



Office of the
Comptroller of the Currency

Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

July 16, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Associated Bank, National Association
Charter Number 23695

200 North Adams Street
Green Bay, WI 54301

Office of the Comptroller of the Currency

Midsized Bank Supervision
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Chicago, IL 60605

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

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Overall CRA Rating

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

The following table indicates the performance level of Associated Bank National Association (ABNA). With respect to the Lending, Investment, and Service Tests:

Performance Levels	Associated Bank, National Association		
	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank exhibits a good distribution of loans among geographies of different income levels in consideration of product lines offered. The bank also exhibits a good geographic distribution of home mortgage products throughout their assessment areas (AA).
- The bank's overall geographic distribution of loans is good as evidenced by overall good small loans to businesses performance and good home mortgage performance.
- A high percentage of loans are in the bank's AAs. ABNA's lending volumes are sufficient to help meet the credit needs of their AAs.
- The bank has a significant level of qualified community development investments and exhibits good responsiveness to community needs. Investments supported various affordable housing and economic development programs.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA. Bank products and services do not vary significantly between AAs.
- The bank provides a relatively high level of community development (CD) services. CD services are responsive to community needs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division (MD): As defined by Office of Management and Budget, a county or group of counties within a 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 (MSA): 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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.

Description of Institution

ABNA is a midsize, interstate bank headquartered in Green Bay, Wisconsin and is a subsidiary of Associated Banc-Corp. ABNA conducts business in the states of Wisconsin, Illinois, and Minnesota with commercial financial services in Indiana, Michigan, Missouri, Ohio, and Texas. ABNA is a full-service bank with 211 full-service banking offices and 248 deposit-taking Automated Teller Machines (ATMs) which serve the various communities throughout Wisconsin, Illinois, and Minnesota.

As of December 2017, ABNA had \$30.42 billion in assets with total loans and leases of \$20.87 billion. The loan portfolio primarily consists of 40.80 percent one-to-four family and 23.35 percent commercial and industrial. The bank had \$22.93 billion in total deposits and Tier 1 capital of \$2.36 billion.

ABNA offers a full range of loan and deposit products to businesses and individuals, including alternative retail services such as direct deposit and access to electronic banking services (bill payment, mobile banking, and electronic statements). The bank also offers free ATM transactions through the MoneyPass program throughout the AA. The bank offers a standard loan product mix including residential mortgages and commercial loans, as well as treasury management and insurance services, private banking, retirement plan services, and asset management. ABNA has ten Loan Production Offices (LPOs), which serve the bank's AAs. The LPOs are located in LMI census tracts, fully accessible to all populations, including LMI, within the AA. Each LPO has an ATM and is staffed with a loan officer.

ABNA continues to expand its presence through the acquisition of organizations within its various marketplaces. In October 2017, the bank acquired Whitnell and Company, a wealth management firm in Oak Brook, Illinois.

There are no known legal, financial, or other factors impeding ABNA's ability to help meet the credit needs of its AAs.

The CRA rating for ABNA will include state ratings for Illinois, Minnesota, Wisconsin and Multistate ratings for Chicago and Minneapolis. The bank received a Satisfactory rating on its prior CRA Performance Evaluation dated July 27, 2015.

The following table provides bank financial information as of December 31, 2016 and December 31, 2017.

Financial Information					
As of: 12/31/2017	12/31/2016		12/31/2017		% Growth / Decline in Period
Loan Mix	Balance Sheet \$ Amount (000)	% of Total Loans	Balance Sheet \$ Amount (000)	% of Total Loans	
1-4 Family Residential Loans	7,371,728	36.49	8,513,618	40.80	15.49
Multifamily Residential Loans	1,027,541	5.08	952,473	4.56	-7.30
Nonfarm Nonresidential Loans	3,443,302	17.05	3,163,591	15.16	-8.13
Commercial & Industrial Loans	4,961,780	24.56	4,873,181	23.35	-1.79
Farmland and Agricultural Loans	4,998	--	1,520	--	--
Construction and Development	1,433,243	7.09	1,451,684	6.95	1.26
Consumer Loans	393,364	1.95	385,471	1.84	-2.04
All Other Loans	1,563,577	7.74	1,526,391	7.31	-2.37
Liabilities & Capital (000s)					
Total Assets	29,070,880		30,422,051		4.65
Total Deposits	22,286,041		22,927,676		2.88
Tier 1 Capital	2,298,812		2,357,354		2.57

Scope of the Evaluation

Evaluation Period/Products Evaluated

For this evaluation, we analyzed home purchase, home improvement, and home refinance mortgage loans that ABNA reported under the HMDA and small loans to businesses the bank reported under the CRA, for the period January 1, 2015 through December 31, 2017. Primary loan products, for the purposes of this review, are products in which the bank originated at least 20 loans within the AA during one or more of the analysis periods within the overall evaluation period. Due to the changes from the 2015 U.S. Census American Community Survey (ACS), we performed separate analyses of 2015 through 2016 data to evaluate bank performance under the lending tests based on geographic distribution and borrower distribution. That data was compared to ABNA's 2017 performance data. CD loans, services, and investments were reviewed for the period of July 28, 2015 through December 31, 2017. The bank did not originate enough small farm loans in any of their AAs throughout the evaluation period to be considered a primary loan product. As a result, we did not analyze small farm lending as part of this evaluation. The Milwaukee MSA was the only AA that had at least 20 multifamily loans. Therefore, we only considered multifamily performance in the Milwaukee MSA for the period of 2015 through 2016. When evaluating the service test, we considered alternative delivery systems, but placed no significant emphasis on them, as the bank did not maintain metrics to determine their effectiveness in helping to meet the credit needs of LMI individuals.

Performance Tables 1 through 15 in appendix D include the data covered by the analysis periods.

Selection of Areas for Full-Scope Review

We completed a full-scope review for at least one AA in each state where the bank has an office. In addition, we completed a full-scope review of performance within the Multistate Metropolitan Statistical Area (MMSA) where the bank operates branches in at least two states within the MMSA. Full-scope reviews consider quantitative, qualitative, and performance context factors. We selected AAs that represent a significant portion of the bank's deposit base and lending business in that state for full-scope reviews. Other AAs that provide less than a significant portion of the bank's overall deposit or lending performance in each state were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Refer to the "Scope" section under each state and MMSA rating section for details regarding how the areas were selected.

Inside/Outside Ratio

This ratio is a bank-wide calculation and is not calculated by individual rating area or AA. The analysis is limited to bank originations and purchases and does not include any affiliate data. For the combined three-year evaluation period, ABNA originated a majority of all loan products inside the bank's AAs. ABNA originated 84.03 percent of all home mortgage and small loans to business within its AAs. The percentage by number of loans made inside the AAs by loan type are as follows: 82.98 percent mortgages loans, and 95.30 percent of small loans to businesses.

Ratings

The bank's overall rating is a blend of the MMSA and state ratings, based primarily on results in those areas that received full-scope reviews. The state of Wisconsin received the greatest weight in our conclusions because it represents the bank's most significant market in terms of deposit concentration, branch distribution, and loan originations. As of June 30, 2017, 67.21 percent of total bank deposits, 67.86 percent of the branch network, and 60.51 percent of loan originations were from the state of Wisconsin.

When evaluating the bank's performance under the Lending Test, we placed more weight on the bank's performance in the 2015 through 2016 period. The majority of loan originations, 68.13 percent, occurred in 2015 through 2016. We also analyzed the bank's 2017 performance and factored that analysis into the various lending test ratings. Additionally, we placed a greater weight on the bank's home mortgage lending performance. Home mortgage loans make up 91.45 percent of all HMDA and CRA reportable loan originations throughout the evaluation period. Mortgage lending was analyzed based on aggregated mortgage loan data, which is provided at the product level in Appendix D. Conclusions for borrower income and geographic distribution of home mortgage loans consider the aggregated mortgage products. Competition and relative market presence also impacted the overall assessment. 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) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution or any affiliate whose loans have been considered as part of the institution's lending performance has engaged in discriminatory or other illegal credit practices that require consideration in this Evaluation.

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

Multistate Metropolitan Area Rating

Chicago MMSA

CRA rating for the Chicago MMSA¹: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is adequate, reflecting adequate penetration throughout the AA;
- The borrower distribution of loans is adequate, including home mortgages and small loans to businesses;
- CD lending is excellent and has a significantly positive impact on the overall lending test;
- The bank made a significant level of qualified CD investments, grants, and donations. Qualified investments were effective and exhibited good responsiveness to credit and CD needs;
- The bank's services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and,
- The bank made a relatively high level of CD services responsive to community needs.

Description of Institution's Operations in Chicago MMSA

The Chicago MMSA is made up of three MDs, which encompass eight counties. The Chicago-Naperville-Arlington Heights, IL MD consists of Cook, DuPage, Kendall, and McHenry Counties in Illinois. The Elgin, IL MD consists of DeKalb and Kane Counties in Illinois. The Lake County-Kenosha County, IL-WI MD consists of Lake County in Illinois and Kenosha County in Wisconsin. The AA complies with the regulation and does not arbitrarily exclude any LMI geographies.

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

ABNA operates 25 branches within the Chicago MMSA. There is strong competition within the AA for deposits and all types of loans. The top five banks by deposit market share are JPMorgan Chase Bank, National Association (22.33 percent), Bank of America, National Association (11.57 percent), BMO Harris Bank, National Association (11.51 percent), The Northern Trust Company (6.91 percent), and The Private Bank and Trust Company (4.59 percent). These five banks have a combined deposit market share of 56.91 percent.

ABNA offers its full range of products and services within the AA. The bank's primary focus is on home mortgage lending. Home mortgage lending totals 96.01 percent of HMDA and CRA originations throughout the evaluation period.

Refer to the community profile for the Chicago MMSA in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Chicago MMSA

ABNA has one full-scope area in this AA. As a result, we completed a full-scope review of the Chicago MMSA. Our ratings are based solely on the performance in this full-scope area. We placed greater weight on home mortgage and CRA lending performance, as those loans represent a majority of the lending in the AA.

We conducted two community contacts as part of this performance evaluation. The contacts included a local elected representative and a representative of a local small business investment company (SBIC). These community contacts identified the following credit needs in the AA: long-term infrastructure financing, general obligation bonding capacity within IRS tax exemption regulations, economic development, and small dollar loan programs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Chicago MMSA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Chicago MMSA is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Chicago MMSA is good. We placed greater weight on the bank's home mortgage lending, as these loans represented 96.01 percent of HMDA and CRA reportable loan originations throughout the evaluation period.

Lending Activity

Refer to Tables 1 Lending Volume in the Chicago MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Chicago MMSA is good relative to the competition for all types of loans and the bank's market presence in the AA. The bank had a minor presence in the small business loan market relative to the largest depository and lending institutions.

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 1.14 percent market share of deposits, ranking 14th among 172 financial institution in the AA, and ranking them in the top 8.14 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 1.16 percent market share of home purchase loans, ranking 18th among 744 reporting lenders and is equivalent to being in the top 2.42 percent of lenders. In addition, the top five home purchase lenders had 31.55 percent of the total market share. The bank achieved a 2.71 percent market share of home improvement loans, ranking ninth among 331 reporting lenders and is equivalent to being in the top 2.72 percent. The top five home improvement lenders had 32.37 percent of the total market share. The bank achieved a 0.69 percent market share of home refinance loans, ranking 29th among 733 reporting lenders and is equivalent to being in the top 3.96 percent. The top five home refinance lenders had 33.42 percent of the total market share.

Given competition from the other reporting lenders in the AA and the bank's rankings for each product mentioned above, overall mortgage lending activity is good. As noted herein, the bank is primarily a mortgage lender. ABNA achieved a 0.05 percent market share of small loans to businesses, ranking 64th among 216 reporting lenders, or 29.63 of the top percent of lenders. The small business lending activity is insignificant as the bank had little or no presence in this area given the bank's market share and ranking. The top five small business lenders had 65.94 percent of the total market share.

ABNA lending levels reflect good responsiveness to the credit needs of the AA. The proportion of the bank's loans is comparable to the proportion of bank deposits in the AA. The bank's market share ranking is greater than their deposit market share ranking for some lending products in the AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of the bank's lending by income level is adequate. We placed greater emphasis on the bank's home mortgage lending as these loans represent the majority of the bank's HMDA and CRA reportable loan originations.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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 bank exhibits an adequate geographic distribution of home mortgage loans in this AA.

The distribution of the bank's home mortgage loans (home purchase loans, home improvement loans and home mortgage refinance loans) in LMI geographies from 2015 through 2016 is adequate. The proportion of loans in LMI geographies was lower than both the proportion of

owner-occupied housing units in those geographies, and lower than the aggregate distribution of loans in those LMI geographies. The bank's performance in 2017 was consistent with their performance in 2015 through 2016.

ABNA is primarily a mortgage lender and competition in the Chicago MMSA is strong. The top five lenders made 32 percent of the home purchase and home improvement loans and 33 percent of the refinance loans. For the period of 2015-2016, the bank achieved a 1.16 percent market share and ranked 18th out of 744 reporting home purchase lenders. The bank achieved a 2.71 percent market share and ranked ninth out of 331 home improvement lenders. The bank achieved a 0.69 percent market share and ranked 29th out of 733 refinance lenders. The strong competition and ABNA's relative market presence contributed to the adequate assessment.

Small Loans to Businesses

Refer to Table 6 in the Chicago MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of the bank's small loans to businesses is adequate. The distribution of the bank's small loans to businesses in LMI geographies was adequate in the period of 2015 through 2016. The proportion of loans was lower than both the proportion of businesses and comparable to aggregate distribution of loans in those geographies. The bank performance in 2017 was consistent with their performance in the period of 2015 through 2016.

ABNA is primarily a mortgage lender with little or no presence in the small business lending market. The five top small business lenders made 66 percent of the small business loans. For the period of 2015-2016, the bank achieved a 0.05 percent market share and ranked 64th out of 216 small business lenders in this AA. The bank made 225 small business loans in 2015-2016 and 124 small business loans in 2017. The strong competition and ANBA's relative market presence contributed to the adequate assessment.

Lending Gap Analysis

We reviewed summary reports and lending distribution maps and analyzed the bank's home mortgage and small business lending throughout the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Chicago MMSA 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.

In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing cost compared to income levels for low-income families somewhat impacts these borrowers' ability to qualify for a home mortgage loan.

The bank exhibits an adequate distribution of home mortgage loans to borrowers of different income levels. The distribution of the bank's home mortgage loans to LMI borrowers is adequate for the period of 2015 through 2016. The proportion of loans to low-income borrowers was weaker than the proportion of low-income families, and comparable to the proportion of moderate-income families in this MMSA. The bank's performance was comparable to the aggregate distribution of loans to LMI families in this MMSA. The bank's performance in 2017 was weaker than their performance in the period of 2015 through 2016. More weight was placed on the 2015-2016 period than the 2017 period, which resulted in the aforementioned rating.

Small Loans to Businesses

Refer to Table 11 in the Chicago MMSA 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 bank exhibits a poor distribution of small loans to businesses of different sizes. The distribution of the bank's small loans to businesses with revenue of \$1 million or less was poor. The proportion of loans was weaker than both the proportion of small businesses and the aggregate distribution of loans to those businesses. The bank's performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Community Development Lending

Refer to Table 1 Lending Volume in the Chicago MMSA section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD lending was excellent, and had a significantly positive impact on the overall lending performance in the Chicago MMSA. During the evaluation period, the bank originated nine CD loans totaling \$63.65 million, or 14.11 percent of tier 1 capital allocated to the AA. The bank loans were responsive to identified community needs, with \$43.16 million dedicated to affordable housing. The bank also provided \$20.49 million in financing that was responsive to economic development needs.

- The bank originated a \$16.49 million loan for the acquisition and development of a multi-tenant building located within a low-income census tract. The project will create 300 temporary jobs during construction and permanent jobs upon completion.
- The bank originated a \$7.25 million loan to finance two existing buildings with 116 units. The residents must qualify for Section 8 housing. This project is part of HUD's Housing Assistance Program.
- The bank originated a \$25.00 million construction loan for the development of a multifamily complex, with retail space included. The loan will finance 217 units located within a low-income census tract. The project is located within a blighted area and was part of the Fullerton/Milwaukee TIF District Redevelopment Plan. Rents will be set at approximately 80 percent of HUD's Fair Market Rates.

Product Innovation and Flexibility

The bank originated \$53.55 million in Fair Housing Administration (FHA) mortgage loans throughout the evaluation period. These loans are considered flexible lending products and provide LMI borrowers opportunities to finance homes. The bank did not offer an innovative loan product.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Chicago MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Chicago MMSA is good.

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

ABNA has a significant level of qualified investments in the AA. During the evaluation period, ABNA made 52 investments totaling \$138.68 million and 111 donations totaling \$3.13 million. Total current period investments and donations totaled \$141.81 million, which is equivalent to 31.43 percent of tier 1 capital allocated to the AA. We also evaluated the ongoing impact of 59 prior period investments, with a total book value of \$210.23 million. Total qualified investments and donations of \$352.04 million represents 78.01 percent of tier 1 capital allocated to the AA.

ABNA exhibits good responsiveness to the credit and CD needs in the AA. The bank showed ongoing responsiveness to the AA's need of economic development and affordable housing. Current period investments support affordable housing and economic development through Low-Income Housing Tax Credits (LIHTC), Commercial Mortgage Backed Securities (CMBS), and Mortgage Backed Securities (MBS). The bank's donations primarily support CD services targeted to LMI individuals. The bank makes occasional use of innovative and complex investments. The following are examples of ABNA's investments:

- A \$13.70 million government sponsored MBS where the underlying mortgages were originated to LMI borrowers.
- Prior period investments of \$176.02 million in CMBS.
- A donation of \$1.02 million to a nonprofit housing organization that promotes homeownership and neighborhood revitalization.
- A donation of \$100 thousand to a nonprofit that assists low-income individuals in need of crucial home repairs. The bank's donation helped the organization make repairs on 38 low-income properties.
- An Investment of \$315 thousand in a Small Business Investment Company (SBIC), which promotes economic growth and development within the business community.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the Chicago MMSA is rated High Satisfactory.

Retail Banking Services

Refer to Table 15 in the Chicago MMSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's branches and alternative delivery systems are accessible to geographies and individuals of different income levels. ABNA had 25 branches and 32 deposit-taking ATM's throughout the AA. The bank does not have any branches or ATMs in low-income geographies. The percentage of branches in moderate-income geographies exceeds the percentage of the population in those geographies. The 2015 U.S. Census ACS update affected the geographic distribution of branches within the AA due to changes in the income level of a geography. A branch opened in a low-income geography was later designated in a moderate-income geography in 2017.

The opening and closing of branches improved the accessibility of ABNA's delivery of services across the AA, particularly to moderate-income geographies. The bank had a net decrease of one branch in the AA; however, there was a net increase of two branches in moderate-income geographies. ABNA closed three branches throughout the evaluation period. Branch closure procedures consider branch traffic, branch profitability, and proximity and accessibility of other branches.

ABNA's services do not vary in a way that inconveniences its AAs, particularly LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Community Development Services

Based on the level of CD services and performance context considerations, the provision of CD service is good.

The bank provides a relatively high level of CD services. CD services are responsive to community needs. During the evaluation period, ABNA employees provided financial literacy training to LMI individuals and small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, 66 ABNA employees provided services to 52 qualified organizations. Employee service hours in the Chicago MMSA totaled 1,139 hours throughout the evaluation period.

During the evaluation period, bank employees participated in 79 financial education events including 56 homebuyer classes, 22 financial literacy classes, and one small business class. These events included providing technical assistance to community groups to address identified CD needs in the area, primarily economic development.

Multistate Metropolitan Area Rating

Minneapolis MMSA

CRA Rating for the Minneapolis MMSA²:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Outstanding

The major factors that support this rating include:

- The geographic distribution of loans is good, reflecting good penetration throughout the AA;
- The overall borrower distribution of loans is good, including home mortgages. However, borrower distribution of small loans to businesses is poor;
- CD lending is good and has a positive impact on the overall lending test;
- The bank made a good level of qualified CD investments, grants, and donations. Qualified investments were effective and exhibited good responsiveness to credit and CD needs;
- The bank's services do not vary in any way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and,
- The bank made a relatively high level of CD services responsive to community needs.

Description of Institution's Operations in Minneapolis MMSA

The Minneapolis MMSA consists of a portion of the Minneapolis-St. Paul-Bloomington, MN-WI MMSA and includes Anoka, Chisago, Dakota, Hennepin, Ramsey, Scott, and Washington Counties in Minnesota and Pierce and St. Croix Counties in Wisconsin. The AA complies with the regulation and does not arbitrarily exclude LMI geographies.

ABNA operates 20 branches within the Minneapolis MMSA. There is strong competition for deposits and all types of loans in the AA. The top five banks by deposit market share are Wells Fargo Bank, National Association (41.46 percent), U.S. Bank National Association (38.13 percent), TCF National Bank (3.29 percent), Bremer Bank, National Association (2.23 percent),

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

and BMO Harris Bank National Association (1.69 percent). These five banks have a combined deposit market share of 86.80 percent.

ABNA offers its full range of products and services within the AA. The bank's primary focus is on home mortgage lending. Home mortgage lending totals 84.63 percent of HMDA and CRA reportable originations throughout the evaluation period.

Refer to the community profile for the Minneapolis MMSA in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Minneapolis MMSA

ABNA has one full-scope area in this AA. As a result, we completed a full-scope review of the Minneapolis MMSA. Our ratings are based solely on the performance in this full-scope area. We placed greater weight on home mortgage and CRA lending performance, as those loans represent a majority of the lending in the AA.

We conducted two community contacts as part of this performance evaluation. The contacts included representatives from local CD and community planning and economic development agencies. These community contacts identified the following credit needs in the AA: financing for pooled funds for CD projects, business financing on a direct or subordinated basis, small business start-up funding, and business financing for growth and expansion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Minneapolis MMSA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Minneapolis MMSA is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Minneapolis MMSA is good. We placed greater weight on the bank's home mortgage lending, as these loans represented 84.64 percent of HMDA and CRA reportable loan originations throughout the evaluation period.

Lending Activity

Refer to Table 1 Lending Volume in the Minneapolis MMSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Minneapolis MMSA is good relative to the competition for all types of loans and the bank's market presence in the AA. The bank had a minor presence in the small business loan market relative to the largest depository and lending institutions.

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 0.88 percent market share of deposits, ranking seventh among 124 financial institutions in the AA, and ranking them in the top 5.65 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 0.77 percent market share of home purchase loans, ranking 28th among 561 reporting lenders and is equivalent to being in the top 4.99 percent of lenders. In addition, the top five home purchase lenders had 39.70 percent of the total market share. The bank achieved a 0.95 percent market share of home improvement loans, ranking 17th among 269 reporting lenders and is equivalent to being in the top 6.32 percent. The top five home improvement lenders had 48.13 percent of the total market share. The bank achieved a 0.75 percent market share of home refinance loans, ranking 26th among 569 reporting lenders and is equivalent to being in the top 4.57 percent. The top five home refinance lenders had 37.41 percent of the total market share.

Given competition from the other reporting lenders in the AA and the bank's rankings for each product mentioned above, overall mortgage lending activity is good. As noted herein, the bank is primary a mortgage lender. ABNA achieved a 0.41 percent market share of small loans to businesses, ranking 26th among 147 reporting lenders, or 17.69 of the top percent of lenders. The small business lending activity was insignificant as the bank had little or no presence in this area given the bank's market share and ranking. The top five small business lenders had 77.36 percent of the total market share.

ABNA lending levels reflect good responsiveness to the credit needs of the AA, considering its small market presence and the levels of mortgage and small business loans made to LMI census tracts and borrowers.

Distribution of Loans by Income Level of the Geography

The geographic distribution of the bank's lending by income level is good. We placed greater emphasis on the bank's home mortgage lending as these loans represent the majority of the bank's HMDA and CRA reportable loan originations.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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 bank exhibits good geographic distribution of home mortgage loans in this AA.

The distribution of the bank's home mortgage (home purchase loans, home improvement loans and home mortgage refinance loans) in LMI geographies from 2015 through 2016 was good. The proportion of loans in LMI geographies exceeded both the proportion of owner-occupied housing units and the aggregate distribution of home mortgage loans in those geographies. The

bank's performance in 2017 was weaker than their performance in 2015 through 2016. We placed more weight on the period of 2015-2016, than the period of 2017.

Small Loans to Businesses

Refer to Table 6 in the Minneapolis MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of the bank's small loans to businesses is excellent. The distribution of the bank's small loans to businesses in LMI geographies is excellent in the period of 2015 through 2016. The proportion of loans was higher than both the proportion of businesses and the aggregate distribution of loans in those geographies. The bank performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Lending Gap Analysis

We reviewed summary reports and lending distribution maps and analyzed the bank's home mortgage and small business lending throughout the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Minneapolis MMSA 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.

In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing cost compared to income levels for low-income families somewhat impacts the borrowers' ability to qualify for a home mortgage loan.

The distribution of the bank's home mortgage loans to LMI borrowers is good for the period of 2015 through 2016. The proportion of loans to LMI borrowers was lower than the proportion of low-income families, and higher than the proportion of moderate-income families in this MMSA. The bank's performance was stronger than the aggregate distribution of loans to LMI families. The bank's performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Small Loans to Businesses

Refer to Table 11 in the Minneapolis MMSA 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 bank exhibits a poor distribution of small loans to businesses of different sizes. The distribution of the bank's small loans to businesses with revenue of \$1 million or less is poor. The proportion of loans was weaker than both the proportion of small businesses and the

aggregate distribution of loans to those businesses. The bank's performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Community Development Lending

Refer to Table 1 Lending Volume in the Minneapolis MMSA section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD lending was good, and had a positive impact on the overall lending performance in the Minneapolis MMSA. During the evaluation period, the bank originated two CD loans totaling \$20.05 million, or 11.52 percent of tier 1 capital allocated to the AA. All of the loans were dedicated to affordable housing, which was responsive to an identified community need.

- One of the two CDLs was a \$13.50 million loan to finance the construction of a 123-unit affordable housing apartment complex. The rents will be restricted to 80 percent of the average median income. The project was receiving additional funding from a Transit Oriented Development Grant from the City of Minneapolis. The project is close to public transportation.

Product Innovation and Flexibility

The bank originated or purchased \$33.13 million in FHA loans and \$8.81 million in Veterans Affairs (VA) loans throughout the evaluation period. These loans are considered flexible lending products and provide LMI borrowers opportunities to finance homes. The bank did not offer an innovative loan product.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Minneapolis MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Minneapolis MMSA is good.

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

ABNA has a significant level of qualified investments in the AA. During the evaluation period, ABNA made 24 investments totaling \$35.58 million and 57 donations totaling \$301 thousand. Total current period investments and donations totaled \$35.88 million, which is equivalent to 20.62 percent of tier 1 capital allocated to the AA. We also evaluated the ongoing impact of 24 prior period investments, with a total book value of \$14.79 million. Total qualified investments and donations of \$50.67 million represents 29.11 percent of tier 1 capital allocated to the AA.

