



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

July 1, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Harris National Association
Charter Number: 14583

111 West Monroe Street
Chicago, Illinois 60603

Office of the Comptroller of the Currency

Large Bank Supervision
250 E Street, SW
Washington D.C. 20219

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of **Harris National Association (HNA)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Harris National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
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:

- Excellent level of lending activity;
- Adequate geographic distribution of HMDA loans and small loans to businesses;
- Good borrower distribution of HMDA loans;
- Excellent borrower distribution of small loans to businesses;
- Positive impact of community development lending;
- Good volume of investment activity;
- Reasonable accessibility of office locations; and
- A good 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/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts 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/assessment area.

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 (MD): 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 (MSA): 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.

Multi-family: 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

Harris National Association (HNA), headquartered in Chicago, Illinois, is a full-service interstate bank that is a wholly-owned subsidiary of Harris Bankcorp, Inc. Harris Bankcorp, Inc. is a wholly-owned subsidiary of Harris Financial Corp, which is a subsidiary of BMO Financial Group (BMO). BMO is a Canadian-based North American bank with \$386 (CND) billion in assets as of July 31, 2009.

HNA reported total assets of \$41.6 billion as of June 30, 2009. This includes total loans of \$24.3 billion which are comprised of \$16 billion in real estate related loans (66 percent of total loans), loans to individuals of \$4.4 billion (18 percent), commercial loans of \$2.9 billion (12 percent), and other loans of \$1 billion (4 percent). Total Tier One Capital is \$3.5 billion.

HNA received a Satisfactory rating in its last CRA evaluation dated July 1, 2006 by the Office of the Comptroller of the Currency. At that time HNA was an intrastate bank with all branches located in Illinois. Subsequent to that evaluation, Harris Bankcorp, Inc. acquired First National Bank & Trust Bank of Kokomo Indiana (January 4, 2007), Ozaukee National Bank of Ozaukee, Wisconsin (February 29, 2008) and the Community Bank Group headquartered in Milwaukee, Wisconsin (February 29, 2008). Eventually, each of these institutions was merged into HNA. As a result of these acquisitions, HNA is now considered an interstate bank for CRA purposes.

HNA offers a full range of real estate, commercial, consumer credit products and services, as well as trust services, and deposit products and services. Its activities, together with those products and services offered through its affiliates, provide a wide-range of lending, investing and financial management solutions to personal, business, corporate and institutional clients.

HNA acquired a subsidiary, Lincoln Neighborhood Redevelopment Co. (LNRC), as part of the acquisition and merger of the Community Bank Group. LNRC is a 501(c)(3) nonprofit organization which primarily makes small business loans. Activities of LNRC were considered in this evaluation. Other subsidiaries of HNA have no negative impact on the bank's ability to meet the credit needs in the community.

HNA has 17 assessment areas (AAs) covering the three AAs within the Chicago-Naperville-Joliet, IL-IN-WI multistate metropolitan area (MMA); the state of Indiana (six AAs); and the state of Wisconsin (eight AAs). HNA has 302 office locations and 449 ATMs within its AAs.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs within its communities.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Chicago-Naperville-Joliet, IL-IN-WI MMA

We reviewed HNA's origination and purchase of home mortgage loans and small loans to businesses and farms for the time period of January 1, 2006 through December 31, 2008. Community Development loans were reviewed from July 1, 2006 through June 30, 2009.

Our review of investments included an analysis of the investment portfolio and the donations and grants made between July 1, 2006 and June 30, 2009. We considered investments and donations or grants to organizations that have community development as their primary purpose.

Our evaluation of bank services included analyzing the bank's branch and ATM network for the availability and effectiveness of delivering retail banking services. We also considered the extent and innovativeness of the bank's community development services in meeting the credit needs within its assessment area. We reviewed bank services, including branch openings and closings, and community development services occurring between July 1, 2006 and June 30, 2009.

State of Indiana

We reviewed HNA's origination and purchase of home mortgage loans and small loans to businesses and farms for the time period of January 1, 2007 through December 31, 2008. Community Development loans were reviewed from January 4, 2007 through June 30, 2009.

Our review of investments included an analysis of the investment portfolio and the donations and grants made between January 4, 2007 and June 30, 2009. We considered investments and donations or grants to organizations that have community development as their primary purpose.

Our evaluation of bank services included analyzing the bank's branch and ATM network for the availability and effectiveness of delivering retail banking services. We also considered the extent and innovativeness of the bank's community development services in meeting the credit needs within its assessment area. We reviewed bank services, including branch openings and closings, and community development services occurring between January 4, 2007 and June 30, 2009.

State of Wisconsin

We reviewed HNA's origination and purchase of home mortgage loans and small loans to businesses and farms for the time period of January 1, 2008 through December 31, 2008. Community Development loans were reviewed from February 29, 2008 through June 30, 2009.

Our review of investments included an analysis of the investment portfolio and the donations and grants made between February 29, 2008 and June 30, 2009. We considered investments

and donations or grants to organizations that have community development as their primary purpose.

Our evaluation of bank services included analyzing the bank's branch and ATM network for the availability and effectiveness of delivering retail banking services. We also considered the extent and innovativeness of the bank's community development services in meeting the credit needs within its assessment area. We reviewed bank services, including branch openings and closings, and community development services occurring between February 29, 2008 and June 30, 2009.

Data Integrity

We verified the accuracy of the publicly filed home mortgage loans and small loans to businesses and farms. HNA had no significant errors in its data that would preclude an accurate evaluation of its CRA performance.

We also verified information on community development loans, qualified investments, and community development services to ensure that these activities met the regulatory definitions. HNA accurately identified its activities submitted to us for consideration. We determined which community development loans, investments and services met the definition of community development and included those under the Lending, Investment, or Services Test, respectively.

Selection of Areas for Full-Scope Review

The Chicago AA accounted for 91.5 percent of HNA's deposits in the Chicago-Naperville-Joliet, IL-IN-WI MMA and 84 percent of HNA's total deposits. The Chicago AA was selected for a full-scope review.

In the state of Indiana, the Indianapolis AA accounted for 45 percent of HNA's deposits within that state and was selected for a full-scope review.

In the state of Wisconsin, the Milwaukee AA accounted for 72.2 percent of HNA's deposits and was selected for a full-scope review.

All AAs not selected for full-scope reviews were examined as a limited-scope area.

Inside/Outside Ratio

The ratio of loans made inside/outside the AAs was evaluated at the bank level and excluded affiliate activity. This evaluation determined that 96 percent of all small loans to businesses, 83.5 percent of all small loans to farms, and 100 percent of all community development loans were made within the bank's AAs. We also determined that 91.5 percent of all mortgages were made within the bank's AAs, including 83.8% of home purchase loans, 96.1% of home improvement loans, and 94.3% of home refinance loans.

Ratings

The bank's overall rating is a blend of the MMA rating and state ratings. The rating for the Chicago-Naperville-Joliet, IL-IN-WI MMA carried the greatest weight in our overall conclusions due to this area representing the bank's most significant market in terms of deposit concentration with nearly 92 percent of HNA's deposits. Within the Chicago-Naperville-Joliet, IL-IN-WI MMA, the Chicago AA carried the greatest weight because this area represents 91.5 percent of deposits. The MMA rating and state ratings are based primarily on those areas that received full-scope reviews, but with consideration also given to the bank's performance in areas receiving limited-scope reviews. Within the state of Indiana, the rating for that state was primarily based on activities in the Indianapolis AA; however, the influence on HNA's overall rating was limited as HNA's deposits in that state account for only 3.6 percent of HNA's total deposits. Within the state of Wisconsin, the rating is primarily based on activities in the Milwaukee AA; however, the influence on HNA's overall rating was limited as HNA's deposits in that state account for only 4.8 percent of HNA's total deposits.

For each full-scope rating area, when determining the Lending Test conclusion by AA, HMDA loan products were weighted slightly more than small business or small farm loans. The combined geographic and borrower distribution of HMDA loans, small business and small farm loans provided the most weight to AA Lending Test conclusions with market share information accounting for a lesser weight. Expectations for lending to low-income borrowers were slightly lower than for lending to moderate-income borrowers due to performance context issues such as the percentage of the population living below the poverty level. Community development lending, based on volume and complexity, and the use of innovative and flexible lending programs provided either a neutral or positive impact to AA conclusions.

In arriving at a conclusion, there are some AAs in which the total number of loans made totaled ten loans or less. In those instances, a meaningful analysis could not be completed and this had a neutral impact on the overall ratings.

When determining Investment Test AA conclusions, investment and contribution activity and responsiveness to community development needs were given the most weight. Qualitative factors, such as complexity and innovation were also considered.

When determining Service Test conclusions, accessibility to branch offices and changes in branch locations provided the most weight. Branch hours and services as well as community development services received a lesser amount of weight.

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

Chicago-Naperville-Joliet MMA:

CRA rating for the Chicago-Naperville-Joliet, IL-IN-WI MMA¹:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent level of lending activity;
- Adequate geographic distribution of HMDA loans and small loans to businesses;
- Good borrower distribution of HMDA loans;
- Excellent borrower distribution of small loans to businesses;
- Positive impact of community development lending;
- Good volume of investment activity;
- Reasonable accessibility of office locations combined with an excellent record of opening offices; and
- An excellent level of community development services.

Description of Institution's Operations in the Chicago-Naperville-Joliet, IL-IN-WI MMA

HNA has delineated three AAs within this MMA. Each is a separate metropolitan division. Within this MMA, HNA holds over \$24 billion of deposits representing nearly 92 percent of the bank's total deposits. Within this MMA, 91.5 percent of the bank's deposits are concentrated in the Chicago-Naperville-Joliet MD (Chicago AA). The next largest concentration of deposits in this multistate area is in the Lake County – Kenosha County, IL-WI, MD (Lake AA) with 5.2 percent of deposits (HNA has no offices in Kenosha County, Wisconsin, thus only Lake County Illinois is included in this AA), followed by the Gary, IN MD (Northwest Indiana AA) with 3.3 percent of the deposits. Because it has the largest portion of HNA deposits in this multistate

¹ 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.

area, we selected the Chicago-Naperville-Joliet, MD (aka Chicago AA) for full-scope analysis. The remaining MDs were analyzed using limited-scope procedures.

HNA has 196 office locations within this MMA. Primary competitors include J.P. Morgan Chase Bank, N.A., and Bank of America, N.A.

The volume of small farm loans originated in this MMA was large enough to result in a meaningful analysis. We applied minimal weighting to this loan category, however, and as a result, this category had a neutral impact on lending performance in this MMA.

Refer to the market profile in appendix C for performance context information for the Chicago-Naperville-Joliet, IL-IN-WI MMA.

LENDING TEST

HNA's performance under the Lending Test in the Chicago-Naperville-Joliet, IL-IN-WI MMA is high satisfactory. Based on a full-scope review, the bank's performance in the Chicago AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating for this MMA.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

HNA's lending activity reflects excellent responsiveness to the credit needs of its AA considering its size, resources, and deposit and lending market activity in the Chicago AA. Refer to Table 1 Lending Volume in the Chicago-Naperville-Joliet, IL-IN-WI MMA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

To provide perspective regarding the relative levels of lending volume in each AA, we also compared the bank's deposit market rank and market share to its lending market rank and market share for each loan product. Because of the large number of lenders compared to banks in each AA (refer to Market Profiles in appendix C), we based our analysis on the bank's percentile rankings in the deposit and loan markets rather than the actual values of market rank and market share.

