 percent of these were small loans to small businesses; small businesses comprise 73.14 percent of all businesses in this AA. For this period, 27.27 percent of the bank's loans were \$100,000 or less.

### **Community Development Lending**

Community development lending had a neutral impact on the lending test for the New York-Wayne-White Plains, NY-NJ Multistate MD 35644 AA. As indicated in Appendix D, Table 1, Lending Volume, Trustco made no qualified community development loans during the 2011 evaluation period and one qualified community development loan during the January 1, 2012 through June 30, 2013 evaluation period.

## **Product Innovation and Flexibility**

Product flexibility had a positive impact on the lending test conclusion for the NY-W-WP AA. Trustco offers the following specialized home mortgage loan and home improvement financing program:

- The Affordable Housing Program (AHP) is a flexible homebuyer program targeted to low- and moderate- income borrowers. In the past, this program provided up to 100 percent financing for low- and moderate- income homebuyers, with low closing costs and no PMI. Going forward, the product will only offer 95 percent financing; however, the associated transaction costs will remain low and the bank will continue to target low- and moderate-income borrowers. Since the last CRA exam, an aggregate of 261 Affordable Housing Program loans were made throughout all AAs.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in the NY-W-WP AA is rated Low Satisfactory. In addition to the target AA, the bank's performance under the Investment Test considers the investments that have a statewide and/or regional impact. Refer to Table 14 in the New York-Wayne-White Plains, NY-NJ Multistate MD section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Trustco has a adequate level of qualified investments and grants to meet the identified needs of the NY-W-WP AA. CRA-qualified investments, including grants, donations, and other charitable contributions, originated during the evaluation period totaled \$17,650 to seven different regional organizations. The grants, donations, and charitable contributions originated during the period include the following:

- In 2011 and 2012, the bank donated \$5,000 to the Habitat for Humanity of Bergen County, which builds affordable houses for low-income families in the AA.
- In 2011, the bank donated \$5,000 to Westchester Residential Opportunities, Inc., which is an affordable-housing organization that champions the expansion of non-discriminatory housing opportunities for low- and moderate-income individuals.
- In 2011 and 2012, the bank donated \$2,000 to The DACKKs Group for Supportive Housing Development, Inc., an affordable-housing organization in Bergen County, NJ. It is the group's mission to help the homeless make the transition to independent living through the help of dedicated volunteers and the financial support of government and foundation grants and other donors.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in the New York-Wayne-White Plains, NY-NJ Multistate MD 35644 AA is rated as Low Satisfactory.

### **Retail Banking Services**

Refer to Table 15 in the New York-Wayne-White Plains, NY-NJ Multistate MD section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Trustco's delivery systems are accessible to essentially all portions of the AA. Trustco operates 16 of its 135 branches in this AA. Of these sixteen branches, none were in a low-income geography, none were in a moderate-income geography, 4 were located in a middle-income geography, and 12 were located in an upper-income geography.

The distribution of branches in both low- and moderate-income geographies is lower than the percentage of the population residing in such geographies. As a percentage of the total number of branches, there are no branches in low-income geographies where 1.25 percent of the population resides based on 2000 U.S. Census data and 1.67 percent of the population resides based on 2010 U.S. Census data. With respect to moderate-income geographies, there were no branches where 4.45 percent of the population resides based on 2000 U.S. Census data and 6.68 percent of the population resides based on 2010 U.S. Census data.

Trustco's services do not vary in a way that inconveniences certain portions of the AA. Retail services are offered equally at every branch. Services consist of traditional retail products such checking, savings, and certificate of deposit accounts. Hours are uniform among all branches in this AA. Nine of the sixteen branches offer drive-up service and all branches offer 24-hour ATM access.

Trustco offers alternate delivery systems such as mobile banking and online banking. However, as there is no determination of the volume of use in low- and moderate- income geographies and by low- and moderate-income individuals, we placed no weight on these products and services.

### **Community Development Services (CD)**

Trustco's performance in providing community development services is adequate in the New York-Wayne-White Plains, NY-NJ MD 35644 AA.

Trustco provides an adequate level of CD services within the Rockland, Bergen and Westchester AA. Bank management and employees participated in organizations that promote housing, social, and economic development. These community development services are relatively responsive to community development needs in the AA. The following highlights the major services provided:

- An employee served as a volunteer at an organization that purchases properties and renovates them for low and moderate-income housing.
- An employee served as a volunteer in an organization that provided clothing and food for low- and moderate-income individuals.
- Several bank employees served as volunteers at a regional food bank.
- Several bank employees volunteered at an organization that delivers meals to low- and moderate-income individuals.

## State Rating

### State of New York

#### **CRA Rating for the State of State of New York<sup>2</sup>: Satisfactory**

**The lending test is rated: High Satisfactory**

**The investment test is rated: Low Satisfactory**

**The service test is rated: High Satisfactory**

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the community credit needs of its AAs;
- A substantial majority of home mortgage loans and small loans to businesses are originated within the bank's combined AAs;
- In both 2011 and 2012, Trustco was ranked sixth in HMDA home purchase lending and second in home refinance lending by total number and dollar amounts lent within these AAs;
- Trustco ranked 13<sup>th</sup> in home improvement lending in 2011 and 33<sup>rd</sup> in 2012 based on the total number and dollar amounts lent within these AAs;
- The geographic distribution of loans reflects good penetration throughout the AAs;
- The distribution of loans to borrowers reflects good distribution among retail customers of different income levels and business customers of different sizes;
- The bank made an adequate level of qualified community development investments, donations, and grants;
- Service delivery systems are readily accessible to individuals of different income levels in the AA and Trustco provides an adequate level of community development services;

#### **Description of Institution's Operations in New York**

Trustco currently has five AAs within the State of New York. They include the Albany-Schenectady-Troy MSA 10580 AA, Glens Falls MSA 24020 AA, Kingston MSA 28740 AA, Poughkeepsie-Newburgh-Middletown MSA 39100 AA, and Columbia County and Green County, non-MSA AA. The bank opened three branches in 2011; one in the Kingston MSA 28740 AA opened January 18, 2011, and two in the Albany-Schenectady-Troy MSA 10580 AA opened June 22, 2011 and December 19, 2011.

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<sup>2</sup>For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

As of June 30, 2013, Trustco has 86 branches within the State of New York. Trustco has 70 branch offices in the five AAs of the New York state evaluation, we are excluding all activity at the 14 New York branch offices located in the New York-Wayne-White Plains MD 35644 AA, which was addressed in the previous section. Approximately 72 percent of the bank's total deposits are within the five AAs in the State of New York. Based on the June 30, 2012 FDIC Summary of Deposits data, Trustco ranked 32<sup>nd</sup> out of 236 institutions with a 0.30 percent deposit market share. The bank's primary competitors are JP Morgan Chase, NA, The Bank of New York Mellon, and other regional competitors including KeyBank, NA, and First Niagara Bank, NA.

For the evaluation period using 2000 U.S. Census data, Trustco originated 64 percent of its total HMDA and 96 percent of its total small business loan volume within the State of New York. For the evaluation period using 2010 U.S. Census data, the bank originated 76 percent of its total HMDA and 95 percent of its total small business loan volume within the State of New York.

Refer to the market profiles for the State of New York in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in New York**

The State of New York rating is based primarily on the AA that received a full-scope review. We conducted a full-scope reviews of the Albany-Schenectady-Troy MSA 10580 AA because a majority of the bank's branches, deposits, and loan originations within the State of New York were in this AA.

#### **Albany-Schenectady-Troy, NY MSA 10580**

We conducted a full-scope review of the Albany-Schenectady-Troy MSA 10580. Trustco has 55 branches in this AA. In the state of NY, approximately 88 percent of the bank's deposits, 69 percent of the bank's home mortgage lending, and 87 percent of the bank's small loans to businesses were originated in this AA. Approximately, 94 percent of the loans originated in this AA from January 1, 2011 through June 30, 2013 were home mortgage loans, with small loans to businesses accounting for the remaining 6 percent.

#### **Glens Falls, NY MSA 24020 (Warren and Washington County)**

We conducted a limited-scope review of the Glens Falls, NY MSA 24020 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has five branches in this AA. In the State of NY, approximately 4.5 percent of the bank's deposits, 7.5 percent of the bank's home mortgage lending, and approximately 4.3 percent of the bank's small loans to businesses were originated in this AA.

#### **Kingston, NY MSA 28740 (Ulster County)**

We conducted a limited-scope review of the Kingston, NY MSA 28740 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has two branches in this AA. In the State of NY, approximately 0.35 percent of the bank's deposits, 0.6 percent of the bank's home mortgage lending, and no small loans to businesses were originated in this AA.

**Poughkeepsie-Newburgh-Middletown, NY MSA 39100 (Orange, Dutchess)**

We conducted a limited-scope review of the Poughkeepsie-Newburgh-Middletown, NY MSA 39100 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has five branches in this AA. In the State of NY, approximately 3.1 percent of the bank's deposits, 2.4 percent of the bank's home mortgage lending, and approximately 0.6 percent of the bank's small loans to businesses were originated in this AA.

**Columbia and Greene County, Non-MSA**

We conducted a limited-scope review of this AA because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has five branches in this AA. In the State of NY, approximately 4.2 percent of the bank's deposits, 2.9 percent of the bank's home mortgage lending, and approximately 2.5 percent of the bank's small loans to businesses were originated in this AA.

**Community Contact**

We utilized recent community contact information extracted from the OCC Community Contact data base during this evaluation to identify community development needs and opportunities within the Albany-Schenectady-Troy, NY MSA 10580 AA. Refer to the Market Profile section in Appendix C for details.

**LENDING TEST**

**Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in the State of New York is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Albany-Schenectady-Troy, NY MSA 10580 AA is good.

**Lending Activity**

Overall, Trustco's lending activity in the State of New York was High Satisfactory, as the bank's lending levels reflect good responsiveness to the credit needs of the community.

Refer to Table 1. Lending Volume in the State of New York section of Appendix D for the facts and data used to evaluate the bank's lending activity.

**Albany-Schenectady-Troy, NY MSA 10580**

Trustco's lending activity in the Albany-Schenectady-Troy, NY MSA 10580 is High Satisfactory and the bank's lending levels reflect good responsiveness to the credit needs of the community.

Trustco has 55 branches in this AA and approximately 63.5 percent of the bank's total deposits were in this AA, as of June 30, 2012. According to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco had an 11.87 percent deposit market share in the Albany-Schenectady-Troy, NY MSA 10580, ranking it second among 25 FDIC-insured institutions. The MSA deposit market is highly concentrated with four institutions, including Trustco, holding 65 percent of the AA's deposit market share. Major competitors are KeyBank, NA (ranked first with a 34.13 percent market share), First Niagara Bank, NA (ranked third with a 10.36 percent market share), and RBS Citizens, NA (ranked fourth with a 9.59 percent market share).

The 2011 Peer Mortgage Data indicates Trustco ranked third out of 264 mortgage lenders in the AA with a market share of 8.27 percent by loan count and 8.26 percent by total dollar amount. In 2012, Trustco ranked second out of 452 mortgage lenders in the AA with a market share of 6.98 percent by loan count and 6.24 percent by dollar amount. These rankings are a good indicator of the bank's achievement in granting a high volume of HMDA loans in the area. Although the bank's market share in HMDA home mortgage lending is below the bank's deposit market share in this AA, Trustco's performance is good when considering the competition from larger regional and nationwide mortgage lenders. Wells Fargo Bank, NA and SEFCU Services, LLC, a regional Federal Credit Union, have the first and second largest home mortgage lending market share in the AA. Further, Trustco outperforms KeyBank, NA and First Niagara Bank, NA in home mortgage lending. These two institutions are the bank's largest competitors in terms of deposit market share.

Based on the 2011 Peer Small Business Data, Trustco ranked 24<sup>th</sup> out of 87 lenders in the AA with a market share of 0.49 percent. In 2012, Trustco ranked 19<sup>th</sup> out of 53 lenders in the AA with a market share of 0.98 percent. This performance is adequate.

For the evaluation period using 2000 U.S. Census data, Trustco originated approximately 4.84 percent of all home mortgage loans and 0.49 of all small loans to businesses in this AA. In the State of New York, 84.27 percent of total rated area loans were originated in this AA. Of the total loans originated in this AA, 93 percent were home mortgage loans and 7 percent were small loans to businesses. Among HMDA home mortgage originations in this AA, 36 percent were home purchase loans, 2.7 percent were home improvement loans, 60.7 percent were home refinance loans, and less than one percent were multifamily loans.

For the evaluation period using 2010 U.S. Census data, in the State of New York, 83.7 percent of total rated area loans were originated in this AA. Of the total loans originated in this AA, 95 percent were HMDA home mortgage loans and 5 percent were small loans to businesses. Among HMDA home mortgage originations in this AA, 19 percent were home purchase loans, 0.8 percent were home improvement loans, 80 percent were home refinance loans, and 0.2 percent were multifamily loans.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans reflects good penetration throughout the full-scope AA. The overall geographic distribution of HMDA home mortgage loans is good. The overall geographic distribution of small loans to businesses is good.

#### **Albany-Schenectady-Troy, NY MSA 10580**

The overall geographic distribution of loans reflects good penetration throughout the AA. The geographic distribution of home mortgage loans is good, and the geographic distribution of small loans to businesses is good.

Based on 2011 Peer Mortgage data, Trustco ranked third out of 100 lenders with a 6.67 percent market share of HMDA loans in low-income geographies. Additionally, Trustco ranked third out of 186 lenders with a 4.96 percent market share of HMDA loans in moderate-income geographies. These high rankings reflect the bank's responsiveness to the credit needs of the low- and moderate-income geographies.

***Home Mortgage Loans***

Refer to Tables 2, 3, and 4 in the State of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

***Home Purchase Lending***

The geographic distribution of home purchase lending is good.

For the evaluation period using 2000 U.S. Census data, the bank originated 2.55 percent and 11.03 percent of the total HMDA home purchase loans to borrowers in low- and moderate- income geographies, respectively. In that evaluation period, the aggregate lenders originated 2.37 percent and 11.15 percent of total HMDA loans in low- and moderate-income areas. The percentage of home purchase lending in low-income geographies was near the percentage of owner-occupied housing units in these geographies.

For the evaluation period using 2010 U.S. Census data, the bank originated 5.76 percent and 9.79 percent of the total HMDA home purchase loans to borrowers in low- and moderate- income geographies, respectively. In that evaluation period, the aggregate lenders originated 3.08 percent and 9.88 percent of total HMDA loans in low- and moderate-income areas. In this evaluation period, the percentage of home purchase lending in low-income geographies exceeds the percentage of owner-occupied housing units in these geographies of 4.37 percent.

For both evaluation periods, the percentage of home purchase lending in moderate-income geographies is slightly lower than the percentage of owner-occupied housing units in these geographies of 13.35 percent and 11.32 percent, respectively.

***Home Improvement Lending***

A very small portion of the bank's home mortgage lending in this AA is in home improvement loans. The geographic distribution of home improvement lending is adequate.

For the evaluation period using 2000 U.S. Census data, the bank originated 1.85 percent and 5.56 percent of the total HMDA home improvement loans to borrowers in low- and moderate-income geographies, respectively. In that evaluation period, the aggregate lenders originated 2.21 percent and 13.62 percent of total HMDA home improvement loans in low- and moderate-income areas, respectively.

For the evaluation period using 2010 U.S. Census data, the bank originated no HMDA loans in low-income geographies compared to the aggregate lenders of 2.25 percent. In this evaluation period, the bank originated 14.71 percent in HMDA loans to moderate-income borrowers compared to the aggregate lenders 11.47 percent.

For the evaluation period using the 2000 U.S. Census data, the percentage of home improvement lending in low-income geographies is slightly lower than the 2.78 percent of owner-occupied housing units in these geographies. For the evaluation period using the 2010 U.S. Census data, the bank made no HMDA home improvement loans in low-income geographies compared to low-income geographies totaling 4.37 percent in the AA. For the evaluation period using the 2000 U.S. Census data, the percentage of HMDA home improvement lending in moderate-income geographies is lower than the 13.35 percent of owner-occupied housing units in these geographies. For the evaluation period using

2010 U.S. Census data, the percentage of HMDA home improvement lending in moderate-income geographies is higher than the 11.32 percent of owner-occupied housing units in these geographies.

### ***Home Refinance Lending***

The geographic distribution of home refinance lending is good.

For the evaluation period using 2000 U.S. Census data, the bank originated 1.94 percent and 6.49 percent of the total HMDA home refinance loans to borrowers in low- and moderate-income geographies, respectively. In that evaluation period, the aggregate lenders originated 1.37 percent and 8.10 percent of total HMDA home refinance loans in low- and moderate-income areas, respectively.

For the evaluation period using 2010 U.S. Census data, the bank originated 2.22 percent and 6.95 percent of the total HMDA home refinance loans to borrowers in low- and moderate-income geographies, respectively. In this evaluation period, the aggregate lenders originated 1.77 percent and 6.92 percent of total HMDA home refinance loans in low- and moderate-income areas, respectively.

For both evaluation periods, the percentage of HMDA home refinance lending in low-income geographies is slightly lower than the percentage of owner-occupied housing units in low-income geographies. The percentage of HMDA home refinance lending in moderate-income geographies is lower than the percentage of owner-occupied housing units in moderate-income geographies.

### ***Small Loans to Businesses***

Refer to Table 6 in the State of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good.

In the evaluation period using 2000 U.S. Census data, the bank originated 12.77 percent and 12.77 percent of its small loans to businesses in low- and moderate-income geographies, respectively. In both cases, these figures exceed the proportion of small businesses in these geographies. The bank's proportion of lending to small business in low-income geographies significantly exceeds the aggregate lenders in these geographies of 7.90 percent. The bank's proportion of lending to moderate-income geographies approximates the aggregate lenders proportion of 12.19 percent.

In the 2010 U.S. Census data evaluation period, the bank originated 11.85 percent and 13.27 percent of its small loans to businesses in low- and moderate-income geographies, respectively. For low-income geographies, the bank's performance significantly exceeds the proportion of small businesses. In this evaluation period, the aggregate lenders originated 7.18 percent and 13.15 percent of their small loans to businesses in low- and moderate-income geographies, respectively.

### ***Lending Gap Analysis***

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in Trustco's lending patterns.

### ***Inside/Outside Ratio***

Trustco originated a substantial majority of its loans in its combined AAs during both evaluation periods. During the combined evaluation period, 92 percent of the total number of loans and 92 percent of the total dollar amount of HMDA reportable loans were originated in the combined AAs. This

performance positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

### **Distribution of Loans by Income Level of the Borrower**

The overall distribution of loans to borrowers reflects good distribution among retail customers of different income levels and business customers of different size. The overall distribution of HMDA home mortgage loans to borrowers of different income levels is good. The overall distribution of loans to businesses of different sizes is adequate.

#### **Albany-Schenectady-Troy, NY MSA 10580 AA**

The overall distribution of loans to borrowers of different income levels and businesses of different sizes in this AA reflects good distribution. Within this full-scope AA, Trustco's distribution of HMDA home mortgage loans by borrower income level is good and Trustco's distribution of small loans to small businesses is adequate.

Based on 2011 Peer Mortgage data, Trustco ranked fourth out of 159 lenders with a 5.83 percent market share of HMDA loans to low-income borrowers. Additionally, Trustco ranked fourth out of 227 lenders with a 5.56 percent market share of HMDA loans to moderate-income borrowers. These high rankings reflect the bank's responsiveness to the credit needs of low- and moderate-income borrowers.

#### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### ***Home Purchase Lending***

The borrower distribution for home purchase lending is good.

In the evaluation period using 2000 U.S. Census data, the bank originated 8.75 percent and 22.96 percent of HMDA home purchase loans to low- and moderate-income borrowers, respectively. In that evaluation period, the aggregate lenders originated 9.46 percent and 28.58 percent of HMDA home purchase loans to low- and moderate-income borrowers, respectively.

In the evaluation period using 2010 U.S. Census data, the bank originated 9.73 percent and 21.51 percent of HMDA home purchase loans to low- and moderate-income borrowers, respectively. In this evaluation period, the aggregate lenders originated 10.68 percent and 27.70 percent of HMDA home purchase loans to low- and moderate-income borrowers, respectively.

For both evaluation periods, the percentage of home purchase lending to low-income borrowers is slightly lower than the percentage of low-income families in the AA. For both evaluation periods, the percentage of home purchase lending to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

#### ***Home Improvement Lending***

Trustco had a limited volume of home improvement lending in the evaluation period. The borrower distribution for home improvement lending is good.

In the evaluation period using 2000 U.S. Census data, the bank originated 11.11 percent and 29.63 percent of HMDA home improvement loans to low- and moderate-income borrowers, respectively. In

that evaluation period, the aggregate lenders originated 10.73 percent and 25.23 percent of HMDA home improvement loans to low- and moderate-income borrowers, respectively.

In the evaluation period using 2010 U.S. Census data, the bank originated 17.65 percent and 14.71 percent of HMDA home improvement loans to low- and moderate-income borrowers, respectively. In this evaluation period, the aggregate lenders originated 11.57 percent and 22.31 percent of HMDA home improvement loans to low- and moderate-income borrowers, respectively.

For the evaluation period using 2000 U.S. Census data, the percentage of home improvement lending to low-income borrowers is lower than the percentage of low-income families in the AA. For the evaluation period using 2010 U.S. Census data, the percentage of home improvement lending to low-income borrowers is slightly lower than the 20.53 percent of low-income families in the AA.

For the evaluation period using 2000 U.S. Census data, the percentage of home improvement lending to moderate-income borrowers significantly exceeds the 18.71 percent of moderate-income families in the AA. For the evaluation period using 2010 U.S. Census data, the percentage of home improvement lending to moderate-income borrowers is lower than the percentage of moderate-income families in the AA.

### ***Home Refinance Lending***

The borrower distribution for home refinance lending is good.

In the evaluation period using 2000 U.S. Census data, the bank originated 6.17 percent and 21.10 percent of HMDA home refinance loans to low- and moderate-income borrowers, respectively. In that evaluation period, the aggregate lenders originated 6.42 percent and 20.28 percent of HMDA home refinance loans to low- and moderate-income borrowers, respectively.

In the evaluation period using 2010 U.S. Census data, the bank originated 6.26 percent and 19.23 percent of HMDA home refinance loans to low- and moderate-income borrowers, respectively. In that evaluation period, the aggregate lenders originated 6.20 percent and 19.06 percent of HMDA home refinance loans to low- and moderate-income borrowers, respectively.

For both evaluation periods, the percentage of home refinance lending to low-income borrowers is significantly lower than the percentage of low-income families in the AA. For both evaluation periods, the percentage of home refinance lending to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

### ***Small Loans to Businesses***

Refer to Table 11 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Small loans to businesses make up a minor portion of the bank's lending activity in this AA. Small loans to businesses accounted for 6.7 percent of lending activity in the AA in the evaluation period using 2000 U.S. Census data and 5 percent of lending activity in the evaluation period using 2010 U.S. Census data.

The borrower distribution of small loans to businesses is adequate. For both evaluation periods, the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) is lower than the percentage of small businesses in the AA.

The distribution by size of loans shows that approximately 40 percent of the loan originations in the evaluation period using 2000 U.S. Census data are for \$100,000 or less. In the evaluation period using 2010 U.S. Census data, this percentage is approximately the same, indicating that Trustco is lending to small businesses.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the State of New York lending section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

### **Albany-Schenectady-Troy, NY MSA 10580 AA**

Community development lending had a positive impact on the lending test for the Albany-Schenectady-Troy, NY MSA 10580 AA. Trustco originated several loans during the evaluation period that were responsive to the needs of the AA. During the evaluation period, Trustco originated 15 qualified community development loans totaling \$2.42 million in this AA. This AA had the greatest amount of community development loans.

- Throughout the evaluation period, Trustco originated 11 loans totaling \$2.02 million to provide affordable housing for low-and moderate-income families in low- and moderate-income census tracts.
- In 2013, the bank provided a \$100,000 credit line to the Regional Food Bank of NE New York, a not-for-profit organization operating a food pantry in the region.
- In 2011, Trustco originated two loans totaling \$225,757 for mixed-use buildings that helped to revitalize or stabilize low-and moderate-income geographies.
- In 2011, the bank approved a \$75,000 credit line to a business located in a low- or moderate-income geography, helping to revitalize and stabilize the area.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a positive impact on the lending test conclusion for the state of New York. Trustco uses innovative and flexible lending practices in order to serve AA credit needs.

### **Albany-Schenectady-Troy, NY MSA 10580**

Product innovation and flexibility had a positive impact on the lending test conclusion for the Albany-Schenectady-Troy MSA 10580. Trustco offers the following specialized home mortgage loan and home improvement financing program:

- The Affordable Housing Program (AHP) is a flexible homebuyer program targeted to low- and moderate- income borrowers. This loan program provides up to 100 percent financing for low- and moderate- income homebuyers. Trustco has since discontinued this program and has

replaced it with a program for 95 percent financing. The program has low closing costs and no private mortgage insurance requirement. Since the last CRA exam, an aggregate of 261 Affordable Housing Program loans were made throughout all AAs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on the limited-scope review, the bank's performance under the lending test in the Columbia and Greene County, NY non-MSA is consistent with the bank's State of New York High Satisfactory lending test rating. For the Columbia and Greene County, NY non-MSA, Trustco's geographic distribution for HMDA home mortgage loans was excellent and borrower distribution was adequate. Trustco did not originate enough small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was good. Lending in this AA accounted for approximately four percent of the lending in the state of New York.

Based on the limited-scope review, the bank's performance under the lending test in the Poughkeepsie-Newburgh-Middletown, NY MSA 39100 AA is consistent with the bank's State of New York High Satisfactory lending test rating. For the Poughkeepsie-Newburgh-Middletown, NY MSA 39100, Trustco's geographic distribution for HMDA home mortgage loans was excellent and the borrower distribution was adequate. Trustco did not originate enough small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was good. Lending in this AA accounted for approximately three percent of the lending in the state of New York.

Based on the limited-scope reviews, the bank's performance under the lending test in the Glens Falls, NY MSA 24020 MSA is lower than the bank's State of New York High Satisfactory lending test rating. For the Glens Falls, NY MSA 24020 AA, Trustco's geographic distribution for HMDA home mortgage loans was adequate but the borrower distribution was poor. Trustco did not originate enough small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was adequate. The weaker performance had minimal impact on the overall lending rating. Lending in this AA accounted for approximately eight percent of the lending in the state of New York.

Based on the limited-scope review, the bank's performance under the lending test in the Kingston, NY MSA 28740 AA is lower than the bank's State of New York High Satisfactory lending test rating. For the Kingston, NY MSA 28740 AA, Trustco's geographic distribution for HMDA home mortgage loans was poor and the borrower distribution was poor. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was poor. The weaker performance had minimal impact on the overall lending rating. Lending in this AA accounted for less than one percent of the lending in the state of New York.

Refer to the Tables 1 through 13 in the state of New York section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in New York is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Albany-Schenectady-Troy, NY MSA 10580 AA is

adequate. The bank's performance under the Investment Test also considers the investments that have a statewide and/or regional impact to include the bank's AAs.

Refer to Table 14 in the state of New York section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Albany-Schenectady-Troy, NY MSA 10580 AA**

Trustco has a adequate level of qualified investments and grants and exhibits adequate responsiveness to meeting the identified needs of the Albany-Schenectady-Troy, NY MSA 10580 AA. CRA-qualified investments, including grants, donations, and other charitable contributions, originated during the evaluation period total \$543 thousand to 75 different regional organizations. The grants, donations, and charitable contributions originated during the period include the following:

- Throughout the evaluation period, the bank donated a total of \$56 thousand to the Regional Food Bank of Northeastern, NY. The Food Bank is located in the bank's AA and it collects and distributes food to low- and moderate-income families in 11 counties in Upstate New York.
- Throughout the evaluation period, the bank donated a total of \$23,600 to the Capital District Loan Fund, which promotes economic growth in low- and moderate-income tracts by financing aspiring small business owners whose businesses are located in these areas.
- Throughout the evaluation period, Trustco donated a total of \$15,100 to Better Neighborhoods, Inc., which is located in Schenectady and provides programs to provide safe, affordable housing for personas with limited resources. The organization aims to promote homeownership and pride within the neighborhoods it serves.
- In 2011, Trustco donated \$12,000 to Rensselaer County Housing Resources, which is a non-profit organization. The bank donated to the Division of Housing and Community Renewal, which is responsible for the supervision, maintenance, and development of affordable low- and moderate-income housing in New York State. The Division performs a number of activities to the community, including Housing Operations and Community Development and Rent Administration.
- In 2011 and 2012, the bank donated \$9,000 to the Albany County Rural Housing Alliance, Inc., which is an affordable housing organization that preserves housing, assists first-time homebuyers, and counsels those in need of credit repair, foreclosure intervention, and reverse mortgages.