ABNA exhibits good responsiveness to the credit and CD needs of the AA. The bank showed ongoing responsiveness to the AA's need of economic development and affordable housing. Current period investments support affordable housing and economic development through LIHTC, CMBS, and MBS. The bank makes occasional use of innovative and complex qualified investments. The following are examples of ABNA's investments:

- \$12.98 million in LIHTC for investments in properties that provided housing for LMI individuals.
- \$9.62 million in CMBS and \$1.60 million in an SBIC that supported economic development.
- \$11.38 million in MBS secured by properties located in LMI CTs. These investments supported affordable housing.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Minneapolis MMSA is rated Outstanding.

Retail Banking Services

Refer to Table 15 in the Minneapolis MMSA section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's branches and alternative delivery systems are accessible to geographies and individuals of different income levels within the AA. ABNA had 20 branches and 27 deposit-taking ATMs throughout the AA. The percentage of branches in LMI CTs exceeded the percentage of the population in those geographies.

Branch openings and closings have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies. The bank had a net decrease of four branches in the AA, with none of the branch closures occurring in LMI geographies.

ABNA's services do not vary in a way that inconveniences its AAs, particularly LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Community Development Services

Based on the level of CD services and performance context considerations, the provision of CD service is good.

The bank provides a relatively high level of CD services. CD services are responsive to community needs. During the evaluation period, ABNA employees provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or

provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, 28 ABNA employees performed 21 qualifying service activities totaling 850 hours.

During the evaluation period, bank employees participated in 104 financial education events including 89 homebuyer education classes and 15 financial literacy classes.

These events included providing technical assistance to community groups to address identified CD needs in the area, primarily economic development.

State Rating

State of Illinois

CRA Rating for Illinois³:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is adequate , reflecting adequate penetration throughout the AA;
- The overall borrower distribution of loans is good, including home mortgages. Borrower distribution for small loans to businesses is adequate;
- CD lending is neutral and has limited impact on the overall lending test;
- The bank made a significant level of qualified CD investments, grants, and donations. Qualified investments were effective and exhibited adequate responsiveness to credit and CD needs;
- The bank's services do not vary in a way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and,
- The bank made a relatively high level of CD services responsive to community needs.

Description of Institution's Operations in Illinois

ABNA has three AAs within the state of Illinois. These AAs include certain counties of the Peoria MSA, the St. Louis MSA, and the Rockford MSA. The counties within the Peoria MSA include Peoria and Tazewell counties. The counties within the St. Louis MSA include Madison, Monroe, and St. Clair counties. The Rockford MSA includes Winnebago County. These AAs complies with the regulation and do not arbitrarily exclude any LMI areas.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Peoria MSA

ABNA operates six branches within the Peoria MSA. There is strong competition for deposits and all types of loans within the AA. The top five banks by deposit market share are Morton Community Bank (32.53 percent), PNC Bank National Association (17.46 percent), South Side Trust & Savings Bank of Peoria (8.08 percent), Commerce Bank (6.48 percent), and JPMorgan Chase Bank (5.16 percent). These five banks have a combined deposit market share of 69.71 percent.

ABNA offers its full range of products and services within the AA. ABNA's primary focus is on home mortgage lending. Home mortgage lending totals 93.50 percent of HMDA and CRA reportable originations throughout the evaluation period. The Peoria MSA represents 16.82 percent of the statewide deposits and 30.00 percent of retail bank branches throughout the evaluation period.

St. Louis MSA

ABNA operates eight branches within the St. Louis MSA. There is strong competition for deposits and all types of loans within the AA. The top five banks by deposit market share are The Bank of Edwardsville (16.44 percent), Regions Bank (12.75 percent), U.S. Bank, National Association (6.66 percent), First Collinsville Bank (6.58 percent), and First Mid-Illinois Bank & Trust, National Association (6.58 percent). These five banks have a combined deposit market share of 49.01 percent.

ABNA offers its full range of products and services within the AA. ABNA's primary focus is on home mortgage lending. Home mortgage lending totals 93.11 percent of HMDA and CRA reportable originations throughout the evaluation period. The St. Louis MSA represents 31.14 percent of the statewide deposits and 40.00 percent of retail bank branches throughout the evaluation period.

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

Scope of Evaluation in Illinois

For the state of Illinois, we completed a full-scope review on the Peoria MSA and St. Louis MSA. We completed a limited-scope review of the Rockford MSA. The ratings are based primarily on the full-scope AAs.

- ABNA did not originate enough home improvement loans and small loans to business in 2017 to be considered a primary loan product in any AA. As a result, we did not analyze home improvement loans and small loans to businesses in 2017.
- ABNA did not originate enough small loans to businesses in the St. Louis MSA to be considered a primary loan product in the period of 2015 through 2016. As a result, we did not analyze small loans to businesses in the St. Louis MSA in the period of 2015 through 2016.

In determining our ratings, we placed greater weight on home mortgage lending performance, as those loans represent the majority of HMDA and CRA reportable loan originations in Illinois throughout the evaluation period.

We conducted two community contacts as part of this performance evaluation. The contacts included a city government officer and a small business member of the chamber of commerce for Peoria MSA and St. Louis MSA, respectively. These community contacts identified the following credit needs in the AA: general financing for small businesses, affordable housing, partnerships with local banks to spur cooperation and economic development, affordable housing down payment assistance, bank partnership with organizations offering affordable housing grants, bridge financing, and subsidies on affordable housing construction and rehab projects.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Illinois is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Peoria MSA and St. Louis MSA is adequate. We placed greater weight on the bank's home mortgage lending, as these loans represented the majority of loan originations throughout the evaluation period.

Lending Activity

Refer to Table 1 Lending Volume in the State of Illinois section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the state of Illinois is adequate relative to the competition for all types of loans and the bank's market presence in the AA. The bank had a minor presence in the small business loan market relative to the largest depository and lending institutions.

Peoria MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 3.04 percent market share of deposits, ranking 9th among 31 financial institutions in the AA, and ranking them in the top 29.03 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 1.53 percent market share of home purchase loans, ranking 14th among 175 reporting lenders and is equivalent to being in the top 8.00 percent of lenders. In addition, the top five home purchase lenders had 48.49 percent of the total market share. The bank made little or no home improvement loans for this period. The bank achieved a 2.62 percent market share of home refinance loans, ranking tenth among 176 reporting lenders and is equivalent to being in the top 5.68 percent. The top five home refinance lenders had 42.22 percent of the total market share. Given competition from the other reporting lenders in the AA and the bank's rankings for each product mentioned above, overall mortgage

lending activity is good. As noted herein, the bank is primarily a mortgage lender. The bank's lending levels exhibit good responsiveness to the credit needs of the AA. However, the proportion of the bank's loans is lower than the proportion of bank deposits in the AA. The bank's market share for home purchase, home refinance, and small business lending was weaker than their deposit market share due to considerable competition for all types of loans from non-depository institutions. The bank's market share ranking for home purchase and home refinance mortgage loans was greater than their deposit market share ranking. The bank market share ranking for small business loans is comparable to their deposit market share ranking.

ABNA achieved a 0.24 percent market share of small loans to business, ranking 24th among 64 reporting lenders, or 37.50 of the top percent of lenders. The small business lending activity is insignificant as the bank had little or no presence in this area given the bank's market share and ranking. The top five small business lenders had 62.19 percent of the total market share.

St. Louis MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 3.63 percent market share of deposits, ranking 6th among 41 financial institutions in the AA, and ranking them in the top 14.63 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 0.42 percent market share of home purchase loans, ranking 51st among 271 reporting lenders and is equivalent to being in the top 18.82 percent of lenders. In addition, the top five home purchase lenders had 27.53 percent of the total market share. The bank made no home improvement loans for this period. The bank achieved a 0.54 percent market share of home refinance loans, ranking 54th among 270 reporting lenders and is equivalent to being in the top 20.00 percent. The top five home refinance lenders had 25.59 percent of the total market share.

The bank had a minor presence in this market relative to the largest depository and lending institutions. The bank's lending levels exhibit poor responsiveness to the credit needs in the AA. The proportion of the bank's loans is lower than the proportion of bank deposits in the AA.

Given competition from the other reporting lenders in the AA and ANBA's minor presence in this AA, the bank made little home improvement loans and no small loans to businesses during this evaluation period. The bank's market share for home purchase, home refinance, and small business lending is weaker than their deposit market share due to considerable competition for all types of loans from non-depository institutions. The bank's market share ranking for home purchase and home refinance is weaker than their deposit market share ranking. Furthermore, ABNA lender ranking was somewhat poor.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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 the bank's lending by income level is adequate. We placed greater emphasis on the bank's home mortgage lending, as these loans represent the majority of the bank's HMDA and CRA reportable loan originations.

Peoria MSA

The bank exhibits an adequate geographic distribution of home mortgage loans in this AA.

The distribution of the bank's home mortgage (home purchase loans, home improvement loans and home mortgage refinance loans) in LMI geographies from 2015 through 2016 was adequate. The proportion of loans in LMI geographies was significantly lower than the proportion of owner-occupied housing units in low-income geographies and comparable to the proportion of owner-occupied housing units in moderate-income geographies in the 2015 through 2016 period. The proportion of loans in LMI geographies was comparable to the aggregate distribution in low-income geographies, and exceeded the aggregate distribution in moderate-income geographies. The bank's performance in 2017 was weaker than their performance in 2015 through 2016.

St. Louis MSA

The bank exhibits an adequate geographic distribution of home mortgage loans in this AA. The distribution of the bank's home mortgage (home purchase loans, home improvement loans and home mortgage refinance loans) in LMI geographies from 2015 through 2016 was adequate. The proportion of loans in LMI geographies was lower than the proportion of owner-occupied housing units in both low- and moderate-income geographies. The proportion of loans in LMI geographies was stronger than the aggregate distribution in both low- and moderate-income geographies. The bank's performance in 2017 was consistent with their performance in 2015 through 2016.

Small Loans to Businesses

Refer to Table 6 in the State of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of the bank's small loans to businesses is good.

ABNA is primarily a home mortgage lender in this market. Given the bank's limited small business lending level of .024 percent market share and ranking of 24th out of 64 small business lenders in this AA, ABNA managed a good lending distribution of loans to small businesses in LMI geographies. The bank made 23 small business loans for 2015-2016 and eight small business loans for 2017.

Peoria MSA

The distribution of the bank's small loans to businesses in LMI geographies is good in the 2015 through 2016 period.

The proportion of small loans to businesses in LMI geographies was lower than the proportion of businesses in low- income geographies, and the proportion was greater than the proportion of

businesses in moderate- income geographies. The bank performance was weaker than the aggregate distribution of small loans to businesses in low- income geographies, and stronger than the aggregate distribution in moderate-income geographies. The bank's performance in 2017 was consistent with their performance in 2015 through 2016.

Lending Gap Analysis

We reviewed summary reports and lending distribution maps and analyzed the bank's home mortgage and small business lending throughout the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 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.

In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing cost compared to income levels for low-income families somewhat impacts the borrowers' ability to qualify for a home mortgage loan.

Peoria MSA

The distribution of the bank's home mortgage loans to LMI borrowers is good for the period of 2015 through 2016. The proportion of loans to LMI borrowers was lower than the proportion of low-income families, and higher than the proportion of moderate-income families in this AA. The bank's performance was stronger than the aggregate distribution of loans to LMI families. The bank's performance in 2017 was consistent with their performance in 2015 through 2016.

St. Louis MSA

The distribution of the bank's home mortgage loans to LMI borrowers is good for the period of 2015 through 2016. The proportion of loans to LMI borrowers was lower than the proportion of low-income families, and higher than the proportion of moderate- income families in this AA. The bank's performance was stronger than the aggregate distribution of loans to LMI families. The bank's performance in 2017 was consistent with their performance in 2015 through 2016.

Small Loans to Businesses

We did not review small loans to businesses for the St. Louis MSA for 2015-2016 and 2017 because ABNA originated less than 20 small loans to businesses for both periods.

Peoria MSA

Refer to Table 11 in the state of Illinois section of appendix D for the facts and data used to evaluate the distribution of the bank's origination and purchase of small loans to businesses.

The bank exhibits an adequate distribution of small loans to businesses of different sizes. The level of small business lending was close to the number of small businesses with revenue of \$1 million or less.

The distribution of the bank's small loans to businesses with revenue of \$1 million or less is adequate. The proportion of loans was weaker than the proportion of small businesses, and stronger than the aggregate distribution of loans to those businesses. The bank's performance in 2017 was consistent with their performance in 2015 through 2016.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Illinois section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated one CD loan of \$1.7 million in Illinois, which had a neutral impact on the lending test.

Product Innovation and Flexibility

The bank originated or purchased \$3.78 million in FHA loans and \$3.33 million in VA loans throughout the evaluation period. These loans are considered flexible lending products and provide LMI borrowers opportunities to finance homes. The bank did not offer any innovative loan products.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the Rockford MSA is stronger than the bank's overall Low Satisfactory performance under the lending test in Illinois. The geographic and borrower distribution of home mortgage loans and small loans to businesses were stronger than the full-scope AAs, however, the stronger performance did not have a significant impact on the overall lending test rating in the state. Refer to Tables 1 through 13 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the investment test in state of Illinois is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Peoria MSA is excellent and performance in the St. Louis MSA is adequate.

Peoria MSA

ABNA has an excellent level of qualified investments in the AA. During the evaluation period, ABNA made four current period investments that total \$13.41 million and 15 donations totaling \$61 thousand. Total current period investments and donations of \$13.47 million is equivalent to 64.44 percent of tier 1 capital allocated to the AA. We also evaluated the ongoing impact of 11 prior period investments with a total book value of \$10.91 million. Total qualified investments and donations of \$24.38 million represents 116.61 percent of tier 1 capital allocated in the AA. The bank exhibits adequate responsiveness to the credit and CD needs in the AA.

The bank makes occasional use of innovative or complex qualified investments. The following are examples of ABNA's investments:

- A \$637 thousand historic tax credit investment within the AA.
- \$12.55 million in CMBS that supported economic development.

St. Louis MSA

ABNA has an adequate level of qualified investments. During the evaluation period, ABNA made seven qualified investments totaling \$1.82 million and nine donations totaling \$61 thousand. Total current period investments and donations of \$1.88 million is equivalent to 4.86 percent of tier 1 capital allocated to the AA. We also evaluated the ongoing impact of eight prior period investments with a total book value of \$1.75 million. Total qualified investments and donations of \$3.63 million represents 9.38 percent of the tier 1 capital allocated to this AA. The bank exhibits adequate responsiveness to the credit and CD needs in the AA, as all bank investments in the AA were dedicated to affordable housing. The bank makes occasional use of innovative or complex qualified investments. The following are examples of ABNA's investments:

- \$1.82 million in MBS securities with investments located in LMI CTs. These investments support affordable housing in the AA.
- A \$5 thousand donation to an organization that supports LMI youth. The organization teaches science, technology, engineering, and math skills.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Rockford MSA is weaker than the bank's overall High Satisfactory performance under the investment test in Illinois. The bank's weaker performance was due to a lower level of current period investments as a percentage of allocated tier 1 capital. Limited-scope performance was considered when assigning an overall rating; however, it did not have a significant impact on the overall rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Illinois is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Peoria MSA is excellent and performance in the St. Louis MSA is good.

Refer to Table 15 in the state of Illinois section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail Banking Services

Peoria MSA

ABNA's retail service performance in the AA is excellent. The bank's branches and alternative delivery systems are readily accessible to geographies and individuals of different income levels within the AA. ABNA had six branches with deposit-taking ATMs in the AA. The percentage of branches in low-income geographies exceeded the percentage of the population in those geographies, and the percentage of branches in moderate-income geographies was comparable to the population in those geographies. The bank did not have any branch openings or closings during the evaluation period.

ABNA's services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

St. Louis MSA

ABNA's retail service performance in the AA is good. The bank's branches and alternative delivery systems are accessible to geographies and individuals of different income levels within the AA. ABNA had eight branches with deposit-taking ATMs in the AA. The percentage of branches in low-income geographies exceeded the percentage of the population in those geographies. The percentage of branches in moderate-income geographies was lower than the percentage of the population in those geographies. The bank did not have any branch openings or closings during the evaluation period.

ABNA's services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Community Development Services

Peoria MSA

The bank provides an adequate level of CD services. CD services are responsive to community needs. During the evaluation period, ABNA employees provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, eight employees performed 41 qualifying service activities totaling 280 hours.

St. Louis MSA

The bank provides a relatively high level of CD services. CD services are responsive to community needs. During the evaluation period, ABNA employees provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, 21 employees performed 98 qualifying service activities totaling 390 hours.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the service test in the Rockford MSA is consistent with the bank's overall High Satisfactory rating under the service test in Illinois. Performance in the Rockford MSA is good.

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State Rating

State of Minnesota

CRA Rating for Minnesota⁴:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is adequate, reflecting adequate penetration throughout the AA;
- The borrower distribution of home mortgage loans is good;
- CD lending is adequate and has a neutral impact on the overall lending test;
- The bank made a significant level of qualified CD investments, grants, and donations. Qualified investments were effective and exhibited good responsiveness to credit and CD needs;
- The bank's services do not vary in a way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and,
- The bank made a relatively high level of CD services responsive to community needs.

Description of Institution's Operations in Minnesota

ABNA has two AAs within the state of Minnesota. The bank's AA within the Rochester MSA consists of Olmstead County. The Minnesota (MN) non-MSA consists of Goodhue County. These AAs comply with the regulation and does not arbitrarily exclude any LMI areas.

ABNA operates four branches within the Rochester MSA, and maintains a relatively minor presence in the AA. There is strong competition for deposits and all types of loans in the AA. The top five banks by deposit market share are Think Mutual Bank (28.82 percent), Wells Fargo

⁴ 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.

Bank, National Association (22.93 percent), U.S. Bank, National Association (11.29 percent), Bremer Bank, National Association (9.58 percent) and Home Federal Savings Bank (7.24 percent). These five banks have a combined deposit market share of 79.86 percent.

ABNA offers its full range of products and services within the AA. ABNA's primary focus is on home mortgage lending. Home mortgage lending totals 89.96 percent of HMDA and CRA reportable originations throughout the evaluation period. The Rochester MSA represents 58.64 percent of the statewide deposits and 80.00 percent of retail bank branches throughout the evaluation period.

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

Scope of Evaluation in Minnesota

For the state of Minnesota, we completed a full-scope review on the Rochester MSA. We completed a limited-scope review of the MN Non-MSA. The ratings are based primarily on the full-scope AAs. The bank did not originate enough small loans to businesses to be considered a primary loan product in the period of 2015 through 2016. As a result, we did not analyze small loans to businesses. In determining our ratings, we placed greater weight on home mortgage lending performance, as those loans represent the majority of HMDA and CRA reportable loan originations throughout the evaluation period.

We conducted one community contact as part of this performance evaluation. The contact was a city council member who identified the need for better public transportation and affordable housing within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Minnesota is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Rochester MSA is adequate. We placed greater weight on the bank's home mortgage lending, as those loans represented the majority of loan originations throughout the evaluation period.

Lending Activity

Refer to Table 1 Lending Volume in the state of Minnesota section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the state of Minnesota is adequate relative to the competition for all types of loans and the bank's market presence in the AA. The bank had a minor presence in the small business loan market relative to the largest depository and lending institutions.

Rochester MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 3.16 percent market share of deposits, ranking 8th among 19 financial institutions in the AA, and ranking them in the top 42.11 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 1.23 percent market share of home purchase loans, ranking 17th among 174 reporting lenders and is equivalent to being in the top 9.77 percent of lenders. In addition, the top five home purchase lenders had 48.28 percent of the total market share. The bank made zero home improvement loans for this period. The bank achieved a 1.25 percent market share of home refinance loans, ranking 15th among 185 reporting lenders and is equivalent to being in the top 8.11 percent. The top five home refinance lenders had 44.39 percent of the total market share.

Given competition from the other reporting lenders in the AA and the bank's rankings for each product, overall mortgage lending activity is good. As noted herein, the bank is primarily a mortgage lender.

ABNA achieved a 0.41 percent market share of small loans to business, ranking 18th among 52 reporting lenders, or 34.62 percent of the top percent of lenders. The small business lending activity is insignificant as the bank had little or no presence in this area given the bank's market share and ranking. The top five small business lenders had 70.06 percent of the total market share. The proportion of the bank's loans is lower than the proportion of bank deposits in the AA. There are 174 institutions originating home purchase loans and 185 institutions originating home refinance loans in the AA. There are 52 small business lenders in the AA. The bank has a minor presence in the market relative to the largest depository and lending institutions.

The bank's market share for home purchase, home refinance, and small business lending is weaker than their deposit market share due to considerable competition for all types of loans from non-depository institutions.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the state of Minnesota 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 bank exhibits an adequate geographic distribution of home mortgage loans in this AA.

Rochester MSA

The geographic distribution of the bank's home mortgage loans in moderate-income geographies during the period of 2015 through 2016 is adequate. The proportion of LMI loans

was lower than the proportion of owner-occupied housing units in moderate-income geographies, and was comparable to the aggregate distribution of loans in those geographies. The bank's performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Lending Gap Analysis

We reviewed summary reports and lending distribution maps and analyzed the bank's home mortgage and small business lending throughout the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Minnesota 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.

In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing cost compared to income levels for low-income families somewhat impacts these borrowers' ability to qualify for a home mortgage loan.

Rochester MSA

The distribution of the bank's home mortgage loans to LMI borrowers is good for the period of 2015 through 2016. The proportion of loans to LMI borrowers was stronger than the proportion of LMI families. The bank's performance was stronger than the aggregate distribution of loans to low-income families and comparable to moderate-income families. The bank's performance in 2017 was weaker than their performance in the period of 2015 through 2016.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Minnesota section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD lending was adequate, and had a neutral impact on the overall lending performance in the Rochester MSA.

During the evaluation period, the bank originated one CD loan totaling \$1.29 million, or 9.4 percent of tier 1 capital allocated to the AA. The loan was dedicated to affordable housing, financing a 27-unit apartment building. The project had 78 percent of the rents below market per HUD Fair Market rents.

Product Innovation and Flexibility

The bank originated or purchased \$2.07 million of FHA and \$477 thousand of VA loans throughout the evaluation period. These loan products are considered flexible lending products

and provide LMI borrowers opportunities to finance homes. The bank did not offer an innovative loan product.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Minnesota non-MSA is consistent with the bank's overall Low Satisfactory performance under the lending test in Minnesota. Refer to the Tables 1 through 13 in the state of Minnesota section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the investment test in the state of Minnesota is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Rochester MSA is good.

ABNA has a good level of qualified investments in the AA. During the evaluation period, ABNA made three investments totaling \$7.37 million and 17 donations totaling \$51 thousand. Current period investments and donations totaled \$7.42 million, which is equivalent to 53.75 percent of tier 1 capital allocated to the AA. Additionally, the bank had two prior period investments totaling \$315 thousand.

ABNA exhibits good responsiveness to the credit and CD needs in the AA. While its investments were not innovative, the bank investments were responsive to affordable housing needs. Current period investments support affordable housing through LIHTC and MBS. The bank's grants and donations primarily support CD services targeted to LMI individuals. The following is an example of an investment that was responsive to the affordable housing needs of the AA:

- A \$6.73 million LIHTC in a 128-unit development.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Minnesota non-MSA is weaker than the bank's High Satisfactory performance in the full-scope area. The bank's weaker performance was due to a lower level of current period investments as a percentage of allocated tier 1 capital. Limited-scope performance was considered when assigning an overall rating; however, it did not have a significant impact on the overall rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Minnesota is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Rochester MSA is good.

Retail Banking Services

Refer to Table 15 in the state of Minnesota section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's branches and alternative delivery systems are accessible to geographies and individuals of different income levels. ABNA had four branches and 27 deposit-taking ATMs throughout the AA. The bank had zero branches in low-income CTs and one branch in moderate-income CTs. The percentage of bank branches in moderate-income geographies exceeded the percentage of the population in those geographies. The bank did not have any branch openings or closings during the evaluation period in this AA.

ABNA's services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Management complements its delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Community Development Services

Based on the level of CD services and performance context considerations, the provision of CD services is good. The bank provides a relatively high level of CD services. During the evaluation period, ABNA bank employees provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties and five employees performed nine qualifying service activities totaling 143 hours to five different organizations that promote CD initiatives such as leadership roles and serving on the board of directors of various community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the service test in the MN- non-MSA AA is consistent with the bank's overall High Satisfactory rating under the service test in Minnesota.

State Rating

State of Wisconsin

CRA Rating for Wisconsin⁵:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is good, reflecting good penetration throughout the AA;
- The overall borrower distribution of loans is good, including home mortgages. However, borrower distribution for small business loans is poor;
- CD lending is adequate and had a neutral impact on the overall lending test rating;
- The bank made a significant level of qualified CD investments, grants, and donations. Qualified investments were effective and exhibited good responsiveness to credit and CD needs;
- The bank's services do not vary in a way that inconveniences portions of the bank's AA, particularly LMI geographies and individuals; and,
- The bank made a relatively high level of CD services responsive to community needs.

Description of Institution's Operations in Wisconsin

ABNA has 13 AAs within the State of Wisconsin; however, five were cited below as full scope AAs for review:

Green Bay MSA

The Green Bay MSA consists of Brown, Kewaunee, and Oconto Counties in Wisconsin. The AA complies with the regulation and does not arbitrarily exclude LMI geographies.

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.

ABNA operates 13 branches within the Green Bay MSA. There is strong competition within the AA for deposits and all types of loans. The top five banks by deposit market share are Associated Bank, National Association (32.59 percent), Nicolet National Bank (15.02 percent), BMO Harris Bank, National Association (12.21 percent), Wells Fargo Bank, National Association (5.99 percent), and JPMorgan Chase Bank, National Association (4.62 percent). These five banks have a combined deposit market share of 70.43 percent.

ABNA offers its full range of products and services within the AA. The bank's primary focus is on home mortgage lending. Home mortgage lending totals 88.46 percent of HMDA and CRA originations throughout the evaluation period. The Green Bay MSA represents 17.26 percent of the statewide deposits and 9.87 percent of retail bank branches.

La Crosse MSA

The La Crosse MSA consists of a portion of the La Crosse-Onalaska, WI-MN MMSA and includes La Crosse County in Wisconsin. The AA complies with the regulation and does not arbitrarily exclude LMI geographies.

ABNA operates five branches within the La Crosse MSA. There is strong competition within the AA for deposits and all types of loans. The top five banks by deposit market share are U.S. Bank, National Association (19.10 percent), Wells Fargo Bank, National Association (15.46 percent), Associated Bank, National Association (11.12 percent), Coulee Bank (10.01 percent), and River Bank (9.32 percent). These five banks have a combined deposit market share of 65.01 percent.

ABNA offers its full range of products and services within the AA. ABNA's primary focus is on home mortgage lending. Home mortgage lending totals 92.80 percent of HMDA and CRA originations throughout the evaluation period. The La Crosse MSA represents 1.96 percent of the statewide deposits and 3.29 percent of retail bank branches.