FDIC deposit market share data as of June 30, 2009 show that the bank ranks at the 98.8th percentile for deposit market share in the Chicago AA. HNA's market share percentile ranking based on HMDA data for home purchase loans (98.49), home improvement loans (98.74), and home refinance loans (99.31) substantially met or exceeded its percentile ranking for deposit market share. CRA data show that HNA's small business (97.13 percentile) lending is near its deposit percentile ranking and small farm lending (83.67) is below the bank's deposit percentile ranking.

Distribution of Loans by Income Level of the Geography

HNA's overall geographic distribution is adequate. This conclusion is based on good small loans to farms performance; and adequate home mortgage and small loans to businesses performance. There is a low volume of small loans to farms relative to the other loan types and this had a neutral impact to the Lending Test performance in this MMA.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the MMA 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.

HNA's geographic distribution is excellent for multi-family loans, and adequate for home purchase, home improvement and home refinance loans.

Home Purchase

The geographic distribution of home purchase loans is adequate. The percentage of home purchase loans made in low-income geographies exceeds, and in moderate-income geographies is below, the percentage of owner-occupied units. The market share for home purchase loans made in low-income geographies is somewhat below, in moderate-income geographies meets, the overall market share for home purchase loans.

Home Improvement

The geographic distribution of home improvement loans is adequate. The percentage of home improvement loans made in both low- and moderate-income geographies is below the percentage of owner-occupied units. The market share for home improvement loans made in low- and moderate-income geographies is below the overall market share for home improvement loans.

Home Refinance

The geographic distribution of home refinance loans is adequate. The percentage of home refinance loans made in both low- and moderate-income geographies is below the percentage of owner-occupied units. The market share for home refinance loans made in both low- and moderate-income geographies is below the overall market share for home refinance loans.

Multi-Family

The geographic distribution of multi-family loans is excellent. The percentage of multi-family loans made in low- and moderate-income geographies exceeds the percentage of multi-family units. The market share of multi-family loans made in low-income geographies is near to, and in moderate-income geographies approximates, the overall market share for multi-family loans.

Small Loans to Businesses

HNA's geographic distribution for small loans to businesses in the Chicago AA is adequate. Refer to Tables 6 in the MMA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The percentage of small loans to businesses made in low-income geographies is significantly below, and in moderate-income geographies below, the percentage of businesses within those geographies. The market share for small loans to businesses made in both low- and moderate-income geographies is below the overall market share for small loans to businesses.

Small Loans to Farms

HNA's geographic distribution of small loans to farms in the Chicago AA is good. Refer to Table 7 in the MMA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's small loans to farms.

The geographic distribution of small loans to farms is good. The percentage of small loans to farms made in moderate-income geographies significantly exceeds the percentage of farms within those geographies. The market share for small loans to farms made in moderate-income geographies significantly exceeds the overall market share for small loans to farms. The bank made no small loans to farms in low-income geographies. In relation to other loans made in this AA, there was a low volume of small loans to farms. As a result, this had a neutral impact on the Lending Test performance in this MMA.

Lending Gap Analysis

Reports detailing HNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the Chicago AA.

Distribution of Loans by Income Level of the Borrower

HNA's overall borrower distribution is good. This conclusion is based on good home mortgage and small loans to farms performance, and excellent small loans to businesses performance. The distribution of loans by the income level of the borrower in the Chicago AA is good. There is a low volume of small loans to farms relative to the other loan types and this had a neutral impact to the Lending Test performance in this MMA.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the MMA 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.

HNA's borrower distribution is good for home purchase and home refinance loans, and adequate for home improvement loans, taking into consideration the significant barriers that exist in the Chicago AA. The high poverty rate and high cost of housing are significant barriers to low-income borrowers obtaining mortgage loans in the AA (refer to the Market Profile in appendix C).

Home Purchase

The borrower distribution of home purchase loans is good. The percentage of home purchase loans made to low-income borrowers is substantially below, and to moderate-income borrowers exceeds, the percentage of families defined as such. The market share for home purchase loans made to low-income borrowers exceeds, and to moderate-income borrowers is somewhat below, the overall market share for home purchase loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

Home Improvement

The borrower distribution of home improvement loans is adequate. The percentage of home improvement loans made to low-income borrowers is substantially below, and to moderate-income borrowers is near, the percentage of families defined as such. The market share for home improvement loans made to low-income borrowers exceeds, and to moderate-income borrowers is below, the overall market share for home improvement loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

Home Refinance

The borrower distribution of home refinance loans is good. The percentage of home refinance loans made to low-income borrowers is below, and to moderate-income borrowers is somewhat below, the percentage of families defined as such. The market share for home refinance loans made to both low- and moderate-income borrowers exceeds the overall market share for home refinance loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

Small Loans to Businesses

HNA's distribution of small loans to businesses of different revenue sizes in the Chicago AA is excellent. Refer to Table 11 in the MMA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

The distribution of small loans to businesses of different revenue sizes is excellent. The percentage of small loans made to small businesses significantly exceeds the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less significantly exceeds the overall small business market share.

Small Loans to Farms

HNA's distribution of small loans to farms of different revenue sizes in the Chicago AA is good. Refer to Table 12 in the MMA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's small loans to farms.

The distribution of small loans to farms of different revenue sizes is good. The percentage of small loans made to small farms is somewhat below the percentage of farms defined as such. The market share for small loans made to farms with revenue of \$1 million or less significantly exceeds the overall small farm market share. In relation to other loans made in this AA, there was a low volume of small loans to farms. As a result, this had a neutral impact on the Lending Test performance in this MMA.

Community Development Lending

Community development lending has a positive impact on the conclusions for the Chicago AA. Refer to Table 1 Lending Volume in the MMA section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One capital to each AA based on its pro rata share of deposits as a means of comparative analysis.

HNA has a good level of community development loans in the Chicago AA, given the community development needs and opportunities that exist in the AA. During the evaluation period for community development loans, the bank made 112 community development loans totaling \$172 million. The bank's community development lending represents nearly 6 percent of Tier One capital allocated to the Chicago AA. HNA's community development lending addresses needs for affordable housing, economic development, community services and efforts to stabilize and revitalize the community.

Other Lending Activities

HNA made 149 SBA loans totaling \$61 million in the Chicago AA during the evaluation period. These loans were not reportable with HNA's CRA data. HNA is a preferred SBA lender, meaning they have been delegated authority by the SBA to make credit decisions on SBA loan applications, thereby decreasing the processing time involved in approving these loan requests.

Product Innovation and Flexibility

HNA makes limited use of innovative or flexible lending programs and this had a neutral impact on the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lake AA is not inconsistent with the bank's overall high satisfactory performance under the Lending Test in the Chicago-Naperville-Joliet, IL-IN-WI MMA. The bank's performance in the Northwest Indiana AA is stronger than the bank's overall high satisfactory performance under the Lending Test in the Chicago-Naperville-Joliet, IL-IN-WI multistate metropolitan area due to a significantly higher level of community development lending. Refer to Tables 1 through 13 in the Chicago-Naperville-Joliet, IL-IN-WI MMA 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 the Chicago-Naperville-Joliet, IL-IN-WI MMSA is rated high satisfactory. Based on a full-scope review, performance in the Chicago AA is good. HNA's responsiveness to the identified needs of the AAs is good. Performance in the limited-scope AAs did not negatively impact the Investment Test rating in the Chicago-Naperville-Joliet, IL-IN-WI MMA.

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

In its investing activities, HNA exhibited a good level of responsiveness to credit and community development needs. Opportunities to make qualified investments in the Chicago AA are many, especially in the areas of affordable housing, community services and activities that revitalize or stabilize low- or moderate-income geographies. HNA made qualified investments within its AA through equity equivalent investments, purchases of securities, cash contributions, and grants. These investments total \$130 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period are having in the Chicago AA. The remaining balance on 50 prior period investments as of June 30, 2009 was \$40 million. Combined, this \$170 million in qualified investments represents 5.75 percent of the Tier one capital allocated to this AA. A significant factor taken into consideration in assessing the bank's volume of qualified investments is the strong competitive banking community that exists within HNA's Chicago AA. Within this AA, there are 245 FDIC insured financial institutions competing for qualified CRA investments. (Refer to the Market Profile in appendix C.)

If a bank has adequately addressed the needs of its AAs, the OCC will also consider qualified investment activities that benefit areas outside the bank's AA in the evaluation of its performance. HNA has adequately addressed the needs of its AAs and, therefore, we considered an investment made outside, but adjacent to its Northwest Indiana AA. In the current evaluation period HNA made an equity equivalent investment in a rental property project which provides housing for low- and moderate-income families. The total amount of this investment was \$3.3 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lake AA and the Northwest Indiana AA is stronger than the bank's overall performance in the Chicago-Naperville-Joliet, IL-IN-WI MMA. The stronger performance was due to higher relative volumes of investment activity. Refer to the Table 14 in the Chicago-Naperville-Joliet, IL-IN-WI MMA section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNA's performance under the Service Test in the Chicago-Naperville-Joliet, IL-IN-WI MMA is rated high satisfactory. Based on a full-scope review, the bank's performance in the Chicago AA is good.

Retail Banking Services

Refer to Table 15 in the Chicago MMA 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.

HNA has 176 office locations throughout the Chicago AA. HNA has an adequate distribution of delivery systems that are reasonably accessible to individuals and geographies of different income levels in the Chicago AA.

The percentage of branches in low- and moderate-income geographies is below the percentage of the population within these geographies; however, lending activity showed that HNA served individuals of all income levels.

Services offered at each office location as well as the business hours of each vary only to a minor degree. These differences do not adversely affect low- or moderate-income geographies or individuals. With some exceptions office lobbies open by 8:30 a.m. Monday through Saturday and close by 5:00 p.m. Monday through Friday. On Saturday, offices usually close by 1:00 p.m. There are a limited number of offices which are open on Sundays. The overwhelming majority of offices are full-service locations offering traditional deposit and loan products.

Since the last CRA evaluation, HNA has closed seven offices and opened eighteen offices in the Chicago AA. Within low- and moderate-income geographies, HNA opened six offices and closed one. The one closure related to a lease HNA had with a grocery store, and the grocery store lost its lease which negatively effected HNA's office. HNA's strategy during much of the evaluation period placed an emphasis on opening offices in low- or moderate-income geographies. This improved access to HNA's offices in both low- and moderate-income geographies.

Alternative Delivery Services

The bank offers various alternative systems for delivering retail banking services, including automated teller machines (ATMs), telephone banking, computer banking, direct deposit, bank by mail, night depository, and courier services. Because no data were available concerning the effectiveness of these systems to low- and moderate-income geographies and individuals, we did not place significant weight on these systems in the overall Service Test conclusions.

HNA owns and operates 347 ATMs located within the Chicago AA. 53 ATMs are located in low- or moderate-income geographies. Deposits and withdrawals can be made at 75 percent of these ATMs; however, 22 of the ATMs in low- and moderate-income geographies do not accept deposits. The distribution of ATMs in this AA is below the distribution of low- and moderate-income individuals; however, the ATM distribution is stronger than the distribution of office locations.

