

PUBLIC DISCLOSURE

May 2, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Fox Valley Savings Bank
51 E 1st St
Fond Du Lac, WI 54935 -4203
Docket #: 03069**

**Office of Thrift Supervision
Central Region
1 South Wacker Drive
Suite 2000
Chicago, IL 60606**

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



Office of Thrift Supervision

Department of the Treasury

Central Region

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June 3, 2011

Board of Directors
Fox Valley Savings Bank
51 E 1st St
Fond Du Lac, WI 54935-4203

Enclosed is your institution's written Community Reinvestment Act (CRA) Performance Evaluation. The Office of Thrift Supervision (OTS) prepared the evaluation as of May 2, 2011. Pursuant to the provisions of the CRA and OTS regulations (12 C.F.R. 563e), your institution must make this evaluation and your institution's CRA rating available to the public.

In accordance with 12 C.F.R. 563e, your institution must make this written CRA Performance Evaluation available to the public within 30 business days of receiving it. You must place the evaluation in your CRA public file at your home office and at each branch within this time frame. You may not alter or abridge the evaluation in any manner. At your discretion, you may retain previous written CRA Performance Evaluation(s) with the most recent evaluation in your CRA public file.

Your institution may prepare a response to the evaluation. You may place the response in each CRA public file along with the evaluation. In the event your institution elects to prepare such a response, please forward a copy of it to this office.

All appropriate personnel, particularly customer contact personnel, need to be aware of the responsibilities that the institution has to make this evaluation available to the public. Consequently, we suggest that your institution review internal procedures for handling CRA inquiries, including those pertaining to the evaluation and other contents of the CRA public file.

We strongly encourage the Board of Directors, senior management, and other appropriate personnel to review this document and to take an active interest and role in the CRA activities of your institution. Please acknowledge receipt of this evaluation by signing the attached Board signature page and retaining a copy of the acknowledgment.

Sincerely,

Georgia A. Chisolm
Assistant Director - Compliance

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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Fox Valley Savings Bank. The Office of Thrift Supervision (OTS) prepared the evaluation as of May 2, 2011. OTS evaluates performance in assessment area(s) delineated by the institution rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. OTS rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 563e.

Institution

Overall Rating

INSTITUTION'S CRA RATING: **Satisfactory**
The Lending Test is rated: **Satisfactory**
The Community Development Test is rated: **Satisfactory**

Fox Valley Savings Bank (Fox Valley) is assigned a Community Reinvestment Act (CRA) rating of "Satisfactory" based upon the analyses performed during this examination. Fox Valley has a good record of meeting the credit needs of its communities, including those of moderate-income neighborhoods and low- and moderate-income families.

Fox Valley's loan-to-deposit ratio of 71.6 percent was reasonable and lending levels were substantially higher than during the prior review period.

Fox Valley originated a substantial majority of loans within its assessment area.

The distribution of Fox Valley's loans by borrower income is reasonable. The institution penetrated the low- and moderate-income segments of the assessment area population proportionately to other federally regulated lenders.

Less emphasis was placed on the geographic distribution of Fox Valley's loans within its assessment area, as there are only two moderate-income census tracts within the bank's assessment area.

Fox Valley's level of community development activities was adequate. The institution provided a high level of community development service through the volunteer efforts of its employees, but its level of community development investments was poor and community development lending marginally adequate.

Scope of Examination

Fox Valley was last evaluated for performance under the CRA on June 18, 2008, under the intermediate small savings association (ISSA) performance standards. The OTS expanded the evaluation criteria for an ISSA to add a community development test to the existing small savings association criteria. Fox Valley's performance for this evaluation is again based upon the standards for an ISSA.

The current evaluation covers Home Mortgage Disclosure Act (HMDA)-reportable lending for the 36-month period from January 1, 2008 through December 31, 2010. The bank's community

Institution (continued)

development activities were evaluated from June 18, 2008 (the date of the prior evaluation) through May 2, 2011 (the date of this evaluation).

Fox Valley originated 2,104 HMDA-reportable residential loans inside the assessment area during the review period.