### **Statewide/Regional Investments**

During the evaluation period, Trustco donated a total of \$213 thousand to major expansion projects at Albany Medical Center. These projects are part of hospital revitalization efforts that will benefit regional residents and the bank's AA. Throughout the evaluation period, the bank also donated \$21,000 to The Albany Academies to support the financial aid program and scholarship fund. Over 40 percent of the students enrolled at The Albany Academies receive tuition assistance based on family income, assets, indebtedness, etc.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the limited-scope AAs was weaker than the bank's overall performance in the state as a result of fewer investments, grants, and donations in these AAs. The weaker performance had little impact on the overall investment test rating.

Refer to Table 14 in the State of New York section of Appendix D for the facts and data to support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in the State of New York is rated as High Satisfactory. Based on full-scope reviews, the bank's performance in the Albany-Schenectady-Troy, NY MSA 10580 AA is High Satisfactory.

### **Retail Banking Services**

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### **Albany-Schenectady-Troy, NY MSA 10580**

Trustco's delivery systems are accessible to essentially all geographies and individuals of different income levels in this AA. Trustco operates 55 of its 135 branches in this AA. Of these 55 branches, 5 were in a low-income geography, 5 were in a moderate-income geography, 29 were located in a middle-income geography, and 16 were located in an upper-income geography.

As a percentage of the total number of branches, 9 percent of the bank's branches are in low-income geographies where 9.63 percent of the population resides. With respect to moderate-income geographies, 9 percent of the bank's branches are where 14.16 percent of the population resides. The bank's branch network is accessible to essentially all portions of the AA.

Trustco's services do not vary in a way that inconveniences certain portions of the AA. Retail services are offered equally at every branch. Services consist of traditional retail products such checking, savings, and Certificate of Deposit accounts. Hours are uniform among all branches in this AA. Thirty-nine of the fifty-five branches offer drive-up service and fifty-three branches offer 24-hour ATM access.

During the evaluation period, Trustco opened two new branches in this AA. One branch is located in a middle-income geography and the other is located in an upper-income geography.

Trustco offers alternate delivery systems such as mobile banking and online banking. However, as there is no determination of the volume of use in low- and moderate- income geographies and by low- and moderate-income individuals, we placed no weight on these products and services.

## **Community Development Services (CD)**

Trustco's performance in providing community development services is Low Satisfactory in the Albany-Schenectady-Troy, NY MSA 10580 AA.

### **Albany-Schenectady-Troy, NY MSA 10580 AA**

Trustco provides an adequate level of community development services within the Albany-Schenectady-Troy, NY MSA 10580 AA. CD services are responsive to the community development needs in the area. The following details the community development services that occurred during the evaluation period:

- The bank's CRA Officer serves on the Board of Directors of the Albany Affordable Housing Partnership, a non-profit organization that provides counseling services to low- and moderate-income homeowners. This organization also acquires and rehabilitates housing in low- and moderate-income neighborhoods and sells them with favorable financing terms to low- and moderate-income borrowers.
- A bank officer serves on the Board of Directors of the Boys & Girls Club of Schenectady, NY, which is an organization that provides programs to local youths that promote leadership skills and responsibility. The organization has a special concern for children of disadvantaged circumstances.
- A bank employee offers financial expertise while serving as the Treasurer of a local cooperative whose mission is to promote youth development in a low- or moderate-income community.
- A bank employee is a Committee Member at Northeast Regional Food Bank, which collects food from the food industry and helps feed low- and moderate-income individuals in the community.
- A bank employee serves as a Board Member at Safe, Inc., which is a regional organization that provides local low- and moderate-income residents with basic needs and services, such as shelter and clothing.
- A bank officer offers financial expertise while serving as the Treasurer of the Schenectady Foundation, whose mission is to raise money for grants and scholarships that specifically meet the needs of the community, including low- and moderate-income individuals and families.
- A bank employee offers financial expertise while serving on the Board and Finance Committee of the Schenectady YMCA. The YMCA is a cause-drive organization advocating youth development, healthy living, and social responsibility for children of all ages but specifically children from disadvantaged backgrounds.
- Additionally, various bank employees served approximately 1,600 hours at qualified community development organizations throughout the examination period.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Glens Falls, NY MSA 24020 AA, Kingston, NY MSA 28740 AA, and Poughkeepsie-Newburgh-Middletown, NY MSA 39100 AA, and the Columbia and Greene County, Non-MSA AA is weaker than the bank's overall High Satisfactory performance under the Service Test in the State of New York. Trustco's performance in the limited-scope AAs is based on the distribution of branches by income level as well as community development activities. The weaker performance in these AAs had limited-impact on the overall service test rating.

Refer to Table 15 in the State of New York section of Appendix D for the facts and data used to support these conclusions.

## **State Rating**

### **State of Florida**

#### **CRA Rating for the State of State of Florida: Satisfactory**

**The lending test is rated: Low Satisfactory**

**The investment test is rated: Low Satisfactory**

**The service test is rated: Low Satisfactory**

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to the community credit needs of its AAs;
- A substantial majority of home mortgage loans and small loans to businesses are originated within the bank's combined AAs;
- Trustco was ranked 53rd in HMDA home purchase lending, 44<sup>th</sup> in home improvement lending, and 53rd in home refinance lending by total number of loans in 2011;
- The geographic distribution of loans reflects adequate penetration throughout the AAs;
- The distribution of loans to borrowers reflects good distribution among retail customers of different income levels and business customers of different sizes;
- The bank made an adequate amount of qualified community development investments, donations, and grants.
- Service delivery systems are reasonably accessible to individuals of different income levels in the AA and Trustco provides adequate community development services.

#### **Description of Institution's Operations in Florida**

Trustco currently has eight AAs within the State of Florida. They include the Orlando-Kissimmee-Sanford County MSA 36740 AA, Volusia MSA 19660 AA, Polk MSA 29460 AA, Manatee-Sarasota MSA 35840 AA, Brevard MSA 37340 AA, Charlotte MSA 39460 AA, Hillsborough MSA 45300 AA, and Palm Beach MSA 48424 AA. The bank opened seven branches since 2010, four of which were located in Florida. Florida had branch one in the Orlando-Kissimmee-Sanford MSA 36740 AA opened March 8, 2010, one in the Hillsborough MSA 45300 AA opened January 5, 2010, one in the Palm Beach MSA 48424 AA opened January 17, 2012, and one in Brevard MSA 37340 AA opened August 13, 2012.

As of June 30, 2013, Trustco has 45 branches within the State of Florida. Approximately 17 percent of the bank's total deposits are within the seven AAs in the State of Florida. Based on the June 30, 2012 FDIC Summary of Deposits data, Trustco ranked 56<sup>th</sup> out of 292 institutions with a 0.16 percent deposit market share. The bank's primary competitors are Bank of America, Wells Fargo, and other regional competitors including Regions Bank and EverBank.

For the evaluation period using 2000 U.S. Census data, Trustco originated 22 percent of its total HMDA loans and 2.5 percent of the small business loan volume within the State of Florida. For the evaluation period using 2010 U.S. Census data, the bank originated 20 percent of its total HMDA and had no small business loans within the State of Florida.

Refer to the market profiles for the State of Florida in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### **Scope of Evaluation in Florida (FL)**

The State of Florida rating is based partially on the Orlando-Kissimmee-Sanford MSA 36740 AA, which received a full-scope review. We selected this AA for a full-scope review because the majority of the bank's Florida branches, deposits, and loan originations are within this AA. The remaining AA's received a limited scope review; in aggregate these AAs accounted for approximately 39.3 percent of the bank's lending in the State of Florida in the 2011 evaluation period and 42.5 percent of the bank's lending in the State of Florida in the 2012 through June 30, 2013 evaluation period. The State of Florida rating is also based partially on these limited scope reviews.

#### **Orlando-Kissimmee-Sanford, FL MSA 36740**

Trustco has 32 branches in this AA. In the State of Florida, approximately 56.8 percent of the bank's deposits, 8 percent of the bank's HMDA home mortgage lending, and 2 percent of the bank's small loans to businesses were originated in this AA. Approximately 99 percent of the loans originated in this AA from January 1, 2011 through June 30, 2013 were home mortgage loans, with small loans to businesses accounting for the remaining 1 percent.

#### **Volusia, FL MSA 19660**

We conducted a limited-scope review of the Volusia, Florida MSA 19660 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has two branches in this AA. In the State of Florida, approximately 7.2 percent of the bank's deposits, 1.5 percent of the bank's HMDA home mortgage lending, and approximately 0.6 percent of the bank's small loans to businesses were originated in this AA.

#### **Polk, FL MSA 29460**

We conducted a limited-scope review of the Polk, Florida MSA 29460 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has two branches in this AA. In the State of Florida, approximately 1.95 percent of the bank's deposits, 0.5 percent of the bank's HMDA home mortgage lending, and no small loans to businesses were originated in this AA.

#### **Manatee-Sarasota, FL MSA 35840**

We conducted a limited-scope review of the Manatee-Sarasota, Florida MSA 35840 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has four branches

in this AA. In the State of Florida, approximately 25 percent of the bank's deposits, 1.7 percent of the bank's HMDA home mortgage lending, and no small loans to businesses were originated in this AA.

**Brevard, FL MSA 37340**

We conducted a limited-scope review of the Brevard, Florida MSA 37340 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco only has one branch in this AA and the branch was built August 13, 2012.

**Charlotte, FL MSA 39460**

We conducted a limited-scope review of the Charlotte, Florida MSA 39460 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has one branch in this AA. In the State of Florida, approximately 3 percent of the bank's deposits, 0.4 percent of the bank's HMDA home mortgage lending, and no small loans to businesses were originated in this AA.

**Hillsborough, FL MSA 45300**

We conducted a limited-scope review of the Hillsborough, Florida MSA 45300 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has two branches in this AA. In the State of Florida, approximately 5.6 percent of the bank's deposits, 1.2 percent of the bank's HMDA home mortgage lending, and no small loans to businesses were originated in this AA.

**Palm Beach, FL MSA 48424**

We conducted a limited-scope review of the Palm Beach, Florida MSA 48424 because of the bank's limited presence and limited deposit and lending activity in this AA. Trustco has five branches in this AA. In the State of Florida, approximately 0.54 percent of the bank's deposits and no loans originated in this AA.

**Community Contact**

We utilized recent community contact information extracted from the OCC Community Contact data base during this evaluation to identify community development needs and opportunities within the Lake-Orange, FL MSA 36740 AA. Refer to the Market Profile section in Appendix C for details.

**LENDING TEST**

**Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in the State of Florida is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Orlando-Kissimmee-Sanford, FL MSA 36740 AA is Low Satisfactory.

**Lending Activity**

Overall, Trustco's lending activity was Low Satisfactory, and the bank's lending levels reflect adequate responsiveness to the credit needs of the community.

Refer to Table 1. Lending Volume in the State of Florida section of Appendix D for the facts and data used to evaluate the bank's lending activity.

**Orlando-Kissimmee-Sanford, FL MSA 36740**

Trustco's lending activity in the Orlando-Kissimmee-Sanford, FL MSA 36740 is Low Satisfactory and the bank's lending levels reflect adequate responsiveness to the credit needs of the community.

Trustco has 32 branches in this AA and approximately 6.4 percent of the bank's total deposits were in this AA, as of June 30, 2012. According to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco had a 1.06 percent deposit market share in the Orlando-Kissimmee-Sanford, FL MSA 36740, ranking it 15th among 49 FDIC-insured institutions. The MSA deposit market is highly concentrated with three institutions, holding 58 percent of the AA's deposit market share. Major competitors are SunTrust Bank, NA (ranked first with a 22.57 percent market share), Bank of America, NA (ranked second with a 18.89 percent market share), and Wells Fargo Bank, NA (ranked third with a 17.09 percent market share).

The 2011 Peer Mortgage data indicates Trustco is ranked 52nd out of mortgage lenders in the AA with a market share of 0.30 percent by loan count and 0.25 percent by total dollar amount. In 2012, Trustco ranked 35<sup>th</sup> out of 1,275 mortgage lenders with a market share of 0.47 percent by loan count and 0.39 percent based on dollar volume. These rankings are a good indicator of the bank's volume of HMDA loans in the area. Although the bank's market share in home mortgage lending is below the bank's deposit market share in this AA, Trustco's lending levels are adequate when considering the competition from larger regional and nationwide mortgage lenders. Wells Fargo Bank, NA and Bank of America, have the first and second largest home mortgage lending market share in the AA.

Based on the 2011 Peer Small Business Data, Trustco ranked 95<sup>th</sup> out of 216 lenders in the AA with a market share of 0.01 percent. This performance needs improvement.

For the evaluation period using 2000 U.S. Census data, Trustco originated approximately 0.30 percent of all HMDA home mortgage loans and 0.01 of all small loans to businesses in this AA. In the State of Florida, 60.7 percent of total rated area loans were originated in this AA. Of the total loans originated in this AA, 98.8 percent were HMDA home mortgage loans and 1.2 percent were small loans to businesses. Among HMDA home mortgage originations in this AA, 68 percent were home purchase loans, 2.1 percent were home improvement loans, and 29.8 percent were home refinance loans. There were multifamily loans.

For the evaluation period using 2010 U.S. Census data, in the State of Florida 57.45 percent of total rated area loans were originated in this AA. Of the total loans originated in this AA, 100 percent were HMDA home mortgage loans. There were no small loans to businesses. Among HMDA home mortgage originations in this AA, 48.7 percent were home purchase loans, 1.7 percent were home improvement loans, 49.6 percent were home refinance loans, and 0.2 percent were multifamily loans.

**Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans reflects adequate penetration throughout the full-scope AA. The overall geographic distribution of HMDA home mortgage loans is adequate. The overall geographic distribution of small loans to businesses is adequate.

**Orlando-Kissimmee-Sanford, FL MSA 36740**

The overall geographic distribution of loans reflects adequate penetration throughout the AA. The geographic distribution of HMDA home mortgage loans is adequate, and the geographic distribution of small loans to businesses is adequate.

Based on 2011 Peer Mortgage data, Trustco does not have a percent market share of HMDA loans in low-income geographies in Florida. Additionally, Trustco ranked 63rd out of 466 lenders with a 0.19 percent market share of HMDA loans in moderate-income geographies. These rankings reflect the bank's moderate presence in the State of Florida.

***Home Mortgage Loans***

Refer to Tables 2, 3, and 4 in the State of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's HMDA home mortgage loan originations/purchases.

***Home Purchase Lending***

The geographic distribution of HMDA home purchase lending is good.

For the evaluation period using 2000 U.S. Census data, the bank originated no HMDA home purchase loans to borrowers in low-income geographies and originated 11.73 percent of its HMDA home purchase loans in the moderate-income geography. In that evaluation period, the aggregate lenders originated 0.12 percent and 11.38 percent of total HMDA loans in low- and moderate-income areas, respectively. The percentage of owner-occupied housing units in low- and moderate-income geographies is 0.62 percent and 17.95 percent, respectively.

In the evaluation period using 2010 U.S. Census data, the 0.59 percent of HMDA home purchase lending in low-income geographies compared to the aggregate lenders originations of HMDA home purchase lending in low-income geographies of 0.20 percent. The bank's HMDA home purchase lending in low-income geographies slightly exceeds the percentage of owner-occupied housing units in these geographies of 0.48 percent. The percentage of HMDA home purchase lending in moderate-income geographies is 18.82, compared to the aggregate lenders HMDA originations to moderate-income geographies of 14.48 percent. The bank's percentage of HMDA home purchase lending in moderate-income geographies is slightly lower than the percentage of owner-occupied housing units in these geographies of 20.03 percent.

***Home Improvement Lending***

A very small portion of the bank's HMDA home mortgage lending in this AA is in home improvement loans and only made five total loans in 2011 in this AA. The geographic distribution of HMDA home improvement lending needs improvement.

For the evaluation period using 2000 U.S. Census data, the bank originated no HMDA home improvement loans to borrowers in low- or moderate-income geographies. Four of the loans were in middle-income geography with one loan in the upper-income geography. For the evaluation period using the 2000 U.S. Census data, the aggregate percentage of HMDA home improvement lending in low-income geographies is 0.22 percent and in moderate-income geographies is 23.68 percent. Owner occupied housing was 0.62 percent in low-income geographies and 17.95 percent in moderate-income geographies.

For the evaluation period using the 2010 U.S. Census data, the bank made no HMDA home improvement loans in low-income geographies and made one loan in a moderate-income geography representing 8.33 percent total HMDA home improvement loan originations. The aggregate lenders originated 0.39 percent and 19.16 percent, respectively, in these geographies. The percentage of HMDA home improvement lending in moderate-income geographies is significantly lower than the 20.03 percent of owner-occupied housing units in these geographies.

### ***Home Refinance Lending***

The geographic distribution of HMDA home refinance lending adequate. For the evaluation period using 2000 U.S. Census data, the bank did not originate any HMDA home refinance loans to borrowers in low-income geographies, and 1.41 percent of total HMDA refinance loans in moderate-income geographies. In that evaluation period, the aggregate lenders originated 0.12 percent and 7.75 percent of total HMDA home refinance loans in low- and moderate- income areas, respectively. The percent of owner occupied units was 0.62 percent and 17.95 percent, respectively, in low- and moderate-income geographies.

For the evaluation period using the 2010 U.S. Census data, the bank had 0.87 percent of the total HMDA loans originated in low-income geographies. The aggregate lenders had 0.18 percent. Owner occupied units comprise 0.48 percent in low-income geographies. The bank had 9.83 percent of its total HMDA refinance loans in moderate-income geographies. The aggregate lenders originated 12.49 percent. Owner occupied units comprise 20.03 percent in moderate-income geographies.

### ***Small Loans to Businesses***

Refer to Table 6 in the State of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate.

In the evaluation period using 2000 U.S. Census data, the bank originated three small business loans in this AA. The bank had one loan each in moderate, middle, and upper income geographies. Thirty-three percent of the bank's small loans to businesses were in moderate-income geographies, which is above the 18.40 percent of business located in moderate-income geographies. The aggregate lenders proportion of small loans to small businesses in moderate-income geographies was 16.34 percent.

In the 2010 U.S. Census data evaluation period, the bank originated no small loans to small businesses in the state of Florida. The aggregate lenders originated 0.68 percent and 24.87 percent in low- and moderate-income geographies, respectively, compared to 0.63 percent and 23.76 percent of small businesses located in these geographies.

### ***Lending Gap Analysis***

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in Trustco's lending patterns.

### ***Inside/Outside Ratio***

Trustco originated a substantial majority of its loans in their combined AAs during both evaluation periods. During the combined evaluation period, 92 percent of the total number of loans and 92 percent of the total dollar amount of HMDA reportable loans were made in the combined AAs. This

performance factored favorably into the overall analysis of the geographic distribution of lending by income level of geography.

### **Distribution of Loans by Income Level of the Borrower**

The overall distribution of loans to borrowers reflects good distribution among retail customers of different income levels and business customers of different size. The overall distribution of HMDA home mortgage loans to borrowers of different income levels is good. The overall distribution of loans to businesses of different sizes is adequate.

#### **Orlando-Kissimmee-Sanford, FL MSA 36740**

The overall distribution of loans to borrowers of different income levels and businesses of different sized in this AA reflects good distribution. Within this full-scope AA, Trustco's distribution of HMDA home mortgage loans by borrower income level is good, and Trustco's distribution of small loans to small businesses is adequate.

Based on 2011 Peer Mortgage data, Trustco ranked 66th out of 312 lenders with a 0.19 percent market share of HMDA loans to low-income borrowers. Additionally, Trustco ranked 51st out of 509 lenders with a 0.30 percent market share of HMDA loans to moderate-income borrowers. These rankings reflect responsiveness to the credit needs of low- and moderate-income borrowers.

In our analysis, we considered the lack of affordability for a low-income family to purchase a home. The average median housing value in the AA was \$112,304, and a low-income family earns less than \$29,000. Additionally, 10 percent of the households in this AA fall below the poverty level and are considered very low-income. The lack of affordability limits the opportunities for home purchase, home improvement, and home refinance lending to low-income families.

#### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the State of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### ***Home Purchase Lending***

The borrower distribution for home purchase lending is good.

In the evaluation period using 2000 U.S. Census data, the bank originated 8.02 percent and 27.16 percent of HMDA home purchase loans to low- and moderate-income borrowers, respectively. In that evaluation period, the aggregate lenders originated 9.01 percent and 23.94 percent of HMDA home purchase loans to low- and moderate-income borrowers, respectively.

In the evaluation period using 2010 U.S. Census data, the bank originated 12.50 percent and 22.62 percent of HMDA home purchase loans to low and moderate income borrowers, respectively. In this evaluation period, the aggregate lenders originated 8.39 percent and 19.99 percent of HMDA home purchase loans to low- and moderate-income borrowers, respectively.

For both evaluation periods, the percentage of home purchase lending to low-income borrowers is lower than the percentage of low-income families in the AA. For both evaluation periods, the percentage of home purchase lending to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

***Home Improvement Lending***

Trustco had a limited volume of home improvement lending in the evaluation period. The borrower distribution for home improvement lending is good.

In the evaluation period using 2000 U.S. Census data, the bank originated 20.00 percent and 60.00 percent of HMDA home improvement loans to low- and moderate-income borrowers, respectively. In that evaluation period, the aggregate lenders originated 15.08 percent and 21.11 percent of HMDA home improvement loans to low- and moderate- income borrowers, respectively.

In the evaluation period using 2010 U.S. Census data, the bank did not originate HMDA home improvement loans to low income borrowers. The aggregate lenders originated 13.93 percent. The bank originated 27.27 percent of HMDA home improvement loans to moderate-income borrowers and the aggregate lenders originated 23.22 percent.

For the evaluation period using 2000 U.S. Census data, the percentage of HMDA home improvement lending to low-income and moderate-income borrowers is higher than the 18.74 percent of low-income and 18.84 percent of moderate-income borrowers. For the evaluation period using 2010 U.S. Census data, the percentage of HMDA home improvement lending to low-income borrowers is lower than the 20.08 of low-income families in the AA; the percentage of HMDA home improvement lending to moderate-income borrowers is significantly higher than the 18.64 percent of moderate-income families in the AA.

***Home Refinance Lending***

The borrower distribution for home refinance lending is good.

In the evaluation period using 2000 U.S. Census data, the bank originated 4.29 percent and 14.29 percent of HMDA home refinance loans to low- and moderate-income borrowers, respectively. In that evaluation period, the aggregate lenders originated 5.86 percent and 12.90 percent of HMDA home refinance loans to low- and moderate-income borrowers, respectively.

In the evaluation period using 2010 U.S. Census data, the bank originated 3.79 percent and 17.78 percent of HMDA home refinance loans to low- and moderate-income borrowers, respectively. The aggregate lenders originated 6.71 percent and 12.93 percent, respectively.

For both evaluation periods, the percentage of home refinance lending to low- and moderate-income borrowers is lower than the percentage of low- and moderate income families in the AA

***Small Loans to Businesses***

Refer to Table 11 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate. Small loans to businesses make up a minor portion of the bank's lending activity in this AA. Small loans to businesses accounted for 3.7 percent of lending activity in the AA in the evaluation period using 2000 U.S. Census data and there was no lending activity in the evaluation period using 2010 U.S. Census data.

For the evaluation period using 2000 U.S. Census data, all three loans made to businesses in this AA were to businesses with revenues of \$1 million or less. The distribution by size of loans shows that

approximately 33 percent of the loan originations in the evaluation period using 2000 U.S. Census data are \$100,000 or less and 66 percent were between \$250,000 and \$1,000,000.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Florida lending section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

#### **Orlando-Kissimmee-Sanford, FL MSA 36740**

Community development lending was adequate for the Orlando-Kissimmee-Sanford, FL MSA 36740. Trustco originated two loans in this AA during the evaluation period that were responsive to the needs of the AA:

- A \$250,000 loan to promote economic development to the Florida Community Loan Fund.
- A \$57,000 loan to help in revitalization or stabilization of low- or moderate-income geographies.

### **Product Innovation and Flexibility**

Product innovation and flexibility had a positive impact on the lending test conclusion for the state of Florida. Trustco uses innovative and flexible lending practices in order to serve AA credit needs.

#### **Orlando-Kissimmee-Sanford, FL MSA 36740**

Product innovation and flexibility had a positive impact on the lending test conclusion for the Orlando-Kissimmee-Sanford, FL MSA 36740. Trustco offers the Affordable Housing Program (AHP) product that is also available in New York State. For more information, please refer to the section devoted to the NY-W-WP AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on the limited-scope review, the bank's performance under the lending test in the Volusia, FL MSA 19660 AA is inconsistent with the state's overall Low Satisfactory rating. For the Volusia, FL MSA 19660 AA, both Trustco's geographic and borrower distribution for HMDA home mortgage loans is poor. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA needs to improve as too few loans were made to low- or moderate-income borrowers or geographies. Lending in this AA accounted for approximately nine percent of the lending in the State of Florida.

Based on the limited-scope review, the bank's performance under the lending test in the Polk, FL MSA 29460 AA is consistent with the state's overall Low Satisfactory rating. For the Polk, FL MSA 29460 AA, Trustco's geographic distribution for HMDA home mortgage loans was good but the borrower distribution needs to improve. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was adequate. Lending in this AA accounted for approximately four percent of the lending in the State of Florida.

Based on the limited-scope review, the bank's performance under the lending test in the Manatee-Sarasota, FL MSA 35840 AA is consistent with the state's overall Low Satisfactory rating. For the

Manatee-Sarasota, FL MSA 35840 AA, Trustco's geographic distribution for HMDA home mortgage loans was good and the borrower distribution was adequate. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was adequate. Lending in this AA accounted for approximately twelve percent of the lending in the State of Florida.

Based on the limited-scope review, the bank's performance under the lending test in the Brevard, FL MSA 37340 AA is consistent with the state's overall Low Satisfactory rating. For the Brevard, FL MSA 19660 AA, Trustco's geographic distribution for HMDA home mortgage loans was adequate and the borrower distribution was adequate. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was adequate. Lending in this AA accounted for approximately three percent of the lending in the State of Florida.

Based on the limited-scope review, the bank's performance under the lending test in the Charlotte, FL MSA 39460 AA is consistent with the state's overall Low Satisfactory rating. For the Charlotte, FL MSA 39460 AA, Trustco's geographic distribution for HMDA home mortgage loans was good and the borrower distribution was adequate. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was adequate. Lending in this AA accounted for approximately two percent of the lending in the State of Florida.

Based on the limited-scope review, the bank's performance under the lending test in the Hillsborough, FL MSA 45300 AA is consistent with the state's overall Low Satisfactory rating. For the Hillsborough, FL MSA 45300 AA, Trustco's geographic distribution for HMDA home mortgage loans needs to improve but the borrower distribution was adequate. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA was adequate. Lending in this AA accounted for approximately twelve percent of the lending in the State of Florida.

Based on the limited-scope review, the bank's performance under the lending test in the Palm Beach, FL MSA 48424 AA is inconsistent with the state's overall Low Satisfactory rating. For the Palm Beach, FL MSA 48424 AA, Trustco's geographic and borrower distribution for HMDA home mortgage loans needs to improve. Trustco originated too few small loans to businesses in this AA to assess geographic and borrower distribution. Overall lending performance in the AA needs to improve. Lending in this AA accounted for approximately three percent of the lending in the State of Florida.

