



## **PUBLIC DISCLOSURE**

April 17, 2023

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

The Peshtigo National Bank  
Charter Number 5658

250 French Street  
Peshtigo, WI 54157

Office of the Comptroller of the Currency

1200 North Mayfair Road, Suite 200  
Milwaukee, WI 53226

**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.

## Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review.....	3
State Rating.....	4
State of Wisconsin.....	4
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

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

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

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the needs of its assessment area (AA).
- The bank originated a substantial majority of their loans within their AA.
- The borrower distribution of loans reflects reasonable distribution among borrowers of different income levels and farms of different sizes.
- The geographic distribution of home mortgage loans and farm loans reflects excellent distribution among geographies.

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and the credit needs of the AAs, the bank's loan-to-deposit ratio is reasonable.

The bank's quarterly LTD ratio averaged 59.39 percent over the 18 quarters from September 30, 2018, to December 31, 2022. The bank ranks fourth in a peer group of six similarly situated banks, with peer LTD data ratios ranging from 39.03 percent to 78.56 percent in the specified time period. The banks in this peer group have total assets ranging from \$29.8 million to \$656.1 million.

### **Lending in Assessment Area**

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 80.7 percent of its total loans by number inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See the table below for additional detail.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2019	59	81.9	13	18.1	72	5,822	66.5	2,928	33.5	8,750
2020	50	83.3	10	16.7	60	5,064	73.1	1,860	26.9	6,924
2021	36	80.0	9	20.0	45	5,892	73.9	2,082	26.1	7,974
Farm Loans										
2019-2021	56	77.8	16	22.2	72	13,149	81.9	2,898	18.1	16,048
<b>Total</b>	<b>201</b>	<b>80.7</b>	<b>48</b>	<b>19.3</b>	<b>249</b>	<b>29,927</b>	<b>75.3</b>	<b>9,822</b>	<b>24.7</b>	<b>39,749</b>
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

## Description of Institution

The Peshtigo National Bank (PNB) is a \$264.4 million intrastate financial institution headquartered in Peshtigo, Wisconsin. The bank is 100 percent owned by Peshtigo National Bancorporation, Inc., a one-bank holding company headquartered in Peshtigo, Wisconsin.

The main office is located in a middle-income census tract (CT). The bank operates four full-service branches in addition to the main office. The Gillett, Wisconsin branch is located in a moderate-income CT, while all other branches are located in middle-income CTs. No branches have opened or closed during the evaluation period. All locations have Automated Teller Machines.

PNB offers traditional community bank products and services, and its total loan portfolio represents 57.3 percent of total assets. By dollar volume, the loan portfolio is 66.7 percent commercial loans and 33.3 percent retail loans. The largest portfolios consist of the loans secured by farmland, representing 27.1 percent and the one-to four-family closed end portfolio, representing 29.8 percent. Tier 1 capital totals \$24.5 million dollars. All preceding loan information is as of March 31, 2023.

PNB has two AAs, including one AA in a Metropolitan Statistical Area (MSA). The MSA AA consists of Oconto County, which is part of the Green Bay MSA. The non-MSA AA includes all of Marinette County and a portion of Shawano County. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate- income geographies.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AAs. PNB was evaluated using the Small Bank procedures and received a Satisfactory rating at its prior CRA examination, dated November 5, 2018.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated the Peshtigo National Bank's performance using the Small Bank procedures. The evaluation period for this CRA examination is from November 5, 2018, through April 17, 2023. The Lending Test assesses the bank's record of meeting credit needs of its AA through lending activities during the evaluation period of January 1, 2019, through December 31, 2021. We reviewed data for the bank's primary loan products, including farm loans and residential loans, to evaluate the bank's lending performance.

To assess lending, we used data from bank reports and a random sample of loans for each primary loan product originated or purchased in the bank's AA. Our lending analysis used the most recent available demographic and aggregate peer lending data.