The data used to compare Fox Valley's lending activity is that of the aggregate lenders (peer group) and is origination and purchase activity within the assessment area during 2009 (2010 peer data was not yet available). The data includes HMDA-reportable lending activity of federally-regulated financial institutions originating and purchasing loans within Fox Valley's assessment area.

Department of Housing and Urban Development (HUD) median family income estimates for the assessment area determined census tract and borrower income categories. According to CRA definitions, income is considered low if it is less than 50 percent of median family income, moderate if it is 50 percent to less than 80 percent, middle if it is 80 percent to less than 120 percent and upper if it is 120 percent or more.

Description of Institution

Fox Valley is a federally-chartered mutual thrift institution headquartered in Fond du Lac, Wisconsin. As of December 31, 2010, the institution had total assets of \$330.1 million. Fox Valley's primary business focus is to serve its communities by originating and servicing residential loans and providing deposit-related banking services to its customers.

Fox Valley has three offices that form the combined assessment areas. The main office is located in downtown Fond du Lac, WI, which is a middle-income area and is located in Fond du Lac County; Fond du Lac County comprises all of the Fond du Lac MSA. The Oshkosh branch office is located within the Oshkosh-Neenah MSA which consists of Winnebago County, and the Waupun branch is located within a non-MSA area in Dodge County. Because assessment area demographics are very similar in the areas surrounding the three branches and the area is made up of contiguous census tracts, the three areas were consolidated into one assessment area for this examination.

All of Fox Valley's offices are equipped with drive-up facilities and automated teller machines (ATMs). There are no known restrictions that would limit Fox Valley's ability to meet the credit needs of its communities, including those of low- and moderate-income families and neighborhoods.

Fox Valley originates owner- and non-owner-occupied, conventional one- to four-family residential mortgage loans and privately-insured owner-occupied single-family mortgage loans with a maximum loan-to-value ratio up to 80 percent. A large majority of residential loans originated during the

Institution (continued)

review period were fixed rate loans, and these loans were sold on the secondary market. However, Fox Valley retained the servicing on the sold loans, making the transaction invisible to its borrowers, and allowing it to continue to service its customers.

During most of the review period, the institution also offered special first time homebuyer loans with a maximum loan-to-value ratio up to 100 percent. If the borrower had at least a ten percent down payment, no private mortgage insurance (PMI) would be required. That program was discontinued in April 2010 due to more restrictive underwriting requirements by the PMI companies. Fox Valley now works with the Wisconsin Housing and Economic Development Authority (WHEDA) to originate loans for first time homebuyers. Fox Valley is also an FHA- and VA-authorized lender, but lending activity under these programs has been quite limited.

The institution also originates residential land, construction, multi-family and commercial real estate loans. Consumer loan originations consist of home improvement, home equity (both open- and closed-end), automobile, recreational vehicle, education, and personal unsecured loans.

According to the December 31, 2010 UTPR, the institution's mortgage loans totaled \$166.4 million and represented 50.4 percent of total assets. The mortgage loan portfolio consists primarily of one- to four-family residential loans totaling \$176.0 million, multifamily loans totaling \$25.0 million and nonresidential loans totaling \$29.4 million. The non-mortgage loan portfolio totaled \$3.2 million (or 0.8 percent of total assets) and consisted primarily of education and auto loans.

Fox Valley received a CRA rating of "Satisfactory" during its previous small institution CRA evaluation dated June 18, 2008.

Description of Assessment Area

Fox Valley has designated all of Fond du Lac County, the southern portion of Winnebago County (directly north of Fond du Lac County), and the northern portion of Dodge County (directly south of Fond du Lac County) as its assessment area. Fond du Lac County makes up the Fond du Lac Metropolitan Statistical Area (MSA). The Oshkosh Office is located in the southern part of Winnebago County, which makes up the Oshkosh-Neenah MSA. The Waupun Office is situated in Dodge County, just south of the Fond du Lac County line (the City of Waupun actually straddles the Fond du Lac and Dodge County border). Dodge County is not part of any MSA.

