PUBLIC DISCLOSURE

April 6, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BMO Harris Bank N.A.
Charter Number: 14583

111 West Monroe Street
Chicago, Illinois 60603

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street
Washington, DC 20219

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding**.**

The following table indicates the performance level of BMO Harris Bank N.A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	BMO Harris Bank N.A. Performance Tests		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

The Lending Test rating is based on performance across all rating areas. The overall conclusions are a weighted average, based on deposits, of the four multi-state metropolitan statistical area (MMSA) and seven state ratings, with the Outstanding performances in the Chicago MMSA and the state of Wisconsin carrying the greatest weights.

The Investment Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.

The Service Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.

Lending in Assessment Areas

A high percentage of the bank's loans were in its assessment areas (AAs). Examiners considered the impact of the nationwide lending performed by the BMO Transportation Finance (BMOTF) line of business. Please refer to the Description of Institution section for additional information on BMOTF.

The bank originated and purchased 48.2 percent of its total loans inside the bank's AAs during the evaluation period. When excluding BMOTF loans, the percentage increases to 83.6 percent. This analysis was performed at the bank, rather than the AA, level. This percentage did not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Areas										
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000s)**				**Total $(000s)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Home Mortgage	40,190	85.7	6,732	14.3	46,922	7,369,620	64.5	4,058,119	35.5	11,427,739
Small Business	22,192	26.8	60,558	73.2	82,750	2,799,275	29.0	6,839,217	71.0	9,638,492
Small Farm	1,229	56.1	962	43.9	2,191	201,379	65.3	107,245	34.7	308,624
Total	**63,611**	**48.2**	**68,252**	**51.8**	**131,863**	**10,370,274**	**48.5**	**11,004,581**	**51.5**	**21,374,855**

Lending Inside and Outside of the Assessment Areas excluding BMOTF loans										
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000s)**				**Total $(000s)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Home Mortgage	40,190	85.7	6,732	14.3	46,922	7,369,620	64.5	4,058,119	35.5	11,427,739
Small Business	10,857	76.6	3,318	23.4	14,175	1,528,724	78.4	420,825	21.6	1,949,549
Small Farm	1,138	88.1	154	11.9	1,292	193,667	85.6	32,449	14.4	226,116
Total	**52,185**	**83.6**	**10,204**	**16.4**	**62,389**	**9,092,011**	**66.8**	**4,511,393**	**33.2**	**13,603,404**

Description of Institution

BMO Harris Bank N.A. (BHB, institution, or bank), headquartered in Chicago, Illinois, is a full-service interstate bank that is a wholly-owned subsidiary of BMO Financial Corporation (BFC). BFC is a wholly-owned subsidiary of BMO Financial Group (BFG). BFG is a highly-diversified North American based financial services provider headquartered in Toronto, Canada with $880.0 billion in assets as of January 31, 2020. BHB has one banking affiliate, BMO Harris Central N.A., which is a special purpose cash management bank, offering delivery of controlled disbursement account services for corporate customers. BHB management elected not to include any activities of this affiliate in this performance evaluation (PE).

BHB had total assets of $137.6 billion as of December 31, 2019. This included total loans and leases of $87.7 billion that were comprised of $38.0 billion (43.4 percent of loans and leases) in commercial loans, $23.2 billion in real-estate related loans (26.4 percent), $19.2 billion (21.8 percent) in other loans, $6.8 billion (7.7 percent) in individual loans, and $588 million (0.7 percent) in agricultural loans. Total tier 1 capital as of December 31, 2019 was $13.3 billion.

As of December 31, 2019, BHB had a network of 570 branch office locations and 1,582 automated teller machines (ATMs) (759 deposit-taking) in nine states that included Arizona, Florida, Illinois, Indiana, Kansas, Minnesota, Missouri, Texas, and Wisconsin. This PE contains the OCC's evaluation of BHB's performance within 33 AAs in seven states and four MMSA rating areas.

BHB received authorization to open a full-service branch in the Dallas-Plano-Irving, TX Metropolitan Statistical Area (MSA) on May 1, 2019. While BHB received a full-service branch license, this is a commercial branch opened in the existing commercial banking office in Dallas, Texas. The branch serves as a physical location, required per state of Texas regulatory rules, for the bank to accept escrow deposits from certain business types (e.g., title insurance companies). BHB does not accept retail

deposits, nor originate retail loans from this location. The OCC did not include an analysis of this MSA in this PE.

BHB closed their one branch location in the Seattle-Bellevue-Everett, WA Metropolitan Division (MD) on May 1, 2017. The OCC did not include an analysis of this MD in this PE as there was insufficient data to provide a meaningful conclusion.

BHB provides a broad range of real estate, commercial, and consumer credit products; deposit products and services; and trust, investment, and financial advisory services to personal, business, corporate, and institutional clients. The bank's personal banking products and services include checking accounts, statement savings accounts, money market accounts, and certificates of deposit; fixed and adjustable rate mortgages; credit cards; retirement accounts and investments; home equity, personal loans and lines of credit; and, auto loans. The bank's business banking products and services include business checking and savings accounts, and certificates of deposit; business loans, business real estate loans, and government loan programs; and, receivables management, payables management, payroll processing, and merchant services.

The BMOTF line of business is one of the largest commercial truck and trailer finance companies in North America. The customers served include original equipment manufacturers, dealers, for-hire and private fleets, and refuse and recycling companies throughout the nation. The equipment financed includes heavy-duty tractors and trailers, medium-duty vehicles, alternative-fuel vehicles, and waste and recycling vehicles and collection equipment. Many of these loans meet the Consolidated Report of Condition and Income (Call Report) definition of small loans to business or small loans to farms which are required to be reported under the CRA and; therefore, analyzed as such. Examiners considered the impact of this portfolio on the small loans to businesses and small loans to farms analyses in those AAs that had a significant number of these accounts.

Currently, there are no financial impediments to BHB's ability to help meet the credit needs within its communities.

The OCC assigned BHB an overall Outstanding rating in its last CRA evaluation dated April 10, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated home mortgage loans; small loans to businesses and farms; Community Development (CD) loans; qualified investments; and CD and retail services from January 1, 2017 through December 31, 2019. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business and management did not request consideration. Qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States occurred after December 31, 2019 and will be considered in the subsequent evaluation.

In most markets, BHB made few, if any, small loans to farms as farm lending is not a primary product for the bank. Some of the bank's AAs that contain more rural geographies had a sufficient quantity of small loans to farms to analyze. The OCC determined that 20 loans made within an AA was sufficient for analysis purposes. Due to the limited number of farms in low- and moderate-income geographies, small farm lending had no material impact on the Lending Test conclusion. If examiners included an

analysis of these loans in a rating area, they noted it in the narrative for the applicable rating area. Tables related to small loans to farms where the bank had no lending were removed from appendix D.

MSA boundary changes introduced in 2018, effective January 1, 2019, by the Office of Management and Budget (OMB), resulted in additional analysis under the Lending Test for only two of the bank's AAs, both in the state of Wisconsin. Examiners completed two analyses of the geographic and borrower income distribution criteria for each of the affected AAs, one with 2017 and 2018 combined data and one with stand-alone 2019 data. The "Description of Institution's Operations" section in the state of Wisconsin rating section contains details on those areas affected by these changes.

For lending performance, examiners placed more emphasis on borrower and geographic distributions than on aggregate performance. Borrower and geographic comparators cover all three years of the evaluation period where aggregate comparators included only data from 2018, which was the most recent information available at the time of the evaluation.

When there were differences in performance between loan products in a specific AA, examiners determined the overall conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount. When there were performance differences between low- and moderate-income geographies, examiners placed more emphasis on the geographic category with more lending opportunities (e.g., higher percentage of businesses or owner-occupied housing units). These weightings are described within the narrative comments of each rating area.

BHB used innovative and flexible lending programs in order to serve AA credit needs. BHB participated in over 200 programs offered by local governments, non-profit organizations, and affordable housing agencies throughout its AAs. Examples included: various state housing finance agency (HFA) programs, Home Affordable Refinance Program (HARP), Freddie Mac Home Possible Program (Home Possible), Neighborhood Home Loan Product (NHLP), Federal Housing Authority (FHA) loans, and down payment and closing cost assistance from the Federal Home Loan Bank of Chicago affordable housing and down payment plus programs (DPAs). In addition, BHB established a self-funded grant program (BHB grants) that provide up to $3,000 in down payment or closing cost assistance. The grants can be combined with a wide array of affordable mortgage products or external down payment assistance programs. These products and programs complement the bank's existing suite of products and were considered in the "Product Innovation and Flexibility" section for those AAs that had significant activity in these products.

The OCC's analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as its primary purpose. Qualified investments included investments that met the definition of CD and were made prior to the current evaluation period and were still outstanding or were made during the current evaluation period. Examiners considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount. BHB received consideration for any qualified investment activity that benefited a specific AA in the applicable state or MMSA rating area. This included investments in the broader statewide or regional area that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Broader statewide or regional activities that did not serve an AA were considered only if the bank had reasonably served the needs of its AAs.

To provide perspective regarding the relative level of qualified investments, examiners allocated a portion of the bank's tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The complexity and innovativeness of investments were typical for an institution of this size and capacity.

The OCC's review of services during the evaluation period included analyzing BHB's network of branches and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services. Examiners gave the most weight to the geographic distribution of bank branches and changes in branch locations.

The OCC focused the analysis of retail branches on the current distribution of the bank's branches in low- and moderate-income geographies. Examiners also considered branch locations in middle- or upper-income geographies that were in close proximity to a low- or moderate-income geography. Proximity ranged from across the street to two miles away. Examiners evaluated several factors to determine that these branches served individuals in these geographies. This included the likelihood that the areas surrounding the branches offered residents and businesses of the nearby low- or moderate-income geographies additional amenities or public services, such as post offices, grocery stores, strip malls, or "big box" stores. Examiners confirmed whether the locations were along major transportation routes readily accessible by car in rural areas or public transportation in urban areas. Finally, examiners reviewed maps showing significant numbers of both retail and small business customers located in low- or moderate-income geographies with either a deposit or lending relationship at a branch in a near-by middle- or upper-income geography.

BHB offered other alternative delivery systems; however, examiners did not place significant weight on these systems, as there was no data concerning the effectiveness of these systems in targeting low- and moderate-income geographies and individuals. Examiners also considered the extent and innovativeness of BHB's CD services in meeting the credit needs within its AAs.

In February 2017, BHB launched SMARTMoney Checking. This account was in response to the Consumer Financial Protection Bureau's (CFPB) request of banks to develop an account for the un- and under-banked. This no-overdraft, low-fee account was simple, transparent, and available to those with low QualiFile scores. During the evaluation period, the bank opened over 76,000 of these accounts. Fifty-four percent were opened in branches located in, or adjacent to, low- and moderate-income geographies. BHB also established the Credit Builder loan program that helped individuals begin to establish or repair credit. This was a certificate-of-deposit account secured loan that served a dual function for savings and credit establishment. At loan maturity, the borrower was awarded the full account balance plus accrued interest in addition to establishing credit that was reported to all three credit reporting agencies. During the evaluation period, BHB opened 4,579 of these accounts totaling $6.6 million. Examiners considered these products in the Retail Banking Services section for those AAs that had a significant number of account openings.

Selection of Areas for Full-Scope Review

In each state where the bank had an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA or MMSA were combined and evaluated as a single AA. Similarly, bank delineated Non-MSA AAs within the same state were combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

When determining areas for full-scope reviews, examiners considered factors such as BHB's percentage of deposits within the rating area; business strategy within a particular MMSA or state; the number of branches; the volume of reportable loans originated and purchased in each state and/or MMSA; the significance of the bank to the AA based on its deposit market share and rank; comments received from the public; and, conclusions from prior CRA evaluations. Where necessary, examiners selected multiple AAs to complete sufficient full-scope analyses to support the conclusions and ratings.

Refer to the "Scope" section under each State Rating section 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 MMSA and state ratings. The Chicago MMSA and the state of Wisconsin carried the greatest weights in the overall conclusions. These two areas represented 83.5 percent of BHB's deposits, with 62.7 percent and 20.8 percent of deposits, respectively.

Examiners based the MMSA and state ratings on performance in all the bank's AAs and were not based solely on the performance in the full-scope AAs to the exclusion of performance in the limited-scope 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 C.F.R. §25.28(c), in determining a national bank's CRA rating, the OCC considered evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans had been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consulted 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 CFPB, as applicable.

The OCC had not identified that this institution engaged in discriminatory or other illegal credit practices that required 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 concerned activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Ratings

Chicago-Naperville-Elgin, IL-IN-WI (Chicago) MMSA

CRA rating for the Chicago MMSA[1]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans, small loans to businesses, and small loans to farms were good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

- CD services were effective and responsive in addressing community needs. The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in the Chicago MMSA

The Chicago MMSA AA was comprised of four MDs. BHB delineated the entirety of the Chicago-Naperville-Arlington Heights, IL and Lake County-Kenosha County, IL-WI MDs as AAs. They also delineated as AAs the portions of the Elgin, IL and the Gary, IN MDs where BHB had branch locations. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, Federal Deposit Insurance Corporation (FDIC) summary of deposit information, BHB had almost $63.4 billion in deposits in these AAs, which represented 62.7 percent of the bank's total deposits. During the evaluation period, the bank made $4.3 billion, or 41.5 percent of its total dollar volume, of home mortgage loans, small loans to businesses, and small loans to farms in these AAs. This rating area was the bank's largest in terms of deposits held and dollar volume of loans originated or purchased.

BHB had 215 office locations and 685 ATMs, of which 366 were deposit-taking, within these AAs. The bank ranked second in deposit market share with 15.4 percent. Primary competitors included JPMorgan Chase Bank, N.A. with 342 branches and 21.3 percent market share, Bank of America, N.A. with 154

[1] This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

branches and 8.6 percent market share, and Fifth Third Bank with 229 branches and 5.8 percent market share. There were 168 additional FDIC-insured depository institutions with 1,633 offices within the bank's AAs.

The following table provides a summary of the demographics, including housing and business information for the Chicago MMSA AA.

Table A – Demographic Information of the Assessment Area **Assessment Area: Chicago MMSA**						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	2,182	14.2	23.7	29.2	31.8	1.0
Population by Geography	9,382,158	9.8	23.3	32.1	34.5	0.2
Housing Units by Geography	3,741,525	10.2	22.3	32.1	35.0	0.3
Owner-Occupied Units by Geography	2,194,473	4.5	17.6	35.5	42.3	0.1
Occupied Rental Units by Geography	1,199,360	17.3	29.5	27.5	25.1	0.6
Vacant Units by Geography	347,692	22.2	27.9	25.9	23.6	0.4
Businesses by Geography	640,937	4.9	15.3	30.2	49.1	0.4
Farms by Geography	10,799	3.3	14.0	40.3	42.4	0.1
Family Distribution by Income Level	2,238,726	23.4	16.4	18.7	41.5	0.0
Household Distribution by Income Level	3,393,833	25.3	15.3	17.0	42.4	0.0
Median Family Income MD - 16984 Chicago-Naperville-Evanston, IL		$75,024	Median Housing Value			$237,596
Median Family Income MD - 20994 Elgin, IL		$80,899	Median Gross Rent			$1,037
Median Family Income MD - 23844 Gary, IN		$64,075	Families Below Poverty Level			10.6%
Median Family Income MD - 29404 Lake County-Kenosha County, IL-WI		$87,137				
Source: 2015 ACS Census and 2019 D&B Data *Due to rounding, totals may not equal 100.0* *(*) The NA category consists of geographies that have not been assigned an income classification.*						

Information from Moody's Analytics indicated the Chicago MMSA AA had a well-diversified economy. Key sectors of the economy based on percentage of total employment included Professional and Business Services, Education and Health Services, Government, and Leisure and Hospitality Services. Major employers in the AA included Advocate Health Care System, the University of Chicago, Abbott Laboratories, JPMorgan Chase & Co., Northwestern Memorial Healthcare, and Amazon. According to the Bureau of Labor Statistics (BLS), the annual average unemployment rate in the Chicago MMSA AA was 4.8 percent in 2017, 4.0 percent in 2018, and 3.8 percent in 2019. This was consistent with the overall Illinois state unemployment rates of 4.9 percent, 4.3 percent, and 4.0 percent, respectively, but higher than the Wisconsin state unemployment rates of 3.3 percent, 3.0 percent, and 3.1 percent respectively, and Indiana state rates of 3.6 percent, 3.5 percent, and 3.3 percent, respectively.

Based on information in the above table, low-income families earned between $32,038 and $43,569 and moderate-income families earned between $51,260 and $69,710, depending on the MD. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum

monthly mortgage payment between $801 and $1,089 for low-income borrowers and between $1,282 and $1,773 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $1,275. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The region continued to be impacted by state and local budgetary pressures, along with above average crime rates, which had an impact on population growth. The area experienced an outflow of population over the evaluation period, which worsened more than expected. This also impacted job growth. Illinois continues to experience a high level of foreclosures, with the third highest level among the 50 states. Two of the top five counties for foreclosures in Illinois were in the Chicago MMSA AA. In addition, although home values had rebounded in recent years overall, many areas continued to see home values struggling to bounce back, specifically homes located in low- and moderate-income geographies. A study by a local university showed the home values in geographic areas south of downtown Chicago, which had a higher percentage of properties in low- and moderate-income geographies, were struggling the most. As a result, refinance and home equity loan opportunities were still limited for these areas where property values are still "underwater."

Information from 11 community contact interviews; five from economic development entities, three from affordable housing organizations, and three from local government agencies, identified the following needs within the Chicago MMSA AA:

- Financing for one-to-four family home purchases and rehabilitation, multifamily buildings with tenants using Section 8 housing vouchers, and small businesses.
- Credit builder programs and emergency savings accounts.
- Investments in Community Development Financial Institutions (CDFI) loan pools that originate loans for affordable housing or micro loans to small businesses.
- Service on CDFI boards or committees.
- Down payment and closing cost assistance programs for low- and moderate-income borrowers.
- Financial counseling and education programs including first-time homebuyers' programs.
- Foreclosure prevention programs designed to keep homeowners in their home.
- Youth employment, job training, and workforce housing programs.

The Chicago MMSA AA yielded abundant opportunities to serve the identified needs. There were numerous CD and social services organizations in the AA. Local governments had designated many areas for redevelopment and use a variety of resources to increase investments in those areas including tax increment financing (TIF) districts, empowerment zones, CD block grants, and HOME Investment Partnership Programs.

Scope of Evaluation in the Chicago MMSA

For purposes of this evaluation, examiners combined the bank's four delineated AAs into one and aggregated the data at the MMSA level for purposes of analysis and presentation. This area received a full-scope review.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. Home Mortgage Disclosure Act (HMDA) loans represented the majority of BHB's lending in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHICAGO MMSA

LENDING TEST

The bank's performance under the Lending Test in the Chicago MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Chicago MMSA AA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Chicago MMSA	15,822	11,333	62	137	27,354
Total	**15,822**	**11,333**	**62**	**137**	**27,354**

Dollar Volume of Loans ($000)					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Chicago MMSA	3,027,986	1,272,180	7,447	511,213	4,818,826
Total	**3,027,986**	**1,272,180**	**7,447**	**511,213**	**4,818,826**

BHB ranked second out of 172 depository institutions (top 1.2 percent) with a deposit market share of 15.4 percent. For home mortgage loans, BHB's market share of 2.5 percent ranked sixth out of 934 lenders (top 1.0 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 10.6 percent market share, Wells Fargo Bank, N.A. with 6.4 percent, and Guaranteed Rate, Inc. with 5.4 percent.

For small loans to businesses, BHB's market share of 1.9 percent ranked ninth out of 229 lenders (top 3.9 percent). The top three lenders were Chase Bank USA, N.A. with 25.8 percent market share, American Express National Bank with 16.8 percent market share, and Citibank, N.A. with 8.9 percent market share. The top seven small business loan lenders were institutions with large business credit card portfolios with average loan sizes of less than $25,000. BHB's average small business loan size was $103,000.

For small loans to farms, BHB's market share of 2.6 percent ranked 10th out of 37 lenders (top 27.0 percent). The top three lenders were Chase Bank USA, N.A. with 25.5 percent market share, First Midwest Bank with 16.4 percent market share, and John Deere Financial, F.S.B. with 12.6 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to Table O in the Chicago MMSA 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.

The geographic distribution of home mortgage loans was adequate. Examiners considered the impact of heavy competition among home mortgage lenders, and higher foreclosure rates and slower recovery of home values in these areas, which impacted all home mortgage lenders. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Chicago MMSA 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.

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was near-to, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table S in the Chicago MMSA 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 farms.

The geographic distribution of small loans to farms was adequate. Examiners considered the low number of farms in low- and moderate-income geographies and that small farm lending was not a primary focus for the bank. BHB did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms originated or purchased in moderate-income geographies was significantly below the percentage of farms located in those geographies but exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the Chicago MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income families. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Chicago MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good. Examiners considered the impact of significantly higher unavailable business revenue data for BMOTF loans originated during 2017 (60.1 percent) compared to 2018 (3.1 percent) and 2019 (4.9 percent). The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table T in the Chicago MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was adequate considering that small farm lending was not a primary focus for the bank. The percentage of loans to small farms originated or purchased was well below the percentage of small farms in the AA and was near-to the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, sets forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made 137 CD loans totaling over $511.2 million, which represented 6.1 percent of allocated tier 1 capital. The bank utilized complex CD loans, often in a

leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 65.2 percent of these loans funded affordable housing, 16.2 percent funded economic development activities, 13.5 percent funded community services, and 5.1 percent funded revitalization and stabilization efforts. Examiners also considered the impact of strong and increasing competition for CD loans in this AA. In 2019, BHB submitted bid proposals on six CD transactions totaling $96.9 million that were lost to other lenders.

Examples of CD loans in the AA include:

- A $21.7 million loan to finance construction of an innovative project to co-locate affordable housing with library services. The building consisted of 73 mixed-income residential units above a public library branch. The project provided 66 units of affordable housing and the library offered engagement and learning opportunities that included specialized services for learning, job searches, and community building. Sources of funding for this project included low-income housing tax credits (LIHTCs), TIF funds, Chicago Housing Authority capital, and Donation Tax Credits.

- A $11.7 million loan to construct a mixed-use property in a low-income geography with high demand for affordable housing. The property consisted of retail and 70 apartment units, 55 of which were specified for low- and moderate-income individuals that partially replaced 35 units of previously demolished Section 8 housing. Funding sources included LIHTC, Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP), Housing and Urban Development (HUD), and the City of Chicago.

- A $6.0 million loan to finance construction of a greenhouse located in a moderate-income geography that distributed produce to local retailers, restaurants, farmer’s markets, and community groups. This project supported efforts to revitalize a historic district by creating over 50 jobs.

Product Innovation and Flexibility

The institution made extensive use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 1,340 loans totaling $96.9 million among the various flexible lending products available in the Chicago MMSA AA. This included 225 Home Possible loans totaling $30.7 million, 140 FHA loans totaling $24.3 million, 180 HFA loans totaling $20.9 million, 115 NHLP loans totaling $16.6 million, 216 DPAs totaling $1.1 million, and 447 BHB Grants totaling $626,000.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Chicago MMSA AA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Chicago MMSA AA was excellent.

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)**
Full Scope:										
Chicago MMSA	211	345,684	790	353,344	1,001	100.0	699,028	100.0	45	58,709
Totals	**211**	**345,684**	**790**	**353,344**	**1,001**	**100.0**	**699,028**	**100.0**	**45**	**58,709**

* 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.

The institution had an excellent level of qualified investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 8.4 percent of tier 1 capital allocated to the AA. This did not include the 45 unfunded commitments totaling $58.7 million, an additional 0.7 percent of allocated capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments to support CD initiatives. BHB had 143 qualified investments and grants totaling $471.6 million related to affordable housing, 52 qualified investments and grants totaling $77.1 million related to economic development, 33 qualified investments and grants totaling $20.1 million for revitalization and stabilization efforts, and 773 qualified investments and grants totaling $130.2 million to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A $20.9 million investment in three general obligation bonds for the local housing authority. The authority's mission was to leverage the power of affordable, decent, safe, and stable housing to help communities thrive and low-income families increase their potential for long-term economic success. They operated three major categories of housing programs: conventional low-income housing, Section 8 programs, and other non-public rental housing. Bond proceeds financed the costs of modernizing and redeveloping various affordable housing facilities throughout the city of Chicago.

- A $21.6 million investment in a LIHTC fund, along with a $15.2 million CD loan, to acquire and rehabilitate a 230-unit housing complex. The property, located in a low-income geography, restricted all units to residents that made 60 percent or less of the area median family income.

- A $10.0 million investment in a CDFI loan fund that served non-profit corporations within the bank’s AA. The funds supported local area non-profits specializing in education, youth services, housing, and workforce development targeted to low- and moderate-income residents within the AA.

- A $3.8 million investment in a private equity fund that develops, and leases healthcare facilities located primarily in low- and moderate-income communities. The funds supported three clinics within the Chicago MMSA AA. Each location served over 3,500 senior individuals, the majority of them eligible for Medicaid assistance.

SERVICE TEST

The bank's performance under the Service Test in the Chicago MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Chicago MMSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope:													
Chicago MMSA	100.0	215	100.0	5.6	14.0	31.2	48.8	0.5	9.8	23.3	32.1	34.5	0.2
Due to rounding, totals may not equal 100.0													

The bank's distribution of branches in both low- and moderate-income geographies was below the percentage of the population living within those geographies. When considering the 48 adjacent-serving branches, 13 serving low-income geographies and 35 serving moderate-income geographies within the AA, the distribution exceeded the percentage of the population within both low- and moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 685 ATMs in the AA, of which 366 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope:							
Chicago MMSA	3	6	0	-1	-4	2	0

To the extent changes had been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened three branches, all in upper-income geographies, and closed six branches, only one of which was in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB

maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches closed on Saturdays were in areas with minimal retail business activity on the weekend. In addition, BHB opened 34,670 SMARTMoney checking accounts and 1,681 Credit Builder accounts in the Chicago MMSA AA.

Community Development Services

The institution was a leader in providing CD services. During the evaluation period, 117 bank employees conducted 274 financial education events totaling 1,174 hours in coordination with 50 different organizations. Approximately 10,200 participants attended these classes. These events included financial literacy for both adults and students, first-time homebuyer, foreclosure prevention, and housing fairs and seminars primarily targeted to low- and moderate-income individuals and families. In addition, 103 bank employees spent 6,072 hours serving in leadership roles by participating on boards and committees for 101 different CD organizations. Finally, 50 employees provided over 1,120 hours of technical expertise by providing tax preparation and legal assistance to low- and moderate-income individuals and families.

Examples of CD services in the AA include:

- A senior level bank officer sat on the board and was treasurer of the local chapter of a nationwide non-profit housing organization. The mission of the organization was to build strength, stability, and self-reliance in partnership with families in need of decent and affordable housing.

- A senior level bank employee sat on the board and was a member of the fund-raising committee of an organization that provided after-school and mentoring programs to high-school girls living or going to school in under-resourced communities. Over 98 percent of participants graduated high-school and were accepted into colleges.

- A senior level bank employee sat on the board and was a member of the executive, program, and operations committees of a certified CDFI. The CDFI was also a Small Business Administration (SBA) microlending intermediary and SBA Community Advantage lender. During 2018, the CDFI made 418 loans totaling over $3.6 million.