The federal banking agencies are now updating decennial census data every five years, beginning with the Census Bureau's 2015 American Community Survey (ACS). This change was implemented in order to provide more current and accurate demographic data. During the current evaluation period, the bank's AAs were not affected by this change, and the lending data from 2019 through 2021 received the same analysis based on the 2015 ACS. Data is discussed in the applicable narrative sections of this evaluation.

### **Selection of Areas for Full-Scope Review**

We selected the Green Bay MSA AA for a full scope review based on lending volume for the primary products being higher in this AA, as well as the Peshtigo non-MSA being selected for a full-scope review at the previous CRA evaluation.

### **Ratings**

The bank's overall rating is based on the performance in its entire AA. However, more weight is placed on the Green Bay MSA AA for lending test conclusions, with supplemental considerations given for performance in the Peshtigo non-MSA AA.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Wisconsin

**CRA rating for the State of Wisconsin:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes and farms of different sizes.
- The geographic distribution of home mortgage loans and farm loans reflects excellent distribution among geographies.
- There were no CRA related complaints during the evaluation.

### Description of Institution's Operations in Wisconsin

PNB has two AAs, including one AA in an MSA. The MSA AA consists of Oconto County, which is part of the Green Bay MSA. The non-MSA AA includes all of Marinette and Shawano counties. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

According to the 2015 US Census Data, the bank's Peshtigo non-MSA AA is comprised of 24 CTs, of which zero are low-income, four (16.67 percent) are moderate income, nineteen (79.17 percent) are middle income, zero are upper income, and one (4.17 percent) is not given an income designation. The total population of the AA is 82,850, with 22,645 total families. The percent of families at each income level is 20.1 percent low income, 21.1 percent moderate income, 24.6 percent middle income, and 34.2 percent upper income. The weighted average of median family income is \$56,475, and the FFIEC estimates that median family income increased to \$69,600 in 2021. The percentage of households below the poverty level is 12.14 percent. Owner-occupied units comprise 52 percent of total housing units. Based on the 2015 demographic data, the total number of farms with reported revenues in this AA was 444. Of these 444 farms, 424 (95.5 percent) had revenues of \$1 million or less, and 14 (4.52 percent) had revenues of greater than \$1 million. Six farms did not report income.

The Green Bay MSA AA, which contains Oconto County, is comprised of 11 CTs, of which zero are low income, three (27.27 percent) are moderate income, six (54.55 percent) are middle income, and one (9.09 percent) is upper income. The total population of this AA is 37,476, with 10,867 families. The

percent of families at each income level is 20.9 percent low income, 19.9 percent moderate income, 23.8 percent middle income, and 35.4 percent upper income. The weighted average of median household income is \$64,620, and the FFIEC estimates that median family income increased to \$80,100 in 2021. The percentage of households below the poverty level is 9.64 percent. Owner-occupied units comprise 54.63 percent of total housing units. Based on the 2015 demographic data, the total number of farms with reported revenues in this AA was 240. Of these 240 farms, 234 (97.50 percent) had revenues of \$1 million or less, and five (5.68 percent) had revenues of greater than \$1 million. One farm did not report income.

The overall economy within the AA is generally stable. The largest employers are located in the cities of Marinette, Peshtigo, and Coleman. Major employers include Fincantieri Marinette Marine, the Bay Area Medical Center, Bellin Health, Aacer Flooring, the Badger Paper Mill, Great Lakes Tool, and Sentinel Structures.

The annual unemployment rates as of December 2022 for Marinette and Shawano Counties were 3.3 and 2.3 percent, respectively. The annual unemployment rate for the State of Wisconsin during the same time period was 2.2 percent, which is lower than the unemployment rate of Shawano and Marinette Counties. The unemployment rate of Oconto County was 2.7 percent, which is also higher than the State of Wisconsin. PNB has a continued commitment to serve the needs of its community and remains an integral financial partner in the communities it has served since 1901. The bank continues to grow and evolve in order to meet the needs of its customers and communities.