The assessment area consists of 54 contiguous census tracts in the three counties described above. The inclusion of only the southern portion of the Oshkosh-Neenah MSA and the northern portion of Dodge County is reasonable, given the institution's size and limited resources and the location of its

Institution (continued)

branches. The delineation of the assessment area does not arbitrarily exclude low- or moderate-income areas.

The HUD estimated median family incomes for the assessment area in 2008, 2009, and 2010 were \$61,570, \$64,241, and \$64,970, respectively.

Fox Valley’s 54 census tract assessment area has a population of 243,520 persons, which includes 91,570 households and 61,501 families. The area has 97,606 housing units, of which 65.7 percent are categorized as owner occupied housing units (OOHU’s). Multifamily units and rental units represent 13.2 and 30.8 percent of total housing units, respectively.

The following table summarizes the income level of the various census tracts within the assessment area, as well as the number and percentage of OOHU’s (which can be used as an indicator of demand for residential loans within tract income categories). The table also summarizes the number and percentage of families by income level.

Tract or Family Income	Census Tracts		Owner Occupied Housing		Families	
	Number	Percent	Number	Percent	Number	Percent
Low	0	0.0	0	0.0	8,922	14.5
Moderate	2	3.7	2,309	2.0	11,728	19.1
Middle	47	87.0	83,385	83.5	18,178	29.5
Upper	5	9.3	11,912	14.5	22,673	36.9
Totals	54	100.0	97,606	100.0	61,501	100.0

There are ample lending opportunities in the assessment area with HMDA-reportable loans for all federally regulated financial institutions totaling 12,152 in 2009. Based on most recent available data, the weighted average of median housing for the assessment area was \$101,710.

Conclusions With Respect To Performance Tests

LENDING TEST

Loan-to-Deposit Ratio

The loan-to-deposit ratio (LTD) is an indicator of whether the institution’s level of lending is reasonable in relationship to both its capacity to lend and its available lending opportunities.

Fox Valley’s LTD for the twelve quarters ended December 31, 2010, averaged 71.6 percent. This ratio is below the 95.4 percent average ratio for all similarly sized thrifts (those with assets of \$300 million to \$1 billion) nationwide for the same period.

Institution (continued)

A major reason the institution’s LTD is lower now than at the prior CRA examination is because approximately 95 percent of residential mortgage loans originated in 2008, 2009 and 2010 were fixed rate loans and were sold to the Federal Home Loan Bank (FHLB). By not keeping these loans in the bank’s portfolio, the bank was able to increase its liquidity and have more funds available to make additional loans.

Considering that lending has slowed down nationwide due to the mortgage meltdown and the fact this bank has sold nearly its entire residential mortgage loan portfolio to the FHLB, a 71.6 percent LTD is evidence that the bank is making the effort to make credit available in its community. The sale of its residential mortgage loans also explains the difference between the bank’s loan-to-deposit ratio and the peer’s.

Overall, Fox Valley’s loan-to-deposit ratio meets the standards for satisfactory performance.

Lending in the Assessment Area

The examiner conducted an analysis to determine the percentage of HMDA-reportable residential loans originated in the assessment area. During the 36-month review period ended December 31, 2010, Fox Valley had 2,247 HMDA-reportable loans. Fox Valley grants a significant majority of its loans within its assessment area, both in number of loans and in dollar volume. The table below indicates that 93.6 percent of the bank’s loans were granted within the assessment area. Of those loans granted within the assessment area, 83.3 percent were for refinance, 11.8 percent were for home purchase, and 4.8 percent were for home improvement.

Location	Number of Loans	Percent by Number	Amount of Loans (\$000s)	Percent by Amount
Inside	2,104	93.6%	\$233,618	91.9%
Outside	143	6.4%	\$20,721	8.1%
Totals	2,247	100.0%	\$254,339	100.0%

Based on the figures above, the examiner concludes that Fox Valley’s record of lending within the assessment area exceeds the standards for satisfactory performance for this criterion.