Kansas City, MO-KS (Kansas City) MMSA

CRA rating for the Kansas City MMSA[2]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was excellent and overall borrower distribution was good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in the Kansas City MMSA

BHB delineated a portion of the Kansas City MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just over $1.0 billion in deposits in this AA, which represented 1.0 percent of the bank's total deposits. During the evaluation period, the bank made $210.3 million or 2.0 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had 10 office locations and 14 ATMs, all of which were deposit-taking, within the AA. The bank ranked 11th in deposit market share with 1.8 percent. The top three competitors included UMB Bank, N.A. with 28 branches and 23.9 percent market share, Commerce Bank with 41 branches and 12.1 percent market share, and Bank of America, N.A. with 35 branches and 10.8 percent market share. There were 87 additional FDIC-insured depository institutions with 448 offices within the bank's AA.

The following table provides a summary of the demographics, including housing and business information for the Kansas City MMSA AA.

[2] This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Kansas City MMSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	463	16.8	22.2	29.2	27.6	4.1
Population by Geography	1,732,280	10.4	21.8	33.8	33.7	0.3
Housing Units by Geography	746,566	12.2	22.9	34.4	30.0	0.5
Owner-Occupied Units by Geography	435,668	6.6	18.0	35.5	39.7	0.2
Occupied Rental Units by Geography	242,654	17.6	30.2	34.4	17.1	0.7
Vacant Units by Geography	68,244	28.7	28.5	27.1	13.7	2.0
Businesses by Geography	134,935	7.6	18.8	32.4	39.1	2.1
Farms by Geography	3,388	5.2	16.8	36.8	40.9	0.3
Family Distribution by Income Level	433,865	21.4	17.2	20.0	41.4	0.0
Household Distribution by Income Level	678,322	23.7	16.7	17.4	42.2	0.0
Median Family Income MMSA - 28140 Kansas City, MO-KS MMSA		$72,623	Median Housing Value			$164,056
			Median Gross Rent			$858
			Families Below Poverty Level			9.3%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Information from Moody's Analytics indicated the Kansas City MMSA AA had a well-diversified economy. Key sectors of the economy based on percentage of total employment included Professional and Business Services, Education and Health Services, Government, and Retail Trade. Major employers in the AA were Cerner Corporation, HCA Midwest Health System, The University of Kansas Hospital, Saint Luke's Health System, and Ford Motor Company. According to the BLS, the annual average unemployment rate in the Kansas City MMSA AA was 3.8 percent in 2017, 3.4 percent in 2018, and 3.3 percent in 2019. This was consistent with the overall Missouri state unemployment rates of 3.8 percent, 3.2 percent, and 3.3 percent, respectively, and Kansas state unemployment rates of 3.7 percent, 3.4 percent, and 3.3 percent, respectively.

Based on information in the above table, low-income families earned less than $36,312 and moderate-income families earned less than $58,099. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $908 for low-income borrowers and $1,452 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $881.

Information from four community contact interviews; two from economic development entities, and one each from an affordable housing organization and a local government agency, identified the following needs within the Kansas City MMSA AA:

- Flexible mortgage loans for home purchase and home repair.
- Small business loans of $100,000 to $500,000, especially for start-up businesses.

- Support for job training and youth employment programs.
- Financial counseling and education programs including first-time homebuyers' programs.

The Kansas City MMSA AA offered adequate opportunities to meet the identified needs. There were a variety of CD and social service organizations. In addition, there was opportunities provided by CDFI, Small Business Investment Company (SBIC), and LIHTC funds and projects. Examiners noted seven certified CDFIs, eight HUD-approved housing counseling agencies, and three SBA Small Business Development centers serving the AA.

Scope of Evaluation in the Kansas City MMSA

Examiners conducted a full-scope review of the Kansas City MMSA AA. Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in this AA. BHB originated too few small loans to farms in this AA to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY MMSA

LENDING TEST

The bank's performance under the Lending Test in the Kansas City MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Kansas City MMSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Kansas City MMSA	824	499	1	10	1,334
Total	**824**	**499**	**1**	**10**	**1,334**

Dollar Volume of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Kansas City MMSA	141,467	68,749	102	159,438	369,756
Total	**141,467**	**68,749**	**102**	**159,438**	**369,756**

BHB ranked 11th out of 91 insured depository institutions (top 12.1 percent) with a deposit market share of 1.8 percent. For home mortgage loans, BHB's market share of 0.5 percent ranked 44th out of 570 lenders (top 7.7 percent). The top three lenders were Wells Fargo Bank, N.A. with 8.7 percent market share, Community America with 6.7 percent market share, and U.S. Bank N.A. with 3.2 percent market share.

For small loans to businesses, BHB's market share of 0.5 percent ranked 24th out of 174 lenders (top 13.8 percent). The top three lenders were American Express National Bank with 17.8 percent market share, Chase Bank USA, N.A. with 17.1 percent market share, and U.S. Bank N.A. with 10.2 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Kansas City MMSA 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.

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Kansas City MMSA 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.

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near-to, the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the Kansas City MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Kansas City MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but was near-to the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made 10 CD loans totaling over $159.4 million, which represented 117.4 percent of allocated tier 1 capital. CD loans were impactful as they provided a significant number of affordable housing in the AA. By dollar volume, 97.6 percent of these loans funded affordable housing, 1.6 percent funded revitalization and stabilization efforts, and 0.8 percent funded economic development activities.

Examples of CD loans in the AA include:

- A $34.2 million construction loan to finance the development of a 361-unit apartment project. Of the 361 units, 215 units are "naturally-occurring" affordable housing for low- and moderate-income persons as rental rates are below the Federal Financial Institutions Examination Council (FFIEC) affordable rent rate for the Kansas City MSA AA.

- A $37.3 million loan to finance the acquisition of a 360-unit garden-style apartment complex. Of the 361 units, 328 units are "naturally-occurring" affordable housing for low- and moderate-income persons as rental rates are below the FFIEC affordable rent rate for the Kansas City MSA AA.

Product Innovation and Flexibility

The institution made extensive use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 520 loans and grants totaling $30.1 million among the various flexible lending products available in the Kansas City MMSA AA. This included 212 Home Possible loans totaling $25.3 million, 21 NHLP loans totaling $2.6 million, eight FHA loans totaling $1.1 million, 189 BHB Grants totaling $264,000, and 87 DPAs totaling $435,000.

INVESTMENT TEST

The institution's performance under the Investment Test in the Kansas City MSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Kansas City MSA was excellent.

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)
Full Scope:										
Kansas City MSA	15	5,078	46	4,496	61	100.0	9,574	100.0	3	3,169
Total	**15**	**5,078**	**46**	**4,496**	**61**	**100.0**	**9,574**	**100.0**	**3**	**3,169**

* 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.

BHB had an excellent level of qualified investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 7.1 percent of tier 1 capital allocated to the AA. This did not include three unfunded commitments which totaled almost $3.2 million and represented an additional 2.3 percent of allocated capital.

BHB exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments in LIHTC funds, SBICs, and CDFIs to support CD initiatives. BHB made nine qualified investments totaling $4.1 million for affordable housing, two investments totaling $2.9 million for economic development, four qualified investments and grants totaling $508,000 dollars in revitalization and stabilization activities, and 46 qualified investments and grants totaling $2.1 million dollars to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A $2.9 million investment in a LIHTC fund to acquire and rehabilitate an affordable housing complex in the AA. The investment provided a new roof and doors, updated safety and security features, and converted units to Americans with Disability Act requirements. Financing also included other tax credits and bonds from the state finance authority.

- A $1.8 million investment in an SBIC fund for economic development purposes. The fund provided subordinated debt with non-control equity investments to two small businesses in the AA that allowed for expansion and job creation.

SERVICE TEST

The bank's performance under the Service Test in the Kansas City MMSA AA is rated Outstanding.

Based on full-scope review of the bank's performance in the Kansas City MMSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope:													
Kansas City MMSA	100.0	10	100.0	0.0	10.0	40.0	50.0	0.0	10.4	21.8	33.8	33.7	0.3
Due to rounding, totals may not equal 100.0													

The bank had no branches in low-income geographies. The percentage of branches in moderate-income geographies was well below the percentage of the population in those geographies. When considering the five adjacent-serving branches, one serving low-income geographies and four serving moderate-income geographies, the distribution exceeded the percentage of the population within those geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 14 ATMs in the AA, all of which were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope:							
Kansas City MMSA	0	1	0	0	-1	0	0

To the extent changes had been made, the institution's opening and closing of branches had not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The only branch closing was in a middle-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. In addition, BHB opened 658 SMARTMoney checking accounts and 75 Credit Builder accounts in the Kansas City MMSA AA.

Community Development Services

The institution provided a significant level of CD services. During the evaluation period, one bank employee conducted 12 financial education events attended by over 491 participants. The employee presented information on buying your first home and basic consumer financial education targeted to

low- and moderate-income individuals and families. In addition, five bank employees spent 342 hours serving in leadership roles by participating on boards and committees for five different organizations.

Examples of CD services in the AA include:

- A bank employee served on the board of the local chapter of a community development organization. The organization invests in businesses, housing, and other community infrastructure to improve the economic, health, safety, and educational opportunities for the communities they serve, including low- and moderate-income geographies and persons.

- A bank manager served on the board of an early childhood education and counseling center. The center provided mental health services, occupational and speech therapy, meals, and transportation for children from low- and moderate-income families.

Minneapolis-St. Paul-Bloomington, MN-WI (Minneapolis) MMSA

CRA rating for the Minneapolis MMSA[3]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans and small loans to businesses were good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

- CD services were effective and responsive in addressing community needs. The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in the Minneapolis MMSA

BHB delineated a portion of the Minneapolis MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just under $4.1 billion in deposits in the AA, which represented 4.1 percent of the bank's total deposits. During the evaluation period, the bank made $626.1 million or 6.0 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had 26 branch office locations and 28 ATMs, of which 24 were deposit-taking, within the AA. BHB ranked fifth in deposit market share with 2.2 percent. The top three competitors included U.S. Bank N.A. with 94 branches and 39.7 percent deposit market share, Wells Fargo Bank, N.A. with 90 branches and 34.7 percent market share, and TCF National Bank with 83 branches and 3.6 percent market share. There were 118 additional FDIC-insured depository institutions with 384 offices within the bank's AA.

The following table provides a summary of the demographics, including housing and business information for the Minneapolis MMSA AA.

[3] This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Minneapolis MMSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	726	7.4	22.2	42.3	27.1	1.0
Population by Geography	3,079,031	6.2	19.6	43.2	30.6	0.3
Housing Units by Geography	1,257,426	5.8	20.4	44.4	29.1	0.3
Owner-Occupied Units by Geography	821,404	2.3	15.5	46.5	35.6	0.1
Occupied Rental Units by Geography	376,386	12.9	30.4	39.8	16.0	0.9
Vacant Units by Geography	59,636	9.7	23.6	42.9	22.9	0.8
Businesses by Geography	268,168	5.0	17.2	43.6	33.9	0.3
Farms by Geography	6,590	1.7	12.5	51.8	33.8	0.1
Family Distribution by Income Level	764,950	20.3	17.1	21.8	40.7	0.0
Household Distribution by Income Level	1,197,790	23.8	16.1	18.3	41.8	0.0
Median Family Income MMSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MMSA		$84,589	Median Housing Value			$231,190
			Median Gross Rent			$962
			Families Below Poverty Level			7.0%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Information from Moody's Analytics indicated the Minneapolis MMSA AA had a diversified economy. Key sectors of the economy based on percentage of total employment included Education and Health Services, Professional and Business Services, Government, and Manufacturing. Major employers in the AA included Allina Health System, Target Corporation, University of Minnesota, HealthPartners, Fairview Health System, and Wells Fargo & Co. According to the BLS, the annual average unemployment rate in the Minneapolis MMSA AA was 3.1 percent in 2017, 2.7 percent in 2018, and 3.0 percent in 2019. This was slightly lower than the overall Minnesota state unemployment rates of 3.4 percent, 2.9 percent, and 3.3 percent, respectively, and Wisconsin state unemployment rates of 3.3 percent, 3.0 percent, and 3.1 percent, respectively.

Based on information in the above table, low-income families earned less than $42,299 and moderate-income families earned less than $67,679. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $1,057 for low-income borrowers and $1,692 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $1,241. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from four community contact interviews; two from economic development entities and two from local government agencies, identified the following needs within the Minneapolis MMSA AA:

- Financing for business start-ups and very small-scale businesses.
- Financing and investments to nonprofit builders to increase supply of affordable housing, including affordable rental units.
- Investments in CDFIs that originate loans for affordable housing or micro loans to small businesses.
- Affordable mortgage loans for both single-family and multi-family homes.

The Minneapolis MMSA AA presented abundant opportunities to serve the identified needs. There were many CD and social services organizations within the AA for institutions to partner with, as well as a number of large, philanthropic foundations, universities, research institutes, and trade associations. The OCC noted 22 certified CDFIs, 14 HUD-approved housing counseling agencies, and three SBA Small Business Development centers serving the AA.

Scope of Evaluation in the Minneapolis MMSA

Examiners conducted a full-scope review of the Minneapolis MMSA AA. Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in this AA. BHB originated too few small loans to farms in this AA to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MINNEAPOLIS MMSA

LENDING TEST

The bank's performance under the Lending Test in the Minneapolis MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Minneapolis MMSA AA was excellent.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Minneapolis MMSA	1,636	1,335	14	33	3,018
Statewide/Regional:					
Broader MN	0	0	0	9	9
Total	**1,636**	**1,335**	**14**	**42**	**3,027**

Dollar Volume of Loans ($000)					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Minneapolis MMSA	421,247	203,529	1,318	259,765	885,859
Statewide/Regional:					
Broader MN	0	0	0	57,025	57,025
Total	**421,247**	**203,529**	**1,318**	**316,790**	**942,884**

BHB ranked fifth out of 122 insured depository institutions (top 4.1 percent) with a deposit market share of 2.2 percent. For home mortgage loans, BHB's market share of 0.5 percent ranked 46th out of 674 lenders (top 6.8 percent). The top three lenders were U.S. Bank, N.A. with 12.0 percent market share, Wells Fargo Bank, N.A. with 10.9 percent market share, and Bell Bank with 4.7 percent market share.

For small loans to businesses, BHB's market share of 0.7 percent ranked 16th out of 149 lenders (top 10.7 percent). The top three lenders were U.S. Bank, N.A. with 21.2 percent market share, American Express National Bank with 20.0 percent market share, and Wells Fargo Bank, N.A. with 15.8 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Minneapolis MMSA 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.

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near-to, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was near-to, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Minneapolis MMSA 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.

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders. When considering the impact of the BMOTF portfolio on moderate-income geographies, the bank's

performance was near-to both the percentage of business in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the Minneapolis MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was near-to, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Minneapolis MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was significantly below the percentage of small businesses in the AA and well below the aggregate percentage of all reporting lenders. When considering the impact of the BMOTF portfolio on the percentage of loans to small businesses, BHB's performance was below the percentage of small business but exceeded the aggregate percentage.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made 33 CD loans totaling almost $259.8 million, which represented 48.2 percent of allocated tier 1 capital. The bank utilized complex CD loans often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By

dollar volume, 82.8 percent of these loans funded affordable housing, 12.4 percent funded community services, 4.5 percent funded revitalization and stabilization efforts, and 0.4 percent funded economic development activities.

Examples of CD loans in the AA include:

- $54.8 million in loans to finance the construction of an affordable housing complex, which consisted of a 262-unit building for senior citizens and a 220-unit building for families. All units were available to residents that earned 60 percent or less than the AA average median income. The funding for this project was complex as it also included financing from LIHTCs and TIF funds.

- $34.5 million in loans to finance the construction of a homeless prevention and transition center, which included a 177-unit affordable housing complex. The funding for this project was complex as it included financing from new market tax credits (NMTCs), LIHTCs, TIF funds, and several other sources.

Product Innovation and Flexibility

The institution used innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 188 grants and loans totaling $16.4 million between the various flexible lending products available in the Minneapolis MMSA AA. This included 41 Home Possible loans totaling $7.1 million, 11 FHA loans totaling $2.2 million, 34 NHLP loans totaling $6.1 million, and 93 BHB Grants totaling $130,200.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Minneapolis MMSA AA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Minneapolis MMSA AA was excellent.

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)**
Full Scope:										
Minneapolis MMSA	25	30,640	73	21,086	98	89.1	51,726	93.7	12	5,592
Statewide/Regional:										
Broader MN	1	506	11	2,984	12	10.9	3,490	6.3	1	295
Total	**26**	**31,146**	**84**	**24,070**	**110**	**100.0**	**55,216**	**100.0**	**13**	**5,887**

* 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.

The institution had an excellent level of qualified investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current-

and prior-period investments represented 9.6 percent of tier 1 capital allocated to the AA. This did not include $5.6 million BHB had in 12 unfunded commitments, an additional 1.0 percent of allocated capital.

The institution exhibited good responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments to support CD initiatives. BHB had 25 qualified investments and grants totaling $24.4 million related to affordable housing, 23 qualified investments and grants totaling $25.0 million related to economic development, eight qualified investments and grants totaling $1.8 million for revitalization and stabilization efforts, and 42 grants and donations totaling $478,000 to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A $5.4 million investment in a real estate equity fund that acquires and preserves existing affordable housing. The funds were to complete repairs and energy efficient updates to 529 units of affordable housing. The units were for individuals with incomes at or below 60 percent of the area median family income.

- A $1.0 million equity equivalent investment to a non-profit organization that was dedicated to empowering low-income persons to become self-reliant. The organization provided affordable housing and career-readiness services to individuals and families. Over 90 percent of their clients live below the poverty level.

Broader Statewide or Regional Area

BHB also had 12 investments totaling $3.4 million that benefited the broader statewide or regional area. Eleven related to revitalization and stabilization efforts in low- or moderate-income geographies.

SERVICE TEST

The bank's performance under the Service Test in the Minneapolis MMSA AA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Minneapolis MMSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope:													
Minneapolis MMSA	100.0	26	100.0	3.9	7.7	50.0	38.5	0.0	6.2	19.6	43.2	30.6	0.3
Due to rounding, totals may not equal 100.0													

The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies was well below, the percentage of the population living within those geographies. When considering the five adjacent-serving branches, one serving a low-income geography and four serving moderate-income geographies within the AA, the distribution exceeded the percentage of the population within both low- and moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 28 ATMs in the AA, of which 24 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope:							
Minneapolis MMSA	0	7	0	-2	-4	-1	0

To the extent changes had been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. In addition, BHB opened 2,887 SMARTMoney checking accounts and 642 Credit Builder accounts in the Minneapolis MMSA AA.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, bank employees conducted 43 financial education events totaling 305 hours in coordination with three different organizations. Approximately 560 participants attended these classes. These events focused on basic consumer financial education and housing seminars to low- and moderate-income individuals and families. In addition, 14 bank employees served in leadership roles for 15 different organizations by participating on boards and committees.

Examples of CD services in the AA include:

- A bank employee was a board member of a local CDFI. The organization's mission was to empower low-income entrepreneurs and community partners to transform their neighborhood economies from within. Services included training in accounting, finance, credit review processes, marketing, operations, and management. The organization also offered a variety of loans for small business entrepreneurs.

- A bank employee was a board member of an organization that provided emergency resources to the community to address suburban poverty. The organization focused on affordable housing, food insecurity, underemployment, transportation barriers, lack of access to quality early childhood education, and achievement gaps that persisted despite top-quality schools for low- and moderate-income individuals and families.

St. Louis, MO-IL (St. Louis) MMSA

CRA rating for the St. Louis MMSA[4]: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans and small loans to businesses were adequate.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

- CD services were effective and responsive in addressing community needs. The bank provided a significant level of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in the St. Louis MMSA

BHB delineated a portion of the St. Louis MMSA as an AA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just under $1.8 billion in deposits in this AA, which represented 1.8 percent of the bank's total deposits. During the evaluation period, the bank made $292.4 million or 2.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had 16 office locations and 20 ATMs, all of which were deposit-taking, within the AA. The bank ranked ninth in deposit market share with 2.3 percent. The top four competitors included Stifel Bank and Trust with two branches and 16.8 percent market share, Bank of America, N.A. with 45 branches and 16.2 percent market share, U.S. Bank N.A. with 92 branches and 15.11 percent market share, and Commerce Bank with 44 branches and 8.1 percent market share. There were 80 additional FDIC-insured depository institutions with 452 offices within the bank's AA.

The following table provides a summary of the demographics, including housing and business information for the St. Louis MMSA AA.

[4] This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: St. Louis MMSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	486	15.2	20.4	31.5	32.1	0.8
Population by Geography	2,182,588	10.4	19.0	34.8	35.5	0.3
Housing Units by Geography	965,904	11.9	20.2	34.8	32.8	0.3
Owner-Occupied Units by Geography	587,619	5.8	16.8	36.9	40.4	0.1
Occupied Rental Units by Geography	276,990	18.9	25.5	33.2	21.7	0.7
Vacant Units by Geography	101,295	28.5	25.5	26.5	19.1	0.3
Businesses by Geography	159,366	6.6	17.4	31.9	43.0	1.1
Farms by Geography	3,828	3.3	14.5	40.6	41.1	0.5
Family Distribution by Income Level	554,289	21.7	16.8	19.4	42.2	0.0
Household Distribution by Income Level	864,609	24.1	15.9	17.1	42.9	0.0
Median Family Income MMSA - 41180 St. Louis, MO-IL MMSA		$70,718	Median Housing Value			$171,176
			Median Gross Rent			$847
			Families Below Poverty Level			9.8%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Information from Moody's Analytics indicated the St. Louis MMSA AA had a well-diversified economy. Key sectors of the economy based on percentage of total employment included Education and Health Services, Professional and Business Services, Leisure and Hospitality Services, Government, and Retail Trade. Major employers in the AA included BJC Healthcare, Wal-Mart Stores Inc., SSM Health Care System, Washington University in St. Louis, and Boeing Defense, Space, and Security. According to the BLS, the annual average unemployment rate in the St. Louis MMSA AA was 3.8 percent in 2017, 3.4 percent in 2018, and 3.3 percent in 2019. This was consistent with the overall Missouri state unemployment rates of 3.8 percent, 3.2 percent, and 3.3 percent, respectively, and lower than the Illinois state unemployment rates of 4.9 percent, 4.3 percent, and 4.0 percent, respectively.

Based on information in the above table, low-income families earned less than $35,359 and moderate-income families earned less than $56,575. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $884 for low-income borrowers and $1,414 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be $919. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from four community contact interviews; one from an economic development entity, two from affordable housing organizations, and one from a local government agency, identified the following needs within the St. Louis MMSA AA:

- Flexible home mortgage financing for first-time homebuyers.
- Funding for acquisition and rehabilitation of affordable housing.

- Funding for start-up businesses and "young" companies.
- Financial literacy education for businesses and individuals.

The St. Louis MMSA AA offered adequate opportunities to meet the identified needs. There were a variety of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. The OCC noted eight certified CDFIs, 14 HUD-approved housing counseling agencies, and three SBA small business development centers serving the AA.

Scope of Evaluation in the St. Louis MMSA

Examiners conducted a full-scope review of the St. Louis MMSA AA. Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in this AA. BHB originated too few small loans to farms in this AA to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS MMSA

LENDING TEST

The bank's performance under the Lending Test in the St. Louis MMSA AA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the St. Louis MMSA AA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
St. Louis MMSA	751	490	1	11	1,253
Total	**751**	**490**	**1**	**11**	**1,253**

Dollar Volume of Loans ($000)					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
St. Louis MMSA	219,816	72,498	59	32,281	324,654
Total	**219,816**	**72,498**	**59**	**32,281**	**324,654**

BHB ranked ninth out of 85 insured depository institutions (top 10.6 percent) with a deposit market share of 2.3 percent. For home mortgage loans, BHB's market share of 0.3 percent ranked 72nd out of 585 lenders (top 12.3 percent). The top three lenders were Wells Fargo, N.A. with 8.5 percent market share, U.S. Bank, N.A. with 6.0 percent market share, and JPMorgan Chase Bank, N.A. with 3.6 percent market share.

For small loans to businesses, BHB's market share of 0.4 percent ranked 27th out of 153 lenders (top 17.6 percent). The top three lenders were American Express National Bank with 13.9 percent market share, JPMorgan Chase Bank, N.A. with 13.5 percent market share, and U.S. Bank, N.A. with 13.5 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the St. Louis MMSA 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.

The geographic distribution of home mortgage loans was poor. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies, was significantly below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was below, and in moderate-income geographies was well below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the St. Louis MMSA 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.

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the St. Louis MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income families. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers was below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the St. Louis MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but approximated the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made 11 CD loans totaling over $32.2 million, which represented 13.9 percent of allocated tier 1 capital. The bank utilized complex CD loans often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 76.5 percent of these loans funded economic development activities, 13.5 percent funded affordable housing, and 9.9 percent funded community services.

Examples of CD loans in the AA include:

- $17.1 million in financing for the construction of a new manufacturing and distribution facility. The new facility will create 60 new jobs over a six-year period. The borrower received several incentives due to this job creation, including a tax abatement that required wages to be 90 percent of the county average.

- $4.4 million in financing for an affordable housing project located in a low-income geography, which resulted in the construction of 87 units of affordable housing. The units were reserved for individuals earning less than 60 percent of the area median family income.

Product Innovation and Flexibility

The institution made little use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 46 loans and grants totaling $3.1 million in among the various flexible lending products available in the St. Louis MMSA AA.

INVESTMENT TEST

The institution's performance under the Investment Test in the St. Louis MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the St. Louis MMSA was excellent.

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)
Full Scope:										
St. Louis MSA	23	8,075	23	13,291	46	100.0	21,366	100.0	7	1,889
Total	**23**	**8,075**	**23**	**13,291**	**46**	**100.0**	**21,366**	**100.0**	**7**	**1,889**

* 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.

The institution had an excellent level of qualified investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.2 percent of tier 1 capital allocated to the AA. This did not include almost $1.9 million BHB had in seven unfunded commitments, an additional 0.8 percent of allocated capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments in LIHTC funds, CDFIs, and SBICs to support CD initiatives. BHB had 14 qualified investments totaling $7.6 million related to affordable housing, 21 qualified investments and grants totaling $1.5 million to community service organizations that provided needed services to low- and moderate-income individuals, five qualified investments and grants totaling $12.2 million related to economic development, and six grants totaling $47,500 for revitalization and stabilization efforts.

Examples of qualified investments in the AA include:

- A $4.6 million investment in a private equity fund that acquired an apartment complex in the AA for preservation and rehabilitation of affordable housing. The property provided 240 affordable units restricted to households with incomes of less than 80 percent of the area median income.

- A $5.0 million investment in a private equity SBIC supporting economic development. The company provided subordinated debt investments with some equity in small and mid-size companies. BHB's investment was directed to small businesses in the St. Louis MMSA AA.

SERVICE TEST

The bank's performance under the Service Test in St. Louis MMSA AA is rated High Satisfactory.

Based on full-scope review the bank's performance in the St. Louis MMSA AA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope:													
St. Louis MMSA	100.0	16	100.0	0.0	12.5	37.5	50.0	0.0	10.4	19.0	34.8	35.5	0.3
Due to rounding, totals may not equal 100.0													

The bank had no branches in low-income geographies. The percentage of branches in moderate-income geographies was below the percentage of the population in those geographies. When considering the four adjacent-serving branches, one serving low-income geographies and three serving moderate-income geographies, the distribution was below the percentage of the population in low-income geographies and exceeded the percentage of the population within moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 20 ATMs in the AA, all of which were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope:							
St. Louis MMSA	0	0	0	0	0	0	0

The bank did not have any branch openings or closings during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. In addition, BHB opened 919 SMARTMoney checking accounts and 19 Credit Builder accounts in the St. Louis MMSA AA.

Community Development Services

The institution provided a significant level of CD services. During the evaluation period, two bank employees conducted 27 financial education events attended by over 760 participants. BHB employees presented information on buying your first home and basic consumer financial education targeted to

low- and moderate-income individuals and families. In addition, four bank employees spent 158 hours serving in leadership roles by participating on boards and committees for five different organizations.