There are also 95 HNA branded (not owned by HNA) ATMs located within the Chicago AA. These ATMs are cash dispensing machines only and HNA ATM customers are allowed to access their funds surcharge free through these ATMs.

Community Development Services

HNA's performance in providing community development services in the Chicago AA is excellent. Bank management invests a substantial amount of time and effort in community development programs targeted to low- and moderate-income individuals and geographies within HNA's AA, positively impacting the Service Test rating. These services include providing credit counseling, first-time homebuyer seminars, financial planning, technical expertise to nonprofit or government organizations, and financial education and management skills. All of these are considered to address the credit needs identified in our community contacts for financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lake AA is not inconsistent with the bank's overall performance in the Chicago-Naperville-Joliet, IL-IN-WI MMA. Performance in the Northwest Indiana AA is stronger than the bank's overall performance in the Chicago-Naperville-Joliet, IL-IN-WI MMA because of a better distribution of branch offices in low-income geographies. Refer to the Table 15 in the Chicago-Naperville-Joliet, IL-IN-WI MMA section of appendix D for the facts and data that support these conclusions.

State of Indiana Rating

State of Indiana

CRA Rating for Indiana²:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent level of lending activity;
- Adequate geographic distribution of HMDA loans and small loans to businesses;
- Good borrower distribution of HMDA loans, small loans to businesses and small loans to farms;
- Good investment activity (the limited number of investments in the limited-scope areas negatively impacted the excellent performance demonstrated in the full-scope area); and
- Adequate distribution of offices;
- An adequate level of community development services.

Description of Institution’s Operations in Indiana

HNA has delineated six AAs within the state of Indiana. Three AAs relate to separate MSAs, and three relate to separate non-metropolitan counties. The three non-metropolitan counties were combined for analysis purposes. HNA has also designated portions of the Gary, Indiana MSA as an AA, however, that AA was included in the analysis of the Chicago-Naperville-Joliet, IL-IN-WI multistate metropolitan area and is not included in the analysis of the state of Indiana.

Within the state of Indiana, HNA holds \$945 million of deposits representing nearly 3.6 percent of the bank’s total deposits. Of these deposits, 45 percent are concentrated in the Indianapolis-Carmel, IN MSA (Indianapolis AA). The next largest concentration of deposits in the state of Indiana is in the Kokomo, IN MSA (Kokomo AA) with 30 percent of statewide deposits, followed by the Terre Haute, IN MSA (Terre Haute AA) with 19 percent, and then by the non-metropolitan counties with nearly 6 percent. Because it has the largest portion of HNA

² 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.

deposits in the state, we selected the Indianapolis AA for full-scope analysis. The remaining AAs were analyzed using limited-scope procedures.

HNA has 32 office locations within the state of Indiana. Primary competitors include J.P. Morgan Chase Bank, N.A.; PNC Bank, National Association; Fifth Third Bank; and First Financial Bank.

Refer to the market profiles for the state of Indiana in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

LENDING TEST

HNA's performance under the Lending Test in Indiana is rated high satisfactory. Based on a full-scope review, the bank's performance in the Indianapolis AA is good. Performance in the limited-scope AAs did not negatively impact the Lending Test rating in Indiana.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

HNA's lending activity reflects excellent responsiveness to the credit needs of its AAs. The lending activity in the Indianapolis AA is excellent. Refer to Table 1 Lending Volume in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's lending activity.

To provide perspective regarding the relative levels of lending volume in each AA, we also compared the bank's deposit market rank and market share to its lending market rank and market share for each loan product. Because of the large number of lenders compared to banks in each AA (refer to Market Profiles in appendix C), we based our analysis on the bank's percentile rankings in the deposit and loan markets rather than the actual values of market rank and market share.

HNA's market share percentile ranking for home purchase loans, home improvement loans, home refinance loans, and small loans to businesses meets or exceeds its percentile ranking for deposit market share. For small loans to businesses the bank's market share percentile ranking exceeds the percentile ranking for deposit market share. The percentile ranking for small loans to farms is somewhat below the percentile ranking for deposit market share. FDIC deposit market share data as of June 30, 2009 show that the bank ranks at the 74th percentile for deposit market share in the Indianapolis AA. HNA ranks at the 87th percentile for home purchase and home refinance loans, and 74th percentile for home improvement loans, based on 2008 aggregate HMDA data for the Indianapolis AA. According to 2008 aggregate small business and loan data, the bank ranks at the 78th percentile for small loans to businesses and 65th percentile for small loans to farms.

Distribution of Loans by Income Level of the Geography

HNA's overall geographic distribution of HMDA loans and small loans to businesses is adequate. The geographic distribution of small loans to farms is very poor, but only 21 such loans were made during the evaluation period and this had a neutral impact on HNA's Lending Test performance in the state of Indiana. The geographic distribution of loans in the Indianapolis AA is adequate.

Home Mortgage Loans

HNA's geographic distribution of home mortgage loans in the Indianapolis AA is adequate. Refer to Tables 2, 3, 4, and 5 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

HNA's geographic distribution is adequate for home purchase and home improvement loans, and poor for home refinance loans.

Home Purchase

The geographic distribution of home purchase loans is adequate. The percentage of home purchase loans made in both low- and moderate-income geographies is significantly below the percentage of owner-occupied units. The market share for home purchase loans made to low-income geographies is somewhat below, and to moderate-income geographies meets, the overall market share for home purchase loans.

Home Improvement

The geographic distribution of home improvement loans is adequate. The percentage of home improvement loans made in low- and moderate-income geographies is below the percentage of owner-occupied units. The market share for home improvement loans made to low-income geographies is substantially below, and to moderate-income geographies is somewhat below, the overall market share for home improvement loans.

Home Refinance

The geographic distribution of home refinance loans is poor. The percentage of home refinance loans made in low-income geographies is substantially below, and in moderate-income geographies is below, the percentage of owner occupied units. The market share for home refinance loans made to low-income geographies is substantially below, and in moderate-income geographies is below, the overall market share for home refinance loans.

Multi-family

Because HNA made only three multi-family loans in the AA during the evaluation period a meaningful analysis could not be performed. This had a neutral impact to the Lending Test conclusion in the state of Indiana.

Small Loans to Businesses

HNA's geographic distribution of small loans to businesses in the Indianapolis AA is adequate. Refer to Table 6 in the state of Indiana 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 percentage of small loans to businesses made in low-income geographies is significantly below, and in moderate-income geographies is below, the percentage of businesses within those geographies. The market share for small loans to businesses in low-income geographies is significantly below, and in moderate-income geographies exceeds, the overall market share for small loans to businesses.

Small Loans to Farms

HNA's geographic distribution of small loans to farms in the Indianapolis AA is very poor. During the evaluation period only 21 small loans to farms were made within the Indianapolis AA and none of these were made in low- or moderate-income geographies. This level of lending carried little weight in assessing Lending Test performance in the Indianapolis AA. Refer to Table 7 in the state of Indiana 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 farms.

Lending Gap Analysis

Reports detailing HNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses and farms were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the Indianapolis AA.

Distribution of Loans by Income Level of the Borrower

HNA's overall borrower distribution of HMDA loans, small loans to businesses and small loans to farms is good. The distribution of loans among individuals, businesses and farms of different income levels in the Indianapolis AA is good. It should be noted that only 21 small loans to farms were made within the Indianapolis AA during the evaluation period, and this carried little weight in assessing Lending Test performance in the Indianapolis AA.

Home Mortgage Loans

HNA's distribution of home mortgage loans among individuals of different income levels in the Indianapolis AA is good. Refer to Tables 8, 9 and 10 in the state of Indianapolis 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.

HNA's borrower distribution is excellent for home purchase loans, and good for home improvement and home refinance loans, taking into consideration the barriers that exist in the Indianapolis AA. The poverty rate is a significant barrier to making home mortgage loans to low-income individuals in the AA (see Market Profile in appendix C).

Home Purchase

The borrower distribution of home purchase loans is excellent. The percentage of home purchase loans made to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of families defined as such. The market share for home purchase loans made to low- and moderate-income borrowers exceeds the overall market share for home purchase loans. It should be noted that almost nine percent of the households in the AA lived below the poverty level.

Home Improvement

The borrower distribution of home improvement loans is good. The percentage of home improvement loans made to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of families defined as such. The market share for home improvement loans made to low- and moderate-income borrowers exceeds the overall market share for home improvement loans. It should be noted that almost nine percent of the households in the AA lived below the poverty level.

Home Refinance

The borrower distribution of home refinance loans is good. The percentage of home refinance loans made to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of families defined as such. The market share for home refinance loans made to both low- and moderate-income borrowers exceeds the overall market share for home refinance loans. It should be noted that almost nine percent of the households in the AA lived below the poverty level.

Small Loans to Businesses

HNA's distribution of small loans to businesses of different revenue sizes in the Indianapolis AA is good. Refer to Table 11 in the state of Indiana 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 percentage of small loans made to small businesses is somewhat below the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less significantly exceeds its overall small business market share.

Small Loans to Farms

HNA's distribution of small loans to farms of different revenue sizes in the Indianapolis AA is good. During the evaluation period only 21 small loans to farms were made within the Indianapolis AA, and this level of lending carried little weight in assessing Lending Test performance in this AA. Refer to Table 12 in the state of Indiana 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 percentage of small loans made to small farms is somewhat below the percentage of farms defined as such. The market share for small loans made to farms with revenue of \$1 million or less exceeds its overall small farm market share.

Community Development Lending

HNA made no community development loans within the state of Indiana during the evaluation period. This element had a neutral impact on the Lending Test performance in the state of Indiana.

Other Lending Activities

HNA made 11 SBA loans totaling \$2.1 million in the Indianapolis AA during the evaluation period. These loans were not reportable with HNA's CRA data. HNA is a preferred SBA lender, meaning they have been delegated authority by the SBA to make credit decisions on SBA loan applications, thereby decreasing the processing time involved in approving these loan requests.

Product Innovation and Flexibility

HNA makes limited use of innovative or flexible lending programs and this had a neutral impact on the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Kokomo AA, Terre Haute AA and the non metropolitan areas of Indiana AA is not inconsistent with the bank's overall performance in Indiana. Refer to the Tables 1 through 13 in the state of Indiana 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 state of Indiana is high satisfactory. Based on full-scope reviews, the bank's performance in the Indianapolis AA is excellent. The limited number of investments in the limited-scope areas had a negative impact on the Investment Test rating for the state of Indiana.

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

In its investing activities, HNA exhibited an excellent level of responsiveness to credit and community development needs in the Indianapolis AA. HNA made qualified investments in the Indianapolis AA through equity equivalent investments, purchases of securities, and contributions and grants. These investments total \$3.4 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period are having in the

Indianapolis AA. The remaining balance on two prior period investments as of June 30, 2009 was \$2 million. Combined, this \$5.4 million in qualified investments represents nearly 9 percent of Tier One capital allocated to this AA. HNA also made investments in a regional initiative during the evaluation period which impacts all AAs in the state of Indiana. That regional investment represented an additional \$1.8 million.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Terre Haute AA, the Kokomo AA and the non metropolitan areas of Indiana is weaker than the bank's overall performance in the state of Indiana. This weaker performance was the result of lower investment volumes. Refer to the Table 14 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Indiana is rated low satisfactory. Based on a full-scope review, the bank's performance in the Indianapolis AA is adequate.