It is also important to note that between 2010 and 2011, Fox Valley made seven loans totaling \$825,620 in collaboration with the Wisconsin Housing and Economic Development Authority (WHEDA). WHEDA works closely with lenders, developers, local government, nonprofits, community groups and others to implement its low-cost financing programs. WHEDA helps provide low-cost, fixed-interest rate mortgages to low- and moderate-income individuals and

Institution (continued)

families to purchase their first home. WHEDA also works with developers to finance affordable rental housing, and support economic development and agriculture through its small business guarantee programs.

Lending to Borrowers of Different Incomes

The results of the examiner’s analysis of Fox Valley’s record of HMDA-reportable lending to borrowers of different income levels within the combined assessment areas, is presented in the following table. Results are compared to the demographic benchmark of families residing within the assessment area categorized by their median family income (MFI), updated from 2000 Census data, and also HMDA aggregate lending data for the year 2009.

Borrower Income Levels ^a	Fox Valley’s HMDA Loan Volume: 1/01/2008 through 12/31/2010 in the Assessment Area				Benchmarks	
	Number of Loans ^b	Percent of Number	Dollar Amount	Percent of Dollar Amount	2000 Percent of Families ^c	2009 Aggregate HMDA ^d
Low = <50%	132	6.3%	9,395,000	4.1%	14.5%	8.9%
Moderate = 50-79%	495	23.5%	42,565,000	18.2%	19.1%	24.2%
Middle = 80-119%	662	31.5%	68,229,000	29.2%	29.6%	29.6%
Upper = ≥ 120%	813	38.7%	113,153,000	48.5%	36.9%	37.3%
Total	2,102	100.0%	\$233,342,000	100.0%	100.0%	100.0%

As shown above, the institution’s percentage of loans made to low-income borrowers within the combined assessment areas was somewhat less than that of the 2009 average of all HMDA lenders. The institution’s portion of lending to low-income borrowers was also less than the demographic benchmark even when consideration is given to the 3.8 percent of households within the assessment area with incomes below the poverty level.

Lending to moderate-income borrowers exceeded area demographics and was within the range of aggregate HMDA lenders. These statistics document Fox Valley’s willingness to address the credit needs of moderate-income borrowers.

Considering the above, the examiner concludes that the institution meets the standards for satisfactory performance for lending to borrowers of different incomes.

Geographic Distribution of Loans

^a Defined based upon the MFI of the Fond du Lac MSA, the Oshkosh-Neenah MSA, and the median statewide non-MSA income.

^b Two loans on the LAR totaling \$248,000 did not have borrower income recorded and are omitted from this table.

^c Assessment area demographics indicate that 3.8 percent of the families living there had incomes below the poverty line.

^d The percentage of the number of residential loans originated in each of the borrower income categories by HMDA-reporting lenders (includes only those regulated by OTS, FDIC, Federal Reserve Board, and OCC) in the assessment area during year 2009 only.

Institution (continued)

The next table summarizes Fox Valley’s residential mortgage lending within the assessment area by census tract income designation during years 2008 through 2010 for HMDA-reportable mortgage loans. Results are compared to the percentage of homeownership by census tract income level, based upon 2000 census data, and the aggregate results of HMDA reporters that originated residential mortgage loans within the assessment areas in the year 2009.

Income Level of Census Tract ^e	Fox Valley’s HMDA Loan Volume: 1/01/2008 through 12/31/2010 in the Combined Assessment Areas					Benchmarks		
	Number/ Percentage of Tracts	Number of Loans	Percent of Number	Dollar Amount	Percent of Dollar Amount	2000 Percent of O.O.H.U. ^f	2009 Aggregate HMDA ^g	
Moderate = 50-79%	2	3.7%	14	.7%	\$1,013,000	.4%	2.0%	3.7%
Middle = 80-119%	47	87.0%	1,672	79.5%	\$170,859,000	73.2%	83.5%	87.0%
Upper = ≥ 120%	5	9.3%	418	19.8%	\$61,746,000	26.4%	14.5%	9.3%
Total	54	100.0%	2,104	100.0%	\$233,618,000	100.0%	100.0%	100.0%

As shown above, the institution’s lending performance in moderate-income census tracts was less than that of the aggregate HMDA lenders and the demographic benchmark. The two moderate income census tracts represent only 3.7 percent of the assessment area census tracts and thus do not have a significant impact on this rating segment. Nevertheless the institution’s distribution of loans in moderate-income census tracts reflects poor dispersion..