Refer to the Tables 1 through 13 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in Florida is rated as adequate. Based on full-scope reviews, the bank's performance in the Orlando-Kissimmee-Sanford, FL MSA 36740 is adequate. The bank's performance under the Investment Test also considers the investments that have a statewide and/or regional impact to include the bank's AAs.

Refer to Table 14 in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Orlando-Kissimmee-Sanford, FL MSA 36740**

Trustco has an adequate level of qualified investments and grants and exhibits responsiveness to meeting the identified needs of the Orlando-Kissimmee-Sanford, FL MSA 36740. CRA-qualified investments, including grants, donations, and other charitable contributions, originated during the evaluation period total \$78 thousand to 10 different regional organizations. The grants, donations, and charitable contributions originated during the period include the following:

- The bank donated a total of \$6,000 to the Homes in Partnership, Inc. This organization provides affordable housing for low- and moderate-income families.
- The Center for Affordable Housing, Inc. was given \$24,000 during the evaluation period. The agency provides the development of affordable housing along with transitional housing for homeless families. The organization also does numerous outreach services including counseling, training, and financial education.

### **Statewide/Regional Investments**

In all years throughout the evaluation period, the bank donated a total of \$32,000 to the Florida Community Loan Fund. Trustco also provided a loan to the Florida Community Loan Fund. This entity is engaged in providing and developing affordable housing and improving those communities.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the limited-scope AAs was weaker than the bank's overall performance in the state as a result of fewer investments, grants, and donations in these AAs. The weaker performance had moderate impact on the overall investment test rating.

Refer to Table 14 in the State of Florida section of Appendix D for the facts and data to support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in Florida is rated as Low Satisfactory. Based on a full-scope review, the bank's performance in the Orlando-Kissimmee-Sanford, FL MSA 36740 AA is low satisfactory.

### **Retail Banking Services**

Refer to Table 15 in the state of Florida section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

**Orlando-Kissimmee-Sanford, FL MSA 36740**

Trustco's delivery systems are accessible to limited portions to geographies and individuals of different income levels in this AA. Trustco operates 32 of its 135 branches in this AA. Of these 32 branches, none were in a low-income geography, 5 were in a moderate-income geography, 13 were located in a middle-income geography, and 14 were located in an upper-income geography.

The distribution of branches in low- and moderate-income geographies is lower than the percentage of the population residing in such geographies. There are no branches in low-income geographies where 1.63 percent of the population resides. The bank has five branches, or 15.63 percent of the total branches in this AA, in moderate-income geographies. This compares to 22.82 percent of the population residing in moderate-income geographies.

Trustco's services do not vary in a way that inconveniences certain portions of the AA. Retail services are offered equally at every branch. Services consist of traditional retail products such as checking, savings, and Certificate of Deposit accounts. Hours are uniform among all branches in this AA. Thirty-one of the thirty-two branches offer drive-up service and all branches offer 24-hour ATM access.

During the evaluation period, Trustco opened one new branch in this AA. The branch is located in a middle-income geography.

Trustco offers alternate delivery systems such as mobile banking and online banking. However, as there is no determination of the volume of use in low- and moderate-income geographies and by low- and moderate-income individuals, we placed no weight on these products and services.

**Community Development Services**

Trustco's performance in providing community development services is adequate in the Orlando-Kissimmee-Sanford, FL MSA 36740.

**Orlando-Kissimmee-Sanford, FL MSA 36740**

Trustco provides an adequate level of CD services within the Lake, Orange, Osceola, & Seminole AA. Bank management and employees participated in organizations that promote housing, social, and economic development. These community development services are relatively responsive to community development needs in the AA. The following highlights the major services provided:

- An employee volunteered in an organization that provides food for low- and moderate-income youth.
- Several employees served as volunteers in an organization that provides food and clothing for low- and moderate-income individuals.
- An employee served as a volunteer in an organization that provides affordable housing to low- and moderate-income families.
- Several employees served as volunteers of an organization that provides counseling and skill-building programs for low- and moderate-income youth.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Volusia MSA 19660 AA, Polk MSA 29460 AA, Manatee-Sarasota MSA 35840 AA, Brevard MSA 37340 AA, Charlotte MSA 39460 AA, Hillsborough MSA 45300 AA, and Palm Beach MSA 48424 AA is weaker than the bank's overall Low Satisfactory performance under the Service Test in the State of Florida. Trustco's performance in the limited-scope AAs is based on the distribution of branches by income level as well as community development activities. The weaker performance in these AAs had a partial impact on the overall service test rating.

Refer to Table 15 in the state of Florida section of Appendix D for the facts and data used to support these conclusions.

## **Berkshire, MA Area Rating**

### **Berkshire, MA MSA 38340**

**CRA rating for the Berkshire, MA: Satisfactory**

**The lending test is rated: Low Satisfactory**

**The investment test is rated: Low Satisfactory**

**The service test is rated: Low Satisfactory**

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to the community credit needs of its AA;
- A substantial majority of home mortgage loans and small loans to small businesses are originated within the bank's AA;
- Trustco was ranked sixteenth in HMDA home purchase lending, 19<sup>th</sup> in home improvement lending, and 27<sup>th</sup> in home refinance lending by total number and dollar amounts lent in 2011;
- The geographic distribution of loans reflects adequate penetration throughout the AA;
- The distribution of loans to borrowers reflects adequate distribution among retail customers of different income levels and business customers of different sizes;
- The bank made an adequate level of qualified community development investments, donations, and grants;
- Service delivery systems are reasonably accessible to individuals of different income levels in the AA and Trustco provides a limited level of community development services;

### **Description of Institution's Operations in the Berkshire, MA MSA 38340.**

Trustco has one AA within in the state of Massachusetts, Berkshire MSA 38340.

### **Scope of Evaluation in the Berkshire, MA MSA 38340**

We conducted a full-scope review of the Berkshire, MA MSA 38340, which is the bank's only AA within the state of Massachusetts. There are four branches in this AA, representing 0.7 percent of the bank's deposits, 1 percent of the bank's home mortgage lending, and 1.2 percent of the bank's small loans to businesses. In the first evaluation period, approximately 94 percent of loans were home mortgage loans. Small loans to businesses made up the remaining six percent of lending activity. In the second evaluation period, 100 percent of lending was for home mortgages.

### **Community Contact**

We contacted a community member to identify community development needs and opportunities within the Bennington AA. Refer to the Market Profile section in Appendix C for details.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's lending performance in the Berkshire, MA MSA 38340 is rated Low Satisfactory.

### **Lending Activity**

Lending levels reflect adequate responsiveness to AA credit needs after taking into consideration the level of competition in the AA. Refer to Table 1 Lending Volume in the Berkshire, MA MSA 38340 Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's lending activity.

### **Berkshire, MA MSA 38340**

Trustco's lending activity in the Berkshire, MA MSA 38340 is Low Satisfactory, as the bank's lending levels reflect adequate responsiveness to the credit needs of the community. Trustco has four branches in this AA, holding 0.66 percent of the bank's total deposits as of June 30, 2012. Competition for both loans and deposits is moderate in this AA. According to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco held just 0.83 percent of the deposit market share. According to the same deposit data, Trustco's major competitors in the Berkshire, MA MSA 38340 are Berkshire Bank (first with 20 branches and 42.47 percent deposit share), TD Bank (second with seven branches and 13.24 percent share), and Hoosac Bank (third with 3 branches and 12.07 percent share).

The 2011 Peer Mortgage Data indicates Trustco ranked 16<sup>th</sup> out of 82 mortgage lenders with a market share of 1.2 percent. Based on 2011 Peer Small Business Data, Trustco is ranked 24<sup>th</sup> out of 34 lenders with a market share of 0.09 percent. Of the total loans originated in this AA, 94 percent were home mortgage loans and 6 percent were small loans to businesses. Among home mortgage originations in this AA, 40 percent were home purchase loans, 7 percent were home improvement loans, and 53 percent were home refinance loans.

For the evaluation period using the 2010 U.S. Census data, 100 percent of the loans were home mortgage loans. Among home mortgage originations in this AA, 18 percent were home purchase loans, none were home improvement loans, and 82 percent were home refinance loans.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic dispersion of loans reflects adequate penetration throughout the AA. The overall geographic dispersion of home mortgage loans is adequate. The overall geographic dispersion of small business loans is poor.

**Berkshire, MA MSA 38340**

In the evaluation period using 2000 U.S. Census data, Trustco did not originate any home mortgage loans to borrowers in low-income geographies. As such, 2011 Peer Mortgage data does not rank Trustco on the list of institutions lending to low-income geographies. Based on the same data, Trustco ranked 15<sup>th</sup> out of 43 lenders with a 0.85 percent market share of HMDA loans in moderate-income geographies.

***Home Mortgage Loans***

Refer to Tables 2, 3, and 4 in the Berkshire, MA MSA 38340 section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

***Home Purchase Lending***

The geographic distribution of home purchase lending is adequate.

For both evaluation periods using U.S. Census data, the bank did not originate any HMDA home purchase loans in low-income geographies. The proportion of owner-occupied housing in low-income geographies was only 0.62 percent based on 2000 U.S. Census data and 0.63 percent based on 2010 U.S. Census data. In the evaluation period using 2000 U.S. Census data, the percentage of HMDA home purchase lending in moderate-income geographies was 16.67 percent, which exceeds the percentage of owner-occupied units in low-income geographies of 12.05 percent and aggregate HMDA lending at 13.76 percent. In the 2010 U.S. Census evaluation period, no loans were made to moderate-income geographies. Owner occupied housing comprises 6.91 percent of moderate-income geographies, and the aggregate lenders had 7.36 percent of loans in moderate-income geographies.

***Home Improvement Lending***

The geographic distribution of HMDA home improvement lending is poor. The bank did not originate any HMDA home improvement loans in low- or moderate-income geographies in either evaluation period. During the 2000 U.S. Census evaluation period, the bank originated two loans, both to the middle-income geography. In both evaluation periods, owner occupied units in low-income geographies made up less than one percent of owner-occupied units in the AA. We placed little weight on this type of lending when evaluating the bank's geographic distribution of loans by income level.

***Home Refinance Lending***

The geographic distribution of home refinance lending is adequate. During the 2000 census evaluation period, the bank did not originate HMDA home refinance loans to low-income geographies. The bank originated 6.25 percent to moderate-income geographies. The aggregate lenders originated only 0.10 percent and 7.91 percent of total HMDA loans in low- and moderate-income areas, respectively, which falls below the 12.67 percent of owner occupied houses during the first evaluation period.

During the 2010 census evaluation period, the bank did not originate home refinance loans to low- or moderate-income geographies. The aggregate lenders originated 0.45 percent and 4.15 percent in low- and moderate-income geographies, respectively. Only 7.54 percent of housing is owner occupied in low- and moderate-income geographies.

***Small Loans to Businesses***

Refer to Table 6 in the Berkshire, MA MSA 38340 section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is poor. For the evaluation period using 2000 U.S. Census data, the bank originated two small loans to businesses in the AA. The bank did not originate any small loans to businesses located in low-income or moderate-income geographies. The aggregate lenders originated 6.65 percent and 11.66 percent of their small loans to businesses in low- and moderate-income geographies, respectively. The aggregate lenders proportion of lending to low- and moderate-income geographies approximates the proportion of businesses in those geographies.

For the evaluation period using 2010 U.S. Census data, the bank did not originate any small loans to businesses in the AA. The aggregate lenders originated 6.19 percent and 9.02 percent of their small business loans in low- and moderate-income geographies. The aggregate lenders proportion of lending to low- and moderate-income geographies approximates the proportion of businesses in those geographies.

### ***Lending Gap Analysis***

We found no unexplained conspicuous gaps in Trustco's lending patterns. The bank's Berkshire AA has a low volume of low-income census tracts. Overall, the AA only contains 1.00 or 2.44 percent low-income census tracts, and 8.00 or 19.51 percent moderate-income census tracts. Within these census tracts, only 12.67 percent of the housing units were owner-occupied based on 2000 U.S. Census data. Based on 2010 U.S. Census data, owner-occupied housing units comprised 7.54 percent of all housing units in the AA. None of the bank's branches are located in low- or moderate- income geographies, three branches are located in middle-income geography, and one is in an upper-income geography.

### ***Inside/Outside Ratio***

Trustco originated a substantial majority of its loans in their combined AAs during both evaluation periods. During the combined evaluation period, 92 percent of the total number of loans and 92 percent of the total dollar amount of HMDA reportable loans were originated in the combined AA. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

## **Distribution of Loans by Income Level of the Borrower**

The dispersion of loans to borrowers reflects adequate distribution among retail customers of different income levels and business customers of different size. The overall distribution of home mortgage loans to borrowers of different income levels is adequate. The overall distribution of loans to businesses of different sizes is poor.

### **Berkshire, MA MSA 38340**

The overall distribution of loans to borrowers of different income levels and businesses of different sizes in this AA reflects adequate distribution. Trustco's distribution of home mortgage loans by borrower income level is adequate, and Trustco's distribution of small loans to businesses of different sizes is poor.

In the evaluation period using 2000 U.S. Census data, Trustco did not originate any home mortgage loans to low-income borrowers. As such, 2011 Peer Mortgage data does not rank Trustco on the list of institutions lending to low-income geographies. Based on the same data, Trustco ranked 14<sup>th</sup> out of 60 lenders with a 1.5 percent market share of HMDA loans in moderate-income geographies.

In our analysis, we considered the lack of affordability for a low-income family to purchase a home. The average median housing value in the AA was \$227,331, and a low-income family earns less than \$34,900 annually. The lack of affordability limits the opportunities for home purchase, home improvement, and home refinance lending to low-income families.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the Berkshire, MA MSA 38340 AA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Lending***

The borrower distribution for home purchase lending is adequate. For both evaluation periods, the bank made no home purchase loans to low-income families. For both evaluation periods, the percentage of HMDA home purchase lending to moderate-income borrowers is higher than the percentage of moderate-income families in the AA. The percentage of bank loans to moderate-income borrowers is also significantly higher than the aggregate lenders.

### ***Home Improvement Lending***

The borrower distribution for home improvement lending is poor. In the 2000 US Census evaluation period, the bank only made two HMDA home improvement loans in the AA. One home improvement loan was made to a middle-income borrower and one was made to an upper-income borrower. For the evaluation period using 2010 U.S. Census data no HMDA loans were made. We placed little weight on this type of lending when evaluating the bank's distribution of loans by income level of the borrower.

### ***Home Refinance Lending***

The borrower distribution of home refinance lending is good. For the evaluation period using 2000 U.S. Census data, the bank originated 12.50 percent of its HMDA loans for low-income borrowers and 18.75 for moderate-income borrowers. This exceeded the aggregate lending data for both areas. For the evaluation period using 2010 U.S. Census data, the bank did not originate any loans in low-income areas, but did originate 21.21 percent of its loans to moderate-income borrowers, which exceeded the percentage of moderate-income families. The aggregate lenders originated 5.16 percent and 15.82 percent in home refinance loans to low- and moderate-income borrowers, respectively.

### ***Small Loans to Businesses***

Refer to Table 11 in the Berkshire, MA MSA 38340 section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is poor. For the evaluation period using 2000 U.S. Census data, the bank originated two small loans to businesses in the AA. Neither of these loans was to businesses with revenues of \$1 million or less, although both loans were less than \$250,000. The bank did not originate any small loans to businesses in the evaluation period using 2010 U.S. Census data. We did not place significant emphasis on this finding when determining our final assessment.

## **Community Development Lending**

### **Berkshire, MA MSA 38340**

Community development lending had no impact on the lending test for the Berkshire, MA MSA 38340. Trustco made no qualified community development loans during the evaluation period.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a positive impact on the lending test conclusion for the state of Massachusetts. Trustco uses innovative and flexible lending practices in order to serve AA credit needs.

### **Berkshire, MA MSA 38340**

Product innovation and flexibility had a positive impact on the lending test conclusion for the Albany-Schenectady-Troy MSA 10580. Trustco offers the Affordable Housing Program (AHP) product that is also available in New York State. For more information, please refer to the section devoted to the NY-W-WP AA.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in Massachusetts is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Berkshire, MA MSA 38340 is Low Satisfactory. The bank's performance under the Investment Test also considers the investments that have a statewide and/or regional impact to include the bank's AAs.

Refer to Table 14 in the Berkshire, MA MSA 38340 section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Berkshire, MA MSA 38340**

Trustco has a Low Satisfactory level of qualified investments and grants and exhibits adequate responsiveness to meeting the identified needs of the AA. CRA-qualified investments, including grants, donations, and other charitable contributions, originated during the evaluation period total \$8,000. The grants, donations, and charitable contributions originated during the period include the following:

- The bank donated \$2,500 to the Berkshire Housing Development Corporation, which provides affordable houses for low-income and moderate-income individuals in the AA.
- The bank donated \$500 to the Manos Unidas Multicultural Educational Coop, which helped renovate a building for low- and moderate-income housing.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Berkshire AA is adequate. Service delivery systems are accessible to essentially all portions of the institution's AAs. Trustco provides a limited level of community development services.

### **Berkshire, MA MSA 38340**

Trustco's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Berkshire MA MSA AA. Trustco operates 4 of its 135 branches in this AA. Of these four

branches, none were in a low-income geography, none were in a moderate-income geography, three were located in a middle-income geography, and one was located in an upper-income geography.

There are no branches in low-income geographies where 2.72 percent of the population resides and no branches in moderate-income geographies where 16.73 percent of the population resides. The distribution of branches in low- and moderate-income geographies is lower than the percentage of the population residing in such geographies.

Trustco's services do not vary in a way that inconveniences certain portions of the AA. Retail services are offered equally at every branch. Services consist of traditional retail products such checking, savings, and certificate of deposit accounts. Hours are uniform among all branches in this AA. Three out of the four branches offer drive-through service. All branches offer 24-hour ATM access.

Trustco offers alternate delivery systems such as mobile banking and online banking. However, as there is no determination of the volume of use in low- and moderate- income geographies and by low- and moderate-income individuals, we placed no weight on these products and services.

### **Community Development Services (CD)**

#### **Berkshire, MA MSA 38340**

Trustco provides a limited level of CD services within the Berkshire AA. Bank employees participated in organizations that promote housing and social development. These community development services are relatively responsive to community development needs in the AA. The following highlights the major services provided:

- An employee served as a volunteer at a child-welfare organization that provides services at the community, school, and home levels.
- An employee volunteered at an organization that builds affordable housing for low-income families and individuals.

## **Non-MSA Vermont Area Rating**

### **Bennington County: Non-MSA (Vermont)**

**CRA rating for the Non-MSA Vermont Bennington: Satisfactory**

**The lending test is rated: High Satisfactory**

**The investment test is rated: Low Satisfactory**

**The service test is rated: Low Satisfactory**

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the community credit needs of its AA;
- A substantial majority of home mortgage loans and small loans to small businesses are originated within the bank's AA;
- Trustco was ranked 21<sup>st</sup> in HMDA home purchase lending, 16<sup>th</sup> home refinance lending by total number in 2011;
- The geographic distribution of loans reflects good penetration throughout the AA;
- The distribution of loans to borrowers reflects good distribution among retail customers of different income levels and business customers of different sizes;
- The bank made an adequate level of qualified community development investments, donations, and grants;
- Service delivery systems are reasonably accessible to individuals of different income levels in the AA and Trustco provides an adequate level of community development services;

### **Description of Institution's Operations in the Non-MSA VT-Bennington**

Trustco has one AA within Vermont which includes one branch.

### **Scope of Evaluation in the Non-MSA Vermont**

We conducted a full-scope review of the Non-MSA Vermont- Bennington, which is the only AA within Vermont.

#### **Non-MSA Vermont-Bennington**

We conducted a full-scope review of the Non-MSA Vermont- Bennington branch, deposits, and loan originations in this AA. In this AA, 0.24 percent of the bank's deposits, 0.5 percent of the bank's home mortgage lending, while no small loans were made to businesses the Non-MSA Vermont- Bennington AA. In both evaluation periods, all lending activity was home mortgage loans.

**Community Contact**

We contacted a community member to identify community development needs and opportunities within the Bennington AA. Refer to the Market Profile section in Appendix C for details.

**LENDING TEST****Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's lending performance in the Non-MSA Vermont- Bennington is High Satisfactory.

**Lending Activity**

Lending levels reflect good responsiveness to AA credit needs after taking into consideration the level of competition in the AA. Refer to Table 1 Lending Volume in the Non-MSA Vermont- Bennington Area section of Appendix D for the facts and data used to evaluate the bank's lending activity.

**Non-MSA Vermont-Bennington**

The bank performance in the Non-MSA Vermont- Bennington is High Satisfactory, and the bank's lending levels reflect good responsiveness to the credit needs of the community. Trustco has one branch in this AA, holding 0.24 percent of the bank's total deposits as of June 30, 2012. Competition for both loans and deposits is moderate in this AA According to the June 30, 2012 FDIC Summary of Deposit Market Share report. Trustco's major competitors in the Non-Vermont AA, are TD Bank (28.13 percent deposit share), People's United (27.54 percent market share), KeyBank (14.38 percent market share), and Merchants (13.83 percent market share).

The 2011 Peer Mortgage Data indicates Trustco ranked 21st out of 49 mortgage lenders with a market share of 1.01 percent. Of the loans originated in this AA, all were home mortgage loans and with no small loans to businesses. Among the 14 home mortgage originations in this AA, 3 were home purchase loans and 11 were home refinance loans.

**Distribution of Loans by Income Level of the Geography**

The overall geographic dispersion of loans reflects good penetration throughout the AA.

**Non-MSA Vermont-Bennington**

In the evaluation period using 2000 U.S. Census data, Trustco did not originate any home mortgage loans to borrowers in low-income geographies. As such, 2011 Peer Mortgage data does not rank Trustco on the list of institutions lending to low-income geographies. Based on the same data, Trustco ranked 10<sup>th</sup> out of 21 lenders with 3.51 percent market share of HMDA loans in moderate-income geographies.

***Home Mortgage Loans***

Refer to Tables 2, 3, and 4 in the Non-MSA Vermont- Bennington section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Lending***

The geographic distribution of home purchase lending is poor. For the evaluation period using 2000 U.S. Census data, the bank did not originate any HMDA home purchase loans in moderate-income geographies. The aggregate lenders originated 18.94 percent. In moderate-income geographies, owner-occupied housing comprises 14.97 percent of all housing units.

In the evaluation period using 2010 U.S. Census data, no HMDA loans were originated in moderate-income geographies. The aggregate lenders originated 12.57 percent. Moderate-income geographies represent 17.85 percent of owner occupied housing.

There were no owner-occupied housing units in low-income geographies in either evaluation period. For both evaluation periods, the volume of home purchase lending was low.

### ***Home Improvement Lending***

The bank did not make any HMDA home improvement loans during either evaluation period.

### ***Home Refinance Lending***

The geographic distribution of home refinance lending is good.

For the evaluation period using 2000 U.S. Census data, the bank originated 36.36 percent of the total HMDA home refinance loans to borrowers in moderate-income geographies. This exceeds the 14.97 percent of owner occupied units in the AA. In that evaluation period, the aggregate lenders originated just 7.40 percent of total HMDA loans in moderate-income geographies.

For the evaluation period using 2010 U.S. Census data, the bank originated 36.00 percent of total HMDA loans in moderate-income geographies. This exceeds the 17.85 percent of owner occupied housing in these geographies. The aggregate lenders originated 12.48 percent of HMDA home refinance loans in moderate-income geographies.

There were no owner-occupied housing units in low-income geographies in either evaluation period.

### ***Small Loans to Businesses***

No small loans to businesses were made in the Non-MSA Vermont- Bennington during the two evaluation periods.

### ***Lending Gap Analysis***

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in Trustco's lending patterns.

### ***Inside/Outside Ratio***

Trustco originated a substantial majority of its loans in their combined AAs during both evaluation periods. During the combined evaluation period, 92 percent of the total number of loans and 92 percent of the total dollar amount of HMDA reportable loans were made within the combined AAs. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

## **Distribution of Loans by Income Level of the Borrower**

The distribution of loans to borrowers reflects good distribution among retail customers of different income levels. The overall distribution of home mortgage loans to borrowers of different income levels is good.

### **Non-MSA Vermont-Bennington**

The overall distribution of loans to borrowers of different income levels in this AA reflects good distribution. Trustco's distribution of home mortgage loans by borrower income level is good; no loans to businesses were made.

In both evaluation periods, Trustco did not originate any home mortgage loans to low-income borrowers. As such, 2011 Peer Mortgage data does not rank Trustco on the list of institutions lending to low-income geographies. Based on the same data, Trustco ranked 10<sup>th</sup> out of 31 lenders with a 4.07 percent market share of HMDA loans in moderate-income geographies.

In our analysis, we considered the lack of affordability for a low-income family to purchase a home. The average median housing value in the AA was \$242,709, and a low-income family earns less than \$30,259 annually. The lack of affordability limits the opportunities for home purchase, home improvement, and home refinance lending to low-income families.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the Non-MSA Vermont- Bennington section of Appendix D for the facts and data used to evaluation the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Lending***

The borrower distribution for home purchase lending is adequate. For both evaluation periods, the bank made no home purchase loans to low-income families. The proportion of low-income borrowers was 18.30 percent and 18.77 percent for the evaluation periods, respectively.

For the 2000 US Census data evaluation period, the percentage of home purchase lending to moderate-income borrowers is 66.67 percent, which is significantly higher than the 18.60 percent of moderate-income families. The aggregate lenders originated 7.52 percent and 24.06 percent of home purchase loans to low- and moderate-income borrowers, respectively.

In 2010, no loans were made to for home purchases to moderate-income individuals. The aggregate lenders originated 7.89 percent and 18.75 percent of home purchase loans to low- and moderate-income borrowers, respectively, in this evaluation period.

### ***Home Improvement Lending***

The bank did not make any home improvement loans during either evaluation period.

### ***Home Refinance Lending***

The borrower distribution of home refinance lending is good.

For the evaluation period using 2000 U.S. Census data, the percentage of HMDA home refinance lending to low- and moderate-income borrowers is somewhat higher than the percentage of low- and

moderate-income families in the AA. The percentage of lending to low- and moderate-income borrowers was 54.54 percent for this evaluation period while the aggregate lending data was 22.91 percent.

The bank originated no HMDA home refinance loans to low-income borrowers in the 2010 US Census evaluation period. The aggregate lenders originated 4.28 percent of loans to low-income borrowers. The percentage of HMDA home refinance lending to moderate-income borrowers is 33.33 percent compared to moderate-income families of 19.57 percent in the AA. The aggregate lenders provided 16.14 percent of HMDA home refinance loans to moderate-income borrowers.

### ***Small Loans to Businesses***

No small loans to businesses were made in the Non-MSA Vermont- Bennington during the two evaluation periods.

## **Community Development Lending**

### **Non-MSA Vermont-Bennington**

Community development lending had no impact on the lending test for the Non-MSA Vermont-Bennington. Trustco made no qualified community development loans during the evaluation period.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a positive impact on the lending test conclusion for the state of Vermont. Trustco uses innovative and flexible lending practices in order to serve AA credit needs.

### **Non-MSA Vermont-Bennington**

Product innovation and flexibility had a positive impact on the lending test conclusion for the Albany-Schenectady-Troy MSA 10580. Trustco offers the Affordable Housing Program (AHP) product that is also available in New York State. For more information, please refer to the section devoted to the NY-W-WP AA.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in Vermont is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Non-MSA Vermont- Bennington is Low Satisfactory. The bank's performance under the Investment Test also considers the investments that have a statewide and/or regional impact to include the bank's AAs.

Refer to Table 14 in the Non-MSA Vermont- Bennington section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Non-MSA Vermont-Bennington**

Trustco has a Low Satisfactory level of qualified investments and grants and exhibits adequate responsiveness to meeting the identified needs of the Non-MSA Vermont- Bennington. CRA-qualified investments, including grants, donations, and other charitable contributions, originated during the evaluation period included:

- Trustco donated a total of \$12,000 to the Vermont Community Loan Fund. The Fund provides loans for affordable housing development, small business, and community facilities.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in Vermont is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Non-MSA Vermont- Bennington is Low Satisfactory.