Madison MSA

The Madison MSA consists of Columbia, Dane, Iowa, and Green Counties in Wisconsin. Green County was added to the MSA in 2015, previously part of the bank's non-MSA footprint. The AA complies with the regulation and does not arbitrarily exclude LMI geographies.

ABNA operates 22 branches within the Madison MSA. There is strong competition within the AA for deposits and all types of loans. The top five banks by deposit market share are BMO Harris Bank, National Association (14.78 percent), Associated Bank, National Association (12.92 percent), U.S. Bank, National Association (9.22 percent), First Business Bank (5.58 percent), and John Deere Financial FSB (5.33 percent). These five banks have a combined deposit market share of 47.83 percent.

ABNA offers its full range of products and services within the AA. The bank's primary focus is on home mortgage lending. Home mortgage lending totals 84.35 percent of HMDA and CRA originations throughout the evaluation period. The Madison MSA represents 17.48 percent of the statewide deposits and 15.13 percent of retail bank branches.

Milwaukee-Waukesha-West Allis MSA (Milwaukee MSA)

The bank chose four counties in the Milwaukee, WI MSA as its AA: Milwaukee, Ozaukee, Washington, and Waukesha. The AA complies with the regulation and does not arbitrarily exclude LMI geographies.

ABNA operates 39 branches within the Milwaukee MSA. The top five banks by deposit market share are U.S. Bank, National Association (43.11 percent), BMO Harris Bank, National Association (13.36 percent), JPMorgan Chase Bank, National Association (8.92 percent), Associated Bank, National Association (7.47 percent) and Wells Fargo Bank, National Association (2.96 percent). These five banks have a combined deposit market share of 75.82 percent.

ABNA offers its full range of products and services within the AA. ABNA's primary focus is on home mortgage lending. Home mortgage lending totals 84.63 percent of HMDA and CRA originations throughout the evaluation period. The Milwaukee-Waukesha-West Allis MSA represents 35.90 percent of the statewide deposits and 28.29 percent of retail bank branches.

WI non-MSA

The bank chose 24 counties of WI non-MSA as its AA: Ashland, Clark, Crawford, Dodge, Door, Forest, Iron, Jefferson, Lincoln, Manitowoc, Marinette, Oneida, Portage, Price, Richland, Sauk, Sawyer, Shawano, Taylor, Vernon, Vilas, Walworth, Waupaca, and Wood counties. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. ABNA operates 37 branches within the WI non-MSA. There is strong competition within the AA for deposits and all types of loans. The top five banks by deposit market share are BMO Harris Bank, National Association (10.70 percent), Associated Bank, National Association (10.12 percent), Investors Community Bank (4.61 percent), Nicolet National Bank (4 percent), and Bank First National (2.87 percent). These five banks have a combined deposit market share of 32.30 percent.

ABNA offers its full range of products and services within the AA. ABNA's primary focus is on home mortgage lending. Home mortgage lending totals 91.46 percent of HMDA and CRA originations throughout the evaluation period. The WI-Non-MSA represents 12.73 percent of the statewide deposits and 25.66 percent of retail bank branches.

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

Scope of Evaluation in Wisconsin

For the state of Wisconsin, we completed a full scope review of the following areas: Green Bay MSA, La Crosse MSA, Madison MSA, Milwaukee MSA, and WI non-MSA. Ratings are based primarily on the full-scope AAs. We selected the full-scope areas based on ABNA's deposits, branches, and home mortgage loans in the state of Wisconsin. When combined, the full-scope AAs in Wisconsin account for 85.33 percent of deposits, 82.23 percent of branches, and 69.97 percent of home mortgage loans. In determining our ratings, we placed the most weight on the Milwaukee MSA. The Milwaukee MSA is the bank's largest AA in terms of deposits (35.90 percent), branches (32.22 percent), and mortgage loans (23.25 percent) within the state of

Wisconsin. In our analysis of lending performance, we placed the most weight on home mortgage lending performance, as those loans represent 87.94 percent of HMDA and CRA originations throughout the evaluation period.

We conducted several community contacts as part of this performance evaluation. The community contacts identified the need for affordable housing, loans to refurbish foreclosed properties, and loans for economic development within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

Conclusions for Areas Receiving Full Scope Reviews

The bank's performance under the lending test in Wisconsin is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Green Bay MSA, La Crosse MSA, Madison MSA, and Wisconsin non-MSA is good and performance in the Milwaukee MSA is adequate. We placed greater weight on the bank's home mortgage lending, as those loans represented the majority of loan originations.

Lending Activity

Refer to Table 1 Lending Volume in the state of Wisconsin section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the state of Wisconsin is good relative to the competition for all types of loans and the bank's market presence in the AA. The bank had a minor presence in the small business loan market relative to the largest depository and lending institutions. Lending levels reflect good responsiveness to the credit needs of the bank's AA.

Green Bay MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 32.59 percent market share of deposits, ranking first among 22 financial institutions in the AA, and ranking them in the top 4.54 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 9.34 percent market share of home purchase loans, ranking first among 211 reporting lenders, and is equivalent to being in the top 0.47 percent. The bank achieved a 7.35 percent market share of home improvement loans, ranking fourth among 65 reporting lenders and is equivalent to being in the top 6.15 percent. The top five home improvement lenders had 45.24 percent of the total market share. The bank achieved a 6.95 percent market share of home refinance loans, ranking first among 202 reporting lenders, and is equivalent to being in the top 0.50 percent.

Given competition from the other reporting lenders in the AA and the bank's rankings noted above for each product, overall mortgage lending activity is good. As noted herein, the bank is primarily a mortgage lender.

ABNA achieved a 2.41 percent market share of small loans to business, ranking ninth among 68 reporting lenders, and equivalent to being in the top 13.24 percent of lenders. The small business lending activity is good given the bank's AA presence. The top five small business lenders had 69.97 percent of the total market share.

The bank had a significant presence in the market relative to the largest depository and lending institutions. The proportion of bank loans is weaker than the proportion of bank deposits in the AA. Lending activity in the Wisconsin MSA is good relative to the competition for all types of loans and the bank's market presence in the AA. The bank had a minor presence in the small business loan market relative to the largest depository and lending institutions.

La Crosse MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved an 11.12 percent market share of deposits, ranking 3rd among 14 financial institutions in the AA, and ranking them in the top 21.43 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 6.24 percent market share of home purchase loans, ranking 2nd among 115 reporting lenders and is equivalent to being in the top 1.74 percent of lenders. The top home purchase lender had 26.67 percent of the total market share. The bank made zero home improvement loans for this period. The bank achieved a 5.74 percent market share of home refinance loans, ranking third among 106 reporting lenders and is equivalent to being in the top 2.83 percent. The top two home refinance lenders had 27.77 percent of the total market share.

Given competition from the other reporting lenders in the AA and the bank's rankings noted above for each product, overall mortgage lending activity is good. As noted herein, the bank is primarily a mortgage lender.

ABNA achieved a 0.97 percent market share of small loans to business, ranking 15th among 49 reporting lenders, or in the top 30.61 percent of lenders. The small business lending activity is insignificant as the bank had little or no presence in this area given the bank's market share and ranking. The top five small business lenders had 62.11 percent of the total market share.

The bank's ranking in loans is comparable to the bank's ranking in deposits. However, the bank's market share is weaker than the market share of deposits, as there are considerably more competitors for loans than deposits.

Madison MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 12.92 percent market share of deposits, ranking 2nd among 51 financial institutions in the AA, and ranking them in the top 3.92 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 2.81 percent market share of home purchase loans, ranking 6th among 297 reporting lenders and is equivalent to being in the top 2.02 percent of lenders. In addition, the top five home purchase lenders had 37.16 percent of the total market share. The bank achieved a 2.89 percent market share of home improvement loans, ranking fifth among 116 reporting lenders and is equivalent to being in the top 4.31 percent. The top four home improvement lenders had 47.36 percent of the total market share. The bank achieved a 2.41 percent market share of home refinance loans, ranking seventh

among 303 reporting lenders and is equivalent to being in the top 2.31 percent. The top five home refinance lenders had 32.64 percent of the total market share.

Given competition from the other reporting lenders in the AA and the bank's rankings noted above for each product, overall mortgage lending activity is good. As noted herein, the bank is primarily a mortgage lender.

ABNA achieved a 1.15 percent market share of small loans to business, ranking tenth among 85 reporting lenders, or the top 11.76 percent of lenders. The small business lending activity is insignificant as the bank had little or no presence in this area given the bank's market share and ranking. The top five small business lenders had 77.60 percent of the total market share. The bank's market share for all lending products is weaker than their deposit market share because there is considerable competition for all types of loans from non-depository institutions.

Milwaukee MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 7.47 market share of deposits, ranking 4th among 47 financial institutions in the AA, and ranking them in the top 8.51 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 4.06 percent market share of home purchase loans, ranking 4th among 381 reporting lenders and is equivalent to being in the top 1.05 percent of lenders. In addition, the top three home purchase lenders had 22.42 percent of the total market share. The bank achieved a 3.04 percent market share of home improvement loans, ranking eighth among 152 reporting lenders and is equivalent to being in the top 5.26 percent. The top five home improvement lenders had 42.35 percent of the total market share. The bank achieved a 2.55 percent market share of home refinance loans, ranking eighth among 396 reporting lenders and is equivalent to being in the top 2.02 percent. The top five home refinance lenders had 30.73 percent of the total market share.

Given competition from the other reporting lenders in the AA and the bank's rankings noted above for each product, overall mortgage lending activity is good. As noted herein, the bank is primarily a mortgage lender.

ABNA achieved a 1.08 percent market share of small loans to business, ranking 16th among 119 reporting lenders, or in the top 13.45 percent of lenders. The small business lending activity is insignificant given the bank's market share and ranking. The top five small business lenders had 67.82 percent of the total market share.

The bank's market share for all home mortgage products and small business lending is weaker than their deposit market share due to considerable competition for all types of loans from non-depository institutions. The bank's market share ranking of small business loans is weaker than their overall deposit market share ranking.

WI non-MSA

Based upon the FDIC Market Share data as of June 30, 2017, ABNA achieved a 10.12 market share of deposits, ranking 2nd among 107 financial institutions in the AA, and ranking them in the top 1.87 percent of the total depository institutions.

Based upon 2016 Peer Mortgages Data, ABNA achieved a 5.35 percent market share of home purchase loans, ranking 2nd among 470 reporting lenders and is equivalent to being in the top .43 percent of lenders. In addition, the top home purchase lender had 5.91 percent of the total market share. The bank achieved a 4.55 percent market share of home improvement loans, ranking third among 198 reporting lenders and is equivalent to being in the top 1.52 percent. The top two home improvement lenders had 17.81 percent of the total market share. The bank achieved a 5.27 percent market share of home refinance loans, ranking first among 469 reporting lenders.

Given competition from the other reporting lenders in the AA and the bank's rankings noted above for each product, overall mortgage lending activity is good.

ABNA achieved a 1.11 percent market share of small loans to business, ranking 14th among 99 reporting lenders, or 14.14 in the top percent of lenders. The small business lending activity is insignificant as the bank had little or no presence in this area given the bank's market share and ranking. The top five small business lenders had 67.10 percent of the total market share.

The bank's market share for all home mortgage products and small business lending is weaker than their deposit market share due to considerable competition for all types of loans from non-depository institutions. The bank's market share ranking of small business loans is weaker than their overall deposit market share ranking.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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.

The geographic distribution of home mortgage loans by income level in Wisconsin is good.

Green Bay MSA

The bank exhibits a good geographic distribution of home mortgage loans in this AA.

The proportion of LMI loans was comparable to the proportion of owner-occupied housing units in those geographies, and comparable to the aggregate distribution of loans in those geographies for 2015-2016. The bank's performance in 2017 was consistent with their performance in the period of 2015 through 2016.

La Crosse MSA

The bank exhibits an adequate geographic distribution of home mortgage loans in this AA.

The proportion of LMI loans was lower than the proportion of owner-occupied housing units in low-income geographies and stronger in moderate-income geographies for 2015-2016. The proportion of loans was lower than the aggregate distribution of mortgage loans in low-income

geographies and stronger than the aggregate distribution in moderate-income geographies for 2015-2016. The bank's performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Madison MSA

The bank exhibits a good geographic distribution of home mortgage loans in this AA.

The proportion of LMI loans was lower than the proportion of owner-occupied housing units in low-income geographies and comparable in moderate-income geographies for 2015-2016. The proportion of LMI loans was weaker than the aggregate in low-income geographies and higher in moderate-income geographies. The bank's performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Milwaukee MSA

The bank exhibits an adequate geographic distribution of home mortgage loans in this AA.

The proportion of LMI loans was lower than the proportion of owner-occupied housing units in those geographies, and comparable to the aggregate distribution of loans in those geographies for 2015-2016. The bank's performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Wisconsin non-MSA

The bank exhibits a good geographic distribution of home mortgage loans in this AA.

The proportion of LMI loans was lower than the proportion of owner-occupied housing units in those geographies, and comparable to the aggregate distribution of loans in those geographies for 2015-2016. The bank's performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Small Loans to Businesses

Refer to Table 6 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to business is adequate in the state of Wisconsin.

Green Bay

The distribution of the bank's small loans to businesses in LMI geographies is adequate in the 2015 through 2016 period. The proportion of small loans to businesses was lower than the proportion of businesses in low- income geographies and greater than the proportion of businesses in moderate- income geographies. The proportion of loans was significantly lower than the aggregate in low- income geographies and greater than the aggregate in moderate-

income geographies. The bank's performance in 2017 was stronger than their performance in the period of 2015 through 2016.

La Crosse MSA

The distribution of the bank's small loans to businesses in LMI geographies is adequate in the 2015 through 2016 period. The proportion of small loans to businesses was greater than the proportion of businesses in low-income geographies and comparable to the proportion of businesses in moderate-income geographies. The proportion of loans was significantly greater than the aggregate in low-income geographies and comparable to the aggregate in moderate-income geographies. The bank's performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Madison MSA

The distribution of the bank's small loans to businesses in LMI geographies is excellent for the period of 2015 through 2016. The proportion of small loans to businesses was greater than the proportion of businesses in those geographies, and greater than the aggregate distribution of loans in those geographies. The bank performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Milwaukee MSA

The distribution of the bank's small loans to businesses in LMI geographies is poor for the period of 2015 through 2016. The proportion of small loans to businesses was lower than the proportion of businesses in those geographies. The bank's performance was comparable to the aggregate distribution of loans in those geographies. The bank performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Wisconsin non-MSA

The distribution of the bank's small loans to businesses in moderate-income geographies is excellent for the period of 2015 through 2016. The proportion of small loans to businesses was higher than the proportion of businesses in those geographies, and higher than the aggregate distribution of loans in those geographies. The bank performance in 2017 was consistent with their performance in the period of 2015 through 2016.

Lending Gap Analysis

We reviewed summary reports and lending distribution maps and analyzed the bank's home mortgage and small business lending throughout the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 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.

The distribution of home mortgage loans by income level of the borrower is good in the state of Wisconsin.

In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing cost compared to income levels for low-income families somewhat impacts these borrowers' ability to qualify for a home mortgage loan.

Green Bay MSA

The distribution of the bank's home mortgage loans to LMI borrowers is good for the period of 2015 through 2016.

The proportion of loans to low-income borrowers was lower than the proportion of low-income families, and higher than the proportion of moderate-income families. The bank's performance was stronger than the aggregate distribution of loans to LMI families. The bank's performance in 2017 was weaker than their performance in the period of 2015 through 2016.

La Crosse MSA

The distribution of the bank's home mortgage loans to LMI borrowers is good for the period of 2015 through 2016.

The proportion of loans to low-income borrowers was lower than the proportion of low-income families, and stronger than the proportion of moderate-income families. The bank's performance was stronger than the aggregate distribution of LMI families. The bank's performance in 2017 was weaker than their performance in the period of 2015 through 2016.

Madison MSA

The distribution of the bank's home mortgage loans to LMI borrowers is good for the period of 2015 through 2016.

The proportion of loans to low-income borrowers was lower than the proportion of low-income families, and higher than the proportion of moderate-income families. The bank's performance was stronger than the aggregate distribution of LMI families. The bank's performance in 2017 was weaker than their performance in the period of 2015 through 2016.

Milwaukee MSA

The distribution of the bank's home mortgage loans to LMI borrowers is adequate for the period of 2015 through 2016.

The proportion of loans to low-income borrowers was lower than the proportion of low-income families, and comparable to the proportion of moderate-income families. The bank's

performance was stronger than the aggregate distribution of low- income families and comparable to the aggregate distribution of moderate-income families. The banks performance in 2017 was weaker than their performance during the period of 2015 through 2016.

Wisconsin non-MSA

The distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good for the period of 2015 through 2016.

The proportion of loans to low- income borrowers was lower than the proportion of low-income families, and higher than the proportion of moderate- income families. The bank's performance was stronger than the aggregate distribution of LMI families. The banks performance in 2017 was comparable with their performance in the period of 2015 through 2016.

Small Loans to Businesses

Refer to Table 11 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to business is poor.

Green Bay MSA

The distribution of the bank's small loans to businesses with revenue of \$1 million or less is poor. The proportion of loans was lower than both the proportion of small businesses and the aggregate distribution of loans to those businesses. The banks performance in 2017 was stronger than their performance in the period of 2015 through 2016.

La Crosse MSA

The distribution of the bank's small loans to businesses with revenue of \$1 million or less is poor. The proportion of loans was lower than both the proportion of small businesses and the aggregate distribution of loans to those businesses. The banks performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Madison MSA

The distribution of the bank's small loans to businesses with revenue of \$1 million or less is poor. The proportion of loans was lower than both the proportion of small businesses and the aggregate distribution of loans to those businesses. The banks performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Milwaukee MSA

The distribution of the bank's small loans to businesses with revenue of \$1 million or less is poor. The proportion of loans was lower than both the proportion of small businesses and the aggregate distribution of loans to those businesses. The banks performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Wisconsin non-MSA

The distribution of the bank's small loans to businesses with revenue of \$1 million or less is adequate. The proportion of loans was lower than the proportion of small businesses, and comparable to the aggregate distribution of loans to those businesses. The bank's performance in 2017 was stronger than their performance in the period of 2015 through 2016.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Wisconsin section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

The volume of CD lending was adequate and has a neutral impact on the overall lending test rating in the state of Wisconsin.

Green Bay MSA

The volume of CD lending was poor, and had a negative impact on the overall lending performance in the Green Bay MSA. During the evaluation period, the bank originated one CD loan totaling \$200 thousand, or 0.07 percent of the tier 1 capital allocated to the AA. The loan was dedicated to affordable housing and was provided to a nonprofit to invest in foreclosed properties. The properties will be improved and rented to low- and moderate-income individuals.

La Crosse MSA

The volume of CD lending was adequate, and had a neutral impact on the overall lending performance in the La Crosse MSA. During the evaluation period, the bank originated one CD loan totaling \$1.47 million, or 4.72 percent of tier 1 capital allocated to the AA. The loan was dedicated to affordable housing and financed two apartment buildings totaling 42-units. One of the buildings is located in a moderate-income census tract. All of the rents are 100 percent below market, per HUD Fair Market Rent.

Madison MSA

The volume of CD lending was excellent, and had a significantly positive impact on the overall lending performance in the Madison MSA. During the evaluation period, the bank originated seven CD loans totaling \$49.14 million, or 17.74 percent of tier 1 capital allocated to the AA. All of the loans were dedicated to affordable housing, which was responsive to an identified community need.

- The bank originated two loans totaling \$6.77 million to construct a new 80-unit multifamily project. The project is affordable to families making less than 60 percent of the area median income. The project has various types of units including one, two, and three bedroom units.

- The bank made a \$1.68 million loan for the acquisition of a 60-unit senior housing project. All residents will be over 55 years old, and make less than 60 percent of the area median family income.
- The bank made two loans to a nonprofit totaling \$30 million. The nonprofit's mission is to provide, protect, and preserve the long-term viability of affordable housing for low- and moderate-income citizens.

Milwaukee MSA

The volume of CD lending was good, and had a positive impact on the overall lending performance in the Milwaukee MSA. During the evaluation period, the bank originated 14 CD loans totaling \$42.58 million, or 7.49 percent of tier 1 capital allocated to the AA. All of the loans were dedicated to affordable housing, which is responsive to an identified community need.

- The bank provided a \$1.77 million loan to finance a 51-unit apartment building. The building is located in moderate-income census tract. All of the units will be below the fair market rents in the AA.
- The bank provided a \$1.87 million loan to finance the acquisition and rehabilitation of a 48-unit senior housing complex. All units are restricted to ensure moderate-income individuals can afford the rents. The project was awarded LIHTC status.
- The bank made a \$2.26 million loan to construct a 51-unit multifamily project located in a low-income census tract. The project has restricted rents on 43 of the units for residents with less than 60 percent of the area median income, which includes 12 section 8 units. The project was awarded LIHTC status, which the bank purchased.

Wisconsin Non-MSA

The volume of CD lending was adequate, and had a neutral impact on the overall lending performance in the La Crosse MSA. During the evaluation period, the bank originated three CD loans totaling \$6.91 million, or 3.42 percent of tier 1 capital allocated to the AA. The bank originated two loans totaling \$4.67 million dedicated to affordable housing, and one loan for \$2.24 million for economic development.

- The bank originated a \$3.35 million loan to construct a section 8 housing complex. The project consisted of 40-units, with eligible families paying no more than 40 percent of their adjusted income for rent.
- The bank originated a \$2.24 million loan to expand a manufacturing warehouse. The expansion of the warehouse was expected to create an additional 35 jobs.

Product Innovation and Flexibility

The bank originated or purchased \$45.21 million in FHA loans and \$53.49 million in VA loans throughout the evaluation period. These loans are considered flexible lending products and provide LMI borrowers opportunities to finance homes. The bank did not offer any innovative loan products.

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 MSA, Janesville-Beloit MSA (Janesville MSA), and Sheboygan MSA is consistent with the bank's overall High Satisfactory performance under the lending test in Wisconsin. In the Appleton MSA, Eau Claire MSA, Oshkosh-Neenah MSA (Oshkosh MSA), Racine MSA, and Wausau MSA, the bank's performance is weaker than the bank's overall performance in the state, considering either weaker geographic and/or borrower distribution. The weaker performance did not have an impact on the overall lending test rating in the state. Refer to the Tables 1 through 13 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the investment test in Wisconsin is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Milwaukee MSA and Wisconsin non-MSA is good and the bank's performance in the Green Bank MSA, La Crosse MSA, and Madison MSA was adequate.

ABNA exhibits good responsiveness to the credit and community development needs of the AA. The bank showed ongoing responsiveness to the AA's need of economic development and affordable housing. Current period investments support affordable housing and economic development through LIHTCs, CMBs, and MBSs. The bank makes occasional use of innovative and complex qualified investments. The following are examples of ABNA's investments:

Green Bay MSA

The bank had an adequate level of qualified investments in the AA. During the evaluation period, the bank made 27 investments totaling \$15.21 million and 53 donations totaling \$465 thousand. Current period investments and donations totaled \$15.67 million, which is equivalent to 5.73 percent of tier 1 capital allocated to the AA. We also evaluated the ongoing impact of 28 prior period investments in the AA, with a total book value of \$7.65 million. Total qualified investments and donations of \$23.32 million represents 8.53 percent of tier 1 capital allocated to the AA.

The bank's investments were responsive to the identified community needs of affordable housing. The following are examples of ABNA's investments:

- 26 investments totaling \$11.99 million in MBS located in LMI CTs.
- A \$10 thousand donation to a CDFI to support economic development.

La Crosse MSA

The bank had a poor level of qualified investments in the AA. ABNA made 10 current period investments totaling \$1.14 million and 15 donations totaling \$34 thousand. Current period investments and donations totaled \$1.17 million, which is equivalent to 3.77 percent of tier 1 capital allocated to the AA. We also evaluated the ongoing impact of two prior period investments with a total book value of \$242 thousand. Total qualified investments and donations of \$1.41 million represents 4.55 percent of tier 1 capital allocated to the AA.

ABNA exhibits adequate responsiveness to the credit and community needs of the AA. All current period investments were MBS and were responsive to affordable housing needs within the AA. The bank makes occasional use of innovative or complex products.

- One MBS investments located in LMI CTs totaling \$1.14 million.

Madison MSA

The bank had an adequate level of qualified investments in the AA. During the evaluation period, the bank made 16 investments totaling \$17.60 million and 50 donations totaling \$220 thousand. Current period investments and donations totaled \$17.82 million, which is equivalent to 6.43 percent of tier 1 capital allocated to the AA. We also evaluated the ongoing impact of 23 qualified prior period investments in the AA, with a total book value of \$7.74 million. Total qualified investments and donations of \$25.56 million represents 9.23 percent of tier 1 capital allocated to the AA.

ABNA exhibits adequate responsiveness to the credit and community needs of the AA. The majority of current period investment dollars (72.86 percent) were in two LIHTC projects. All current period investments supported affordable housing needs in the AA. The bank makes occasional use of innovative or complex products. The following are examples of ABNA's investments:

- Two investments in LIHTCs totaling \$12.82 million.
- 14 MBS investments located in LMI CT's totaling \$4.76 million.

Milwaukee MSA

The bank made a significant level of qualified investments in the AA. ABNA made 33 current period investments totaling \$65.18 million and 91 donations totaling \$1.51 million. Total current period investments and donations of \$66.69 million equal 11.73 percent of tier 1 capital allocated to the AA. ABNA had an additional 33 prior period investments worth \$40.76 million. Total qualified investments and donations of \$107.17 million equal 18.84 percent of tier 1 capital allocated to the AA. ABNA exhibit good responsiveness to the community needs of the AA. Bank investments were responsive to affordable housing and economic development needs in the AA. The bank makes significant use of innovative and complex qualified investments. Some examples of investments are:

- An \$8.09 million investment in LIHTCs. This investment creates 44 affordable housing units, with rents set aside for those earning less than 60 percent of the area median income. The project qualified for federal historic preservation tax credits.
- A \$6.71 million LIHTC investment in a 43-unit multifamily housing project. The projects residents will have rent at either 30 percent, 50 percent, or 60 percent of the median area income. The project has allocated 27.90 percent of the units for section 8 housing.
- The bank made a \$6.80 million LIHTC investment in a 41-unit apartment building in a low-income CT. The development also includes 8,000 sq. ft. of retail space and preserves the neighborhoods history.
- The bank invested \$571 thousand into a CDFI that specializes in investments in organizations that provide services to the AA. The CDFI specializes working with human service agencies, health centers, schools, and grocery stores.

