



**PUBLIC DISCLOSURE**

April 17, 2023

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Prevail Bank  
Charter Number 703235

675 E. Broadway Avenue  
Medford, WI 54451-1750

Office of the Comptroller of the Currency

Milwaukee Field Office  
High Pointe on Mayfair  
1200 North Mayfair Road, Suite 200  
Wauwatosa, WI 53226-3282

**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 lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and the credit needs of its assessment areas (AAs).
- A substantial majority of loan originations are made within the bank's AAs.
- The borrower distribution of home mortgage loans among borrowers of different incomes and small loans to businesses of different sizes are considered reasonable.
- The bank's community development (CD) performance through CD loans, qualified investments, and services demonstrate adequate responsiveness to CD needs in the AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

The bank's quarterly LTD ratio averages 78.89 percent over the 12 quarters starting March 31, 2020, to December 31, 2022. The bank ranks 10th in its peer group that includes 27 other similarly situated banks with LTD ratios of 50.60 percent to 94.86 percent.

### Lending in Assessment Area

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

The bank originated and purchased 89.0 percent of its total loans by number and 79.1 percent of its loans by dollar amount inside the bank's AAs during the evaluation period. This analysis is performed at the bank, 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 chart 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</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>		<b>\$(000s)</b>
Home Mortgage											
2020	669	89.6	78	10.4	747	113,768	74.6	38,811	25.4	152,580	
2021	706	89.4	84	10.6	790	120,128	82.7	25,113	17.3	145,241	
<b>Subtotal</b>	<b>1,375</b>	<b>89.5</b>	<b>162</b>	<b>10.5</b>	<b>1,537</b>	<b>233,896</b>	<b>78.5</b>	<b>63,925</b>	<b>21.5</b>	<b>297,821</b>	
Small Business											
2020-2021	100	83.3	20	16.7	120	20,842	86.1	3,359	13.9	24,201	
<b>Subtotal</b>	<b>100</b>	<b>83.3</b>	<b>20</b>	<b>16.7</b>	<b>120</b>	<b>20,842</b>	<b>86.1</b>	<b>3,359</b>	<b>13.9</b>	<b>24,201</b>	
<b>Total</b>	<b>1,475</b>	<b>89.0</b>	<b>182</b>	<b>11.0</b>	<b>1,657</b>	<b>254,738</b>	<b>79.1</b>	<b>67,284</b>	<b>20.9</b>	<b>322,022</b>	
<i>Source: Bank Data</i>											
<i>Due to rounding, totals may not equal 100.0%</i>											

## Description of Institution

Prevail Bank (Prevail) is an intrastate federally chartered institution headquartered in Medford, Wisconsin. As of December 31, 2022, Prevail had \$931.7 million in total assets and tier 1 capital of \$122.4 million. On August 23, 2022, Prevail was reorganized from a federal mutual savings bank to a federal stock savings bank. The reorganization was approved by Prevail's board of directors, the OCC, and the Federal Reserve Board. Prevail is now owned by the new holding company, Prevail Mutual Holdings Inc., a single bank holding company. The reorganization provides Prevail Bank more growth capabilities and opportunities. No corporate mergers, acquisitions, branch openings, or branch closings occurred since the last CRA evaluation.

Prevail has nine full-service branches located in Medford, Baraboo, Eau Claire, Marshfield, Owen, Phillips, Stevens Point, Wausau, and Wisconsin Rapids, Wisconsin. Automated teller machines (ATMs) are located at four of the branches, and interactive teller machines (ITMs) are located at the other five branch locations. The ATMs at the Eau Claire, Marshfield, and Owen Branch locations are new since the prior Performance Evaluation (PE). The new Owen ATM is currently the only bank operated ATM in Owen, Wisconsin.

Prevail's business strategy is to serve its customer base by offering residential real estate and commercial loan products. Historically, Prevail focused on residential real estate lending and recently shifted its strategic initiatives to expand commercial lending. This strategy provides a more full-service bank to the communities served and balanced array of traditional banking products.