Competition from other financial institutions is strong. The bank ranks third of 14 banks in relation to total deposits within the AA. However, much larger competitor banks, including Associated Bank, BMO Harris, Nicolet National Bank, and Flagstar Bank, pose strong competition to PNB's ability to originate loans. Further, and not included in this list, is increasingly strong competition from credit unions within their market. Discussions with bank management noted that these competitors are very difficult to compete with on loan pricing.

We performed one community contact with a former member of an economic development finance committee for the City of Peshtigo. Overall, the credit needs of the community are being identified and met. Companies in the local economy are expanding, and the additional demand for workers is being met. These companies have also been successfully drawing resources from larger cities and towns nearby such as Green Bay. The housing market in Peshtigo remains tight, however; this is largely due to border restrictions and unsuitable wetland areas which cannot be built upon.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Combined 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	35	0.0	20.0	71.4	2.9	5.7
Population by Geography	120,326	0.0	17.1	75.7	7.2	0.0
Housing Units by Geography	74,794	0.0	24.5	71.2	4.3	0.0
Owner-Occupied Units by Geography	39,711	0.0	18.3	74.2	7.5	0.0
Occupied Rental Units by Geography	11,051	0.0	15.6	83.3	1.1	0.0
Vacant Units by Geography	24,032	0.0	38.9	60.7	0.4	0.0
Businesses by Geography	6,432	0.0	14.2	79.2	6.6	0.0
Farms by Geography	684	0.0	18.3	73.2	8.5	0.0
Family Distribution by Income Level	33,512	20.4	20.7	24.4	34.5	0.0
Household Distribution by Income Level	50,762	23.9	18.0	19.8	38.3	0.0
Median Family Income MSA - 24580 Green Bay, WI MSA		\$67,666	Median Housing Value			\$128,918
Median Family Income Non-MSAs - WI		\$60,742	Median Gross Rent			\$621
			Families Below Poverty Level			7.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Wisconsin

The Wisconsin state rating is based on results from the evaluation of performance across both AAs, with more weight placed on the full scope review completed for the Green Bay MSA AA.

## LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Green Bay MSA AA is good.

## Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State.

### *Home Mortgage Loans*

Refer to table O in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.



The borrower distribution of loans reflects reasonable distribution among borrowers of different geographies. There are no low-income CTs located in the AA. The bank originated 23.7 percent of home mortgage loans in moderate-income geographies. This is above both the demographic and aggregate lending data that indicates 21.3 percent and 17.7 percent, respectively, in moderate-income geographies.

### ***Small Loans to Farms***

Refer to table S in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of loans reflects excellent distribution among borrowers of different geographies. There are no low-income CTs located in the AA. The bank originated 54.3 percent of their farm loans to borrowers in moderate-income geographies. This is significantly above the demographic and aggregate lending data, which show 34.4 percent and 35.6 percent in moderate-income geographies, respectively.

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

The bank exhibits reasonable distribution of loans to individuals of different income levels and farms of different sizes, given the product lines offered by the bank.

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

Refer to table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits reasonable distribution of loans to individuals of different income levels. The bank originated 9.2 percent of its home mortgages to low-income families. This percentage is less than both the demographic data showing 20.9 percent of families are low income and the aggregate lending data of 9.8 percent to low-income families. The bank originated 23.7 percent of home mortgages to moderate-income families, which exceeds both the demographic data showing 19.9 percent of families are moderate-income and aggregate lending data of 20.7 percent to moderate-income families.

### ***Small Loans to Farms***

Refer to table T in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of loans reflects reasonable distribution among businesses of different sizes. The bank originated 68.6 percent of its farm loans to AA small farms (farms with gross annual revenues of \$1 million or less). This percentage of loans to small farms is less than the percentage of small farms in the AA, which is 97.5 percent. However, the bank significantly exceeds the aggregate lending data, which shows 20.1 percent of peer business lending in the AA was to small farms.