Considering the above, the examiner concludes that the institution marginally meets the standards for a satisfactory performance for lending in geographies of different incomes.

Lending Test Conclusion:

During the review period, Fox Valley maintained a relatively high LTD that demonstrated that a majority of the bank’s deposits were invested in loans. The substantial majority of the bank’s HMDA loans were secured by properties within the assessment areas. The bank’s lending to LMI borrowers was acceptable relative to area demographics and peer lending. The institution generated a smaller percentage of loans in moderate income census tracts compared to both demographics and aggregate HMDA lenders. Nonetheless, the examiner noted that the institution almost tripled its lending volume to 2,104 loans in the assessment area, compared to 712 loans during the prior review period. The bank also increased the size of its assessment area, allowing it to make credit available to a larger

^e The assessment area contains no low-income census tracts.

^f Owner Occupied Housing Units. The numbers in this column represent the distribution percentage of owner occupied housing units in census tracts by income level, to the total number of owner occupied housing units in the combined assessment areas.

^g The percentage of the number of conventional loans originated in each of the census tract income categories by HMDA-reporting lenders (includes only those regulated by OTS, FDIC, Federal Reserve Board, and OCC) in the assessment areas during year 2007 only.

Institution (continued)

segment of the population. Based upon these findings, Fox Valley is assigned a “Satisfactory” rating under the Lending Test.

COMMUNITY DEVELOPMENT TEST

Community development is defined as loans, services, and/or investments that provide or assist in providing affordable housing and community services targeted to low- and moderate-income individuals. It also includes activities that promote economic development and that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, and distressed or underserved nonmetropolitan middle income geographies.

Community Development Lending

- In 2010, Fox Valley made a \$242,000 loan to the Fond du Lac Economic Development Corporation (FCEDC) for the purchase of a commercial building which now serves as the FCEDC’s new office. This organization strives to improve the economic well being of the businesses, communities and residents in the county. It assists companies interested in doing business in the county with financing, workforce development, regulatory and productivity issues. With this new building, the FCEDC has increased meeting and conference space that will allow for more client meetings to occur simultaneously, thus allowing more clients to be served; the ability to develop additional programs such as entrepreneurial mentoring programs and CEO or industry roundtables; the ability to host business events such as entrepreneurial or equity networking opportunities; and, an ability to assure long-term sustainability of FCEDC as an organization.

Community Development Investments

- The institution gives a donation of \$2,600 on an annual basis to the FCEDC, for a total of \$7,800 over the review period. This is a county-wide private/public partnership that provides community development assistance to existing businesses and small start-up businesses. The Corporation also aims to attract businesses to Fond du Lac County, help support the local economy, and provide services to communities and community leaders in areas of economic development.
- In 2009, Fox Valley made a \$50,000 donation to the renovation of the local YMCA which would house the Fond du Lac Boys and Girls Club. This investment was specifically designated to help the Fond du Lac Boys and Girls Club after its original building burnt down. Seventy-one percent of the children who attend the Fond du Lac Boys and Girls Club qualify for free or reduced meals in their respective schools. This is an indication they come from low- or moderate-income families.

Institution (continued)

Community Development Services

During the review period Fox Valley created programs or participated in program that facilitated the purchase of homes:

- Fox Valley provided the First-Time Home Buyer program which offered up to 95 percent loan-to-value with reduced or no closing costs. This service provided several families and individuals the opportunity to purchase a home that otherwise would not have been affordable. This program ended in April 2010, due to the difficulty of obtaining private mortgage insurance in the current economic climate.
- The bank collaborated with the ADVOCAP Homeowner Development Program to originate loans. The ADVOCAP program provides education and opportunities for households to acquire a home of their own, as well as down payment assistance for qualified persons. The program is supported by local lenders and real estate professionals.
- Fox Valley originates loans in collaboration with the Federal Housing Administration and are known as FHA loans. An FHA loan means the loan is insured by the FHA and this allows the lender to offer the borrower low down payment options, low closing costs and flexible credit requirements.