### **Retail Banking Services**

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### **Non-MSA Vermont-Bennington**

Trustco's delivery systems provide limited access to geographies and individuals of different income levels in the Vermont AA. Trustco operates one branch in this AA. This branch is located in a moderate-income geography.

Trustco's services do not vary in a way that inconveniences this AA. Services consist of traditional retail deposit and credit products. This branch offers 24-hour ATM access and a drive-up service.

Trustco offers alternate delivery systems such as mobile banking and online banking. However, as there is no determination of the volume of use in low- and moderate- income geographies and by low- and moderate-income individuals, we placed no weight on these products and services.

### **Community Development Services (CD)**

Trustco's performance in providing community development services need to improve in the Non-MSA Vermont- Bennington AA.

#### **Non-MSA Vermont-Bennington**

Trustco provides a limited level of CD services within the Vermont AA. Bank employees participated in organizations that promote housing and social development. The following highlights the major services provided:

- An employee serves as board president of an organization that offers long-term care to individuals covered under the Medicare and Medicaid programs. The organization is located in a moderate-income area.
- Several employees volunteered in an organization that collects and donates clothing for low-income children.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 1/05/2010 to 07/22/2013 Investment and Service Tests and CD Loans: 1/1/2011 to 6/30/2013	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
TrustCo Bank Corp. NY (Trustco Bank) Glenville, New York	Home mortgage loans, small loans to businesses, CD loans, investments, and services	
<b>List of AAs and Type of Examination</b>		
<b>AA</b>	<b>Type of Exam</b>	
Albany-Schenectady-Troy MSA 10580 New York-Wayne-White Plains, NY-NJ Metropolitan District 35644 Orlando-Kissimmee-Sanford County MSA 36740 Non-MSA Vermont- Bennington Berkshire, MA MSA 38340 Glens Falls MSA 24020 Kingston MSA 28740 Poughkeepsie-Newburgh-Middletown MSA 39100 Columbia County and Green County non-MSA, Volusia MSA 19660 Polk MSA 29460, Manatee-Sarasota MSA 35840 Brevard MSA 37340 Charlotte MSA 39460 Hillsborough MSA 45300 Palm Beach MSA 48424	Full Scope Full Scope Full Scope Full Scope Full Scope Limited Scope	

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

<b>RATINGS Trustco</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
Trustco Bank	High Satisfactory	High Satisfactory	High Satisfactory	High Satisfactory
<b>Multistate Metropolitan Area or State:</b>				
NY-NJ Metropolitan District	Low Satisfactory	Low Satisfactory	High Satisfactory	Low Satisfactory
New York	High Satisfactory	High Satisfactory	High Satisfactory	High Satisfactory
Florida	Low Satisfactory	Low Satisfactory	High Satisfactory	Low Satisfactory
Massachusetts	Low Satisfactory	Low Satisfactory	High Satisfactory	Low Satisfactory
Vermont	Low Satisfactory	Low Satisfactory	High Satisfactory	Low Satisfactory

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

### Multistate MSA

#### New York-New Jersey Multistate AA

##### Multistate NY and NJ

Demographic Information for Full Scope Area: Multistate NY and NJ						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	467	1.93	6.64	22.91	67.24	1.28
Population by Geography	2,165,916	1.67	6.68	23.00	68.38	0.28
Owner-Occupied Housing by Geography	511,305	0.23	2.03	16.48	81.26	0.00
Business by Geography	229,409	1.07	6.09	21.13	71.66	0.05
Farms by Geography	3,791	0.47	4.59	16.83	78.08	0.03
Family Distribution by Income Level	548,686	12.44	10.63	14.56	62.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	126,555	4.11	14.75	34.16	46.98	0.00
Median Family Income		64,171	Median Housing Value	507,493		
HUD Adjusted Median Family Income for 2012		68,300	Unemployment Rate (2010 US Census)	3.09%		
Households Below Poverty Level		7%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Trustco’s Multistate New York-New Jersey AA is a portion of the New York-Wayne-White Plains, NY-NJ Metropolitan District 35644, which is a subset of the larger New York-Newark-Edison, NY-NJ-PA MSA 35620. The New York-Wayne-White Plains, NY-NJ MD includes Bergen County, NJ; Hudson County, NJ; Passaic, NJ; Bronx County, NY; Kings County, NY; New York County, NY; Putnam County, NY; Queens County, NY; Richmond County, NY; Rockland County, NY; and Westchester County, NY. Trustco designated all of Rockland County, NY; Westchester County, NY; and Bergen County, NJ as the areas the bank could reasonably service as its AA.

The New York-Wayne-White Plains, NY-NJ MD 35644 is comprised of 467 census tracks following the 2010 census changes. Of the census tracts, 1.93 percent are low-income, 6.64 percent are moderate-income, 22.91 percent are middle-income, and 67.24 percent are upper-income. Another 1.28 percent of tracts have not been assigned an income classification.

According to the 2010 U.S. Census data, the AA had a total population of 2,165,916. The AA contains 548,686 families, and 12.44 percent are low-income, 10.63 percent are moderate-income, 14.56 percent are middle-income, 62.37 percent are upper-income. The 2010 median family income was \$64,171 and the 2012 HUD adjusted median family income is \$68,300. Approximately 7 percent of households live below the poverty level in the AA.

The 2010 U.S. Census data reported that there are 511,305 owner-occupied housing units in the AA. Of all owner-occupied housing, 0.23 percent is located in low-income geographies, 2.03 percent is located in moderate-income geographies, 16.48 percent is located in middle-income geographies, and 81.26 percent is located in upper-income geographies. The median housing cost is \$507,493. According to 2000 U.S. Census data, the median housing cost was \$264,381.

Based on the housing value and the 2012 HUD updated median family income, there is a lack of affordability for a low-income individual or family to purchase a home. According to the above, the average median housing value is \$507,493, and a low-income individual or family earns less than \$35,150.

According to 2012 Business Geodemographic data, there are 229,409 businesses and 3,791 farms in this Metropolitan District. Approximately 68 percent of businesses reporting have revenues less than or equal to \$1 million, 5 percent of businesses reporting have revenues greater than \$1 million, and 27 percent of businesses did not report revenue information. Of the businesses, 1.07 percent are located in low-income geographies, 6.09 percent are located in moderate-income geographies, 21.13 percent are located in middle-income geographies, and 71.66 percent are located in upper-income geographies. A small amount of businesses are located in geographies that have not been assigned an income classification.

The primary industries in this Metropolitan District are professional and business services, education and health services, and state and local government. The top employers in the area are Metropolitan Transportation Authority, New York City Health and Hospitals Corp., JP Morgan Chase & Co., Citigroup Inc., and North-Shore Long Island Jewish Health System.

According to the 2010 U.S. Census the New York-Wayne-White Plains, NY-NJ MD's unemployment rate was 3.09 percent. According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the New York-Northern New Jersey-Long Island, NY-NJ-PA MSA was 8.2 percent as of June 30, 2013, which is above the New York State unemployment rate of 7.5 percent and the national average of 7.4 percent. In June 2013, the unemployment rate for Rockland County, NY was 5.9 percent, Westchester County, NY was 7.1 percent, and Bergen County, NJ was 8.1 percent.

Trustco operates 82 of its 138 branch offices in New York state; 16 of the 82 New York state branches operate in this AA. Competition for both loans and deposits is very strong in this AA, especially from larger multistate financial institutions. According to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco held just 0.03 percent of the deposit market share in this MD. According to the same deposit data, Trustco's major competitors in the New York-Northern New Jersey-Long Island, NY-NJ-PA MSA are JP Morgan Chase Bank (first with 950 branches and 34.53 percent deposit share), The Bank of New York Mellon (second with one branch and 7.91 percent share), Bank of America (third with 477 branches and 7.84 percent share), Citibank (fourth with 297 branches and 6.13 percent share), and HSBC Bank, USA (fifth with 172 branches and 5.33 percent share).

The 2011 Peer Mortgage Data indicates Trustco ranked 77<sup>th</sup> out of 356 mortgage lenders with a market share of 0.17 percent. Based on 2011 Peer Small Business Data, Trustco is ranked 74<sup>th</sup> out of 136 lenders with a market share of 0.01 percent. Of the total loans originated in this AA, 94 percent were home mortgage loans and 6 percent were small loans to businesses. Among home mortgage originations in this AA, 43 percent were home purchase loans, 56 percent were home refinance loans, and the remainder were home improvement loans.

Our community contact in the New York-Newark-Edison MSA was contacted as part of another CRA examination on October 12, 2012. The community contact is from Women's Enterprise Development Center, an economic development organization focused on helping low- and moderate-income women become economically self-sufficient through small business development, funding, and support. The organization serves Westchester County, New York, and the lower Hudson Valley. The contact indicated that small businesses are in need of financial support from area financial institutions, who generally are not willing to take the risks necessary to meet the needs of entrepreneurial low- and moderate-income individuals. The contact has noticed an increase in class attendance teaching business skills and English as a second language. The contact indicated that bank's do not have the needed incentive to fund start-ups and local businesses and believes community banks could be involved with more low- and moderate-income individuals in the community.

## State of New York

### Albany-Schenectady-Troy, NY MSA 10580

#### Albany-Schenectady MSA

Demographic Information for Full Scope Area: Albany-Schenectady MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	218	11.01	16.51	50.00	21.56	0.92
Population by Geography	870,716	9.63	14.16	50.96	24.89	0.37
Owner-Occupied Housing by Geography	229,151	4.37	11.32	56.55	27.76	0.00
Business by Geography	72,006	7.48	15.81	50.41	26.27	0.03
Farms by Geography	1,952	1.95	10.81	66.39	20.85	0.00
Family Distribution by Income Level	213,800	20.53	18.05	21.80	39.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	82,480	15.02	20.96	49.39	14.64	0.00
Median Family Income		74,739	Median Housing Value		186,839	
HUD Adjusted Median Family Income for 2013		78,100	Unemployment Rate (2010 US Census)		3.26%	
Households Below Poverty Level		10%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2013 HUD updated MFI

Trustco's designated AA is comprised of the five contiguous counties within the Albany-Schenectady-Troy MSA 10580. This includes the entire counties of Albany, Rensselaer, Saratoga, Schenectady, and Schoharie. The Albany-Schenectady-Troy, NY MSA 10580 contains 218 census tracts following the 2010 census changes, of which 11.01 percent are low-income, 16.51 percent are moderate-income, 50.00 percent are middle-income, and 21.56 percent are upper income. Two tracts lack income information and are characterized as NA. This AA meets the requirements of the regulation and does not arbitrarily exclude low-or moderate-income geographies.

According to the 2010 U.S. Census data, the AA had a total population of 870,716. The AA contains 213,800 families, and 20.53 percent are low-income, 18.05 percent are moderate-income, 21.8 percent are middle-income, and 39.62 percent are upper-income. The 2010 median family income was \$74,739 and the 2013 HUD adjusted median family income for the AA is \$78,100. Ten percent of the AA's households fall below the poverty level.

The 2010 U.S. Census data reported 229,151 owner-occupied housing units in the AA. Of all owner-occupied housing, 4.37 percent is located in low-income geographies, 11.32 percent is located in moderate-income geographies, 56.55 percent is located in middle-income geographies, and 27.76 percent is located in upper-income geographies. According to the National Association of Realtors, the median sales price of existing single-family homes in the MSA was \$186,839. According to the above, a low-income individual or family earns less than \$39,000. According to the 2000 U.S. Census data, the median housing cost was \$103,896.

According to the 2011 Business Geodemographic Data, there are 72,006 businesses and 1,952 farms in this AA. Approximately 67 percent of these businesses report revenues less than or equal to \$1 million, and approximately 4 percent report revenues over \$1 million. Another 29 percent did not report revenue. Of all businesses, 7.48 percent are in low-income tracts, 15.81 percent are in moderate-income tracts, 50.41 percent are in middle-income tracts, and 26.27 percent are in upper-income tracts.

The primary industries in the AA are state and local government, restaurants and other eating places, colleges, and general medical and surgical hospitals. The top employers in the area are St. Peter's Health Partners, Albany Medical Center, Golub Corp., General Electric Company, and Bechtel Marine Propulsion Corp.

According to the 2010 U.S. Census, the Albany-Schenectady-Troy MSA unemployment rate was 3.26 percent. According to the Bureau of Labor Statistics, the June 2013 unemployment rate (not seasonally adjusted) was 6.4 percent, below the current 7.5 percent New York state average unemployment rate and the national average 7.4 percent unemployment rate. In June 2013, the unemployment rate for Albany County was 6.4 percent, Rensselaer County was 6.8 percent, Saratoga County was 5.7 percent, Schenectady County was 6.9 percent, and Schoharie County was 7.7 percent.

Trustco operates 55 of its 82 New York branches in this AA. As of June 30, 2012, the bank had \$2.5 billion in deposits in this MSA and is ranked second with a 11.87 percent market share. Banking competition is moderate with 25 FDIC-insured institutions with 317 branch offices operating in the AA. The MSA market is highly concentrated with four institutions holding 65 percent of the AA's deposits. These institutions include KeyBank National Association with a 34.13 percent deposit market share, Trustco Bank, First Niagra Bank, NA with a 10.36 percent deposit market share, and RBS Citizens, NA with a 9.59 percent deposit market share.

Based upon the 2011 HMDA peer mortgage data, Trustco ranked third in one to four-family manufactured housing lending in the area out of 264 lenders with 8.27 percent market share. The top five lenders are Wells Fargo Bank, NA with 11.18 percent market share, SEFCU Services, LLC with 8.32 percent, Trustco, Homestead Funding Corp with 6.58 percent, and Bank of America with 4.41 percent.

A community contact in this AA was made on May 3, 2011 at Better Neighborhoods Inc., a provider of affordable housing, homebuyer education, and foreclosure counseling to low- and moderate-income individuals and areas. The organization services Schenectady County, particularly the City of Schenectady, as well as other distressed and underserved areas of Fulton and Montgomery Counties. Approximately 90 percent of the clients served by the agency are below 80 percent of the MSA median income. The contact expressed concern about the local economic outlook. The real estate market is such that it is difficult for low- and moderate-income individuals to qualify for mortgages. The contact stated that there is a need for mortgage lending for low- and moderate-income individuals, particularly low cost Home Improvement loans due to the age of the housing stock in the area and the need for repairs and updates to old, deteriorating homes. The contact also indicated that it is difficult for low- and moderate-income individuals to obtain small automobile loans that would help them carry out daily activities.

**State of Florida**

**Orlando MSA 36740**

**Orlando Kissimmee**

<b>Demographic Information for Full Scope Area: Orlando Kissimmee</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts/BNAs)	389	2.06	27.25	39.33	31.11	0.26
Population by Geography	2,134,411	1.09	26.67	41.33	30.90	0.01
Owner-Occupied Housing by Geography	505,982	0.48	20.03	43.77	35.71	0.01
Business by Geography	332,457	0.63	23.76	38.63	36.97	0.01
Farms by Geography	7,837	0.64	20.34	46.15	32.75	0.11
Family Distribution by Income Level	521,311	20.08	18.64	20.77	40.51	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	201,865	1.82	39.02	42.17	16.98	0.01
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		58,474 58,200 12%	Median Housing Value Unemployment Rate (2010 US Census)		224,608 4.52%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2013 HUD updated MFI

The Orlando MSA 36740 AA, is comprised of four contiguous counties including Lake County, Orange County, Osceola County, and Seminole County. The Orlando MSA 36740 AA, contains 389 census tracts following the 2010 census changes, of which 2.06 percent are low-income, 27.25 percent are moderate-income, 39.33 percent are middle-income, and 31.11 percent are upper-income. The AA meets the requirements of the regulation and does not arbitrarily exclude low or moderate-income geographies.

According to the 2010 U.S. Census data, the AA had a total population of 2,134,411. The AA contains 521,311 families, and 20.08 percent are low-income, 18.64 percent are moderate-income, 20.77 percent are middle-income and 40.51 percent are upper-income. Twelve percent of households are below the poverty level. The 2010 median family income was \$58,474 and the 2013 HUD updated median family income is \$58,200.

The 2010 U.S. Census data reported 505,982 owner-occupied housing units in the AA. Approximately 0.48 percent of households are located in low-income geographies, 20.03 percent are in moderate-income geographies, 43.77 percent are located in middle-income geographies, and 35.71 percent are located in upper-income geographies.

Based on the housing value and the 2013 HUD updated median family income, there is a lack of affordability for a low-income or moderate-income individual or family to purchase a home. The median housing value is \$224,608, and according to the above, a low-income individual or family earns less than \$29,100 annually. According to the 2000 U.S. Census data, the median housing cost was \$105,369.

According to the 2011 Business Geodemographic Data, there are 332,457 businesses and 7,838 farms in this AA. Approximately 71 percent of the businesses reporting have revenues less than or equal to \$1 million, approximately 2 percent have revenues over \$1 million, and 27 percent of businesses do not report revenue information. Of the businesses, 0.63 percent are located in low-income geographies, 23.76 percent are located in moderate-income geographies, 38.63 percent are located in middle-income geographies, and 36.97 percent are located in upper-income geographies.

The leading industries in this AA are state and local government, restaurants, amusement parks and arcades, and traveler accommodations. The largest employers are Walt Disney World, Co., Wal-Mart Stores, Inc., Universal Orlando Resort, Publix Supermarkets, and Orlando Regional Healthcare System.

According to the 2010 U.S. Census, the Orlando MSA unemployment rate was 4.52 percent. According to the Bureau of Labor Statistics, the June 2013 non-seasonally adjusted unemployment rate was 6.9 percent, which is just below the current 7.1 percent Florida state average unemployment rate and below the national average 7.4 percent unemployment rate.

Trustco operates 45 of its 138 branch offices in Florida; 32 of the 45 (71 percent) Florida branch offices are located in this MSA AA. According to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco ranked 15<sup>th</sup> out of 49 institutions with a 1.06 percent deposit market share in the Orlando MSA. According to the same deposit data, Trustco's major competitors in the Orlando MSA are SunTrust Bank (ranked first with 72 offices and 22.57 percent of deposit market share), Bank of America (second with 66 offices and 18.89 percent), Wells Fargo Bank (third with 57 offices and 17.09 percent), JP Morgan Chase (fourth with 50 offices and 5.27 percent), and Regions Bank (fifth with 51 offices and 4.6 percent).

The 2011 Peer Mortgage data indicates Trustco is ranked 52nd out of mortgage lenders in the AA with a market share of 0.30 percent by loan count and .25 percent by total dollar amount.

As part of a previous examination in the Orlando-Deltona-Daytona Beach MSA, a community contact was made on March 9, 2012 at the Orlando Neighborhood Improvement Corp (ONIC). The ONIC is an organization that builds affordable homes and works to meet the need for affordable and mixed-income housing in Central Florida. The company is a full-service non-profit housing developer that specializes in rental housing, both new construction, and rehabilitation. The contact indicated that support from local banking institutions is strong in helping to fund housing development projects.

**State of Massachusetts**

**Berkshire County MSA 38340 AA**

**Pittsfield MA MSA Berkshire Co**

Demographic Information for Full Scope Area: Pittsfield MA MSA Berkshire Co						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	39	2.56	10.26	66.67	20.51	0.00
Population by Geography	131,219	2.58	10.63	66.83	19.95	0.00
Owner-Occupied Housing by Geography	38,332	0.63	6.91	69.52	22.94	0.00
Business by Geography	13,388	7.55	8.14	62.65	21.65	0.00
Farms by Geography	404	0.74	6.68	68.56	24.01	0.00
Family Distribution by Income Level	33,202	21.78	17.02	22.60	38.61	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,882	3.70	16.88	67.44	11.99	0.00
<b>Median Family Income</b>		<b>64,783</b>	<b>Median Housing Value</b>		<b>227,331</b>	
<b>HUD Adjusted Median Family Income for 2013</b>		<b>69,800</b>	<b>Unemployment Rate (2010 US Census)</b>		<b>3.93%</b>	
<b>Households Below Poverty Level</b>		<b>12%</b>				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2010 US Census and 2013 HUD updated MFI

Trustco’s Pittsfield, MA MSA 38340 AA consists of all census tracts in Berkshire County. The bank designated all of Berkshire County, the only county in the Pittsfield, MA MSA 38340, as its AA. Berkshire County is the only county in Massachusetts in which Trustco conducts business. The Pittsfield, MA MSA 38340 AA is comprised of 39 census tracts following the 2010 census changes, of which 2.56 percent are low-income, 10.26 percent are moderate-income, 66.67 percent are middle-income, and 20.51 percent are upper-income. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

According to the 2010 U.S. Census data, the Pittsfield, MA MSA 38340 AA had a total population of 131,219. The AA contains 33,202 families, and 21.78 percent are low-income, 17.02 percent are moderate-income, 22.60 percent are middle-income, and 38.61 percent are upper-income. The 2010 median family income was \$64,783 and the 2013 HUD adjusted median family income is \$69,800. In the AA, 12 percent of households call below the poverty level.

The 2010 U.S. Census data reported 38,332 owner-occupied housing units in the AA. Of all owner-occupied housing, 0.63 percent is located in low-income geographies, 6.91 percent is located in moderate-income geographies, 69.52 percent is located in middle-income geographies, and 22.94 percent is located in upper-income geographies. The median housing value is \$227,331. A low-income individual or household in the AA would make under \$34,900 annually. According to the 2000 U.S. Census data, the median housing cost was \$124,145.

Pittsfield’s economic recovery quickened in 2012 but still trails recovery in Massachusetts and the Northeast. According to 2011 Business Geodemographic Data, there are 13,388 businesses and 404 farms in this AA. Approximately 68 percent of the businesses reporting have revenues less than or equal

to \$1 million, approximately 4 percent of businesses reporting have revenues greater than \$1 million, and 28 percent did not report revenue information. Of the businesses, 7.55 percent are located in low-income geographies, 8.14 percent are in moderate-income geographies, 62.65 percent are in middle-income geographies, and 21.65 percent are in upper-income geographies.

The primary industry sectors in Pittsfield are state and local government, restaurants, general medical and surgery hospitals, and grocery stores. Top employers include B Mango & Bird, Berkshire Medical Center, BMC Hillcrest Campus, Canyon Ranch in Lenox, and Jimmy Peak Mountain Resort.

According to the 2010 U.S. Census, the AA's unemployment rate was 3.93 percent. According to the Bureau of Labor Statistics, the June 30, 2013 non-seasonally adjusted unemployment rate for the Pittsfield, MA MSA 38340 AA was 7.5 percent, which is higher than the Massachusetts state average unemployment rate of 7.0 percent and on par with the 7.4 percent national average.

Trustco operates four of its 138 branch offices in this AA (2.9 percent). Competition for both loans and deposits is strong in this AA, and Trustco has a limited presence relative to other financial institutions. According to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco ranked last out of 11 institutions in the AA with 0.83 percent of the deposit market share. According to the same deposit date, Trustco's major competitors in the Pittsfield, MA MSA 38340 AA are Berkshire Bank (first with 20 branches and 42.47 percent of deposit market share), TD Bank (second with 7 branches and 13.24 percent), Hoosac Bank (third with 3 branches and 12.07 percent), Adams Community Bank (fourth with 7 branches and 10.54 percent), and The Pittsfield Co-operative Bank (fifth with 4 branches and 6.21 percent).

The 2011 Peer Mortgage Data indicates Trustco ranked 16<sup>th</sup> out of 82 mortgage lenders with a market share of 1.2 percent. The top five lenders are Greylock Federal Credit Union (21.76 percent market share), Berkshire Bank (9.68 percent market share), Lee Bank (7.46 percent market share), Adams Co-operative Bank (4.88 percent market share), and Wells Fargo Bank (4.16 percent market share).

As part of this examination in the Berkshire County MSA, a community contact interview was conducted on August 22, 2013 at the Habit for Humanity Central Berkshire. Habit for Humanity is an organization that builds affordable homes and works to meet the need of these families in the Berkshire area. The company is a full-service non-profit help families in the Central Berkshires of Massachusetts own their own home, a secure place that will give them a boost to improve their lives. The contact indicated that support from local banking institutions is good in volunteering to help with projects, but more could be done in terms of funding affordable housing.

**State of Vermont**

**Bennington County Non-MSA AA**

**Non-MSA VT Bennington Co**

Demographic Information for Full Scope Area: Non-MSA VT Bennington Co.						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	25.00	58.33	16.67	0.00
Population by Geography	37,125	0.00	22.78	59.92	17.30	0.00
Owner-Occupied Housing by Geography	11,291	0.00	17.85	61.43	20.72	0.00
Business by Geography	4,400	0.00	21.73	49.50	28.77	0.00
Farms by Geography	189	0.00	15.87	60.32	23.81	0.00
Family Distribution by Income Level	10,060	18.77	19.57	21.53	40.13	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,857	0.00	34.46	53.25	12.29	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		60,519 63,800 11%	Median Housing Value Unemployment Rate (2010 US Census)		242,709 3.27%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2013 HUD updated MFI

Trustco’s Bennington County AA is a Non-MSA in Vermont, consisting of all census tracts in Bennington County. Bennington County is the only county in Vermont in which Trustco conducts business. The non-MSA AA is comprised of 12 census tracts, of which 25 percent are moderate-income, 58.33 percent are middle-income, and 16.67 percent are upper-income. There are no low-income census tracts in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

According to the 2010 U.S. Census data, the AA had a total population of 37,125. The AA contains 10,060 families, and 18.77 percent are low-income, 19.57 percent are moderate-income, 21.53 percent are middle-income, and 40.13 percent are upper-income. The 2010 median family income was \$60,519 and the 2013 HUD adjusted median family income is \$63,800. Approximately 11 percent of households live below the poverty level.

The 2010 U.S. Census reported 11,291 owner-occupied housing units in the non-MSA AA. Of all owner-occupied housing, 17.85 percent is located in moderate-income geographies, 61.43 percent is located in middle-income geographies, and 20.72 percent is located in upper-income geographies. The median housing cost was \$242,709 in 2010. According to the above, a low-income individual or family earns less than \$31,900, indicating a lack of affordability for a low-income individual or family to purchase a home. According to the 2000 U.S. Census data, the median housing cost was \$129,842.

According to the 2011 Business Geodemographic Data, there are 4,400 businesses and 189 farms located in this AA. Approximately 71 percent of the businesses reporting have revenues less than or equal to \$1 million, approximately 3 percent of businesses reporting have revenues greater than \$1 million, and 26 percent of businesses did not report revenue information. Of the businesses located in the AA, 21.73 percent are located in moderate-income geographies, 49.5 percent are located in middle-income geographies, and 28.77 percent are located in upper-income geographies.

The primary industries in Vermont are educational and health services, state and local government, retail trade, and manufacturing. Some of the major employers include IBM Corp., Fletcher Allen Health Care, University of Vermont, Green Mountain Coffee Roasters, Inc., and Shaw's Supermarkets, Inc.

According to the 2010 U.S. Census, the unemployment rate in the Bennington County non-MSA was 3.27 percent. However, according to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the county was 5.6 percent (period of May 2012 through June 2013). This is higher than the June 30, 2013 unemployment rate in Vermont of 4.4 percent, yet lower than the 7.4 percent national rate.

Trustco operates one of its 138 branches in Vermont, within Bennington County. Competition for both loans and deposits is moderate in this AA; according to the June 30, 2012 FDIC Summary of Deposit Market Share report, Trustco ranked last out of 7 institutions with 1.14 percent of the deposit market share. According to the same deposit data, Trustco's major competitors in the Bennington County non-MSA are The Bank of Bennington (first with four branches and 25.1 percent deposit market share), Berkshire Bank (second with four branches and 23.9 percent), TD Bank (third with two branches and 14.7 percent), People's United Bank (fourth with three branches and 13.4 percent share), and Merchants Bank (fifth with three branches and 10.8 percent market share).

The 2011 Peer Mortgage Data indicates Trustco ranked 21st out of 49 mortgage lenders with a market share of 1.01 percent. The top five lenders were Wells Fargo Bank (12.32 percent share), JP Morgan Chase Bank (7.8 percent share), Bank of America (7.6 percent share), People's United Bank (6.98 percent share), and Quicken Loans (5.24 percent share).