Examples of CD services in the AA include:

- A senior level bank employee served on the board of a local community development organization. The organization worked to revitalize communities and neighborhoods in greater St. Louis by providing housing development services, technical expertise for capacity building, and access to financing for affordable housing development.

- A bank employee served on the board of a local affordable housing development corporation. The organization purchased distressed single-family homes, renovated them, and then sold them back to low- and moderate-income buyers at below market prices. This improved neighborhoods by providing quality homes to stable, responsible home owners.

State Ratings

State of Arizona

CRA rating for the State of Arizona: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans and small loans to businesses were adequate.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in Arizona

BHB delineated three AAs in the state of Arizona. They included a portion of the Phoenix-Mesa-Scottsdale, AZ (Phoenix) MSA and the entire Prescott, AZ (Prescott) and Tucson, AZ (Tucson) MSAs. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had almost $4.1 billion in deposits in these AAs, which represented 3.2 percent of the bank's total deposits. During the evaluation period, the bank made $998.1 million or 9.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 50 office locations and 193 ATMs, of which 46 were deposit-taking, within these AAs. The bank ranked seventh in deposit market share with 3.2 percent. The top three competitors had 62.8 percent of the market. These competitors included JPMorgan Chase Bank, N.A. with 202 branches and 23.4 percent market share, Wells Fargo Bank, N.A. with 182 branches and 20.7 percent market share, and Bank of America, N.A. with 123 branches and 18.7 percent market share. There were 60 other FDIC-insured depository institutions with 413 offices within the bank's AAs.

Phoenix MSA

The following table provides a summary of the demographics, including housing and business information for the Phoenix MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Phoenix MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	419,998	6.2	15.9	28.4	48.9	0.5
Farms by Geography	7,681	6.1	18.0	29.4	46.2	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		$63,686	Median Housing Value			$203,811
			Median Gross Rent			$993
			Families Below Poverty Level			12.6%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

The Phoenix MSA AA consisted of Maricopa County, one of the two counties that comprise the MSA. According to the FDIC's Summary of Deposits as of June 30, 2019, BHB deposits in the AA comprised 3.4 percent of total bank deposits.

BHB operated 41 branches in the AA and had a 3.2 percent deposit market share which ranked sixth among all institutions. Competition was significant with 61 other FDIC-insured depository institutions operating 719 offices in the AA. The top four competitors included JPMorgan Chase Bank, N.A. with 155 branches and 23.1 percent market share, Wells Fargo Bank, N.A. with 136 branches and 19.8 percent market share, Bank of America, N.A. with 96 branches and 19.2 percent market share, and Western Alliance Bank with seven branches and 8.0 percent market share.

Information from Moody's Analytics indicated the Phoenix MSA AA had a diversified economy. Key sectors of the economy based on percentage of total employment included Professional and Business Services, Education and Health Services, Government, and Retail Trade. Major employers in the AA included Banner Health System, Wal-Mart Stores Inc., Wells Fargo & Co., and Arizona State University. According to the BLS, the annual average unemployment rate in the Phoenix MSA AA was 4.3 percent in 2017 and 4.2 percent in both 2018 and 2019. This was lower than the overall Arizona state unemployment rates of 4.9 percent in 2017 and 4.7 percent in both 2108 and 2019.

Based on information in the above table, low-income families earned less than $31,834 and moderate-income families earned less than $50,949. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $796 for low-income borrowers and $1,274 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional

monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,094. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from three community contact interviews; one each from an economic development entity, an affordable housing organization, and a local government agency, identified the following needs within the Phoenix MSA AA:

- Financing for affordable housing, both rental and owner-occupied.
- Workforce housing, particularly for low- and moderate-income individuals and families.
- Small business start-up loans.
- Financial education for new homebuyers and small businesses.
- Support for Individual Development Account programs.

The Phoenix MSA AA offered adequate opportunities to meet the identified needs. The OCC noted eight certified CDFIs, 12 HUD-approved housing counseling agencies, and two SBA Small Business Development centers serving the AA.

Scope of Evaluation in Arizona

The Phoenix MSA AA had the substantial majority of deposits among the three AAs with 84.0 percent. BHB was ranked sixth out of 62 depository institutions in the AA with a market share of 3.2 percent. Examiners selected this AA for analysis using full-scope procedures and weighted most heavily in the overall conclusions. Examiners analyzed the Prescott and Tucson MSA AAs using limited scope procedures. BHB did not have significant market presence in either of these MSA AAs as several large national and regional financial institutions dominate the markets. Ratings are based on the results of the area that received the full-scope review and the bank's performance in the limited-scope areas, as applicable.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in all three AAs. BHB originated too few small loans to farms in these AAs to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix MSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Phoenix MSA	2,497	1,321	10	18	3,846
Limited Scope:					
Prescott MSA	208	37	0	1	246
Tucson MSA	218	154	5	5	382
Total	**2,923**	**1,512**	**15**	**24**	**4,474**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

Dollar Volume of Loans ($000)*					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Phoenix MSA	690,833	170,084	667	126,739	988,323
Limited Scope:					
Prescott MSA	48,818	4,413	0	3,010	56,241
Tucson MSA	64,132	18,123	1,069	46,174	129,498
Total	**803,783**	**192,620**	**1,736**	**175,923**	**1,174,062**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

BHB ranked sixth out of 62 insured depository institutions (top 9.7 percent) with a deposit market share of 3.2 percent. For home mortgage loans, BHB's market share of 0.6 percent ranked 40th out of 853 lenders (top 4.6 percent). The top three lenders were Wells Fargo, N.A. with 7.8 percent market share, JPMorgan Chase Bank, N.A. with 5.2 percent market share, and U.S. Bank, N.A. with 4.9 percent market share.

For small loans to businesses, BHB's market share of 0.5 percent ranked 19th out of 195 lenders (top 9.7 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 20.1 percent market share, American Express National Bank with 16.8 percent market share, and Citibank, N.A. with 14.1 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. Examiners placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of Arizona 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.

The geographic distribution of home mortgage loans was poor. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies was well below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income

geographies was well below, and in moderate-income geographies was below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Arizona 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.

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near-to, the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Arizona 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.

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income families. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers was below, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers was near-to, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but was near-to the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made 18 CD loans totaling over $126.7 million, which represented 28.2 percent of allocated tier 1 capital. The bank utilized complex CD loans often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 50.5 percent of these loans funded affordable housing, 24.1 percent funded economic development activities, and 23.9 percent funded revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- $30.2 million in financing for a 333-unit multifamily project located on a vacant site, that created affordable housing in, and revitalization/stabilization of, a moderate-income geography. Of the 333 units, 199 units will provide affordable housing for low- and moderate-income persons at rental rates below the FFIEC affordable rent rate for the area.

- $1.4 million in financing for a 50-unit apartment complex located in a low-income geography. Forty-five of the units were set aside for residents earning 60 percent or less of the area adjusted median income. There will be Section 8 project-based vouchers for 15 of the affordable units.

Product Innovation and Flexibility

The bank used innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 103 loans and grants totaling $7.2 million in among the various flexible lending products available in the Phoenix MSA AA. This included 16 Home Possible loans totaling $2.3 million, 13 FHA loans totaling $2.8 million, eight HFA loans totaling $1.9 million, and 56 BHB Grants totaling $78,400.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in both the Prescott and Tucson MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Arizona section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Arizona is rated Outstanding.

Conclusions for Area a Full-Scope Review

Based on a full scope review, the bank's performance in the Phoenix MSA AA was excellent.

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)
Full Scope:										
Phoenix MSA	11	20,252	65	14,462	76	69.1	34,714	73.8	6	3,952
Limited Scope:										
Prescott MSA	0	0	5	535	5	4.5	535	1.1	0	0
Tucson MSA	4	2,210	19	178	23	20.9	2,388	5.1	1	559
Statewide/Regional:										
Broader AZ	4	9,323	2	100	6	5.5	9,423	20.0	1	576
Total	**19**	**31,785**	**91**	**15,275**	**110**	**100.0**	**47,060**	**100.0**	**8**	**5,087**

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
** 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.

Phoenix MSA

BHB had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 7.7 percent of tier 1 capital allocated to the AA. This did not include six unfunded commitments which totaled almost $4.0 million and represented an additional 0.9 percent of allocated capital.

BHB exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments in LIHTC funds, SBICs, and CDFIs to support CD initiatives. BHB made 17 qualified investments and grants totaling $15.8 million for affordable housing, seven investments and grants totaling $16.8 million for economic development, four qualified investments and grants totaling $1.6 million in revitalization and stabilization activities, and 48 grants totaling $472,000 dollars to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- An investment of $3.0 million in a multi-investor LIHTC fund, which acquired interest in an affordable and public housing project in the AA that provides 228 affordable housing units and accepts Section 8 Housing Choice Vouchers.

- A $5.0 million investment in an SBIC which provided investments in companies operating in low- and moderate-income areas or that employ a majority of low- and moderate-income individuals. The SBIC's goal is to arrange impact-based investments by working with company leaders to create plans for long term sustainable improvements and job growth, focusing on creating high quality jobs.

Broader Statewide or Regional Area

BHB had over $9.4 million in six investments that benefited the broader statewide or regional area. Three of these investments were for affordable housing, two were for community services, and one was for stabilization and revitalization activities. They also had one unfunded commitment totaling $576,371 related to affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Tucson and Prescott MSAs were weaker than the bank's overall performance in the full-scope area due to a lower volume of qualified investments. The bank's performance under the Investment Test in the limited-scope areas did not have an impact on the bank's overall Investment Test rating for the state of Arizona.

SERVICE TEST

The bank's performance under the Service Test in Arizona is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Phoenix MSA AA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System*													
Assessment Area	**Deposits**	**Branches**							**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**					**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**	**Low**	**Mod**	**Mid**	**Upp**	**NA**
Full-Scope:													
Phoenix MSA	84.0	41	82.0	2.4	26.8	36.6	34.2	0.0	11.1	22.9	31.3	34.4	0.3
Limited-Scope:													
Prescott MSA	5.6	3	6.0	0.0	66.7	33.3	0.0	0.0	0.0	24.4	57.2	18.4	0.0
Tucson MSA	10.3	6	12.0	0.0	33.3	33.3	33.3	0.0	9.1	27.1	31.2	32.1	0.0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
Due to rounding, totals may not equal 100.0

The bank's distribution of branches in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. When considering the two adjacent-serving branches serving low-income geographies, the distribution was

below the percentage of the population within low-income geographies. BHB also had nine adjacent-serving branches near moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 185 ATMs in the AA, of which 38 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Full-Scope:							
Phoenix MSA	0	0	0	0	0	0	0
Limited-Scope:							
Prescott MSA	0	0	0	0	0	0	0
Tucson MSA	0	0	0	0	0	0	0
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							

The bank did not open or close any branches in the Phoenix MSA AA during this evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. In addition, BHB opened 3,190 SMARTMoney checking accounts and 310 Credit Builder in the Phoenix MSA AA.

Community Development Services

The institution provided a significant level of CD services in this AA. During the evaluation period, seven bank employees conducted 14 financial education events totaling 71 hours in coordination with four different organizations. Approximately 1,600 participants attended these classes. These events included financial literacy for students, first-time homebuyer, and housing fairs and seminars primarily targeted to low- and moderate-income individuals and families. In addition, six bank employees spent 207 hours serving in leadership roles by participating on boards and committees for six different CD organizations.

Examples of CD services in the AA include:

- A bank employee was the chairman of the board of a non-profit organization that provided education, health and wellness, and career development programs to children, predominately those from low- and moderate-income families.

- A branch manager served on the board of a local area food bank and resource center. The center provided food, referral information, and financial assistance to individuals and families in need, including senior citizens and the homeless.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Prescott MSA was consistent with the bank's overall performance under the Service Test in the full-scope area. The performance in the Tucson MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope area due to poorer branch distributions. Performance in limited-scope reviews had a neutral impact on the Service Test rating for the state of Arizona.

State of Florida

CRA rating for the State of Florida: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: High Satisfactory
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans and small loans to businesses were good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made a significant level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in Florida

BHB delineated six AAs in the state of Florida. They included the entire North Port-Sarasota-Bradenton, FL (Sarasota); Cape Coral-Ft. Myers, FL (Cape Coral); Naples-Immokalee-Marco Island, FL (Naples); and Punta Gorda, FL (Punta Gorda) MSAs; the entire West Palm Beach, FL (West Palm Beach) MD; and, one county in the Tampa-St. Petersburg-Clearwater, FL (Tampa) MSA. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just under $1.2 billion in deposits in these AAs, which represented 1.2 percent of the bank's total deposits. During the evaluation period, the bank made $512.4 million or 4.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 18 office locations and 29 ATMs, of which 23 were deposit-taking, within these AAs. The bank ranked 25th in deposit market share with 0.8 percent. The top four competitors had 49.4 percent of the market and included Bank of America, N.A. with 160 branches and 17.8 percent market share, Wells Fargo Bank, N.A. with 164 branches and 15.5 percent market share, SunTrust Bank with 121 branches and 8.3 percent market share, and JPMorgan Chase Bank, N.A. with 131 branches with 7.8 percent market share. There were 86 additional FDIC-insured depository institutions with 762 offices within the bank's AAs.

BHB did not have any branch locations in the West Palm Beach, FL MD. There was at least one deposit-taking ATM in the MD, which required its inclusion in the analysis.

The bank's business strategy in the state of Florida was focused on wealth management and not standard retail bank operations. As a result, BHB had limited branch presence and retail product delivery in most of its Florida AAs, which examiners took into consideration when determining conclusions.

Sarasota MSA

The following table provides a summary of the demographics, including housing and business information for the Sarasota MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Sarasota MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	174	2.3	24.7	45.4	26.4	1.1
Population by Geography	735,767	2.8	23.7	47.5	26.0	0.0
Housing Units by Geography	407,196	1.8	22.5	47.5	28.2	0.0
Owner-Occupied Units by Geography	221,993	1.0	18.3	50.7	29.9	0.0
Occupied Rental Units by Geography	87,917	4.5	33.8	43.7	18.1	0.0
Vacant Units by Geography	97,286	1.2	21.6	43.5	33.7	0.0
Businesses by Geography	100,923	1.3	19.3	44.8	34.6	0.0
Farms by Geography	2,970	2.1	19.4	45.1	33.4	0.0
Family Distribution by Income Level	194,874	19.4	19.1	21.0	40.5	0.0
Household Distribution by Income Level	309,910	23.1	17.1	18.1	41.7	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		$62,814	Median Housing Value			$210,725
			Median Gross Rent			$1,020
			Families Below Poverty Level			8.4%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

The Sarasota MSA AA consisted of the two counties that comprise the MSA in its entirety: Manatee and Sarasota counties. According to the FDIC's Summary of Deposits as of June 30, 2019, BHB deposits in the AA comprised 0.7 percent of total bank deposits.

BHB operated 10 branches in the AA and had just under 3.3 percent deposit market share which ranked eighth among all institutions. Competition was significant with 35 other FDIC-insured depository institutions operating 255 offices in the AA. The top four competitors had over 51.7 percent of the market and included Bank of America, N.A. with 29 branches and 19.9 percent market share, Wells Fargo Bank, N.A. with 29 branches and 13.9 percent market share, SunTrust Bank with 29 branches and 10.5 percent market share, and JPMorgan Chase Bank N.A with 24 branches and 7.4 percent market share.

Information from Moody's Analytics indicated the Sarasota MSA AA had a moderately-diversified economy. Key sectors of the economy based on percentage of total employment included Education and Health Services, Professional and Business Services, Retail Trade, and Leisure and Hospitality Services. Major employers in the AA included Sarasota Memorial Health Care System, Publix Super Markets Inc., PGT Industries, and Beall's Inc. According to the BLS, the annual average unemployment rate in the Sarasota MSA AA was 4.0 percent in 2017, 3.4 percent in 2018, and 3.1 percent in 2019. This was consistent with the overall Florida state unemployment rates of 4.2 percent in 2017, 3.6 percent in 2108, and 3.1 percent in 2019.

Based on information in the above table, low-income families earned less than $31,407 and moderate-income families earned less than $50,252. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $785 for low-income borrowers and $1,256 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,131. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from one community contact interview with an economic development organization identified the following needs within the Sarasota MSA AA:

- Financing for affordable housing.
- Financing for small businesses and foreclosed homes.
- Financial education.

The Sarasota MSA AA presented constrained opportunities to meet the identified needs. The OCC noted one certified CDFI, two HUD-approved housing counseling agencies, and no SBA Small Business Development centers serving the AA.

Cape Coral MSA

The following table provides a summary of the demographics, including housing and business information for the Cape Coral MSA AA.

Table A – Demographic Information of the Assessment Area
Assessment Area: Cape Coral MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	4.2	25.1	35.9	33.5	1.2
Population by Geography	663,675	4.7	27.1	42.3	25.9	0.0
Housing Units by Geography	374,333	3.5	21.3	40.9	34.4	0.0
Owner-Occupied Units by Geography	174,162	2.1	18.6	44.2	35.1	0.0
Occupied Rental Units by Geography	78,125	8.5	32.9	38.0	20.5	0.0
Vacant Units by Geography	122,046	2.3	17.6	38.0	42.1	0.0
Businesses by Geography	88,180	2.6	22.5	40.1	34.5	0.2
Farms by Geography	2,801	3.2	25.5	46.6	24.6	0.0
Family Distribution by Income Level	165,635	20.7	18.5	19.7	41.1	0.0
Household Distribution by Income Level	252,287	22.6	17.2	18.8	41.4	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA		$57,627	Median Housing Value			$192,233
			Median Gross Rent			$970
			Families Below Poverty Level			11.1%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

The Cape Coral MSA AA consisted of one county in its entirety: Lee County. According to the FDIC's Summary of Deposits as of June 30, 201, BHB deposits in the AA comprised less than 0.1 percent of total bank deposits.

BHB operated one branch in the AA and had less than 0.4 percent deposit market share which ranked 24th among all institutions. Competition was extensive with 31 other FDIC-insured financial institutions operating 186 offices in the AA. The top four competitors included Wells Fargo Bank, N.A. with 28 branches and 15.4 percent market share, Bank of America, N.A. with 20 branches and 14.8 percent market share, SunTrust Bank with 16 branches and 11.9 percent market share, and Fifth Third Bank with five branches and 8.1 percent market share.

Information from Moody's Analytics indicated the Cape Coral MSA AA had a modestly-diversified economy. Key sectors of the economy based on percentage of total employment included Government, Retail Trade, Leisure and Hospitality Services, and Professional and Business Services. Major employers in the AA included Lee Memorial Health System, Publix Super Markets Inc., Wal-Mart Stores Inc., and Winn Dixie Stores Inc. According to the BLS, the annual average unemployment rate in the Cape Coral MSA AA was 4.1 percent in 2017, 3.4 percent in 2018, and 3.1 percent in 2019. This was consistent with the overall Florida state unemployment rates of 4.2 percent in 2017, 3.6 percent in 2108, and 3.1 percent in 2019.

Based on information in the above table, low-income families earned less than $28,814 and moderate-income families earned less than $46,102. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $720 for low-income borrowers and $1,153 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,032. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from two community contact interviews, one each from an affordable housing organization and an economic development corporation, identified the following needs within the Cape Coral MSA AA:

- Financing for affordable housing.
- Small dollar loans to small businesses.
- Age-friendly banking accounts.
- Financial literacy training/coaching.

The Cape Coral MSA AA presented constrained opportunities to meet the identified needs. The OCC noted no certified CDFIs, five HUD-approved housing counseling agencies, and one SBA Small Business Development center serving the AA.

Scope of Evaluation in Florida

Examiners completed a full-scope review for the Sarasota MSA AA as it had the largest percentage of deposits, 61.0 percent, and the largest percent of deposit market share, 3.0 percent, among the six AAs. As a result, this AA was the most heavily weighted when arriving at the overall conclusion. Examiners completed a full-scope review of the Cape Coral MSA AA, which had 5.3 percent of the deposits in the state with a deposit market share of less than 0.1 percent. Examiners completed limited-scope reviews

for the Naples, Punta Gorda, and Tampa MSA AAs; and the West Palm Beach MD AA. Examiners based the ratings on the results of the areas that received the full-scope review and the bank's performance in the limited-scope areas, as applicable.

In the Sarasota, Naples, and Punta Gorda MSA AAs, examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in these AAs. In the Cape Coral and Tampa MSA, and West Palm Beach MD AAs, examiners placed more emphasis on small loans to businesses versus home mortgage loans and small loans to farms in arriving at the overall conclusion. Small loans to businesses represented the majority of BHB's lending in these AAs. Only the West Palm Beach AA had enough farm loans to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Sarasota MSA AA was excellent and good in the Cape Coral MSA AA.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Sarasota MSA	530	263	7	6	806
Cape Coral MSA	140	190	8	2	340
Limited Scope:					
Naples MSA	170	92	9	1	272
Punta Gorda MSA	58	25	0	0	83
Tampa MSA	84	430	3	1	518
West Palm Beach MD	66	155	20	7	248
Statewide/Regional:					
Broader FL	0	0	0	11	11
Total	**1,048**	**1,155**	**47**	**28**	**2,278**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

Dollar Volume of Loans ($000) *					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Sarasota MSA	142,316	30,173	688	5,267	178,444
Cape Coral MSA	49,390	20,208	635	2,816	73,049
Limited Scope:					
Naples MSA	87,676	13,296	648	2,810	104,430
Punta Gorda MSA	9,014	3,798	0	0	12,812
Tampa MSA	16,800	50,953	136	2,500	70,389
West Palm Beach MD	67,710	17,679	1,293	3,650	90,332
Statewide/Regional:					
Broader FL	0	0	0	86,718	86,718
Total	**372,906**	**136,107**	**3,400**	**103,761**	**616,174**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

Sarasota MSA

BHB's lending activity in the Sarasota MSA AA reflected excellent responsiveness to AA credit needs. BHB ranked eighth out of 36 insured depository institutions (top 22.2 percent) with a deposit market share of 3.3 percent. For home mortgage loans, BHB's market share of 0.7 percent ranked 39th out of 807 lenders (top 4.8 percent). The top three lenders were Wells Fargo Bank, N.A. with 8.2 percent market share, Quicken Loans Inc. with 4.7 percent market share, and Bank of America, N.A. with 4.1 percent market share.

For small loans to businesses, BHB's market share of 0.4 percent ranked 23rd out of 149 lenders (top 15.4 percent). The top three lenders were American Express National Bank with 20.0 percent market share, Bank of America, N.A. with 14.1 percent market share, and Chase Bank USA, N.A. with 13.0 percent market share.

Cape Coral MSA

BHB's lending activity in the Cape Coral MSA AA reflected excellent responsiveness to AA credit needs. BHB ranked 24th out of 32 insured depository institutions (top 75.0 percent) with a deposit market share of 0.4 percent. For home mortgage loans, BHB's market share of 0.2 percent ranked 87th out of 800 lenders (top 10.8 percent). The top three lenders were Wells Fargo Bank, N.A. with 8.0 percent market share, Quicken Loans Inc. with 5.6 percent market share, and Suncoast Credit Union with 5.2 percent market share.

For small loans to businesses, BHB's market share of 0.4 percent ranked 25th out of 137 lenders (top 18.2 percent). The top three lenders were American Express National Bank with 19.3 percent market share, Bank of America, N.A. with 11.7 percent market share, and Chase Bank USA, N.A. with 10.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of Florida 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.

Sarasota MSA

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was well below, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

Cape Coral MSA

The geographic distribution of home mortgage loans was poor. The bank made no loans in low- income geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies was significantly below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Florida 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.

Sarasota MSA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Cape Coral MSA

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

Sarasota MSA

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income families. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

Cape Coral MSA

The distribution of home mortgage loans among individuals of different income levels was poor. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income families. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers was significantly below the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers was significantly below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

Sarasota MSA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Cape Coral MSA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Sarasota MSA

The level of CD lending was excellent. BHB made six loans totaling almost $5.3 million, which represented 5.6 percent of allocated tier 1 capital. By dollar volume, 71.5 percent of these loans funded community services and 28.5 percent funded affordable housing.

Examples of CD loans in the AA include:

- A $2.6 million loan to refinance construction costs of a medical clinic located in a moderate-income geography that specialized in care for low- and moderate-income senior citizens with chronic medical conditions.

- Two loans totaling $1.2 million for the refinancing of an 84-unit apartment complex and the renovation of 30 of the units. The complex was located in a moderate-income geography. All units were affordable with rents below the FFIEC estimated affordable rent limits for the Sarasota MSA AA.

Cape Coral MSA

The level of CD lending was excellent. BHB made two CD loans totaling over $2.8 million, which represented 34.1 percent of allocated tier 1 capital. Both loans were BHB's portions of SBA 504 loans to a local business that promoted economic development by supporting permanent job creation for low- and moderate-income individuals.

Broader Statewide or Regional Areas

BHB made 11 CD loans totaling over $86.7 million that benefited the broader statewide or regional area. Two loans provided permanent financing for 312 affordable housing units, three were for economic development, five were for providing community services to predominately low- and moderate-income individuals, and one was for revitalization and stabilization.

Product Innovation and Flexibility

The institution made little use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 20 loans or grants totaling $2.2 million among the various flexible lending products available in the Sarasota MSA AA, and none in the Cape Coral MSA AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Naples, Punta Gorda, Tampa MSA AAs, and West Palm Beach MD AA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. Weaker performance in the limited-scope AAs was due to lower percentages of small loans to businesses. Performance in limited-scope reviews had a neutral impact on the Lending Test rating for the state of Florida.

Refer to Tables O through T in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Sarasota MSA AA was excellent and poor in the Cape Coral MSA AA.

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)**
Full Scope:										
Sarasota MSA	4	3,423	30	2,300	34	33.7	5,723	45.5	2	792
Cape Coral MSA	2	95	6	29	8	7.9	124	1.0	0	0
Limited Scope:										
Naples MSA	5	366	10	260	15	14.9	626	5.0	0	0
Punta Gorda MSA	1	74	6	28	7	6.9	102	0.8	0	0
Tampa MSA	2	1,021	7	36	9	8.9	1,057	8.4	1	10
West Palm Beach MD	3	1,004	12	110	15	14.8	1,114	8.9	1	1,559
Statewide/Regional:										
Broader FL	8	3,587	5	235	13	12.9	3,822	30.4	5	2,727
Total	**25**	**9,570**	**76**	**2,998**	**101**	**100.0**	**12,568**	**100.0**	**9**	**5,088**

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
** 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.

Sarasota MSA

The institution had an excellent level of qualified investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 6.1 percent of tier 1 capital allocated to the AA. This did not include two unfunded commitments totaling $792,000, an additional 0.9 percent of allocated capital.

The institution exhibited good responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments to support CD initiatives in this AA. BHB had five qualified investments totaling $1.0 million related to affordable housing, two qualified investments totaling $3.4 million related to economic development, two grants totaling $18,333 for revitalization and stabilization efforts, and 25 qualified investments and grants totaling $1.3 million to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A qualified investment of $1 million in a LIHTC fund. This investment provided funding for the construction of a 96-unit affordable housing development.

- A qualified investment of $1.1 million to a medical clinic located in a moderate-income geography that specializes in care for low- and moderate-income senior citizens with chronic medical conditions.

Cape Coral MSA

The institution had a poor level of qualified investments and grants, but not in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 1.5 percent of tier 1 capital allocated to the AA.

The institution exhibited adequate responsiveness to credit and community economic development needs. The institution rarely used innovative or complex investments to support CD initiatives. BHB had two qualified investments totaling $94,898 related to affordable housing and six grants totaling $29,000 to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A qualified investment with an outstanding balance of $87,500 to an organization that provided affordable housing to low- and moderate-income families.