The bank offers traditional products and services. As of December 31, 2022, the loan portfolio totaled \$589.3 million representing 63.3 percent of total assets. The loan portfolio is comprised of 54.45 percent residential real estate, 43.10 percent commercial, 1.47 percent agricultural, and 0.98 percent consumer loans. In comparison, as of December 31, 2019, the loan portfolio was

comprised of 70.07 percent residential real estate, 28.37 percent commercial, 1.36 percent agricultural, and 0.20 percent consumer loans.

Competition is high due to the presence of several large financial institutions in the bank's AAs. As of the June 30, 2022, FDIC Deposit Market Share Report, Prevail ranks sixth out of 53 institutions in terms of total deposit market share within the bank's AAs. Prevail held 4.21 percent (\$757.5 million) of deposits within the AAs.

The bank also received positive consideration for its response to the COVID-19 pandemic during the evaluation period through the origination of SBA Paycheck Protection Program (PPP) loans. These loans helped stabilize small businesses and communities in the AA and statewide. The bank originated \$22.1 million in PPP loans.

Prevail received a Satisfactory rating at the prior CRA Performance Evaluation dated March 2, 2020. The evaluation was completed using the Intermediate Small Bank performance standards. There are no legal or financial factors impeding the bank's ability to meet the credit needs of its AAs.

## **Scope of the Evaluation**

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

We evaluated Prevail's performance under the Intermediate Small Bank Lending Test procedures. The evaluation period for this CRA examination is January 1, 2020, through December 31, 2021. The Lending Test assesses the bank's record of meeting the credit needs of its AAs through lending activities. We reviewed data for the primary loan products, home mortgage loans and commercial loans, to evaluate the bank's lending performance.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

Examiners placed more weight on the bank's performance in the non-MSA AA because it represents the majority of the bank's deposits, loan originations and purchases, and branches during the evaluation period.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **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 (or any affiliate whose loans have been considered as part of the institution’s lending performance) 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<sup>1</sup>:** Satisfactory.

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The LTD ratio is more than reasonable given the bank's size, financial condition, and the credit needs of its AAs.
- A substantial majority of loan originations are made within the bank's AA.
- The bank exhibits reasonable geographic distribution of loans in the AA.
- The bank's CD performance through CD loans, qualified investments, and services demonstrates adequate responsiveness to CD needs in the AAs.

### Description of Institution's Operations in the State of Wisconsin

Prevail has three AAs located in the State of Wisconsin. The AAs include the Eau Claire, Wisconsin MSA AA, the non-MSA AA, and Wausau-Weston, Wisconsin MSA AA. A full-scope review was completed for the non-MSA AA and Wausau-Weston MSA AA. A limited-scope review was completed for the Eau Claire MSA AA.

The Eau Claire MSA AA consists of Chippewa and Eau Claire Counties. The non-MSA AA consists of Clark, Portage, Price, Sauk, Taylor, and Wood Counties. Portage and Sauk County were added to the non-MSA AA since the previous evaluation. Prevail acquired branches in Portage and Sauk counties in 2019 from the merger with state-chartered River Cities Bank. These counties were not included in the prior CRA evaluation given the proximity of the acquisition date and prior evaluation period end date. The Wausau-Weston MSA AA includes Lincoln and Marathon Counties.

#### Eau Claire MSA AA

The Eau Claire MSA AA consists of Chippewa and Eau Claire Counties. Prevail operates one branch in the city of Eau Claire. The Eau Claire MSA AA includes 31 census tracts (CTs). There are no low-income CTs, 6 moderate-income CTs, 22 middle-income CTs, and 3 upper-income CTs. The branch is in a middle-income CT. The branch had a new ATM installed on the premises during the assessment.

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

The Eau Claire MSA AA accounted for approximately 0.54 percent of Prevail’s total deposits according to the June 30, 2022, FDIC Deposit Market Share Report. Prevail ranks 21<sup>st</sup> out of 22 deposit-taking institutions with 0.11 percent of the deposit market share.