Retail Banking Services

Refer to Table 15 in the state of Indiana 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.

HNA has 11 office locations throughout the Indianapolis AA. HNA has an adequate distribution of delivery systems that are reasonably accessible to individuals and geographies of different income levels in the Indianapolis AA.

With nearly six percent of the population living in low-income geographies, HNA has no office locations within those geographies; however, lending activity showed that HNA served individuals of all income levels.

Services offered at each office location as well as the business hours of each vary only to a minor degree. These differences do not adversely affect low- or moderate-income geographies or individuals. With some exceptions office lobbies open by 8:30 a.m. Monday through Saturday and close by 5:00 p.m. Monday through Friday. On Saturday, offices usually close by 1:00 p.m. There are a limited number of offices which are open on Sundays. The overwhelming majority of offices are full-service locations offering traditional deposit and loan products.

HNA did not close any offices in this rating area during the evaluation period. This had a neutral impact on the Service Test performance in the state of Indiana.

Alternative Delivery Systems

The bank offers various alternative systems for delivering retail banking services, including automated teller machines (ATMs), telephone banking, computer banking, direct deposit, bank by mail, night depository, and courier services. Because no data were available concerning the effectiveness of these systems to low- and moderate-income geographies and individuals, we did not place significant weight on these systems in the overall Service Test conclusions.

HNA has 12 ATMs located within the Indianapolis AA. Two of these ATMs are located in moderate-income geographies. Deposits and withdrawals can be made at nine of these ATMs, but only one ATM in the moderate-income geographies accepts deposits. The distribution of ATMs in this AA is below the distribution of low- and moderate-income individuals.

Community Development Services

HNA's performance in providing community development services in the Indianapolis AA is adequate. Bank management invests their time and effort in community development programs targeted to low- and moderate-income individuals and geographies within HNA's AA. These services include providing credit counseling, first-time homebuyer seminars, financial planning, technical expertise to nonprofit or government organizations, and financial education and management skills. All of these are considered to address the credit needs identified in our community contacts for financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Kokomo AA, and the non metropolitan areas of Indiana is stronger than the bank's overall performance in the state of Indiana because of a stronger distribution of branches among low- or moderate-income geographies. Based on a limited-scope review, the bank's performance in the Terre Haute AA is not inconsistent with the bank's overall performance in Indiana. Refer to the Table 15 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

State of Wisconsin Rating

State of Wisconsin

CRA Rating for Wisconsin³:	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:

- Good level of lending activity;
- Poor geographic distribution of HMDA loans;
- Adequate geographic distribution of small loans to businesses;
- Good borrower distribution of HMDA loans, small loans to businesses and small loans to farms;
- Adequate level of investment activity (the lack of investments in the limited-scope areas negatively impacted the excellent performance demonstrated in the full-scope area);
- Adequate distribution of office locations;
- An adequate level of community development services.

Description of Institution's Operations in Wisconsin

HNA has delineated eight AAs within the state of Wisconsin. Four AAs relate to separate MSAs, and four relate to separate non metropolitan counties. The four non metropolitan counties were combined for analysis purposes. The evaluation period in Wisconsin was limited to activities occurring in 2008.

Within the state of Wisconsin, HNA holds over \$1.2 billion of deposits representing 4.65 percent of HNA's total deposits. Of these deposits, 72 percent of the bank's deposits are concentrated in the Milwaukee-Waukesha-West Allis MSA (Milwaukee AA). The next largest concentration of deposits in Wisconsin is in the non metropolitan areas with 16.2 percent of deposits, followed by the Green Bay MSA (Oconto AA) with 5.5 percent of deposits, then the Sheboygan MSA (Sheboygan AA) with 4.4 percent of deposits, and finally the La Crosse MSA

³ 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.

(La Crosse AA) with 1.7 percent of deposits. Because it has the largest portion of HNA deposits in Wisconsin, we selected the Milwaukee AA for a full-scope analysis. The remaining AAs were analyzed using limited-scope procedures.

HNA has 55 office locations within Wisconsin. Primary competitors include M&I Marshall & Ilsley Bank and U.S. Bank, National Association.

Refer to the market profiles for the state of Wisconsin in appendix C for detailed demographics and other performance context information for the Milwaukee-Waukesha-West Allis MSA.

LENDING TEST

HNA's performance under the Lending Test in Wisconsin is rated low satisfactory. Based on a full-scope review, the bank's performance in the Milwaukee AA is adequate. Performance in the limited-scope AAs had some positive impact on the Lending Test rating in Wisconsin.

Lending Activity

HNA's lending activity reflects good responsiveness to the credit needs of its AAs. Refer to Tables 1 Lending Volume in the state of Wisconsin section of appendix D for the facts and data used to evaluate the bank's lending activity.

To provide perspective regarding the relative levels of lending volume in each AA we compared the bank's deposit market rank and market share to its lending market rank and market share for each loan product. Because of the large number of lenders compared to banks in each AA (refer to Market Profiles in appendix C), we based our analysis on the bank's percentile rankings in the deposit and loan markets rather than the actual values of market rank and market share.

HNA's market share percentile ranking for home purchase loans and home refinance loans exceeded its percentile ranking for deposit market share. HNA's market share percentile ranking for home improvement loans and small business loans was somewhat less than its percentile ranking for deposit market share. For small farm lending HNA's market share percentile ranking was below its percentile ranking for deposit market share. FDIC deposit market share data as of June 30, 2009 show that the bank ranks at the 88th percentile for deposit market share in the Milwaukee AA. HNA ranks at the 90.94 percentile for home purchase, 77.34 percentile for home improvement, 95.43 percentile for home refinance loans, based on 2008 aggregate HMDA data for the Milwaukee AA. According to 2008 aggregate small business loan data the bank ranks at the 83.15 percentile for small loans to businesses, and at the 60th percentile for small loans to farms, in the Milwaukee AA.

For limited-scope areas within the state of Wisconsin, the comparison of the bank's deposit market rank and market share to its lending market rank and market share was not inconsistent with the overall conclusion of lending activity.

Distribution of Loans by Income Level of the Geography

HNA's overall distribution of HMDA loans is poor. The overall distribution of small loans to businesses is adequate. The overall distribution of small loans to farms is very poor. The geographic distribution of loans in the Milwaukee AA is poor.

Home Mortgage Loans

HNA's geographic distribution of home mortgage loans in the Milwaukee AA is poor. Refer to Tables 2, 3, 4, and 5 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

HNA's geographic distribution is good for home improvement loans, and poor for home purchase and home refinance loans. The low volume of multi-family loans did not result in a meaningful analysis and this had a neutral impact on the conclusion for the Lending Test in the state of Wisconsin.

Home Purchase

The geographic distribution of home purchase loans is poor. The percentage of home purchase loans made in low-income geographies is significantly below, and in moderate-income geographies is below, the percentage of owner-occupied units. The market share for home purchase loans made to low-income geographies is significantly below, and in moderate-income geographies is below, the overall market share for home purchase loans.

Home Improvement

The geographic distribution of home improvement loans is good. The percentage of home improvement loans made in low-income geographies is substantially below, and in moderate-income geographies is substantially equal to, the percentage of owner-occupied units. The market share for home improvement loans made to low-income geographies is substantially below, and to moderate-income geographies exceeds, the overall market share for home improvement loans. HNA made only 25 home improvement loans in the Milwaukee AA during the evaluation period and this had a very small influence on the Lending Test performance in the state of Wisconsin.

Home Refinance

The geographic distribution of home refinance loans is poor. The percentage of home refinance loans made in both low- and moderate-income geographies is significantly below the percentage of owner-occupied units. The market share for home refinance loans made to both low- and moderate-income geographies is significantly below the overall market share for home refinance loans.

Multi-family

Because HNA made only four multi-family loans in the Milwaukee AA during the evaluation period a meaningful analysis could not be performed. This had a neutral impact to the Lending Test performance in the state of Wisconsin.

Small Loans to Businesses

HNA's geographic distribution of small loans to businesses in the Milwaukee AA is adequate. Refer to Table 6 in the state of Wisconsin 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. The percentage of small loans to businesses made in low-income geographies is below, and in moderate-income geographies is significantly below, the percentage of businesses within those geographies. The market share for small loans to businesses made in low-income geographies significantly exceeds, and in moderate-income geographies is below, the overall market share for small loans to businesses.

Small Loans to Farms

HNA's geographic distribution of small loans to farms in the Milwaukee AA is very poor. Refer to Table 7 in the state of Wisconsin 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 farms.

The percentage of small loans to farms made in low- and moderate-income geographies is substantially below the percentage of farms within those geographies. The market share for small loans to farms made in low- and moderate-income geographies is substantially below the overall market share for small loans to farms. HNA made only 15 small loans to farms in the Milwaukee AA during the evaluation period and this had a very small influence on the Lending Test performance in the state of Wisconsin.

Lending Gap Analysis

Reports detailing HNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses and farms were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the Milwaukee AA.

Distribution of Loans by Income Level of the Borrower

HNA's overall borrower distribution of HMDA loans, small loans to businesses and small loans to farms is good. The distribution of loans among individuals of different income levels in the Milwaukee AA is good.

Home Mortgage Loans

HNA's distribution of home mortgage loans among individuals of different income levels in the Milwaukee AA is good. Refer to Tables 8, 9 and 10 in state of Wisconsin 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.

HNA's borrower distribution is good for home purchase and home refinance loans, and adequate for home improvement loans. The high poverty rate is a significant barrier to making home mortgage loans to low-income individuals in the AA (see Market Profile in appendix C).

Home Purchase

The borrower distribution of home purchase loans is good. The percentage of home purchase loans made to low-income borrowers is below, and to moderate-income significantly exceeds, the percentage of families defined as such. The market share for home purchase loans made to both low- and moderate-income borrowers exceeds the overall market share for home purchase loans. It should be noted that nearly ten percent of the households in the AA lived below the poverty level.

Home Improvement

The borrower distribution of home improvement loans is adequate. The percentage of home improvement loans made to low-income borrowers is significantly below, and to moderate-income borrowers is near, the percentage of families defined as such. The market share for home improvement loans to low-income borrowers is significantly below, and to moderate-income borrowers is below, the overall market share for home improvement loans. It should be noted that nearly ten percent of the households in the AA lived below the poverty level. HNA made only 25 home improvement loans in the Milwaukee AA during the evaluation period and this had a very small influence on the Lending Test performance in the state of Wisconsin.

Home Refinance

The borrower distribution of home refinance loans is good. The percentage of home refinance loans made to low-income borrowers is significantly below, and to moderate-income borrowers is substantially equal to, the percentage of families defined as such. The market share for home refinance loans to both low- and moderate-income borrowers is somewhat below the overall market share for home refinance loans. It should be noted that nearly ten percent of the households in the AA lived below the poverty level.

Small Loans to Businesses

HNA's distribution of small loans to businesses of different revenue sizes in the Milwaukee AA is good. Refer to Table 11 in the state of Wisconsin 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 percentage of small loans made to small businesses is below the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less exceeds its overall small business market share.