Wisconsin non-MSA

The bank made a significant level of qualified investments in the AA. ABNA made 22 investments totaling \$12.48 million and 43 donations totaling \$170 thousand throughout the evaluation period. Total current period qualified investments and donations of \$12.65 million equal 6.27 percent of tier 1 capital allocated to the AA. The bank had an additional 39 qualified prior period investments worth 10.09 million. Total qualified investments and donations of \$22.74 million equal 11.28 percent of tier 1 capital allocated to the AA. The institution exhibits adequate responsiveness to community needs. The majority of current period investments were allocated to affordable via LIHTCs and MBSs. The bank also made some investments in economic development. The bank makes occasional use of innovative or complex investments. Some examples of investments are:

- The bank made two investments in LIHTCs projects totaling \$3.92 million. These projects support affordable housing.
- The bank made 18 investments in MBSs for \$8.04 million. These investments support affordable housing in the AA.
- The bank made a \$443 thousand investment in a commercial mortgage backed security (CMBS). This investment supports economic development.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test is consistent with their overall High Satisfactory performance in Wisconsin. The bank's performance in the Appleton MSA, Fond du Lac MSA, Racine MSA, and Sheboygan MSA was stronger than their overall performance, due to a higher level of current period investments as a percentage of allocated tier 1 capital. The bank's performance in the Oshkosh MSA was consistent with ABNA's overall investment test rating. The bank's performance in the Eau Claire MSA, Janesville MSA, and Wausau MSA was weaker than their overall performance, due to a lower level of current period investments as a percentage of allocated tier 1 capital.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Wisconsin is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Green Bay MSA, Madison MSA, and Wisconsin non-MSA is excellent. The bank's performance in the La Crosse MSA is good. The bank's performance in the Milwaukee MSA is adequate.

Retail Banking Services

Refer to Table 15 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Green Bay MSA

The bank's retail service performance is excellent. The bank's branches and alternative delivery systems are readily accessible to geographies and individuals of different income levels. ABNA had 13 branches and 39 deposit-taking ATMs throughout the AA. In 2017, only 4.29 percent of CTs were designated as low-income in the Green Bay MSA. The bank has three branches located near low-income CTs. The bank did not have a branch in a low-income CT. The percentage of branches in moderate-income CTs exceeds the percentage of the population in moderate-income CTs. Branch openings and closings have not adversely affected the accessibility of the bank's services, particularly in LMI geographies. The bank did not have any branch openings or closings during the evaluation period.

ABNA's services do not vary in a way that inconveniences its AAs, particularly LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

La Crosse MSA

The bank's retail service performance is good. The bank branches and alternative delivery systems are accessible to geographies and individuals of different income levels. ABNA had five branches and six deposit-taking ATMs throughout the AA. The percentage of bank branches in low-income geographies exceeds the percentage of the population in low-income geographies. In 2017, only 4.00 percent of CTs were designated as low-income CTs in the La Crosse MSA. The bank has one branch near a moderate-income CT and four additional branches are in central business districts with access to public transportation.

Branch openings and closings have not adversely affected the accessibility of the bank's services, particularly in LMI geographies. The bank did not have any branch openings or closings during the evaluation period.

ABNA's services do not vary in a way that inconveniences its AAs, particularly in LMI geographies and individuals. Management complements its traditional service delivery methods

with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Madison MSA

The bank's retail service performance is excellent. The bank's branches and alternative delivery systems are readily accessible to geographies and individuals of different income levels. ABNA had 22 branches and 28 deposit-taking ATMs throughout the AA. In 2017, only 3.01 percent of CTs were designated as low-income CTs in the Madison MSA. The bank has two branches near low-income CTs. The bank did not have a branch in a low-income CT. The percentage of branches in moderate-income geographies exceeds the percentage of the population in moderate-income geographies. Branch closures have not adversely affected the accessibility of the bank's delivery systems in LMI geographies.

Three branch closings occurred throughout the evaluation period, with one located in a moderate-income CT. However, this has not affected accessibility, as the bank still has a significantly greater percentage of branches in moderate-income geographies as compared to the percentage of the population in moderate-income geographies. For branch closures, the bank considers branch traffic and profitability, as well as proximity and accessibility of other branches. There were no branch openings during this evaluation period. The bank closed three branches during the evaluation period, one was in a moderate-income CT with little impact on the LMI areas.

ABNA's services do not vary in a way that inconveniences its AAs, particularly in LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Milwaukee MSA

The bank's retail service performance is adequate. The bank's branches and alternative delivery systems are reasonably accessible to geographies and individuals of different income levels. ABNA had 39 branches and 61 deposit-taking ATMs throughout the AA. The percentage of branches in LMI geographies was lower than the percentage of the population in LMI geographies. Branch openings and closings have not adversely affected the accessibility of the bank's services, particularly in LMI geographies. The bank did not have any branch openings one closing during the evaluation period.

ABNA's services do not vary in a way that inconveniences its AAs, particularly in LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Wisconsin non-MSA

The bank's retail service performance is excellent. The bank's branches and alternative delivery systems are readily accessible to geographies and individuals of different income levels. ABNA had 37 branches and 48 deposit-taking ATMs throughout the AA. There are no low-income CTs in the Wisconsin non-MSA. The ratings are supported by performance in the moderate-income CTs. The percentage of branches in moderate-income CTs exceeds the percentage of the

population in moderate-income CTs. Branch openings and closings have not adversely affected the accessibility of the bank's services, particularly in LMI geographies. The bank did not have any branch openings or closings during the evaluation period.

ABNA's services do not vary in a way that inconveniences its AAs, particularly in LMI geographies and individuals. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, bilingual ATMs, and telephone banking.

Community Development Services

Green Bay MSA

The bank's CD service performance is excellent. The bank was a leader in providing CD services. CD services are responsive to community needs. During the evaluation period, ABNA employees provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, 71 employees performed 2,475 hours of CD service throughout the evaluation period, benefitting 48 organizations.

La Crosse MSA

The bank's CD service performance is good. The bank provided a relatively high level of CD services. CD services are responsive to community needs. During the evaluation period, ABNA employees provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, five employees performed 141 hours of CD service throughout the evaluation period, benefitting five organizations.

Madison MSA

The bank's CD service performance is adequate. The bank provided a relatively high level of services. CD services are responsive to community needs. During the evaluation period, the bank had 22 employees provide financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, seven employees performed 276 hours of CD service throughout the evaluation period, benefitting 15 organizations.

Milwaukee MSA

The bank's CD service performance is excellent. The bank was a leader in providing CD services. CD services are responsive to community needs. During the evaluation period, ABNA provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, 88 employees provided 3,641 hours of CD services throughout the evaluation period, benefitting 87 organizations.

Wisconsin non-MSA

The bank's CD service performance is good. The bank provides a relatively high level of CD services. CD services are responsive to community needs. During the evaluation period, ABNA employees provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. In total, 37 employees performed 701 hours of CD service throughout the evaluation period, benefitting 26 organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test was consistent with the overall High Satisfactory rating. The bank's performance under the service test in the Appleton MSA, Janesville MSA, Oshkosh MSA, and Wausau MSA was stronger than their overall performance in the state of Wisconsin. These AA's have a higher percentage of branches in low- or moderate-income CTs. The bank's performance in the Racine MSA was consistent with their overall rating. The bank's performance in the Eau Claire MSA, Fond du Lac MSA and Sheboygan MSA was weaker than their overall rating in the state of Wisconsin. The weaker rating was due to a lower percentage of branches in low- or moderate-income geographies. Refer to Table 15 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/2015 to 12/31/2017) Investment and Service Tests and CD Loans: (07/28/2015 to 12/31/2017)	
Financial Institution	Products Reviewed	
Associated Bank, National Association Green Bay, Wisconsin	Home Purchase; Home Improvement; Home Refinance; Multifamily; Small Business; CD Loans; Qualified Investments; Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Associated Community Development, LLC	Subsidiary	CD Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
<u>Chicago MMSA</u>	full-scope	Cook, DeKalb, DuPage, Kane, Kendall, McHenry Counties, Lake County (IL) and Kenosha County (WI)
<u>Minneapolis MMSA</u>	full-scope	Anoka, Chisago, Dakota, Hennepin, Ramsey, Scott, Washington Counties (MN); Pierce and St. Croix Counties (WI)
<u>State of Illinois</u>		
Peoria MSA	full-scope	Peoria and Tazewell Counties
St. Louis MSA	full-scope	Madison, Monroe, St. Clair County

Rockford MSA	limited-scope	Winnebago County
<u>State of Minnesota</u>		
Rochester MSA	full-scope	Olmsted
MN non-MSA	limited-scope	Goodhue
<u>State of Wisconsin</u>		
Green Bay MSA	full-scope	Brown, Kewaunee, and Oconto
La Crosse MSA	full-scope	La Crosse
Madison MSA	full-scope	Columbia, Dane, Green and Iowa
Milwaukee MSA	full-scope	Milwaukee, Ozaukee, Washington, and Waukesha
WI Non-MSA	full-scope	Ashland, Clark, Crawford, Dodge, Door, Forest, Green, Iron, Jefferson, Lincoln, Manitowoc, Marinette, Oneida, Portage, Price, Richland, Sauk, Sawyer, Shawano, Taylor, Vernon, Vilas, Walworth, Waupaca, and Wood
Appleton MSA	limited-scope	Calumet and Outagamie
Eau Claire MSA	limited-scope	Chippewa and Eau Claire
Fond du Lac MSA	limited-scope	Fond du Lac
Janesville MSA		

Oshkosh MSA	limited-scope	Rock
Racine MSA	limited-scope	Winnebago
Sheboygan MSA	limited-scope	Racine
Wausau MSA	limited-scope	Sheboygan
	limited-scope	Marathon

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Associated Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
Associated Bank, National Association	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Chicago MMSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Minneapolis MMSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Illinois	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Minnesota	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Wisconsin	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

Chicago MMSA

Demographic Information for Full Scope Area: Chicago MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,887	13.51	24.01	32.17	29.99	0.32
Population by Geography	8,025,412	9.39	24.33	34.70	31.53	0.05
Owner-Occupied Housing by Geography	1,931,547	4.15	18.64	38.72	38.49	0.00
Business by Geography	436,719	4.62	15.84	33.52	45.90	0.12
Farms by Geography	7,301	2.63	13.89	45.25	38.23	0.00
Family Distribution by Income Level	1,922,519	23.05	17.10	19.53	40.32	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	771,964	15.98	34.71	33.58	15.74	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		73,705 76,037 12%	Median Housing Value Unemployment Rate (2010 US Census)		291,973 4.74%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

Chicago MMSA

Demographic Information for Full Scope Area: Chicago MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,890	14.76	24.92	27.99	31.38	0.95
Population by Geography	8,094,065	10.62	25.00	31.05	33.01	0.32
Owner-Occupied Housing by Geography	1,846,098	4.80	19.19	34.82	41.05	0.14
Business by Geography	450,412	4.96	16.48	30.37	47.66	0.52
Farms by Geography	7,685	3.21	15.34	43.62	37.79	0.04
Family Distribution by Income Level	1,909,625	24.22	16.55	18.41	40.82	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	778,499	18.01	34.60	29.91	17.27	0.22
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		76,659 79,152 13%	Median Housing Value Unemployment Rate (2015 ACS US Census)		247,223 5.13%	

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The ABNA AA within the Chicago MMSA consists of three MDs and eight total counties. The Chicago-Naperville-Arlington Heights, IL MD (Chicago MD) consists of Cook, DuPage, Kendall, and McHenry Counties. The Elgin, IL MD consists of DeKalb and Kane Counties. The Lake County-Kenosha County, IL-WI MD consists of Lake and Kenosha Counties. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate- income areas.

The AA was composed of 1,887 census tracts, of which 255 (13.51 percent) were low income, 453 (24.01 percent) moderate income, 607 (32.17 percent) middle income, and 566 (29.99 percent) upper income. According to the 2010 U.S. Census data, the area population was 8,025,412 with 753,586 (9.39 percent) residing in low-income census tracts, and 1,952,583 (24.33 percent) residing in moderate-income census tracts.

According to the 2015 ACS, the total number of census tracts has increased to 1,890. The number of low-income census tracts changed from 255 to 279 and the number of moderate-income census tracts changed from 453 to 471. There were 279 (14.76 percent) low income, 471 (24.92 percent) moderate income, 529 (27.99 percent) middle income, and 593 (31.38 percent) upper income census tracts. Population was slightly up from the 2010 census at 8,025,412 when compared to the 2015 ACS at 8,049,065, with 859,590 (10.68 percent), residing in low-income census tracts, and 2,023,516 (25 percent), residing in moderate-income census tracts. This reflects a population change of 0.29 percent.

As of June 30, 2017, there were 172 total depository institutions in the Chicago MMSA operating 2,317 branches. ABNA has 25 branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled \$4.19 billion, representing 1.14 percent of the market. ABNA's rank is 14th in the Chicago MMSA. The top five depository institutions with market shares greater than ABNA in the AA are as follows: JPMorgan Chase Bank, National Association (22.33 percent), Bank of America, National Association (11.57 percent), BMO Harris Bank National Association (11.51 percent), The Northern Trust Company (6.91 percent), and The PrivateBank and Trust Company (4.59 percent). These institutions accounted for 56.91 percent of total deposits.

Employment and Economic Factors

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate for Chicago MD as of December 2015 and 2017 was 5.8 percent and 4.7 percent, respectively. The national unemployment rate as of the same dates was 5.0 (December 2015) and 4.1 percent (December 2017).

According to the Moody's Analytics, the Chicago MD's expansion was maturing but underperforming the nation and other major metro areas and divisions. Slower job growth partly reflects a tighter labor market, with job creation ahead of labor force gains and wage growth accelerating. The unemployment rate was on its way down towards a historic low of 4.4%. The apartment building boom has spread beyond the city of Chicago's urban core to the suburbs, while the single-family market was more of a mixed bag. The top five employment sectors in the Chicago MD are Professional and Business Services, Education and Health Services, Government, Leisure and Hospitality Services, and Retail Trade. The top five employers in the Chicago MD are Advocate Health Care System, Northwestern Memorial Healthcare, University of Chicago, JPMorgan Chase & Co., and Amazon.

According to the Moody's Analytics, the Elgin MD will emerge as an above-average performer by mid-2018 as service providers' ramp up hiring and factory layoffs cease. Job creation will

broaden and strengthen despite restraint from state government. The Elgin MD will outperform Illinois over the longer term, and the metro division's proximity to Chicago, diverse industrial base, and low cost structure will enable it to stay a step ahead of the U.S. as well. The top five employment sectors in the Elgin MD are Government, Manufacturing, Professional and Business Services, Education and Health Services, and Leisure and Hospitality Services. The top five employers in the Elgin MD are Northern Illinois University, J.P. Morgan Chase, Caterpillar, Advocate Sherman Hospital, and Rush Copley Medical Center.

According to the Moody's Analytics, the Lake County-Kenosha County MD will maintain its role as one of Illinois' leaders this year. The federal tax overhaul was a plus for local biomedical giants but will weigh on the already sluggish housing recovery. Longer term, proximity to Chicago's dynamic and diverse economic base will help the Lake County-Kenosha County MD keep pace with the U.S. The top five employment sectors in the Lake County-Kenosha County MD are Professional and Business Services, Manufacturing, Government, Retail Trade, and Education and Health Services. The top five employers in the Lake County-Kenosha County MD are Abbott Laboratories, Naval Station Great Lakes, CDW Corp., Baxter Healthcare Corp., and Abbvie Inc.

Housing

According to the 2010 U.S. Census, 1,931,547 or 59.85 percent of the total housing units in the AA were owner occupied, 992,457 or 30.75 percent were renter occupied, and 303,415 or 9.40 percent were vacant units. Of all owner occupied units, 80,230 or 4.15 percent were located in low-income census tracts, and 359,959 or 18.64 percent were located in moderate-income census tracts. Of all occupied rental units, 175,270 or 17.66 percent were located in low-income census tracts, and 302,238 or 30.45 percent were located in moderate-income census tracts. Of all vacant units, 64,486 or 21.25 percent were located in low-income census tracts, and 84,963 or 28 percent were located in moderate-income census tracts. Additionally, 210,520 or 9.04 percent of the single family (1-4 units) homes and 107,494 or 12.34 percent of the multifamily (5 plus units) housing units were located in low-income census tracts, and 535,368 or 22.99 percent of all single family homes and 198,244 or 22.75 percent of multifamily housing units were located in moderate-income census. The 2010 U.S. Census indicates that the weighted average median housing value was \$291,973, and the weighted average monthly gross rent was \$946.

According to the 2015 ACS U.S. Census, 1,846,098 or 56.87 percent of the total housing units in the AA were owner occupied, 1,097,455 or 33.81 percent were renter occupied, and 302,846 or 9.33 percent were vacant units. Of all owner occupied units, 88,677 or 4.80 percent were located in low-income census tracts, and 354,316 or 19.19 percent were located in moderate-income census tracts. Of all occupied rental units, 194,279 or 17.70 percent were located in low-income census tracts, and 330,237 or 30.09 percent were located in moderate-income census tracts.

Of all vacant units, 69,272 or 22.87 percent were located in low-income census tracts, and 85,792 or 28.33 percent were located in moderate-income census tracts. Additionally, 245,272 or 10.51 percent of the single family (1-4 units) homes and 104,557 or 11.78 percent of the multifamily (5 plus units) housing units were located in low-income census tracts, and 547,680 or 23.48 percent of all single family homes and 211,096 or 23.79 percent of multifamily housing units were located in moderate-income census. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$247,223, and the weighted average monthly gross rent was \$1,049.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,576 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the Chicago MMSA) could afford a \$184,233 mortgage with a payment of \$989.40 per month. A moderate-income borrower making \$63,322 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the Chicago MMSA) could afford a \$294,884 mortgage with a payment of \$1,583.04 per month.

This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in both the Chicago and Elgin MDs with an estimated payment of \$1,390. The median list price in the Chicago and Elgin MDs was \$245,000 in 2016 and \$259,000 in 2017. Also, this illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in Lake County with an estimated payment of \$1,707. The median list price in Lake County was \$309,000 in 2016 and \$318,000 in 2017.

Lastly, this illustrates that low- and moderate-income borrowers would be able to qualify for a mortgage loan in Kenosha County with an estimated payment of \$977. The median list price in Lake County was \$174,000 in 2016 and \$182,000 in 2017.

Community Contact

Through our community contact program, we contacted a Representative from the City of St. Charles, and an Account Representative from a SBIC who identified banking needs of the Chicago MMSA.

The community contact from the City of St. Charles indicated that the primary credit needs of the City include long-term infrastructure financing, General Obligation Bonding capacity within IRS tax exemption regulations. Overall, the City was well served by financial institutions; however, the City does not directly participate in any programs with local financial institutions other than its own direct banks and borrowing needs for the City. The community contact explained the City has not identified any special involvement programs for local financial institutions.

The community contact from the Small Business Development Center indicated economic development, primarily small dollar loan programs, was the primary community need.

Minneapolis MMSA

Demographic Information for Full Scope Area: Minneapolis MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	717	8.79	19.25	44.07	27.34	0.56
Population by Geography	2,937,776	6.95	16.52	45.97	30.43	0.13
Owner-Occupied Housing by Geography	816,774	2.79	13.46	49.42	34.33	0.00
Business by Geography	211,689	5.05	15.35	44.66	34.93	0.02
Farms by Geography	5,629	1.65	9.63	56.49	32.23	0.00
Family Distribution by Income Level	729,115	19.30	17.46	22.86	40.38	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	268,030	11.38	24.23	46.78	17.61	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		79,301 85,200 9%	Median Housing Value Unemployment Rate (2010 US Census)		255,751 3.75%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

Minneapolis MMSA

Demographic Information for Full Scope Area: Minneapolis MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	717	7.81	23.57	43.38	24.27	0.98
Population by Geography	3,037,150	6.57	20.86	44.59	27.65	0.34
Owner-Occupied Housing by Geography	810,578	2.46	16.95	48.43	32.10	0.06
Business by Geography	217,695	4.98	18.20	46.13	30.34	0.35
Farms by Geography	5,764	1.68	14.87	54.41	28.97	0.07
Family Distribution by Income Level	753,254	20.55	17.27	21.93	40.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	284,844	9.97	29.25	44.04	16.64	0.10
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		85,636 89,800 10%	Median Housing Value Unemployment Rate (2015 ACS US Census)		229,355 3.31%	

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The Minneapolis MMSA consists of a portion of the Minneapolis-St. Paul-Bloomington, MN-WI MMSA and includes Anoka, Chisago, Dakota, Hennepin, Ramsey, Scott, and Washington Counties in Minnesota and Pierce and St. Croix Counties in Wisconsin. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. The 2010 U.S. Census recorded 717 census tracts in the AA, of which 63 (8.79 percent) were low-income tracts, 138 (19.25 percent) moderate-income tracts, 316 (44.07 percent) middle-income tracts, 196 (27.34 percent) upper-income tracts, and four (0.56 percent) were not applicable.

According to the 2010 census data, the area population was 2,937,776, with 204,255 or 6.95 percent residing in low-income census tracts and 485,205 or 16.52 percent, residing in moderate-income census tracts.

According to the 2015 ACS, the total number of census tracts has remained the same, but the census tracts have shifted. The 2015 ACS U.S. Census recorded 717 census tracts in the AA, of which 56 (7.81 percent) were low-income tracts, 169 (23.57 percent) moderate-income tracts, 311 (43.38 percent) middle-income tracts, 174 (24.27 percent) upper-income tracts, and seven (0.98 percent) were not applicable. Population was up from the 2010 census at 3,037,150, with 199,410 or 6.57 percent residing in low-income census tracts, and 633,562 or 20.86 percent residing in moderate-income census tracts.

According to 2015 ACS U.S. Census data, the total population of the AA was 3,037,150. The median income for a household was \$71,896, and for a family was \$90,048. According to the BLS report, the unemployment rate for this area as of December 2015, December 2016, and December 2017 was 3.20 percent, 3.50 percent, and 3.0 percent, respectively.

The distribution of families by income level was 6.12 percent low-income, 21.62 percent moderate-income, 45.60 percent middle-income, and 26.32 percent upper-income. The percentage of households in the AA living below the poverty level was 1.36 percent. The 2017 FFIEC adjusted median family income for the AA was \$89,900. Low-income families earned annual income of \$44,950 or less, and moderate-income families earned annual income of \$44,951 to \$71,920.

As of June 30, 2017, there were 124 total depository institutions in the AA operating 667 branches. ABNA has 22 branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled 1.61 billion, representing 0.88 percent of the market. ABNA is ranked seventh in the AA. The six depository institutions with market share more than ABNA in the AA are Wells Fargo Bank, National Association (41.46 percent), U.S. Bank National Association (38.13 percent), TCF National Bank (3.29 percent), Bremer Bank NA (2.23 percent), BMO Harris Bank National Association (1.69 percent), and Anchor Bank NA (0.92 percent). These institutions accounted for a combined 87.72 percent of total deposits.

Employment and Economic Factors

According to the BLS report, the unemployment rate for the state of Minnesota as of December 2015 and December 2017 was 3.70 percent and 3.30 percent, respectively. The unemployment rate for the state of Wisconsin as of December 2015 and December 2017 was 4.30 percent and 3.20 percent, respectively. The national unemployment rate as of the same dates was 5.00 percent (December 2015) and 4.10 percent (December 2017).

According to Moody's Analytics, job and output growth will improve in Minneapolis-St. Paul-Bloomington during the second half of 2018, mirroring the lift expected to the U.S. economy. Office-using business expansions and rising housing construction will help propel job growth ahead of the U.S. by 2019. Longer term, relatively low business costs in combination with a well-educated and young labor force and above-average population growth will keep Minnesota a top Midwest performer and in-line with the US.

The top five employment sectors in the Minneapolis MMSA are Education and Health Services, Professional and Business Services, Government, Manufacturing and Retail Trade. The top five employers in the Minneapolis MSA are Allina Health System, Target Corp, University of Minnesota, HealthPartners, and Fairview Health System.

Housing

The 2010 U.S. Census reported total housing units of 1,214,188 for the Minneapolis MMSA. Of the total number of housing units in the AA, 816,774 or 67.27 percent were owner occupied, 327,710 or 26.99 percent were renter occupied, and 69,704 or 5.74 percent were vacant. Of all owner occupied units, 22,775 or 2.79 percent were located in low-income census tracts, and 109,951 or 13.46 percent were located in moderate-income census tracts. Of all occupied rental units, 52,800 or 16.11 percent were located in low-income census tracts, and 89,503 or 27.31 percent were located in moderate-income census tracts. Of all vacant units, 8,865 or 12.72 percent were located in low-income census tracts, and 15,837 or 22.72 percent were located in moderate-income census tracts. Additionally, 44,033 or 4.80 percent of all single family (1-4 units) homes and 40,041 or 14.39 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 136,700 or 14.90 percent of all single family homes and 75,011 or 26.97 percent of multifamily housing units were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$255,751, and the weighted average monthly gross rent was \$862.

The 2015 ACS U.S. Census reported total housing units of 1,242,877 for the Minneapolis MMSA. Of the total number of housing units in the AA, 810,578 or 65.22 percent of the total housing units in the AA were owner occupied, 372,599 or 29.98 percent were renter occupied, and 59,700 or 4.80 percent were vacant. Of all owner occupied units, 49,763 or 6.14 percent were located in low-income census tracts, and 137,392 or 16.95 percent were located in moderate-income census tracts. Of all occupied rental units, 49,763 or 13.36 percent were located in low-income census tracts, and 117,026 or 31.41 percent were located in moderate-income census tracts. Of all vacant units, 6,299 or 10.55 percent were located in low-income census tracts, and 14,351 or 24.04 percent were located in moderate-income census tracts. Additionally, 39,202 or 4.20 percent of all single family (1-4 units) homes and 36,615 or 12.55 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 170,820 or 18.29 percent of all single family homes and 91,379 or 31.33 percent of multifamily housing units were located in moderate-income census tracts. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$229,355, and the weighted average monthly gross rent was \$962.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$44,900 per year could afford a \$209,194 mortgage with a payment of \$1,123 per month. A moderate-income borrower making \$65,040 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$334,562 mortgage with a payment of \$1,796 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,707. Moderate-income borrowers would be able to qualify for a mortgage loan in the AA. The median list price in the AA was \$284,000 and \$318,000 in 2016 and 2017, reflecting a percent change of 11.97 percent.

Community Contact

Through our community contact program, we identified banking needs of the Minneapolis MMSA. We conducted two community contacts. A local development agency indicated community needs include pooled funds for community development projects, or to provide business financing on a direct or subordinated basis. Furthermore, a local community-planning agency indicated credit needs of small business start-up funding and business financing for

growth and expansion. Overall, there are sufficient opportunities within the AA for financial institutions to participate in community development activities.