Employment and Economic Factors

The main industries are health care, manufacturing, education, agriculture, and finance. Major employers are Mayo Clinic Health System, Menards, United Health Care, Philips Medisize, and the University of Wisconsin – Eau Claire. The economy is stable in the Eau Claire area. The local housing market continues to be in short supply, with new construction being sold quickly in new developments.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Prevail Eau Claire MSA AA 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)	31	0.0	19.4	71.0	9.7	0.0
Population by Geography	164,490	0.0	16.6	70.9	12.5	0.0
Housing Units by Geography	70,238	0.0	18.0	71.2	10.8	0.0
Owner-Occupied Units by Geography	42,702	0.0	11.4	77.3	11.3	0.0
Occupied Rental Units by Geography	22,064	0.0	28.4	60.5	11.2	0.0
Vacant Units by Geography	5,472	0.0	27.3	66.7	6.0	0.0
Businesses by Geography	10,103	0.0	18.4	70.7	10.9	0.0
Farms by Geography	731	0.0	13.0	78.1	8.9	0.0
Family Distribution by Income Level	40,100	18.6	18.5	24.2	38.7	0.0
Household Distribution by Income Level	64,766	24.3	16.3	18.3	41.1	0.0
Median Family Income MSA - 20740 Eau Claire, WI MSA		\$66,688	Median Housing Value			\$151,201
			Median Gross Rent			\$721
			Families Below Poverty Level			7.2%
<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>						

Non-MSA AA

The non-MSA AA consists of Clark, Portage, Price, Sauk, Taylor, and Wood Counties. Prevail operates seven branches in the cities of Baraboo, Marshfield, Medford, Owen, Phillips, Stevens Point, and Wisconsin Rapids. The non-MSA AA includes 64 CTs. There are no low-income CTs, 4 moderate-income CTs, 53 middle-income CTs, and 7 upper-income CTs. There are five branches located in middle-income CTs and two branches located in upper-income CTs.



An ATM/ITM is located at each branch location. New ATMs were installed at the Marshfield and Owen branch locations. The ATM at the Owen branch is currently the only bank operated ATM in Owen, Wisconsin.

According to the Federal Financial Institutions Examination Council's (FFIEC) 2021 List of Distressed and Underserved Nonmetropolitan Middle-Income Geographies, all middle-income CTs in Price County are designated as distressed due to population loss and underserved due to remote rural location.

The non-MSA AA accounted for approximately 92.02 percent of Prevail's total deposits according to the June 30, 2022, FDIC Deposit Market Share Report. Prevail ranks 3 among 34 deposit-taking institutions with 7.54 percent of the deposit market share.

Employment and Economic Factors

The non-MSA area relies heavily on seasonal tourism with its main industries including agriculture, forestry, education, and trucking. Major employers in the AA include Aspirus Healthcare and Weather Shield Manufacturing.

Community Contact

We spoke with a community contact regarding the needs of the communities being met by local financial institutions. The contact stated that inflation continues to be high in the area, as well as the nation. Employers continue to have vacancies in various positions for the tourism and restaurant industries. Small businesses are largely performing positively, but all are still recovering from the pandemic. The housing market shortage continues due to high rent prices and new homes are still under construction. The bank has employees that volunteer throughout the community, supporting organizations with their time and expertise.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Prevail Non MSA AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	64	0.0	6.3	82.8	10.9	0.0
Population by Geography	276,323	0.0	6.4	80.9	12.8	0.0
Housing Units by Geography	130,998	0.0	6.7	81.8	11.5	0.0
Owner-Occupied Units by Geography	81,994	0.0	5.0	80.9	14.1	0.0
Occupied Rental Units by Geography	31,075	0.0	11.6	80.1	8.4	0.0
Vacant Units by Geography	17,929	0.0	5.7	89.3	5.0	0.0
Businesses by Geography	16,466	0.0	5.4	81.1	13.5	0.0
Farms by Geography	1,564	0.0	2.9	87.9	9.2	0.0
Family Distribution by Income Level	72,895	17.8	19.0	23.7	39.5	0.0
Household Distribution by Income Level	113,069	22.9	16.7	19.0	41.5	0.0
Median Family Income Non-MSAs - WI		\$60,742	Median Housing Value			\$138,296
			Median Gross Rent			\$655
			Families Below Poverty Level			8.3%
<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>						

**Wausau-Weston MSA AA**

The Wausau-Weston MSA AA consists of Marathon and Lincoln Counties. Prevail operates one branch in the city of Wausau. The Wausau-Weston MSA AA includes 37 CTs. There is 1 low-income CT, 5 moderate-income CTs, 27 middle-income CTs, and four upper-income CTs. The branch is located in a moderate-income CT. The branch is full service and has an ATM on premises.