As part of this examination in the Bennington Vermont Non-MSA, a community contact was made on August 15, 2013 at the Shires Housing formerly known as the regional affordable housing corporation. Shires housing is an organization that offers affordable homes and works to meet the needs for low-income families in Vermont. Shires Housing's mission is to provide safe, decent and perpetually affordable housing options for limited income residents of Bennington. The contact indicated that support from local financial institutions was lacking and more needed to be done to fund affordable housing in the area. The contact also noted banks should focus on more smaller grants to organizations instead of a few larger grants.

## Appendix D: Tables of Performance Data

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### 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 the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and percent Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

**Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

**Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

**Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Loans to Businesses** - 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. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

**Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

**Table 8. Borrower Distribution of Home Purchase Loans** - 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/AA. The table also presents market share information based on the most recent aggregate market data available.

**Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.

**Table 10. Borrower Distribution of Refinance Loans** - See Table 8.

**Table 11. Borrower Distribution of Small Loans to Businesses** - 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. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms 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 farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 households within each geography. For borrower distribution, the table 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 of households by income level in each MA/AA.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

Multistate Metropolitan Area Rating

New York-Wayne-White Plains, NY-NJ Metropolitan District (MD) 35644

Institution ID: TRUSTCO BK (10000707635)

(Included)  
Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE AA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA (2011):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Trustco Multistate AA 2011	100.00	68	21,701	4	1,425	0	0	0	0	72	23,126	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.  
 \*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: MULTISTATE AA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA (2011):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Trustco Multistate AA 2011	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Institution ID: TRUSTCO BK (10000707635) (Included)**

**Table 1. Other Products**

LENDING VOLUME		Geography: MULTISTATE AA		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
AA (2011):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
Trustco Multistate AA 2011	0	0	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

(Included)

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE 31, 2011			Geography: MULTISTATE AA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER					
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	29	100.00	0.22	0.00	1.09	0.00	10.58	34.48	88.11	65.52	0.22	1.26	11.09	87.44

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

(Included)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE AA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ***	% BANK Loans****	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	1	100.00	0.22	0.00	1.09	0.00	10.58	0.00	88.11	100.00	0.18	0.89	8.53	90.40

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

(Included)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MULTISTATE AA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	38	100.00	0.22	0.00	1.09	2.63	10.58	7.89	88.11	89.47	0.12	0.45	7.31	92.12

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BK (10000707635) (Included)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE AA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% of MF Units**	% BANK Loans***	% MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	0	0.00	2.16	0.00	10.26	0.00	29.53	0.00	58.06	0.00	0.42	5.46	31.93	62.18

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE AA					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	4	100.00	0.85	0.00	4.35	25.00	16.50	0.00	78.29	75.00	0.69	3.09	15.27	80.95

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Institution ID: TRUSTCO BK (10000707635) (Included)

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MULTISTATE AA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				Aggregate Lending (%) by Tract Income			
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans				
<b>Full Review:</b>														
Trustco Multistate AA 2011	0	0.00	0.48	0.00	2.18	0.00	14.01	0.00	83.32	0.00	0.00	3.70	14.81	81.48

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Institution ID: TRUSTCO BK (10000707635) (Included)

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: MULTISTATE AA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>3</sup>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	29	100.00	10.96	0.00	10.38	3.45	14.83	13.79	63.83	82.76	0.62	4.90	18.08	76.39

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BK (10000707635)

(Included)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATE AA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>4</sub>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	1	100.00	10.96	0.00	10.38	0.00	14.83	0.00	63.83	100.00	2.06	6.67	13.97	77.29

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATE AA					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>5</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Trustco Multistate AA 2011	38	100.00	10.96	0.00	10.38	13.16	14.83	13.16	63.83	73.68	1.16	3.73	12.63	82.49

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BK (10000707635) (Included)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE AA			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Trustco Multistate AA 2011	4	100.00	68.88	50.00	0.00	25.00	75.00	63,872	23,074

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\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATE AA			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Trustco Multistate AA 2011	0	0.00	96.08	0.00	0.00	0.00	0.00	58	15

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MULTISTATE AA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Trustco Multistate AA 2011	0	0	5	39	5	39	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		Geography: MULTISTATE AA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Deposits	Branches						Branch Openings/Closings						Population											
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography											
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp								
<b>Full Review:</b>																									
Trustco Multistate AA 2011	100%	16	100%	0.00	0.00	25%	75%	0	0	0	0	0	0	1.25	4.45	18.35	75.95								

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM				Geography: MULTISTATE AA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011									
AA:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																	
Trustco Multistate AA 2011	100%	16	100%	0	0	25%	75%	12	146	0	0	3	9	1.25	4.45	18.35	75.95

**Institution ID: TRUSTCO BK (10000707635) (Included)**

**Trustco Multistate AA 2011**

Demographic Information for Full Scope Area: Trustco Multistate AA 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	442	1.36	5.20	18.10	74.43	0.90
Population by Geography	2,094,330	1.25	4.45	18.35	75.95	0.00
Owner-Occupied Housing by Geography	491,463	0.22	1.09	10.58	88.11	0.00
Business by Geography	238,718	0.85	4.35	16.50	78.29	0.02
Farms by Geography	3,754	0.48	2.18	14.01	83.32	0.00
Family Distribution by Income Level	544,975	10.96	10.38	14.83	63.83	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	116,267	3.39	10.66	29.84	56.11	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		49,461 67,400 7%	Median Housing Value Unemployment Rate (2000 US Census)		264,381 2.07%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

## Multistate Metropolitan Area Rating

### New York-Wayne-White Plains, NY-NJ Multistate Metropolitan District (MD) 35644

Institution ID: TRUSTCO BK (10000707635)

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE NY NJ AA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Multistate NY and NJ	100.00	168	51,355	11	3,841	0	0	1	500	180	55,696	100.00

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TRUSTCO BK (10000707635)

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 MULTISTATE NY NJ								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Multistate NY and NJ	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2013 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 MULTISTATE NY NJ		Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013	
	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>AA (2012):</b>					
<b>Full Review:</b>					
Multistate NY and NJ	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2013 to June 30, 2013.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	73	100.00	0.23	4.11	2.03	4.11	16.48	24.66	81.26	67.12	0.34	1.87	15.09	82.70

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BK (10000707635)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	1	100.00	0.23	0.00	2.03	0.00	16.48	0.00	81.26	100.00	0.06	1.56	12.57	85.81

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013					
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	94	100.00	0.23	1.06	2.03	0.00	16.48	14.89	81.26	84.04	0.12	0.84	10.96	88.07

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BK (10000707635)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	0	0.00	2.30	0.00	12.95	0.00	36.34	0.00	48.41	0.00	2.76	15.95	36.81	44.48

\* Based on

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses* **	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	11	100.00	1.07	0.00	6.09	36.36	21.13	9.09	71.66	54.55	1.30	4.58	21.04	73.08

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: 2012 MULTISTATE NY NJ				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				Aggregate Lending (%) by Tract Income			
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans				
<b>Full Review:</b>														
Multistate NY and NJ	0	0.00	0.47	0.00	4.59	0.00	16.83	0.00	78.08	0.00	0.00	8.89	6.67	84.44

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>6</sup>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	73	100.00	12.44	0.00	10.63	4.11	14.56	17.81	62.37	78.08	0.61	5.26	17.87	76.26

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>6</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>7</sub>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	1	100.00	12.44	0.00	10.63	0.00	14.56	0.00	62.37	100.00	2.43	7.90	15.07	74.61

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

7 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>8</sub>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Multistate NY and NJ	94	100.00	12.44	0.00	10.63	3.19	14.56	13.83	62.37	82.98	1.33	3.81	12.43	82.42

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BK (10000707635)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012 MULTISTATE NY NJ			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Multistate NY and NJ	11	100.00	73.14	36.36	27.27	0.00	72.73	65,148	25,075

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2012).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: 2012 MULTISTATE NY NJ			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Multistate NY and NJ	0	0.00	96.31	0.00	0.00	0.00	0.00	46	14

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2012).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: 2012 MULTISTATE NY NJ				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013			
AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Multistate NY and NJ	5	39	13	72	18	111	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: 2012 MULTISTATE NY NJ				Evaluation Period:					
JANUARY 1, 2012 TO JUNE 30, 2013																	
AA:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Multistate NY and NJ	100%	16	100%	0.00	0.00	25%	75%	0	0	0	0	0	0	1.67	6.68	23.00	68.38

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM		Geography: 2012 MULTISTATE NY NJ						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013									
AA:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Multistate NY and NJ	100%	16	100%	0	0	25%	75%	12	146	0	0	3	9	1.67	6.68	23.00	68.38

Institution ID: TRUSTCO BK (10000707635)

**Multistate NY and NJ**

Demographic Information for Full Scope Area: Multistate NY and NJ						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	467	1.93	6.64	22.91	67.24	1.28
Population by Geography	2,165,916	1.67	6.68	23.00	68.38	0.28
Owner-Occupied Housing by Geography	511,305	0.23	2.03	16.48	81.26	0.00
Business by Geography	229,409	1.07	6.09	21.13	71.66	0.05
Farms by Geography	3,791	0.47	4.59	16.83	78.08	0.03
Family Distribution by Income Level	548,686	12.44	10.63	14.56	62.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	126,555	4.11	14.75	34.16	46.98	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,171 68,300 7%	Median Housing Value Unemployment Rate (2010 US Census)		507,493 3.09%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 010 US Census and 2012 HUD updated MFI

## State of New York

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 1. Lending Volume

LENDING VOLUME		Geography: REVISED 2011 NYSTATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA (2011):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2011 10580 Albany	84.27	1,954	321,284	141	36,834	0	0	0	0	2,095	358,118	87.78%
<b>Limited Review:</b>												
2011 24020 Warren	8.81	212	29,425	7	735	0	0	0	0	219	30,160	4.53%
2011 28740 Ulster	0.68	17	3,757	0	0	0	0	0	0	17	3,757	.35%
2011 39100 Orange	2.78	68	17,206	1	7	0	0	0	0	69	17,213	3.11%
2011 NonMSA Columbia	3.46	82	12,268	4	285	0	0	0	0	86	12,553	4.23%

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 1. Other Products

LENDING VOLUME		Geography: REVISED 2011 NYSTATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA (2011):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2011 10580 Albany	0.00	0	0	0	0	0	0	0	0	0	0	0	0	87.78%
<b>Limited Review:</b>														
2011 24020 Warren	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.53%
2011 28740 Ulster	0.00	0	0	0	0	0	0	0	0	0	0	0	0	.35%
2011 39100 Orange	0.00	0	0	0	0	0	0	0	0	0	0	0	0	3.11%
2011 NonMSA Columbia	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.23%

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 1. Other Products**

LENDING VOLUME		Geography: REVISED 2011 NYSTATE		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
AA (2011):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2011 10580 Albany	0	0	0	0	0
<b>Limited Review:</b>					
2011 24020 Warren	0	0	0	0	0
2011 28740 Ulster	0	0	0	0	0
2011 39100 Orange	0	0	0	0	0
2011 NonMSA Columbia	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: REVISED 2011 NYSTATE					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 10580 Albany	707	85.08	2.78	2.55	13.35	11.03	53.66	50.64	30.21	35.79	2.37	11.15	54.12	32.36
<b>Limited Review:</b>														
2011 24020 Warren	63	7.58	0.00	0.00	7.87	4.76	76.58	71.43	15.56	23.81	0.00	9.13	72.95	17.92
2011 28740 Ulster	6	0.72	0.00	0.00	8.34	0.00	76.90	83.33	14.76	16.67	0.00	8.81	74.11	17.09
2011 39100 Orange	32	3.85	2.07	15.63	8.38	0.00	66.59	65.63	22.96	18.75	5.28	8.68	62.01	24.04
2011 NonMSA Columbia	23	2.77	0.00	0.00	3.24	4.35	57.23	78.26	39.52	17.39	0.00	3.56	58.56	37.89

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 NYSTATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 10580 Albany	54	81.82	2.78	1.85	13.35	5.56	53.66	48.15	30.21	44.44	2.21	13.62	54.21	29.96
<b>Limited Review:</b>														
2011 24020 Warren	7	10.61	0.00	0.00	7.87	14.29	76.58	71.43	15.56	14.29	0.00	8.39	76.77	14.84
2011 28740 Ulster	0	0.00	0.00	0.00	8.34	0.00	76.90	0.00	14.76	0.00	0.00	5.28	81.37	13.35
2011 39100 Orange	2	3.03	2.07	0.00	8.38	0.00	66.59	0.00	22.96	100.00	2.03	7.80	68.14	22.03
2011 NonMSA Columbia	3	4.55	0.00	0.00	3.24	0.00	57.23	100.00	39.52	0.00	0.00	2.42	68.48	29.09

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2011			Geography: REVISED 2011 NYSTATE								Evaluation Period: JANUARY 1, 2011 TO			
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 10580 Albany	1,186	83.00	2.78	1.94	13.35	6.49	53.66	52.11	30.21	39.46	1.37	8.10	53.06	37.46
<b>Limited Review:</b>														
2011 24020 Warren	142	9.94	0.00	0.00	7.87	5.63	76.58	71.83	15.56	22.54	0.00	7.23	72.92	19.84
2011 28740 Ulster	11	0.77	0.00	0.00	8.34	0.00	76.90	72.73	14.76	27.27	0.00	6.28	74.59	19.13
2011 39100 Orange	34	2.38	2.07	20.59	8.38	2.94	66.59	47.06	22.96	29.41	1.47	5.43	63.43	29.67
2011 NonMSA Columbia	56	3.92	0.00	0.00	3.24	12.50	57.23	53.57	39.52	33.93	0.00	2.70	55.08	42.22

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: REVISED 2011 NYSTATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 10580 Albany	7	100.00	18.98	0.00	14.82	14.29	46.89	85.71	19.32	0.00	20.65	23.91	38.04	17.39
<b>Limited Review:</b>														
2011 24020 Warren	0	0.00	0.00	0.00	29.96	0.00	38.04	0.00	32.00	0.00	0.00	57.14	42.86	0.00
2011 28740 Ulster	0	0.00	0.00	0.00	30.39	0.00	63.99	0.00	5.62	0.00	0.00	20.00	60.00	20.00
2011 39100 Orange	0	0.00	15.63	0.00	20.85	0.00	59.37	0.00	4.16	0.00	13.33	16.67	63.33	6.67
2011 NonMSA Columbia	0	0.00	0.00	0.00	25.48	0.00	55.56	0.00	18.96	0.00	0.00	25.00	25.00	50.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011			Geography: REVISED 2011 NYSTATE						Evaluation Period: JANUARY 1, 2011 TO					
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 10580 Albany	141	92.16	9.96	12.77	12.72	12.77	49.23	45.39	28.08	29.08	7.90	12.19	48.66	31.25
<b>Limited Review:</b>														
2011 24020 Warren	7	4.58	0.00	0.00	11.84	14.29	68.01	57.14	20.15	28.57	0.00	11.00	64.66	24.34
2011 28740 Ulster	0	0.00	0.00	0.00	10.70	0.00	74.98	0.00	14.32	0.00	0.00	9.36	72.89	17.75
2011 39100 Orange	1	0.65	7.60	0.00	10.86	0.00	61.92	0.00	19.61	100.00	10.31	9.58	55.16	24.95
2011 NonMSA Columbia	4	2.61	0.00	0.00	8.28	0.00	55.76	100.00	35.94	0.00	0.00	8.62	51.33	40.06

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: REVISED 2011 NYSTATE				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				Aggregate Lending (%) by Tract Income			
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans				
<b>Full Review:</b>														
2011 10580 Albany	0	0.00	1.34	0.00	13.68	0.00	59.16	0.00	25.82	0.00	0.00	29.41	50.98	19.61
<b>Limited Review:</b>														
2011 24020 Warren	0	0.00	0.00	0.00	2.47	0.00	89.40	0.00	8.13	0.00	0.00	0.00	100.0	0.00
2011 28740 Ulster	0	0.00	0.00	0.00	5.45	0.00	73.39	0.00	21.16	0.00	0.00	0.00	70.59	29.41
2011 39100 Orange	0	0.00	0.82	0.00	7.34	0.00	65.42	0.00	26.43	0.00	0.00	0.00	45.24	54.76
2011 NonMSA Columbia	0	0.00	0.00	0.00	1.12	0.00	52.60	0.00	46.28	0.00	0.00	4.55	54.55	40.91

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: REVISED 2011 NYSTATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>9</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 10580 Albany	707	85.08	19.23	8.75	18.71	22.96	23.17	28.69	38.88	39.60	9.46	28.58	29.08	32.88
<b>Limited Review:</b>														
2011 24020 Warren	63	7.58	17.50	8.06	19.41	27.42	24.45	22.58	38.65	41.94	6.67	29.81	24.38	39.14
2011 28740 Ulster	6	0.72	19.23	0.00	18.20	20.00	23.74	40.00	38.83	40.00	4.40	25.93	26.60	43.06
2011 39100 Orange	32	3.85	19.14	6.45	18.04	6.45	24.40	38.71	38.41	48.39	7.00	25.45	34.34	33.21
2011 NonMSA Columbia	23	2.77	14.99	0.00	17.46	26.09	21.68	21.74	45.87	52.17	3.28	15.41	29.49	51.82

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by BANK.

<sup>9</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 NYSTATE					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>10</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 10580 Albany	54	81.82	19.23	11.11	18.71	29.63	23.17	29.63	38.88	29.63	10.73	25.23	26.89	37.16
<b>Limited Review:</b>														
2011 24020 Warren	7	10.61	17.50	0.00	19.41	28.57	24.45	42.86	38.65	28.57	9.87	22.70	29.61	37.83
2011 28740 Ulster	0	0.00	19.23	0.00	18.20	0.00	23.74	0.00	38.83	0.00	15.92	29.30	22.93	31.85
2011 39100 Orange	2	3.03	19.14	0.00	18.04	0.00	24.40	0.00	38.41	100.00	13.55	23.71	29.23	33.51
2011 NonMSA Columbia	3	4.55	14.99	0.00	17.46	33.33	21.68	33.33	45.87	33.33	9.55	15.29	29.30	45.86

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

10 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: REVISED 2011 NYSTATE					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				Aggregate Lending Data			
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>11</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****				
<b>Full Review:</b>														
2011 10580 Albany	1,186	83.00	19.23	6.17	18.71	21.10	23.17	30.45	38.88	42.28	6.42	20.28	29.60	43.70
<b>Limited Review:</b>														
2011 24020 Warren	142	9.94	17.50	6.34	19.41	19.72	24.45	25.35	38.65	48.59	5.23	17.66	28.82	48.30
2011 28740 Ulster	11	0.77	19.23	0.00	18.20	9.09	23.74	27.27	38.83	63.64	7.48	17.78	26.57	48.16
2011 39100 Orange	34	2.38	19.14	8.82	18.04	14.71	24.40	17.65	38.41	58.82	5.39	19.60	30.40	44.60
2011 NonMSA Columbia	56	3.92	14.99	7.14	17.46	8.93	21.68	23.21	45.87	60.71	2.17	8.70	24.46	64.67

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.4% of loans originated and purchased by BANK.

11 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES TO DECEMBER 31, 2011		Geography: REVISED 2011 NYSTATE			Evaluation Period: JANUARY 1, 2011				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 10580 Albany	141	92.16	66.79	51.06	40.43	25.53	34.04	13,033	4,289
<b>Limited Review:</b>									
2011 24020 Warren	7	4.58	69.95	71.43	71.43	14.29	14.29	1,916	720
2011 28740 Ulster	0	0.00	70.04	0.00	0.00	0.00	0.00	3,003	1,112
2011 39100 Orange	1	0.65	68.85	100.00	100.00	0.00	0.00	6,362	2,271
2011 NonMSA Columbia	4	2.61	68.63	0.00	100.00	0.00	0.00	1,919	598

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2011		Geography: REVISED 2011 NYSTATE				Evaluation Period: JANUARY 1, 2011 TO			
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 10580 Albany	0	0.00	97.79	0.00	0.00	0.00	0.00	52	22
<b>Limited Review:</b>									
2011 24020 Warren	0	0.00	98.06	0.00	0.00	0.00	0.00	26	12
2011 28740 Ulster	0	0.00	97.19	0.00	0.00	0.00	0.00	18	5
2011 39100 Orange	0	0.00	96.52	0.00	0.00	0.00	0.00	43	10
2011 NonMSA Columbia	0	0.00	97.96	0.00	0.00	0.00	0.00	25	12

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&amp;B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: REVISED 2011 NYSTATE				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
2011 10580 Albany	0	0	31	449	31	449	0.00	0	0	
<b>Limited Review:</b>										
2011 24020 Warren	0	0	2	13	2	13	0.00	0	0	
2011 28740 Ulster	0	0	0	0	0	0	0.00	0	0	
2011 39100 Orange	0	0	0	0	0	0	0.00	0	0	
2011 NonMSA Columbia	0	0	2	3	2	3	0.00	0	0	

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2011 TO DECEMBER 31, 2011								Geography: REVISED 2011 NYSTATE				Evaluation Period:					
AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2011 10580 Albany	87.78%	55	76.4%	9.1%	9.1%	52.7%	29.1%	2	0	0	0	1	1	7.34	16.25	50.39	25.85
<b>Limited Review:</b>																	
2011 24020 Warren Washington	4.53%	5	6.9%	0.00	0.00	100%	0.00	0	0	0	0	0	0	0.00	10.39	74.77	14.84
2011 28740 Ulster	.35%	2	1.46%	0.00	50%	50%	0.00	1	0	0	1	0	0	0.00	11.46	75.10	13.44
2011 39100 Orange Dutchess	3.11%	5	6.9%	0.00	20%	60%	20%	0	0	0	0	0	0	7.18	11.97	62.07	18.75
2011 NonMSA Columbia Greene	4.23%	5	6.9%	0.00	0.00	60%	40%	0	0	0	0	0	0	0.00	6.76	55.30	36.32

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM DECEMBER 31, 2011				Geography: REVISED 2011 NYSTATE				Evaluation Period: JANUARY 1, 2011 TO									
AA:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2011 10580 Albany	87.78%	55	76.4%	9.1%	9.1%	52.7%	29.1%	0	146	5	5	31	21	7.34	16.25	50.39	25.85
<b>Limited Review:</b>																	
2011 24020 Warren	4.53%	5	6.9%	0.00	0.00	100%	0.00	0	146	0	0	5	0	0.00	10.39	74.77	14.84
2011 28740 Ulster	.35%	2	1.46%	0.00	50%	50%	0.00	0	146	0	1	1	0	0.00	11.46	75.10	13.44
2011 39100 Orange	3.11%	5	6.9%	0.00	20%	60%	20%	0	146	0	1	3	1	7.18	11.97	62.07	18.75
2011 NonMSA Columbia	4.23%	5	6.9%	0.00	0.00	60%	40%	0	146	0	0	3	2	0.00	6.76	55.30	36.32

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 10580 Albany**

Demographic Information for Full Scope Area: 2011 10580 Albany						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	214	9.35	20.09	48.13	21.50	0.93
Population by Geography	825,875	7.34	16.25	50.39	25.85	0.17
Owner-Occupied Housing by Geography	212,783	2.78	13.35	53.66	30.21	0.00
Business by Geography	74,422	9.96	12.72	49.23	28.08	0.02
Farms by Geography	1,944	1.34	13.68	59.16	25.82	0.00
Family Distribution by Income Level	211,016	19.23	18.71	23.17	38.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	80,070	11.40	23.88	49.02	15.70	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		54,944 77,000 9%	Median Housing Value Unemployment Rate (2000 US Census)		103,896 2.94%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 NonMSA Columbia**

Demographic Information for Limited Scope Area: 2011 NonMSA Columbia						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0.00	6.45	51.61	38.71	3.23
Population by Geography	111,289	0.00	6.76	55.30	36.32	1.62
Owner-Occupied Housing by Geography	30,671	0.00	3.24	57.23	39.52	0.00
Business by Geography	10,417	0.00	8.28	55.76	35.94	0.01
Farms by Geography	538	0.00	1.12	52.60	46.28	0.00
Family Distribution by Income Level	28,754	14.99	17.46	21.68	45.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	9,330	0.00	9.85	60.42	29.73	0.00
Median Family Income	41,761	Median Housing Value	103,842			
HUD Adjusted Median Family Income for 2011	56,100	Unemployment Rate (2000 US Census)	2.39%			
Households Below Poverty Level	10%					

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 39100 Orange**

Demographic Information for Limited Scope Area: 2011 39100 Orange						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	133	7.52	15.79	58.65	16.54	1.50
Population by Geography	621,517	7.18	11.97	62.07	18.75	0.04
Owner-Occupied Housing by Geography	145,576	2.07	8.38	66.59	22.96	0.00
Business by Geography	58,449	7.60	10.86	61.92	19.61	0.01
Farms by Geography	1,839	0.82	7.34	65.42	26.43	0.00
Family Distribution by Income Level	154,804	19.14	18.04	24.40	38.41	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	57,563	12.10	18.04	57.97	11.89	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		61,652 86,100 8%	Median Housing Value Unemployment Rate (2000 US Census)	147,062 2.60%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID:** TRUSTCO BANK (10000707635) (Included)

**2011 28740 Ulster**

Demographic Information for Limited Scope Area: 2011 28740 Ulster						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	49	0.00	14.29	71.43	14.29	0.00
Population by Geography	177,749	0.00	11.46	75.10	13.44	0.00
Owner-Occupied Housing by Geography	45,916	0.00	8.34	76.90	14.76	0.00
Business by Geography	17,437	0.00	10.70	74.98	14.32	0.00
Farms by Geography	605	0.00	5.45	73.39	21.16	0.00
Family Distribution by Income Level	43,790	19.23	18.20	23.74	38.83	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,393	0.00	16.69	73.68	9.63	0.00
Median Family Income		51,753	Median Housing Value		111,549	
HUD Adjusted Median Family Income for 2011		72,900	Unemployment Rate (2000 US		3.16%	
Households Below Poverty Level		10%	Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2000 US Census and 2011 HUD updated MFI.