- Five grants totaling $26,500 to an organization that provided financial literacy and work-readiness programs to low- and moderate-income students.

Broader Statewide or Regional Area

BHB had over $3.8 million in 13 investments that benefited the broader statewide or regional area. Two related to affordable housing, four related to economic development, three related to revitalization and stabilization, and four related to community services to low- and moderate-income individuals. They also had five unfunded commitments totaling $2.7 million, two related to revitalization and stabilization and three related to economic development.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Tampa MSA and West Palm Beach, FL MD AAs was stronger than the bank's overall performance under the Investment Test in the full-scope areas due to higher levels of qualified investments in these AAs The bank's performance under the Investment Test in the Naples and Punta Gorda MSA AAs was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to lower levels of qualified investments in these AAs. The Investment Test performance in the limited-scope areas had a neutral impact on the Investment Test for the state of Florida.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Sarasota MSA AA was excellent and was adequate in the Cape Coral MSA AA.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the Sarasota MSA AA and accessible to geographies and individuals of different income levels in the Cape Coral MSA AA.

Distribution of Branch Delivery System*													
Assessment Area	**Deposits**	**Branches**							**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**					**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**	**Low**	**Mod**	**Mid**	**Upp**	**NA**
Full-Scope:													
Sarasota MSA	61.0	10	58.8	0.0	20.0	50.0	30.0	0.0	2.8	23.7	47.5	26.0	0.0
Cape Coral MSA	5.3	1	5.9	0.0	0.0	0.0	100.0	0.0	4.7	27.1	42.3	25.9	0.0
Limited-Scope:													
Naples MSA	20.7	2	11.8	0.0	0.0	0.0	100.0	0.0	7.2	23.5	38.0	31.3	0.0
Punta Gorda MSA	4.6	1	5.9	0.0	0.0	100.0	0.0	0.0	0.0	14.4	69.7	15.8	0.0
Tampa MSA	8.4	3	17.7	0.0	0.0	0.0	100.0	0.0	7.6	21.9	31.2	38.4	0.8
West Palm Beach MD	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	7.3	27.5	30.9	33.9	0.4

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
Due to rounding, totals may not equal 100.0

Sarasota MSA

The bank did not have any branches in low-income geographies. The distribution of branches in moderate-income geographies was near-to the percentage of the population living within those geographies. When considering the four adjacent-serving branches, one serving a low-income geography and three serving moderate-income geographies within the AA, the distribution exceeded the percentage of the population within both low- and moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 10 ATMs in the Sarasota MSA AA, all of which were deposit-taking.

Cape Coral MSA

The bank had only one branch in this AA. It was located in a middle-income geography, but within close proximity to a moderate-income geography.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers BHB had one ATM in the Cape Coral MSA AA, which was deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Full-Scope:							
Sarasota MSA	0	0	0	0	0	0	0
Cape Coral MSA	0	0	0	0	0	0	0
Limited-Scope:							
Naples MSA	0	0	0	0	0	0	0
Punta Gorda MSA	0	0	0	0	0	0	0
Tampa MSA	0	0	0	0	0	0	0
West Palm Beach MD	0	0	0	0	0	0	0
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							

The bank did not open or close any branches in the Sarasota or Cape Coral MSA AAs during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in both AAs. In addition, BHB opened 417 SMARTMoney checking accounts and 106 Credit Builder accounts in the Sarasota MSA AA. BHB opened no SMARTMoney checking accounts and two Credit Builder accounts in the Cape Coral MSA AA.

Community Development Services

Sarasota MSA

The institution provided an adequate level of CD services. During the evaluation period, one bank employee conducted a basic consumer financial education event attended by approximately 30 low- and moderate-income participants. In addition, four bank employees served in leadership roles for four different organizations in the Sarasota MSA AA by participating on boards and committees.

Examples of CD services in the AA include:

- A bank employee served on the board of directors of an organization that provided free, quality medical care and referral services to low-income and uninsured adults in the AA. The organization coordinated over 90 local volunteer physicians and community partners to serve residents with specialty physician referrals, pharmaceutical assistance, and breast health and wellness at no cost to recipients.

- A bank employee served on the board of directors of an organization that provides parenting education, mental health services, and an accredited preschool for low- and moderate-income families.

Cape Coral MSA

The institution provided an adequate level of CD services when considering the limited branch resources in this AA. Two bank employees conducted four basic consumer financial education events attended by 47 low- and moderate-income participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Naples, Punta Gorda, Tampa MSA, and West Palm Beach MD AAs was weaker than the bank's overall performance under the Service Test in the full-scope areas due to the limited branch presence in these areas. The Service Test performance in the limited-scope areas had a neutral impact on the Service Test for the state of Florida.

State of Illinois

CRA rating for the State of Illinois[5]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was adequate and the overall borrower distribution was good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in Illinois

BHB delineated one AA in the state of Illinois, which was the entire Rockford, IL (Rockford) MSA. The state rating does not include the counties in the Chicago MMSA AA or St. Louis MMSA AA that were included in the respective MMSA analyses. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just under $611.3 million in deposits in this AA, which represented 0.6 percent of the bank's total deposits. During the evaluation period, the bank made $75.3 million or 0.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had 10 office locations and 45 ATMs, of which 16 were deposit-taking, within the AA. The bank ranked fourth in deposit market share with 9.6 percent. Primary competitors included Midland States Bank with 16 branches and 15.0 percent market share, Associated Bank, N.A. with six branches and 11.7 percent market share, and JPMorgan Chase Bank, N.A. with six branches and 11.3 percent market share. There were 21 additional FDIC-insured depository institutions with 52 offices within the bank's AA.

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

Rockford MSA

The following table provides a summary of the demographics, including housing and business information for the Rockford MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Rockford MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	84	15.5	22.6	29.8	29.8	2.4
Population by Geography	344,290	10.8	19.6	31.3	38.1	0.3
Housing Units by Geography	145,688	11.4	20.0	30.8	37.2	0.6
Owner-Occupied Units by Geography	90,213	5.1	15.9	33.5	45.4	0.0
Occupied Rental Units by Geography	41,828	21.3	27.8	26.0	23.3	1.6
Vacant Units by Geography	13,647	22.2	23.2	27.0	26.0	1.6
Businesses by Geography	17,818	8.8	15.4	28.6	45.0	2.2
Farms by Geography	715	3.2	10.9	33.0	52.3	0.6
Family Distribution by Income Level	88,592	21.9	17.0	20.4	40.7	0.0
Household Distribution by Income Level	132,041	24.8	15.6	18.2	41.4	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		$60,048	Median Housing Value			$116,330
			Median Gross Rent			$756
			Families Below Poverty Level			12.3%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

The Rockford MSA AA consisted of two counties in their entirety: Boone and Winnebago. According to the FDIC's Summary of Deposits as of June 30, 2019, BHB deposits in the AA comprised 0.6 percent of total bank deposits.

Information from Moody's Analytics indicated the Rockford MSA AA did not have a well-diversified economy. Key sectors of the economy based on percent of total employment included Manufacturing (primarily durable goods), Education and Health Services, Government, and Retail Trade. Major employers in the AA included Fiat Chrysler Automobiles, MercyHealth, Swedish American Health System, OSF Healthcare, and United Parcel Service Inc. According to the BLS, the annual average unemployment rate in the Rockford MSA AA was 6.5 percent in 2017, 5.7 percent in 2018, and 5.8 percent in 2019. This was considerably higher than the overall Illinois state unemployment rates of 4.9 percent, 4.3 percent, and 4.0 percent, respectively.

Based on information in the above table, low-income families earned less than $33,024 and moderate-income families earned less than $48,039. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $751 for low-income borrowers and $1,201 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional

monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $625.

Information from three community contact interviews; one from an economic development entity and two from affordable housing organizations, identified the following needs within the Rockford MSA AA:

- Financing of home purchase, home improvement, and personal loans to low- and moderate-income individuals and neighborhoods.
- Job training and skill development for displaced workers.
- Financial education.

The Rockford MSA AA presented constrained opportunities to meet the identified needs. The OCC noted no certified CDFIs, one HUD-approved housing counseling agency, and one SBA Small Business Development center serving the AA.

Scope of Evaluation in Illinois

Examiners based the rating of the state of Illinois on the area that received a full-scope review. Examiners conducted a full-scope review of the Rockford MSA AA, which was the only AA in the state that was not part of an MMSA AA. Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in this AA. BHB originated too few small loans to farms in this AA to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Rockford MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Rockford MSA	596	162	19	8	785
Statewide/Regional:					
Broader IL	0	0	0	3	3
Total	**596**	**162**	**19**	**11**	**788**

Dollar Volume of Loans ($000)					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Rockford MSA	54,860	16,677	3,725	25,770	101,032
Statewide/Regional:					
Broader IL	0	0	0	5,435	5,435
Total	**54,860**	**16,677**	**3,725**	**31,205**	**106,467**

BHB ranked fourth out of 25 insured depository institutions (top 16.0 percent) with a deposit market share of 9.6 percent. For home mortgage loans, BHB's market share of 2.6 percent ranked 10th out of 294 lenders (top 3.4 percent). The top three lenders were U.S. Bank, N.A. with 12.6 percent market share, Blackhawk Bank with 8.4 percent market share, and Envoy Mortgage, LTD with 6.7 percent market share.

For small loans to businesses, BHB's market share of 1.4 percent ranked 15th out of 79 lenders (top 19.0 percent). The top three lenders were Chase Bank USA, N.A. with 17.2 percent market share, American Express National Bank with 13.4 percent market share, and U.S. Bank, N.A. with 9.3 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. Examiners placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of Illinois 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.

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was well below and in moderate-income geographies was below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near-to, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Illinois 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.

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below, and in moderate-income geographies exceeded, both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders, respectively.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Illinois 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.

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made eight CD loans totaling almost $25.8 million, which represented 32.1 percent of allocated tier 1 capital. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 54.3 percent of these loans funded community services and 45.7 percent funded affordable housing.

Examples of CD loans in the AA include:

- A $3.6 million loan for the acquisition of a housing apartment portfolio that consisted of four buildings and 142 units. The rents for all units were significantly below the FFIEC estimated affordable rent limits for the Rockford MSA AA and were "naturally-occurring" affordable housing.

- A $6.0 million line of credit to a not-for-profit organization that offered comprehensive addiction treatment and mental health treatment for children, teens, young adults, and adults. Over 87 percent of clients qualified for governmental or state assistance.

Broader Statewide or Regional Areas

BHB made three CD loans totaling over $5.4 million that benefited the broader statewide or regional area. One loan provided permanent financing for 110 affordable housing units. The remaining two related to economic development.

Product Innovation and Flexibility

The institution used innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 163 loans totaling $7.2 million among the various flexible lending products available in the Rockford MSA AA. This included 54 HFA loans totaling $4.3 million, 16 Home Possible loans totaling $979,027, 10 FHA loans totaling $1.3 million, 56 DPAs totaling $280,000, and 22 BHB Grants totaling $30,800.

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INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Outstanding.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Rockford MSA AA was excellent.

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)
Full Scope:										
Rockford MSA	7	6,263	36	6,435	43	72.9	12,698	89.5	2	499
Statewide/Regional:										
Broader IL	15	915	1	568	16	27.1	1,483	10.5	1	89
Total	**22**	**7,178**	**37**	**7,003**	**59**	**100.0**	**14,181**	**100.0**	**3**	**588**

* 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.

Rockford MSA

BHB had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 15.8 percent of tier 1 capital allocated to the AA. This did not include two unfunded commitments that totaled $498,610, an additional 0.6 percent of allocated capital.

BHB exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments to support CD initiatives. BHB made two qualified investments totaling almost $8.1 million for affordable housing, 38 qualified investments and grants totaling $2.7 million to community service organizations that provided needed services to low- and moderate-income individuals, two qualified investments and grants totaling $1.1 million for economic development, and one qualified investment totaling $800,000 supporting revitalization and stabilization activities.

Examples of qualified investments in the AA include:

- An investment of $4 million in an affordable housing and assisted living complex for seniors. This facility, located in a low-income geography in the AA, had 201 affordable housing units, 200 of which were Section 8 eligible.

- Five bond purchases totaling over $2.1 million in a school district with more than 58 percent of the students qualify for free or reduced lunch programs. The funds were for building improvements, reconstruction, and equipment installation to bring existing student facilities up to code.

Broader Statewide or Regional Area

BHB had almost $1.5 million in 16 investments that benefited the broader statewide or regional area. Fifteen of these investments were to organizations that provided community services to low- and moderate-income individuals and one was to an SBIC. They also had one unfunded commitment totaling $88,752 related to economic development.

SERVICE TEST

The bank’s performance under the Service Test in Illinois is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Rockford MSA AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope:													
Rockford MSA	100.0	10	100.0	20.0	0.0	20.0	40.0	20.0	10.8	19.6	31.3	38.1	0.3
Due to rounding, totals may not equal 100.0													

The bank's distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies. The bank did not have any branches in moderate-income geographies. When considering the two adjacent-serving branches, both serving a moderate-income geography within the AA, the distribution exceeded the percentage of the population in moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 45 ATMs in the AA, of which 14 were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope:							
Rockford MSA	0	1	0	0	-1	0	0

To the extent changes had been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The only branch closing was in a middle-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. In addition, BHB opened 1,697 SMARTMoney checking accounts and 153 Credit Builder accounts in the Rockford MSA AA.

Community Development Services

The institution provided an adequate level of CD services.

During the evaluation period, two bank employees conducted 24 financial education events totaling 63 hours and attended by over 165 participants. These events focused on first-time homebuyer education, basic consumer finance, housing seminars, and foreclosure prevention education to low- and moderate-

income individuals and families. In addition, two bank managers served in leadership roles for one organization by participating on the board and various committees. The organization served low- and moderate-income adults and children with intellectual and developmental disabilities and their families. Programs and services provided included skills training, money management, among others.

State of Indiana

CRA rating for the State of Indiana[6]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and overall borrower distributions of the bank's originations and purchases of home mortgage loans and small loans to businesses were good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

- CD services were effective and responsive in addressing community needs. The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Indiana

BHB delineated three AAs in the state of Indiana. They included portions of the Indianapolis-Carmel-Anderson, IN (Indianapolis) MSA; the entire Kokomo, IN (Kokomo) MSA; and three Non-MSA (Non-MSA IN) counties. The Non-MSA counties were combined as one AA for analysis and presentation. The state of Indiana rating does not include the Chicago MMSA AA counties that were included in the MMSA analysis. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just under $3.8 billion in deposits in these AAs, which represented 3.7 percent of the bank's total deposits. During the evaluation period, the bank made $464.8 million or 4.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 43 office locations and 47 ATMs, of which 45 were deposit-taking, within these AAs. The bank ranked fourth in deposit market share with 7.0 percent. The top four competitors included JPMorgan Chase Bank, N.A. with 65 branches and 20.0 percent market share, PNC Bank, N.A. with 58 branches and 13.8 percent market share, Fifth Third Bank with 38 branches and 8.2 percent market share, and The Huntington National Bank with 41 branches and 6.7 percent market share. There were 39 additional FDIC-insured depository institutions with 264 offices within the bank's AAs.

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

Indianapolis MSA

The following table provides a summary of the demographics, including housing and business information for the Indianapolis MSA AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Indianapolis MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	366	18.0	27.9	30.1	23.5	0.5
Population by Geography	1,782,244	11.7	23.5	31.1	33.3	0.3
Housing Units by Geography	759,996	13.4	25.7	30.2	30.5	0.2
Owner-Occupied Units by Geography	436,043	6.8	18.1	35.1	39.9	0.1
Occupied Rental Units by Geography	243,497	20.4	36.6	24.2	18.5	0.2
Vacant Units by Geography	80,456	28.3	33.7	21.4	16.2	0.4
Businesses by Geography	144,445	9.9	20.3	30.4	39.3	0.1
Farms by Geography	3,990	5.1	13.2	44.4	37.2	0.2
Family Distribution by Income Level	438,839	22.3	17.3	19.3	41.1	0.0
Household Distribution by Income Level	679,540	24.1	16.4	17.7	41.9	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		$66,803	Median Housing Value			$143,918
			Median Gross Rent			$830
			Families Below Poverty Level			11.0%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

The Indianapolis MSA AA consisted of seven of the 11 counties in the Indianapolis-Carmel-Anderson, IN MSA. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 2.9 percent of total bank deposits. Refer to the table in appendix A for a list of counties reviewed.

BHB operated 37 branches in the AA and had a 6.7 percent deposit market share which ranked fifth among all institutions. Competition was significant with 40 other FDIC-insured depository institutions operating 441 offices in the AA. The top three competitors included JPMorgan Chase Bank, N.A. with 65 branches and 20.6 percent market share, PNC Bank, N.A. with 55 branches and 13.9 percent market share, and Fifth Third Bank with 38 branches and 8.5 percent market share.

Information from Moody's Analytics indicated the Indianapolis MSA AA had a moderately-diversified economy. Key sectors of the economy based on percentage of total employment included Professional and Business Services, Education and Health Services, Government, and Leisure and Hospitality Services. Major employers in the AA included Indiana University Health, St. Vincent Hospitals and Health Services, Eli Lilly and Company, and Community Health Network. According to the BLS, the annual average unemployment rate in the Indianapolis MSA AA was 3.3 percent in 2017, 3.2 percent in 2018, and 3.1 percent in 2019. This was slightly lower than the overall Indiana state unemployment rates of 3.6 percent, 3.5 percent, and 3.3 percent, respectively.

Based on information in the above table, low-income families earned less than $34,402 and moderate-income families earned less than $53,443. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $835 for low-income borrowers and $1,336 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $773.

Information from one community contact interview with an economic development entity identified the following needs within the Indianapolis MSA AA:

- Affordable housing loans.
- Financing for economic development activities.
- Loans to small businesses.
- Provision of community development services.

The Indianapolis MSA AA presented ample opportunities to meet the identified needs. Numerous nonprofit organizations engage in affordable housing and economic development endeavors and provide community services targeted to low- and moderate-income persons and geographies. There were seven certified CDFIs, 10 HUD-approved housing counseling agencies, and two SBA Small Business Development centers in the AA.

Scope of Evaluation in Indiana

The Indianapolis MSA AA had the substantial majority of deposits among the three AAs with 91.9 percent. BHB was ranked fifth out of 41 depository institutions in the AA with a market share of 6.7 percent. Examiners selected this AA for analysis using full-scope procedures and weighted it most heavily in the overall conclusions. Examiners analyzes the Kokomo MSA and the Non-MSA IN AAs using limited scope procedures. Examiners based the ratings on the results of the area that received the full-scope review and the bank's performance in the limited-scope areas, as applicable.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in all three AAs. BHB originated too few small loans to farms in these AAs to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Indianapolis MSA	2,182	1,125	17	34	3,358
Limited Scope:					
Kokomo MSA	281	27	0	1	309
Non-MSA IN	81	25	1	0	107
Statewide/Regional:					
Broader IN	0	0	0	5	5
Total	**2,544**	**1,177**	**18**	**40**	**3,779**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

Dollar Volume of Loans ($000) *					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Indianapolis MSA	259,624	169,210	1,087	126,218	556,139
Limited Scope:					
Kokomo MSA	22,686	4,457	0	18,294	45,437
Non-MSA IN	5,359	2,381	23	0	7,763
Statewide/Regional:					
Broader IN	0	0	0	26,532	26,532
Total	**287,669**	**176,048**	**1,110**	**171,044**	**635,871**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

BHB ranked fifth out of 41 insured depository institutions (top 12.2 percent) with a deposit market share of 6.7 percent. For home mortgage loans, BHB's market share of 1.3 percent ranked 21st out of 584 lenders (top 3.6 percent). The top three lenders were The Huntington National Bank and Caliber Home Loans, Inc. both with 5.5 percent market share, and JPMorgan Chase Bank, N.A. with 4.8 percent market share.

For small loans to businesses, BHB's market share of 1.2 percent ranked 19th out of 144 lenders (top 13.2 percent). The top three lenders were Chase Bank USA, N.A. with 22.2 percent market share, American Express National Bank with 16.0 percent market share, and PNC Bank N.A. with 9.7 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near-to, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the state of Indiana 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.

The geographic distribution of small loans to businesses was adequate. The percentage of small loans to businesses originated or purchased in low-income geographies was near-to, and in moderate-income geographies was well below, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies exceeded, and in moderate-income geographies was well below, the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Indiana 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.

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made 34 CD loans totaling over $126.2 million, which represented 27.8 percent of allocated tier 1 capital. The bank made use of innovative or complex CD loans and involved many complex projects where the bank often acted in a leadership role. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 58.3 percent of these loans funded affordable housing, 23.1 percent funded economic development activities, 14.3 percent funded revitalization and stabilization efforts, and 4.2 percent funded community services.

Examples of CD loans in the AA include:

- Three loans totaling $28.3 million for the transformation of an old warehouse into a mixed-use property in a low-income geography. The development included 132 residential units, as well as office and retail spaces. It created 145 construction jobs and 60 long-term full-time jobs. Just over half of the residential units (68) will be set aside for residents earning 80 percent or less of the Area Median Income. Funding sources also included HTCs, TIF funds, and a grant from the City of Indianapolis.

- A $7.8 million bridge loan for the construction of a 45-unit apartment building in a low-income geography. Units will be restricted to homeless individuals and families earning up to 60 percent of the Area Median Income. Funding sources also included LIHTC, State of Indiana Housing Trust Fund, and the Indiana Housing and Community Development Authority Fund.

Broader Statewide or Regional Areas

BHB made five CD loans totaling over $26.5 million that benefited the broader statewide or regional area. Three loans provided permanent financing for 99 affordable housing units. The remaining two related to revitalization and stabilization efforts.

Product Innovation and Flexibility

The institution made extensive use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 399 loans and grants totaling $23.2 million among the various flexible lending products available in the Indianapolis MSA AA. This included 93 NHLP loans totaling $11.1 million, 47 Home Possible Loans totaling $4.5 million, 37 FHA loans totaling $5.4 million, 15 HFA loans totaling $1.8 million, 51 DPAs totaling $255,000, and 155 BHB Grants totaling $217,000.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Kokomo, IN MSA and Non-MSA IN AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Indiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the institution's performance in the Indianapolis MSA AA was excellent.

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)**
Full Scope:										
Indianapolis MSA	30	23,805	57	8,399	87	69.6	32,204	55.0	6	1,332
Limited Scope:										
Kokomo MSA	1	426	10	948	11	8.8	1,374	2.3	1	21
Non-MSA IN	0	0	2	304	2	1.6	304	0.5	0	0
Statewide/Regional:										
Broader IN	16	21,125	9	3,581	25	20.0	24,706	42.2	5	1,590
Totals	**47**	**45,356**	**78**	**13,232**	**125**	**100.0**	**58,588**	**100.0**	**12**	**2,943**

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
** 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.

Indianapolis MSA

BHB had an excellent level of qualified investments and grants. The dollar volume of current- and prior-period investments represented 7.1 percent of tier 1 capital allocated to the AA. This did not include the six unfunded commitments totaling $1.3 million, an additional 0.3 percent of allocated capital.

BHB exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments in CDFIs and LIHTC funds to support CD initiatives. BHB had 16 qualified investments and grants totaling over $24.1 million related to affordable housing, three qualified investments and grants totaling $476,696 related to economic development, two qualified investments and grants totaling $408,146 for revitalization and stabilization efforts, and 66 qualified investments and grants totaling almost $7.2 million to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- An investment of $7.5 million in a LIHTC fund that was the first of its kind comprised of housing authority sponsored LIHTC transactions. BHB's funds were allocated to two affordable housing projects for seniors, a 106-unit apartment complex in a moderate-income area and a 94-unit apartment complex in a low-income geography.

- An investment valued at $7.4 million in a mortgage-backed security for a 280-unit, multi-family apartment complex. Of these units, 226 were affordable as rents are restricted. The rent restrictions provided 84 units for tenants with income of less than 60 percent of the area median income and 142 units for tenants with income of less than 50 percent of the area median income.

Broader Statewide or Regional Area

BHB had 25 investments totaling $24.7 million that benefited the broader statewide or regional area. Nineteen investments were for community services for low- and moderate-income individuals, three for affordable housing, and three for economic development activities. There were also five unfunded commitments totaling almost $1.6 million, three related to economic development, and one related to affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Kokomo MSA AA was consistent with the bank's overall performance in the full-scope area. In the Non-MSA IN AA, the performance was weaker than the bank's overall performance in the full-scope area due to a lower volume of qualified investments. The bank's performance under the Investment Test in the limited-scope areas did not have an impact on the bank's overall Investment Test rating for the state of Indiana.

SERVICE TEST

The bank's performance under the Service Test in Indiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis MSA AA was excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full-Scope:													
Indianapolis MSA	91.9	37	86.1	5.4	35.1	27.0	32.4	0.0	11.7	23.5	31.1	33.3	0.3
Limited-Scope:													
Kokomo MSA	5.5	4	9.3	25.0	25.0	50.0	0.0	0.0	8.7	16.7	46.6	28.0	0.0
Non-MSA IN	2.6	2	4.7	0.0	50.0	50.0	0.0	0.0	3.5	27.2	59.6	9.7	0.0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
Due to rounding, totals may not equal 100.0

The bank's distribution of branches in low-income geographies was well below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. When considering the five adjacent-serving branches serving low- income geographies, the distribution exceeded the percentage of the population within low- income geographies. BHB also has three adjacent-serving branches near moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. BHB had 38 ATMs in the AA, of which 36 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full-Scope:							
Indianapolis MSA	0	1	0	0	0	-1	0
Limited-Scope:							
Kokomo MSA	0	0	0	0	0	0	0
Non-MSA IN	0	0	0	0	0	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes had been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB did not close any branches in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches closed on Saturdays were in areas with minimal retail business activity on

the weekend. In addition, BHB opened 3,777 SMARTMoney checking accounts and 353 Credit Builder accounts in the Indianapolis MSA AA.

Community Development Services

The institution was a leader in providing CD services. During the evaluation period, three bank employees conducted 29 financial education events attended by over 980 participants. BHB employees presented information on buying your first home, refinancing an existing mortgage, creating a budget, understanding and rebuilding credit, and affordable home ownership, primarily targeted to low- and moderate-income individuals and families. In addition, eight bank employees spent 584 hours serving in leadership roles by participating on boards and committees for nine different organizations.

Examples of CD services in the AA include:

- A senior bank employee served as a board member for an organization with a mission to increase affordable and sustainable housing opportunities. The organization offered affordable mortgage products, refinancing options, home repair loans and project guidance, homeownership advice and classes, and financial planning.

- A senior bank officer served as a board member for an organization that helped minorities and disadvantaged individuals achieve social and economic equality. The organization's advocacy and public policy efforts centered on education, workforce development, health and wellness, and quality of life.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Kokomo MSA and Non-MSA IN AAs was consistent with the bank's overall performance under the Service Test in the full-scope area.

State of Kansas

CRA rating for the State of Kansas[7]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans was excellent and the overall borrower distribution was good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in Kansas

BHB delineated one county in the state of Kansas (Non-MSA KS) as an AA. The state rating does not include the counties in the Kansas City MMSA AA that were included in the MMSA analysis. Refer to the table in appendix A for the county reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just under $50.0 million in deposits in this AA, which represented 0.05 percent of the bank's total deposits. During the evaluation period, the bank made almost $2.2 million or 0.02 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had a limited presence in this AA with one office location, one stand-alone drive-up facility, and three ATMs, all of which were deposit-taking. The bank ranked fifth in deposit market share with 6.6 percent. The top four competitors included GNBank N.A. with four branches and 30.6 percent market share, Community National Bank & Trust with four branches and 16.7 percent market share, Commerce Bank with two branches and 14.6 percent market share, and Labette Bank with four branches and 12.0 percent market share. There were six additional FDIC-insured depository institutions with eight offices within the bank's AA.