The Wausau-Weston MSA AA accounted for approximately 7.44 percent of Prevail’s total deposits according to the June 30, 2022, FDIC Deposit Market Share Report. Prevail ranks 13th among 19 deposit-taking institutions with 1.14 percent of the deposit market share.

***Employment and Economic Factors***

The main industries in the AA are agriculture, food, insurance, manufacturing, and health care. Major employers are Church Mutual Insurance, AGRA Industries, Aspirus, Marshfield Medical Center, Greencheck, UMR, and Kolbe and Kolbe. The economy is stable, and there continues to be a shortage of houses available for rental and purchasing.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Prevail Wausau-Weston MSA AA 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)	37	2.7	13.5	73.0	10.8	0.0
Population by Geography	163,463	1.8	10.9	71.4	15.8	0.0
Housing Units by Geography	75,080	1.9	11.3	72.4	14.3	0.0
Owner-Occupied Units by Geography	48,787	0.7	9.3	73.2	16.9	0.0
Occupied Rental Units by Geography	17,480	5.1	18.2	68.0	8.7	0.0
Vacant Units by Geography	8,813	2.8	8.9	76.8	11.6	0.0
Businesses by Geography	9,425	5.4	10.4	68.8	15.4	0.0
Farms by Geography	659	0.2	3.3	83.9	12.6	0.0
Family Distribution by Income Level	44,450	18.1	18.8	23.3	39.8	0.0
Household Distribution by Income Level	66,267	23.0	16.5	19.2	41.3	0.0
Median Family Income MSA - 48140 Wausau-Weston, WI MSA		\$65,079	Median Housing Value			\$143,055
			Median Gross Rent			\$680
			Families Below Poverty Level			7.0%
<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 primarily on the results of the Wausau MSA AA and the non-MSA AA since these AAs received full-scope reviews. The non-MSA AA was weighted most heavily since it had the highest portion of bank deposits and loan originations. The Eau Claire MSA AA received a limited-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

### LENDING TEST

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

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full- and limited-scope reviews, the bank's lending performance in the state of Wisconsin is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the state.

#### *Home Mortgage Loans*

Refer to table O 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 and purchases.

##### Non-MSA AA

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs and four moderate-income CTs in the bank's AA. Prevail originated 4.2 percent of home mortgage loans in moderate-income geographies. The percentage of originated loans is below both the census demographics, which indicate 5.0 percent of owner-occupied housing is in moderate-income geographies and peer lending data of 5.5 percent of home mortgage loans originated in moderate-income geographies.

##### Wausau-Weston MSA AA

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. Prevail originated 1.0 percent of home mortgage loans in low-income geographies. The percentage of originated loans is above both the census demographics, which indicate 0.7 percent of owner-occupied housing is in low-income geographies and peer lending data of 0.9 percent of home mortgage loans originated in low-income geographies. Prevail originated 7.8 percent of home mortgage loans in moderate-income geographies. The percentage of originated loans is below both the census demographics, which indicate 9.3 percent of owner-occupied housing is in moderate-income geographies and peer lending data of 9.4 percent of home mortgage loans originated in moderate-income geographies.

#### *Small Loans to Businesses*

Refer to table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

##### Non-MSA AA

The geographic distribution of small loans to businesses reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Prevail originated 11.1 percent of business loans in moderate-income geographies. The bank's lending exceeds demographic and peer levels. Demographic data indicates 5.4 percent of business in the AA are in moderate-income geographies, and aggregate peer lending shows 5.3 percent of business loans originated in the AA were in moderate-income geographies.