Small Loans to Farms

HNA's distribution of small loans to farms of different revenue sizes in the Milwaukee AA is good. Refer to Table 12 in the state of Wisconsin 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 percentage of small loans made to small farms is below the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less exceeds its overall small business market share. HNA made only 15 small loans to farms in the Milwaukee AA during the evaluation period and this had a very small influence on the Lending Test performance in the state of Wisconsin.

Community Development Lending

HNA made no community development loans within the state of Wisconsin during the evaluation period and this had a neutral impact on the Lending Test performance in the state of Wisconsin.

Other Lending Activities

HNA made four SBA loans totaling \$623 thousand in the Milwaukee AA during the evaluation period. These loans were not reportable with HNA's CRA data. HNA is a preferred SBA lender, meaning they have been delegated authority by the SBA to make credit decisions on SBA loan applications, thereby decreasing the processing time involved in approving these loan requests.

HNA's affiliated Lincoln Neighborhood Redevelopment Co. made 7 small business loans which were not included in HNA's CRA data. These loans totaled \$689 thousand.

Product Innovation and Flexibility

HNA makes limited use of innovative or flexible lending programs and this had a neutral impact on the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the La Crosse AA and the Sheboygan AA is not inconsistent with the bank's overall performance in the state of Wisconsin. The bank's performance in the Oconto AA and the non metropolitan area AA is stronger than the overall performance in the state of Wisconsin. Performance in the Oconto AA and the non metropolitan areas of Wisconsin was stronger due to stronger performance in the geographic distribution of home purchase and home refinance lending and borrower distribution of home improvement lending, and small business and farm lending. Refer to Tables 1 through 13 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNA's performance under the Investment Test in the state of Wisconsin is low satisfactory. Based on full-scope reviews, the bank's performance in the Milwaukee AA is excellent. Weaker performance in the limited-scope areas had a negative impact on the Investment Test performance in the state of Wisconsin.

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

In its investing activities, HNA exhibited an excellent level of responsiveness to credit and community development needs in the Milwaukee AA. HNA made qualified investments in the Milwaukee AA through equity equivalent investments and through community service contributions and grants. These investments total \$10.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period are having in the Milwaukee AA. The remaining balance on one prior period investment as of June 30, 2009 was \$9 thousand. Combined, these qualified investments represent 8.47% of Tier One capital allocated to this AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in all other AAs in Wisconsin was much weaker than the bank's overall performance in the state of Wisconsin as no investments activity in those areas took place. Refer to the Table 14 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Wisconsin is rated low satisfactory. Based on a full-scope review, the bank's performance in the Milwaukee AA is adequate.

Retail Banking Services

Refer to Table 15 in the state of Wisconsin 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.

HNA has 38 office locations throughout the Milwaukee AA. HNA has an adequate distribution of delivery systems that are reasonably accessible to individuals and geographies of different income levels in the Milwaukee AA.

The distribution of offices in low-income geographies is significantly below, and in moderate-income geographies is somewhat below, the percentage of the population living in those

geographies; however, lending activity showed that HNA served individuals of all income levels.

Services offered at each office location as well as the business hours of each vary only to a minor degree. These differences do not adversely affect low- or moderate-income geographies or individuals. With some exceptions office lobbies open by 8:30 a.m. Monday through Saturday and close by 5:00 p.m. Monday through Friday. On Saturday, offices usually close by 1:00 p.m. There are a limited number of offices which are open on Sundays. The overwhelming majority of offices are full-service locations offering traditional deposit and loan products.

HNA's record of opening and closing offices had a neutral impact on the Service Test performance in the state of Wisconsin. One office in a middle-income geography was closed during the evaluation period.

Alternative Delivery Systems

The bank offers various alternative systems for delivering retail banking services, including automated teller machines (ATMs), telephone banking, computer banking, direct deposit, bank by mail, night depository, and courier services. Because no data were available concerning the effectiveness of these systems to low- and moderate-income geographies and individuals, we did not place significant weight on these systems in the overall Service Test conclusions.

HNA has 26 ATMs located within the Milwaukee AA. Three ATMs are located in low- or moderate-income geographies. Only five ATMs allow for deposits and withdrawal of funds, none of which are located in low- or moderate-income geographies. The distribution of ATMs in this AA is significantly below the distribution of low- and moderate-income individuals.

Community Development Services

HNA's performance in providing community development services in the Milwaukee AA is adequate. Bank management invests their time and effort in community development programs targeted to low- and moderate-income individuals and geographies within HNA's AA. These services include providing credit counseling, first-time homebuyer seminars, financial planning, technical expertise to nonprofit or government organizations, and financial education and management skills. All of these are considered to address the credit needs identified in our community contacts for financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the La Crosse AA and the Oconto AA is stronger than the bank's overall performance in Wisconsin. This stronger performance is due to a better branch distribution in moderate-income geographies. Based on limited-scope reviews, the bank's performance in the Sheboygan AA and the non metropolitan areas of Wisconsin is weaker than the bank's overall performance in Wisconsin. This weaker performance is due to the fact that the bank has no branches in moderate-income geographies. Refer to Table 15 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Chicago-Naperville-Joliet, IL-IN-WI rating area: Lending Test (excludes CD loans): 1/1/06 to 12/31/08 Investment and Service Tests and CD Loans: 7/1/06 to 6/30/09 State of Indiana rating area: Lending Test (excludes CD loans): 1/1/07 to 12/31/08 Investment, CD Loans and CD services: 1/4/07 to 6/30/09 State of Wisconsin rating area: Lending Test (excludes CD loans): 1/1/08 to 12/31/08 Investments, CD Loans and CD services: 2/29/08 to 6/30/09	
Financial Institution	Products Reviewed	
Harris National Association (HNA) City, State)	HMDA reported loans, CRA loans, Community development loans, SBA loans, qualified investments.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Lincoln Neighborhood Redevelopment Corporation	Subsidiary	Small business loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Chicago-Naperville-Joliet Multistate MA Chicago-Naperville-Joliet MD #16974 Lake County, IL MD #29404 Gary, IN MD #23844 State of Indiana Indianapolis MSA #26900 Kokomo MSA #29020 Terre Haute MSA #45460 IN Nonmetropolitan Areas State of Wisconsin Milwaukee MSA #33340 La Crosse MSA #29100 Green Bay MSA #24580 Sheboygan MSA #43100 WI Nonmetropolitan Areas	Full-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope	Excludes DeKalb county Lake county only Lake and Porter counties only Include only Hamilton, Hendricks, Marion and Morgan counties. Exclude Vermillion county Includes Cass, Grant & Wayne counties Includes only Oconto county Includes Crawford, Sauk, Shawano & Vernon counties.

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		Harris National Association		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Harris National Association	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Chicago-Naperville-Joliet Multistate MA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Indiana	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Wisconsin	Low Satisfactory	Low Satisfactory	Low Satisfactory	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

Chicago-Naperville-Joliet MMSA Full-Scope Area

Chicago-Naperville-Joliet MD (16974)

Demographic Information for Full-Scope Area: Chicago-Naperville-Joliet MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,703	13.68	25.07	35.11	25.13	1.00
Population by Geography	7,539,443	7.94	23.59	39.03	29.43	.01
Owner-Occupied Housing by Geography	1,733,076	2.61	15.19	44.72	37.48	-
Businesses by Geography	543,185	3.87	14.46	37.44	43.94	.30
Farms by Geography	8,007	1.42	8.69	48.40	41.49	-
Family Distribution by Income Level	1,843,681	7.01	21.5	40.36	31.13	-
Distribution of Low- and Moderate-Income Families throughout AA Geographies	709,184	14.44	33.72	37.71	14.13	-
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level		=\$60,166 =\$71,100 = 9.98%	Median Housing Value Unemployment Rate			= \$174,984 = 11.3%

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

Source: 2000 U.S. Census, and 2008 HUD updated MFI.

The Chicago AA comprises seven of the eight counties in the Chicago-Naperville-Joliet MD. The counties are Cook, DuPage, Grundy, Kane, Kendall, McHenry and Will counties. DeKalb County is not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies. Chicago-Naperville-Joliet MD is part of the Chicago-Naperville-Joliet multistate MSA.

As of June 30, 2009, HNA had \$22.4 billion in deposits (market share of 8.92 percent) and ranked as the 3rd largest deposit taking financial institution of the 245 financial institutions in the AA. HNA has 176 banking offices in this AA and 330 ATMs. Primary competitors are JP Morgan Chase, N.A. and Bank of America N.A. with deposit market shares of 16.35 percent and 12.91 percent, respectively.

The City of Chicago dominates the AA. The AA shares the same challenges as other urban areas, including high housing costs with more than 359,000 households paying more than 30 percent of their income in rent. Housing stock is old with much of the housing stock being more than fifty years of age.

The AA continues to be a business and distribution center for the Midwest and a popular convention venue. Business, financial and professional services, transportation and distribution services, and tourism are the main drivers of the economy. This is evidenced in the top five employment sectors in the area: professional and business services, education and health services, government, manufacturing, and retail trade. While the AA economy continues to improve, high exposure to the manufacturing and distribution industries, an aging infrastructure, and competition with other cities for tourism and convention dollars may restrain growth.

The unemployment rate has risen in the AA from 4.3 percent in June 2006, to 11.3 percent as of June 2009 which exceeds the unemployment rates for the State of Illinois and the national rates of 10.3 percent and 9.5 percent, respectively.

Through nine contacts with community groups, we identified the following financial needs:

- Affordable mortgage products
- Affordable small business loans
- Financial planning workshops
- Financial literacy classes

State of Indiana Full-Scope Area

Indianapolis-Carmel MSA (26900)

Demographic Information for Full Scope Area: Indianapolis-Carmel MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	257	10.12	31.52	38.13	19.84	0.39
Population by Geography	1,213,976	5.82	26.48	41.79	25.92	0.00
Owner-Occupied Housing by Geography	365,980	3.11	19.49	47.47	29.94	0.00
Business by Geography	117,170	4.03	18.13	47.10	30.63	0.11
Farms by Geography	3,213	1.40	11.86	63.06	23.69	0.00
Family Distribution by Income Level	365,410	19.52	18.71	22.99	38.79	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	139,663	8.84	36.60	42.76	11.79	0.00
Median Family Income		55,425	Median Housing Value		\$111,852	
HUD Adjusted Median Family Income for 2008		65,100	Unemployment Rate (2000 US Census)		8.7%	
Households Below Poverty Level		8.9%				

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

Source: 2000 US Census and 2008 HUD updated MFI.

The Indianapolis AA includes four of the ten counties in the Indianapolis-Carmel MSA. The AA includes Hamilton, Hendricks, Marion and Morgan counties. Boone, Brown, Hancock Johnson, Putnam and Shelby counties are not included. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2009, HNA had \$426 million in deposits (market share 1.79 percent) and ranked as the 11th largest deposit taking financial institution of the 43 financial institutions in the AA. HNA has 11 banking offices in the AA. Major competitors include J.P. Morgan Chase, N.A who is lead deposit taker and Fifth Third Bank with deposit market shares of 27.89 percent and 16.87 percent, respectively.

The largest city in the AA is Indianapolis. The AA has a diversified industrial structure, a strong distribution system, and low cost of doing business and cost of living. Major industries in the AA are administrative and support services, food services, professional, scientific, and technical services, ambulatory health care services, and specialty trade contractors.