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

Non-MSA KS

The following table provides a summary of the demographics, including housing and business information for the Non-MSA KS AA.

Table A – Demographic Information of the Assessment Area Assessment Area: Non-MSA KS						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	11	0.0	18.2	72.7	9.1	0.0
Population by Geography	39,304	0.0	11.6	69.0	19.4	0.0
Housing Units by Geography	17,864	0.0	12.7	69.9	17.4	0.0
Owner-Occupied Units by Geography	9,203	0.0	8.8	78.8	12.4	0.0
Occupied Rental Units by Geography	5,862	0.0	16.8	57.7	25.5	0.0
Vacant Units by Geography	2,799	0.0	16.9	66.2	16.9	0.0
Businesses by Geography	2,211	0.0	24.4	59.9	15.6	0.0
Farms by Geography	168	0.0	4.8	85.7	9.5	0.0
Family Distribution by Income Level	8,729	22.2	17.3	22.9	37.6	0.0
Household Distribution by Income Level	15,065	30.7	18.9	16.2	34.3	0.0
Median Family Income Non-MSAs - KS		$57,229	Median Housing Value			$92,561
			Median Gross Rent			$656
			Families Below Poverty Level			13.0%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Based on data from the Pittsburg Area Chamber of Commerce, the Non-MSA KS AA had a moderately-diversified economy. Key sectors of the economy based on percent of total employment included Government, Trade, Transportation, and Utilities, Manufacturing, and Education and Health Services. Major employers in the AA included Pittsburg State University, Crossland Construction, Downstream Casino and Resort, and Via Christi Hospital. According to the BLS, the annual average unemployment rate in Crawford County was 4.2 percent in 2017 and 4.0 percent in both 2018 and 2019. This was higher than the overall Kansas state unemployment rates of 3.6 percent, 3.3 percent, and 3.2 percent. respectively.

Based on information in the above table, low-income families earned less than $28,615 and moderate-income families earned less than $45,784. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $715 for low-income borrowers and $1,145 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $497.

Information from one community contact interview with a local government housing and economic development agency identified the following needs within the Non-MSA KS AA:

- Affordable housing loans.
- Economic development loans.
- Community development services.
- Loans for mixed use properties (commercial on 1st floor and residential above).

The Non-MSA KS AA presented constrained opportunities to meet the identified needs. There were few non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. The OCC noted no certified CDFIs, no HUD-approved housing counseling agencies, and only one SBA Small Business Development center serving the AA.

Scope of Evaluation in Kansas

Examiners based the rating of the state of Kansas on the area that received a full-scope review. Examiners conducted a full-scope review of the Non-MSA KS AA, which was the only AA in the state that was not part of an MMSA.

Examiners emphasized home mortgage loans in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in this AA. BHB did not originate enough small loans to businesses to conduct any meaningful analysis and did not originate any small loans to farms in this AA. Examiners also considered the bank's limited branch presence and staffing in this AA when reaching conclusions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Non-MSA KS AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Non-MSA KS	23	9	0	2	34
Total	**23**	**9**	**0**	**2**	**34**

Dollar Volume of Loans ($000)					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Non-MSA KS	1,841	331	0	8,640	10,812
Total	**1,841**	**331**	**0**	**8,640**	**10,812**

BHB ranked fifth out of 11 insured depository institutions (top 45.5 percent) with a deposit market share of 6.6 percent. For home mortgage loans, BHB's market share of 1.9 percent ranked 13th out of 96 lenders (top 13.5 percent). The top three lenders were Community National Bank & Trust with 11.9 percent market share, GNBank, N.A. with 10.0 percent market share, and Labette Bank with 7.7 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. Examiner conclusions were based on the bank's performance in moderate-income geographies, as there were no low-income geographies in this AA.

Home Mortgage Loans

Refer to Table O in the state of Kansas 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.

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Kansas 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.

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. BHB made two CD loans totaling over $8.6 million, which represented 131.4 percent of allocated tier 1 capital. Both loans promoted economic development by financing the expansion of a small business that included the permanent creation of 15 jobs.

Product Innovation and Flexibility

The institution made limited use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made three loans or grants totaling $129,596 among the various flexible lending products available in the Non-MSA KS AA.

INVESTMENT TEST

The institution's performance under the Investment Test in Kansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the institution's performance in the Non-MSA KS was AA excellent.

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)
Full Scope:										
Non-MSA KS	0	0	3	404	3	37.5	404	42.8	0	0
Statewide/Regional:										
Broader KS	4	506	1	33	5	62.5	539	57.2	1	241
Total	**4**	**506**	**4**	**437**	**8**	**100.0**	**943**	**100.0**	**1**	**241**

* 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 KS

The institution had an excellent level of qualified investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 6.1 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments to support CD initiatives in this AA. BHB made one qualified investment totaling $400,000 related to economic development. The investment was in a CDFI fund that provided financial assistance to small businesses. BHB also made two grants totaling $4,000 to community service organizations that provided needed services to low- and moderate-income individuals.

Broader Statewide or Regional Area

BHB had $539,634 in five investments that benefited the broader statewide or regional area. Three qualified investments were for affordable housing, one was for economic development, and one was for community services targeted to low- and moderate-income individuals. They also had one unfunded commitment totaling $241,440 related to economic development.

SERVICE TEST

The bank's performance under the Service Test in Kansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Non-MSA KS AA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope:													
Non-MSA KS	100.0	2	100.0	0.0	100.0	0.0	0.0	0.0	0.0	11.6	69.0	19.4	0.0
Due to rounding, totals may not equal 100.0													

The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no low-income geographies within the AA.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had three ATMs in the AA, all of which were deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope:							
Non-MSA KS	0	0	0	0	0	0	0

The bank did not open or close any branches in the Non-MSA KS AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. In addition, BHB opened 69 SMARTMoney checking accounts in the Non-MSA KS AA.

Community Development Services

The institution provided an adequate level of CD services when considering the limited branch resources. During the evaluation period, one bank employee conducted two financial education events attended by approximately 40 participants. One event focused on basic consumer financial education and the other first-time homebuyer education to low- and moderate-income individuals and families.

State of Missouri

CRA rating for the State of Missouri[8]: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans was poor and the overall borrower distribution was adequate.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

Description of Institution's Operations in Missouri

BHB delineated one AA in the state of Missouri. It includes two counties in the Missouri portion of the St. Joseph, MO-KS (St. Joseph) MMSA. The state of Missouri rating does not include the counties that were in the Kansas City or St. Louis MMSA AAs as they were included in the respective MMSA analyses. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just over $47.8 million in deposits in this AA, which represented 0.05 percent of the bank's total deposits. During the evaluation period, the bank made almost $5.0 million or 0.05 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

BHB had a limited presence in this AA with one office location and two ATMs, of which one was deposit-taking. The bank ranked 10th in deposit market share with 2.6 percent. The top three competitors had 58.5 percent of the market and included The Nodaway Valley Bank with five branches and 25.6 percent market share, Commerce Bank with three branches and 19.9 percent market share, and U.S. Bank N.A. with five branches and 13.0 percent market share. There were 11 additional FDIC-insured depository institutions with 20 offices within the bank's AA.

St. Joseph MMSA

The following table provides a summary of the demographics, including housing and business information for the St. Joseph MMSA AA.

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

Table A – Demographic Information of the Assessment Area Assessment Area: St. Joseph MMSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	29	3.4	24.1	51.7	20.7	0.0
Population by Geography	106,889	1.6	22.4	49.3	26.7	0.0
Housing Units by Geography	45,790	2.4	23.8	50.9	22.9	0.0
Owner-Occupied Units by Geography	26,424	0.7	18.2	52.7	28.4	0.0
Occupied Rental Units by Geography	13,560	4.8	27.2	50.5	17.5	0.0
Vacant Units by Geography	5,806	4.3	41.4	43.8	10.5	0.0
Businesses by Geography	5,775	6.4	15.4	45.5	32.7	0.0
Farms by Geography	325	0.6	4.3	66.2	28.9	0.0
Family Distribution by Income Level	25,752	21.0	17.6	22.8	38.5	0.0
Household Distribution by Income Level	39,984	24.8	15.8	17.3	42.1	0.0
Median Family Income MMSA - 41140 St. Joseph, MO-KS MMSA		$59,820	Median Housing Value			$117,642
			Median Gross Rent			$704
			Families Below Poverty Level			12.5%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Information from Moody's Analytics indicated the St. Joseph MMSA AA had a less-diversified economy. Key sectors of the economy based on percentage of total employment included Government, Manufacturing, Education and Health Services, and Retail Trade. Major employers in the AA included Mosaic Life Care, Triumph Foods Inc, 139th Airlift Wing of the MO Air National Guard, and Boehringer Ingelheim Corporation. According to the BLS, the annual average unemployment rate in the St. Joseph MMSA AA was 3.5 percent in 2017, and 3.0 percent in 2018 and 2019. This was slightly lower than the overall Missouri state unemployment rates of 3.8 percent, 3.2 percent, and 3.3 percent, respectively.

Based on information in the above table, low-income families earned less than $29,910 and moderate-income families earned less than $47,856. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $748 for low-income borrowers and $1,196 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $632.

Information from one community contact interview with a community services provider identified the following needs within the St. Joseph MMSA AA:

- Affordable housing loans, including affordable senior housing.
- Housing rehabilitation loans.
- Community services for low- and moderate-income individuals.
- Financial literacy and homebuyer education.

The St. Joseph MMSA AA presented constrained opportunities to meet the identified needs. The OCC noted no certified CDFIs, no HUD-approved housing counseling agencies, and only one SBA Small Business Development center serving the AA.

Scope of Evaluation in Missouri

Examiners based the rating of the state of Missouri on the area that received a full-scope review. Examiners conducted a full-scope review of the St. Joseph MMSA AA, which was the only AA in the state that was not part of another MMSA.

Examiners emphasized home mortgage loans in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in this AA. BHB did not originate enough small loans to businesses to conduct any meaningful analyses and did not originate any small loans to farms in this AA. Examiners also considered the bank's limited branch presence and staffing in this AA when reaching conclusions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the St. Joseph MMSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full-Scope:					
St. Joseph MMSA	34	18	0	1	53
Total	**34**	**18**	**0**	**1**	**53**

Dollar Volume of Loans					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full-Scope:					
St. Joseph MMSA	3,577	1,411	0	20,000	24,988
Total	**3,577**	**1,411**	**0**	**20,000**	**24,988**

BHB ranked 10th out of 15 insured depository institutions (top 66.7 percent) with a deposit market share of 2.6 percent. For home mortgage loans, BHB's market share of 0.5 percent ranked 39th out of 186 lenders (top 21.0 percent). The top three lenders were Fairway Independent Mortgage Company with

13.7 percent market share, Primelending with 7.1 percent market share, and Commerce Bank with 6.7 percent market share.

For small loans to businesses, BHB's market share of 0.5 percent ranked 22nd out of 55 lenders (top 40.0 percent). The top three lenders were U.S. Bank N.A. with 17.1 percent market share, American Express National Bank with 14.4 percent market share, and Commerce Bank with 12.9 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a poor geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units.

Home Mortgage Loans

Refer to Table O in the state of Missouri 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.

The geographic distribution of home mortgage loans was poor. The bank did not originate or purchase any loans in low-income geographies; however, there were less than 0.1 percent of owner-occupied housing in these geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and well below the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Missouri section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was adequate. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers exceeded, the percentage of those families in the AA and aggregate percentage of all reporting lenders, respectively.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The level of CD lending was excellent. BHB made one CD loan totaling $20.0 million, which represented 317.7 percent of allocated tier 1 capital. BHB renewed a $15.0 million line of credit with a $5.0 million increase to an animal health care product distributor and aggregator. The loan allowed the company to expand and create several new jobs in an area targeted for redevelopment by state and local governments.

Product Innovation and Flexibility

The institution made limited use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made five loans or grants totaling $416,835 among the various flexible lending products available in the St. Joseph MMSA AA

INVESTMENT TEST

The institution's performance under the Investment Test in Missouri is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution's performance in the St. Joseph MMSA AA was excellent.

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)**
Full Scope:										
St. Joseph MMSA	0	0	6	1,023	6	66.7	1,023	96.5	0	0
Statewide/Regional:										
Broader MO	3	37	0	0	3	33.3	37	3.5	0	0
Totals	**3**	**37**	**6**	**1,023**	**9**	**100.0**	**1,060**	**100.0**	**0**	**0**

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

St. Joseph MMSA

The institution had an excellent level of qualified investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 16.3 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments to support CD initiatives. BHB made one qualified investment totaling $1.0 million in a LIHTC fund to construct affordable housing for low-income seniors. The property provided 38 affordable units for low-income seniors, as well as access to health services. The bank also made five grants totaling $22,500 to community service organizations that provided needed services to low- and moderate-income individuals.

Broader Statewide or Regional Areas

BHB also had $37,000 in three investments to community service organizations that continue to benefit the broader statewide or regional area.

SERVICE TEST

The bank's performance under the Service Test in Missouri is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the St. Joseph MMSA AA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Full Scope:													
St. Joseph MMSA	100.0	1	100.0	0.0	0.0	100.0	0.0	0.0	1.7	22.4	49.3	26.7	0.00
Due to rounding, totals may not equal 100.0													

The bank had only one branch in this AA located in a middle-income geography, but within close proximity to several moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had two ATMs in the AA, one of which was deposit-taking.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Full Scope:							
St. Joseph MMSA	0	0	0	0	0	0	0

The bank did not open or close any branches in the St. Joseph MMSA AA during this evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at the branch. In addition, BHB opened 34 SMARTMoney checking accounts in the St. Joseph MMSA AA.

Community Development Services

The institution provided an adequate level of CD services when considering the limited branch resources. During the evaluation period, one bank employee spent 82 hours serving in leadership roles by participating on the board and finance committee for a local social services organization that provided emergency utility assistance, affordable housing opportunities, early childhood education, nutrition, mental health, and social services to low- and moderate-income families.

State of Wisconsin

CRA rating for the State of Wisconsin[9]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of the bank's originations and purchases of home mortgage loans and small loans to businesses was adequate and the overall borrower distribution was good.

- CD loans were effective in addressing community credit needs. The institution was a leader in making CD loans, which had a positive impact on the Lending Test rating.

- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.

- The bank's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping the bank provide services across the community.

- CD services were effective and responsive in addressing community needs. The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Wisconsin

BHB delineated 14 AAs in the state of Wisconsin. They included the entirety of the Milwaukee-Waukesha-West Allis, WI (Milwaukee); Appleton, WI (Appleton); Eau Claire, WI (Eau Claire); Fond du Lac, WI (Fond du Lac); Green Bay, WI (Green Bay); Janesville-Beloit, WI (Janesville); Oshkosh-Neenah, WI (Oshkosh); Racine, WI (Racine); Sheboygan, WI (Sheboygan); and, Wausau, WI (Wausau) MSAs. The bank also delineated portions of the Duluth, MN-WI (Duluth) and La Crosse, WI-MN (La Crosse) MMSAs; and, the Madison, WI (Madison) MSA as AAs. The Non-MSA counties were combined as one AA for analysis and presentation. The state of Wisconsin rating does not include the counties in the Minneapolis and Chicago MMSA AAs that were included in the respective MMSA analyses. Refer to the table in appendix A for a list of counties reviewed.

Based on June 30, 2019, FDIC summary of deposit information, BHB had just under $21.0 billion in deposits in these AAs, which represented 20.8 percent of the bank's total deposits. During the evaluation period, the bank made almost $2.9 billion or 27.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

BHB had 179 office locations and 488 ATMs, of which 206 were deposit-taking, within these AAs. The bank ranked second in deposit market share with 15.4 percent. Primary competitors included U.S. Bank

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

N.A. with 114 branches and 18.7 percent market share, Associated Bank, N.A. with 167 branches and 12.0 percent market share, and JPMorgan Chase Bank, N.A. with 60 branches and 6.7 percent market share. There were 189 additional FDIC-insured depository institutions with 1,072 offices within the bank's AAs.

Milwaukee MSA

The following table provides a summary of the demographics, including housing and business information for the Milwaukee MSA AA.

Table A – Demographic Information of the Assessment Area **Assessment Area: Milwaukee MSA**						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	431	23.0	15.8	32.3	28.3	0.7
Population by Geography	1,570,006	16.7	14.9	33.7	34.7	0.0
Housing Units by Geography	671,468	16.1	15.1	35.4	33.4	0.0
Owner-Occupied Units by Geography	376,569	7.3	11.9	36.2	44.5	0.0
Occupied Rental Units by Geography	247,577	25.6	20.0	36.1	18.3	0.0
Vacant Units by Geography	47,322	35.9	15.3	25.0	23.9	0.0
Businesses by Geography	92,318	10.9	11.9	35.0	42.2	0.0
Farms by Geography	2,088	5.7	7.0	38.2	49.1	0.0
Family Distribution by Income Level	388,209	23.5	16.2	19.4	40.9	0.0
Household Distribution by Income Level	624,146	25.2	15.4	17.0	42.4	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		$71,764	Median Housing Value			$186,990
			Median Gross Rent			$841
			Families Below Poverty Level			11.1%
Source: 2015 ACS Census and 2019 D&B Data *Due to rounding, totals may not equal 100.0* *(*) The NA category consists of geographies that have not been assigned an income classification.*						

The Milwaukee MSA AA consisted of the four counties in the MSA in their entirety: Milwaukee, Ozaukee, Washington, and Waukesha. According to the FDIC's Summary of Deposits as of June 30, 2019, BHB deposits in the AA comprised 10.3 percent of the bank's total deposits, making this AA the bank's second largest in terms of deposits held.

BHB operated 61 branches in the AA and had a 16.4 percent deposit market share which ranked second among all institutions. Competition was significant with approximately 49 other FDIC-insured depository institutions operating 414 offices in the AA. Major competitors included U.S. Bank, N.A. with 50 branches and 34.1 percent deposit market share, JPMorgan Chase Bank, N.A. with 29 branches and 9.8 percent deposit market share, and Associated Bank, N.A. with 50 branches and 9.6 percent market share.

Information from Moody's Analytics indicated the Milwaukee MSA AA had a moderately-diversified economy. Key sectors of the economy by percentage of employment included Education and Health Services, Professional and Business Services, Manufacturing, and Government. Major employers in the

AA included Aurora Health Care Inc., Ascension Wisconsin, Froedtert Health, The Kroger Company and Quad Graphics Inc. Based on data from the BLS, the annual average unemployment rate in the Milwaukee MSA AA was 3.5 percent in 2017, 3.2 percent in 2018, and 3.3 percent in 2019. This was slightly higher than the overall Wisconsin state unemployment rates of 3.3 percent, 3.0 percent, and 3.1 percent, respectively.

Based on information in the above table, low-income families earned less than $35,882 and moderate-income families earned less than $57,412. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $897 for low-income borrowers and $1,435 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $1,004. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from eight community contact interviews; one from an economic development entity, three from affordable housing organizations, three from local government agencies, and one from a community service provider, identified the following needs within the Milwaukee MSA AA:

- Small dollar, unsecured consumer loans as an alternative to payday lenders.
- Financial education, including negotiating debt management plans.
- Flexible loan programs for home purchase and rehabilitation, including use of alternative credit data.
- Down payment and closing cost assistance for low- and moderate-income borrowers.
- Support for workforce development.
- Homebuyer counseling programs.
- Investments in CDFIs that lend to small businesses.
- Credit builder products and participation in credit enhancement programs.
- Financing for start-up businesses.

The Milwaukee MSA AA offered numerous opportunities to meet the identified needs. There were a variety of CD and social service organizations, including 11 certified CDFIs, 10 HUD-approved housing counseling agencies, and two SBA Small Business Development center serving the AA.

Green Bay MSA

The following table provides a summary of the demographics, including housing and business information for the Green Bay MSA AA.

Table A – Demographic Information of the Assessment Area **Assessment Area: Green Bay MSA**						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	70	4.3	25.7	50.0	15.7	4.3
Population by Geography	312,676	1.9	24.1	50.5	23.2	0.4
Housing Units by Geography	139,572	2.0	26.3	52.0	19.8	0.0
Owner-Occupied Units by Geography	85,931	0.9	19.8	54.7	24.6	0.0
Occupied Rental Units by Geography	38,333	4.2	38.7	42.8	14.3	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Green Bay MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Vacant Units by Geography	15,308	2.3	31.5	59.6	6.7	0.0
Businesses by Geography	17,791	2.8	24.9	49.9	22.4	0.0
Farms by Geography	976	0.6	14.9	57.1	27.5	0.0
Family Distribution by Income Level	81,408	19.8	18.4	22.0	39.8	0.0
Household Distribution by Income Level	124,264	22.6	16.9	19.1	41.3	0.0
Median Family Income MSA - 24580 Green Bay, WI MSA		$67,666	Median Housing Value			$154,870
			Median Gross Rent			$707
			Families Below Poverty Level			8.1%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

The Green Bay MSA AA consisted of the three counties in the MSA in their entirety: Brown, Kewaunee, and Oconto. According to the FDIC's Summary of Deposits as of June 30, 2019, BHB deposits in the AA comprised 1.1 percent of the bank's total deposits.

BHB operated 11 branches in the AA and had a 14.6 percent deposit market share which ranked third among all institutions. Competition was significant with 21 other FDIC-insured depository institutions operating 81 offices in the AA. Major competitors included Associated Bank, N.A. with 17 branches and 34.2 percent deposit market share, Nicolet National Bank with 12 branches and 15.5 percent deposit market share, and Wells Fargo Bank, N.A. with five branches and 5.2 percent market share.

Information from Moody's Analytics indicated the Green Bay MSA AA had a less-diversified economy. Key sectors of the economy based on percentage of total employment included Manufacturing, Education and Health Services, Government, and Professional and Business Services. Major employers in the AA included Humana Inc., Bellin Health, Oneida Tribe of Indians of WI, and Schneider National. Based on data from the BLS, the annual average unemployment rate in the Green Bay MSA AA was 3.0 percent in 2017, 2.8 percent in 2018, and 2.9 percent in 2019. This was slightly lower than the overall Wisconsin state unemployment rates of 3.3 percent, 3.0 percent, and 3.1 percent, respectively.

Based on information in the above table, low-income families earned less than $33,833 and moderate-income families earned less than $54,133. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $846 for low-income borrowers and $1,353 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $831. The majority of low-income borrowers would be challenged to afford a mortgage loan in this AA.

Information from two community contact interviews; one from an economic development entity and the other from an affordable housing organization, identified the following needs within the Green Bay MSA AA:

- Flexible mortgage loan programs for low- and moderate-income areas and individuals.
- Credit builder loan programs.
- Funding for business start-ups and expansions, including working capital loans.

The Green Bay MSA AA offered limited opportunities to meet the identified needs. There were few CD and social service organizations, including two certified CDFIs, two HUD-approved housing counseling agencies, and one SBA Small Business Development centers serving the AA.

Janesville MSA

The following table provides a summary of the demographics, including housing and business information for the Janesville MSA AA.

Table A – Demographic Information of the Assessment Area **Assessment Area: Janesville MSA**						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	38	2.6	34.2	39.5	23.7	0.0
Population by Geography	160,727	1.7	27.6	42.8	27.9	0.0
Housing Units by Geography	68,332	1.6	27.8	43.3	27.3	0.0
Owner-Occupied Units by Geography	44,177	0.8	21.4	46.2	31.7	0.0
Occupied Rental Units by Geography	19,668	2.9	40.3	38.9	17.8	0.0
Vacant Units by Geography	4,487	4.4	36.0	34.3	25.3	0.0
Businesses by Geography	7,861	1.3	26.4	38.1	34.2	0.0
Farms by Geography	506	0.8	7.9	41.5	49.8	0.0
Family Distribution by Income Level	42,099	20.7	18.2	21.6	39.6	0.0
Household Distribution by Income Level	63,845	22.7	17.6	18.4	41.3	0.0
Median Family Income MSA - 27500 Janesville-Beloit, WI MSA		$60,820	Median Housing Value			$130,169
			Median Gross Rent			$736
			Families Below Poverty Level			11.6%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

The Janesville MSA AA consisted of Rock County in its entirety. According to the FDIC's Summary of Deposits as of June 30, 2019, BHB deposits in the AA comprised 0.5 percent of the bank's total deposits.

BHB operated eight branches in the AA and had an 18.5 percent deposit market share which ranked first among all institutions. Competition was significant with 16 other FDIC-insured depository institutions operating 24 offices in the AA. Major competitors included Associated Bank, N.A. with two branches and 18.0 percent deposit market share, Johnson Bank with three branches and 13.8 percent deposit market share, and The First National Bank and Trust Company with six branches and 12.7 percent market share.

Information from Moody's Analytics indicated the Janesville MSA AA had a less-diversified economy. Key sectors of the economy based on percentage of total employment included Education and Health Services, Manufacturing, Government, and Retail Trade. Major employers in the AA included Mercyhealth, Beloit Health System, Grainger Inc., and Hendricks Holdings. Based on data from the BLS, the annual average unemployment rate in the Janesville MSA AA was 3.0 percent in 2017, 2.8 percent in 2018, and 2.9 percent in 2019. This was slightly lower than the overall Wisconsin state unemployment rates of 3.3 percent, 3.0 percent, and 3.1 percent, respectively.

Based on information in the above table, low-income families earned less than $30,410 and moderate-income families earned less than $48,656. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of $760 for low-income borrowers and $1,216 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be $699.

Information from two community contact interviews; one from an economic development entity and the other from a local government agency, identified the following needs within the Janesville MSA AA:

- Loans and investments in affordable single-family and multi-family housing.
- Down payment and closing cost assistance for low- and moderate-income borrowers.
- Financial education, including first-time homebuyer.
- Financing for small businesses.
- Construction loans and commercial real estate loans for small businesses.

The Janesville MSA AA presented constrained opportunities to meet the identified needs. There were few non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. The OCC noted no certified CDFIs or SBA Small Business Development centers, and only one HUD-approved housing counseling agency serving the AA.

Scope of Evaluation in Wisconsin

Since the state of Wisconsin was BHB's second largest market, examiners selected three AAs for full-scope reviews. Examiners completed a full-scope review for the Milwaukee MSA AA as it was the AA with the largest percentage of deposits at 49.3 percent and BHB's market share of 16.4 percent ranked them second out of 46 depository institutions. As a result, this AA was the most heavily weighted when arriving at the overall conclusion. Examiners also selected the Green Bay and Janesville MSA AAs to receive full-scope reviews. The Appleton; Duluth; Eau Claire; Fond du Lac; La Crosse; Madison; Oshkosh; Racine; Sheboygan, and Wausau MSA AAs; and, the Non-MSA WI areas received limited scope reviews. Refer to the table in appendix A for more information.

The 2019 OMB changes affected only the limited-scope areas of Wausau MSA and Non-MSA WI AAs. OMB added Lincoln county, a former Non-MSA county to the Wausau MSA. As a result, examiners included 2017 and 2018 data for Lincoln county in the Non-MSA area analysis and 2019 data in the Wausau MSA AA analysis. The different data periods were identified on the respective AA entries on Tables O through T in the state of Wisconsin section of appendix D.