Wausau-Weston MSA AA

The geographic distribution of small loans to businesses reflects reasonable distribution among geographies. Prevail originated 0.0 percent of business loans in low-income geographies. The demographics indicates 5.4 percent of businesses are in low-income geographies, and aggregate peer lending data totals 4.2 percent of business loans originated in low-income geographies. Prevail originated 4.4 percent of business loans in moderate-income geographies. The bank's lending is below demographic and peer levels. Demographic data indicates 10.4 percent of business are in moderate-income geographies, and aggregate peer lending shows 8.5 percent of business loans originated were in moderate-income geographies.

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

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

*Home Mortgage Loans*

Refer to table P in the 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.

Non-MSA AA

The borrower distribution of home mortgage loans within the non-MSA AA reflects reasonable distribution among borrowers of different incomes. Prevail originated 6.6 percent of its home mortgages to low-income families. The percentage of bank loans is below the demographic data, which indicates 17.8 percent of families in the AA are low-income families. The percentage of bank loans to low-income families is above the aggregate peer lending data, which indicates 5.8 percent of peer lending within the AA was to low-income families. Prevail originated 15.3 percent of home mortgages to moderate-income families. The percentage of bank loans is below demographic data that indicates 19.0 percent of families in the AA are moderate-income. The bank's lending is below the aggregate peer lending data, which show 18.7 percent of peer lending within the AA was to moderate-income families.

Wausau-Weston MSA AA

The borrower distribution of home mortgage loans within the Wausau-Weston MSA AA reflects reasonable distribution among borrowers of different incomes. The bank originated 9.1 percent of its home mortgages to low-income families. The percentage of bank loans is below the demographic data, which shows 18.1 percent of families in the AA are low-income. The percentage of bank loans to low-income families is above the aggregate peer lending data, which show 9.0 percent of peer lending within the AA was to low-income families. Prevail originated 18.6 percent of home mortgages to moderate-income families. The percentage of bank loans is below the demographic data which shows 18.8 percent of families in the AA are moderate-income. The bank's lending is also below the aggregate peer lending data, which show 21.0 percent of peer lending within the AA was to moderate-income families.

***Small Loans to Businesses***

Refer to table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

**Non-MSA AA**

The borrower distribution of small loans to business within the non-MSA AA reflects reasonable distribution among businesses of different sizes. Prevail originated 77.8 percent of business loans in the AA to small businesses (businesses with gross annual revenues of \$1.0 million or less). The bank's lending to small businesses is below the percentage of small businesses in the AA, which totals 78.8 percent of total businesses. The percentage of bank loans to small businesses significantly exceeds aggregate peer lending data. Aggregate peer lending data indicates 58.2 percent of loans were originated to small businesses within the AA.

**Wausau-Weston MSA AA**

The borrower distribution of small loans to business within the Wausau-Weston MSA AA reflects reasonable distribution among businesses of different sizes. Prevail originated 65.2 percent of business loans in the AA to small businesses. The bank's lending to small businesses is below the percentage of small businesses in the AA, which totals 78.1 percent of total businesses. However, the percentage of bank loans to small businesses exceeds aggregate peer lending data. Aggregate peer lending data indicates 56.9 percent of loans were originated to small businesses within the AA.

**Responses to Complaints**

Prevail demonstrated adequate responsiveness to complaints. Prevail did not receive any consumer complaints related to the bank's CRA performance, nor any complaints regarding discriminatory lending practices during the evaluation period.

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

Based on a limited-scope review, the bank's performance under the Lending Test in the Eau Claire MSA AA is weaker than the bank's overall performance under the Lending Test in the full scope areas. Consideration is given to the strong competition within the Eau Claire market.

**COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Wisconsin is rated Satisfactory.

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

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified

investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AAs.

**Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Non-MSA	16	94.00	13,900	99.00
Wausau MSA AA	1	6.00	176	1.00
Eau Claire MSA	0	0	0	0

Prevail originated 17 CD loans totaling \$13.9 million during the evaluation period that benefitted the bank’s AAs.