In addition to programs, the bank's Board of Directors and employees have contributed numerous hours to other community development services such as the following:

- A Fox Valley Board member was on the Economic Restructuring Committee of the Fond du Lac Downtown Partnership. The Board member offered his financial expertise and worked with the City of Fond du Lac in authoring the Downtown Development Plan which sought out to bring economic development to the downtown area, enhance the values of downtown properties, and create and support an economic climate to support local businesses. In addition, he assisted numerous businesses in business preparedness, providing an estimated 12 hours of service.
- A Fox Valley Board member served as the 2008 Chairman of Fond Du Lac County Economic Development Corp. He provided financial expertise to an organization that strives to improve the economic well being of the businesses, communities and residents in the county. It assists companies interested in doing business in the county with financing, workforce development, regulatory and productivity issues. He served an estimated four hours.
- A Fox Valley Board member served on the Membership Committee at the local YMCA. As part of this committee, he was able to provide qualifying low-income families with financial aid through the Strong Kids Program. When a person or family is unable to pay for

Institution (continued)

membership or programs, scholarships are provided through donations to the YMCA Strong Kids Campaign. An estimated 24 hours of service were dedicated to this project.

- A Fox Valley Board member served as the 2008 Chairman of the Fond Du Lac Association of Commerce. The association strives to maintain the economic viability of the businesses within the community. The Board member dedicated approximately 12 hours.
- A Fox Valley Board member is the current Vice President of the Fond Du Lac Downtown Partnership. He provides financial expertise to the partnership which promotes economic development and revitalization. He has contributed 12 estimated hours.
- One Fox Valley representative served as the 2008 and 2009 President of the Fond du Lac Boys and Girls Club and as the 2010 Board Member of the Fond du Lac United Way. Within these two positions, the representative was able to provide financial expertise and make financial decisions regarding the organizations. Statistics for this particular Boys and Girls Club show 71 percent of the children qualify for free or reduced meals in their respective schools which is an indication that they come from low- or moderate-income families. The bank representative contributed approximately 36 hours of service.
- During 2008, 2009 and 2010, a Fox Valley representative served on the Screening Committee of Habitat for Humanity of Winnebago County. He used his financial expertise to help the committee evaluate low-income families in order to help them achieve their goal of owning a home. The representative dedicated approximately 36 hours to this cause.
- In 2008, a representative of Fox Valley served as a member of the Dodge County Home Buyers Council. As part of this organization, the member was able to provide seminars to families interested in owning a home and advised them on how to get started in the process. The representative contributed an estimated 12 hours of service.
- A Fox Valley representative served as a 2008, 2009, and 2010 Board member of the Volunteer Center of Fond du Lac County. The representative contributed financial expertise to this organization whose main purpose is to mobilize people and resources within the community and help poverty stricken women by matching them up with a volunteer-guide. The representative dedicated 72 estimated hours to this cause.
- Two representatives of Fox Valley contribute their financial expertise to the Stabilization Committee of the Waupun Community Development Authority. The organization strives to improve the economic well being of the businesses, communities and residents of the county by promoting business development, community preparedness and consultation, and workforce development. They have served a combined 36 hours.
- A Fox Valley representative served as a 2008 and 2009 Board member of Habitat for Humanity. She provided her financial expertise and participated in making financial decisions that impacted the organization and the people it sought to help. Her contribution was of approximately 24 hours.
- Three Fox Valley representatives served on the Community Housing Resource Board. One representative served as the 2008, 2009, and 2010 Treasurer; she has recently retired and

Institution (continued)

a new Fox Valley employee has taken over the position of Treasurer. The third bank representative served as a general member in 2008 and 2009. The Community Housing Resource Board provides information to the community for affordable rental housing units geared to low-income families and many times subsidized by the government. Information was distributed in English as well as the languages spoken by the minority groups in Fond du Lac. The representatives contributed approximately 60 hours of service.