Examiners based the ratings on the results of the areas that received full-scope reviews and the bank's performance in the limited-scope areas, as applicable. The Milwaukee MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Wisconsin.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses and small loans to farms in arriving at the overall conclusion. HMDA loans represented the majority of BHB's lending in all 14 AAs. BHB originated too few small loans to farms in the Duluth, La Crosse, Oshkosh, Racine, Sheboygan, and the 2019 Wausau MSA AAs to conduct any meaningful analyses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee, Green Bay, and Janesville MSA AAs was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full-Scope:					
Milwaukee MSA	5,047	2,064	53	70	7,234
Green Bay MSA	1,150	376	61	16	1,603
Janesville MSA	507	134	41	6	688
Limited-Scope:					
Appleton MSA	624	227	70	14	935
Duluth MSA	58	13	0	0	71
Eau Claire MSA	198	62	48	2	310
Fond du Lac MSA	261	43	27	6	337
La Crosse MSA	132	111	10	1	254
Madison MSA	1,387	352	84	16	1,839
Oshkosh MSA	317	81	15	12	425
Racine MSA	460	142	8	7	617
Sheboygan MSA	406	56	12	2	476
Wausau MSA 17-18	197	68	32	3	515
Wausau MSA 19	169	38	8		
Non-MSA WI 17-18	2,141	547	484	32	4,426
Non-MSA WI 19	935	188	99		
Statewide/Regional:					
Broader WI	0	0	0	2	2

Number of Loans*					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Total	**13,989**	**4,502**	**1,052**	**189**	**19,732**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

Dollar Volume of Loans ($000) *					
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**
Full Scope:					
Milwaukee MSA	845,037	318,694	7,826	304,666	1,476,223
Green Bay MSA	148,784	52,466	7,842	34,428	243,520
Janesville MSA	49,170	19,920	8,522	37,174	114,786
Limited Scope:					
Appleton MSA	90,235	43,010	12,682	20,118	166,045
Duluth MSA	4,458	1,688	0	0	6,146
Eau Claire MSA	26,470	9,775	11,027	11,446	58,718
Fond du Lac MSA	35,100	4,314	3,186	25,809	68,409
La Crosse MSA	13,152	11,685	2,476	1,250	28,563
Madison MSA	269,681	47,694	16,087	71,587	405,049
Oshkosh MSA	46,198	9,495	2,081	38,399	96,173
Racine MSA	50,431	17,690	476	10,516	79,113
Sheboygan MSA	46,493	6,649	1,740	8,925	63,807
Wausau MSA 17-18	22,437	10,823	3,598	4,059	62,714
Wausau MSA 19	14,314	6,725	758		
Non-MSA WI 17-18	269,153	77,209	84,932	74,793	649,983
Non-MSA WI 19	103,358	21,289	19,249		
Statewide/Regional:					
Broader WI	0	0	0	4,996	4,996
Total	**2,034,471**	**659,126**	**182,482**	**648,166**	**3,524,245**
* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

Milwaukee MSA

BHB's lending activity in the Milwaukee MSA AA reflected good responsiveness to AA credit needs. BHB ranked second out of 46 insured depository institutions (top 4.3 percent) with a deposit market share of 16.4 percent. For home mortgage loans, BHB's market share of 4.5 percent ranked fifth out of 487 lenders (top 1.0 percent). The top three lenders were Landmark Credit Union with 10.9 percent market share, Wells Fargo Bank, N.A. with 7.1 percent market share, and JPMorgan Chase Bank, N.A. with 5.1 percent market share.

For small loans to businesses, BHB's market share of 2.2 percent ranked ninth out of 111 lenders (top 8.1 percent). The top three lenders were U.S. Bank, N.A. with 20.2 percent market share, Chase Bank USA, N.A. with 17.6 percent market share, and American Express National Bank with 12.7 percent market share. The top five small business loan lenders are institutions with large business credit card portfolios with average loan sizes of less than $30,000. BHB's average small business loan size was $159,000.

For small loans to farms, BHB's market share of 9.8 percent ranked fourth out of 20 lenders (top 20.0 percent). The top three lenders were U.S. Bank, N.A. with 31.6 percent market share, John Deere Financial, FSB with 20.1 percent market share, and Chase Bank USA, N.A. with 15.5 percent market share.

Green Bay MSA

BHB's lending activity in the Green Bay MSA AA reflected excellent responsiveness to AA credit needs. BHB ranked third out of 22 insured depository institutions (top 13.6 percent) with a deposit market share of 14.6 percent. For home mortgage loans, BHB's market share of 3.9 percent ranked sixth out of 275 lenders (top 2.2 percent). The top three lenders were Associated Bank, N.A. with 9.9 percent market share, Fox Communities with 8.1 percent market share, and Nicolet National Bank with 7.5 percent market share.

For small loans to businesses, BHB's market share of 2.4 percent ranked 10th out of 72 lenders (top 13.9 percent). The top three lenders were U.S. Bank, N.A. with 16.5 percent market share, Nicolet National Bank with 15.4 percent market share, and Chase Bank USA, N.A. with 12.0 percent market share. Six of the top seven small business loan lenders are institutions with large business credit card portfolios with average loan sizes of less than $18,000. BHB's average small business loan size was $150,000.

For small loans to farms, BHB's market share of 9.8 percent ranked fourth out of 17 lenders (top 23.5 percent). The top three lenders were John Deere Financial, FSB with 24.3 percent market share, U.S. Bank, N.A. with 17.8 percent market share, and Nicolet National Bank with 13.1 percent market share.

Janesville MSA

BHB's lending activity in the Janesville MSA AA reflected good responsiveness to AA credit needs. BHB ranked first out of 17 insured depository institutions (top 5.9 percent) with a deposit market share of 18.5 percent. For home mortgage loans, BHB's market share of 3.9 percent ranked sixth out of 239 lenders (top 2.5 percent). The top three lenders were Blackhawk Community Credit Union with 14.9 percent market share, Johnson Bank with 6.9 percent market share, and Summit Credit Union with 6.8 percent market share.

For small loans to businesses, BHB's market share of 2.2 percent ranked 13th out of 59 lenders (top 22.0 percent). The top three lenders were U.S. Bank, N.A. with 17.2 percent market share, Chase Bank USA, N.A. with 15.1 percent market share, and American Express National Bank with 10.4 percent market share. Six of the top seven small business loan lenders are institutions with large business credit card portfolios with average loan sizes of less than $15,000. BHB's average small business loan size was $99,000.

For small loans to farms, BHB's market share of 10.7 percent ranked fourth out of 14 lenders (top 28.6 percent). The top three lenders were John Deere Financial, FSB with 21.5 percent market share, and State Bank of the Lakes and Town Bank both with 16.8 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

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.

Milwaukee MSA

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies below, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was near-to the aggregate percentage of all reporting lenders.

Green Bay MSA

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was well below, and in moderate-income geographies approximated, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below, and in moderate-income geographies approximated, the aggregate percentage of all reporting lenders.

Janesville MSA

The geographic distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was below, both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders, respectively.

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.

Milwaukee MSA

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies approximated, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was near-to, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

Green Bay MSA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Janesville MSA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table S 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 farms. Examiners considered the small number of farms located in low- and moderate-income geographies and that farm lending was not a primary product for the bank.

Milwaukee MSA

The geographic distribution of small loans to farms was adequate. The percentage of small loans to farms originated or purchased in low-income geographies was well below the percentage of farms located in those geographies but exceeded the aggregate percentage of all reporting lenders. BHB did not originate or purchase any small loans to farms in moderate-income geographies.

Green Bay MSA

BHB's geographic distribution of small loans to farms was adequate. BHB did not originate or purchase any small loans to farms in either low- or moderate-income geographies.

Janesville MSA

BHB's geographic distribution of small loans to farms was adequate. BHB did not originate or purchase any small loans to farms in either low- or moderate-income geographies.

Lending Gap Analysis

The OCC analyzed BHB's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

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.

Milwaukee MSA

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income families. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

Green Bay MSA

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for the majority of low-income families. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

Janesville MSA

The distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

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 origination and purchase of small loans to businesses.

Milwaukee MSA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Green Bay MSA

The distribution of loans to businesses of different sizes was adequate. The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but was near-to the aggregate percentage of all reporting lenders.

Janesville MSA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table T 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. Examiners considered that small farm lending was not a primary focus for the bank.

Milwaukee MSA

The distribution of loans to farms of different sizes was adequate. The percentage of loans to small farms originated or purchased was well below the percentage of small farms in the AA but was near-to the aggregate percentage of all reporting lenders.

Green Bay MSA

The distribution of loans to farms of different sizes was good. The percentage of loans to small farms originated or purchased was below the percentage of small farms in the AA but exceeded the aggregate percentage of all reporting lenders.

Janesville MSA

The distribution of loans to farms of different sizes was adequate. The percentage of loans to small farms originated or purchased was significantly below the percentage of small farms in the AA but was well below the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion for all three full-scope AAs.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Milwaukee MSA

The level of CD lending was excellent. BHB made 70 loans totaling almost $304.7 million, which represented 22.4 percent of allocated tier 1 capital. The bank utilized complex CD loans, often in a leadership position. These loans were responsive to identified community credit needs. By dollar volume, 55.5 percent of these loans funded affordable housing, 22.6 percent funded community services, 11.4 percent funded economic development activities, and 10.6 percent funded revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- A $7.4 million construction loan for the development of 40 affordable apartment units. The project included conversion of a former school building to apartments and construction of three new townhouse apartment buildings. Thirty-four units were set aside for residents earning 60 percent of area median income or lower. This project consisted of complex financing, which included LIHTCs, federal and state historic tax credits (HTCs). FHLB AHP funds, Wisconsin Housing and Economic Development Authority (WHEDA) capital management funds, and Waukesha County Development HOME funds.

- A $8.1 million construction loan to finance a medical clinic in a low-income geography. The clinic, which provided primary care, specialty care, and diagnostic services to the downtown area and surrounding neighborhoods, helped revitalize the low-income geography.

- A $3.25 million loan and renewed a $5.0 million working line of credit to a CDFI. This financing supported the CDFI's loan programs. The CDFI served Milwaukee businesses with a mission to give them the financial resources needed to grow, while facilitating business investment that will benefit Milwaukee through new employment opportunities, job retention, and neighborhood stabilization.

Green Bay MSA

The level of CD lending was excellent. BHB made 16 loans totaling over $34.4 million, which represented 22.8 percent of allocated tier 1 capital. The bank occasionally utilized complex CD loans, often in a leadership position. These loans were responsive to identified community credit needs. By dollar volume, 91.6 percent of these loans funded affordable housing, 6.8 percent funded economic development activities, and 1.6 percent funded community services.
Examples of CD loans in the AA include:

- BHB funded a $6.7 million construction loan to finance the development of 40 affordable apartment units. The project included the adaptive reuse of a vacant monastery dormitory as well as new construction. This property was in a moderate-income geography and 34 of the apartments will be LIHTC units. The remaining six units will be market rate but are also considered affordable. Additional sources of funding included a WHEDA permanent loan, federal and state HTCs, HOME City funds, and FHLB AHP funds.

- BHB provided a $2.3 million term loan to construct a new facility for a custom plastic manufacturer and fabricator. The new facility created more space for manufacturing, distribution, and operations. The company had approximately 150 employees and this new facility will create an additional 10 jobs for local residents.

Janesville MSA

The level of CD lending was excellent. BHB made six loans totaling almost $37.2 million, which represented 54.8 percent of allocated tier 1 capital. The bank utilized complex CD loans, often in a leadership position. These loans were responsive to identified community needs. By dollar volume, 58.3 percent of these loans funded revitalization and stabilization efforts, 26.9 percent funded economic development activities, and 14.6 percent funded affordable housing.

Examples of CD loans in the AA include:

- $21.2 million in funding to renovate a historical powerhouse into a multi-purpose student center in Beloit, WI. The building was in a moderate-income geography and the completed project included uses for the local college as well as public spaces available to the residents of the city. This complex project was structured with various sources of funding, which included NMTCs, HTCs, and capital campaign funds.

- $10.0 million in funding for the expansion of a metal fabrication and powder coating company. The project included an addition to the existing facility, as well as, the construction of a new building on an adjacent property. The expansion created 66 new permanent jobs over a three-year period. Additional funding sources included TIF and WHEDA refundable tax credits.

Broader Statewide or Regional Areas

BHB made two CD loans totaling almost $5.0 million to entities in the broader statewide or regional area. One loan provided permanent financing for 40 affordable housing units, including 10 units for veterans or individuals at risk of homelessness. The other loan related to economic development.

Product Innovation and Flexibility

Milwaukee MSA

The institution made extensive use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 982 loans totaling $54.5 million among the various flexible lending products available in the Milwaukee MSA AA, which included 195 Home Possible loans totaling $22.8 million, 95 HFA loans totaling $11.8 million, 107 NHLP loans totaling $11.0 million, 47 FHA loans totaling $6.5 million, 222 DPA grants totaling $1.1 million, 310 BHB Grants totaling $434,000, and six HARP loans totaling $830,000.

Green Bay MSA

The institution used innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 115 loans totaling $5.1 million among the various flexible lending products available in the Green Bay MSA AA, which included 22 Home Possible loan totaling $2.3 million, 12 NHLB loans totaling $1.3 million, five FHA loans totaling $909,000, and five HFA loans totaling $491,000.

Janesville MSA

The institution made limited use of innovative or flexible lending practices in order to serve AA credit needs. During the evaluation period, BHB made 89 loans totaling $4.7 million among the various lending products available in the Janesville MSA AA, which included 15 HFA loans totaling $1.6 million, eight FHA loans totaling $1.1 million, 10 Home Possible loans totaling $945,000, and 10 NHLP loans totaling $796,000.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fond du Lac, Madison, Oshkosh, Racine, Sheboygan, and Wausau MSA, and the Non-MSA WI AAs was consistent with the bank's overall outstanding performance under the Lending Test in the full-scope areas. Performance in the Appleton, Duluth, Eau Claire, and La Crosse MSA AAs was weaker than the bank's performance in the full-scope areas. The weaker performance in the Duluth MSA AA was due to lack of CD lending. The weaker performance in the Eau Claire MSA AA was due to poorer geographic distribution. The weaker performance in the Appleton and La Crosse MSA AAs was due to poorer geographic and borrower distributions. The Lending Test performance in the limited-scope areas did not have an impact on the overall Lending Test rating for the state of Wisconsin.

Refer to Tables O through T in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Wisconsin is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope reviews, the institution's performance in the Milwaukee and Green Bay MSA AAs was excellent and good in the Janesville MSA AA.

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)
Full Scope:										
Milwaukee MSA	35	54,267	238	65,925	273	40.6	120,192	49.0	18	6,308
Green Bay MSA	1	474	41	9,172	42	6.2	9,646	3.9	0	0
Janesville MSA	9	2,699	31	1,076	40	5.9	3,775	1.5	0	0
Limited Scope:										
Appleton MSA	7	7,514	13	1,111	20	3.0	8,625	3.5	3	169
Duluth MSA	2	231	5	1,070	7	1.0	1,301	0.5	1	7
Eau Claire MSA	0	0	28	1,810	28	4.2	1,810	0.7	0	0
Fond du Lac MSA	2	946	4	1,438	6	0.9	2,384	1.0	2	58
La Crosse MSA	1	290	14	153	15	2.2	443	0.2	0	0
Madison MSA	11	16,587	63	16,473	74	11.0	33,060	13.5	6	2,208
Oshkosh MSA	1	359	11	120	12	1.8	479	0.2	1	28
Racine MSA	4	6,096	3	4,329	7	1.0	10,425	4.3	2	738
Sheboygan MSA	1	922	12	521	13	1.9	1,443	0.6	1	330
Wausau MSA	2	1,734	18	2,009	20	3.0	3,743	1.5	2	532
Non-MSA WI	32	18,858	58	20,800	90	13.4	39,658	16.2	2	787

Qualified Investments*										
Assessment Area	**Prior Period****		**Current Period**		**Total**				**Unfunded Commitments*****	
	#	**$(000's)**	**#**	**$(000's)**	**#**	**% of Total #**	**$(000's)**	**% of Total $**	**#**	**$(000's)**
Statewide/Regional:										
Broader WI	15	5,311	11	3,083	26	3.9	8,394	3.4	2	12
Totals	**123**	**116,288**	**550**	**129,090**	**673**	**100.0**	**245,378**	**100.0**	**40**	**11,177**

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
** 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.

Milwaukee MSA

The institution had an excellent level of qualified investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 8.8 percent of tier 1 capital allocated to the AA. This did not include 18 unfunded commitments totaling $6.3 million, an additional 0.5 percent of allocated capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments in LIHTC funds, CDFIs, and SBICs to support CD initiatives. BHB had 41 qualified investments and grants totaling $88.7 million related to affordable housing, 19 qualified investments and grants totaling $21.6 million related to economic development, 17 qualified investments and grants totaling $1.5 million for revitalization and stabilization efforts, and 196 qualified investments and grants totaling $8.3 million to community service organizations that provided needed services to low- and moderate-income individuals.

Examples of qualified investments in the AA include:

- A $10.0 million investment in a LIHTC fund that acquired a National Historic Landmark District property for rehabilitation as affordable housing. The property, located in a low-income geography, provided 101 units for low- and moderate-income veterans and their families who are homeless or at risk of becoming homeless.

- A $6.0 million investment in a private-equity company that provided economic development investments to the upper Midwest states. The company invested in micro-cap companies that are: primarily located in low- and moderate-income geographies; hire workers living in low- and moderate-income geographies; provide jobs for low- and moderate-income individuals; or, provide goods or services to low- and moderate-income communities. The company targeted BHB's investment to micro-cap companies in the Milwaukee MSA AA.

Green Bay MSA

The institution had an excellent level of qualified investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 6.4 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. The institution occasionally used innovative or complex investments in LIHTC funds to support CD initiatives. BHB had six qualified investments and grants totaling almost $9.3 million related to

affordable housing, 33 grants totaling $339,000 to community service organizations that provided needed services to low- and moderate-income individuals, and three grants totaling $9,000 related to economic development.

Examples of qualified investments in the AA include:

- A $6.8 million investment in a single-investor LIHTC fund that acquired a vacant monastery property for rehabilitation as affordable housing. The property, located in a moderate-income geography, provided 34 affordable units for low- and moderate-income individuals and six market rate units that are also considered affordable.

- A $2.0 million investment for the construction of a multifamily apartment complex by a local community development authority. The property provided 39 affordable housing units for low- and moderate-income residents.

Janesville MSA

The institution had a significant level of qualified investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 5.6 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. The institution rarely used any innovative or complex investments to support CD initiatives in this AA. BHB had three qualified investments totaling $1.8 million related to affordable housing, 30 qualified investments and grants totaling $1.1 million to community service organizations that provided needed services to low- and moderate-income individuals, and seven qualified investments and grants totaling $949,993 for revitalization and stabilization efforts.

Examples of qualified investments in the AA include:

- A $901,000 investment in six municipal bonds for improvements to a local high school. The school was in a moderate-income geography where 64 percent of students qualify for free and reduced lunch programs.

- An investment valued at $1.4 million in a mortgage-backed security for a 52-unit, multifamily apartment complex that provided affordable housing for low- and moderate-income individuals.

Broader Statewide or Regional Areas

BHB also had $8.4 million in 26 investments that benefited the broader statewide or regional area. Investments included two related to affordable housing, five for economic development, one for revitalization and stabilization efforts, and 18 for community services benefiting low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Appleton, Duluth, Eau Claire, Fond du Lac, Madison, Racine, and Sheboygan MSA AAs, and the Non-MSA WI

AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance under the Investment Test in the La Crosse, Oshkosh, and Wausau MSA AAs was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower volume of qualified investments. The institution's performance under the Investment Test in the limited-scope areas had a neutral impact on the overall Investment Test rating for the state of Wisconsin.

SERVICE TEST

The bank's performance under the Service Test in Wisconsin is rated Outstanding

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee, Green Bay, and Janesville MSA AAs was excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System*													
Assessment Area	**Deposits**	**Branches**							**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**					**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**	**Low**	**Mod**	**Mid**	**Upp**	**NA**
Full-Scope:													
Milwaukee MSA	49.3	61	34.1	14.8	9.8	32.8	42.6	0.0	16.7	14.9	33.7	34.7	0.0
Green Bay MSA	5.5	11	6.2	9.1	27.3	54.6	9.1	0.0	1.9	24.1	50.5	23.2	0.4
Janesville MSA	2.5	8	4.5	0.00	37.5	25.0	37.5	0.0	1.7	27.6	42.8	27.9	0.0
Limited-Scope:													
Appleton MSA	3.9	9	5.0	0.0	11.1	88.9	0.0	0.0	0.0	11.1	80.3	8.6	0.0
Duluth MSA	0.4	1	0.6	100.0	0.0	0.0	0.0	0.0	11.9	14.5	57.1	16.5	0.0
Eau Claire MSA	0.9	3	1.7	0.0	33.3	66.7	0.0	0.0	0.0	16.6	70.9	12.5	0.0
Fond du Lac MSA	0.9	2	1.1	0.0	0.0	100.0	0.0	0.0	3.6	5.7	82.0	8.6	0.0
La Crosse MSA	0.6	3	1.7	0.0	33.3	66.7	0.0	0.0	2.1	15.7	60.3	17.7	4.2
Madison MSA	15.5	22	12.3	4.6	22.7	50.0	22.7	0.0	3.6	14.1	54.2	25.0	3.1
Oshkosh MSA	0.8	3	1.7	0.0	33.3	33.3	33.3	0.0	0.0	15.4	62.3	22.3	0.0
Racine MSA	1.9	6	3.4	0.0	16.7	50.0	16.7	16.7	6.7	20.3	53.3	18.9	0.8
Sheboygan MSA	1.1	4	2.2	0.0	0.0	100.0	0.0	0.0	0.0	13.0	72.2	14.8	0.0
Wausau MSA	4.3	7	3.9	14.3	14.3	57.1	14.3	0.0	1.8	10.9	71.4	15.9	0.0
Non-MSA WI	12.4	39	21.8	0.0	28.2	66.7	5.1	0.0	0.0	8.6	76.1	14.9	0.4

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.
Due to rounding, totals may not equal 100.0

Milwaukee MSA

The bank's distribution of branches in low- income geographies was near-to, and in moderate-income geographies was below, the percentage of the population living within those geographies. When considering the seven adjacent-serving middle- and upper-income branches, two serving low-income geographies and five serving moderate-income geographies within the AA, the distribution exceeded the percentage of the population within both low- and moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 201 ATMs in the AA, of which 74 were deposit-taking.

Green Bay MSA

The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies. BHB also had three adjacent-serving branches near moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 22 ATMs in the AA, of which 12 were deposit-taking.

Janesville MSA

The bank did not have any branches in low-income geographies; however, only 1.7 percent of the population lived within those geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. BHB also had two adjacent-serving branches near moderate-income geographies.

BHB had several alternative delivery systems including debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. BHB had 18 ATMs in the AA, of which eight were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Full-Scope:							
Milwaukee MSA	0	10	-1	-2	-1	-6	0
Green Bay MSA	0	1	-1	0	0	0	0
Janesville MSA	0	0	0	0	0	0	0
Limited-Scope:							
Appleton MSA	0	1	0	-1	0	0	0
Duluth MSA	0	0	0	0	0	0	0

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Eau Claire MSA	0	1	0	-1	0	0	0
Fond du Lac MSA	0	0	0	0	0	0	0
La Crosse MSA	0	0	0	0	0	0	0
Madison MSA	0	0	0	0	0	0	0
Oshkosh MSA	0	0	0	0	0	0	0
Racine MSA	0	0	0	0	0	0	0
Sheboygan MSA	0	1	0	0	-1	0	0
Wausau MSA	0	1	0	0	-1	0	0
Non-MSA WI	0	3	0	0	-3	0	0
* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.							

Milwaukee MSA

To the extent changes had been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB closed 10 branches, one of which was in a low-income geography and two in moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches closed on Saturdays were in areas with minimal retail business activity on the weekend. In addition, BHB opened 10,488 SMARTMoney checking accounts and 457 Credit Builder accounts in the Milwaukee MSA AA.

Green Bay MSA

To the extent changes had been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. BHB closed one branch located in a low-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches closed on Saturdays were in areas with minimal retail business activity on the weekend. In addition, BHB opened 978 SMARTMoney checking accounts and 18 Credit Builder accounts in the Green Bay MSA AA.

Janesville MSA

The bank did not open or close any branches within the Janesville MSA AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. BHB maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. Branches were open late on Fridays and the vast majority of the branches had Saturday hours. The branches closed on Saturdays were in areas with minimal retail business activity on the weekend. In addition, BHB opened 1,144 SMARTMoney checking accounts and 43 Credit Builder accounts in the Janesville MSA AA.

Community Development Services

Milwaukee MSA

The institution was a leader in providing CD services in this AA. During the evaluation period, 144 bank employees conducted 136 financial education events totaling 1,386 hours in coordination with 19 different organizations. Approximately 5,150 participants attended these classes. These events included financial literacy for both adults and students, first-time homebuyer, credit repair, and housing fairs and seminars primarily targeted to low- and moderate-income individuals and families. In addition, 37 bank employees spent 1,800 hours serving in leadership roles by participating on boards and committees for 41 different CD organizations.

Examples of CD services in the AA include:

- A bank employee was the chairman of the board of a non-profit organization that provided mental health services, job readiness programs, and parenting education and coaching to low- and moderate-income women who were facing addiction and homelessness. In addition, two employees provided basic financial education classes to women housed in the shelter.

- A senior level bank employee served on the board of the local chapter of a community development organization. The organization invested in businesses, housing, and other community infrastructure to improve the economic, health, safety, and educational opportunities for the communities they served, including low- and moderate-income geographies and persons.

Green Bay MSA

The institution provided a significant level of CD services in this AA. During the evaluation period, two bank employees conducted 11 financial education events totaling 85 hours in coordination with two different organizations. Approximately 180 participants attended these classes. These events included financial literacy for both adults and students and housing seminars primarily targeted to low- and moderate-income individuals and families. In addition, three bank employees spent 192 hours serving in leadership roles by participating on boards and committees for three different CD organizations.

Examples of CD services in the AA include:

- A senior level bank employee served on the local board of a nationwide non-profit organization that provided a safe and inviting place for children to learn and grow. They offered education, health, life skills, and leadership programs for all area youth, including those from low- and moderate-income families.

- A senior level bank employee served on the local board of a national organization that provided critical repairs, accessibility modifications, and energy efficient upgrades to neighbors in need at no cost to service recipients. Their goal was to revitalize and stabilize vulnerable neighborhoods and communities across the country.

Janesville MSA

The institution provided a significant level of CD services in this AA. During the evaluation period, five bank employees conducted 20 financial education events totaling 72 hours in coordination with five different organizations. Approximately 430 participants attended these classes. These events included financial literacy for students, first-time homebuyer, and housing seminars primarily targeted to low- and moderate-income individuals and families. In addition, four bank employees spent over 160 hours serving in leadership roles by participating on boards and committees for three different CD organizations.

An example of a CD service in the AA includes:

- Two senior level bank employees served on the local board and finance committee of a nationwide non-profit organization that enabled young people, especially those at risk, to reach their full potential as responsible citizens. They provided educational enhancement and career exploration, character and leadership, and health and life skills programs for all area youth. Over 78 percent of the children in the programs qualify for free or reduced lunch programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Appleton, Duluth, Eau Claire, Fond du Lac, La Crosse, Madison, Oshkosh, Racine, Sheboygan, and Wausau MSA AAs and Non-MSA WI AAs was consistent with the bank's overall performance under the Service Test in the full-scope areas.

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," and those that received a less comprehensive review, designated by the term "limited."