Non-MSA AA

Prevail originated 16 loans totaling \$13.7 million during the evaluation period.

The bank originated CD loans in Price County totaling \$4.4 million which included highway construction projects and law enforcement upgrades. Price County is considered a distressed and underserved area due to the low population and rural area location with not a lot of developments occurring in the area.

Wausau MSA AA

Prevail originated one CD loan totaling \$176,000 during the evaluation period. This loan was made for a counseling center whose clients include low- and moderate-income (LMI) individuals.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Non-MSA	0	0	44	102	44	67.70	102	69.39	0	0
Wausau MSA	0	0	9	8	9	13.84	8	5.44	0	0
Eau Claire MSA	0	0	12	37	12	18.46	37	25.17	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.

### Non-MSA AA

Prevail made 44 qualifying investments totaling \$102,128 in the non-MSA AA during the evaluation period. Donations supported economic development activities and community services. Unlike previous years, financial education was not possible in 2020 due to COVID-19 restrictions. Prevail resumed financial education in 2021.

### Wausau MSA AA

Prevail made nine qualifying investments totaling \$8,132 in the Wausau MSA AA during the evaluation period. Donations supported community services. Unlike previous years, financial education was not possible in 2020 due to COVID-19 restrictions. Prevail resumed financial education in 2021 just like in other AAs.

The bank continues its \$250,000 investment with a low-income credit union located in Deval County, Florida. The credit union members meet certain low-income thresholds and offer grants and low-interest rate loans from a CD revolving loan fund.

Prevail facilitated seven grants, totaling \$42,000, for borrowers under the Down Payment Plus Program (DDP). These grants may be used for down payment and closing cost assistance and homebuyer counseling costs associated with the purchase of a home. Three DDP grants, totaling \$18,000 were for individuals purchasing homes in the Eau Claire MSA AA. Four DDP grants, totaling \$24,000 were for individuals purchasing homes in the non-MSA AA.

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



### **Extent to Which the Bank Provides Community Development Services**

The Wausau branch is in a moderate-income CT. The Phillips branch is in Price County which is distressed and underserved. Prevail has retail and lending services accessible to individuals of different income levels.

Employees provided 426 hours of community service during the evaluation period that benefitted the bank's AAs. Service hours were provided to community development organizations that provided community services to LMI individuals, provide affordable housing, and promote economic development and financial education.

- An employee serves on the board of an organization as treasurer, providing financial expertise.
- An employee served on a loan committee as a member.
- Multiple employees serve on various organizations in the AAs.
- Senior management serves as a member on a financial panel.

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

Based on a limited-scope review, the bank's performance under the CD Test in the Eau Claire MSA AA is weaker than the bank's overall performance under the CD Test in the full scope area(s). During the evaluation period the Eau Clair MSA did not originate any CD loans. Prevail facilitated three Down Payment Plus grants totaling \$18,000 for individuals in the Eau Claire MSA AA. Donations supported community services. Prevail made twelve investments totaling \$37,000 for the evaluation period.

## Appendix A: Scope of Examination

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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 MSA(s) and non-MSA(s) 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>	January 1, 2020 through December 31, 2021	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans. Community development loans, qualified investments, community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.	N/A	N/A
<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>		
Non-MSA AA	Full-scope	Counties of Clark, Portage, Sauk, Taylor, and Wood
Wausau-Weston MSA AA	Full-scope	Counties of Lincoln and Marathon
Eau Claire MSA AA	Limited-scope	Counties of Chippewa and Eau Claire

## Appendix B: Summary of MMSA and State Ratings

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	RATINGS	PREVAIL BANK	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Prevail Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Wisconsin	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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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