Illinois**Peoria MSA**

Demographic Information for Full Scope Area: Peoria MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	78	11.54	19.23	51.28	17.95	0.00
Population by Geography	321,888	6.09	17.27	53.39	23.25	0.00
Owner-Occupied Housing by Geography	93,005	2.82	15.86	57.62	23.70	0.00
Business by Geography	15,110	9.07	16.87	49.65	24.41	0.00
Farms by Geography	834	1.20	6.24	62.23	30.34	0.00
Family Distribution by Income Level	83,750	20.37	18.69	22.09	38.85	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,710	10.47	23.89	52.41	13.23	0.00
Median Family Income		66,038	Median Housing Value		123,833	
FFIEC Adjusted Median Family Income for 2016		69,500	Unemployment Rate (2010 US Census)		3.55%	
Households Below Poverty Level		11%				

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

Source: 2010 US Census and 2016 FFIEC updated MFI

Peoria MSA

Demographic Information for Full Scope Area: Peoria MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	78	16.67	19.23	41.03	23.08	0.00
Population by Geography	322,809	9.69	19.19	42.18	28.94	0.00
Owner-Occupied Housing by Geography	90,797	4.61	18.52	45.79	31.09	0.00
Business by Geography	15,108	13.13	16.96	41.33	28.58	0.00
Farms by Geography	831	2.41	7.70	50.66	39.23	0.00
Family Distribution by Income Level	83,576	21.57	17.60	21.13	39.69	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,741	14.77	27.84	40.58	16.81	0.00
Median Family Income		69,329	Median Housing Value		133,940	
FFIEC Adjusted Median Family Income for 2017		72,500	Unemployment Rate (2015 ACS US Census)		3.68%	
Households Below Poverty Level		13%				

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The ABNA AA within the Peoria MSA consists of two counties: Peoria and Tazewell counties. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The AA was composed of 78 census tracts, of which nine (11.54 percent) were low income, 15 (19.23 percent) moderate income, 40 (51.28 percent) middle income, and 14 (17.95 percent) upper income. According to the 2010 U.S. Census data, the area population was 321,888 with 19,603 (6.09 percent), residing in low-income census tracts, and 55,590 (17.27 percent) residing in moderate-income census tracts.

According to the 2015 ACS, the total number of census tracts remains at 78, but the number of low income census tracts changes from nine to 13. There were 13 (16.67 percent) low income, 15 (19.23 percent) moderate income, 32 (41.03 percent) middle income, and 18 (23.08 percent) upper income census tracts. Population was slightly up from the 2010 census at 321,888 when compared to the 2015 ACS at 322,809, with 31,280 (9.69 percent), residing in low-income census tracts, and 61,947 (19.19 percent), residing in moderate-income census tracts. This reflects a population change of 0.29 percent.

As of June 30, 2017, there were 31 total depository institutions in the AA operating 123 branches. ABNA has six branches in the AA. According to the June 30, 2017 FDIC Summary of Deposits Report, ABNA's deposits in the AA totaled \$193.90 million, representing 3.04 percent of the market. ABNA's rank was ninth in the AA. The top five banks by deposit market share are Morton Community Bank (32.53 percent), PNC Bank, National Association (17.46 percent), and South Side Trust & Savings Bank of Peoria (8.08 percent), Commerce Bank (6.48 percent), and JPMorgan Chase Bank, National Association (5.16 percent). These banks have a combined deposit market share of 69.71 percent.

Peoria County, Illinois

Peoria County encompasses 629 square miles running 32 miles north/south and 28 miles east/west. It is a mix of urban and rural. Peoria County is at the center of a multiple county region along the Illinois River midway between Chicago and St. Louis. Peoria County was the home of Bradley University, Illinois Central College, Robert Morris University, Midstate College, and the University Of Illinois College Of Medicine. Large employers include Caterpillar Inc. and the USDA's National Center for Agricultural Utilization Research Lab.

Tazewell County, Illinois

Tazewell County is located on the Illinois River adjacent to Peoria, IL. Tazewell County has a population of 135,394, according to the 2010 U.S. Census data, encompassing 658 square miles. The largest community in Tazewell County was Pekin, the County seat, with a population of more than 34,000. Agriculture is an important component of Tazewell County's history and economy with 78 percent of the County's land area consisting of farmland.

Employment and Economic Factors

According to the BLS report, the unemployment rate for this area as of December 2015 and 2017 was 6.9 percent and 4.8 percent, respectively. The national unemployment rate as of the same dates was five (December 2015) and 4.1 percent (December 2017).

According to the Moody's Analytics, the Peoria MSA's economy will strengthen this year but at a weaker pace than Illinois and the nation. Manufacturing will hold on to recent minor gains. Peoria will underperform over the longer term, and downside risk was greater than it was nationally because of the area's overreliance on the volatile heavy machinery industry. The top five employment sectors in the Peoria MSA are Education and Health Services, Manufacturing, Professional and Business Services, Government, and Retail Trade. The top five employers in

the Peoria MSA are Caterpillar Inc., OSF Saint Francis Medical Center, UnityPoint Health – Peoria, Methodist Medical Center, and Illinois Central College.

Housing

According to the 2010 U.S. Census, 93,005 or 66.62 percent of the total housing units in the AA were owner occupied, 35,733 or 25.59 percent were renter occupied, and 10,874 or 7.79 percent were vacant units. Of all owner occupied units, 2,623 or 2.82 percent were located in low-income census tracts, and 14,752 or 15.86 percent were located in moderate-income census tracts. Of all occupied rental units, 4,997 or 13.98 percent were located in low-income census tracts, and 8,512 or 23.82 percent were located in moderate-income census tracts. Of all vacant units, 1,650 or 15.17 percent were located in low-income census tracts, and 2,639 or 24.27 percent were located in moderate-income census tracts. Additionally, 7,097 or 6.01 percent of the single family (1-4 units) homes and 2,140 or 11.37 percent of the multifamily (5 plus units) housing units were located in low-income census tracts, and 22,480 or 19.03 percent of all single family homes and 3,051 or 16.21 percent of multifamily housing units were located in moderate-income census. The 2010 U.S. Census indicates that the weighted average median housing value was \$123,833, and the weighted average monthly gross rent was \$668.

According to the 2015 ACS U.S. Census, 90,797 or 64.20 percent of the total housing units in the AA were owner occupied, 39,624 or 28.02 percent were renter occupied, and 11,013 or 7.79 percent were vacant units. Of all owner occupied units, 4,187 or 4.61 percent were located in low-income census tracts, and 16,812 or 18.52 percent were located in moderate-income census tracts. Of all occupied rental units, 7,551 or 19.06 percent were located in low-income census tracts, and 9,472 or 23.90 percent were located in moderate-income census tracts. Of all vacant units, 2,715 or 24.65 percent were located in low-income census tracts, and 2,405 or 21.84 percent were located in moderate-income census tracts. Additionally, 10,598 or 8.90 percent of the single family (1-4 units) homes and 3,727 or 18.80 percent of the multifamily (5 plus units) housing units were located in low-income census tracts, and 24,375 or 20.48 percent of all single family homes and 3,969 or 20.02 percent of multifamily housing units were located in moderate-income census. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$133,940, and the weighted average monthly gross rent was \$711.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,250 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$168,771 mortgage with a payment of \$906.25 per month. A moderate-income borrower making \$58,000 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$270,108 mortgage with a payment of \$1,450 per month. This illustrates that low- and moderate-income borrowers would be able to qualify for a mortgage loan in the AA with an estimated payment of \$671. The median housing value in the AA is \$120,000 and \$125,000 in 2016 and 2017 reflecting a percent change of 4.17 percent from 2016 to 2017 according to Zillow.com data.

Community Contact

Through our community contact program, we contacted the city government department for the City of Peoria, who identified banking needs of the Peoria MSA. The community contact indicated community needs include affordable housing down payment assistance and bank partnership with grant based efforts and GAP financing and subsidy on affordable housing

construction and rehab. The community contact explained the city was missing an institution willing to collaborate with non-profit organizations within the city at the ground level.

St Louis MSA

Demographic Information for Full Scope Area: St Louis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	127	14.96	19.69	44.88	20.47	0.00
Population by Geography	572,295	8.86	18.00	48.45	24.69	0.00
Owner-Occupied Housing by Geography	159,475	6.27	16.88	50.55	26.30	0.00
Business by Geography	26,287	6.42	17.61	50.07	25.91	0.00
Farms by Geography	1,345	1.19	7.21	53.75	37.84	0.00
Family Distribution by Income Level	149,983	23.48	17.28	21.69	37.55	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	61,132	15.94	25.35	44.73	13.98	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		66,798 70,000 13%	Median Housing Value Unemployment Rate (2010 US Census)		130,025 3.89%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

St Louis MSA

Demographic Information for Full Scope Area: St Louis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	127	17.32	22.05	39.37	21.26	0.00
Population by Geography	567,924	11.91	18.88	43.06	26.15	0.00
Owner-Occupied Housing by Geography	154,147	7.99	17.32	46.63	28.06	0.00
Business by Geography	26,457	9.19	19.82	45.45	25.54	0.00
Farms by Geography	1,371	2.55	7.44	54.05	35.96	0.00
Family Distribution by Income Level	147,252	23.72	17.53	20.00	38.74	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	60,744	19.64	25.66	39.33	15.37	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		70,718 74,300 14%	Median Housing Value Unemployment Rate (2015 ACS US Census)		128,826 4.31%	

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The ABNA AA within the St. Louis MSA consists of three counties: Madison, Monroe, and St. Clair counties. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The AA was composed of 127 census tracts, of which 19 (14.96 percent) were low-income, 25 (19.69 percent) moderate-income, 57 (44.88 percent) middle-income, and 26 (20.47 percent) upper-income. According to the 2010 U.S. Census data, the area population was 572,295 with 50,705 (8.86 percent) residing in low-income census tracts, and 103,013 (18 percent) residing in moderate-income census tracts.

According to the 2015 ACS, the total number of census tracts remains at 127, but the number of low-income census tracts changes from 19 to 22 and the number of moderate-income census tracts changes for 25 to 28. There were 22 (17.32 percent) low-income, 28 (22.05 percent) moderate-income, 50 (39.37 percent) middle-income, and 27 (21.26 percent) upper-income census tracts. Population was slightly down from the 2010 census at 572,295 when compared to the 2015 ACS at 567,924, with 67,640 (11.91 percent), residing in low-income census tracts, and 107,224 (18.88 percent), residing in moderate-income census tracts. This reflects a population change of -0.76 percent.

As of June 30, 2017, there were 41 total depository institutions in the AA operating 198 branches. ABNA has eight branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled \$358.90 million, representing 3.63 percent deposit market share. ABNA's rank was sixth in the AA. The top five banks by deposit market share are The Bank of Edwardsville (16.44 percent), Regions Bank (12.75 percent), U.S. Bank National Association (6.66 percent), First Collinsville Bank (6.58 percent), and First Mid-Illinois Bank & Trust, National Association (6.58 percent). These institutions accounted for 49.01 percent of total deposits.

Madison County, Illinois

The Madison County seat was Edwardsville, and its largest city was Granite City. It was bordered on the west by the Mississippi River. According to the 2010 U.S. Census, it had a population of 269,282. Madison County was the home of Southern Illinois University – Edwardsville (SIUE).

Monroe County, Illinois

Monroe County was located in Southwest Illinois and was bordered on the west by the Mississippi River. The county seat and the largest city was Waterloo. According to the 2010 U.S. census, it had a population of 32,957.

St. Clair County, Illinois

St. Clair County was the oldest county in the state of Illinois. The county seat was Cahokia. St. Clair County's western border was formed by the Mississippi River. According to the 2010 U.S. census, it had a population of 270,056. St. Clair County was home to Scott Air Force Base.

Employment and Economic Factors

According to the BLS, the unemployment rate for this area as of December 2015 and 2017 was 4.2 percent and 3.4 percent, respectively. The national unemployment rate as of the same dates was 5.0 (December 2015) and 4.1 percent (December 2017).

According to the Moody's Analytics, faster income growth in St. Louis MSA bodes well for spending in 2018, particularly for tourism and consumer industries more broadly. Despite some sore spots in credit quality, higher pay should boost sales and homebuilding in late 2018. Easing federal regulation and low costs will bolster financial services. The top five employment sectors in the St. Louis MSA are Education and Health Services, Professional and Business Services, Government, Leisure and Hospitality Services and Retail Trade. The top five employers in the St. Louis MSA are BJC Healthcare, Wal-Mart Stores Inc., SSM Health Care System, Washington University in St. Louis, and Boeing Defense, Space & Security.

Housing

According to the 2010 U.S. Census, 159,475 or 65.13 percent of the total housing units in the AA were owner occupied, 62,867 or 25.68 percent were renter occupied, and 22,510 or 9.19 percent were vacant units. Of all owner occupied units, 10,005 or 6.27 percent were located in low-income census tracts, and 26,925 or 16.88 percent were located in moderate-income census tracts. Of all occupied rental units, 9,957 or 15.84 percent were located in low-income census tracts, and 15,176 or 24.14 percent were located in moderate-income census tracts. Of all vacant units, 4,587 or 20.38 percent were located in low-income census tracts, and 6,024 or 26.76 percent were located in moderate-income census tracts. Additionally, 19,622 or 9.29 percent of the single family (1-4 units) homes and 3,970 or 17.67 percent of the multifamily (5 plus units) housing units were located in low-income census tracts, and 41,404 or 19.60 percent of all single family homes and 4,348 or 19.36 percent of multifamily housing units were located in moderate-income census. The 2010 U.S. Census indicates that the weighted average median housing value was \$130,025, and the weighted average monthly gross rent was \$713.

According to the 2015 ACS U.S. Census, 154,147 or 61.77 percent of the total housing units in the AA were owner occupied, 67,930 or 27.22 percent were renter occupied, and 27,469 or 11.01 percent were vacant units. Of all owner occupied units, 12,315 or 7.99 percent were located in low-income census tracts, and 26,702 or 17.32 percent were located in moderate-income census tracts. Of all occupied rental units, 13,775 or 20.28 percent were located in low-income census tracts, and 17,444 or 25.68 percent were located in moderate-income census tracts. Of all vacant units, 6,594 or 24.01 percent were located in low-income census tracts, and 7,709 or 28.06 percent were located in moderate-income census tracts. Additionally, 25,889 or 12.04 percent of the single family (1-4 units) homes and 4,917 or 20.72 percent of the multifamily (5 plus units) housing units were located in low-income census tracts, and 44,282 or 20.60 percent of all single family homes and 5,503 or 23.19 percent of multifamily housing units were located in moderate-income census. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$128,826, and the weighted average monthly gross rent was \$795.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,150 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$173,056 mortgage with a payment of \$929 per month. A moderate-income borrower making \$59,440 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$276,814 mortgage with a payment of \$1,486 per month. This illustrates that low- and moderate-income borrowers would be able to qualify for a mortgage loan in the AA with an estimated payment of \$746. The median list price in the AA was \$129,000 in 2016 and \$139,000 in 2017 reflecting a percent change of 7.75 percent from 2016 to 2017 according to Zillow.com data.

Community Contact

Through our community contact program, we contacted a small business member of the chamber of commerce who identified banking needs of general financing for small businesses, affordable housing, and partnerships with local banks to spur cooperation and economic development in the city. Overall, there are sufficient opportunities within the AA for financial institutions to participate in economic development activities, specifically providing financing for small business and community projects.

Minnesota**Rochester MSA**

Demographic Information for Full Scope Area: Rochester MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	33	0.00	12.12	63.64	24.24	0.00
Population by Geography	144,248	0.00	10.77	59.77	29.46	0.00
Owner-Occupied Housing by Geography	42,920	0.00	8.04	61.03	30.93	0.00
Business by Geography	8,497	0.00	8.50	61.43	30.07	0.00
Farms by Geography	528	0.00	1.70	62.50	35.80	0.00
Family Distribution by Income Level	37,314	15.35	17.80	23.48	43.38	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,369	0.00	14.97	68.32	16.70	0.00
Median Family Income		74,450	Median Housing Value		186,333	
FFIEC Adjusted Median Family Income for 2016		81,100	Unemployment Rate (2010 US Census)		2.27%	
Households Below Poverty Level		7%				

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

Source: 2010 US Census and 2016 FFIEC updated MFI

Rochester MSA

Demographic Information for Full Scope Area: Rochester MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	33	0.00	24.24	42.42	33.33	0.00
Population by Geography	148,736	0.00	23.38	38.52	38.10	0.00
Owner-Occupied Housing by Geography	42,696	0.00	17.81	39.74	42.45	0.00
Business by Geography	8,613	0.00	22.94	41.65	35.41	0.00
Farms by Geography	502	0.00	6.97	57.57	35.46	0.00
Family Distribution by Income Level	38,499	17.60	17.09	22.95	42.36	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	13,355	0.00	34.14	41.59	24.28	0.00
Median Family Income		81,036	Median Housing Value		187,324	
FFIEC Adjusted Median Family Income for 2017		84,100	Unemployment Rate (2015 ACS US Census)		2.31%	
Households Below Poverty Level		9%				

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The ABNA AA of Rochester MSA is composed of Olmsted County. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The AA is composed of 33 census tracts, of which zero were low-income, four (12.12 percent) moderate-income, 21 (63.64 percent) middle-income, and eight (24.24 percent) upper-income.

According to the 2010 U.S. census data, the area population was 144,248 with 15,536 or 10.77 percent, residing in moderate-income census tracts.

According to the 2015 ACS, the total number of census tracts remains at 33. There were still zero low-income, but the number of moderate-income census tracts doubled from four to (24.24 percent), 14 (42.42 percent) middle-income and 11 (33.33 percent) upper-income census tracts. Population was slightly up from the 2010 U.S. census at 144,248 when compared to the 2015 ACS at 148,736, with 34,774 or 23.38 percent, residing in moderate-income census tracts. This reflects a population change of 3.11 percent.

As of June 30, 2017, there were 19 total depository institutions in the AA operating 53 branches. ABNA has four branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled \$127.75 million, representing 3.16 percent of the market. ABNA's rank is eighth in the AA. The top five depository institutions by deposit market share are Think Mutual Bank (28.82 percent), Wells Fargo Bank, National Association (22.93 percent), U.S. Bank National Association (11.29 percent), Bremer Bank, National Association (9.58 percent) and Home Federal Savings Bank (7.24 percent). These institutions accounted for 79.86 percent of total deposits.

Olmsted County, Minnesota

According to the 2010 U.S. Census, the population was 144,248. The Olmsted County seat and largest city was Rochester.

Employment and Economic Factors

According to the BLS, the unemployment rate for this area as of December 2015 and 2017 was 3.0 percent and 2.9 percent, respectively. The national unemployment rate as of the same dates was five (December 2015) and 4.1 percent (December 2017).

According to the Moody's Analytics, the Rochester MSA's economy will strengthen in coming quarters. Healthcare and tech expansions, and big gains in construction, will attract workers, and job and income growth will surpass the U.S. averages in 2019. Longer term, the Rochester MSA will be an above-average performer thanks to low living costs, a highly educated workforce, and positive demographic trends. The top five employment sectors in the Rochester MSA are Education and Health Services, Government, Retail Trade, Manufacturing, and Leisure and Hospitality Services. The top five employers in the Rochester MSA are the Mayo Clinic, IBM, Global Foundries, Olmsted Medical Center, and McNellus Truck & Manufacturing Inc.

Housing

According to the 2010 U.S. Census, 42,920 or 71.95 percent of the total housing units in the AA were owner occupied, 13,146 or 22.04 percent were renter occupied, and 3,584 or 6.01 percent were vacant units. Of all owner occupied units, zero was located in low-income census tracts, and 3,452 or 8.04 percent were located in moderate-income census tracts. Of all occupied rental units, zero was located in low-income census tracts, and 2,797 or 21.28 percent were located in moderate-income census tracts. Of all vacant units, zero was located in low-income census tracts, and 638 or 17.8 percent were located in moderate-income census tracts. Additionally, zero of the single family (1-4 units) homes and multifamily (five plus units) housing units were located in low-income census tracts, and 5,254 or 10.95 percent of all single-family homes and 1,599 or 16.55 percent of multifamily housing units were located in moderate-income census. The 2010 U.S. Census indicates that the weighted average median housing value was \$186,333, and the weighted average monthly gross rent was \$760.

According to the 2015 ACS U.S. Census, 42,696 or 69.50 percent of the total housing units in the AA were owner occupied, 15,203 or 24.75 percent were renter occupied, and 3,534 or 5.75 percent were vacant units. Of all owner occupied units, zero was located in low-income census tracts, and 7,604 or 17.81 percent were located in moderate-income census tracts. Of all occupied rental units, zero was located in low-income census tracts, and 6,528 or 42.94 percent were located in moderate-income census tracts. Of all vacant units, zero was located in low-income census tracts, and 1,023 or 28.95 percent were located in moderate-income census tracts. Additionally, zero of the single family (1-4 units) homes or multifamily (5 plus units) housing units were located in low-income census tracts, and 10,227 or 20.70 percent of all single family homes and 4,315 or 43.97 percent of multifamily housing units were located in moderate-income census. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$187,324, and the weighted average monthly gross rent was \$870.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$42,050 per year (or less than 50 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$195,782 mortgage with a payment of \$1,051 per month. A moderate-income borrower making \$67,280 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$313,326 mortgage with a payment of \$1,682 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,444; however, moderate-income borrowers would be able to qualify. The median list price in the AA is \$235,000 and \$269,000 in 2016 and 2017 reflecting a percent change of 14.47 percent from 2016 to 2017 according to Zillow.com data.

Community Contact

Through our community contact program, we contacted a city council member who identified banking needs of the Rochester MSA. The community contact indicated one of the most pressing concerns for the community, is the need for public transportation. It was explained that public transportation in Rochester is not adequate for movement across the city. There is also a great need for affordable housing, the unemployment rate is low, but the availability of affordable housing is limited.

Wisconsin**Green Bay MSA**

Demographic Information for Full Scope Area: Green Bay MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	68	2.94	26.47	51.47	17.65	1.47
Population by Geography	306,241	1.44	21.93	52.93	23.34	0.36
Owner-Occupied Housing by Geography	84,779	0.73	20.16	55.51	23.61	0.00
Business by Geography	16,190	1.20	21.03	55.04	22.72	0.01
Farms by Geography	1,040	0.38	15.48	61.15	22.98	0.00
Family Distribution by Income Level	80,745	19.23	18.25	23.75	38.78	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	30,257	2.33	32.97	50.44	14.25	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		64,441 66,900 11%	Median Housing Value Unemployment Rate (2010 US Census)		155,350 3.43%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

Green Bay MSA

Demographic Information for Full Scope Area: Green Bay MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	70	4.29	25.71	50.00	15.71	4.29
Population by Geography	312,676	1.87	24.08	50.50	23.15	0.40
Owner-Occupied Housing by Geography	85,931	0.90	19.77	54.74	24.59	0.00
Business by Geography	16,217	2.79	25.01	50.48	21.71	0.01
Farms by Geography	1,000	0.40	14.90	58.30	26.40	0.00
Family Distribution by Income Level	81,408	19.79	18.42	21.98	39.81	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	31,109	3.22	33.30	48.69	14.79	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		67,666 68,800 11%	Median Housing Value Unemployment Rate (2015 ACS US Census)		154,870 3.23%	

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The ABNA AA of Green Bay MSA is composed of Brown, Kewaunee, and Oconto counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. The 2010 U.S. Census recorded 68 census tracts in the AA, of which 2 (2.94 percent) were low-income tracts, 18 (26.47 percent) moderate-income tracts, 35 (51.47 percent) middle-income tracts, 12 (17.65 percent) upper-income tracts, and one (1.47 percent) not applicable. According to the 2010 U.S. census data, the area population was 306,241 with

4,410 or 1.44 percent residing in low-income census tracts and 67,159 or 21.93 percent residing in moderate-income census tracts.

According to the 2015 ACS, the total number of census tracts increased by two and there were a number of changes to census tracts. The 2015 A.C.S. U.S. Census recorded 70 census tracts in the AA, of which 3 (4.29 percent) were low-income tracts, 18 (25.71 percent) moderate-income tracts, 35 (50.00 percent) middle-income tracts, 11 (15.71 percent) upper-income tracts, and 3 (4.29 percent) not applicable. Population was slightly up from the 2010 census at 312,676, with 5,847 or 1.87 percent residing in low-income census tracts and 75,292 or 24.08 percent residing in moderate-income census tracts.

According to 2015 ACS U.S. Census data, the total population of the AA was 312,676. The median income for a household in the MSA was \$56,308, and for a family was \$69,360. According to the BLS, the unemployment rate for this area as of December 2015 and December 2017 was 3.70 percent and 2.50 percent, respectively.

The distribution of families by income level was 1.54 percent low-income, 21.82 percent moderate-income, 52.59 percent middle-income, and 24.05 percent upper-income. The 2017 FFIEC adjusted median family income for the AA was \$68,800. Low-income families earned annual income of \$34,400 or less, and moderate-income families earned annual income of \$34,401 to \$55,040.

As of June 30, 2017, there were 22 total depository institutions in the AA operating 106 branches. ABNA has 15 branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled 2.54 billion, representing 32.59 percent of the market. ABNA is ranked first in the AA. The top five banks by deposit market share are Associated Bank, National Association (32.59 percent), Nicolet National Bank (15.02 percent), BMO Harris Bank National Association (12.21 percent), Wells Fargo Bank, National Association (5.99 percent), JPMorgan Chase Bank, National Association (4.62 percent). These institutions accounted for a combined 70.43 percent of deposit market share in the AA.

Brown County, Wisconsin

Brown County is the fourth largest county in Wisconsin with a population of 248,007 as of the 2010 census. The largest employer in Brown County is the Oneida Tribe of Indians of Wisconsin. Brown County offers higher education opportunities at three major institutions: The University of Wisconsin – Green Bay, St. Norbert College, and Northeastern Wisconsin Technical College.

Kewaunee County, Wisconsin

Kewaunee County has a population of 20,574 as of the 2010 census. The top three private employers in the area for 2015 were WS Packaging Group, Kewaunee Fabrications, and Plastics Corp.

Oconto County, Wisconsin

Oconto County has a population of 37,660 as of the 2010 census. Manufacturing is the largest employment sector followed by agriculture, forestry, fishing, and hunting, and health care and social assistance.

Employment and Economic Factors

According to the BLS, the unemployment rate for the state of Wisconsin as of December 2015 and December 2017 was 4.30 percent and 3.20 percent, respectively. The national

unemployment rate as of the same dates was 5.00 percent (December 2015) and 4.10 percent (December 2017).

According to Moody's Analytics, manufacturing, trade and consumer services will drive faster growth in Green Bay in 2018. Longer term, low business and living costs in combination with access to a port will help Green Bay outshine the state and the Midwest, but the decline of manufacturing and a low-skill workforce will keep it from besting the U.S. The top five employment sectors in the Green Bay MSA are Manufacturing, Education and Health Services, Government, Professional and Business Services, and Leisure and Hospitality Services. The top five employers in the Green Bay MSA are Humana Inc., Bellin Health, Oneida Tribe of Indians of Wisconsin, Schneider National Inc., and Georgia Pacific Corp.