**Institution ID:** TRUSTCO BANK (10000707635) (Included)

**2011 24020 Warren**

Demographic Information for Limited Scope Area: 2011 24020 Warren						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	33	0.00	12.12	78.79	9.09	0.00
Population by Geography	124,345	0.00	10.39	74.77	14.84	0.00
Owner-Occupied Housing by Geography	34,670	0.00	7.87	76.58	15.56	0.00
Business by Geography	11,838	0.00	11.84	68.01	20.15	0.00
Farms by Geography	566	0.00	2.47	89.40	8.13	0.00
Family Distribution by Income Level	33,048	17.50	19.41	24.45	38.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,196	0.00	14.37	74.46	11.17	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		45,141 61,800 9%	Median Housing Value Unemployment Rate (2000 US Census)	91,276 2.50%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

# State of New York

**Institution ID:** TRUSTCO BK (10000707635)

**Table 1. Lending Volume**

LENDING VOLUME		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
10580 MSA Albany Full	83.74	3,898	657,367	211	58,223	0	0	31	5,624	4,140	721,214	87.78%
<b>Limited Review:</b>												
24020 MSA Warren	8.19	398	58,406	4	560	0	0	1	40	403	59,106	4.53%
28740 MSA Ulster	0.55	27	5,830	0	0	0	0	0	0	27	5,830	.35%
39100 MSA Orange	2.69	132	29,715	0	0	0	0	0	0	132	29,715	3.11%
NonMSA NY Columbia Greene	4.83	229	36,190	8	1,190	0	0	0	0	237	37,380	4.23%

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 NEW YORK STATE								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
10580 MSA Albany Full	0.00	0	0	0	0	0	0	0	0	0	0	0	0	87.78%
<b>Limited Review:</b>														
24020 MSA Warren	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.53%
28740 MSA Ulster	0.00	0	0	0	0	0	0	0	0	0	0	0	0	.35%
39100 MSA Orange	0.00	0	0	0	0	0	0	0	0	0	0	0	0	3.11%
NonMSA NY Columbia Greene	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.23%

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2013 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 NEW YORK STATE		Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013	
AA (2012):	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
10580 MSA Albany Full	0	0	0	0	
<b>Limited Review:</b>					
24020 MSA Warren	0	0	0	0	
28740 MSA Ulster	0	0	0	0	
39100 MSA Orange	0	0	0	0	
NonMSA NY Columbia Greene	0	0	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2013 to June 30, 2013.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	746	77.31	4.37	5.76	11.32	9.79	56.55	51.74	27.76	32.71	3.08	9.88	55.77	31.28
<b>Limited Review:</b>														
24020 MSA Warren	107	11.09	0.00	0.00	1.69	1.87	84.43	78.50	13.88	19.63	0.00	3.61	80.13	16.26
28740 MSA Ulster	9	0.93	0.00	0.00	10.41	0.00	74.43	88.89	15.16	11.11	0.00	9.94	74.31	15.75
39100 MSA Orange	58	6.01	2.52	29.31	11.55	6.90	57.46	43.10	28.47	20.69	5.75	9.30	53.17	31.78
NonMSA NY Columbia Greene	45	4.66	0.00	0.00	7.00	4.44	44.87	40.00	48.12	55.56	0.00	8.23	46.18	45.60

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	34	85.00	4.37	0.00	11.32	14.71	56.55	44.12	27.76	41.18	2.25	11.47	59.68	26.59
<b>Limited Review:</b>														
24020 MSA Warren	5	12.50	0.00	0.00	1.69	0.00	84.43	80.00	13.88	20.00	0.00	1.68	81.51	16.81
28740 MSA Ulster	0	0.00	0.00	0.00	10.41	0.00	74.43	0.00	15.16	0.00	0.00	10.49	76.40	13.11
39100 MSA Orange	1	2.50	2.52	0.00	11.55	0.00	57.46	100.00	28.47	0.00	0.75	9.70	55.97	33.58
NonMSA NY Columbia Greene	0	0.00	0.00	0.00	7.00	0.00	44.87	0.00	48.12	0.00	0.00	10.82	40.72	48.45

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\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013					
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	3,110	84.74	4.37	2.22	11.32	6.95	56.55	52.51	27.76	38.33	1.77	6.92	56.14	35.17
<b>Limited Review:</b>														
24020 MSA Warren	285	7.77	0.00	0.00	1.69	0.70	84.43	81.75	13.88	17.54	0.00	1.21	80.03	18.75
28740 MSA Ulster	18	0.49	0.00	0.00	10.41	0.00	74.43	88.89	15.16	11.11	0.00	8.31	73.98	17.71
39100 MSA Orange	73	1.99	2.52	15.07	11.55	10.96	57.46	50.68	28.47	23.29	2.60	6.95	55.18	35.27
NonMSA NY Columbia Greene	184	5.01	0.00	0.00	7.00	9.24	44.87	45.11	48.12	45.65	0.00	6.51	40.12	53.37

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\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: 2012 NEW YORK STATE								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	8	88.89	13.50	12.50	22.87	25.00	40.10	62.50	23.53	0.00	16.43	20.00	42.14	21.43
<b>Limited Review:</b>														
24020 MSA Warren	1	11.11	0.00	0.00	11.90	0.00	73.10	100.00	15.00	0.00	0.00	27.27	54.55	18.18
28740 MSA Ulster	0	0.00	0.00	0.00	24.67	0.00	65.42	0.00	9.91	0.00	0.00	9.09	63.64	27.27
39100 MSA Orange	0	0.00	19.47	0.00	24.52	0.00	46.33	0.00	9.68	0.00	19.35	16.13	58.06	6.45
NonMSA NY Columbia Greene	0	0.00	0.00	0.00	8.74	0.00	71.23	0.00	20.03	0.00	0.00	0.00	90.00	10.00

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\* Based on

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	211	94.62	7.48	11.85	15.81	13.27	50.41	54.98	26.27	19.91	7.18	13.15	52.81	26.86
<b>Limited Review:</b>														
24020 MSA Warren	4	1.79	0.00	0.00	5.80	0.00	80.91	100.00	13.28	0.00	0.00	6.14	78.21	15.65
28740 MSA Ulster	0	0.00	0.00	0.00	13.08	0.00	70.39	0.00	16.53	0.00	0.00	11.02	70.20	18.78
39100 MSA Orange	0	0.00	7.66	0.00	14.46	0.00	53.71	0.00	24.17	0.00	12.84	10.79	48.73	27.64
NonMSA NY Columbia Greene	8	3.59	0.00	0.00	6.64	0.00	49.63	62.50	43.70	37.50	0.00	4.89	49.03	46.08

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	0	0.00	1.95	0.00	10.81	0.00	66.39	0.00	20.85	0.00	0.00	15.58	75.32	9.09
<b>Limited Review:</b>														
24020 MSA Warren	0	0.00	0.00	0.00	0.71	0.00	93.63	0.00	5.66	0.00	0.00	0.00	100.0	0.00
28740 MSA Ulster	0	0.00	0.00	0.00	7.92	0.00	70.44	0.00	21.65	0.00	0.00	0.00	47.83	52.17
39100 MSA Orange	0	0.00	1.04	0.00	7.74	0.00	62.16	0.00	29.06	0.00	8.16	2.04	40.82	48.98
NonMSA NY Columbia Greene	0	0.00	0.00	0.00	4.16	0.00	43.58	0.00	52.26	0.00	0.00	2.44	46.34	51.22

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>12</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	746	77.31	20.53	9.73	18.05	21.51	21.80	26.44	39.62	42.33	10.68	27.70	28.39	33.24
<b>Limited Review:</b>														
24020 MSA Warren	107	11.09	18.07	3.77	19.24	23.58	23.61	19.81	39.09	52.83	8.14	24.43	28.18	39.25
28740 MSA Ulster	9	0.93	19.57	0.00	17.81	11.11	23.03	22.22	39.59	66.67	5.59	21.92	28.75	43.74
39100 MSA Orange	58	6.01	20.50	3.57	17.80	32.14	22.49	26.79	39.21	37.50	6.91	25.24	34.45	33.40
NonMSA NY Columbia Greene	45	4.66	16.00	6.98	16.48	6.98	19.40	20.93	48.12	65.12	3.72	15.10	25.60	55.58

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\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by BANK.

12 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>13</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	34	85.00	20.53	17.65	18.05	14.71	21.80	41.18	39.62	26.47	11.57	22.31	27.93	38.18
<b>Limited Review:</b>														
24020 MSA Warren	5	12.50	18.07	20.00	19.24	0.00	23.61	40.00	39.09	40.00	11.63	19.48	30.81	38.08
28740 MSA Ulster	0	0.00	19.57	0.00	17.81	0.00	23.03	0.00	39.59	0.00	14.57	27.95	20.08	37.40
39100 MSA Orange	1	2.50	20.50	0.00	17.80	0.00	22.49	100.00	39.21	0.00	10.63	22.05	29.13	38.19
NonMSA NY Columbia Greene	0	0.00	16.00	0.00	16.48	0.00	19.40	0.00	48.12	0.00	3.28	15.85	22.95	57.92

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\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

13 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: 2012 NEW YORK STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>14</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
10580 MSA Albany Full	3,110	84.74	20.53	6.26	18.05	19.23	21.80	28.19	39.62	46.32	6.20	19.06	28.57	46.16
<b>Limited Review:</b>														
24020 MSA Warren	285	7.77	18.07	3.55	19.24	12.77	23.61	34.04	39.09	49.65	6.59	16.30	25.94	51.17
28740 MSA Ulster	18	0.49	19.57	0.00	17.81	11.11	23.03	22.22	39.59	66.67	6.55	16.96	27.02	49.47
39100 MSA Orange	73	1.99	20.50	6.85	17.80	19.18	22.49	27.40	39.21	46.58	5.68	16.22	32.05	46.05
NonMSA NY Columbia Greene	184	5.01	16.00	2.21	16.48	13.81	19.40	22.10	48.12	61.88	1.78	10.93	21.65	65.64

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\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

14 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012 NEW YORK STATE			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
10580 MSA Albany Full	211	94.62	70.39	49.29	39.34	23.70	36.97	15,410	4,285
<b>Limited Review:</b>									
24020 MSA Warren	4	1.79	73.96	75.00	50.00	25.00	25.00	2,208	694
28740 MSA Ulster	0	0.00	73.71	0.00	0.00	0.00	0.00	3,590	1,131
39100 MSA Orange	0	0.00	72.65	0.00	0.00	0.00	0.00	7,155	2,479
NonMSA NY Columbia Greene	8	3.59	72.71	62.50	50.00	37.50	12.50	2,261	639

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\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: 2012 NEW YORK STATE			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
10580 MSA Albany Full	0	0.00	97.85	0.00	0.00	0.00	0.00	77	39
<b>Limited Review:</b>									
24020 MSA Warren	0	0.00	97.88	0.00	0.00	0.00	0.00	53	19
28740 MSA Ulster	0	0.00	97.42	0.00	0.00	0.00	0.00	23	5
39100 MSA Orange	0	0.00	97.11	0.00	0.00	0.00	0.00	50	14
NonMSA NY Columbia Greene	0	0.00	98.37	0.00	0.00	0.00	0.00	44	16

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\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2012).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: 2012 NEW YORK STATE				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013			
AA:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
10580 MSA Albany Full	31	449	47	915	78	1,364	0.00	0	0
<b>Limited Review:</b>									
24020 MSA Warren	2	13	5	61	7	74	0.00	0	0
28740 MSA Ulster	0	0	0	0	0	0	0.00	0	0
39100 MSA Orange	0	0	0	0	0	0	0.00	0	0
NonMSA NY Columbia Greene	2	3	3	11	5	14	0.00	0	0

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\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2013 TO JUNE 30, 2013								Geography: 2012 NEW YORK STATE				Evaluation Period:					
AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
10580 MSA Albany Full	87.78%	55	76.4%	9.1%	9.1%	52.7%	29.1%	2	0	0	0	1	1	9.63	14.16	50.96	24.89
<b>Limited Review:</b>																	
24020 MSA Warren	4.53%	5	6.9%	0.00	0.00	100%	0.00	0	0	0	0	0	0	0.00	3.47	83.45	13.08
28740 MSA Ulster	.35%	2	1.46%	0.00	50%	50%	0.00	1	0	0	1	0	0	0.00	12.30	72.27	15.43
39100 MSA Orange	3.11%	5	6.9%	0.00	20%	60%	20%	0	0	0	0	0	0	8.13	14.68	52.78	24.11
NonMSA NY Columbia Greene	4.23%	5	6.9%	0.00	0.00	60%	40%	0	0	0	0	0	0	0.00	7.30	46.71	43.52

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM																	
Geography: 2012 NEW YORK STATE																	
Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013																	
AA:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
10580 MSA Albany Full	87.78%	55	76.4%	9.1%	9.1%	52.7%	29.1%	0	146	5	5	31	21	9.63	14.16	50.96	24.89
<b>Limited Review:</b>																	
24020 MSA Warren	4.53%	5	6.9%	0.00	0.00	100%	0.00	0	146	0	0	5	0	0.00	3.47	83.45	13.08
28740 MSA Ulster	.35%	2	1.46%	0.00	50%	50%	0.00	0	146	0	1	1	0	0.00	12.30	72.27	15.43
39100 MSA Orange	3.11%	5	6.9%	0.00	20%	60%	20%	0	146	0	1	3	1	8.13	14.68	52.78	24.11
NonMSA NY Columbia Greene	4.23%	5	6.9%	0.00	0.00	60%	40%	0	146	0	0	3	2	0.00	7.30	46.71	43.52

Institution ID: TRUSTCO BK (10000707635)

**10580 MSA Albany Full**

Demographic Information for Full Scope Area: 10580 MSA Albany Full						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	218	11.01	16.51	50.00	21.56	0.92
Population by Geography	870,716	9.63	14.16	50.96	24.89	0.37
Owner-Occupied Housing by Geography	229,151	4.37	11.32	56.55	27.76	0.00
Business by Geography	72,006	7.48	15.81	50.41	26.27	0.03
Farms by Geography	1,952	1.95	10.81	66.39	20.85	0.00
Family Distribution by Income Level	213,800	20.53	18.05	21.80	39.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	82,480	15.02	20.96	49.39	14.64	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		74,739 78,100 10%	Median Housing Value Unemployment Rate (2010 US Census)		186,839 3.26%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BK (10000707635)

**NonMSA NY Columbia Greene**

Demographic Information for Limited Scope Area: NonMSA NY Columbia Greene						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	0.00	5.56	50.00	41.67	2.78
Population by Geography	112,317	0.00	7.30	46.71	43.52	2.47
Owner-Occupied Housing by Geography	32,424	0.00	7.00	44.87	48.12	0.00
Business by Geography	9,953	0.00	6.64	49.63	43.70	0.03
Farms by Geography	553	0.00	4.16	43.58	52.26	0.00
Family Distribution by Income Level	28,356	16.00	16.48	19.40	48.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	9,209	0.00	11.05	54.04	34.90	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		54,294 56,900 10%	Median Housing Value Unemployment Rate (2010 US Census)		207,005 3.33%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BK (10000707635)

**39100 MSA Orange**

Demographic Information for Limited Scope Area: 39100 MSA Orange						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	158	7.59	15.19	55.06	20.89	1.27
Population by Geography	670,301	8.13	14.68	52.78	24.11	0.31
Owner-Occupied Housing by Geography	164,111	2.52	11.55	57.46	28.47	0.00
Business by Geography	56,305	7.66	14.46	53.71	24.17	0.00
Farms by Geography	1,834	1.04	7.74	62.16	29.06	0.00
Family Distribution by Income Level	164,000	20.50	17.80	22.49	39.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	62,811	13.30	21.62	50.22	14.86	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		82,963 87,200 8%	Median Housing Value Unemployment Rate (2010 US Census)		308,113 3.29%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BK (10000707635)

**28740 MSA Ulster**

Demographic Information for Limited Scope Area: 28740 MSA Ulster						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	47	0.00	14.89	70.21	14.89	0.00
Population by Geography	182,493	0.00	12.30	72.27	15.43	0.00
Owner-Occupied Housing by Geography	49,203	0.00	10.41	74.43	15.16	0.00
Business by Geography	16,955	0.00	13.08	70.39	16.53	0.00
Farms by Geography	619	0.00	7.92	70.44	21.65	0.00
Family Distribution by Income Level	45,201	19.57	17.81	23.03	39.59	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,897	0.00	18.57	71.54	9.89	0.00
Median Family Income		70,513	Median Housing Value		247,069	
HUD Adjusted Median Family Income for 2012		73,900	Unemployment Rate (2010 US Census)		3.40%	
Households Below Poverty Level		10%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BK (10000707635)

**24020 MSA Warren**

Demographic Information for Limited Scope Area: 24020 MSA Warren						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	0.00	5.56	83.33	11.11	0.00
Population by Geography	128,923	0.00	3.47	83.45	13.08	0.00
Owner-Occupied Housing by Geography	37,761	0.00	1.69	84.43	13.88	0.00
Business by Geography	11,218	0.00	5.80	80.91	13.28	0.00
Farms by Geography	565	0.00	0.71	93.63	5.66	0.00
Family Distribution by Income Level	35,107	18.07	19.24	23.61	39.09	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	13,097	0.00	4.48	87.08	8.44	0.00
Median Family Income		60,649	Median Housing Value		171,097	
HUD Adjusted Median Family Income for 2012		62,600	Unemployment Rate (2010 US Census)		3.46%	
Households Below Poverty Level		11%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

## State of Florida

Institution ID: TRUSTCO BANK (1000707635) (Included)

Table 1. Lending Volume

LENDING VOLUME		Geography: REVISED 2011 FL STATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA (2011):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
2011 36740 Lake Orange	60.71	238	33,998	3	1,298	0	0	0	0	241	35,296	56.79%
<b>Limited Review:</b>												
2011 19660 Volusia	10.83	42	5,967	1	100	0	0	0	0	43	6,067	7.19%
2011 29460 Polk	3.78	15	1,455	0	0	0	0	0	0	15	1,455	1.95%
2011 35840 Manatee Sarasota	12.34	49	7,852	0	0	0	0	0	0	49	7,852	24.96%
2011 37340 Brevard	2.02	8	1,547	0	0	0	0	0	0	8	1,547	0.00
2011 39460 Charlotte	1.76	7	667	0	0	0	0	0	0	7	667	2.99%
2011 45300 Hillsborough	8.56	34	3,416	0	0	0	0	0	0	34	3,416	5.59%
2011 48424 Palm Beach	0.00	0	0	0	0	0	0	0	0	0	0	.54%

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 1. Other Products**

LENDING VOLUME		Geography: REVISED 2011 FL STATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA (2011):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2011 36740 Lake Orange	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
<b>Limited Review:</b>														
2011 19660 Volusia	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
2011 29460 Polk	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
2011 35840 Manatee Sarasota	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
2011 37340 Brevard	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
2011 39460 Charlotte	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
2011 45300 Hillsborough	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
2011 48424 Palm Beach	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 1. Other Products**

LENDING VOLUME		Geography: REVISED 2011 FL STATE		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
AA (2011):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2011 36740 Lake Orange	0	0	0	0	0
<b>Limited Review:</b>					
2011 19660 Volusia	0	0	0	0	0
2011 29460 Polk	0	0	0	0	0
2011 35840 Manatee Sarasota	0	0	0	0	0
2011 37340 Brevard	0	0	0	0	0
2011 39460 Charlotte	0	0	0	0	0
2011 45300 Hillsborough	0	0	0	0	0
2011 48424 Palm Beach	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

Institution ID: TRUSTCO BANK (10000707635) (Included)

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: REVISED 2011 FL STATE					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	162	56.84	0.62	0.00	17.95	11.73	49.89	51.85	31.54	36.42	0.12	11.83	51.44	36.61
<b>Limited Review:</b>														
2011 19660 Volusia	27	9.47	0.47	0.00	9.62	0.00	74.00	66.67	15.91	33.33	0.02	4.67	71.71	23.61
2011 29460 Polk	13	4.56	0.14	0.00	15.41	15.38	60.75	69.23	23.70	15.38	0.04	7.27	62.55	30.13
2011 35840 Manatee Sarasota	36	12.63	0.30	0.00	20.46	11.11	54.68	63.89	24.56	25.00	0.06	9.49	56.53	33.92
2011 37340 Brevard	8	2.81	0.62	0.00	17.75	12.50	49.76	50.00	31.87	37.50	0.11	9.28	57.58	33.03
2011 39460 Charlotte	5	1.75	0.00	0.00	5.11	0.00	82.99	100.00	11.90	0.00	0.00	1.52	86.10	12.38
2011 45300 Hillsborough	34	11.93	1.57	0.00	17.09	2.94	38.00	73.53	43.35	23.53	0.43	13.77	30.64	55.16
2011 48424 Palm Beach	0	0.00	1.53	0.00	24.63	0.00	36.35	0.00	37.50	0.00	1.08	14.54	36.57	47.81

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 FL STATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	5	83.33	0.62	0.00	17.95	0.00	49.89	80.00	31.54	20.00	0.22	23.68	45.50	30.59
<b>Limited Review:</b>														
2011 19660 Volusia	1	16.67	0.47	0.00	9.62	0.00	74.00	100.00	15.91	0.00	0.35	9.93	65.60	24.11
2011 29460 Polk	0	0.00	0.14	0.00	15.41	0.00	60.75	0.00	23.70	0.00	0.27	13.33	61.07	25.33
2011 35840 Manatee Sarasota	0	0.00	0.30	0.00	20.46	0.00	54.68	0.00	24.56	0.00	0.00	17.48	55.34	27.18
2011 37340 Brevard	0	0.00	0.62	0.00	17.75	0.00	49.76	0.00	31.87	0.00	0.77	14.29	50.58	34.36
2011 39460 Charlotte	0	0.00	0.00	0.00	5.11	0.00	82.99	0.00	11.90	0.00	0.00	2.90	91.30	5.80
2011 45300 Hillsborough	0	0.00	1.57	0.00	17.09	0.00	38.00	0.00	43.35	0.00	0.81	13.18	30.63	55.38
2011 48424 Palm Beach	0	0.00	1.53	0.00	24.63	0.00	36.35	0.00	37.50	0.00	3.07	14.89	28.37	53.66

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE TO DECEMBER 31, 2011			Geography: REVISED 2011 FL STATE								Evaluation Period: JANUARY 1, 2011			
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	71	69.61	0.62	0.00	17.95	1.41	49.89	47.89	31.54	50.70	0.12	7.75	41.95	50.17
<b>Limited Review:</b>														
2011 19660 Volusia	14	13.73	0.47	0.00	9.62	0.00	74.00	57.14	15.91	42.86	0.05	4.37	65.64	29.94
2011 29460 Polk	2	1.96	0.14	0.00	15.41	0.00	60.75	100.00	23.70	0.00	0.06	6.34	55.71	37.89
2011 35840 Manatee Sarasota	13	12.75	0.30	0.00	20.46	23.08	54.68	53.85	24.56	23.08	0.04	6.42	50.61	42.93
2011 37340 Brevard	0	0.00	0.62	0.00	17.75	0.00	49.76	0.00	31.87	0.00	0.05	7.02	46.05	46.88
2011 39460 Charlotte	2	1.96	0.00	0.00	5.11	0.00	82.99	100.00	11.90	0.00	0.00	0.94	78.66	20.40
2011 45300 Hillsborough	0	0.00	1.57	0.00	17.09	0.00	38.00	0.00	43.35	0.00	0.38	6.49	23.84	69.29
2011 48424 Palm Beach	0	0.00	1.53	0.00	24.63	0.00	36.35	0.00	37.50	0.00	0.56	7.54	29.91	61.99

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: REVISED 2011 FL STATE					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% of MF Units**	% BANK Loans***	% MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	0	0.00	2.41	0.00	30.42	0.00	49.93	0.00	17.23	0.00	0.00	46.67	31.11	22.22
<b>Limited Review:</b>														
2011 19660 Volusia	0	0.00	1.77	0.00	26.94	0.00	60.83	0.00	10.46	0.00	0.00	35.29	58.82	5.88
2011 29460 Polk	0	0.00	2.87	0.00	23.09	0.00	42.68	0.00	31.35	0.00	0.00	16.67	83.33	0.00
2011 35840 Manatee Sarasota	0	0.00	0.53	0.00	20.94	0.00	43.00	0.00	35.54	0.00	0.00	25.00	56.25	18.75
2011 37340 Brevard	0	0.00	2.10	0.00	26.13	0.00	53.00	0.00	18.77	0.00	0.00	100.00	0.00	0.00
2011 39460 Charlotte	0	0.00	0.00	0.00	15.97	0.00	66.08	0.00	17.95	0.00	0.00	50.00	0.00	50.00
2011 45300 Hillsborough	0	0.00	9.68	0.00	23.83	0.00	34.46	0.00	32.03	0.00	8.33	25.00	30.56	36.11
2011 48424 Palm Beach	0	0.00	3.13	0.00	32.78	0.00	31.51	0.00	32.58	0.00	10.00	30.00	23.33	36.67

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES TO DECEMBER 31, 2011			Geography: REVISED 2011 FL STATE								Evaluation Period: JANUARY 1, 2011			
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	3	75.00	1.07	0.00	18.40	33.33	46.78	33.33	33.75	33.33	1.33	16.34	44.13	38.20
<b>Limited Review:</b>														
2011 19660 Volusia	1	25.00	0.71	0.00	14.11	0.00	65.77	100.00	19.40	0.00	1.03	14.36	63.97	20.63
2011 29460 Polk	0	0.00	0.26	0.00	17.10	0.00	58.73	0.00	23.90	0.00	0.16	18.88	55.75	25.21
2011 35840 Manatee Sarasota	0	0.00	0.33	0.00	17.43	0.00	51.34	0.00	30.90	0.00	0.22	14.52	50.45	34.80
2011 37340 Brevard	0	0.00	0.82	0.00	19.86	0.00	46.97	0.00	32.35	0.00	1.09	20.91	42.48	35.52
2011 39460 Charlotte	0	0.00	0.00	0.00	3.93	0.00	85.99	0.00	10.08	0.00	0.00	4.52	85.45	10.03
2011 45300 Hillsborough	0	0.00	2.83	0.00	21.53	0.00	30.62	0.00	45.02	0.00	2.78	21.21	28.42	47.60
2011 48424 Palm Beach	0	0.00	2.78	0.00	19.29	0.00	34.19	0.00	43.62	0.00	2.74	16.78	32.99	47.49

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: REVISED 2011 FL STATE						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	0	0.00	0.85	0.00	17.54	0.00	55.52	0.00	26.08	0.00	0.00	8.96	65.67	25.37
<b>Limited Review:</b>														
2011 19660 Volusia	0	0.00	0.46	0.00	9.27	0.00	72.49	0.00	17.78	0.00	0.00	0.00	78.95	21.05
2011 29460 Polk	0	0.00	0.00	0.00	14.69	0.00	63.19	0.00	22.12	0.00	0.00	25.71	51.43	22.86
2011 35840 Manatee Sarasota	0	0.00	0.31	0.00	16.79	0.00	56.01	0.00	26.89	0.00	0.00	18.75	34.38	46.88
2011 37340 Brevard	0	0.00	1.07	0.00	17.84	0.00	53.53	0.00	27.56	0.00	0.00	8.33	25.00	66.67
2011 39460 Charlotte	0	0.00	0.00	0.00	3.26	0.00	91.91	0.00	4.83	0.00	0.00	0.00	100.0	0.00
2011 45300 Hillsborough	0	0.00	1.12	0.00	16.80	0.00	42.52	0.00	39.56	0.00	0.00	6.67	53.33	40.00
2011 48424 Palm Beach	0	0.00	2.82	0.00	23.02	0.00	34.77	0.00	39.38	0.00	4.62	4.62	35.38	55.38

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Institution ID: TRUSTCO BANK (10000707635) (Included)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: REVISED 2011 FL STATE					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>15</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	162	56.84	18.74	8.02	18.84	27.16	22.70	24.69	39.72	40.12	9.01	23.94	23.45	43.60
<b>Limited Review:</b>														
2011 19660 Volusia	27	9.47	17.44	0.00	19.60	18.52	23.44	14.81	39.51	66.67	12.70	24.15	23.12	40.03
2011 29460 Polk	13	4.56	18.23	0.00	19.44	15.38	22.60	23.08	39.73	61.54	9.94	29.74	24.91	35.41
2011 35840 Manatee Sarasota	36	12.63	17.71	2.86	19.64	5.71	23.60	17.14	39.06	74.29	7.56	18.20	20.73	53.51
2011 37340 Brevard	8	2.81	18.27	0.00	19.30	12.50	22.67	12.50	39.76	75.00	9.68	22.73	22.35	45.24
2011 39460 Charlotte	5	1.75	15.59	0.00	20.59	0.00	25.42	80.00	38.40	20.00	7.53	18.30	21.87	52.31
2011 45300 Hillsborough	34	11.93	18.55	2.94	17.07	11.76	20.67	29.41	43.71	55.88	6.09	20.03	23.39	50.49
2011 48424 Palm Beach	0	0.00	19.86	0.00	18.56	0.00	20.60	0.00	40.98	0.00	7.52	19.68	21.27	51.53

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by BANK.