### **Responses to Complaints**

There were no CRA related complaints filed within the state of Wisconsin.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited scope review, the bank's performance under the Lending Test in the non-MSA AA is similar to the bank's overall performance.

## 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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	1/1/19 to 12/31/21	
<b>Bank Products Reviewed:</b>	home mortgage and small farm	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Wisconsin</b>		
Green Bay MSA AA	Full Scope	All of Oconto County
Non-MSA AA	Limited Scope	All of Marinette and Shawano Counties

## Appendix B: Summary of MMSA and State Ratings

---

RATINGS    The Peshtigo National Bank	
Overall Bank:	Lending Test Rating
The Peshtigo National Bank	Satisfactory
MMSA or State:	
Wisconsin	Satisfactory

## Appendix C: Definitions and Common Abbreviations

---

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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-Scope 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:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 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.



## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - 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 aggregate peer data for the years the data is available. Because aggregate 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 T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Peshtigo Green Bay MSA AA 2021	76	8,908	52.4	7,463	0.0	0.0	0.0	21.3	23.7	17.7	55.8	69.8	51.6	23.0	6.6	30.8	0.0	0.0	0.0
Peshtigo Non MSA AA 2021	69	7,870	47.6	10,795	0.0	0.0	0.0	16.8	5.8	16.7	83.2	94.2	83.3	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>145</b>	<b>16,778</b>	<b>100.0</b>	<b>18,258</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>18.7</b>	<b>15.2</b>	<b>17.1</b>	<b>71.3</b>	<b>81.4</b>	<b>69.6</b>	<b>9.9</b>	<b>3.44</b>	<b>13.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Peshtigo Green Bay MSA AA 2021	76	8,908	52.4	7463	20.9	9.2	9.8	19.9	23.7	20.7	23.8	28.9	23.1	35.4	35.5	33.6	0.0	2.7	12.8
Peshtigo Non MSA AA 2021	69	7,870	47.6	10,795	20.1	13.0	7.8	21.1	15.9	21.2	24.6	20.3	22.4	47.8	34.6	36.4	0.0	2.9	12.4
<b>Total</b>	<b>145</b>	<b>16,778</b>	<b>100.0</b>	<b>18,258</b>	<b>20.4</b>	<b>11.0</b>	<b>8.6</b>	<b>20.6</b>	<b>20.0</b>	<b>21.0</b>	<b>24.3</b>	<b>24.8</b>	<b>22.7</b>	<b>34.7</b>	<b>41.4</b>	<b>35.2</b>	<b>0.0</b>	<b>2.8</b>	<b>12.5</b>

Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2019-21</b>	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Peshtigo Green Bay MSA AA 2021	35	9,468	--	278	0.0	0.0	0.0	34.4	54.3	35.6	42.2	28.6	38.5	23.5	17.1	25.9	0.0	0.0	0.0	
Peshtigo Non MSA AA 2021	21	3,681	--	559	0.0	0.0	0.0	9.7	4.8	4.5	90.3	95.2	95.5	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>56</b>	<b>13,149</b>	<b>--</b>	<b>837</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>17.9</b>	<b>35.7</b>	<b>14.8</b>	<b>74.3</b>	<b>53.6</b>	<b>76.6</b>	<b>7.8</b>	<b>10.7</b>	<b>8.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2019-21</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Peshtigo Green Bay MSA AA 2021	35	9,468	62.5	278	97.5	68.6	20.1	2.5	28.6	0.4	2.9		
Peshtigo Non MSA AA 2021	21	3,681	37.5	559	95.6	76.2	28.4	3.2	23.8	1.3	0		
<b>Total</b>	<b>56</b>	<b>13,149</b>	<b>100%</b>	<b>837</b>	<b>96.2</b>	<b>71.5</b>	<b>25.7</b>	<b>3.0</b>	<b>26.7</b>	<b>1.0</b>	<b>1.8</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.