Housing

The 2010 U.S. Census reported total housing units of 135,614 for the Green Bay MSA. Of the total number of housing units, 84,779 or 62.51 percent of the total housing units in the AA are owner occupied, 36,874 or 27.19 percent are renter occupied, and 13,961 or 10.29 percent are vacant. Of all owner occupied units, 617 or 0.73 percent were located in low-income census tracts and 17,088 or 20.16 percent were located in moderate-income census tracts. Of all occupied rental units, 1,080 or 2.93 percent were located in low-income census tracts, and 11,918 or 32.32 percent were located in moderate-income census tracts. Of all vacant units, 300 or 2.15 percent were located in low-income census tracts, and 7,738 or 55.43 percent were located in moderate-income census tracts. Additionally, 1,617 or 1.47 percent of all single family (1-4 units) homes and 380 or 1.92 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 28,650 or 25.97 percent of all single family homes and 5,427 or 27.44 percent of multifamily housing units were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$155,350, and the weighted average monthly gross rent was \$656.

The 2015 ACS U.S. Census reported total housing units of 139,572 for the Green Bay MSA. Of the total number of housing units, 85,931 or 61.57 percent of the total housing units in the AA were owner occupied, 38,333 or 27.46 percent were renter occupied, and 15,308 or 10.97 percent were vacant. Of all owner occupied units, 776 or 0.90 percent were located in low-income census tracts and 16,990 or 19.77 percent were located in moderate-income census tracts. Of all occupied rental units, 1,602 or 4.18 percent were located in low-income census tracts, and 14,843 or 38.72 percent were located in moderate-income census tracts. Of all vacant units, 354 or 2.31 percent were located in low-income census tracts, and 4,815 or 31.45 percent were located in moderate-income census tracts. Additionally, 2,372 or 2.11 percent of all single family (1-4 units) homes and 354 or 1.62 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 25,886 or 22.98 percent of all single-family homes and 8,978 or 41.09 percent of multifamily housing units were located in moderate-income census tracts. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$154,870, and the weighted average monthly gross rent was \$707.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,400 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$160,229 mortgage with a payment of \$860 per month. A moderate-income borrower making \$55,040 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$256,270 mortgage with a payment of \$1,376 per month. This illustrates that LMI borrowers would be able to qualify for a

mortgage loan in the AA with an estimated payment of \$680. The median list price in the AA is \$121,000 and \$129,000 in 2016 and 2017 reflecting a percent change of 6.61 percent.

Community Contact

Through our community contact program, we identified banking needs of the Green Bay MSA. Our contact included a local Community Housing Development Organization, who indicated community needs include flexible mortgage loans, cash and in-kind support for housing counseling for first time home buyers, reverse mortgages, foreclosure prevention, and for personal financial education, credit builder loan programs, and loans, grants, and technical assistance for nonprofit organizations. Overall, there are sufficient opportunities within the AA for financial institutions to participate in Community Development activities.

La Crosse MSA

Demographic Information for Full Scope Area: La Crosse MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	25	4.00	16.00	60.00	20.00	0.00
Population by Geography	114,638	4.80	13.86	64.64	16.71	0.00
Owner-Occupied Housing by Geography	30,061	0.66	4.94	74.53	19.87	0.00
Business by Geography	5,815	3.73	22.89	61.19	12.19	0.00
Farms by Geography	270	0.37	2.22	83.70	13.70	0.00
Family Distribution by Income Level	27,454	17.97	18.47	24.53	39.03	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,004	2.62	14.23	70.19	12.95	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		65,427 67,700 13%	Median Housing Value Unemployment Rate (2010 US Census)		146,706 2.92%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

La Crosse MSA

Demographic Information for Full Scope Area: La Crosse MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	25	4.00	16.00	56.00	20.00	4.00
Population by Geography	117,048	2.14	15.71	60.28	17.71	4.16
Owner-Occupied Housing by Geography	30,084	0.38	7.79	68.16	23.23	0.43
Business by Geography	5,875	12.70	17.40	56.09	12.87	0.95
Farms by Geography	271	0.74	3.32	78.97	16.24	0.74
Family Distribution by Income Level	28,033	18.34	18.90	22.11	40.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,439	2.20	18.04	66.15	12.66	0.95

Median Family Income	68,531	Median Housing Value	155,655
FFIEC Adjusted Median Family Income for 2017	72,000	Unemployment Rate (2015 ACS US	3.03%
Households Below Poverty Level	13%	Census)	

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The bank has chosen one county in the La Crosse MSA, which is La Crosse County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. The 2010 U.S. Census recorded 25 census tracts in the AA, 1 (4.00 percent) low-income census tract, four (16.00 percent) moderate-income census tracts, 15 (60.00 percent) middle-income census tracts, 5 (20.00 percent) upper-income census tracts, and zero not applicable. According to the 2010 U.S. census data, the area population was 114,638, with 5,498 or 4.80 percent residing in low-income census tracts and 15,884 or 13.86 percent residing in moderate-income census tracts.

According to the 2015 ACS U.S Census, the total number of census tracts remains at 25, but there is one less middle-income tract and one more not applicable. The 2015 ACS U.S. Census recorded 25 census tracts in the AA, of which 1 (4.00 percent) low-income census tract, 4 (16.00 percent) moderate-income census tracts, 14 (56.00 percent) middle-income census tracts, 5 (20.00 percent) upper-income census tracts, and 1 (4.00 percent) not applicable. Population was slightly up from the 2010 census with 117,048, of which 2,505 or 2.14 percent resided in low-income census tracts and 18,388 or 15.71 percent resided in moderate-income census tracts.

According to 2015 ACS U.S. Census data, the total population of the AA was 117,048. The median income for a household in the county was \$53,837, and for a family was \$70,115. According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate for this area as of December 2015 and December 2017 was 3.70 percent and 2.40 percent, respectively.

The distribution of families by income level was 1.08 percent low-income, 10.31 percent moderate-income, 67.20 percent middle-income, 20.89 percent upper-income, and 0.52 percent NA. The 2017 FFIEC adjusted median family income for the AA was \$67,700. Low-income families earned annual income of \$33,850 or less, and moderate-income families earned annual income of \$33,851 to \$54,160.

As of June 30, 2017, there were 14 total depository institutions in the AA operating 37 branches. ABNA has five branches in the AA. According to the June 30, 2017 FDIC Summary of Deposits Report, ABNA's deposits in the AA totaled 288.58 million, representing 11.12 percent of the market. ABNA is ranked third in the AA. The top five banks by deposit market share are U.S. Bank National Association (19.10 percent), Wells Fargo Bank, National Association (15.46 percent), Associated Bank, National Association (11.12 percent) Coulee Bank (10.01 percent), and River Bank (9.32 percent). These five institutions accounted for a combined 65.01 percent of the deposit market share in the AA.

Employment and Economic Factors

According to the BLS report, the unemployment rate for the state of Wisconsin as of December 2015 and December 2017 was 4.30 percent and 3.20 percent, respectively. The national unemployment rate as of the same dates was 5.00 percent (December 2015) and 4.10 percent (December 2017).

According to Moody's Analytics, La Crosse-Onalaska will maintain its momentum in the coming quarters. Private services will do most of the heavy lifting and the drag from manufacturing will fade. Healthcare will lend stability thanks to an expanding elderly contingent. Over the long run, slow population growth and an outsize dependence on government will limit the metro area's performance to slightly below that of the U.S. average.

The top five employment sectors in the La Crosse MSA are Education and Health Services, Government, Retail Trade, Manufacturing, and Leisure and Hospitality Services. The top five employers in the La Crosse MSA are Gunderson Health System, Ashley Furniture Industries Inc., Mayo Clinic Health System, Trane, and Fort McCoy.

Housing

The 2010 U.S. Census reported total housing units of 47,745 for the La Crosse MSA. Of the total number of housing units, 30,061 or 62.96 percent were owner occupied, 15,440 or 32.34 percent were renter occupied, and 2,244 or 4.70 percent were vacant. Of all owner occupied units, 198 or 0.66 percent were located in low-income census tracts, and 1,485 or 4.94 percent were located in moderate-income census tracts. Of all occupied rental units, 1,791 or 11.60 percent were located in low-income census tracts, and 4,456 or 28.86 percent were located in moderate-income census tracts. Of all vacant units, 158 or 7.04 percent were located in low-income census tracts, and 556 or 24.78 percent were located in moderate-income census tracts. Additionally, 1,154 or 3.07 percent of all single family (1-4 units) homes and 974 or 12.55 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 3,936 or 10.48 percent of all single family homes and 2,512 or 32.38 percent of multifamily housing units were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$146,706, and the weighted average monthly gross rent was \$660.

The 2015 ACS U.S. Census reported total housing units of 49,008 for the La Crosse MSA. Of the total number of housing units, 30,084 or 61.39 percent of the total housing units in the AA were owner occupied, 16,261 or 33.18 percent were renter occupied, and 2,663 or 5.43 percent were vacant. Of all owner occupied units, 115 or 0.38 percent were located in low-income census tracts, and 2,344 or 7.79 percent were located in moderate-income census tracts. Of all occupied rental units, 1,005 or 6.18 percent were located in low-income census tracts, and 5,491 or 33.77 percent were located in moderate-income census tracts. Of all vacant units, 193 or 7.25 percent were located in low-income census tracts, and 736 or 27.64 percent were located in moderate-income census tracts. Additionally, 471 or 1.23 percent of all single family (1-4 units) homes and 842 or 9.85 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 4,900 or 12.83 percent of all single family homes and 3,466 or 40.55 percent of multifamily housing units were located in moderate-income census tracts. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$155,655, and the weighted average monthly gross rent was \$761.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,000 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$167,653 mortgage with a payment of \$900 per month. A moderate-income borrower making \$57,600 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$268,246 mortgage with a payment of \$1,440 per month. This illustrates that LMI borrowers would be able to qualify for a

mortgage loan in the AA with an estimated payment of \$800. The median list price in the AA is \$144,000 and \$149,000 in 2016 and 2017 reflecting a percent change of 3.47 percent.

Community Contact

Through our community contact program, we identified some banking needs of the La Crosse MSA. A local small business development center operator indicated community credit needs of affordable housing and small business lending. Overall, there are sufficient opportunities within the AA for financial institutions to participate in Community Development activities.

Madison MSA

Demographic Information for Full Scope Area: Madison MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	133	6.02	16.54	54.89	20.30	2.26
Population by Geography	605,435	5.15	15.36	57.85	21.12	0.52
Owner-Occupied Housing by Geography	158,054	1.31	13.39	62.40	22.91	0.00
Business by Geography	39,150	3.90	15.98	55.68	23.82	0.62
Farms by Geography	2,507	0.28	14.76	67.81	16.99	0.16
Family Distribution by Income Level	146,251	18.45	18.13	24.84	38.57	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	53,506	4.01	23.69	59.63	12.67	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		76,735 80,300 11%	Median Housing Value Unemployment Rate (2010 US Census)		221,114 2.91%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

Madison MSA

Demographic Information for Full Scope Area: Madison MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	133	3.01	20.30	50.38	21.80	4.51
Population by Geography	627,618	3.38	16.44	53.81	23.47	2.90
Owner-Occupied Housing by Geography	157,819	0.64	13.73	60.04	25.58	0.01
Business by Geography	41,219	2.19	17.68	50.36	27.99	1.79
Farms by Geography	2,537	0.28	15.53	61.45	22.59	0.16
Family Distribution by Income Level	154,158	19.80	17.73	23.45	39.02	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	57,858	4.98	23.52	57.22	13.90	0.38
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		81,321 81,300 11%	Median Housing Value Unemployment Rate (2015 ACS US Census)		225,082 2.88%	

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

ABNA's AA consists of four counties in the Madison, WI MSA: Columbia, Dane, Iowa, and Green. Green County was added to the MSA in 2015, previously part of the bank's non-MSA footprint. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. The 2010 U.S. Census recorded 133 census tracts in the AA, of which 8 (6.02 percent) were low-income tracts, 22 (16.54 percent) moderate-income tracts, 73 (54.89 percent) middle-income tracts, 27 (20.30 percent) upper-income tracts, and 3 (2.26 percent) were not applicable.

According to the 2010 U.S. census data, the area population was 605,435 with 31,168 (5.15 percent) residing in low-income census tracts, and 92,995 (15.36 percent) residing in moderate-income census tracts.

According to the 2015 U.S. ACS, the total number of census tracts remains at 133, but the census tracts have shifted. The 2015 ACS US Census recorded 133 census tracts in the AA, of which 4 (3.01 percent) were low-income tracts, 27 (20.30 percent) moderate-income tracts, 67 (50.38 percent) middle-income tracts, 29 (21.80 percent) upper-income tracts, and 6 (4.51 percent) were not applicable. Population was up from the 2010 census at 627,618, with 21,241 (3.38 percent) residing in low-income census tracts and 103,180 (16.44 percent) residing in moderate-income census tracts.

According to the 2015 U.S. ACS Census data, the total population of the AA was 627,618. The median income for a household in the MSA was \$63,933, and for a family was \$83,096. According to the BLS, the unemployment rate for this area as of December 2015 and December 2017 was 2.90 percent and 2.00 percent, respectively.

The distribution of families by income level was 2.27 percent low-income, 15.12 percent moderate-income, 57.95 percent middle-income, 24.48 percent upper-income, and 0.19 percent NA. The percentage of households in the AA living below the poverty level was 6.39 percent. The 2017 FFIEC adjusted median family income for the AA was \$81,300. Low-income families earned annual income of \$40,650 or less, and moderate-income families earned annual income of \$40,651 to \$65,040.

As of June 30, 2017, there were 51 total depository institutions in the AA operating 232 branches. ABNA has 23 branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled 2.57 billion, representing 12.92 percent of the market. ABNA is ranked second in the AA. The five top banks by deposit market share are BMO Harris Bank National Association (14.78 percent), Associated Bank, National Association (12.92 percent), U.S. Bank National Association (9.22 percent), First Business Bank (5.58 percent), and John Deere Financial FSB (5.33 percent). These institutions accounted for a combined 47.83 percent of deposit market share in the AA.

Columbia County, Wisconsin

Columbia County has a population of 56,833 as of the 2010 census. There are two area hospitals, two local airports, five county parks, ten community libraries, and 22,055 acres of state-owned wildlife areas. Top private-sector employers in Columbia County include Associated Milk Producers, Robbins Manufacturing Inc., Del Monte, and Penda Corporation.

Dane County, Wisconsin

Dane County has a population of 488,073 as of the 2010 census. The largest city, the City of Madison, is home to the State Capitol, a performing arts center, and the University of Wisconsin

– Madison, a primary economic driver for the region. Top private-sector employers include Epic Systems Corp, American Family Insurance, Covance Laboratories, CUNA Mutual, and Sub-Zero Inc.

Iowa County, Wisconsin

Iowa County has a population of 23,687 as of the 2010 census. Iowa County hosts the headquarters of Lands' End and many manufacturing employers. Top private-sector employers include Lands' End, Cummins Emissions Solutions, Inc., American Players Theatre, and Hodan Center Inc.

Green County, Wisconsin

Green County has a population of 36,842 as of the 2010 census. Green County is in southwestern Wisconsin on the Wisconsin-Illinois border. Agriculture is a major industry in the county, with key products including milk, cheese, corn, soybeans, and livestock products. Top private-sector employers include Colony Brands Inc., Kuhn North America Inc., Grande Cheese Co, and Jack Links Beef Jerky.

Employment and Economic Factors

According to the BLS report, the unemployment rate for the state of Wisconsin as of December 2015 and December 2017 was 4.30 percent and 3.20 percent, respectively. The national unemployment rate as of the same dates was 5.00 percent (December 2015) and 4.10 percent (December 2017).

According to Moody's Analytics, Madison's near-term outlook is bright despite greater difficulties filling positions as the labor market tightens. UW-Madison will anchor the economy, and expansion in tech and healthcare-related fields will help Madison retain its skilled youth and grow its workforce at a healthy clip. Madison will outpace the Midwest and U.S. in job growth through the decade's end. The top five employment sectors in the Madison MSA are Government, Professional and Business Services, Education and Health Services, Retail Trade, and Leisure and Hospitality Services. The top five employers in the Madison MSA are the University of Wisconsin – Madison, Epic Systems, UW Hospital and Clinics Authority, SSM Health, and American Family Insurance Co.

Housing

The 2010 U.S. Census reported total housing units of 265,410 for the Madison MSA. Of the total number of housing units, 158,054 or 59.55 percent of the total housing units in the AA were owner occupied, 85,520 or 32.22 percent were renter occupied, and 21,836 or 8.23 percent were vacant. Of all owner occupied units, 2,064 or 1.31 percent were located in low-income census tracts, and 21,156 or 13.39 percent were located in moderate-income census tracts. Of all occupied rental units, 8,781 or 10.27 percent were located in low-income census tracts, and 18,248 or 21.34 percent were located in moderate-income census tracts. Of all vacant units, 2,236 or 10.24 percent were located in low-income census tracts, and 3,987 or 18.26 percent were located in moderate-income census tracts. Additionally, 3,601 or 1.83 percent of all single family (1-4 units) homes and 8,900 or 13.91 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 29,395 or 14.93 percent of all single family homes and 12,474 or 19.49 percent of multifamily housing units were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$221,114, and the weighted average monthly gross rent was \$821.

The 2015 ACS U.S. Census reported total housing units of 273,289 for the Madison MSA. Of the total number of housing units, 157,819 or 57.75 percent of the total housing units in the AA

were owner occupied, 100,418 or 36.74 percent were renter occupied, and 15,052 or 5.51 percent were vacant. Of all owner occupied units, 1,011 or 0.64 percent were located in low-income census tracts, and 21,675 or 13.73 percent were located in moderate-income census tracts. Of all occupied rental units, 6,648 or 6.62 percent were located in low-income census tracts, and 23,303 or 23.21 percent were located in moderate-income census tracts. Of all vacant units, 302 or 2.01 percent were located in low-income census tracts, and 3,580 or 23.78 percent were located in moderate-income census tracts. Additionally, 3,349 or 1.66 percent of all single family (1-4 units) homes and 4,581 or 6.79 percent of multifamily (5 plus units) housing units were located in low income census tracts, and 31,872 or 15.80 percent of all single-family homes and 15,036 or 22.30 percent of multifamily housing units were located in moderate-income census tracts. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$225,082, and the weighted average monthly gross rent was \$917.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$40,650 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$189,262 mortgage with a payment of \$1,016 per month. A moderate-income borrower making \$65,040 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$302,894 mortgage with a payment of \$1,626 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,417. Moderate-income borrowers would be able to qualify for a mortgage loan in the AA. The median list price in the AA is \$260,000 and \$264,000 in 2016 and 2017, reflecting a percent change of 1.54 percent.

Community Contact

Through our community contact program, we identified banking needs of the Madison MSA. Our contact included a local Economic Development Agency, indicated the community needs include effective investments in start-up businesses, SBA financing, and funding for women and minority owned businesses. Overall, there are sufficient opportunities within the AA for financial institutions to participate in Community Development activities.

Milwaukee MSA

Demographic Information for Full Scope Area: Milwaukee MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	429	20.05	17.95	35.20	26.57	0.23
Population by Geography	1,555,908	14.65	16.20	36.13	33.02	0.00
Owner-Occupied Housing by Geography	386,906	6.74	12.89	39.84	40.52	0.00
Business by Geography	76,402	8.74	13.50	38.62	39.09	0.04
Farms by Geography	1,761	3.46	6.93	43.16	46.45	0.00
Family Distribution by Income Level	389,825	22.15	16.90	20.61	40.35	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	152,194	25.76	23.63	33.19	17.42	0.00

Median Family Income	68,787	Median Housing Value	203,186
FFIEC Adjusted Median Family Income for 2016	70,200	Unemployment Rate (2010 US	3.98%
Households Below Poverty Level	12%	Census)	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

Milwaukee MSA

Demographic Information for Full Scope Area: Milwaukee MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	431	22.97	15.78	32.25	28.31	0.70
Population by Geography	1,570,006	16.71	14.85	33.73	34.70	0.00
Owner-Occupied Housing by Geography	376,569	7.32	11.91	36.25	44.52	0.00
Business by Geography	80,452	11.04	11.89	35.64	41.39	0.04
Farms by Geography	1,823	5.21	7.24	37.85	49.70	0.00
Family Distribution by Income Level	388,209	23.46	16.18	19.42	40.94	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	153,891	29.15	20.72	30.76	19.37	0.00
Median Family Income	71,764	Median Housing Value		186,990		
FFIEC Adjusted Median Family Income for 2017	72,400	Unemployment Rate (2015 ACS US		3.85%		
Households Below Poverty Level	14%	Census)				

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

ABNA'S AA within the Milwaukee MSA consists of the following counties: Milwaukee, Ozaukee, Washington, and Waukesha counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. The 2010 U.S. Census recorded 429 census tracts in the AA, of which 86 (20.05 percent) were low-income tracts, 77 (17.95 percent) moderate-income tracts, 151 (35.20 percent) middle-income tracts, 114 (26.57 percent) upper-income tracts, and 1 (0.23 percent) not applicable.

According to the 2010 U.S. census data, the area population was 1,555,908 with 227,962 or 14.65 percent residing in low-income census tracts, and 252,057 or 16.20 percent, residing in moderate-income census tracts.

According to the 2015 U.S. ACS, the total number of census tracts increased by two, and the number of census tracts in each category has changed. The 2015 A.C.S. U.S. Census recorded 431 census tracts in the AA, of which 99 (22.97 percent) were low-income tracts, 68 (15.78 percent) moderate-income tracts, 139 (32.25 percent) middle-income tracts, 122 (28.31 percent) upper-income tracts, and 3 (0.70 percent) not applicable. Population was up from the 2010 U.S.S Census at 1,570,006, with 262,370 or 16.71 percent residing in low-income census tracts, and 233,146 or 14.85 percent, residing in moderate-income census tracts.

According to 2015 ACS U.S. Census data, the total population of the AA was 1,570,006. The median income for a household in the MSA was \$59,315, and for a family was \$75,386. According to the BLS, the unemployment rate for this area as of December 2015, December 2016, and December 2017 was 4.20 percent, 3.50 percent, and 2.80 percent, respectively.

The distribution of families by income level was 14.30 percent low-income, 13.63 percent moderate-income, 33.94 percent middle-income, and 38.13 percent upper-income. The percentage of households in the AA living below the poverty level was 12.19 percent. The 2017 FFIEC adjusted median family income for the AA was \$72,400. Low-income families earned annual income of \$36,200 or less, and moderate-income families earned annual income of \$36,201 to \$57,920.

As of June 30, 2017, there were 47 total depository institutions in the AA operating 511 branches. ABNA has 43 branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled \$5.28 billion, representing 7.47 percent of the market. ABNA is ranked fourth in the AA. The three depository institutions with market share more than ABNA in the AA are U.S. Bank National Association (43.11 percent), BMO Harris Bank National Association (13.36 percent), and JPMorgan Chase Bank, National Association (8.92 percent). The two depository institutions with market share less than ABNA in the AA are Wells Fargo Bank, National Association (2.96 percent) and PNC Bank, National Association (2.73 percent). These five institutions accounted for a combined 71.08 percent of total deposits.

Milwaukee County, Wisconsin

Milwaukee County has a population of 947,735 as of the 2010 census. Milwaukee's largest employers include Aurora Health Care, Ascension Wisconsin, Froedtert Health and Medical College of Wisconsin, Kohl's Department Stores, and Quad/Graphics. Milwaukee County is home to a number of colleges and universities including Marquette University, University of Wisconsin – Milwaukee, Milwaukee Area Technical College, Milwaukee School of Engineering, and Alverno College.

Ozaukee County, Wisconsin

Ozaukee County has a population of 86,395 as of the 2010 census. Top private-sector employers include Columbia-St. Mary's, Rockwell Automation, Concordia University, Charter Mfg. Co Inc., and Legett and Platt Inc.

Washington County, Wisconsin

Washington County has a population of 131,887 as of the 2010 census. Washington County has well-known major manufacturing industries including machine tooling, metal fabrication, printing, pharmaceutical distribution, photo finishing, and trucking. Top private-sector employers include Quad/Graphics Inc., MGS Manufacturing Group, West Bend Mutual Insurance Co, Broan-Nu Tone LLC, and Signicast.

Waukesha County, Wisconsin

Waukesha County has a population of 389,891 as of the 2010 census. Top private-sector employers include Kohl's Corp, Quad/Graphics Inc., ProHealth Care, GE Healthcare, and Target Corporation.

Employment and Economic Factors

According to the BLS report, the unemployment rate for the state of Wisconsin as of December 2015 and December 2017 was 4.30 percent and 3.20 percent, respectively. The national unemployment rate as of the same dates was 5.00 percent (December 2015) and 4.10 percent (December 2017).

According to Moody's Analytics, Milwaukee-Waukesha-West Allis will outperform the Midwest and the U.S. in job creation in 2018, supported by gains in durable goods manufacturing and financial services. Longer term, Milwaukee will be a below-average performer. Support will

lessen as more production is automated, and weak demographic trends will create hurdles for consumer industries.

Housing

The 2010 U.S. Census reported total housing units of 664,653 for the Milwaukee MSA. Of the total number of housing units in the AA, 386,906 or 58.21 percent were owner occupied, 228,941 or 34.45 percent were renter occupied, and 48,806 or 7.34 percent were vacant. Of all owner occupied units, 26,093 or 6.74 percent were located in low-income census tracts, and 49,876 or 12.89 percent were located in moderate-income census tracts. Of all occupied rental units, 53,445 or 23.34 percent were located in low-income census tracts, and 48,802 or 21.32 percent were located in moderate-income census tracts. Of all vacant units, 14,287 or 29.27 percent were located in low-income census tracts, and 9,717 or 19.91 percent were located in moderate-income census tracts. Additionally, 71,803 or 13.84 percent of all single family (1-4 units) homes and 21,738 or 15.39 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 85,204 or 16.42 percent of all single-family homes and 22,474 or 15.91 percent of multifamily housing units were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$203,186, and the weighted average monthly gross rent was \$779.

The 2015 ACS U.S. Census reported total housing units of 671,468 for the Milwaukee MSA. Of the total number of housing units in the AA, 376,569 or 56.08 percent were owner occupied, 247,577 or 36.87 percent were renter occupied, and 47,322 or 7.05 percent were vacant. Of all owner-occupied units, 27,582 or 7.32 percent were located in low-income census tracts, and 44,855 or 11.91 percent were located in moderate-income census tracts. Of all occupied rental units, 63,396 or 25.61 percent were located in low-income census tracts, and 49,497 or 19.99 percent were located in moderate-income census tracts. Of all vacant units, 16,976 or 35.87 percent were located in low-income census tracts, and 7,241 or 15.30 percent were located in moderate-income census tracts. Additionally, 81,750 or 15.64 percent of all single family (1-4 units) homes and 25,852 or 17.84 percent of multifamily (5 plus units) housing units were located in low-income census tracts, and 79,204 or 15.15 percent of all single-family homes and 21,885 or 15.10 percent of multifamily housing units were located in moderate-income census tracts. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$186,990, and the weighted average monthly gross rent was \$841.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,200 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$168,585 mortgage with a payment of \$905 per month. A moderate-income borrower making \$57,920 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$269,736 mortgage with a payment of \$1,448 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,100. Moderate-income borrowers would be able to qualify for a mortgage loan in the AA. The median list price in the AA is \$220,000 and \$205,000 in 2016 and 2017 reflecting a percent change of negative 6.82 percent.