15 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 FL STATE					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>16</sub>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 36740 Lake Orange	5	83.33	18.74	20.00	18.84	60.00	22.70	0.00	39.72	20.00	15.08	21.11	23.78	40.02
<b>Limited Review:</b>														
2011 19660 Volusia	1	16.67	17.44	0.00	19.60	0.00	23.44	0.00	39.51	100.00	19.27	31.64	21.09	28.00
2011 29460 Polk	0	0.00	18.23	0.00	19.44	0.00	22.60	0.00	39.73	0.00	14.76	32.87	20.33	32.03
2011 35840 Manatee Sarasota	0	0.00	17.71	0.00	19.64	0.00	23.60	0.00	39.06	0.00	15.49	28.62	18.18	37.71
2011 37340 Brevard	0	0.00	18.27	0.00	19.30	0.00	22.67	0.00	39.76	0.00	19.12	23.11	17.13	40.64
2011 39460 Charlotte	0	0.00	15.59	0.00	20.59	0.00	25.42	0.00	38.40	0.00	19.12	16.18	33.82	30.88
2011 45300 Hillsborough	0	0.00	18.55	0.00	17.07	0.00	20.67	0.00	43.71	0.00	10.24	18.08	22.88	48.80
2011 48424 Palm Beach	0	0.00	19.86	0.00	18.56	0.00	20.60	0.00	40.98	0.00	9.18	19.60	22.83	48.39

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

16 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: REVISED 2011 FL STATE				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data										
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>17</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp							
<b>Full Review:</b>																					
2011 36740 Lake Orange	71	69.61	18.74	4.29	18.84	14.29	22.70	20.00	39.72	61.43	5.86	12.90	19.82	61.41							
<b>Limited Review:</b>																					
2011 19660 Volusia	14	13.73	17.44	0.00	19.60	21.43	23.44	14.29	39.51	64.29	8.87	18.47	22.89	49.78							
2011 29460 Polk	2	1.96	18.23	0.00	19.44	0.00	22.60	50.00	39.73	50.00	5.13	17.03	22.83	55.01							
2011 35840 Manatee Sarasota	13	12.75	17.71	0.00	19.64	15.38	23.60	30.77	39.06	53.85	4.82	13.53	20.01	61.64							
2011 37340 Brevard	0	0.00	18.27	0.00	19.30	0.00	22.67	0.00	39.76	0.00	7.23	15.42	21.07	56.28							
2011 39460 Charlotte	2	1.96	15.59	0.00	20.59	0.00	25.42	0.00	38.40	100.00	7.12	17.46	23.66	51.76							
2011 45300 Hillsborough	0	0.00	18.55	0.00	17.07	0.00	20.67	0.00	43.71	0.00	3.64	9.86	16.97	69.53							
2011 48424 Palm Beach	0	0.00	19.86	0.00	18.56	0.00	20.60	0.00	40.98	0.00	5.32	11.82	18.05	64.81							

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by BANK.

17 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: REVISED 2011 FL STATE			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 36740 Lake Orange	3	75.00	70.85	100.00	33.33	0.00	66.67	34,520	14,328
<b>Limited Review:</b>									
2011 19660 Volusia	1	25.00	71.11	100.00	100.00	0.00	0.00	6,865	3,265
2011 29460 Polk	0	0.00	72.96	0.00	0.00	0.00	0.00	5,938	2,384
2011 35840 Manatee Sarasota	0	0.00	72.14	0.00	0.00	0.00	0.00	12,695	5,585
2011 37340 Brevard	0	0.00	64.34	0.00	0.00	0.00	0.00	8,162	3,410
2011 39460 Charlotte	0	0.00	73.05	0.00	0.00	0.00	0.00	2,578	1,087
2011 45300 Hillsborough	0	0.00	69.36	0.00	0.00	0.00	0.00	19,553	8,143
2011 48424 Palm Beach	0	0.00	70.34	0.00	0.00	0.00	0.00	33,058	14,096

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: REVISED 2011 FL STATE			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 36740 Lake Orange	0	0.00	96.74	0.00	0.00	0.00	0.00	70	40
<b>Limited Review:</b>									
2011 19660 Volusia	0	0.00	98.44	0.00	0.00	0.00	0.00	19	12
2011 29460 Polk	0	0.00	96.37	0.00	0.00	0.00	0.00	37	23
2011 35840 Manatee Sarasota	0	0.00	96.57	0.00	0.00	0.00	0.00	34	14
2011 37340 Brevard	0	0.00	98.14	0.00	0.00	0.00	0.00	13	8
2011 39460 Charlotte	0	0.00	98.31	0.00	0.00	0.00	0.00	5	4
2011 45300 Hillsborough	0	0.00	96.09	0.00	0.00	0.00	0.00	60	27
2011 48424 Palm Beach	0	0.00	96.20	0.00	0.00	0.00	0.00	66	46

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\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: REVISED 2011 FL STATE				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2011 36740 Lake Orange	0	0	5	24	5	24	0.00	0	0
<b>Limited Review:</b>									
2011 19660 Volusia	0	0	0	0	0	0	0.00	0	0
2011 29460 Polk	0	0	0	0	0	0	0.00	0	0
2011 35840 Manatee Sarasota	0	0	0	0	1	3.5	0.00	0	0
2011 37340 Brevard	0	0	0	0	0	0	0.00	0	0
2011 39460 Charlotte	0	0	0	0	0	0	0.00	0	0
2011 45300 Hillsborough	0	0	0	0	0	0	0.00	0	0
2011 48424 Palm Beach	0	0	0	0	0	0	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2011 TO DECEMBER 31, 2011								Geography: REVISED 2011 FL STATE				Evaluation Period:					
AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2011 36740 Lake Orange	56.79%	32	72.7%	0.00	15.6%	40.6%	43.8%	1	0	0	0	+1	0	1.63	22.82	48.22	27.33
<b>Limited Review:</b>																	
2011 19660 Volusia	7.19%	2	4.55%	0.00	50%	0.00	50%	0	0	0	0	0	0	0.99	15.06	69.38	14.57
2011 29460 Polk	1.95%	2	4.55%	0.00	0.00	50%	50%	0	0	0	0	0	0	0.51	19.53	58.13	21.83
2011 35840 Manatee Sarasota	24.96%	4	9.09%	0.00	50%	25%	25%	0	0	0	0	0	0	0.67	25.18	52.01	22.14
2011 37340 Brevard*	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	1.34	19.21	51.27	28.17
2011 39460 Charlotte	2.99%	1	2.27%	0.00	0.00	100%	0.00	0	0	0	0	0	0	0.00	6.13	84.24	9.63
2011 45300 Hillsborough	5.59%	2	4.55%	0.00	0.00	100%	0.00	1	0	0	0	+1	0	4.58	21.52	36.64	37.26
2011 48424 Palm Beach	.54%	1	2.27%	0.00	100%	0.00	0.00	1	0	0	+1	0	0	4.21	29.32	33.88	32.37

\*The data is of 6/30/2012. A Branch was added in Brevard County on August 13, 2012.

## Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM																	
Geography: REVISED 2011 FL STATE																	
Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011																	
AA:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2011 36740 Lake Orange	56.79%	32	72.7%	0.00	15.6%	40.6%	43.8%	32	146	0	5	13	14	1.63	22.82	48.22	27.33
<b>Limited Review:</b>																	
2011 19660 Volusia	7.19%	2	4.55%	0.00	50%	0.00	50%	2	146	0	0	0	0	0.99	15.06	69.38	14.57
2011 29460 Polk	1.95%	2	4.55%	0.00	0.00	50%	50%	2	146	0	0	1	1	0.51	19.53	58.13	21.83
2011 35840 Manatee Sarasota	24.96%	4	9.09%	0.00	50%	25%	25%	4	146	0	2	1	1	0.67	25.18	52.01	22.14
2011 37340 Brevard	0.00	0	0.00	0.00	0.00	0.00	0.00	0	146	0	0	0	0	1.34	19.21	51.27	28.17
2011 39460 Charlotte	2.99%	1	2.27%	0.00	0.00	100%	0.00	1	146	0	0	1	0	0.00	6.13	84.24	9.63
2011 45300 Hillsborough	5.59%	2	4.55%	0.00	0.00	100%	0.00	2	146	0	0	2	0	4.58	21.52	36.64	37.26
2011 48424 Palm Beach	.54%	1	2.27%	0.00	100%	0.00	0.00	1	146	0	1	0	0	4.21	29.32	33.88	32.37

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 19660 Volusia**

Demographic Information for Limited Scope Area: 2011 19660 Volusia						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	78	2.56	19.23	66.67	11.54	0.00
Population by Geography	443,343	0.99	15.06	69.38	14.57	0.00
Owner-Occupied Housing by Geography	139,037	0.47	9.62	74.00	15.91	0.00
Business by Geography	72,885	0.71	14.11	65.77	19.40	0.00
Farms by Geography	2,374	0.46	9.27	72.49	17.78	0.00
Family Distribution by Income Level	120,720	17.44	19.60	23.44	39.51	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	44,725	1.48	19.03	69.89	9.60	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		41,785 57,100 11%	Median Housing Value Unemployment Rate (2000 US Census)		85,193 2.85%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 48424 Palm Beach**

Demographic Information for Limited Scope Area: 2011 48424 Palm Beach						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	265	5.66	26.42	33.58	33.58	0.75
Population by Geography	1,131,184	4.21	29.32	33.88	32.37	0.21
Owner-Occupied Housing by Geography	354,024	1.53	24.63	36.35	37.50	0.00
Business by Geography	257,029	2.78	19.29	34.19	43.62	0.12
Farms by Geography	4,792	2.82	23.02	34.77	39.38	0.02
Family Distribution by Income Level	306,002	19.86	18.56	20.60	40.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	117,575	7.08	40.85	33.45	18.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		53,777 63,300 9%	Median Housing Value Unemployment Rate (2000 US Census)		131,523 2.24%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 45300 Hillsborough**

Demographic Information for Limited Scope Area: 2011 45300 Hillsborough						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	249	4.82	23.29	36.95	34.94	0.00
Population by Geography	998,948	4.58	21.52	36.64	37.26	0.00
Owner-Occupied Housing by Geography	251,023	1.57	17.09	38.00	43.35	0.00
Business by Geography	176,673	2.83	21.53	30.62	45.02	0.00
Farms by Geography	3,577	1.12	16.80	42.52	39.56	0.00
Family Distribution by Income Level	256,882	18.55	17.07	20.67	43.71	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	91,507	7.92	31.33	40.22	20.53	0.00
Median Family Income		45,339	Median Housing Value		100,069	
HUD Adjusted Median Family Income for 2011		55,700	Unemployment Rate (2000 US Census)		2.86%	
Households Below Poverty Level		11%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635) (Included)

2011 39460 Charlotte

Demographic Information for Limited Scope Area: 2011 39460 Charlotte						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	23	0.00	8.70	82.61	8.70	0.00
Population by Geography	141,627	0.00	6.13	84.24	9.63	0.00
Owner-Occupied Housing by Geography	53,444	0.00	5.11	82.99	11.90	0.00
Business by Geography	24,979	0.00	3.93	85.99	10.08	0.00
Farms by Geography	828	0.00	3.26	91.91	4.83	0.00
Family Distribution by Income Level	44,205	15.59	20.59	25.42	38.40	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,993	0.00	7.63	85.27	7.10	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		42,546 55,100 8%	Median Housing Value Unemployment Rate (2000 US Census)		94,729 1.29%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 37340 Brevard**

Demographic Information for Limited Scope Area: 2011 37340 Brevard						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	92	2.17	20.65	47.83	29.35	0.00
Population by Geography	476,230	1.34	19.21	51.27	28.17	0.00
Owner-Occupied Housing by Geography	147,878	0.62	17.75	49.76	31.87	0.00
Business by Geography	84,890	0.82	19.86	46.97	32.35	0.00
Farms by Geography	2,253	1.07	17.84	53.53	27.56	0.00
Family Distribution by Income Level	133,389	18.27	19.30	22.67	39.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	50,110	2.35	27.20	53.10	17.35	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		47,642 57,800 9%	Median Housing Value Unemployment Rate (2000 US Census)		93,117 2.25%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

## Institution ID: TRUSTCO BANK (10000707635) (Included)

## 2011 36740 Lake Orange

Demographic Information for Full Scope Area: 2011 36740 Lake Orange						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	328	2.44	23.17	46.04	28.35	0.00
Population by Geography	1,644,561	1.63	22.82	48.22	27.33	0.00
Owner-Occupied Housing by Geography	414,548	0.62	17.95	49.89	31.54	0.00
Business by Geography	340,598	1.07	18.40	46.78	33.75	0.00
Farms by Geography	7,752	0.85	17.54	55.52	26.08	0.00
Family Distribution by Income Level	428,378	18.74	18.84	22.70	39.72	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	160,974	2.80	32.81	50.01	14.38	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		47,851 57,400 10%	Median Housing Value Unemployment Rate (2000 US Census)		105,369 2.34%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 35840 Manatee Sarasota**

Demographic Information for Limited Scope Area: 2011 35840 Manatee Sarasota						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	143	0.70	21.68	53.85	23.78	0.00
Population by Geography	589,959	0.67	25.18	52.01	22.14	0.00
Owner-Occupied Housing by Geography	201,474	0.30	20.46	54.68	24.56	0.00
Business by Geography	116,693	0.33	17.43	51.34	30.90	0.00
Farms by Geography	2,919	0.31	16.79	56.01	26.89	0.00
Family Distribution by Income Level	169,248	17.71	19.64	23.60	39.06	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	63,209	0.98	35.28	50.96	12.78	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		48,550 59,100 8%	Median Housing Value Unemployment Rate (2000 US Census)		126,784 1.58%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 29460 Polk**

Demographic Information for Limited Scope Area: 2011 29460 Polk						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	110	0.91	25.45	57.27	16.36	0.00
Population by Geography	483,924	0.51	19.53	58.13	21.83	0.00
Owner-Occupied Housing by Geography	137,373	0.14	15.41	60.75	23.70	0.00
Business by Geography	63,056	0.26	17.10	58.73	23.90	0.00
Farms by Geography	2,369	0.00	14.69	63.19	22.12	0.00
Family Distribution by Income Level	132,948	18.23	19.44	22.60	39.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	50,085	0.65	27.19	60.27	11.89	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		41,491 53,800 12%	Median Housing Value Unemployment Rate (2000 US Census)		69,369 2.59%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

## State of Florida

Institution ID: TRUSTCO BANK (10000707635)

Table 1. Lending Volume

LENDING VOLUME		Geography: 2012 FLORIDA STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
36740 MSA Lake Orange	57.45	698	112,562	0	0	0	0	2	307	700	112,869	56.79%
<b>Limited Review:</b>												
19660 MSA Volusia	9.47	115	14,382	0	0	0	0	0	0	115	14,382	7.19%
29460 MSA Polk	3.62	44	4,908	0	0	0	0	0	0	44	4,908	1.95%
35840 MSA Manatee Sarasota	12.18	148	23,942	0	0	0	0	0	0	148	23,942	24.96%
37340 MSA Brevard	2.39	29	4,048	0	0	0	0	0	0	29	4,048	0.00
39460 MSA Charlotte	2.39	29	3,558	0	0	0	0	0	0	29	3,558	2.99%
45300 MSA Hillsborough	9.05	110	11,020	0	0	0	0	0	0	110	11,020	5.59%
48424 MSA Palm Beach	3.46	42	9,629	0	0	0	0	0	0	42	9,629	.54%

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to June 30, 2012.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 FLORIDA STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA (2012):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
36740 MSA Lake Orange	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
<b>Limited Review:</b>														
19660 MSA Volusia	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
29460 MSA Polk	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
35840 MSA Manatee Sarasota	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
37340 MSA Brevard	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
39460 MSA Charlotte	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
45300 MSA Hillsborough	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
48424 MSA Palm Beach	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 FLORIDA STATE		Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013	
AA (2012):	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
36740 MSA Lake Orange	0	0	0	0	0
<b>Limited Review:</b>					
19660 MSA Volusia	0	0	0	0	0
29460 MSA Polk	0	0	0	0	0
35840 MSA Manatee Sarasota	0	0	0	0	0
37340 MSA Brevard	0	0	0	0	0
39460 MSA Charlotte	0	0	0	0	0
45300 MSA Hillsborough	0	0	0	0	0
48424 MSA Palm Beach	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: 2012 FLORIDA STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	340	50.60	0.48	0.59	20.03	18.82	43.78	40.59	35.71	40.00	0.20	14.48	41.46	43.86
<b>Limited Review:</b>														
19660 MSA Volusia	56	8.33	1.29	1.79	15.68	1.79	54.75	44.64	28.28	51.79	0.19	11.02	53.36	35.42
29460 MSA Polk	30	4.46	1.27	0.00	19.20	26.67	54.65	60.00	24.88	13.33	0.26	13.15	52.26	34.33
35840 MSA Manatee Sarasota	91	13.54	1.26	1.10	20.07	4.40	48.99	61.54	29.68	32.97	0.23	10.59	49.03	40.14
37340 MSA Brevard	13	1.93	1.18	0.00	18.83	38.46	46.92	30.77	33.06	30.77	0.31	13.46	48.07	38.16
39460 MSA Charlotte	22	3.27	0.00	0.00	6.26	0.00	76.48	95.45	17.26	4.55	0.00	3.86	75.98	20.16
45300 MSA Hillsborough	101	15.03	3.23	0.99	18.89	33.66	36.80	59.41	41.09	5.94	1.07	11.88	32.79	54.26
48424 MSA Palm Beach	19	2.83	2.96	0.00	22.08	0.00	36.12	47.37	38.83	52.63	0.97	13.47	36.38	49.18

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: 2012 FLORIDA STATE								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	12	92.31	0.48	0.00	20.03	8.33	43.78	50.00	35.71	41.67	0.39	19.16	43.31	37.14
<b>Limited Review:</b>														
19660 MSA Volusia	0	0.00	1.29	0.00	15.68	0.00	54.75	0.00	28.28	0.00	2.92	20.45	52.92	23.70
29460 MSA Polk	1	7.69	1.27	0.00	19.20	0.00	54.65	100.00	24.88	0.00	0.92	19.54	47.82	31.72
35840 MSA Manatee Sarasota	0	0.00	1.26	0.00	20.07	0.00	48.99	0.00	29.68	0.00	1.51	19.44	49.03	30.02
37340 MSA Brevard	0	0.00	1.18	0.00	18.83	0.00	46.92	0.00	33.06	0.00	0.87	17.44	45.35	36.34
39460 MSA Charlotte	0	0.00	0.00	0.00	6.26	0.00	76.48	0.00	17.26	0.00	0.00	5.04	77.31	17.65
45300 MSA Hillsborough	0	0.00	3.23	0.00	18.89	0.00	36.80	0.00	41.09	0.00	1.93	15.08	32.35	50.64
48424 MSA Palm Beach	0	0.00	2.96	0.00	22.08	0.00	36.12	0.00	38.83	0.00	2.36	16.54	31.81	49.29

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: 2012 FLORIDA STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013					
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	346	65.28	0.48	0.87	20.03	9.83	43.78	35.26	35.71	54.05	0.18	12.49	39.92	47.41
<b>Limited Review:</b>														
19660 MSA Volusia	59	11.13	1.29	0.00	15.68	10.17	54.75	62.71	28.28	27.12	0.53	11.42	51.61	36.44
29460 MSA Polk	13	2.45	1.27	0.00	19.20	7.69	54.65	61.54	24.88	30.77	0.36	10.44	52.09	37.11
35840 MSA Manatee Sarasota	57	10.75	1.26	0.00	20.07	3.51	48.99	59.65	29.68	36.84	0.26	9.81	49.22	40.71
37340 MSA Brevard	16	3.02	1.18	0.00	18.83	12.50	46.92	56.25	33.06	31.25	0.39	11.66	46.00	41.95
39460 MSA Charlotte	7	1.32	0.00	0.00	6.26	0.00	76.48	85.71	17.26	14.29	0.00	2.91	76.36	20.73
45300 MSA Hillsborough	9	1.70	3.23	0.00	18.89	44.44	36.80	44.44	41.09	11.11	1.37	9.83	29.81	58.99
48424 MSA Palm Beach	23	4.34	2.96	0.00	22.08	21.74	36.12	39.13	38.83	39.13	0.83	10.57	33.90	54.70

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: 2012 FLORIDA STATE								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	0	0.00	1.83	0.00	41.59	0.00	39.49	0.00	17.08	0.00	4.00	54.00	32.00	10.00
<b>Limited Review:</b>														
19660 MSA Volusia	0	0.00	7.93	0.00	27.19	0.00	37.17	0.00	27.72	0.00	4.76	42.86	28.57	23.81
29460 MSA Polk	0	0.00	9.12	0.00	22.51	0.00	50.71	0.00	17.66	0.00	16.67	16.67	66.67	0.00
35840 MSA Manatee Sarasota	0	0.00	2.20	0.00	18.61	0.00	38.67	0.00	40.52	0.00	0.00	30.77	50.00	19.23
37340 MSA Brevard	0	0.00	5.84	0.00	24.02	0.00	44.56	0.00	25.58	0.00	11.76	29.41	29.41	29.41
39460 MSA Charlotte	0	0.00	0.00	0.00	10.92	0.00	69.38	0.00	19.69	0.00	0.00	0.00	83.33	16.67
45300 MSA Hillsborough	0	0.00	7.00	0.00	32.09	0.00	35.17	0.00	25.75	0.00	10.45	20.90	46.27	22.39
48424 MSA Palm Beach	0	0.00	6.39	0.00	31.55	0.00	33.58	0.00	28.47	0.00	4.00	38.00	30.00	28.00

\* Based on

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012 FLORIDA STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	0	0.00	0.63	0.00	23.76	0.00	38.63	0.00	36.97	0.00	0.68	24.87	36.80	37.65
<b>Limited Review:</b>														
19660 MSA Volusia	0	0.00	3.56	0.00	20.95	0.00	47.79	0.00	27.70	0.00	3.87	21.62	44.96	29.55
29460 MSA Polk	0	0.00	4.49	0.00	19.73	0.00	50.27	0.00	25.50	0.00	4.33	21.10	49.16	25.40
35840 MSA Manatee Sarasota	0	0.00	1.57	0.00	20.10	0.00	43.10	0.00	35.22	0.00	1.70	19.17	38.80	40.33
37340 MSA Brevard	0	0.00	1.67	0.00	22.43	0.00	42.74	0.00	33.11	0.00	1.74	24.23	38.94	35.10
39460 MSA Charlotte	0	0.00	0.00	0.00	6.72	0.00	78.73	0.00	14.55	0.00	0.00	6.68	78.31	15.01
45300 MSA Hillsborough	0	0.00	4.70	0.00	20.12	0.00	33.06	0.00	41.70	0.00	5.42	18.82	32.50	43.26
48424 MSA Palm Beach	0	0.00	3.63	0.00	18.82	0.00	31.37	0.00	46.00	0.00	3.65	16.92	30.72	48.71

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: 2012 FLORIDA STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	0	0.00	0.64	0.00	20.34	0.00	46.15	0.00	32.75	0.00	0.00	7.81	45.31	46.88
<b>Limited Review:</b>														
19660 MSA Volusia	0	0.00	1.45	0.00	20.60	0.00	51.62	0.00	26.33	0.00	0.00	12.50	45.83	41.67
29460 MSA Polk	0	0.00	1.97	0.00	21.26	0.00	51.15	0.00	25.62	0.00	2.38	28.57	50.00	19.05
35840 MSA Manatee Sarasota	0	0.00	1.55	0.00	18.19	0.00	48.53	0.00	31.72	0.00	0.00	16.28	44.19	39.53
37340 MSA Brevard	0	0.00	1.81	0.00	22.04	0.00	47.08	0.00	29.06	0.00	0.00	13.33	26.67	60.00
39460 MSA Charlotte	0	0.00	0.00	0.00	6.57	0.00	75.70	0.00	17.72	0.00	0.00	0.00	41.67	58.33
45300 MSA Hillsborough	0	0.00	2.74	0.00	18.77	0.00	39.01	0.00	39.45	0.00	3.17	20.63	34.92	41.27
48424 MSA Palm Beach	0	0.00	3.97	0.00	22.08	0.00	29.40	0.00	44.52	0.00	1.09	6.52	26.09	66.30

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: 2012 FLORIDA STATE								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>18</sup>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	340	50.60	20.08	12.50	18.64	22.62	20.77	22.92	40.51	41.96	8.39	19.99	23.80	47.83
<b>Limited Review:</b>														
19660 MSA Volusia	56	8.33	20.15	3.57	18.07	23.21	21.81	14.29	39.97	58.93	11.06	24.61	22.25	42.08
29460 MSA Polk	30	4.46	20.25	6.67	18.65	43.33	20.75	16.67	40.35	33.33	9.53	27.62	26.66	36.19
35840 MSA Manatee Sarasota	91	13.54	19.55	5.49	19.05	9.89	20.92	24.18	40.47	60.44	6.34	17.05	20.25	56.36
37340 MSA Brevard	13	1.93	19.36	15.38	18.76	15.38	21.46	30.77	40.42	38.46	11.00	20.07	23.25	45.68
39460 MSA Charlotte	22	3.27	16.43	4.55	19.62	13.64	25.30	22.73	38.65	59.09	6.85	18.13	21.42	53.61
45300 MSA Hillsborough	101	15.03	20.82	4.95	17.28	7.92	18.46	21.78	43.44	65.35	5.88	18.20	22.16	53.76
48424 MSA Palm Beach	19	2.83	21.50	5.26	17.84	0.00	18.93	26.32	41.73	68.42	7.98	18.07	20.57	53.37

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by BANK.

18 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: 2012 FLORIDA STATE						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>19</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
36740 MSA Lake Orange	12	92.31	20.08	0.00	18.64	27.27	20.77	18.18	40.51	54.55	13.93	23.22	22.95	39.89
<b>Limited Review:</b>														
19660 MSA Volusia	0	0.00	20.15	0.00	18.07	0.00	21.81	0.00	39.97	0.00	20.47	24.83	25.50	29.19
29460 MSA Polk	1	7.69	20.25	0.00	18.65	0.00	20.75	0.00	40.35	100.00	14.32	23.54	22.82	39.32
35840 MSA Manatee Sarasota	0	0.00	19.55	0.00	19.05	0.00	20.92	0.00	40.47	0.00	11.24	25.84	23.15	39.78
37340 MSA Brevard	0	0.00	19.36	0.00	18.76	0.00	21.46	0.00	40.42	0.00	16.87	21.08	24.70	37.35
39460 MSA Charlotte	0	0.00	16.43	0.00	19.62	0.00	25.30	0.00	38.65	0.00	14.66	28.45	25.86	31.03
45300 MSA Hillsborough	0	0.00	20.82	0.00	17.28	0.00	18.46	0.00	43.44	0.00	12.53	16.27	17.73	53.47
48424 MSA Palm Beach	0	0.00	21.50	0.00	17.84	0.00	18.93	0.00	41.73	0.00	9.25	16.07	23.54	51.14

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 7.7% of loans originated and purchased by BANK.

19 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: 2012 FLORIDA STATE				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				Aggregate Lending Data			
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>20</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****				
<b>Full Review:</b>														
36740 MSA Lake Orange	346	65.28	20.08	3.79	18.64	17.78	20.77	21.28	40.51	57.14	6.71	12.93	20.04	60.33
<b>Limited Review:</b>														
19660 MSA Volusia	59	11.13	20.15	10.17	18.07	15.25	21.81	22.03	39.97	52.54	9.44	18.18	24.01	48.38
29460 MSA Polk	13	2.45	20.25	16.67	18.65	16.67	20.75	16.67	40.35	50.00	7.31	14.76	23.94	53.99
35840 MSA Manatee Sarasota	57	10.75	19.55	1.75	19.05	12.28	20.92	31.58	40.47	54.39	6.88	13.77	21.77	57.58
37340 MSA Brevard	16	3.02	19.36	0.00	18.76	12.50	21.46	25.00	40.42	62.50	8.64	13.59	22.27	55.50
39460 MSA Charlotte	7	1.32	16.43	0.00	19.62	28.57	25.30	14.29	38.65	57.14	9.12	18.21	23.43	49.24
45300 MSA Hillsborough	9	1.70	20.82	0.00	17.28	22.22	18.46	44.44	43.44	33.33	4.72	10.37	16.89	68.02
48424 MSA Palm Beach	23	4.34	21.50	4.76	17.84	14.29	18.93	14.29	41.73	66.67	7.22	12.26	18.65	61.87

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by BANK.