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### 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2020-21</b>
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	
Prevail Eau Claire MSA AA 2021	207	47,296	15.1	8,917	0.0	0.0	0.0	11.4	7.2	11.3	77.3	80.2	76.2	11.3	12.6	12.4	0.0	0.0	0.0	
Prevail Non-MSA AA 2021	760	123,956	55.3	11,362	0.0	0.0	0.0	5.0	4.2	5.5	80.9	80.0	79.4	14.1	15.8	15.0	0.0	0.0	0.0	
Prevail Wausau-Weston MSA AA 2021	408	62,645	29.7	8,182	0.7	1.0	0.9	9.3	7.8	9.4	73.2	73.3	71.3	16.9	17.9	18.4	0.0	0.0	0.0	
<b>Total</b>	<b>1,375</b>	<b>233,896</b>	<b>100.0</b>	<b>28,461</b>	<b>0.2</b>	<b>0.3</b>	<b>0.3</b>	<b>7.8</b>	<b>5.7</b>	<b>8.5</b>	<b>77.9</b>	<b>78.0</b>	<b>76.1</b>	<b>14.2</b>	<b>15.9</b>	<b>15.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2020 - 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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2020-21</b>	
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Prevail Eau Claire MSA AA 2021	207	47,296	15.1	8,917	18.6	12.6	9.0	18.5	15.0	22.0	24.2	24.6	25.0	38.7	40.6	31.7	0.0	7.2	12.3	
Prevail Non-MSA AA 2021	760	123,956	55.3	11,362	17.8	6.6	5.8	19.0	15.3	18.7	23.7	23.3	22.3	39.5	46.6	37.7	0.0	8.3	15.5	
Prevail Wausau-Weston MSA AA 2021	408	62,645	29.7	8,182	18.1	9.1	9.0	18.8	18.6	21.0	23.3	24.5	23.6	39.8	41.2	32.0	0.0	6.6	14.4	
<b>Total</b>	<b>1,375</b>	<b>233,896</b>	<b>100.0</b>	<b>28,461</b>	<b>18.1</b>	<b>8.2</b>	<b>7.7</b>	<b>18.8</b>	<b>16.2</b>	<b>20.4</b>	<b>23.7</b>	<b>23.9</b>	<b>23.5</b>	<b>39.4</b>	<b>44.1</b>	<b>34.2</b>	<b>0.0</b>	<b>7.6</b>	<b>14.1</b>	

*Source: 2015 ACS; 01/01/2020 - 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.

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Prevail Eau Claire MSA AA 2021	20	10,508	17.4	2,426	0.0	0.0	0.0	18.4	10.0	15.5	70.7	75.0	70.2	10.9	15.0	14.2	0.0	0.0	0.0
Prevail Non-MSA AA 2021	72	10,762	62.6	3,834	0.0	0.0	0.0	5.4	11.1	5.3	81.1	66.7	83.9	13.5	22.2	10.8	0.0	0.0	0.0
Prevail Wausau-Weston MSA AA 2021	23	3,611	20.0	2,811	5.4	0.0	4.2	10.4	4.4	8.5	68.8	95.6	73.2	15.4	0.0	14.1	0.0	0.0	0.0
<b>Total</b>	<b>115</b>	<b>24,881</b>	<b>100.0</b>	<b>9,071</b>	<b>1.4</b>	<b>0.0</b>	<b>1.3</b>	<b>10.3</b>	<b>9.6</b>	<b>9.0</b>	<b>75.0</b>	<b>73.9</b>	<b>76.9</b>	<b>13.3</b>	<b>16.5</b>	<b>12.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>																			

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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2020-21</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Prevail Eau Claire MSA AA 2021	20	10,508	17.4	2,426	80.1	90.0	47.5	6.0	10.0	13.9	0.0	
Prevail Non-MSA AA 2021	72	10,762	62.6	3,834	78.8	77.8	58.2	6.6	22.2	14.6	0.0	
Prevail Wausau-Weston MSA AA 2021	23	3,611	20.0	2,811	78.1	65.2	56.9	7.3	34.8	14.6	0.0	
<b>Total</b>	<b>115</b>	<b>24,881</b>	<b>100.0</b>	<b>9,071</b>	<b>79.0</b>	<b>77.4</b>	<b>55.0</b>	<b>6.6</b>	<b>22.6</b>	<b>14.4</b>	<b>0.0</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>												

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.