Time Period Reviewed:	January 1, 2017 to December 31, 2019	
Bank Products Reviewed:	Home mortgage, small business, small farm, community development loans, qualified investments, community development services	
Affiliate(s):	**Affiliate Relationship**	**Products Reviewed**
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSAs		
Chicago-Naperville-Elgin, IL-IN-WI MMSA	Full	IL - Cook, DuPage, Grundy, Kane, Kendall, Lake, McHenry, Will IN – Lake, Porter WI - Kenosha
Kansas City, MO–KS MMSA	Full	KS – Johnson, Wyandotte MO – Clay, Jackson, Platte
Minneapolis-St. Paul-Bloomington, MN-WI MMSA	Full	MN - Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Washington WI - Pierce, St. Croix
St. Louis, MO-IL MMSA	Full	IL – St. Clair MO – Jefferson, St. Charles, St. Louis, St. Louis City
States		
Arizona		
Phoenix-Mesa-Scottsdale, AZ MSA	Full	Maricopa
Prescott, AZ MSA	Limited	Yavapai
Tucson, AZ MSA	Limited	Pima
Florida		
North Port-Sarasota-Bradenton, FL MSA	Full	Manatee, Sarasota
Cape Coral-Fort Myers, FL MSA	Full	Lee
Naples-Immokalee-Marco Island, FL MSA	Limited	Collier
Punta Gorda, FL MSA	Limited	Charlotte
Tampa-St. Petersburg-Clearwater, FL MSA	Limited	Hillsborough
West Palm Beach-Boca Raton-Delray Beach, FL MD	Limited	Palm Beach
Illinois		
Rockford, IL MSA	Full	Boone, Winnebago
Indiana		
Indianapolis-Carmel-Anderson, IN MSA	Full	Boone, Hamilton, Hendricks, Johnson, Madison, Marion, Morgan
Kokomo, IN MSA	Limited	Howard
Non-MSA IN	Limited	Rush, Tipton, Wayne

Rating and Assessment Areas	Type of Exam	Other Information
Kansas		
Non-MSA KS	Full	Crawford
Missouri		
St. Joseph, MO-KS MSA	Full	MO – Andrew, Buchanan
Wisconsin		
Milwaukee-Waukesha-West Allis, WI MSA	Full	Milwaukee, Ozaukee, Washington, Waukesha
Green Bay, WI MSA	Full	Brown, Kewaunee, Oconto
Janesville-Beloit, WI MSA	Full	Rock
Appleton, WI MSA	Limited	Calumet, Outagamie
Duluth, MN-WI MSA	Limited	Douglas
Eau Claire, WI MSA	Limited	Chippewa, Eau Claire
Fond du Lac, WI MSA	Limited	Fond du Lac
La Crosse, WI MSA	Limited	La Crosse
Madison, WI MSA	Limited	Columbia, Dane, Iowa
Oshkosh-Neenah, WI MSA	Limited	Winnebago
Racine, WI MSA	Limited	Racine
Sheboygan, WI MSA	Limited	Sheboygan
Wausau, WI MSA	Limited	Marathon, Lincoln
Non-MSA WI	Limited	Adams, Ashland, Clark, Dodge, Dunn, Grant, Jefferson, Juneau, Langlade, Manitowoc, Marinette, Marquette, Oneida, Portage, Richland, Sauk, Shawano, Vernon, Vilas, Walworth, Waupaca, Waushara, Wood

Appendix B: Summary of MMSA and State Ratings

RATINGS BMO Harris Bank N.A.				
Overall Bank:	**Lending Test Rating***	**Investment Test Rating**	**Service Test Rating**	**Overall Bank/State/ MMSA Rating**
BMO Harris Bank N.A.	Outstanding	Outstanding	Outstanding	Outstanding
MMSA or State:				
Chicago MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Kansas City MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Minneapolis MMSA	Outstanding	Outstanding	Outstanding	Outstanding
St. Louis MMSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Arizona	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Florida	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Illinois	Outstanding	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Kansas	Outstanding	Outstanding	Outstanding	Outstanding
Missouri	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Wisconsin	Outstanding	Outstanding	Outstanding	Outstanding

* The Lending Test was weighted more heavily than the Investment and Service Tests in the overall rating.

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 low- and moderate-income 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 loans, 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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**.**

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 loans are treated the same 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 30th of each year. Tables without data are not included in this PE.

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

Table 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.

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. 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.

Chicago MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Chicago MMSA	15,822	3,027,986	100.0	271,612	4.5	2.3	3.5	17.6	10.1	15.0	35.5	33.5	35.4	42.3	53.9	45.9	0.1	0.1	0.1
Total	**15,822**	**3,027,986**	**100.0**	**271,612**	**4.5**	**2.3**	**3.5**	**17.6**	**10.1**	**15.0**	**35.5**	**33.5**	**35.4**	**42.3**	**53.9**	**45.9**	**0.1**	**0.1**	**0.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Chicago MMSA	15,822	3,027,986	100.0	271,612	23.4	9.5	7.3	16.4	18.1	17.6	18.7	22.0	21.1	41.5	42.5	37.4	0.0	8.0	16.6
Total	**15,822**	**3,027,986**	**100.0**	**271,612**	**23.4**	**9.5**	**7.3**	**16.4**	**18.1**	**17.6**	**18.7**	**22.0**	**21.1**	**41.5**	**42.5**	**37.4**	**0.0**	**8.0**	**16.6**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Chicago MMSA	11,333	1,272,180	100.0	227,975	4.9	3.3	3.9	15.3	18.0	15.9	30.2	38.3	31.8	49.1	40.3	48.2	0.4	0.1	0.2
Total	**11,333**	**1,272,180**	**100.0**	**227,975**	**4.9**	**3.3**	**3.9**	**15.3**	**18.0**	**15.9**	**30.2**	**38.3**	**31.8**	**49.1**	**40.3**	**48.2**	**0.4**	**0.1**	**0.2**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Chicago MMSA	11,333	1,272,180	100.0	227,975	83.9	44.8	43.0	6.5	35.6	9.6	19.6
Total	**11,333**	**1,272,180**	**100.0**	**227,975**	**83.9**	**44.8**	**43.0**	**6.5**	**35.6**	**9.6**	**19.6**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Chicago MMSA	62	7,447	100.0	893	3.3	0.0	0.7	14.0	4.8	4.3	40.3	69.4	58.5	42.4	25.8	36.6	0.1	0.0	0.0
Total	**62**	**7,447**	**100.0**	**893**	**3.3**	**0.0**	**0.7**	**14.0**	**4.8**	**4.3**	**40.3**	**69.4**	**58.5**	**42.4**	**25.8**	**36.6**	**0.1**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Chicago MMSA	62	7,447	100.0	893	93.7	43.5	53.0	3.8	51.6	2.5	7.7
Total	**62**	**7,447**	**100.0**	**893**	**93.7**	**43.5**	**53.0**	**3.8**	**51.6**	**2.5**	**7.7**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Kansas City MMSA	824	141,467	100.0	65,538	6.6	9.7	3.2	18.0	19.1	16.1	35.5	30.1	35.7	39.7	41.0	44.8	0.2	0.1	0.2
Total	**824**	**141,467**	**100.0**	**65,538**	**6.6**	**9.7**	**3.2**	**18.0**	**19.1**	**16.1**	**35.5**	**30.1**	**35.7**	**39.7**	**41.0**	**44.8**	**0.2**	**0.1**	**0.2**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Kansas City MMA	824	141,467	100.0	65,538	21.4	24.9	8.0	17.2	21.6	19.5	20.0	17.1	21.6	41.4	29.9	35.7	0.0	6.6	15.2
Total	**824**	**141,467**	**100.0**	**65,538**	**21.4**	**24.9**	**8.0**	**17.2**	**21.6**	**19.5**	**20.0**	**17.1**	**21.6**	**41.4**	**29.9**	**35.7**	**0.0**	**6.6**	**15.2**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Kansas City MMA	499	68,749	100.0	33,942	7.6	9.2	7.1	18.8	15.8	17.2	32.4	28.7	29.9	39.1	35.5	43.1	2.1	10.8	2.7
Total	**499**	**68,749**	**100.0**	**33,942**	**7.6**	**9.2**	**7.1**	**18.8**	**15.8**	**17.2**	**32.4**	**28.7**	**29.9**	**39.1**	**35.5**	**43.1**	**2.1**	**10.8**	**2.7**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-19
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
Full-Scope:											
Kansas City MMSA	499	68,749	100.0	33,942	83.2	38.1	43.2	6.1	42.5	10.7	19.4
Total	**499**	**68,749**	**100.0**	**33,942**	**83.2**	**38.1**	**43.2**	**6.1**	**42.5**	**10.7**	**19.4**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-19
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	
Full-Scope:																				
Kansas City MMSA	1	102	100.0	254	5.2	0.0	1.2	16.8	0.0	5.9	36.8	0.0	47.2	40.9	100.0	45.7	0.3	0.0	0.0	
Total	**1**	**102**	**100.0**	**254**	**5.2**	**0.0**	**1.2**	**16.8**	**0.0**	**5.9**	**36.8**	**0.0**	**47.2**	**40.9**	**100.0**	**45.7**	**0.3**	**0.0**	**0.0**	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19
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
Full-Scope:											
Kansas City MMSA	1	102	100.0	254	95.3	0.0	46.9	2.7	100.0	2.0	0.0
Total	**1**	**102**	**100.0**	**254**	**95.3**	**0.0**	**46.9**	**2.7**	**100.0**	**2.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Minneapolis MMSA	1,636	421,247	100.0	126,145	2.3	2.8	3.2	15.5	14.1	17.3	46.5	38.8	47.2	35.6	44.3	32.2	0.1	0.0	0.1
Total	**1,636**	**421,247**	**100.0**	**126,145**	**2.3**	**2.8**	**3.2**	**15.5**	**14.1**	**17.3**	**46.5**	**38.8**	**47.2**	**35.6**	**44.3**	**32.2**	**0.1**	**0.0**	**0.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Minneapolis MMSA	1,636	421,247	100.0	126,145	20.3	10.0	9.0	17.1	21.3	21.5	21.8	20.7	22.0	40.7	40.6	30.3	0.0	7.3	17.1
Total	**1,636**	**421,247**	**100.0**	**126,145**	**20.3**	**10.0**	**9.0**	**17.1**	**21.3**	**21.5**	**21.8**	**20.7**	**22.0**	**40.7**	**40.6**	**30.3**	**0.0**	**7.3**	**17.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Minneapolis MMSA	1,335	203,529	100.0	65,300	5.0	8.0	4.4	17.2	12.1	16.3	43.6	58.0	45.4	33.9	21.9	33.7	0.3	0.0	0.2
Total	**1,335**	**203,529**	**100.0**	**65,300**	**5.0**	**8.0**	**4.4**	**17.2**	**12.1**	**16.3**	**43.6**	**58.0**	**45.4**	**33.9**	**21.9**	**33.7**	**0.3**	**0.0**	**0.2**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Minneapolis MMSA	1,335	203,529	100.0	65,300	86.2	33.2	53.2	5.7	49.4	8.1	17.4
Total	**1,335**	**203,529**	**100.0**	**65,300**	**86.2**	**33.2**	**53.2**	**5.7**	**49.4**	**8.1**	**17.4**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Minneapolis MMSA	14	1,318	100.0	708	1.7	0.0	0.6	12.5	14.3	6.6	51.8	35.7	62.4	33.8	50.0	30.4	0.1	0.0	0.0
Total	**14**	**1,318**	**100.0**	**708**	**1.7**	**0.0**	**0.6**	**12.5**	**14.3**	**6.6**	**51.8**	**35.7**	**62.4**	**33.8**	**50.0**	**30.4**	**0.1**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Minneapolis MMSA	14	1,318	100.0	708	95.7	27.3	50.6	2.5	57.1	1.8	50.0
Total	**14**	**1,318**	**100.0**	**708**	**95.7**	**27.3**	**50.6**	**2.5**	**57.1**	**1.8**	**50.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
St. Louis MMSA	751	219,816	100.0	77,430	5.8	1.5	2.0	16.8	8.3	13.4	36.9	28.4	39.1	40.4	61.4	45.3	0.1	0.5	0.2
Total	**751**	**219,816**	**100.0**	**77,430**	**5.8**	**1.5**	**2.0**	**16.8**	**8.3**	**13.4**	**36.9**	**28.4**	**39.1**	**40.4**	**61.4**	**45.3**	**0.1**	**0.5**	**0.2**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
St. Louis MMSA	751	219,816	100.0	77,430	21.7	10.4	8.3	16.8	15.2	18.0	19.4	14.1	19.2	42.2	29.6	35.1	0.0	30.8	19.5
Total	**751**	**219,816**	**100.0**	**77,430**	**21.7**	**10.4**	**8.3**	**16.8**	**15.2**	**18.0**	**19.4**	**14.1**	**19.2**	**42.2**	**29.6**	**35.1**	**0.0**	**30.8**	**19.5**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
St. Louis MMSA	490	72,498	100.0	46,022	6.6	3.3	5.5	17.4	25.3	16.9	31.9	38.8	31.8	43.0	31.2	44.7	1.1	1.4	1.1
Total	**490**	**72,498**	**100.0**	**46,022**	**6.6**	**3.3**	**5.5**	**17.4**	**25.3**	**16.9**	**31.9**	**38.8**	**31.8**	**43.0**	**31.2**	**44.7**	**1.1**	**1.4**	**1.1**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
St. Louis MMSA	490	72,498	100.0	46,022	83.3	43.1	45.2	6.3	33.3	10.3	23.7
Total	**490**	**72,498**	**100.0**	**46,022**	**83.3**	**43.1**	**45.2**	**6.3**	**33.3**	**10.3**	**23.7**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

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
Full-Scope:																			
St. Louis MMSA	1	59	100.0	335	3.3	0.0	0.6	14.5	100.0	12.8	40.6	0.0	44.8	41.1	0.0	41.2	0.5	0.0	0.6
Total	**1**	**59**	**100.0**	**335**	**3.3**	**0.0**	**0.6**	**14.5**	**100.0**	**12.8**	**40.6**	**0.0**	**44.8**	**41.1**	**0.0**	**41.2**	**0.5**	**0.0**	**0.6**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

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
Full-Scope:											
St. Louis MMSA	1	59	100.0	335	95.3	0.0	55.8	2.8	0.0	1.9	100.0
Total	**1**	**59**	**100.0**	**335**	**95.3**	**0.0**	**55.8**	**2.8**	**0.0**	**1.9**	**100.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Phoenix MSA	2,497	690,833	85.4	190,706	4.6	2.0	4.0	18.8	11.3	15.8	34.7	27.4	35.5	41.9	59.2	44.1	0.0	0.2	0.6
Limited-Scope:																			
Prescott MSA	208	48,818	7.1	10,742	0.0	0.0	0.0	18.7	10.6	16.9	61.2	67.8	65.3	20.1	21.6	17.9	0.0	0.0	0.0
Tucson MSA	218	64,132	7.5	36,775	4.7	3.7	3.7	21.4	10.6	16.0	32.9	23.4	33.2	41.0	62.4	47.1	0.0	0.0	0.0
Total	**2,923**	**803,783**	**100.0**	**238,223**	**4.3**	**2.0**	**3.8**	**19.4**	**11.2**	**15.8**	**35.8**	**29.9**	**36.5**	**40.5**	**56.8**	**43.4**	**0.0**	**0.2**	**0.5**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Phoenix MSA	2,497	690,833	85.4	190,706	21.8	7.8	5.1	16.9	15.1	15.9	19.2	16.3	20.4	42.2	51.2	40.9	0.0	9.5	17.8
Limited-Scope:																			
Prescott MSA	208	48,818	7.1	10,742	18.8	6.3	6.0	19.3	14.4	14.9	22.4	22.6	22.9	39.6	54.3	41.6	0.0	2.4	14.6
Tucson MSA	218	64,132	7.5	36,775	22.2	5.5	5.3	17.3	16.5	14.9	19.1	20.6	19.6	41.4	50.5	39.5	0.0	6.9	20.8
Total	**2,923**	**803,783**	**100.0**	**238,223**	**21.7**	**7.5**	**5.2**	**17.1**	**15.2**	**15.7**	**19.3**	**17.1**	**20.4**	**41.9**	**51.4**	**40.7**	**0.0**	**8.8**	**18.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Phoenix MSA	1,321	170,084	87.4	104,551	6.2	34.4	6.9	15.9	14.0	16.5	28.4	20.2	26.8	48.9	31.3	49.3	0.5	0.2	0.6
Limited-Scope:																			
Prescott MSA	37	4,413	2.4	5,532	0.0	0.0	0.0	22.3	13.5	23.1	51.3	67.6	51.0	26.4	18.9	25.9	0.0	0.0	0.0
Tucson MSA	154	18,123	10.2	17,564	6.3	1.9	6.3	23.3	29.2	24.1	29.6	42.9	29.2	39.8	25.3	39.4	1.0	0.6	1.0
Total	**1,512**	**192,620**	**100.0**	**127,647**	**6.0**	**30.2**	**6.5**	**17.3**	**15.5**	**17.8**	**29.6**	**23.7**	**28.2**	**46.6**	**30.4**	**46.9**	**0.6**	**0.2**	**0.6**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Phoenix MSA	1,321	170,084	87.4	104,551	89.7	40.2	46.2	3.5	43.0	6.9	16.8
Limited-Scope:											
Prescott MSA	37	4,413	2.4	5,532	90.3	59.5	51.0	2.9	32.4	6.8	13.6
Tucson MSA	154	18,123	10.2	17,564	87.6	47.4	46.2	3.7	34.4	8.7	18.2
Total	**1,512**	**192,620**	**100.0**	**127,647**	**89.4**	**41.4**	**46.4**	**3.5**	**41.9**	**7.1**	**16.7**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-19
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
Full-Scope:																			
Phoenix MSA	10	667	66.7	357	6.1	10.0	1.7	18.0	30.0	14.3	29.4	0.0	34.2	46.2	50.0	49.3	0.3	10.0	0.6
Limited-Scope:																			
Prescott MSA	0	0	0.0	49	0.0	0.0	0.0	19.3	0.0	20.4	54.5	0.0	46.9	26.2	0.0	32.7	0.0	0.0	0.0
Tucson MSA	5	1,069	33.3	75	4.8	0.0	1.3	22.8	0.0	13.3	34.2	100.0	41.3	37.9	0.0	44.0	0.2	0.0	0.0
Total	**15**	**1,736**	**100.0**	**481**	**5.5**	**6.7**	**1.5**	**18.9**	**20.0**	**14.8**	**31.9**	**33.3**	**36.6**	**43.4**	**33.3**	**46.8**	**0.3**	**6.7**	**0.4**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19
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
Full-scope:											
Phoenix MSA	10	667	66.7	357	94.8	70.0	40.1	3.2	33.3	1.9	0.0
Limited-scope:											
Prescott MSA	0	0	0.0	49	96.5	0.0	65.3	2.0	0.0	1.5	0.0
Tucson MSA	5	1,069	33.3	75	96.3	0.0	46.7	2.6	100.0	1.1	0.0
Total	**15**	**1,736**	**100.0**	**481**	**95.2**	**46.7**	**43.7**	**3.0**	**53.3**	**1.8**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Sarasota MSA	530	142,316	50.6	33,485	1.0	0.4	0.6	18.3	18.7	13.7	50.7	38.5	46.9	29.9	42.5	38.8	0.0	0.0	0.0
Cape Coral MSA	140	49,390	13.4	30,962	2.1	0.0	1.6	18.6	3.6	20.0	44.2	31.4	45.1	35.1	65.0	33.2	0.0	0.0	0.0
Limited-Scope:																			
Naples MSA	170	87,676	16.2	14,305	2.3	0.0	1.2	16.3	8.8	16.2	41.3	31.8	42.1	40.1	59.4	40.5	0.0	0.0	0.0
Punta Gorda MSA	58	9,014	5.5	8,339	0.0	0.0	0.0	10.7	12.1	12.0	70.6	63.8	70.2	18.6	24.1	17.7	0.0	0.0	0.0
Tampa MSA	84	16,800	8.0	48,687	3.3	1.2	2.5	17.8	8.3	14.7	31.8	20.2	32.5	46.9	70.2	50.2	0.2	0.0	0.1
West Palm Beach MD	66	67,710	6.3	47,776	3.1	0.0	2.6	23.3	10.6	21.2	32.7	21.2	34.7	40.6	63.6	41.4	0.2	4.5	0.2
Total	**1,048**	**372,906**	**100.0**	**183,554**	**2.4**	**0.3**	**1.8**	**19.3**	**13.4**	**17.1**	**40.0**	**35.3**	**40.3**	**38.2**	**50.8**	**40.7**	**0.1**	**0.3**	**0.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Sarasota MSA	530	142,316	50.6	33,485	19.4	7.4	5.7	19.1	20.0	16.6	21.0	17.7	21.5	40.5	50.9	43.7	0.0	4.0	12.5
Cape Coral MSA	140	49,390	13.4	30,962	20.7	2.1	4.2	18.5	3.6	15.7	19.7	13.6	21.5	41.1	73.6	42.0	0.0	7.1	16.6
Limited-Scope:																			
Naples MSA	170	87,676	16.2	14,305	20.8	1.8	3.5	17.7	4.7	12.5	19.3	10.6	18.2	42.2	71.2	50.5	0.0	11.8	15.3
Punta Gorda MSA	58	9,014	5.5	8,339	17.3	1.7	4.7	20.7	19.0	16.3	21.8	17.2	21.7	40.2	60.3	43.1	0.0	1.7	14.2
Tampa MSA	84	16,800	8.0	48,687	21.9	2.4	3.6	16.8	15.5	14.5	17.7	17.9	19.7	43.6	56.0	43.7	0.0	8.3	18.5
West Palm Beach MD	66	67,710	6.3	47,776	22.8	1.5	5.3	17.3	3.0	15.3	17.8	7.6	20.1	42.1	66.7	44.2	0.0	21.2	15.0
Total	**1,048**	**372,906**	**100.0**	**183,554**	**21.3**	**4.7**	**4.6**	**17.8**	**13.8**	**15.2**	**18.9**	**15.4**	**20.4**	**42.0**	**59.2**	**44.0**	**0.0**	**7.0**	**15.7**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Sarasota MSA	263	30,173	22.8	23,925	1.3	2.3	1.1	19.3	29.7	18.0	44.8	40.3	43.1	34.6	27.8	37.8	0.0	0.0	0.0
Cape Coral MSA	190	20,208	16.5	20,091	2.6	1.1	2.3	22.5	55.8	22.3	40.1	27.9	38.9	34.5	15.3	36.5	0.2	0.0	0.0
Limited-Scope:																			
Naples MSA	92	13,296	8.0	12,624	2.7	4.3	2.6	13.5	12.0	10.9	39.0	27.2	39.8	44.8	56.5	46.8	0.0	0.0	0.0
Punta Gorda MSA	25	3,798	2.2	4,061	0.0	0.0	0.0	15.9	4.0	16.3	66.0	76.0	65.6	18.2	20.0	18.0	0.0	0.0	0.0
Tampa MSA	430	50,953	37.2	37,768	6.6	39.8	6.9	18.9	20.9	19.9	28.1	18.8	26.4	45.8	20.5	46.2	0.7	0.0	0.5
West Palm Beach MD	155	17,679	13.4	59,241	5.2	23.2	5.4	21.0	32.3	20.3	29.5	27.7	28.9	43.6	16.8	44.8	0.7	0.0	0.6
Total	**1,155**	**136,107**	**100.0**	**157,710**	**4.2**	**19.0**	**4.3**	**19.6**	**29.1**	**19.3**	**34.8**	**28.3**	**33.6**	**40.9**	**23.6**	**42.5**	**0.4**	**0.0**	**0.4**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Sarasota MSA	263	30,173	22.8	23,925	91.2	63.1	49.2	3.2	25.9	5.6	11.0
Cape Coral MSA	190	20,208	16.5	20,091	91.1	52.2	45.4	3.1	33.7	5.8	42.5
Limited-Scope:											
Naples MSA	92	13,296	8.0	12,624	91.8	42.4	45.9	3.1	43.5	5.2	14.1
Punta Gorda MSA	25	3,798	2.2	4,061	92.3	44.0	50.3	2.4	32.0	5.3	60.0
Tampa MSA	430	50,953	37.2	37,768	89.9	28.8	45.6	3.4	36.5	6.7	34.7
West Palm Beach MD	155	17,679	13.4	59,241	91.8	31.6	46.1	3.1	17.4	5.1	51.0
Total	**1,155**	**136,107**	**100.0**	**157,710**	**91.1**	**39.9**	**46.5**	**3.2**	**31.5**	**5.7**	**28.6**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Sarasota MSA	7	688	14.9	103	2.1	14.3	1.0	19.4	0.0	19.4	45.1	14.3	23.3	33.4	71.4	56.3	0.0	0.0	0.0
Cape Coral MSA	8	635	17.0	87	3.2	0.0	0.0	25.5	0.0	17.2	46.6	100.0	56.3	24.6	0.0	26.4	0.0	0.0	0.0
Limited-Scope:																			
Naples MSA	9	648	19.1	62	4.9	0.0	27.4	20.3	11.1	32.3	43.4	66.7	21.0	31.3	22.2	19.4	0.0	0.0	0.0
Punta Gorda MSA	0	0	0.0	19	0.0	0.0	0.0	26.4	0.0	57.9	62.0	0.0	42.1	11.6	0.0	0.0	0.0	0.0	0.0
Tampa MSA	3	136	6.4	107	4.2	0.0	2.8	19.2	0.0	17.8	34.8	66.7	38.3	41.5	33.3	41.1	0.3	0.0	0.0
West Palm Beach MSA	20	1,293	42.5	189	5.5	10.0	2.6	21.9	10.0	10.1	32.9	40.0	36.0	39.4	40.0	51.3	0.3	0.0	0.0
Total	**47**	**3,400**	**100.0**	**567**	**3.9**	**6.4**	**4.6**	**21.5**	**6.4**	**18.3**	**39.9**	**53.2**	**35.8**	**34.4**	**34.0**	**41.3**	**0.2**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Sarasota MSA	6	465	14.9	103	96.6	50.0	56.3	2.4	50.0	1.0	66.7
Cape Coral MSA	8	635	17.0	87	97.1	75.0	44.8	1.7	33.3	1.2	0.0
Limited-Scope:											
Naples MSA	9	648	19.1	62	95.1	77.8	56.5	3.4	22.2	1.5	0.0
Punta Gorda MSA	0	0	0.0	19	97.6	0.0	57.9	0.7	0.0	1.6	0.0
Tampa MSA	3	136	6.4	107	95.7	100.0	56.1	2.9	0.0	1.4	100.0
West Palm Beach MD	20	1,293	42.5	189	96.3	70.0	46.6	2.5	20.0	1.1	16.7
Total	**47**	**3,400**	**100.0**	**567**	**96.3**	**68.1**	**51.3**	**2.4**	**22.7**	**1.2**	**10.6**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Rockford MSA	596	54,860	100.0	9,269	5.1	2.9	2.8	15.9	12.4	13.6	33.5	33.6	36.1	45.4	51.2	47.5	0.0	0.0	0.1
Total	**596**	**54,860**	**100.0**	**9,269**	**5.1**	**2.9**	**2.8**	**15.9**	**12.4**	**13.6**	**33.5**	**33.6**	**36.1**	**45.4**	**51.2**	**47.5**	**0.0**	**0.0**	**0.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Rockford MSA	596	54,860	100.0	9,269	21.9	11.7	9.9	17.0	26.2	19.5	20.4	22.5	21.8	40.7	36.7	26.7	0.0	2.9	22.1
Total	**596**	**54,860**	**100.0**	**9,269**	**21.9**	**11.7**	**9.9**	**17.0**	**26.2**	**19.5**	**20.4**	**22.5**	**21.8**	**40.7**	**36.7**	**26.7**	**0.0**	**2.9**	**22.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Rockford MSA	162	16,677	100.0	4,292	8.8	3.7	8.5	15.4	19.8	16.1	28.6	29.6	29.2	45.0	45.1	43.7	2.2	1.9	2.5
Total	**162**	**16,677**	**100.0**	**4,292**	**8.8**	**3.7**	**8.5**	**15.4**	**19.8**	**16.1**	**28.6**	**29.6**	**29.2**	**45.0**	**45.1**	**43.7**	**2.2**	**1.9**	**2.5**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Rockford MSA	162	16,677	100.0	4,292	80.0	52.5	43.5	7.2	24.1	12.8	23.5
Total	**162**	**16,677**	**100.0**	**4,292**	**80.0**	**52.5**	**43.5**	**7.2**	**24.1**	**12.8**	**23.5**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Rockford MSA	19	3,725	100.0	131	3.2	0.0	0.0	10.9	0.0	0.8	33.0	26.3	29.0	52.3	73.7	70.2	0.6	0.0	0.0
Total	**19**	**3,725**	**100.0**	**131**	**3.2**	**0.0**	**0.0**	**10.9**	**0.0**	**0.8**	**33.0**	**26.3**	**29.0**	**52.3**	**73.7**	**70.2**	**0.6**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Rockford MSA	19	3,725	100.0	131	95.5	10.0	51.9	2.9	78.9	1.5	30.0
Total	**19**	**3,725**	**100.0**	**131**	**95.5**	**10.0**	**51.9**	**2.9**	**78.9**	**1.5**	**30.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Indianapolis MSA	2,182	259,624	85.8	70,557	6.8	4.9	4.5	18.1	15.1	15.4	35.1	30.6	34.1	39.9	49.4	46.0	0.1	0.0	0.0
Limited-Scope:																			
Kokomo MSA	281	22,686	11.0	2,628	6.3	2.5	4.8	14.2	10.7	8.8	48.7	53.4	52.2	30.8	33.5	34.2	0.0	0.0	0.0
Non-MSA IN	81	5,359	3.2	2,213	1.4	0.0	0.8	22.9	22.2	20.5	63.6	51.9	66.8	12.0	25.9	11.9	0.0	0.0	0.0
Total	**2,544**	**287,669**	**100.0**	**75,398**	**6.4**	**4.5**	**4.4**	**18.2**	**14.8**	**15.3**	**37.5**	**33.8**	**35.7**	**37.8**	**46.9**	**44.6**	**0.1**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Indianapolis MSA	2,182	259,624	85.8	70,557	22.3	15.5	10.3	17.3	23.6	20.4	19.3	22.4	20.3	41.1	34.5	34.1	0.0	3.9	15.0
Limited-Scope																			
Kokomo MSA	281	22,686	11.0	2,628	22.2	14.6	10.7	16.6	29.5	22.6	21.1	24.2	23.7	40.0	29.5	25.5	0.0	2.1	17.5
Non-MSA IN	81	5,359	3.2	2,213	22.9	12.3	11.5	19.7	27.2	24.7	19.8	29.6	23.7	37.6	30.9	26.0	0.0	0.0	14.2
Total	**2,544**	**287,669**	**100.0**	**75,398**	**22.3**	**15.3**	**10.3**	**17.4**	**24.4**	**20.6**	**19.4**	**22.8**	**20.5**	**40.8**	**33.8**	**33.5**	**0.0**	**3.6**	**15.1**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Indianapolis MSA	1,125	169,210	95.6	31,479	9.9	8.9	8.2	20.3	11.9	17.5	30.4	37.9	30.2	39.3	41.3	43.8	0.1	0.0	0.2
Limited-Scope:																			
Kokomo MSA	27	4,457	2.3	775	11.5	14.8	11.0	18.9	7.4	18.3	45.6	44.4	45.5	23.9	33.3	25.2	0.0	0.0	0.0
Non-MSA IN	25	2,381	2.1	1,273	8.1	0.0	6.1	23.4	12.0	20.9	60.2	80.0	63.9	8.3	8.0	9.1	0.0	0.0	0.0
Total	**1,177**	**176,048**	**100.0**	**33,527**	**9.9**	**8.8**	**8.2**	**20.4**	**11.8**	**17.7**	**32.0**	**38.9**	**31.9**	**37.6**	**40.4**	**42.1**	**0.1**	**0.0**	**0.2**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope											
Indianapolis MSA	1,125	169,210	95.6	31,479	85.1	47.1	41.7	5.2	39.5	9.8	13.4
Limited-Scope:											
Kokomo MSA	27	4,457	2.3	775	80.9	51.9	48.0	4.4	40.7	14.8	12.5
Non-MSA IN	25	2,381	2.1	1,273	80.2	48.0	50.5	5.4	40.0	14.4	42.9
Total	**1,177**	**176,048**	**100.0**	**33,527**	**84.7**	**47.2**	**42.2**	**5.2**	**39.5**	**10.1**	**13.3**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-19
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
Full-Scope:																			
Indianapolis MSA	17	1,087	94.4	396	5.1	0.0	0.5	13.2	5.9	3.5	44.4	52.9	67.4	37.2	41.2	28.5	0.2	0.0	0.0
Limited-Scope:																			
Kokomo MSA	0	0	0.0	122	2.4	0.0	0.0	6.0	0.0	0.0	47.2	0.0	59.8	44.4	0.0	40.2	0.0	0.0	0.0
Non-MSA IN	1	23	5.6	442	0.1	0.0	0.2	5.8	0.0	1.1	66.9	100.0	76.7	27.2	0.0	21.9	0.0	0.0	0.0
Total	**18**	**1,110**	**100.0**	**960**	**4.3**	**0.0**	**0.3**	**11.8**	**5.6**	**2.0**	**47.6**	**55.6**	**70.7**	**36.2**	**38.9**	**27.0**	**0.1**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19
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
Full-Scope:											
Indianapolis MSA	17	1,087	94.5	396	95.9	64.7	53.8	2.3	50.0	1.8	14.3
Limited-Scope:											
Kokomo MSA	0	0	0.0	122	98.8	0.0	61.5	0.8	0.0	0.4	0.0
Non-MSA IN	1	23	5.5	361	98.1	100.0	70.4	0.9	0.0	0.9	0.0
Total	**18**	**1,110**	**100.0**	**879**	**96.3**	**66.7**	**61.7**	**2.1**	**45.5**	**1.6**	**14.3**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Non-MSA KS	23	1,841	100.0	673	0.0	0.0	0.0	8.8	21.7	10.0	78.8	52.2	71.0	12.4	26.1	19.0	0.0	0.0	0.0
Total	**23**	**1,841**	**100.0**	**673**	**0.0**	**0.0**	**0.0**	**8.8**	**21.7**	**10.0**	**78.8**	**52.2**	**71.0**	**12.4**	**26.1**	**19.0**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Non-MSA KS	23	1,841	100.0	673	22.2	13.0	8.5	17.3	21.7	16.8	22.9	30.4	17.8	37.6	30.4	33.1	0.0	4.3	23.8
Total	**23**	**1,841**	**100.0**	**673**	**22.2**	**13.0**	**8.5**	**17.3**	**21.7**	**16.8**	**22.9**	**30.4**	**17.8**	**37.6**	**30.4**	**33.1**	**0.0**	**4.3**	**23.8**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Non-MSA KS	9	331	100.0	368	0.0	0.0	0.0	24.4	55.6	23.4	59.9	22.2	59.2	15.6	22.2	17.4	0.0	0.0	0.0
Total	**9**	**331**	**100.0**	**368**	**0.0**	**0.0**	**0.0**	**24.4**	**55.6**	**23.4**	**59.9**	**22.2**	**59.2**	**15.6**	**22.2**	**17.4**	**0.0**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Non-MSA KS	9	331	100.0	368	76.3	87.5	48.4	7.6	100.0	16.2	25.0
Total	**9**	**331**	**100.0**	**368**	**76.3**	**87.5**	**48.4**	**7.6**	**100.0**	**16.2**	**25.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
St. Joseph MMSA	34	3,577	100.0	2,483	0.7	0.0	0.4	18.2	8.8	15.8	52.7	50.0	51.8	28.4	41.2	31.9	0.0	0.0	0.0
Total	**34**	**3,577**	**100.0**	**2,483**	**0.7**	**0.0**	**0.4**	**18.2**	**8.8**	**15.8**	**52.7**	**50.0**	**51.8**	**28.4**	**41.2**	**31.9**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
St. Joseph MMSA	34	3,577	100.0	2,483	21.0	2.9	8.6	17.6	38.2	20.2	22.8	23.5	23.3	38.5	32.4	30.7	0.0	2.9	17.3
Total	**34**	**3,577**	**100.0**	**2,483**	**21.0**	**2.9**	**8.6**	**17.6**	**38.2**	**20.2**	**22.8**	**23.5**	**23.3**	**38.5**	**32.4**	**30.7**	**0.0**	**2.9**	**17.3**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
St. Joseph MMSA	18	1,411	100.0	1,209	6.4	5.6	5.8	15.4	16.7	14.5	45.5	44.4	45.2	32.7	33.3	34.5	0.0	0.0	0.0
Total	**18**	**1,411**	**100.0**	**1,209**	**6.4**	**5.6**	**5.8**	**15.4**	**16.7**	**14.5**	**45.5**	**44.4**	**45.2**	**32.7**	**33.3**	**34.5**	**0.0**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
St. Joseph MMSA	18	1,411	100.0	1,209	78.0	61.1	46.9	6.6	33.3	15.5	50.0
Total	**18**	**1,411**	**100.0**	**1,209**	**78.0**	**61.1**	**46.9**	**6.6**	**33.3**	**15.5**	**50.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Milwaukee MSA	5,047	845,037	36.1	47,498	7.3	3.5	4.1	11.9	9.5	11.1	36.2	36.4	37.2	44.5	50.5	47.5	0.0	0.0	0.0
Green Bay MSA	1,150	148,784	8.2	10,763	0.9	0.5	1.2	19.8	19.1	19.2	54.7	53.9	50.8	24.6	26.4	28.7	0.0	0.0	0.0
Janesville MSA	507	49,170	3.6	5,806	0.8	1.6	1.0	21.4	15.0	18.5	46.2	44.8	46.3	31.7	38.7	34.2	0.0	0.0	0.0
Limited-Scope:																			
Appleton MSA	624	90,235	4.5	8,609	0.0	0.0	0.0	9.2	7.7	8.8	81.4	80.0	81.3	9.4	12.3	9.9	0.0	0.0	0.0
Duluth MSA	58	4,458	0.4	1,230	5.8	3.4	5.9	10.8	10.3	10.9	65.0	69.0	63.2	18.4	17.2	20.0	0.0	0.0	0.0
Eau Claire MSA	198	26,470	1.4	5,199	0.0	0.0	0.0	11.4	6.6	13.0	77.3	78.3	75.8	11.3	15.2	11.2	0.0	0.0	0.0
Fond du Lac MSA	261	35,100	1.9	2,605	1.2	2.3	1.7	2.5	2.3	2.9	87.1	85.1	85.8	9.2	10.3	9.6	0.0	0.0	0.0
La Crosse MSA	132	13,152	0.9	3,573	0.4	0.0	1.0	7.8	10.6	9.2	68.2	72.7	67.1	23.2	16.7	22.1	0.4	0.0	0.6
Madison MSA	1,387	269,681	9.9	24,597	0.7	0.6	0.9	11.0	9.2	10.1	60.8	53.4	59.2	27.5	36.6	29.7	0.0	0.1	0.1
Oshkosh MSA	317	46,198	2.3	5,402	0.0	0.0	0.0	9.9	11.7	11.5	62.5	54.9	60.0	27.6	33.4	28.6	0.0	0.0	0.0
Racine MSA	460	50,431	3.3	6,431	2.7	1.1	1.4	16.1	14.1	15.5	57.4	53.9	59.3	23.6	30.9	23.6	0.2	0.0	0.3
Sheboygan MSA	406	46,493	2.9	3,495	0.0	0.0	0.0	7.7	7.1	7.6	76.3	79.3	75.5	15.9	13.5	16.9	0.0	0.0	0.0
Wausau MSA 17-18	197	22,437	1.4	4,114	0.9	1.0	0.9	9.1	13.7	10.4	78.0	67.0	73.8	12.1	18.3	14.9	0.0	0.0	0.0
Wausau MSA 19	169	14,314	1.2	4,881	0.7	1.2	0.8	9.3	11.2	10.5	73.2	64.5	73.8	16.9	23.1	14.9	0.0	0.0	0.0
Non-MSA WI 17-18	2,141	269,153	15.3	31,156	0.0	0.0	0.0	8.2	13.2	8.2	77.4	73.3	76.9	14.4	13.5	14.8	0.0	0.0	0.0
Non-MSA WI 19	935	103,358	6.7	30,389	0.0	0.0	0.0	8.1	10.7	8.2	76.1	73.3	77.0	15.8	16.0	14.8	0.0	0.0	0.0
Total	**13,989**	**2,034,470**	**100.0**	**195,748**	**2.5**	**1.6**	**1.6**	**11.2**	**11.1**	**11.1**	**59.6**	**54.9**	**58.2**	**26.7**	**32.5**	**29.0**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