20 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: 2012 FLORIDA STATE		Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
36740 MSA Lake Orange	0	0.00	76.60	0.00	0.00	0.00	0.00	26,748	10,309
<b>Limited Review:</b>									
19660 MSA Volusia	0	0.00	76.06	0.00	0.00	0.00	0.00	8,015	3,340
29460 MSA Polk	0	0.00	76.98	0.00	0.00	0.00	0.00	7,355	2,604
35840 MSA Manatee Sarasota	0	0.00	77.01	0.00	0.00	0.00	0.00	15,048	6,318
37340 MSA Brevard	0	0.00	70.03	0.00	0.00	0.00	0.00	8,750	3,308
39460 MSA Charlotte	0	0.00	77.65	0.00	0.00	0.00	0.00	2,878	1,082
45300 MSA Hillsborough	0	0.00	74.78	0.00	0.00	0.00	0.00	21,784	8,757
48424 MSA Palm Beach	0	0.00	76.24	0.00	0.00	0.00	0.00	38,337	16,132

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\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: 2012 FLORIDA STATE			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
36740 MSA Lake Orange	0	0.00	96.86	0.00	0.00	0.00	0.00	65	33
<b>Limited Review:</b>									
19660 MSA Volusia	0	0.00	98.42	0.00	0.00	0.00	0.00	27	14
29460 MSA Polk	0	0.00	96.63	0.00	0.00	0.00	0.00	43	22
35840 MSA Manatee Sarasota	0	0.00	96.69	0.00	0.00	0.00	0.00	43	21
37340 MSA Brevard	0	0.00	98.28	0.00	0.00	0.00	0.00	15	7
39460 MSA Charlotte	0	0.00	98.36	0.00	0.00	0.00	0.00	12	7
45300 MSA Hillsborough	0	0.00	96.47	0.00	0.00	0.00	0.00	67	33
48424 MSA Palm Beach	0	0.00	96.42	0.00	0.00	0.00	0.00	96	49

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\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2012).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: 2012 FLORIDA STATE				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013			
AA:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
36740 MSA Lake Orange	5	24	14	55	19	79	0.00	0	0
<b>Limited Review:</b>									
19660 MSA Volusia	0	0	0	0	0	0	0.00	0	0
29460 MSA Polk	0	0	0	0	0	0	0.00	0	0
35840 MSA Manatee Sarasota	0	0	1	3.5	1	3.5	0.00	0	0
37340 MSA Brevard	0	0	0	0	0	0	0.00	0	0
39460 MSA Charlotte	0	0	0	0	0	0	0.00	0	0
45300 MSA Hillsborough	0	0	0	0	0	0	0.00	0	0
48424 MSA Palm Beach	0	0	0	0	0	0	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2012 TO JUNE 30, 2013								Geography: 2012 FLORIDA STATE				Evaluation Period:					
AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
36740 MSA Lake Orange	56.79%	32	72.7%	0.00	15.6%	40.6%	43.8%	1	0	0	0	+1	0	1.09	26.67	41.33	30.90
<b>Limited Review:</b>																	
19660 MSA Volusia	7.19%	2	4.55%	0.00	50%	0.00	50%	0	0	0	0	0	0	3.15	20.14	52.85	23.86
29460 MSA Polk	1.95%	2	4.55%	0.00	0.00	50%	50%	0	0	0	0	0	0	2.08	23.27	52.70	21.96
35840 MSA Manatee Sarasota	24.96%	4	9.09%	0.00	50%	25%	25%	0	0	0	0	0	0	2.67	23.45	46.77	27.11
37340 MSA Brevard	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	2.39	20.42	47.51	29.68
39460 MSA Charlotte	2.99%	1	2.27%	0.00	0.00	100%	0.00	0	0	0	0	0	0	0.00	7.06	76.70	16.23
45300 MSA Hillsborough	5.59%	2	4.55%	0.00	0.00	100%	0.00	1	0	0	0	+1	0	6.12	23.79	34.78	34.89
48424 MSA Palm Beach	.54%	1	2.27%	0.00	100%	0.00	0.00	1	0	0	+1	0	0	4.88	26.01	33.30	35.59

## Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM				Geography: 2012 FLORIDA STATE				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013									
AA:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
36740 MSA Lake Orange	56.79%	32	72.7%	0.00	15.6%	40.6%	43.8%	32	146	0	5	13	14	1.09	26.67	41.33	30.90
<b>Limited Review:</b>																	
19660 MSA Volusia	7.19%	2	4.55%	0.00	50%	0.00	50%	2	146	0	0	0	0	3.15	20.14	52.85	23.86
29460 MSA Polk	1.95%	2	4.55%	0.00	0.00	50%	50%	2	146	0	0	1	1	2.08	23.27	52.70	21.96
35840 MSA Manatee Sarasota	24.96%	4	9.09%	0.00	50%	25%	25%	4	146	0	2	1	1	2.67	23.45	46.77	27.11
37340 MSA Brevard	0.00	0	0.00	0.00	0.00	0.00	0.00	0	146	0	0	0	0	2.39	20.42	47.51	29.68
39460 MSA Charlotte	2.99%	1	2.27%	0.00	0.00	100%	0.00	1	146	0	0	1	0	0.00	7.06	76.70	16.23
45300 MSA Hillsborough	5.59%	2	4.55%	0.00	0.00	100%	0.00	2	146	0	0	2	0	6.12	23.79	34.78	34.89
48424 MSA Palm Beach	.54%	1	2.27%	0.00	100%	0.00	0.00	1	146	0	1	0	0	4.88	26.01	33.30	35.59

Institution ID: TRUSTCO BANK (10000707635)

**19660 MSA Volusia**

Demographic Information for Limited Scope Area: 19660 MSA Volusia						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	113	4.42	20.35	53.10	22.12	0.00
Population by Geography	494,593	3.15	20.14	52.85	23.86	0.00
Owner-Occupied Housing by Geography	152,160	1.29	15.68	54.75	28.28	0.00
Business by Geography	71,075	3.56	20.95	47.79	27.70	0.00
Farms by Geography	2,408	1.45	20.60	51.62	26.33	0.00
Family Distribution by Income Level	126,653	20.15	18.07	21.81	39.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	48,410	4.42	27.51	51.82	16.25	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		55,569 57,900 13%	Median Housing Value Unemployment Rate (2010 US Census)		199,687 3.68%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635)

**48424 MSA Palm Beach**

Demographic Information for Limited Scope Area: 48424 MSA Palm Beach						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	337	6.23	24.93	31.45	35.01	2.37
Population by Geography	1,320,134	4.88	26.01	33.30	35.59	0.22
Owner-Occupied Housing by Geography	384,995	2.96	22.08	36.12	38.83	0.00
Business by Geography	253,649	3.63	18.82	31.37	46.00	0.19
Farms by Geography	4,915	3.97	22.08	29.40	44.52	0.04
Family Distribution by Income Level	324,849	21.50	17.84	18.93	41.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	127,797	8.13	36.53	34.23	21.11	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,445 64,100 11%	Median Housing Value Unemployment Rate (2010 US Census)		288,519 4.38%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635)

**45300 MSA Hillsborough**

Demographic Information for Limited Scope Area: 45300 MSA Hillsborough						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	320	7.81	22.50	36.25	30.94	2.50
Population by Geography	1,229,226	6.12	23.79	34.78	34.89	0.42
Owner-Occupied Housing by Geography	292,728	3.23	18.89	36.80	41.09	0.00
Business by Geography	172,632	4.70	20.12	33.06	41.70	0.41
Farms by Geography	3,686	2.74	18.77	39.01	39.45	0.03
Family Distribution by Income Level	295,936	20.82	17.28	18.46	43.44	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	112,751	10.88	35.45	34.85	18.82	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		57,333 56,400 13%	Median Housing Value Unemployment Rate (2010 US Census)		209,998 4.42%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635)

**39460 MSA Charlotte**

Demographic Information for Limited Scope Area: 39460 MSA Charlotte						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	38	0.00	7.89	71.05	21.05	0.00
Population by Geography	159,978	0.00	7.06	76.70	16.23	0.00
Owner-Occupied Housing by Geography	58,377	0.00	6.26	76.48	17.26	0.00
Business by Geography	24,516	0.00	6.72	78.73	14.55	0.00
Farms by Geography	852	0.00	6.57	75.70	17.72	0.00
Family Distribution by Income Level	48,044	16.43	19.62	25.30	38.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	17,321	0.00	9.36	79.93	10.70	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		52,533 55,800 10%	Median Housing Value Unemployment Rate (2010 US Census)		209,325 4.55%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635)

**37340 MSA Brevard**

Demographic Information for Limited Scope Area: 37340 MSA Brevard						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	113	3.54	22.12	46.02	26.55	1.77
Population by Geography	543,376	2.39	20.42	47.51	29.68	0.00
Owner-Occupied Housing by Geography	168,706	1.18	18.83	46.92	33.06	0.00
Business by Geography	81,707	1.67	22.43	42.74	33.11	0.04
Farms by Geography	2,264	1.81	22.04	47.08	29.06	0.00
Family Distribution by Income Level	145,109	19.36	18.76	21.46	40.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	55,313	4.34	27.88	47.61	20.16	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		60,842 58,600 10%	Median Housing Value Unemployment Rate (2010 US Census)		197,498 4.22%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635)

**36740 MSA Lake Orange**

Demographic Information for Full Scope Area: 36740 MSA Lake Orange						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	389	2.06	27.25	39.33	31.11	0.26
Population by Geography	2,134,411	1.09	26.67	41.33	30.90	0.01
Owner-Occupied Housing by Geography	505,982	0.48	20.03	43.77	35.71	0.01
Business by Geography	332,457	0.63	23.76	38.63	36.97	0.01
Farms by Geography	7,837	0.64	20.34	46.15	32.75	0.11
Family Distribution by Income Level	521,311	20.08	18.64	20.77	40.51	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	201,865	1.82	39.02	42.17	16.98	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		58,474 58,200 12%	Median Housing Value Unemployment Rate (2010 US Census)		224,608 4.52%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635)

**35840 MSA Manatee Sarasota**

Demographic Information for Limited Scope Area: 35840 MSA Manatee Sarasota						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	172	2.33	24.42	45.35	27.91	0.00
Population by Geography	702,281	2.67	23.45	46.77	27.11	0.00
Owner-Occupied Housing by Geography	228,050	1.26	20.07	48.99	29.68	0.00
Business by Geography	114,487	1.57	20.10	43.10	35.22	0.00
Farms by Geography	2,963	1.55	18.19	48.53	31.72	0.00
Family Distribution by Income Level	188,229	19.55	19.05	20.92	40.47	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	72,663	4.42	32.53	46.69	16.36	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		60,626 59,900 10%	Median Housing Value Unemployment Rate (2010 US Census)		266,801 4.10%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

Institution ID: TRUSTCO BANK (10000707635)

**29460 MSA Polk**

Demographic Information for Limited Scope Area: 29460 MSA Polk						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	154	3.25	23.38	49.35	23.38	0.65
Population by Geography	602,095	2.08	23.27	52.70	21.96	0.00
Owner-Occupied Housing by Geography	161,208	1.27	19.20	54.65	24.88	0.00
Business by Geography	62,603	4.49	19.73	50.27	25.50	0.00
Farms by Geography	2,436	1.97	21.26	51.15	25.62	0.00
Family Distribution by Income Level	157,222	20.25	18.65	20.75	40.35	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	61,160	3.25	33.03	50.65	13.07	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		51,395 54,500 14%	Median Housing Value Unemployment Rate (2010 US Census)		138,997 4.20%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

## State of Massachusetts

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: REVISED 2011 BERKSHIR						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
2011 38340 Berkshire MA	100.00	30	4,490	2	177	0	0	0	0	32	4,667	100

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: REVISED 2011 BERKSHIR						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA (2011):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2011 38340 Berkshire MA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: REVISED 2011 BERKSHIR		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
AA (2011):					
<b>Full Review:</b>					
2011 38340 Berkshire MA	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: REVISED 2011 BERKSHIR					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 38340 Berkshire MA	12	100.00	0.62	0.00	12.05	16.67	71.43	75.00	15.89	8.33	0.50	13.76	71.09	14.65

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 BERKSHIR						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 38340 Berkshire MA	2	100.00	0.62	0.00	12.05	0.00	71.43	100.00	15.89	0.00	0.55	11.85	71.63	15.98

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: REVISED 2011 BERKSHIR				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 38340 Berkshire MA	16	100.00	0.62	0.00	12.05	6.25	71.43	81.25	15.89	12.50	0.10	7.91	73.74	18.26

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: REVISED 2011 BERKSHIR						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 38340 Berkshire MA	0	0.00	15.95	0.00	32.01	0.00	38.37	0.00	13.67	0.00	7.69	38.46	38.46	15.38

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: REVISED 2011 BERKSHIR				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011									
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income																
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp													
<b>Full Review:</b>																											
2011 38340 Berkshire MA	2	100.00	7.44	0.00	14.38	0.00	62.54	100.00	15.64	0.00	6.65	11.66	64.71	16.98													

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS												Geography: REVISED 2011 BERKSHIR				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income								
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp					
<b>Full Review:</b>																			
2011 38340 Berkshire MA	0	0.00	1.01	0.00	8.06	0.00	73.80	0.00	17.13	0.00	0.00	11.11	44.44	44.44					

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: REVISED 2011 BERKSHIR						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>21</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 38340 Berkshire MA	12	100.00	18.39	0.00	19.87	50.00	23.55	25.00	38.18	25.00	8.46	23.34	23.66	44.54

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>21</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 BERKSHIR						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>22</sub>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 38340 Berkshire MA	2	100.0 0	18.39	0.00	19.87	0.00	23.55	50.00	38.18	50.00	11.85	22.25	25.43	40.46

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

22 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: REVISED 2011 BERKSHIR				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data										
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>23</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp							
<b>Full Review:</b>																					
2011 38340 Berkshire MA	16	100.0 0	18.39	12.50	19.87	18.75	23.55	18.75	38.18	50.00	6.94	16.44	21.35	55.27							

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

23 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: REVISED 2011 BERKSHIR			Evaluation Period: J ANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 38340 Berkshire MA	2	100.00	67.27	0.00	50.00	50.00	0.00	2,278	909

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: REVISED 2011 BERKSHIR			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 38340 Berkshire MA	0	0.00	96.73	0.00	0.00	0.00	0.00	9	3

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: REVISED 2011 BERKSHIR				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2011 38340 Berkshire MA	0	0	2	3	2	3	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2011 TO DECEMBER 31, 2011								Geography: REVISED 2011 BERKSHIR				Evaluation Period:					
AA:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																	
2011 38340 Berkshire MA	100%	4	100%	0.00	0.00	75%	25%	0	0	0	0	0	0	2.72	16.73	65.66	14.90

\*As of June 30,2012

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM DECEMBER 31, 2011				Geography: REVISED 2011 BERKSHIR				Evaluation Period: JANUARY 1, 2011 TO									
AA:	Deposits	Branches				ATMs				Population							
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2011 38340 Berkshire MA	100%	4	100%	0.00	0.00	75%	25%	4	146	0	0	3	1	2.72	16.73	65.66	14.90

\*As of June 30,2012

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 38340 Berkshire MA**

Demographic Information for Full Scope Area: 2011 38340 Berkshire MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	41	2.44	19.51	63.41	14.63	0.00
Population by Geography	134,953	2.72	16.73	65.66	14.90	0.00
Owner-Occupied Housing by Geography	37,488	0.62	12.05	71.43	15.89	0.00
Business by Geography	13,974	7.44	14.38	62.54	15.64	0.00
Farms by Geography	397	1.01	8.06	73.80	17.13	0.00
Family Distribution by Income Level	35,225	18.39	19.87	23.55	38.18	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	13,478	3.18	23.35	64.44	9.03	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		50,150 68,900 10%	Median Housing Value Unemployment Rate (2000 US Census)		124,145 2.62%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

## State of Massachusetts

**Institution ID:** TRUSTCO BANK (10000707635)

**Table 1. Lending Volume**

LENDING VOLUME		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
38340 MSA Berkshire	100.00	40	6,112	0	0	0	0	0	0	40	6,112	100

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA (2012):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
38340 MSA Berkshire	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: 2012 BERKSHIRE MA		Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013	
	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
AA (2012):					
<b>Full Review:</b>					
38340 MSA Berkshire	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	7	100.00	0.63	0.00	6.91	0.00	69.52	100.00	22.94	0.00	0.77	7.36	71.01	20.86

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	0	0.00	0.63	0.00	6.91	0.00	69.52	0.00	22.94	0.00	0.20	7.07	72.89	19.84

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013					
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	33	100.00	0.63	0.00	6.91	0.00	69.52	72.73	22.94	27.27	0.45	4.15	70.47	24.94

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	0	0.00	18.58	0.00	14.84	0.00	50.87	0.00	15.70	0.00	33.33	18.52	37.04	11.11

\* Based on

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	0	0.00	7.55	0.00	8.14	0.00	62.65	0.00	21.65	0.00	6.19	9.02	63.97	20.83

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	0	0.00	0.74	0.00	6.68	0.00	68.56	0.00	24.01	0.00	0.00	0.00	73.33	26.67

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>24</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	7	100.00	21.78	0.00	17.02	42.86	22.60	28.57	38.61	28.57	10.91	27.11	21.90	40.08

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>24</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>25</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
38340 MSA Berkshire	0	0.00	21.78	0.00	17.02	0.00	22.60	0.00	38.61	0.00	12.27	23.31	26.79	37.63

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

25 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: 2012 BERKSHIRE MA				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				Aggregate Lending Data			
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>26</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****				
<b>Full Review:</b>														
38340 MSA Berkshire	33	100.00	21.78	0.00	17.02	21.21	22.60	36.36	38.61	42.42	5.16	15.82	23.82	55.21

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

26 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES JUNE 30, 2013			Geography: 2012 BERKSHIRE MA			Evaluation Period: JANUARY 1, 2012 TO			
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
38340 MSA Berkshire	0	0.00	70.95	0.00	0.00	0.00	0.00	2,835	1,017

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: 2012 BERKSHIRE MA			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
38340 MSA Berkshire	0	0.00	96.78	0.00	0.00	0.00	0.00	17	6

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2012).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: 2012 BERKSHIRE MA				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013			
AA:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
38340 MSA Berkshire	2	3	1	5	3	8	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2012 TO JUNE 30, 2013								Geography: 2012 BERKSHIRE MA				Evaluation Period:					
AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
38340 MSA Berkshire	100%	4	100%	0.00	0.00	75%	25%	0	0	0	0	0	0	2.58	10.63	66.83	19.95

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM		Geography: 2012 BERKSHIRE MA						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013									
AA:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
38340 MSA Berkshire	100%	4	100%	0.00	0.00	75%	25%	4	146	0	0	3	1	2.58	10.63	66.83	19.95

Institution ID: TRUSTCO BANK (10000707635)

**38340 MSA Berkshire**

Demographic Information for Full Scope Area: 38340 MSA Berkshire						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	39	2.56	10.26	66.67	20.51	0.00
Population by Geography	131,219	2.58	10.63	66.83	19.95	0.00
Owner-Occupied Housing by Geography	38,332	0.63	6.91	69.52	22.94	0.00
Business by Geography	13,388	7.55	8.14	62.65	21.65	0.00
Farms by Geography	404	0.74	6.68	68.56	24.01	0.00
Family Distribution by Income Level	33,202	21.78	17.02	22.60	38.61	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,882	3.70	16.88	67.44	11.99	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,783 69,800 12%	Median Housing Value Unemployment Rate (2010 US Census)		227,331 3.93%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2012 HUD updated MFI

# State of Vermont

**Institution ID: TRUSTCO BANK (1000707635) (Included)**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: REVISED 2011 VERMONT						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA (2011):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
2011 NonMSA VT Bennington	100.00	14	1,881	0	0	0	0	0	0	14	1,881	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: REVISED 2011 VERMONT						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA (2011):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
2011 NonMSA VT Bennington	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: REVISED 2011 VERMONT		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
AA (2011):	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
2011 NonMSA VT Bennington	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2011		Geography: REVISED 2011 VERMONT								Evaluation Period: JANUARY 1, 2011 TO				
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 NonMSA VT Bennington	3	100.00	0.00	0.00	14.97	0.00	62.36	100.00	22.66	0.00	0.00	18.94	51.83	29.24

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 VERMONT						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 NonMSA VT Bennington	0	0.00	0.00	0.00	14.97	0.00	62.36	0.00	22.66	0.00	0.00	17.65	64.71	17.65

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: REVISED 2011 VERMONT						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 NonMSA VT Bennington	11	100.00	0.00	0.00	14.97	36.36	62.36	63.64	22.66	0.00	0.00	7.40	47.11	45.50

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: REVISED 2011 VERMONT						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 NonMSA VT Bennington	0	0.00	0.00	0.00	48.40	0.00	19.01	0.00	32.60	0.00	0.00	66.67	33.33	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES TO DECEMBER 31, 2011		Geography: REVISED 2011 VERMONT								Evaluation Period: JANUARY 1, 2011				
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 NonMSA VT Bennington	0	0.00	0.00	0.00	22.34	0.00	44.42	0.00	33.25	0.00	0.00	16.11	39.48	44.40

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS														Geography: REVISED 2011 VERMONT				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income										
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp							
<b>Full Review:</b>																					
2011 NonMSA VT Bennington	0	0.00	0.00	0.00	10.61	0.00	60.89	0.00	28.49	0.00	0.00	12.50	62.50	25.00							

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: REVISED 2011 VERMONT						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>27</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 NonMSA VT Bennington	3	100.00	18.30	0.00	18.60	66.67	23.19	33.33	39.90	0.00	7.52	24.06	22.56	45.86

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>27</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: REVISED 2011 VERMONT						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>28</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
2011 NonMSA VT Bennington	0	0.00	18.30	0.00	18.60	0.00	23.19	0.00	39.90	0.00	6.25	33.33	27.08	33.33

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

28 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: REVISED 2011 VERMONT				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				Aggregate Lending Data			
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>29</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****				
<b>Full Review:</b>														
2011 NonMSA VT Bennington	11	100.00	18.30	9.09	18.60	45.45	23.19	18.18	39.90	27.27	6.18	16.73	16.91	60.18

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

29 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: REVISED 2011 VERMONT			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 NonMSA VT Bennington	0	0.00	69.50	0.00	0.00	0.00	0.00	849	379

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: REVISED 2011 VERMONT			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
2011 NonMSA VT Bennington	0	0.00	96.65	0.00	0.00	0.00	0.00	9	2

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: REVISED 2011 VERMONT				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
AA:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
2011 NonMSA VT Bennington	0	0	1	6	1	6	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2011 TO DECEMBER 31, 2011								Geography: REVISED 2011 VERMONT				Evaluation Period:					
AA:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																	
2011 NonMSA VT Bennington	100	1	100%	0.00	100%	0.00	0.00	0	0	0	0	0	0	0.00	20.99	58.79	20.21

\*As of June 30,2012

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM																	
Geography: REVISED 2011 VERMONT																	
Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011																	
AA:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
2011 NonMSA VT Bennington	100	1	100	0.00	100	0.00	0.00	2	146	0	1	1	0	0.00	20.99	58.79	20.21

**Institution ID: TRUSTCO BANK (10000707635) (Included)**

**2011 NonMSA VT Bennington**

Demographic Information for Full Scope Area: 2011 NonMSA VT Bennington						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	16.67	58.33	25.00	0.00
Population by Geography	36,994	0.00	20.99	58.79	20.21	0.00
Owner-Occupied Housing by Geography	10,599	0.00	14.97	62.36	22.66	0.00
Business by Geography	4,593	0.00	22.34	44.42	33.25	0.00
Farms by Geography	179	0.00	10.61	60.89	28.49	0.00
Family Distribution by Income Level	9,960	18.30	18.60	23.19	39.90	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,676	0.00	29.65	56.91	13.44	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		46,084 62,900 10%	Median Housing Value Unemployment Rate (2000 US Census)		129,842 2.44%	

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2011 HUD updated MFI

# State of Vermont

**Institution ID:** TRUSTCO BANK (10000707635)

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Non MSA VT Bennington	100.00	32	5,197	0	0	0	0	0	0	32	5,197	100.00

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: NONMSA VT BENNINGTON								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA (2012):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
NonMSA VT Bennington	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of June 30, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

\*\*\* Deposit Data as of August 14, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: NONMSA VT BENNINGTON		Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013	
	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>AA (2012):</b>					
<b>Full Review:</b>					
NonMSA VT Bennington	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to June 30, 2013.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>1</sup>			
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	7	100.00	0.00	0.00	17.85	0.00	61.43	100.00	20.72	0.00	0.00	12.57	67.71	19.71

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: NONMSA VT BENNINGTON								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	0	0.00	0.00	0.00	17.85	0.00	61.43	0.00	20.72	0.00	0.00	19.48	67.53	12.99

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013					
AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>1</sup>			
	#	% of Total <sup>2</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans <sup>4</sup>	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	% Owner Occ Units <sup>3</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	25	100.00	0.00	0.00	17.85	36.00	61.43	64.00	20.72	0.00	0.00	12.48	60.35	27.17

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: TRUSTCO BANK (10000707635)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>1</sup>			
	#	% of Total <sup>2</sup>	% of MF Units <sup>3</sup>	% BANK Loans <sup>4</sup>	% MF Units <sup>2*</sup>	% BANK Loans	% MF Units <sup>3**</sup>	% BANK Loans	% MF Units <sup>3**</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	0	0.00	0.00	0.00	42.62	0.00	35.78	0.00	21.60	0.00	0.00	66.67	33.33	0.00

\* Based on

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: NONMSA VT BENNINGTON				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013			
AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp							
<b>Full Review:</b>																					
NonMSA VT Bennington	0	0.00	0.00	0.00	21.73	0.00	49.50	0.00	28.77	0.00	0.00	20.98	46.44	32.59							

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	0	0.00	0.00	0.00	15.87	0.00	60.32	0.00	23.81	0.00	0.00	0.00	60.00	40.00

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2012).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>30</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	7	100.00	18.77	0.00	19.57	0.00	21.53	42.86	40.13	57.14	7.89	18.75	25.00	48.36

\* Based on

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>30</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>31</sub>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	0	0.00	18.77	0.00	19.57	0.00	21.53	0.00	40.13	0.00	13.89	25.00	16.67	44.44

\* Based on

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

31 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NONMSA VT BENNINGTON						Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013						
AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>32</sub>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
NonMSA VT Bennington	25	100.00	18.77	0.00	19.57	33.33	21.53	20.83	40.13	45.83	4.28	16.14	19.44	60.13

\* Based on

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by BANK.

32 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NONMSA VT BENNINGTON			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
NonMSA VT Bennington	0	0.00	73.73	0.00	0.00	0.00	0.00	838	310

\* Based on

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2012).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NONMSA VT BENNINGTON			Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013				
AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
NonMSA VT Bennington	0	0.00	96.83	0.00	0.00	0.00	0.00	5	1

\* Based on

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2012).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NONMSA VT BENNINGTON				Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013			
AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
NonMSA VT Bennington	1	6	1	6	2	12	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2012 TO JUNE 30, 2013								Geography: NONMSA VT BENNINGTON				Evaluation Period:					
AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
NonMSA VT Bennington	100	1	100	0.00	100	0.00	0.00	0	0	0	1	1	0	0.00	22.78	59.92	17.30

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM																	
Geography: NONMSA VT BENNINGTON								Evaluation Period: JANUARY 1, 2012 TO JUNE 30, 2013									
AA:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
NonMSA VT Bennington	0.00	0	0.00	0	0	0	0	0	0.00	0	0	0	0	0.00	22.78	59.92	17.30

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**NonMSA VT Bennington**

Demographic Information for Full Scope Area: NonMSA VT Bennington						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	25.00	58.33	16.67	0.00
Population by Geography	37,125	0.00	22.78	59.92	17.30	0.00
Owner-Occupied Housing by Geography	11,291	0.00	17.85	61.43	20.72	0.00
Business by Geography	4,400	0.00	21.73	49.50	28.77	0.00
Farms by Geography	189	0.00	15.87	60.32	23.81	0.00
Family Distribution by Income Level	10,060	18.77	19.57	21.53	40.13	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,857	0.00	34.46	53.25	12.29	0.00
Median Family Income		60,519	Median Housing Value		242,709	
HUD Adjusted Median Family Income for 2012		63,800	Unemployment Rate (2010 US Census)		3.27%	
Households Below Poverty Level		11%				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2010 US Census and 2012 HUD updated MFI