The unemployment rate has risen in the AA from 3.9 percent at December 31, 2006 to 8.7 percent in June 2009. The State of Indiana's unemployment rate is higher at 10.7 percent and the national unemployment rate is also higher at 9.5 percent.

Through five community contacts made during the evaluation period we identified the following financial needs:

- Affordable mortgage products
- Affordable small business loans
- Financial literacy classes

State of Wisconsin Full-Scope Area

Milwaukee-Waukesha-West Allis MSA

Demographic Information for Full Scope Area: Milwaukee-Waukesha-West Allis, WI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	416	18.99	19.95	37.98	22.36	0.72
Population by Geography	1,500,741	11.87	16.37	42.27	29.29	0.19
Owner-Occupied Housing by Geography	359,082	4.46	12.07	46.58	36.88	0.00
Business by Geography	100,403	8.36	13.53	42.55	34.98	0.58
Farms by Geography	1,945	2.42	5.09	48.38	43.96	0.15
Family Distribution by Income Level	383,799	19.84	17.89	23.61	38.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	144,827	20.54	24.36	40.13	14.97	0.00
Median Family Income		56,640	Median Housing Value		125,318	
HUD Adjusted Median Family Income for 2008		67,700	Unemployment Rate (2000 US Census)		9.8%	
Households Below Poverty Level		9.56%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI.

The Milwaukee AA includes all four counties in the Milwaukee-Waukesha-West Allis, WI MSA. These are Milwaukee, Ozaukee, Washington and Waukesha counties. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

As of June 30, 2009, HNA had \$894 million in deposits (market share 1.81 percent) and ranked as the seventh largest deposit taking financial institution of the 58 financial institutions in the AA. HNA has 38 banking offices in the AA. Major competitors include M&I Marshall & Ilsley Bank with a market share of 28.04 percent and U.S. Bank, National Association with a deposit market share of 25.20 percent.

The largest city in the AA is Milwaukee. The AA has a diversified industrial structure, a strong distribution system, and low cost of doing business and cost of living. Major industries in the AA are administrative and support services, food services, professional, scientific, and technical services, ambulatory health care services, and specialty trade contractors.

The unemployment rate has risen in the AA from 4.2 percent at December 31, 2007 to 9.8 percent in June 2009. The State of Wisconsin's unemployment rate is lower at 9 percent and the national unemployment rate is also lower at 9.5 percent.

Through five community contacts made during the evaluation period we identified the following financial needs:

- Affordable mortgage products;
- Small loans to businesses; and
- Financial planning workshops

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of 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/assessment area; (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 % 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 30th 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/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area 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/assessment area. 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 Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family 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 assessment area.
- 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 assessment area.
- 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/assessment area. 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/assessment area.

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 assessment area. 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

Chicago-Naperville-Joliet, IL-IN-WI Multistate Metropolitan Area(s)	D-5
State of Indiana	D-19
State of Wisconsin	D-33

Table 1. Lending Volume

LENDING VOLUME		Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI, MMA						Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	% 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)	
Full Review:												
Chicago AA	86.08	25,500	4,065,436	21,392	2,024,845	124	16,527	112	171,840	47,128	6,278,648	91.49
Limited Review:												
Lake AA	8.95	2,461	643,240	2,433	227,774	0	0	5	7,965	4,899	878,979	5.22
Northwest IN AA	4.97	1,354	172,869	1,350	175,650	1	350	18	39,562	2,723	388,431	3.29

* Loan Data as of 2006, 2007 and 2008. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is July 1, 2006 to June 30, 2009.

*** Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA						Evaluation Period: January 1, 2006 TO December 31, 2008							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	6,166	83.43	2.61	3.67	15.19	11.11	44.72	38.21	37.48	47.02	1.53	1.33	1.53	1.46	1.62
Limited Review:															
Lake AA	757	10.24	1.19	0.00	16.35	13.47	36.62	36.20	45.84	50.33	1.87	0.00	1.30	1.33	2.73
Northwest IN AA	468	6.33	2.03	0.43	18.70	7.48	45.55	38.68	33.71	53.42	1.16	0.00	0.90	0.98	1.43

* Based on 2008 Peer Mortgage Data: Eastern (Northwest IN AA) and Western (Chicago AA and Lake AA) Region.

** 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 housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA															
Evaluation Period: January 1, 2006 TO December 31, 2008															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	2,983	89.61	2.61	1.58	15.19	10.69	44.72	47.80	37.48	39.93	3.97	2.34	2.37	4.38	4.76
Limited Review:															
Lake AA	174	5.23	1.19	0.00	16.35	16.67	36.62	32.18	45.84	51.15	1.27	0.00	2.00	1.11	1.15
Northwest IN AA	172	5.17	2.03	4.07	18.70	16.28	45.55	40.12	33.71	39.53	2.26	0.00	1.41	2.31	2.71

* Based on 2008 Peer Mortgage Data: Eastern (Northwest IN AA) and Western (Chicago AA and Lake AA) Region.

** 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 housing units in a particular geography divided by number of owner-occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA															
Evaluation Period: January 1, 2006 TO December 31, 2008															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	16,064	87.83	2.61	1.53	15.19	9.57	44.72	43.35	37.48	45.55	2.30	1.43	1.52	2.39	2.54
Limited Review:															
Lake AA	1,520	8.31	1.19	0.20	16.35	12.30	36.62	34.47	45.84	53.03	2.34	1.35	1.16	1.73	3.07
Northwest IN AA	705	3.85	2.03	1.42	18.70	17.02	45.55	39.57	33.71	41.99	1.77	1.18	2.35	1.53	1.90

* Based on 2008 Peer Mortgage Data: Eastern (Northwest IN AA) and Western (Chicago AA and Lake AA) Region.

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

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

Table 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA										Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Chicago AA	271	93.45	11.63	15.87	24.24	36.16	35.64	31.73	28.49	16.24	3.25	3.09	3.24	2.96	4.01	
Limited Review:																
Lake AA	10	3.45	6.09	0.00	34.70	30.00	36.12	50.00	23.10	20.00	1.61	0.00	1.43	0.00	6.67	
Northwest IN AA	9	3.10	10.89	11.11	24.79	0.00	48.92	55.56	15.40	33.33	3.61	33.33	0.00	2.27	7.14	

* Based on 2008 Peer Mortgage Data: Eastern (Northwest IN AA) and Western (Chicago AA and Lake AA) Region.

** 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 housing units in a particular geography divided by number of multi-family housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA					
												Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total*	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:																	
Chicago AA	21,373	84.96	3.98	1.33	14.74	7.64	37.39	35.77	43.59	55.26	2.73	1.71	1.90	2.65	3.16		
Limited Review:																	
Lake AA	2,433	9.67	1.01	0.21	14.97	9.66	31.75	27.41	52.28	62.72	2.94	1.50	3.29	2.44	3.30		
Northwest IN AA	1,350	5.37	4.64	3.41	16.40	13.19	44.19	40.44	34.77	42.96	2.39	4.81	3.22	2.30	2.34		

* Based on 2008 Peer Small Business Data: US.

** 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 2008.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA															
Evaluation Period: January 1, 2006 TO December 31, 2008															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago AA	124	99.20	1.34	0.00	8.50	13.71	48.27	52.42	41.89	33.87	2.11	0.00	4.08	1.83	2.37
Limited Review:															
Lake AA	0	0.00	1.37	0.00	18.05	0.00	41.20	0.00	39.38	0.00	0.00	0.00	0.00	0.00	0.00
Northwest IN AA	1	0.80	1.06	0.00	6.01	0.00	49.29	0.00	43.63	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Small Business Data: US.

** 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 2008.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA										Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total**	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Chicago AA	6,171	83.44	20.89	6.71	17.58	19.02	22.03	23.15	39.51	51.12	1.72	1.92	1.57	1.21	2.08	
Limited Review:																
Lake AA	757	10.24	17.00	11.72	17.25	20.69	22.01	17.08	43.75	50.51	2.12	1.04	1.81	1.63	2.93	
Northwest IN AA	468	6.33	20.22	6.28	17.66	20.18	22.92	27.13	39.19	46.41	1.30	1.22	1.21	1.00	1.63	

* Based on 2008 Peer Mortgage Data: Eastern (Northwest IN AA) and Western (Chicago AA and Lake AA) Region.

** 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 8.5% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA										Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]					
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Over all	Low	Mod	Mid
Full Review:																
Chicago AA	2,986	89.62	20.89	7.63	17.58	17.33	22.03	31.04	39.51	43.99	4.29	4.57	3.51	4.63	4.39	
Limited Review:																
Lake AA	174	5.22	17.00	3.55	17.25	23.08	22.01	25.44	43.75	47.93	1.38	1.03	2.76	1.55	0.69	
Northwest IN AA	172	5.16	20.22	8.82	17.66	22.94	22.92	29.41	39.19	38.82	2.37	2.10	3.01	3.49	1.40	

* Based on 2008 Peer Mortgage Data: Eastern (Northwest IN AA) and Western (Chicago AA and Lake AA) Region.

** 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 2.9% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA				
												Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total**	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Chicago AA	16,072	87.84	20.89	6.70	17.58	16.45	22.03	26.64	39.51	50.22	2.71	2.94	2.82	2.35	2.85	
Limited Review:																
Lake AA	1,520	8.31	17.00	7.54	17.25	17.25	22.01	22.25	43.75	52.96	2.70	1.48	2.34	1.79	3.55	
Northwest IN AA	705	3.85	20.22	10.60	17.66	20.90	22.92	26.72	39.19	41.79	2.01	3.06	1.88	1.91	1.98	

* Based on 2008 Peer Mortgage Data: Eastern (Northwest IN AA) and Western (Chicago AA and Lake AA) Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage 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 5.1% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA				
Evaluation Period: January 1, 2006 TO December 31, 2008									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% 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
Full Review:									
Chicago AA	21,392	84.97	66.93	69.14	77.02	11.40	11.58	2.73	7.55
Limited Review:									
Lake AA	2,433	9.66	68.46	74.35	78.91	8.92	12.17	2.94	8.16
Northwest IN AA	1,350	5.36	63.82	58.07	68.74	16.22	15.04	2.39	5.07

* Based on 2008 Peer Small Business Data: US.

** 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 – 2008).

**** 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 7.5% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA									
Evaluation Period: January 1, 2006 TO December 31, 2008									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% 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
Full Review:									
Chicago AA	124	99.20	94.83	79.03	50.81	37.90	11.29	2.11	2.79
Limited Review:									
Lake AA	0	0.00	92.71	0.00	0.00	0.00	0.00	0.00	0.00
Northwest IN AA	1	0.80	97.05	100.00	0.00	0.00	100.00	0.00	0.00

* Based on 2008 Peer Small Business Data: US.