- Fox Valley has a representative that travels to the area's grade schools and teaches the students about the importance of starting a savings account and savings in general. This was done throughout the 2008, 2009 and 2010 school years with 240 estimated hours.
- In 2008 and 2009, Fox Valley co-sponsored an annual day camp called "The Ultimate Money Quest." The program is geared directly to the middle school age students and teaches them how to make smart financial choices. In each of those years, Fox Valley helped plan and teach one of the sessions with 48 estimated hours of service.
- Four employees volunteered in the program "Reality Day" in 2008, 2009, and 2010. This program is geared towards high school students and provides them with real life scenarios by helping them choose a career, set a household budget based on their income, maintain that budget and manage their personal accounts. The employees took part in this one-day event held in November and April and participated in monthly meetings contributing an estimated 124 hours of service.
- Two Fox Valley employees volunteered to teach and plan events during "Money Smart Week," a week long event provided by many area businesses with the purpose of promoting financial literacy. The employees participated in 2008, 2009 and 2010 providing 51 estimated hours of service.
- The Investment Department organizes and presents four to six seminars throughout the year on several financial topics. The lending department also organizes and presents a Homebuyers Seminar, Credit Smart Seminars, and Realtor Seminars to help educate the public about lending issues. Other employees present seminars about credit cards to high school students and provide training to ADVOCAP participants. The seminars were done in all three years of the review period, with employees contributing 60 estimated hours.
- Fox Valley provides personalized banking for seniors that live at Lake View Estates in Fond du Lac. Lake View Estates is a senior living facility that accommodates mostly lower-income seniors. The Savings Department goes to the facility every Monday and provides banking services to seniors with limited mobility who have requested the banking services.

Response to Complaints

Fox Valley did not receive any complaints regarding its CRA performance since the previous examination.

Institution (continued)

Fair Lending or Other Illegal Credit Practices Review

The examiner reviewed the results of the most recent OTS Compliance Examination conducted in October 2010. Some of the items reviewed during that exam were the Fair Lending laws and regulations, including the Equal Credit Opportunity Act (ECOA), OTS Nondiscrimination Regulations, and Home Mortgage Disclosure Act (HMDA). The report concluded there were no violations of the Fair Lending laws and regulations nor was there evidence of other illegal credit practices.

CRA Rating Definitions

There are five separate and distinct CRA assessment methods set forth in the CRA: the lending, investment, and service tests for large, retail institutions; the intermediate small institution test for intermediate small savings associations; the streamlined examination method for small institutions; the community development test for wholesale and limited purpose institutions; and the strategic plan option for all institutions. OTS will assign an institution one of the four assigned ratings required by Section 807 of the CRA:

1. "Outstanding record of meeting community credit needs."
2. "Satisfactory record of meeting community credit needs."
3. "Needs to improve record of meeting community credit needs."
4. "Substantial noncompliance in meeting community credit needs."

OTS judges an institution's performance under the test and standards in the rule in the context of information about the institution, its community, its competitors, and its peers. Among the factors to evaluate in an examination are the economic and demographic characteristics of the assessment area(s); the lending, investment, service, and community development opportunities in the assessment area(s); the institution's product offerings and business strategy; the institution's capacity and constraints; the prior performance of the institution; in appropriate circumstances, the performance of a similarly situated institution; and other relevant information. An institution's performance need not fit each aspect of a particular rating profile in order to receive that rating, and exceptionally strong performance with respect to some aspects may compensate for weak performance in others. The institution's overall performance, however, must be consistent with safe and sound banking practices and generally with the appropriate rating profile. In addition, OTS adjusts the evaluation of an institution's performance under the applicable assessment method in accordance with §563e.21 and §563e.28, which provide for adjustments on the basis of evidence of discriminatory or other illegal credit practices.