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
Full-Scope:																			
Milwaukee MSA	5,047	845,037	29.0	47,498	23.5	12.3	7.6	16.2	20.0	18.1	19.4	21.3	22.5	40.9	41.1	40.8	0.0	5.4	11.1
Green Bay MSA	1,150	148,784	6.6	10,763	19.8	13.6	10.3	18.4	28.5	21.4	22.0	24.0	22.8	39.8	31.2	33.6	0.0	2.7	12.0
Janesville MSA	507	49,170	2.9	5,806	20.7	10.5	9.3	18.2	24.1	19.9	21.6	28.2	25.5	39.6	32.9	32.6	0.0	4.3	12.7
Limited Scope:																			
Appleton MSA	624	90,235	4.5	8,609	18.2	10.4	9.3	18.6	22.1	23.2	24.9	22.8	24.5	38.3	39.6	32.3	0.0	5.1	10.7
Duluth MSA	58	4,458	0.4	1,230	22.5	13.8	9.2	18.8	22.4	21.5	22.6	43.1	22.0	36.1	19.0	30.6	0.0	1.7	16.7
Eau Claire MSA	198	26,470	1.4	5,199	18.6	8.6	8.5	18.5	27.8	21.8	24.2	20.7	24.4	38.7	40.4	34.3	0.0	2.5	11.0
Fond du Lac MSA	261	35,100	1.9	2,605	17.0	14.2	11.8	18.4	30.7	25.1	25.2	22.6	23.6	39.4	29.9	28.1	0.0	2.7	11.4
La Crosse MSA	132	13,152	0.9	3,573	18.3	12.9	7.8	18.9	34.1	19.7	22.1	24.2	24.1	40.6	28.0	37.3	0.0	0.8	11.2
Madison MSA	1,387	269,681	9.9	24,597	19.5	11.0	7.7	17.4	20.6	19.2	23.3	22.9	26.6	39.8	41.2	39.7	0.0	4.3	6.8
Oshkosh MSA	317	46,198	2.3	5,402	18.6	9.5	9.4	18.4	22.1	22.9	24.0	23.0	22.9	39.0	42.0	32.5	0.0	3.5	12.4
Racine MSA	460	50,431	3.3	6,431	20.0	12.4	12.5	17.8	23.9	20.6	21.9	22.0	21.8	40.3	37.6	32.0	0.0	4.1	13.0
Sheboygan MSA	406	46,493	2.9	3,495	17.7	11.1	9.0	18.4	26.8	24.2	25.6	27.6	25.5	38.3	32.8	30.6	0.0	1.7	10.7
Wausau MSA 17-18	197	22,437	1.4	4,114	18.4	16.2	10.3	18.9	24.9	21.7	23.0	23.9	22.8	39.7	32.5	32.7	0.0	2.5	12.5
Wausau MSA 19	169	14,314	1.2	4,881	18.1	15.4	9.9	18.8	22.5	21.9	23.3	26.6	23.2	39.8	33.7	32.9	0.0	1.8	12.1
Non-MSA WI 17-18	2,141	269,153	15.3	31,156	17.5	10.7	8.3	19.2	24.4	20.9	23.2	23.5	22.6	40.1	38.6	37.2	0.0	2.8	11.0
Non-MSA WI 19	935	103,358	6.7	30,389	17.5	10.1	8.3	19.3	21.2	20.8	23.1	24.9	22.5	40.1	40.7	37.3	0.0	3.1	11.0
Total	**13,989**	**2,034,470**	**100.0**	**160,478**	**20.1**	**11.7**	**8.6**	**17.8**	**22.7**	**20.1**	**22.1**	**23.1**	**23.6**	**40.0**	**38.5**	**37.0**	**0.0**	**4.0**	**10.7**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Milwaukee MSA	2,064	318,694	45.8	28,731	10.9	7.9	8.2	11.9	11.5	10.0	35.0	36.9	34.1	42.2	43.7	47.7	0.0	0.0	0.0
Green Bay MSA	376	52,466	8.4	5,230	2.8	2.9	2.7	24.9	48.4	24.9	49.9	33.8	47.0	22.4	14.9	25.4	0.0	0.0	0.0
Janesville MSA	134	19,920	3.0	1,659	1.3	2.2	1.4	26.4	30.6	22.4	38.1	37.3	38.9	34.2	29.9	37.3	0.0	0.0	0.0
Limited-Scope:																			
Appleton MSA	227	43,010	5.0	3,372	0.0	0.0	0.0	10.5	8.4	10.1	81.7	89.9	80.0	7.8	1.8	9.9	0.0	0.0	0.0
Duluth MSA	13	1,688	0.3	417	28.3	53.8	30.7	8.7	7.7	9.4	51.2	38.5	48.9	11.8	0.0	11.0	0.0	0.0	0.0
Eau Claire MSA	62	9,775	1.4	1,968	0.0	0.0	0.0	18.5	9.7	14.7	70.7	77.4	72.5	10.8	12.9	12.8	0.0	0.0	0.0
Fond du Lac MSA	43	4,314	1.0	1,342	9.1	0.0	6.9	5.2	2.3	3.3	78.1	95.3	80.0	7.5	2.3	9.8	0.0	0.0	0.0
La Crosse MSA	111	11,685	2.5	1,200	11.7	1.8	9.3	17.1	2.7	14.5	56.6	87.4	60.3	13.6	8.1	15.5	1.1	0.0	0.4
Madison MSA	352	47,694	7.8	9,285	2.2	1.7	1.4	15.2	15.3	14.1	50.9	49.7	51.2	29.7	32.4	31.8	2.0	0.9	1.5
Oshkosh MSA	81	9,495	1.8	2,057	0.0	0.0	0.0	18.0	21.0	17.5	57.2	54.3	54.5	24.8	24.7	28.0	0.0	0.0	0.0
Racine MSA	142	17,690	3.2	2,936	5.3	9.2	4.2	18.7	9.9	16.9	53.4	50.0	54.3	19.7	25.4	21.4	2.9	5.6	3.2
Sheboygan MSA	56	6,649	1.2	1,639	0.0	0.0	0.0	16.6	23.2	14.0	67.7	62.5	70.7	15.7	14.3	15.3	0.0	0.0	0.0
Wausau MSA 17-18	68	10,823	1.5	1,956	6.8	5.9	5.3	10.6	10.3	7.9	70.6	72.1	75.4	12.0	11.8	11.5	0.0	0.0	0.0
Wausau MSA 19	38	6,725	0.8	2,305	5.6	7.9	4.5	10.6	2.6	8.1	68.7	76.3	75.7	15.1	13.2	11.7	0.0	0.0	0.0
Non-MSA WI 17-18	547	77,209	12.2	13,330	0.0	0.0	0.0	10.1	16.1	9.7	77.2	70.2	74.7	12.5	13.7	15.5	0.1	0.0	0.1
Non-MSA WI 19	188	21,289	4.2	12,981	0.0	0.0	0.0	9.8	4.8	9.7	75.7	76.6	74.7	14.4	18.6	15.6	0.1	0.0	0.1
Total	**4,502**	**659,125**	**100.0**	**90,408**	**5.0**	**4.7**	**4.3**	**13.7**	**15.4**	**12.4**	**54.4**	**50.3**	**52.0**	**26.4**	**29.3**	**31.0**	**0.5**	**0.3**	**0.3**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Milwaukee MSA	2,064	318,694	45.8	28,731	80.7	47.1	44.9	8.3	42.5	11.0	10.3
Green Bay MSA	376	52,466	8.4	5,230	79.4	40.4	46.7	7.7	46.3	12.9	19.1
Janesville MSA	134	19,920	3.0	1,659	80.5	56.7	44.4	6.3	29.9	13.2	18.0
Limited-Scope:											
Appleton MSA	227	43,010	5.0	3,372	77.2	42.7	46.2	7.9	51.1	14.9	8.1
Duluth MSA	13	1,688	0.3	417	76.0	69.2	48.0	7.9	30.0	16.1	16.7
Eau Claire MSA	62	9,775	1.4	1,968	80.4	51.6	45.9	6.4	32.3	13.3	20.0
Fond du Lac MSA	43	4,314	1.0	1,342	78.7	67.4	51.5	7.0	25.6	14.2	10.0
La Crosse MSA	111	11,685	2.5	1,200	76.6	19.8	44.3	8.0	58.6	15.4	30.8
Madison MSA	352	47,694	7.8	9,285	82.0	59.4	48.5	6.3	33.2	11.7	7.4
Oshkosh MSA	81	9,495	1.8	2,057	78.4	58.0	44.8	7.1	37.0	14.5	6.6
Racine MSA	142	17,690	3.2	2,936	82.4	52.8	43.2	6.7	37.3	10.9	15.1
Sheboygan MSA	56	6,649	1.2	1,639	79.0	76.8	54.0	7.8	23.2	13.2	0.0
Wausau MSA 17-18	68	10,823	1.5	1,956	76.6	63.2	49.4	8.3	25.0	15.1	11.8
Wausau MSA 19	38	6,725	0.8	2,305	78.6	55.3	49.2	7.4	44.7	14.1	0.0
Non-MSA WI 17-18	547	77,209	12.2	13,330	78.4	52.7	48.5	6.9	29.1	14.7	18.3
Non-MSA WI 19	188	21,289	4.2	12,981	80.0	63.3	48.5	6.4	32.4	13.6	4.3
Total	**4,502**	**659,125**	**100.0**	**90,408**	**80.2**	**49.6**	**46.5**	**7.3**	**39.4**	**12.5**	**11.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

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
Full-Scope:																			
Milwaukee MSA	53	7,826	5.0	170	5.7	1.9	1.8	7.0	0.0	1.2	38.2	60.4	49.4	49.1	37.7	47.6	0.0	0.0	0.0
Green Bay MSA	61	7,842	5.8	212	0.6	0.0	0.0	14.9	0.0	9.4	57.1	73.8	67.0	27.5	26.2	23.6	0.0	0.0	0.0
Janesville MSA	41	8,522	3.9	147	0.8	0.0	0.0	7.9	0.0	0.7	41.5	41.5	39.5	49.8	58.5	59.9	0.0	0.0	0.0
Limited-Scope:																			
Appleton MSA	70	12,682	6.7	160	0.0	0.0	0.0	8.4	5.7	5.0	84.9	90.0	91.3	6.7	4.3	3.8	0.0	0.0	0.0
Duluth MSA	0	0	0.0	9	5.1	0.0	0.0	8.5	0.0	0.0	86.4	0.0	88.9	0.0	0.0	11.1	0.0	0.0	0.0
Eau Claire MSA	48	11,027	4.6	139	0.0	0.0	0.0	13.7	10.4	18.7	78.2	83.3	71.2	8.1	6.3	10.1	0.0	0.0	0.0
Fond du Lac MSA	27	3,186	2.6	131	1.4	0.0	1.5	0.7	0.0	0.0	88.1	100.0	81.7	9.8	0.0	16.8	0.0	0.0	0.0
La Crosse MSA	10	2,476	1.0	29	1.2	10.0	3.4	4.3	0.0	3.4	76.4	90.0	79.3	17.7	0.0	13.8	0.4	0.0	0.0
Madison MSA	84	16,087	8.0	369	0.5	0.0	0.5	10.4	6.0	13.6	62.7	63.1	68.3	26.2	31.0	17.6	0.2	0.0	0.0
Oshkosh MSA	15	2,081	1.4	53	0.0	0.0	0.0	6.9	0.0	0.0	68.1	73.3	60.4	25.1	26.7	39.6	0.0	0.0	0.0
Racine MSA	8	476	0.8	68	1.5	0.0	0.0	6.8	0.0	0.0	56.7	37.5	48.5	35.0	62.5	51.5	0.0	0.0	0.0
Sheboygan MSA	12	1,740	1.1	125	0.0	0.0	0.0	2.7	0.0	0.0	74.6	100.0	72.0	22.7	0.0	28.0	0.0	0.0	0.0
Wausau MSA 17-18	32	3,598	3.0	188	0.2	0.0	0.0	1.9	0.0	2.1	93.2	100.0	97.3	4.8	0.0	0.5	0.0	0.0	0.0
Wausau MSA 19	8	758	0.8	211	0.2	0.0	0.0	2.9	0.0	1.9	85.7	100.0	91.9	11.3	0.0	6.2	0.0	0.0	0.0
Non-MSA WI 17-18	484	84,932	46.0	1,649	0.0	0.0	0.0	3.4	2.1	1.9	84.0	85.7	87.1	12.6	12.2	11.0	0.0	0.0	0.0
Non-MSA WI 19	99	19,249	9.4	1,626	0.0	0.0	0.0	3.2	1.0	1.9	82.0	89.9	85.4	14.8	9.1	12.7	0.0	0.0	0.0
Total	**1,052**	**182,482**	**100.0**	**3,449**	**1.0**	**0.2**	**0.2**	**6.5**	**2.4**	**4.1**	**69.6**	**81.4**	**78.1**	**22.9**	**16.1**	**17.5**	**0.0**	**0.0**	**0.0**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

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
Full-Scope:											
Milwaukee MSA	53	7,826	5.0	170	93.6	37.7	47.1	4.4	62.3	2.1	0.0
Green Bay MSA	61	7,842	5.8	212	94.2	60.7	40.1	4.5	29.5	1.3	15.0
Janesville MSA	41	8,522	3.9	147	96.4	29.3	54.4	2.4	56.1	1.2	16.7
Limited-Scope:											
Appleton MSA	70	12,682	6.7	160	95.2	54.3	36.3	3.2	35.7	1.5	12.3
Duluth MSA	0	0	0.0	9	96.6	0.0	77.8	1.7	0.0	1.7	0.0
Eau Claire MSA	48	11,027	4.6	139	96.9	39.6	33.8	2.4	60.4	0.7	0.0
Fond du Lac MSA	27	3,186	2.6	131	95.1	59.3	46.6	4.5	37.0	0.5	11.1
La Crosse MSA	10	2,476	1.0	29	95.3	0.0	34.5	2.4	100.0	2.4	0.0
Madison MSA	84	16,087	8.0	369	96.0	35.7	45.3	2.2	59.5	1.8	6.2
Oshkosh MSA	15	2,081	1.4	53	97.1	86.7	30.2	2.4	25.0	0.5	12.5
Racine MSA	8	476	0.8	68	94.9	75.0	55.9	3.4	0.0	1.7	28.6
Sheboygan MSA	12	1,740	1.1	125	92.7	100.0	39.2	6.0	0.0	1.2	0.0
Wausau MSA 17-18	32	3,598	3.0	188	97.3	81.3	44.1	2.1	9.4	0.7	9.4
Wausau MSA 19	8	758	0.8	211	97.0	87.5	45.0	2.4	12.5	0.6	0.0
Non-MSA WI 17-18	484	84,932	46.0	1,649	95.3	44.4	35.3	3.2	49.2	1.5	6.4
Non-MSA WI 19	99	19,249	9.4	1,626	95.5	44.4	35.1	3.1	55.6	1.3	0.0
Total	**1,052**	**182,482**	**100.0**	**3,449**	**95.3**	**47.1**	**39.5**	**3.2**	**47.1**	**1.4**	**5.8**

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0