** 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 - 2008).

**** 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 14.1% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA							
		Evaluation Period: January 1, 2006 TO December 31, 2008							
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago AA	50	40,186	508	130,022	558	170,208	85.68	0	0
Limited Review:									
Lake AA	10	1,488	48	12,640	58	14,128	7.11	0	0
Northwest IN AA	7	4,670	70	4,662	77	9,332	4.70	0	0
Regional Area	0	0	1	5,000	1	5,000	2.52	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: CHICAGO-NAPERVILLE-JOLIET, IL-IN-WI MMA									
Evaluation Period: January 1, 2006 TO December 31, 2008																	
MA/Assessment Area:	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
Full Review:																	
Chicago AA	91.49	176	81.86	3.41	9.66	39.20	47.73	18	7	1	4	3	3	7.94	23.59	39.03	29.43
Limited Review:																	
Lake AA	5.22	18	8.37	0.00	22.22	16.67	61.11	1	2	0	0	0	-1	2.76	24.34	33.68	39.23
Northwest IN AA	3.29	21	9.77	9.52	9.52	38.10	42.86	0	1	0	0	-1	0	4.37	23.15	43.90	28.58

Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANA						Evaluation Period: January 1, 2007 TO December 31, 2008				
MA/Assessment Area:	% 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)	
Full Review:												
Indianapolis AA	42.55	355	54,693	355	54,035	21	2,694	0	0	731	111,422	45.05
Limited Review:												
Kokomo AA	35.74	199	15,197	241	21,895	174	25,151	0	0	614	62,243	30.04
Terre Haute AA	18.10	180	11,464	60	4,239	71	7,542	0	0	311	23,245	19.17
Non metropolitan Areas	3.61	49	2,764	11	2,188	2	263	0	0	62	5,215	5.74

* Loan Data as of 2008. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is January 4, 2007 to June 30, 2009.

*** Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	154	52.74	3.64	1.30	21.33	9.74	44.46	43.51	30.57	45.45	0.29	0.24	0.29	0.28	0.30
Limited Review:															
Kokomo AA	40	13.70	0.00	0.00	22.01	17.50	56.36	62.50	21.63	20.00	0.94	0.00	0.76	0.70	1.64
Terre Haute AA	91	31.16	0.00	0.00	15.35	23.08	59.85	53.85	24.80	23.08	1.22	0.00	2.42	1.36	0.53
Non metropolitan Areas	7	2.40	1.13	14.29	16.37	14.29	68.35	42.86	14.15	28.57	0.30	4.00	0.44	0.17	0.41

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	49	44.55	3.64	2.04	21.33	14.29	44.46	51.02	30.57	32.65	0.59	0.00	0.54	0.81	0.35
Limited Review:															
Kokomo AA	32	29.09	0.00	0.00	22.01	31.25	56.36	46.88	21.63	21.88	7.19	0.00	13.89	8.33	0.00
Terre Haute AA	19	17.27	0.00	0.00	15.35	5.26	59.85	78.95	24.80	15.79	0.49	0.00	0.00	0.75	0.00
Non metropolitan Areas	10	9.09	1.13	0.00	16.37	0.00	68.35	70.00	14.15	30.00	0.72	0.00	0.00	0.99	0.00

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 housing units in a particular geography divided by number of owner-occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	149	39.52	3.64	0.00	21.33	12.75	44.46	59.06	30.57	28.19	0.28	0.00	0.21	0.37	0.22
Limited Review:															
Kokomo AA	126	33.42	0.00	0.00	22.01	17.46	56.36	50.79	21.63	31.75	2.69	0.00	1.67	2.87	3.02
Terre Haute AA	70	18.57	0.00	0.00	15.35	5.71	59.85	75.71	24.80	18.57	1.50	0.00	0.47	1.83	1.26
Non metropolitan Areas	32	8.49	1.13	0.00	16.37	12.50	68.35	56.25	14.15	31.25	0.55	0.00	1.21	0.32	0.98

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

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

Table 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008					
MA/Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	3	75.00	7.40	66.67	34.14	0.00	44.21	33.33	14.25	0.00	2.00	7.14	0.00	1.96	0.00
Limited Review:															
Kokomo AA	1	25.00	0.00	0.00	38.90	0.00	53.50	100.00	7.60	0.00	20.00	0.00	0.00	33.33	0.00
Terre Haute AA	0	0.00	0.00	0.00	37.18	0.00	36.77	0.00	26.05	0.00	0.00	0.00	0.00	0.00	0.00
Non metropolitan Areas	0	0.00	8.39	0.00	17.11	0.00	53.30	0.00	21.20	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 housing units in a particular geography divided by number of multi-family housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	355	53.22	4.59	1.13	19.62	14.08	44.66	38.59	31.01	46.20	0.56	0.11	0.61	0.51	0.66
Limited Review:															
Kokomo AA	241	36.13	0.00	0.00	32.13	26.56	52.58	54.77	15.29	18.67	7.44	0.00	8.98	7.90	5.47
Terre Haute AA	60	9.00	0.00	0.00	19.15	10.00	58.69	76.67	21.14	13.33	0.98	0.00	0.19	1.47	0.56
Non metropolitan Areas	11	1.65	5.98	0.00	17.60	18.18	62.07	54.55	14.36	27.27	0.17	0.00	0.33	0.15	0.19

* Based on 2008 Peer Small Business Data: US.

** 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 2008.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: INDIANA						Evaluation Period: January 1, 2007 TO December 31, 2008							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	21	7.84	2.09	0.00	12.52	0.00	55.24	95.24	30.15	4.76	3.57	0.00	0.00	5.83	0.00
Limited Review:															
Kokomo AA	174	64.93	0.00	0.00	3.90	0.00	61.19	72.41	34.91	27.59	56.13	0.00	0.00	68.54	42.62
Terre Haute AA	71	26.49	0.00	0.00	4.04	0.00	71.93	94.37	24.04	5.63	11.39	0.00	0.00	13.44	3.23
Non metropolitan Areas	2	0.75	0.24	0.00	4.00	0.00	82.02	100.00	13.75	0.00	0.45	0.00	0.00	0.49	0.00

* Based on 2008 Peer Small Business Data: US.

** 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 2008.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	154	52.74	20.05	14.38	18.64	29.41	22.61	15.03	38.70	41.18	0.35	0.43	0.51	0.16	0.32
Limited Review:															
Kokomo AA	40	13.70	18.98	13.51	18.80	27.03	23.57	21.62	38.64	37.84	1.09	1.66	0.00	1.12	1.85
Terre Haute AA	91	31.16	19.42	16.48	18.49	30.77	23.23	32.97	38.87	19.78	1.45	3.87	2.18	2.13	0.15
Non metropolitan Areas	7	2.40	18.33	0.00	20.98	14.29	23.67	28.57	37.02	57.14	0.35	0.00	0.23	0.55	0.49

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 1.4% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	49	44.55	20.05	10.20	18.64	24.49	22.61	20.41	38.70	44.90	0.62	0.85	0.87	0.50	0.44
Limited Review:															
Kokomo AA	32	29.09	18.98	29.03	18.80	19.35	23.57	12.90	38.64	38.71	6.83	23.53	6.45	0.00	6.49
Terre Haute AA	19	17.27	19.42	10.53	18.49	36.84	23.23	21.05	38.87	31.58	0.52	0.00	0.00	1.87	0.00
Non metropolitan Areas	10	9.09	18.33	10.00	20.98	20.00	23.67	40.00	37.02	30.00	0.75	0.00	1.52	0.00	1.02

* Based on 2008 Peer Mortgage Data: Eastern Region.

** 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 0.9% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: INDIANA								Evaluation Period: January 1, 2007 TO December 31, 2008					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	149	39.52	20.05	7.59	18.64	26.90	22.61	28.28	38.70	37.24	0.33	0.47	0.29	0.30	0.34
Limited Review:															
Kokomo AA	126	33.42	18.98	12.71	18.80	20.34	23.57	22.03	38.64	44.92	2.84	3.09	3.05	1.22	3.86
Terre Haute AA	70	18.57	19.42	11.43	18.49	20.00	23.23	27.14	38.87	41.43	1.80	2.40	1.64	1.64	1.83
Non metropolitan Areas	32	8.49	18.33	9.38	20.98	15.63	23.67	21.88	37.02	53.13	0.64	0.58	0.54	0.84	0.54

* Based on 2008 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage 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 3.2% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: INDIANA		Evaluation Period: January 1, 2007 TO December 31, 2008			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% 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
Full Review:									
Indianapolis AA	355	53.22	63.15	54.65	65.63	14.08	20.28	0.56	1.17
Limited Review:									
Kokomo AA	241	36.13	63.26	63.49	74.27	14.11	11.62	7.44	14.51
Terre Haute AA	60	9.00	62.05	56.67	88.33	5.00	6.67	0.98	1.99
Non metropolitan Areas	11	1.65	63.85	63.64	81.82	0.00	18.18	0.17	0.32

* Based on 2008 Peer Small Business Data: US.

** 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 – 2008).

**** 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 15.14% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: INDIANA			Evaluation Period: January 1, 2007 TO December 31, 2008				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% 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
Full Review:									
Indianapolis AA	21	7.84	96.94	85.71	47.62	42.86	9.52	3.57	5.83
Limited Review:									
Kokomo AA	174	64.93	98.97	75.29	52.87	29.89	17.24	56.13	57.26
Terre Haute AA	71	26.49	98.42	78.87	69.01	23.94	7.04	11.39	12.45
Non metropolitan Areas	2	0.75	99.18	50.00	50.00	50.00	0.00	0.45	0.65

* Based on 2008 Peer Small Business Data: US.

** 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 – 2008).

**** 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 17.91% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: INDIANA				Evaluation Period: January 1, 2007 TO December 31, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Indianapolis AA	2	2,073	6	3,397	8	5,470	63.18	0	0
Limited Review:									
Kokomo AA	0	0	1	0	1	0	0.00	0	0
Terre Haute AA	1	1,200	0	0	1	1,200	13.86	0	0
Non metropolitan Areas	1	205	0	0	1	205	2.37	0	0
Regional Area	1	1,783	0	0	1	1,783	20.59	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: INDIANA Evaluation Period: January 1, 2007 TO December 31, 2008							
MA/Assessment Area:	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
Full Review:																	
Indianapolis AA	45.05	11	34.38	0.00	18.18	36.36	45.45	0	0	0	0	0	0	5.82	26.48	41.79	25.92
Limited Review:																	
Kokomo AA	30.04	8	25.00	0.00	62.50	37.50	0.00	0	0	0	0	0	0	0.00	26.19	54.03	19.78
Terre Haute AA	19.17	9	28.13	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	19.96	54.85	23.24
Non metropolitan Areas	5.74	4	12.50	50.0	0.00	25.00	25.00	0	0	0	0	0	0	2.44	18.44	66.63	12.50

Table 1. Lending Volume

LENDING VOLUME		Geography: WISCONSIN						Evaluation Period: January 1, 2008 TO December 31, 2008				
MA/Assessment Area:	% 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)	
Full Review:												
Milwaukee AA	46.77	587	102,945	470	84,788	15	1,157	0	0	1,072	188,890	72.21
Limited Review:												
La Crosse AA	5.15	44	6,416	58	7,433	16	897	0	0	118	14,746	1.71
Oconto AA	6.68	49	4,698	69	3,645	35	2,208	0	0	153	10,551	5.51
Sheboygan AA	5.67	44	4,394	71	4,440	15	1,777	0	0	130	10,611	4.39
Non metropolitan Areas	35.73	156	17,144	311	30,132	352	25,279	0	0	819	72,555	16.18

* Loan Data as of 2008. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is February 29, 2008 to June 30, 2009.

*** Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: WISCONSIN						Evaluation Period: January 1, 2008 TO December 31, 2008						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	142	75.94	4.46	0.70	12.07	7.04	46.58	59.15	36.88	33.10	0.72	0.12	0.47	0.89	0.65
Limited Review:															
La Crosse AA	7	3.74	0.00	0.00	11.09	0.00	75.06	85.71	13.85	14.29	0.54	0.00	0.00	0.61	0.65
Oconto AA	3	1.60	0.00	0.00	33.97	33.33	66.03	66.67	0.00	0.00	0.69	0.00	0.64	0.72	0.00
Sheboygan AA	9	4.81	0.00	0.00	10.78	0.00	75.94	88.89	13.28	11.11	0.57	0.00	0.00	0.72	0.34
Non metropolitan Areas	26	13.90	0.00	0.00	10.55	7.69	89.45	92.31	0.00	0.00	1.92	0.00	3.57	1.85	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

** 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 housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: WISCONSIN								Evaluation Period: January 1, 2008 TO December 31, 2008					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	25	67.57	4.46	0.00	12.07	12.00	46.58	28.00	36.88	60.00	0.67	0.00	0.69	0.38	1.21
Limited Review:															
La Crosse AA	3	8.11	0.00	0.00	11.09	0.00	75.06	100.00	13.85	0.00	0.72	0.00	0.00	0.93	0.00
Oconto AA	3	8.11	0.00	0.00	33.97	33.33	66.03	66.67	0.00	0.00	1.60	0.00	1.67	1.56	0.00
Sheboygan AA	1	2.70	0.00	0.00	10.78	0.00	75.94	100.00	13.28	0.00	0.18	0.00	0.00	0.25	0.00
Non metropolitan Areas	5	13.51	0.00	0.00	10.55	0.00	89.45	100.00	0.00	0.00	1.01	0.00	0.00	1.10	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

** 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 housing units in a particular geography divided by number of owner-occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: WISONSIN				Evaluation Period: January 1, 2008 TO December 31, 2008							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	416	64.10	4.46	1.92	12.07	4.33	46.58	43.75	36.88	50.00	1.11	0.55	0.45	1.09	1.36
Limited Review:															
La Crosse AA	32	4.93	0.00	0.00	11.09	0.00	75.06	87.50	13.85	12.50	1.03	0.00	0.00	1.17	0.88
Oconto AA	43	6.63	0.00	0.00	33.97	27.91	66.03	72.09	0.00	0.00	3.15	0.00	2.65	3.40	0.00
Sheboygan AA	34	5.24	0.00	0.00	10.78	2.94	75.94	88.24	13.28	8.82	1.03	0.00	0.31	1.28	0.48
Non metropolitan Areas	124	19.11	0.00	0.00	10.55	4.03	89.45	95.97	0.00	0.00	3.41	0.00	3.73	3.40	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

Table 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTIFAMILY		Geography: WISCONSIN								Evaluation Period: January 1, 2008 TO December 31, 2008					
MA/Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	4	57.14	12.61	0.00	19.46	50.00	48.14	50.00	19.79	0.00	0.78	0.00	1.79	0.83	0.00
Limited Review:															
La Crosse AA	2	28.57	0.00	0.00	43.47	100.00	54.78	0.00	1.75	0.00	2.50	0.00	5.41	0.00	0.00
Oconto AA	0	0.00	0.00	0.00	17.11	0.00	82.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sheboygan AA	0	0.00	0.00	0.00	32.21	0.00	62.80	0.00	4.99	0.00	0.00	0.00	0.00	0.00	0.00
Non metropolitan Areas	1	14.29	0.00	0.00	9.88	0.00	90.12	100.00	0.00	0.00	2.44	0.00	0.00	2.44	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

** 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 housing units in a particular geography divided by number of multi-family housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: WISCONSIN					Evaluation Period: January 1, 2008 TO December 31, 2008				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Milwaukee AA	469	47.96	8.36	5.12	13.53	5.54	42.55	39.02	34.98	50.32	1.07	1.35	0.60	1.02	1.27						
Limited Review:																					
La Crosse AA	58	5.93	0.00	0.00	20.66	15.52	68.05	68.97	11.29	15.52	2.17	0.00	1.76	2.29	2.95						
Oconto AA	69	7.06	0.00	0.00	33.03	27.54	66.97	72.46	0.00	0.00	5.95	0.00	6.03	6.42	0.00						
Sheboygan AA	71	7.26	0.00	0.00	16.80	1.41	71.39	97.18	11.81	1.41	2.18	0.00	0.22	3.06	0.23						
Non metropolitan Areas	311	31.80	0.00	0.00	11.66	9.97	88.34	90.03	0.00	0.00	7.36	0.00	9.09	7.81	0.00						

* Based on 2008 Peer Small Business Data: US.

** 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 2008.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WISCONSIN						Evaluation Period: January 1, 2008 TO December 31, 2008							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	15	3.46	2.42	0.00	5.09	0.00	48.38	66.67	43.96	33.33	5.60	0.00	0.00	6.41	5.10
Limited Review:															
La Crosse AA	16	3.70	0.00	0.00	4.07	6.25	86.63	93.75	9.30	0.00	37.21	0.00	50.00	39.47	0.00
Oconto AA	35	8.08	0.00	0.00	38.87	45.71	61.13	54.29	0.00	0.00	24.14	0.00	32.00	20.21	0.00
Sheboygan AA	15	3.46	0.00	0.00	2.13	0.00	85.50	100.00	12.37	0.00	6.05	0.00	0.00	6.61	0.00
Non metropolitan Areas	352	81.29	0.00	0.00	12.21	6.25	87.79	93.75	0.00	0.00	49.16	0.00	48.89	49.62	0.00

* Based on 2008 Peer Small Business Data: US.

** 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 2008.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WISCONSIN								Evaluation Period: January 1, 2008 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	142	75.94	19.84	9.93	17.89	26.24	23.61	24.11	38.65	39.72	0.81	1.19	0.87	0.69	0.79
Limited Review:															
La Crosse AA	7	3.74	16.24	0.00	19.83	28.57	26.51	57.14	37.43	14.29	0.58	0.00	0.62	1.20	0.24
Oconto AA	3	1.60	20.72	0.00	24.07	66.67	28.52	0.00	26.69	33.33	0.76	0.00	2.20	0.00	0.74
Sheboygan AA	9	4.81	14.72	0.00	19.38	11.11	29.30	44.44	36.60	44.44	0.61	0.00	0.24	0.93	0.88
Non metropolitan Areas	26	13.90	17.73	15.38	20.19	7.69	27.05	19.23	35.03	57.69	2.17	4.65	0.77	1.40	3.01

* Based on 2008 Peer Mortgage Data: Western Region.

** 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 0.6% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: WISCONSIN						Evaluation Period: January 1, 2008 TO December 31, 2008						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	% Families***	% BANK****	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	25	67.57	19.84	4.17	17.89	16.67	23.61	33.33	38.65	45.83	0.68	0.30	0.57	0.80	0.74
Limited Review:															
La Crosse AA	3	8.11	16.24	0.00	19.83	0.00	26.51	33.33	37.43	66.67	0.76	0.00	0.00	0.79	1.43
Oconto AA	3	8.11	20.72	0.00	24.07	66.67	28.52	0.00	26.69	33.33	1.63	0.00	3.51	0.00	1.89
Sheboygan AA	1	2.70	14.72	0.00	19.38	0.00	29.30	100.00	36.60	0.00	0.18	0.00	0.00	0.51	0.00
Non metropolitan Areas	5	13.51	17.73	0.00	20.19	20.00	27.05	40.00	35.03	40.00	1.07	0.00	1.33	1.35	1.00

* Based on 2008 Peer Mortgage Data: Western Region.

** 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 2.9% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WISCONSIN						Evaluation Period: January 1, 2008 TO December 31, 2008						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Milwaukee AA	416	64.10	19.84	5.6	17.89	17.81	23.61	25.19	38.65	51.40	1.21	1.13	1.11	1.08	1.35
Limited Review:															
La Crosse AA	32	4.93	16.24	0.00	19.83	12.50	26.51	43.75	37.43	43.75	1.12	0.00	0.67	1.54	1.29
Oconto AA	43	6.63	20.72	4.88	24.07	24.39	28.52	34.15	26.69	36.59	3.47	1.83	3.83	3.97	3.26
Sheboygan AA	34	5.24	14.72	11.11	19.38	18.52	29.30	48.15	36.60	22.22	0.89	1.49	0.69	1.29	0.55
Non metropolitan Areas	124	19.11	17.73	6.78	20.19	16.95	27.05	29.66	35.03	46.61	3.73	3.90	3.77	3.66	3.74

* Based on 2008 Peer Mortgage Data: Western Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage 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 6.0% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: WISCONSIN			Evaluation Period: January 1, 2008 TO December 31, 2008			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% 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	
Full Review:										
Milwaukee AA	470	48.01	63.15	46.17	57.87	19.57	22.55	1.07	1.47	
Limited Review:										
La Crosse AA	58	5.92	57.04	63.79	68.97	12.07	18.97	2.17	3.48	
Oconto AA	69	7.05	52.97	68.12	85.51	14.49	0.00	5.95	8.20	
Sheboygan AA	71	7.25	61.17	54.93	85.92	8.45	5.63	2.18	2.73	
Non metropolitan Areas	311	31.77	55.05	68.49	75.24	15.43	9.32	7.36	12.82	

* Based on 2008 Peer Small Business Data: US.

** 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 – 2008).

**** 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 24.33% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: WISCONSIN			Evaluation Period: January 1, 2008 TO December 31, 2008		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% 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
Full Review:									
Milwaukee AA	15	3.46	95.89	66.67	60.00	40.00	0.00	5.60	6.06
Limited Review:									
La Crosse AA	16	3.70	97.97	25.00	87.50	12.50	0.00	37.21	19.05
Oconto AA	35	8.08	98.52	80.00	74.29	25.71	0.00	24.14	30.43
Sheboygan AA	15	3.46	96.80	73.33	66.67	13.33	20.00	6.05	6.08
Non metropolitan Areas	352	81.29	98.77	82.39	76.42	18.75	4.83	49.16	54.51

* Based on 2008 Peer Small Business Data: US.

** 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 - 2008).

**** 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 31.71% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WISCONSIN				Evaluation Period: January 1, 2008 TO December 31, 2008			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Milwaukee AA	1	9	14	10,263	15	10,272	100.00	0	0
Limited Review:									
La Crosse AA	0	0	0	0	0	0	0	0	0
Oconto AA	0	0	0	0	0	0	0	0	0
Sheboygan AA	0	0	0	0	0	0	0	0	0
Non metropolitan Areas	0	0	0	0	0	0	0	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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: WISCONSIN			
Evaluation Period: January 1, 2008 TO December 31, 2008																	
MA/Assessment Area:	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
Full Review:																	
Milwaukee AA	72.21	38	69.09	2.63	13.16	28.95	55.26	0	0	0	0	0	0	11.87	16.37	42.27	29.29
Limited Review:																	
La Crosse AA	1.70	2	3.64	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	19.38	69.70	10.92
Oconto AA	5.51	4	7.27	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	30.93	69.07	0.00
Sheboygan AA	4.39	2	3.64	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	16.35	71.79	11.85
Non metropolitan Areas	16.18	9	16.36	0.00	0.00	100.0	0.00	0	1	0	0	-1	0	0.00	10.68	89.32	0.00