Community Contact

Through our community contact program, we identified banking needs of the Milwaukee MSA. Our contact included a local social agency, which indicated some of the community needs for this area are credit builder loan products, financial education for high schools, financing for start-

up businesses, and lower cost alternative loan products. Overall, there are sufficient opportunities within the AA for financial institutions to participate in community development activities.

WI non-MSA

Demographic Information for Full Scope Area: WI non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	256	0.00	10.94	72.27	16.80	0.00
Population by Geography	994,833	0.00	8.80	72.15	19.04	0.00
Owner-Occupied Housing by Geography	309,584	0.00	8.85	71.63	19.52	0.00
Business by Geography	54,094	0.00	10.04	72.73	17.23	0.00
Farms by Geography	5,708	0.00	5.75	76.05	18.20	0.00
Family Distribution by Income Level	276,111	17.14	18.46	23.82	40.58	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	98,290	0.00	13.93	73.12	12.95	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		57,005 60,200 11%	Median Housing Value Unemployment Rate (2010 US Census)		154,280 3.52%	

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

Source: 2010 US Census and 2016 FFIEC updated MFI

WI non-MSA

Demographic Information for Full Scope Area: WI non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	261	0.00	10.73	74.71	12.26	2.30
Population by Geography	992,816	0.00	9.35	76.33	13.96	0.37
Owner-Occupied Housing by Geography	300,078	0.00	8.87	76.16	14.95	0.02
Business by Geography	54,684	0.00	10.53	77.06	12.29	0.12
Farms by Geography	5,364	0.00	4.06	81.75	14.19	0.00
Family Distribution by Income Level	264,834	17.30	19.23	23.22	40.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	96,756	0.00	13.40	76.84	9.61	0.14
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		60,911 62,600 12%	Median Housing Value Unemployment Rate (2015 ACS US Census)		154,466 3.25%	

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

Source: 2015 ACS US Census and 2017 FFIEC updated MFI

The ABNA AA of WI non-MSA consists of 24 counties: Ashland, Clark, Crawford, Dodge, Door, Forest, Iron, Jefferson, Lincoln, Manitowoc, Marinette, Oneida, Portage, Price, Richland, Sauk, Sawyer, Shawano, Taylor, Vernon, Vilas, Walworth, Waupaca, and Wood counties. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The AA is composed of 256 census tracts, of which zero were low-income, 28 (10.94 percent) moderate-income, 185 (72.27 percent) middle-income, and 43 (16.8 percent) upper-income. According to the 2010 U.S. Census data, the area population was 994,833 with 87,545 (8.8 percent) residing in moderate-income census tracts.

According to the 2015 ACS, the total number of census tracts has increased to 261. The increase in the number of census tracts did not affect the number of low- or moderate-income census tracts in the AA, however, have been added to the NA category of geographies that have not been assigned an income classification. NA increased from zero to six. There was also a shift between the middle- and upper-income census tracts. The middle-income census tract increased from 185 to 195 and the upper-income census tract decreased from 43 to 32. There were zero low income, 28 (10.73 percent) moderate income, 195 (74.71 percent) middle income, and 32 (12.26 percent) upper income census tracts. Population was slightly down from the 2010 census at 994,833 when compared to the 2015 ACS at 992,816, with zero residing in low-income census tracts, and 92,828 (9.35 percent) residing in moderate-income census tracts. This reflects a population change of -0.2 percent.

As of June 30, 2017, there were 107 total depository institutions in the AA operating 410 branches. ABNA has 39 branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled \$1.87 billion, representing 10.12 percent of the market. ABNA's rank is second in the AA. As of June 30, 2017, there were 107 total depository institutions in the AA operating 410 branches. ABNA has 39 branches in the AA. According to the June 30, 2017 FDIC summary of deposits report, ABNA's deposits in the AA totaled \$1.87 billion, representing 10.12 percent of the market. ABNA's rank is second in the AA. The five top banks by deposit market share are BMO Harris Bank, National Association (10.70 percent), Associated Bank, National Association (10.12 percent), Investors Community Bank (4.61 percent), Nicolet National Bank (4 percent), and Bank First National (2.87 percent). These institutions accounted for a combined 32.30 percent of deposit market share in the AA.

Ashland County, Wisconsin

Ashland County has a total population of 16,157 as of the 2010 U.S. census. The largest employers are Bad River Band of the Superior Tribe, C G Bretting Mfg. Co Inc., Memorial Medical Center Inc., Walmart, and Northland College.

Clark County, Wisconsin

Clark County has a total population of 34,690 as of the 2010 U.S. Census. Manufacturing, agriculture and construction are among the county's leading industries. Top private sector employers include Grassland Dairy Products, Inc., Abbyland Pork Pack, Inc., Cummins Filtration, Memorial Hospital, and Meyer Manufacturing.

Crawford County, Wisconsin

Crawford County has a total population of 16,644 as of the 2010 U.S. Census. The largest occupation group in Crawford County is Production, Transportation & Material Moving with

manufacturing being the major employment sector. Cabela's distribution center and retail store is the largest employer in the county, followed by 3M Manufacturing.

Dodge County, Wisconsin

Dodge County has a total population of 88,759 as of the 2010 U.S. Census. Dodge County is a leader in the production of cheese, barley, alfalfa, hay and peas for canning. Major employers include Quad/Graphics, Wisconsin Department of Corrections, Wal-Mart, John Deere Horicon Works, and Beaver Dam Community Hospital.

Door County, Wisconsin

Door County has a total population of 27,785 as of the 2010 U.S. Census. The largest employers in Door County are Bay Shipbuilding, Door County Medical Center, Hatco Corporation, County of Door, and Therma-Tron-X.

Forest County, Wisconsin

Forest County has a total population of 9,304 as of the 2010 U.S. Census. The largest employers include Forest County Potawatomi Community, Sokaogon Chippewa Community, Crandon School District, Forest County, and Wabeno School District.

Iron County, Wisconsin

Iron County has a total population of 5,916 as of the 2010 U.S. Census, making it the third-least populous county in Wisconsin.

Jefferson County, Wisconsin

Jefferson County has a total population of 83,686 as of the 2010 U.S. Census. Top private-sector employers in Jefferson County include Trek Bicycle, Nasco International, Spacesaver Corp, and Generac Power Systems, Inc.

Lincoln County, Wisconsin

Lincoln County has a total population of 28,743 as of the 2010 U.S. Census. Major employers include Church Mutual Insurance Company, Packaging Corporation of America, Harley Davidson Motor Company, and Semco Windows and Doors.

Manitowoc County, Wisconsin

Manitowoc County has a total population of 81,442 as of the 2010 U.S. Census. Its county seat was Manitowoc.

Marinette County, Wisconsin

Marinette County has a total population of 41,749 as of the 2010 U.S. Census. Its county seat was Marinette.

Oneida County, Wisconsin

Oneida County has a total population of 35,998 as of the 2010 U.S. Census. Its county seat was Rhinelander.

Portage County, Wisconsin

Portage County has a total population of 70,019 as of the 2010 U.S. Census. Its county seat was Stevens Point.

Price County, Wisconsin

Price County has a total population of 14,159 as of the 2010 U.S. Census. Its county seat was Phillips.

Richland County, Wisconsin

Richland County has a total population of 18,021 as of the 2010 U.S. census. Its county seat was Richland Center.

Sauk County, Wisconsin

Sauk County has a total population of 61,976 as of the 2010 U.S. Census. Its county seat was Baraboo.

Sawyer County, Wisconsin

Sawyer County has a total population of 16,557 as of the 2010 U.S. Census. Its county seat was Hayward.

Shawano County, Wisconsin

Shawano County has a total population of 41,949 as of the 2010 U.S. Census. Its county seat was Shawano.

Taylor County, Wisconsin

Taylor County has a total population of 20,689 as of the 2010 U.S. Census. Its county seat was Medford.

Vernon County, Wisconsin

Vernon County has a total population of 29,773 as of the 2010 U.S. Census. Its county seat was Viroqua.

Vilas County, Wisconsin

Vilas County has a total population of 21,430 as of the 2010 U.S. Census. Its county seat was Eagle River. The largest employers include Ace Hardware, Eagle River Memorial Hospital, Lake of the Torches, Local Net, and Pukall Lumber Co Inc.

Walworth County, Wisconsin

Walworth County has a total population of 102,228 as of the 2010 U.S. census. Its county seat was Elkhorn. The largest private-sector employers include Grand Geneva Resort and Spa, Wal-Mart, Miniature Precision Components Inc., Pentair Water, and Aurora Health Care.

Waupaca County, Wisconsin

Manitowoc County has a total population of 52,410 as of the 2010 U.S. Census. Its county seat was Waupaca. The largest employers are ThyssenKrupp Waupaca Gray, WI Veteran's Home, Waupaca County, Waupaca School District, and Riverside Medical Center.

Wood County, Wisconsin

Wood County has a total population of 74,749 as of the 2010 U.S. Census. Its county seat was Wisconsin Rapids. The largest employers are Marshfield Clinic, Saint Joseph's Hospital of Marshfield, Roehl Transport Inc., NewPage Corporation, and Wisconsin Rapids Public Schools.

Employment and Economic Factors

According to the BLS, the unemployment rate for this area as of December 2015 and 2017 was 4.3 percent and 3.2 percent, respectively. The national unemployment rate as of the same dates was five (December 2015) and 4.1 percent (December 2017).

According to the Moody's Analytics, job growth in Wisconsin in 2018 will be about twice that in 2017, and the 2019 outlook has been upgraded since the last update. Outsize factory gains help Wisconsin outpace the Midwest and catch up to the U.S., but business/professional services hold the most promise in coming years. The top five employment sectors in Wisconsin are Manufacturing, Education and Health Services, Government, Professional and Business Services, and Retail. The top five employers are Aurora Health Care Inc., Ascension Wisconsin, Froedert Health, Epic Systems, and Kroeger Co. Roundy's.

Housing

According to the 2010 U.S. Census, 309,584 or 58.72 percent of the total housing units in the AA were owner occupied, 103,883 or 19.71 percent were renter occupied, and 113,713 or 21.57 percent were vacant units. Of all owner occupied units, zero was located in low-income census tracts, and 27,394 or 8.85 percent were located in moderate-income census tracts. Of all occupied rental units, zero was located in low-income census tracts, and 13,078 or 12.59 percent were located in moderate-income census tracts. Of all vacant units, zero was located in low-income census tracts, and 23,140 or 20.35 percent were located in moderate-income census tracts. Additionally, zero of the single family (1-4 units) homes and multifamily (5 plus units) housing units were located in low-income census tracts, and 52,377 or 11.75 percent of all single family homes and 4,907 or 10.81 percent of multifamily housing units were located in moderate-income census. The 2010 U.S. Census indicates that the weighted average median housing value was \$154,280, and the weighted average monthly gross rent was \$630.

According to the 2015 ACS U.S. Census, 300,078 or 55.78 percent of the total housing units in the AA were owner occupied, 106,911 or 19.87 percent were renter occupied, and 130,939 or 24.34 percent were vacant units. Of all owner occupied units, zero was located in low-income census tracts, and 26,618 or 8.87 percent were located in moderate-income census tracts. Of all occupied rental units, zero was located in low-income census tracts, and 14,686 or 13.74 percent were located in moderate-income census tracts. Of all vacant units, zero was located in low-income census tracts, and 22,201 or 16.96 percent were located in moderate-income census tracts. Additionally, zero of the single family (1-4 units) homes and multifamily (5 plus units) housing units were located in low-income census tracts, and 52,379 or 11.47 percent of all single family homes and 6,181 or 12.7 percent of multifamily housing units were located in moderate-income census. The 2015 ACS U.S. Census indicates that the weighted average median housing value was \$154,466, and the weighted average monthly gross rent was \$684.

Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$31,300 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$145,859 mortgage with a payment of \$783 per month. A moderate-income borrower making \$50,080 per year (or less than 80 percent of the 2016 FFIEC adjusted median family income in the AA) could afford a \$233,225 mortgage with a payment of \$1252 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$829; however, moderate-income borrowers would be able to qualify. The median housing value in the AA is \$154,280

and \$154,466 in 2016 and 2017 reflecting a percent change of 0.12 percent from 2016 to 2017 according to the 2010 U.S. Census and the 2015 ACS U.S. Census.

Community Contact

Through our community contact program, we contacted a representative from a community action coalition who identified credit needs in Wisconsin. The community contact indicated the needs are financial literacy, banking products and services geared to LMI individuals to help build or rebuild credit. The contact also believes that the lack of financial knowledge, LMI individuals cannot qualify for homes due to bad credit.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 7. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

Table 10. Borrower Distribution of Refinance Loans - See Table 8.

Table 11. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As 12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

The tables for the following rating areas cover the bank's performance January 1, 2015 through December 31, 2017.

Chicago MMSA

Minneapolis MMSA

State of Illinois

State of Minnesota

State of Wisconsin

Table 1. Lending Volume

LENDING VOLUME													Geography: Chicago MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***												
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)													
Full Review:																								
Chicago MMSA	100.00	5,266	2,511,338	225	71,688	0	0	8	47,153	5,499	\$ 2,630.179	100.00												

* Loan Data as of December 31, 2016 Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans (CDL) is from July 28, 2015 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME													Geography: Chicago MMSA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***												
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)													
Full Review:																								
Chicago MMSA	87.69	3,125	1,325,171	124	36,916	0	0	1	16,497	3,250	1,378,584	87.69												

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans (CDLs) from July 28, 2015 to December 31, 2017

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: Chicago MMSA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Chicago MMSA	2,874	100.00	4.15	3.76	18.64	13.22	38.72	25.78	38.49	57.24	2.97	15.41	39.01	42.61							

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: Chicago MMSA		Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Chicago MMSA	2,293	90.06	4.81	5.49	19.22	23.51	34.87	23.07	41.10	47.93	3.64	16.55	35.44	44.37							

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: Chicago MMSA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*											
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp								
Full Review:																						
Chicago MMSA	412	100.00	4.15	0.49	18.64	6.80	38.72	23.30	38.49	69.42	3.31	14.87	35.64	46.18								

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: Chicago MMSA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA	217	92.74	4.81	0.00	19.22	4.61	34.87	17.51	41.10	77.88	4.99	17.98	34.70	42.33

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: Chicago MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*											
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp								
Full Review:																						
Chicago MMSA	1,965	100.00	4.15	2.14	18.64	7.89	38.72	21.83	38.49	68.14	2.31	11.13	34.16	52.40								

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: Chicago MMSA		Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Chicago MMSA	602	80.27	4.81	0.83	19.22	10.30	34.87	21.10	41.10	67.77	3.28	15.48	33.86	47.38							

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: Chicago MMSA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*										
	#	% of Total**	% of Business es***	% BANK Loans	% of Businesses** *	% BANK Loans	% of Business es***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Chicago MMSA	225	100.00	4.62	1.33	15.84	12.89	33.52	29.78	45.90	56.00	3.51	15.13	34.47	46.90							

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														
Geography: Chicago MMSA							Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Business es***	% BANK Loans	% of Businesses** *	% BANK Loans	% of Business es***	% BANK Loans	% of Businesses ***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA	124	77.50	4.96	2.42	16.48	12.90	30.37	40.32	47.66	44.35	3.51	15.13	34.47	46.90

* Based on 2017 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Chicago MMSA					Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁶	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA	2,874	100.00	23.05	6.42	17.10	14.59	19.53	9.29	40.32	69.71	7.93	20.79	25.08	46.19

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Chicago MMSA					Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁷	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA	2,299	90.09	24.22	7.87	16.55	17.63	18.41	11.85	40.82	62.64	7.60	21.61	24.71	46.08

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

⁷ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT				Geography: Chicago MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁸	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA	412	100.00	23.05	1.46	17.10	3.66	19.53	5.12	40.32	89.76	6.36	12.90	22.96	57.77

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Chicago MMSA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ⁹	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA	220	92.83	24.22	1.37	16.55	2.28	18.41	3.65	40.82	92.69	7.95	16.74	24.52	50.79

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: Chicago MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *											
	#	% of Total**	% Families*	% BANK Loans****	% Families10	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp								
Full Review:																						
Chicago MMSA	1,965	100.00	23.05	2.49	17.10	8.06	19.53	8.37	40.32	81.08	4.65	11.26	21.08	63.01								

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by BANK.

10 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: Chicago MMSA			Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*										
	#	% of Total**	% Families*	% BANK Loans****	% Families 11	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp							
Full Review:																					
Chicago MMSA	602	80.16	24.22	3.54	16.55	8.25	18.41	9.76	40.82	78.45	6.85	16.00	23.61	53.54							

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by BANK.

¹¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Chicago MMSA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MMSA	225	100.00	80.59	28.44	31.11	23.56	45.33	206,943	81,889

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.84% of small loans to businesses originated and purchased by the bank.

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Chicago MMSA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MMSA	124	77.50	80.63	37.10	33.87	23.39	42.74	206,943	81,889

* Based on 2017 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.84% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Chicago MMSA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago MMSA	59	210,228	163	141,809	222	352,037	100.00	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		Geography: CHICAGO MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017			
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population											
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography											
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp								
Full Review:																									
Chicago MMSA	100.00	25	100.00	0.00	32.00	36.00	32.00	2	3	0	+2	-2	-1	9.39	24.33	34.70	31.53								

Table 1. Lending Volume

LENDING VOLUME		Geography: MINNEAPOLIS MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Minneapolis MMSA	100.00	2,511	744,361	450	114,703	1	10	1	6,550	2,563	865,624	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans (CDLs) is from July 28, 2015 to December 31, 2016

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		Geography: MINNEAPOLIS MMSA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Minneapolis MMSA	91.38	1,125	362,566	210	54,808	0	0	1	13,500	1,336	430,874	91.38

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans (CDLs) is from July 28, 2015 to December 31, 2017

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														
Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	1,298	100.00	2.79	5.01	13.46	11.79	49.42	46.76	34.33	36.44	3.26	14.13	49.28	33.32

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														
Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	755	89.88	2.47	4.11	16.96	14.30	48.45	48.74	32.12	32.85	3.83	18.25	48.91	29.01

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: MINNEAPOLIS MMSA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Minneapolis MMSA	156	100.00	2.79	3.21	13.46	5.13	49.42	50.00	34.33	41.67	2.53	11.55	49.46	36.46							

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: MINNEAPOLIS MMSA		Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Minneapolis MMSA	58	96.67	2.47	1.72	16.96	15.52	48.45	44.83	32.12	37.93	2.63	16.60	48.82	31.95							

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	1,053	100.00	2.79	1.42	13.46	8.93	49.42	51.00	34.33	38.65	1.82	9.99	48.25	39.95

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: MINNEAPOLIS MMSA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*											
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp								
Full Review:																						
Minneapolis MMSA	310	93.09	2.47	1.29	16.96	14.84	48.45	50.97	32.12	32.90	2.17	16.25	49.51	32.07								

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	450	100.00	5.05	5.78	15.35	21.11	44.66	44.22	34.93	28.89	3.87	13.87	42.78	39.48

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MINNEAPLOIS MMSA		Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*										
	#	% of Total**	% of Business es***	% BANK Loans	% of Businesses** *	% BANK Loans	% of Businesse s***	% BANK Loans	% of Businesses ***	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Minneapolis MMSA	210	93.33	4.98	5.71	18.20	25.71	46.13	43.33	30.34	25.24	3.87	13.87	42.78	39.48							

* Based on 2017 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MINNEAPOLIS MMSA					Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹²	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	1,298	100.00	19.30	11.94	17.46	24.59	22.86	17.91	40.38	45.56	11.46	27.26	25.82	35.46

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by BANK.

¹² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE														
Geography: MINNEAPOLIS MMSA							Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹³	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	756	89.89	20.55	15.03	17.27	26.04	21.93	16.38	40.25	42.55	11.61	28.43	25.85	34.11

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by BANK.

¹³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MINNEAPOLIS MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families*	% BANK Loans****	% Families ¹⁴	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	156	100.00	19.30	9.80	17.46	19.61	22.86	20.26	40.38	50.33	8.60	20.51	26.03	44.85

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by BANK.

¹⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: MINNEAPOLIS MMSA					Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*													
	#	% of Total**	% Families*	% BANK Loans****	% Families 15	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp										
Full Review:																								
Minneapolis MMSA	58	96.67	20.55	8.77	17.27	10.53	21.93	15.79	40.25	64.91	8.21	21.20	27.80	42.79										

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by BANK.

15 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families*	% BANK Loans****	% Families ₁₆	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	1,053	100.00	19.30	11.11	17.46	22.03	22.86	20.85	40.38	46.02	7.32	19.30	26.73	46.64

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by BANK.

16 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families*	% BANK Loans****	% Families 17	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Minneapolis MMSA	310	93.09	20.55	11.49	17.27	24.32	21.93	20.61	40.25	43.58	10.11	24.39	26.54	38.96

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by BANK.

17 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Minneapolis MMSA	450	100.00	83.63	19.78	39.56	23.33	37.11	72,127	33,638

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.94% of small loans to businesses originated and purchased by the bank.

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: MINNEAPOLIS MMSA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Minneapolis MMSA	210	93.33	83.86	28.10	42.86	20.00	37.14	72,127	33,638

* Based on 2017 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.94% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MINNEAPOLIS MMSA			Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Minneapolis MMSA	24	14,785	81	35,881	105	50,666	100.00	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: MINNEAPOLIS MMSA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017					
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Minneapolis MMSA	100.00	20	100.00	15.00	25.00	50.00	10.00	0	4	0	0	-3	-1	6.95	16.52	45.97	30.43

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Peoria MSA	41.12	359	62,889	23	3,064	0	0	0	0	382	65,953	3.63
St Louis MSA	22.69	197	28,236	13	939	0	0	0	0	210	29,175	6.72
Limited Review:												
Rockford MSA	36.19	306	30,774	30	5,348	0	0	1	1,790	337	37,912	11.24

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 28, 2015 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Peoria MSA	5.26	187	28,024	8	1,100	0	0	0	0	195	29,124	5.26
St Louis MSA	3.35	114	16,413	10	1,518	0	0	0	0	124	17,931	3.35
Limited Review:												
Rockford MSA	3.70	119	12,587	18	2,616	0	0	0	0	137	15,203	3.70

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 28, 2015 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	150	38.46	2.82	2.67	15.86	10.00	57.62	52.67	23.70	34.67	1.37	13.19	58.57	26.87
St Louis MSA	82	21.03	6.27	1.22	16.88	9.76	50.55	48.78	26.30	40.24	0.63	10.88	54.08	34.40
Limited Review:														
Rockford MSA	158	40.51	4.75	1.90	20.52	18.35	46.11	46.20	28.62	33.54	1.38	14.12	51.21	33.29

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017								
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	113	4.44	4.61	1.77	18.52	18.58	45.79	45.13	31.09	34.51	2.16	18.54	46.63	32.67
St Louis MSA	66	2.59	7.99	3.03	17.32	9.09	46.63	50.00	28.06	37.88	1.79	14.49	50.64	33.09
Limited Review:														
Rockford MSA	74	2.91	6.10	1.35	16.71	8.11	29.89	29.73	47.29	60.81	2.30	12.99	35.00	49.72

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	20	36.36	2.82	0.00	15.86	15.00	57.62	40.00	23.70	45.00	1.03	16.10	58.73	24.14
St Louis MSA	21	38.18	6.27	0.00	16.88	4.76	50.55	42.86	26.30	52.38	2.44	11.53	52.02	34.01
Limited Review:														
Rockford MSA	14	25.46	4.75	0.00	20.52	14.29	46.11	57.14	28.62	28.57	2.62	17.54	53.40	26.44

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	9	3.85	4.61	11.11	18.52	0.00	45.79	88.89	31.09	0.00	6.89	20.99	42.47	29.65
St Louis MSA	8	3.42	7.99	0.00	17.32	0.00	46.63	75.00	28.06	25.00	3.36	13.10	48.61	34.93
Limited Review:														
Rockford MSA	0	0.00	6.10	0.00	16.71	0.00	29.89	0.00	47.29	0.00	5.16	10.32	33.42	51.11

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: STATE OF ILLINOIS															Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*																																	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp																														
Full Review:																																												
Peoria MSA	189	45.54	2.82	0.53	15.86	15.34	57.62	51.85	23.70	32.28	0.93	10.48	58.99	29.60																														
St Louis MSA	94	22.65	6.27	4.26	16.88	10.64	50.55	39.36	26.30	45.74	0.89	8.02	51.07	40.01																														
Limited Review:																																												
Rockford MSA	132	31.81	4.75	0.00	20.52	20.45	46.11	51.52	28.62	28.03	1.96	11.97	48.04	38.03																														

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: STATE OF ILLINOIS															Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*																																	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp																														
Full Review:																																												
Peoria MSA	65	8.67	4.61	0.00	18.52	32.31	45.79	33.85	31.09	33.85	2.54	18.42	43.86	35.19																														
St Louis MSA	40	5.33	7.99	2.50	17.32	15.00	46.63	47.50	28.06	35.00	1.67	12.88	47.75	37.70																														
Limited Review:																																												
Rockford MSA	43	5.73	6.10	4.65	16.71	11.63	29.89	34.88	47.29	48.84	3.88	12.79	28.41	54.91																														

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Business***	% BANK Loans	% of Businesses** *	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	23	34.86	9.07	4.35	16.87	26.09	49.65	39.13	24.41	30.43	7.06	13.44	51.20	28.30
St Louis MSA	13	19.69	6.42	15.38	17.61	23.08	50.07	46.15	25.91	15.38	5.46	15.07	47.80	31.67
Limited Review:														
Rockford MSA	30	45.45	7.38	10.00	21.48	23.33	43.89	46.67	26.70	20.00	7.13	19.92	44.26	28.68

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Business es***	% BANK Loans	% of Businesses** *	% BANK Loans	% of Business es***	% BANK Loans	% of Businesses ***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	8	5.00	13.13	25.00	16.96	25.00	41.33	25.00	28.58	25.00	7.06	13.44	51.20	28.30
St Louis MSA	10	6.25	9.19	10.00	19.82	30.00	45.45	40.00	25.54	20.00	5.46	15.07	47.80	31.67
Limited Review:														
Rockford MSA	18	11.25	10.69	27.78	16.09	33.33	25.89	11.11	44.74	27.78	7.13	19.92	44.26	28.68

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF ILLINOIS					Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹⁸	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	150	38.46	20.37	16.33	18.69	21.09	22.09	24.49	38.85	38.10	14.02	25.45	25.73	34.80
St Louis MSA	82	21.03	23.48	16.05	17.28	17.28	21.69	27.16	37.55	39.51	11.12	24.16	26.60	38.12
Limited Review:														
Rockford MSA	158	40.51	22.55	15.48	18.05	28.39	21.56	21.94	37.84	34.19	7.43	26.42	28.02	38.14

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

¹⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹⁹	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	113	4.43	21.57	16.67	17.60	28.70	21.13	16.67	39.69	37.96	16.71	26.28	23.45	33.56
St Louis MSA	66	2.59	23.72	12.31	17.53	23.08	20.00	23.08	38.74	41.54	13.31	23.80	26.66	36.23
Limited Review:														
Rockford MSA	74	2.90	23.03	12.16	17.02	25.68	20.00	27.03	39.95	35.14	10.80	26.42	27.69	35.09

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

¹⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families*	% BANK Loans****	% Families 20	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	20	36.36	20.37	31.58	18.69	15.79	22.09	10.53	38.85	42.11	11.80	22.89	23.42	41.90
St Louis MSA	21	38.18	23.48	9.52	17.28	14.29	21.69	47.62	37.55	28.57	10.47	14.17	26.44	48.92
Limited Review:														
Rockford MSA	14	25.46	22.55	7.69	18.05	0.00	21.56	38.46	37.84	53.85	7.63	18.80	24.25	49.32

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

20 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF ILLINOIS					Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families*	% BANK Loans****	% Families ²¹	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	9	3.80	21.57	22.22	17.60	22.22	21.13	22.22	39.69	33.33	17.26	21.50	27.20	34.04
St Louis MSA	8	3.38	23.72	12.50	17.53	0.00	20.00	12.50	38.74	75.00	10.35	20.97	25.83	42.84
Limited Review:														
Rockford MSA	0	0.00	23.03	0.00	17.02	0.00	20.00	0.00	39.95	0.00	8.33	17.68	26.26	47.73

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by BANK.

²¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families*	% BANK Loans****	% Families 22	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	189	45.54	20.37	10.50	18.69	19.34	22.09	24.31	38.85	45.86	10.37	18.16	24.59	46.87
St Louis MSA	94	22.65	23.48	8.79	17.28	16.48	21.69	27.47	37.55	47.25	6.66	15.34	24.61	53.39
Limited Review:														
Rockford MSA	132	31.81	22.55	17.32	18.05	15.75	21.56	28.35	37.84	38.58	7.42	16.91	24.14	51.53

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by BANK.

22 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families*	% BANK Loans****	% Families 23	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Peoria MSA	65	8.66	21.57	15.87	17.60	14.29	21.13	30.16	39.69	39.68	13.14	22.27	25.52	39.07
St Louis MSA	40	5.33	23.72	10.26	17.53	20.51	20.00	38.46	38.74	30.77	9.82	19.66	27.18	43.35
Limited Review:														
Rockford MSA	44	5.86	23.03	16.28	17.02	20.93	20.00	34.88	39.95	27.91	8.88	18.84	27.29	44.99

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by BANK.

23 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Peoria MSA	23	34.84	75.45	47.83	65.22	17.39	17.39	4,513	1,807
St Louis MSA	13	19.69	78.53	38.46	76.92	23.08	0.00	8,224	3,811
Limited Review:									
Rockford MSA	30	45.47	78.54	43.33	63.33	20.00	16.67	3,494	1,451

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.84% of small loans to businesses originated and purchased by the bank.

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Peoria MSA	8	5.00	75.19	37.50	50.00	25.00	25.00	4,513	1,807
St Louis MSA	10	6.25	78.09	80.00	60.00	20.00	20.00	8,224	3,811
Limited Review:									
Rockford MSA	18	11.25	78.15	55.56	72.22	11.11	16.67	3,494	1,451

* Based on 2017 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 16.84% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF ILLINOIS			Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Peoria MSA	11	10,906	19	13,470	30	24,376	32.87	0	0
St Louis MSA	8	1,746	16	1,882	24	3,628	4.89	0	0
Limited Review:									
Rockford MSA	22	11,805	25	852	47	12,657	17.07	0	0
Statewide Investments	21	27,538	4	5,964	25	33,502	45.17	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017					
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Peoria MSA	16.82	6	30.00	16.66	16.67	50.00	16.67	0	0	0	0	0	0	6.09	17.27	53.39	23.25
St Louis MSA	52.04	8	40.00	12.50	12.50	37.50	37.50	0	0	0	0	0	0	8.86	18.00	48.45	24.69
Limited Review:																	
Rockford MSA	31.14	6	30.00	0.00	33.34	50.00	16.66	0	0	0	0	0	0	9.74	24.57	41.95	23.74

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF MINNESOTA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Rochester MSA	62.17	148	68,040	17	2,981	0	0	1	1,294	166	72,315	6.97
Limited Review:												
MN- Non MSA	37.83	83	15,204	18	3,016	0	0	0	0	101	18,220	4.92

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans (CDLs) is from July 28, 2015 to December 31, 2016

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME													Geography: STATE OF MINNESOTA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017					
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***										
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)											
Full Review:																						
Rochester MSA	6.43	85	22,066	9	2,175	0	0	0	0	94	24,241	6.43										
Limited Review:																						
MN- Non MSA	2.19	26	4,880	6	1,693	0	0	0	0	32	6,573	2.19										

* Loan Data as of December 31, 2017 Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans (CDLs) is from January 1, 2017 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: STATE OF MINNESOTA															Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*																																	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp																														
Full Review:																																												
Rochester MSA	86	66.15	0.00	0.00	8.04	4.65	61.03	54.65	30.93	40.70	0.00	9.21	57.85	32.94																														
Limited Review:																																												
MN- Non MSA	44	33.85	0.00	0.00	0.00	0.00	51.80	52.27	48.20	47.73	0.00	0.00	52.02	47.98																														

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														
Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	67	7.98	0.00	0.00	17.81	11.94	39.74	23.88	42.45	64.18	0.00	20.76	36.75	42.48
Limited Review:														
MN- Non MSA	18	2.14	0.00	0.00	0.00	0.00	72.94	83.33	27.06	16.67	0.00	0.00	82.01	17.99

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income *			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	3	50.00	0.00	0.00	8.04	33.33	61.03	66.67	30.93	0.00	0.00	8.21	56.26	35.52
Limited Review:														
MN- Non MSA	3	50.00	0.00	0.00	0.00	0.00	51.80	33.33	48.20	66.67	0.00	0.00	41.07	58.93

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF MINNESOTA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income *			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	2	3.33	0.00	0.00	17.81	50.00	39.74	0.00	42.45	50.00	0.00	17.38	40.93	41.68
Limited Review:														
MN- Non MSA	0	0.00	0.00	0.00	0.00	0.00	72.94	0.00	27.06	0.00	0.00	0.00	69.40	30.60

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	57	61.29	0.00	0.00	8.04	12.28	61.03	50.88	30.93	36.84	0.00	6.97	54.44	38.60
Limited Review:														
MN- Non MSA	36	38.71	0.00	0.00	0.00	0.00	51.80	36.11	48.20	63.89	0.00	0.00	41.52	58.48

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: STATE OF MINNESOTA		Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*											
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp								
Full Review:																						
Rochester MSA	15	4.50	0.00	0.00	17.81	13.33	39.74	53.33	42.45	33.33	0.00	18.39	40.28	41.33								
Limited Review:																						
MN- Non MSA	8	2.40	0.00	0.00	0.00	0.00	72.94	75.00	27.06	25.00	0.00	0.00	67.04	32.96								

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	17	48.57	0.00	0.00	8.50	17.65	61.43	70.59	30.07	11.76	0.00	7.12	59.01	33.87
Limited Review:														
MN- Non MSA	18	51.43	0.00	0.00	0.00	0.00	58.92	94.44	41.08	5.56	0.00	0.00	59.84	40.16

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	9	4.00	0.00	0.00	22.94	22.22	41.65	55.56	35.41	22.22	0.00	7.12	59.01	33.87
Limited Review:														
MN- Non MSA	6	2.67	0.00	0.00	0.00	0.00	75.30	66.67	24.70	33.33	0.00	0.00	59.84	40.16

* Based on 2017 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF MINNESOTA					Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families***	% BANK Loans****	% Families ²⁴	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	86	66.15	15.35	14.81	17.80	18.52	23.48	24.69	43.38	41.98	12.61	29.51	23.24	34.65
Limited Review:														
MN- Non MSA	44	33.85	13.56	6.98	13.77	20.93	23.04	25.58	49.62	46.51	5.11	27.49	28.83	38.56

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by BANK.

²⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF MINNESOTA					Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families***	% BANK Loans****	% Families ²⁵	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	67	7.97	17.60	7.58	17.09	19.70	22.95	19.70	42.36	53.03	13.36	29.09	22.51	35.04
Limited Review:														
MN- Non MSA	18	2.14	15.14	5.56	16.62	38.89	19.78	11.11	48.46	44.44	5.33	23.93	26.66	44.08

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by BANK.

²⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF MINNESOTA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families*	% BANK Loans****	% Families ₂₆	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	3	50.00	15.35	0.00	17.80	33.33	23.48	66.67	43.38	0.00	11.71	19.37	25.00	43.92
Limited Review:														
MN- Non MSA	3	50.00	13.56	0.00	13.77	0.00	23.04	33.33	49.62	66.67	5.66	16.04	20.75	57.55

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by BANK.

26 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF MINNESOTA				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families*	% BANK Loans****	% Families 27	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	2	3.33	17.60	50.00	17.09	50.00	22.95	0.00	42.36	0.00	9.80	20.98	22.35	46.86
Limited Review:														
MN- Non MSA	0	0.00	15.14	0.00	16.62	0.00	19.78	0.00	48.46	0.00	5.65	15.32	25.00	54.03

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by BANK.

27 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families*	% BANK Loans****	% Families 28	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	57	61.29	15.35	17.86	17.80	21.43	23.48	19.64	43.38	41.07	8.51	19.59	25.24	46.66
Limited Review:														
MN- Non MSA	36	38.71	13.56	2.78	13.77	19.44	23.04	22.22	49.62	55.56	4.59	13.95	25.51	55.95

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by BANK.

28 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families*	% BANK Loans****	% Families 29	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Rochester MSA	15	4.50	17.60	0.00	17.09	46.67	22.95	26.67	42.36	26.67	12.07	24.65	23.27	40.00
Limited Review:														
MN- Non MSA	8	2.40	15.14	25.00	16.62	12.50	19.78	25.00	48.46	37.50	5.58	16.50	28.93	48.98

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by BANK.

29 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Rochester MSA	17	48.57	82.02	29.41	64.71	23.53	11.76	2,902	1,457
Limited Review:									
MN- Non MSA	18	51.43	82.93	44.44	77.78	11.11	11.11	757	358

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.94% of small loans to businesses originated and purchased by the bank.

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Rochester MSA	9	4.00	81.76	66.67	55.56	22.22	22.22	2,902	1,457
Limited Review:									
MN- Non MSA	6	2.67	82.73	66.67	66.67	0.00	33.33	757	358

* Based on 2017 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2017).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.94% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF MINNESOTA			Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Rochester MSA	2	315	20	7,423	22	7,738	53.37	0	0
Limited Review:									
MN- Non MSA	4	311	3	382	7	693	4.78	0	0
Statewide Investments	6	3,718	2	2,349	8	6,067	41.85		

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: STATE OF MINNESOTA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017					
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Rochester MSA	58.64	4	80	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	10.77	59.77	29.46
Limited Review:																	
MN- Non MSA	41.36	1	20	0.00	0.00	100	0.00	0	0	0	0	0	0	0.00	0.00	52.50	47.50

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Green Bay MSA	13.95	2,042	338,219	245	76,449	0	0	0	0	2,287	414,668	17.26
La Crosse MSA	2.54	390	64,664	27	5,990	0	0	0	0	417	70,654	1.96
Madison MSA	9.19	1,275	266,234	232	56,539	0	0	6	47,461	1,513	370,234	17.48
Milwaukee MSA	23.63	3,298	937,997	576	161,021	0	0	8	15,882	3,882	1,114,840	35.90
WI Non-MSA	22.06	3,329	508,087	282	58,799	6	518	2	4,675	3,619	572,079	12.73
Limited Review:												
Appleton MSA	7.02	1,072	170,727	79	21,413	0	0	1	5,078	1,152	197,218	2.38
Eau Claire MSA	2.05	316	44,832	20	7,111	0	0	0	0	336	51,943	.91
Fond du Lac MSA	2.47	376	58,643	29	10,171	0	0	0	0	405	68,814	.39
Janesville MSA	3.83	596	71,398	29	5,404	3	1,500	0	0	628	78,302	3.94
Oshkosh MSA	5.56	847	128,232	65	18,343	0	0	1	4,440	913	151,015	2.88
Racine MSA	2.40	362	60,430	31	7,899	0	0	0	0	393	68,329	.96
Sheboygan MSA	2.28	342	49,800	31	9,000	0	0	0	0	373	58,800	.82
Wausau MSA	3.02	464	69,274	31	9,291	0	0	0	0	495	78,565	2.37

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans (CDLs) is from July 28, 2015 to December 31, 2016

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017						
Assessment Area (2017):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Green Bay MSA	12.37	756	135,122	120	34,489	0	0	1	200	877	169,811	12.37
La Crosse MSA	2.56	164	27,876	16	2,917	1	100	1	1,468	182	32,361	2.56
Madison MSA	8.98	531	119,253	103	19,080	2	248	1	1,680	637	140,261	8.98
Milwaukee MSA	26.46	1,567	420,407	307	78,351	0	0	6	25,706	1,880	524,464	26.46
WI Non-MSA	20.40	1,295	196,262	150	31,313	0	0	1	2,240	1,446	229,815	20.40
Limited Review:												
Appleton MSA	7.40	462	89,342	62	15,363	0	0	0	0	524	104,705	7.40
Eau Claire MSA	2.02	129	21,279	14	1,105	0	0	0	0	143	22,384	2.02
Fond du Lac MSA	2.27	152	24,057	9	2,894	0	0	1	7,398	162	34,349	2.27
Janesville MSA	4.07	276	33,929	12	1,742	0	0	0	0	288	35,671	4.07
Oshkosh MSA	5.52	370	59,018	21	3,012	0	0	0	0	391	62,030	5.52
Racine MSA	3.61	239	37,927	17	3,540	0	0	0	0	256	41,467	3.61
Sheboygan MSA	2.10	131	26,604	18	5,037	0	0	0	0	149	31,641	2.10
Wausau MSA	2.23	136	22,483	22	4,762	0	0	0	0	158	27,245	2.23

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans including multifamily loans that qualify as CD Loans from January 1, 2017 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	1,077	13.56	0.73	0.93	20.16	16.71	55.51	45.87	23.61	36.49	0.84	19.24	50.80	29.12
La Crosse MSA	195	2.46	0.66	0.00	4.94	5.64	74.53	74.36	19.87	20.00	1.25	5.68	72.47	20.60
Madison MSA	620	7.81	1.31	1.13	13.39	13.06	62.40	61.13	22.91	24.68	1.11	11.77	60.90	26.22
Milwaukee MSA	1,850	23.29	6.74	2.38	12.89	8.43	39.84	36.05	40.52	53.14	2.61	10.36	44.41	42.62
WI Non-MSA	1,553	19.55	0.00	0.00	8.85	9.85	71.63	69.16	19.52	20.99	0.00	8.51	68.33	23.17
Limited Review:														
Appleton MSA	646	8.13	0.00	0.00	6.20	4.95	75.79	68.58	18.01	26.47	0.00	5.36	72.69	21.95
Eau Claire MSA	207	2.61	0.00	0.00	11.92	8.21	73.51	77.78	14.57	14.01	0.00	9.96	76.36	13.68
Fond du Lac MSA	218	2.74	0.00	0.00	6.15	6.42	85.44	77.06	8.42	16.51	0.00	6.64	82.71	10.64
Janesville MSA	382	4.81	4.55	3.66	15.66	14.66	55.87	59.69	23.92	21.99	3.21	12.97	55.96	27.86
Oshkosh MSA	512	6.45	0.00	0.00	10.85	8.20	69.87	65.43	19.27	26.37	0.00	10.99	70.01	19.00
Racine MSA	232	2.92	2.21	0.86	10.75	8.62	54.91	55.60	32.13	34.91	0.54	8.10	56.77	34.59
Sheboygan MSA	178	2.24	0.00	0.00	18.68	11.24	73.40	82.02	7.92	6.74	0.00	17.77	73.20	9.03
Wausau MSA	272	3.42	0.00	0.00	13.86	10.66	75.82	75.74	10.32	13.60	0.00	14.41	73.13	12.45

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Purchase Loans		Low-Income Geography		Moderate-Income Geography		Middle-Income Geography		Upper-Income Geography		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total*	% Owner Occupied Units***	% BANK Loans****	% Owner Occupied Units***	% BANK Loans****	% Owner Occupied Units***	% BANK Loans****	% Owner Occupied Units***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	467	11.44	0.90	1.93	19.77	19.06	54.74	47.11	24.59	31.91	1.22	21.50	49.52	27.77
La Crosse MSA	106	2.60	0.38	0.00	7.83	7.55	68.46	66.98	23.34	25.47	0.39	8.42	69.99	21.19
Madison MSA	310	7.60	0.64	0.97	13.74	11.94	60.04	56.45	25.58	30.65	0.66	12.01	57.52	29.81
Milwaukee MSA	1,083	26.54	7.32	7.20	11.91	13.30	36.25	31.86	44.52	47.65	3.56	12.69	39.65	44.09
WI Non-MSA	737	18.06	0.00	0.00	8.87	7.33	76.17	77.20	14.95	15.47	0.00	8.53	75.43	16.05
Limited Review:														
Appleton MSA	329	8.06	0.00	0.00	9.15	7.90	81.43	79.94	9.42	12.16	0.00	8.91	81.27	9.82
Eau Claire MSA	95	2.33	0.00	0.00	11.39	11.58	77.34	75.79	11.26	12.63	0.00	12.51	76.05	11.44
Fond du Lac MSA	107	2.62	1.18	4.67	2.54	1.87	87.10	83.18	9.19	10.28	2.17	2.66	87.42	7.74
Janesville MSA	191	4.68	0.79	0.52	21.35	28.80	46.18	47.12	31.68	23.56	1.17	18.46	46.23	34.14
Oshkosh MSA	278	6.81	0.00	0.00	9.85	8.63	62.54	61.87	27.61	29.50	0.00	12.14	60.99	26.88
Racine MSA	199	4.88	2.70	2.51	16.16	23.62	57.46	51.76	23.68	22.11	0.78	16.07	60.91	22.24
Sheboygan MSA	86	2.11	0.00	0.00	7.72	6.98	76.35	76.74	15.94	16.28	0.00	8.00	75.88	16.12
Wausau MSA	93	2.28	0.86	1.08	9.05	11.83	77.99	67.74	12.10	19.35	0.63	10.85	74.04	14.48

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2015 ACS Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	101	14.11	0.73	0.99	20.16	14.85	55.51	55.45	23.61	28.71	0.72	20.17	53.75	25.36
La Crosse MSA	22	3.07	0.66	0.00	4.94	9.09	74.53	77.27	19.87	13.64	1.52	3.23	75.33	19.92
Madison MSA	65	9.08	1.31	0.00	13.39	15.38	62.40	60.00	22.91	24.62	0.76	12.32	63.59	23.33
Milwaukee MSA	133	18.58	6.74	0.75	12.89	3.76	39.84	40.60	40.52	54.89	5.48	9.41	39.72	45.40
WI Non-MSA	215	30.03	0.00	0.00	8.85	12.09	71.63	69.77	19.52	18.14	0.00	8.84	73.22	17.94
Limited Review:														
Appleton MSA	36	5.03	0.00	0.00	6.20	2.78	75.79	66.67	18.01	30.56	0.00	6.43	73.06	20.51
Eau Claire MSA	21	2.93	0.00	0.00	11.92	9.52	73.51	47.62	14.57	42.86	0.00	16.34	68.87	14.79
Fond du Lac MSA	23	3.21	0.00	0.00	6.15	4.35	85.44	86.96	8.42	8.70	0.00	8.29	81.11	10.60
Janesville MSA	23	3.21	4.55	4.35	15.66	21.74	55.87	56.52	23.92	17.39	5.11	13.14	49.27	32.48
Oshkosh MSA	30	4.19	0.00	0.00	10.85	6.67	69.87	66.67	19.27	26.67	0.00	15.44	64.88	19.69
Racine MSA	12	1.68	2.21	0.00	10.75	0.00	54.91	58.33	32.13	41.67	0.76	8.02	53.05	38.17
Sheboygan MSA	11	1.54	0.00	0.00	18.68	18.18	73.40	54.55	7.92	27.27	0.00	17.03	73.48	9.49
Wausau MSA	24	3.35	0.00	0.00	13.86	8.33	75.82	91.67	10.32	0.00	0.00	11.21	78.25	10.54

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	42	13.95	0.90	0.00	19.77	9.52	54.74	71.43	24.59	19.05	0.50	16.63	56.58	26.30
La Crosse MSA	9	2.99	0.38	0.00	7.83	0.00	68.46	88.89	23.34	11.11	0.25	6.97	73.13	19.65
Madison MSA	30	9.97	0.64	3.33	13.74	16.67	60.04	53.33	25.58	26.67	0.91	16.21	58.97	23.91
Milwaukee MSA	75	24.92	7.32	2.67	11.91	2.67	36.25	30.67	44.52	64.00	5.42	9.92	35.47	49.19
WI Non-MSA	76	25.25	0.00	0.00	8.87	11.84	76.17	68.42	14.95	19.74	0.00	7.97	76.99	15.03
Limited Review:														
Appleton MSA	19	6.31	0.00	0.00	9.15	5.26	81.43	84.21	9.42	10.53	0.00	7.32	81.80	10.88
Eau Claire MSA	9	2.99	0.00	0.00	11.39	0.00	77.34	88.89	11.26	11.11	0.00	16.87	72.84	10.29
Fond du Lac MSA	8	2.66	1.18	0.00	2.54	0.00	87.10	62.50	9.19	37.50	1.94	2.43	83.98	11.65
Janesville MSA	11	3.65	0.79	0.00	21.35	9.09	46.18	72.73	31.68	18.18	1.16	22.61	46.67	29.57
Oshkosh MSA	11	3.65	0.00	0.00	9.85	0.00	62.54	54.55	27.61	45.45	0.00	9.03	61.04	29.93
Racine MSA	4	1.33	2.70	0.00	16.16	0.00	57.46	75.00	23.68	25.00	1.16	10.47	67.05	21.32
Sheboygan MSA	4	1.33	0.00	0.00	7.72	0.00	76.35	100.00	15.94	0.00	0.00	10.08	76.66	13.26
Wausau MSA	3	1.00	0.86	0.00	9.05	0.00	77.99	100.00	12.10	0.00	2.40	5.99	79.34	12.28

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2015 ACS Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	862	14.35	0.73	0.35	20.16	12.88	55.51	45.48	23.61	41.30	0.56	16.42	48.46	34.57
La Crosse MSA	172	2.86	0.66	1.16	4.94	2.33	74.53	73.26	19.87	23.26	1.07	4.62	75.01	19.30
Madison MSA	585	9.74	1.31	0.51	13.39	9.91	62.40	63.08	22.91	26.50	0.81	9.58	61.60	28.00
Milwaukee MSA	1,295	21.56	6.74	1.39	12.89	4.79	39.84	33.82	40.52	60.00	1.86	6.88	37.73	53.53
WI Non-MSA	1,553	25.86	0.00	0.00	8.85	9.53	71.63	69.03	19.52	21.44	0.00	7.45	69.00	23.55
Limited Review:														
Appleton MSA	388	6.46	0.00	0.00	6.20	3.35	75.79	65.21	18.01	31.44	0.00	4.69	70.88	24.43
Eau Claire MSA	87	1.45	0.00	0.00	11.92	10.34	73.51	75.86	14.57	13.79	0.00	11.89	72.71	15.41
Fond du Lac MSA	133	2.21	0.00	0.00	6.15	6.77	85.44	78.20	8.42	15.04	0.00	5.63	81.85	12.53
Janesville MSA	191	3.18	4.55	3.14	15.66	16.75	55.87	54.45	23.92	25.65	2.23	9.97	57.05	30.75
Oshkosh MSA	304	5.06	0.00	0.00	10.85	9.21	69.87	60.53	19.27	30.26	0.00	9.34	67.93	22.72
Racine MSA	116	1.93	2.21	0.00	10.75	2.59	54.91	48.28	32.13	49.14	0.87	6.82	51.94	40.37
Sheboygan MSA	153	2.55	0.00	0.00	18.68	13.73	73.40	80.39	7.92	5.88	0.00	15.19	74.76	10.05
Wausau MSA	167	2.78	0.00	0.00	13.86	10.18	75.82	81.44	10.32	8.38	0.00	11.44	75.26	13.30

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	245	13.57	0.90	0.82	19.77	16.33	54.74	52.24	24.59	30.61	0.83	18.62	51.05	29.51
La Crosse MSA	49	2.71	0.38	0.00	7.83	4.08	68.46	75.51	23.34	20.41	0.75	8.79	67.82	22.64
Madison MSA	189	10.47	0.64	0.53	13.74	14.29	60.04	60.32	25.58	24.87	0.65	12.62	60.25	26.48
Milwaukee MSA	400	22.16	7.32	3.25	11.91	6.50	36.25	30.50	44.52	59.75	3.66	9.93	36.65	49.76
WI Non-MSA	482	26.70	0.00	0.00	8.87	8.71	76.17	75.73	14.95	15.56	0.00	8.81	75.68	15.51
Limited Review:														
Appleton MSA	111	6.15	0.00	0.00	9.15	10.81	81.43	77.48	9.42	11.71	0.00	8.32	81.61	10.07
Eau Claire MSA	24	1.33	0.00	0.00	11.39	16.67	77.34	70.83	11.26	12.50	0.00	12.69	76.10	11.21
Fond du Lac MSA	37	2.05	1.18	2.70	2.54	2.70	87.10	83.78	9.19	10.81	1.14	2.08	88.55	8.22
Janesville MSA	74	4.10	0.79	0.00	21.35	27.03	46.18	55.41	31.68	17.57	0.73	20.51	44.96	33.80
Oshkosh MSA	79	4.38	0.00	0.00	9.85	8.86	62.54	50.63	27.61	40.51	0.00	9.63	60.11	30.26
Racine MSA	35	1.94	2.70	0.00	16.16	8.57	57.46	60.00	23.68	31.43	1.33	14.80	57.50	26.37
Sheboygan MSA	40	2.22	0.00	0.00	7.72	2.50	76.35	75.00	15.94	22.50	0.00	7.57	76.11	16.33
Wausau MSA	40	2.22	0.86	0.00	9.05	10.00	77.99	82.50	12.10	7.50	0.57	7.65	76.80	14.98

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2015 ACS Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF WISCONSIN					Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	2	4.44	1.92	0.00	27.44	0.00	56.40	0.00	14.24	100.00	7.55	26.42	49.06	16.98
La Crosse MSA	1	2.22	12.55	0.00	32.38	100.00	47.00	0.00	8.07	0.00	9.80	31.37	39.22	19.61
Madison MSA	5	11.11	13.91	0.00	19.49	20.00	46.99	60.00	19.61	20.00	11.93	24.43	49.43	14.20
Milwaukee MSA	20	44.44	15.39	25.00	15.91	30.00	45.42	15.00	23.28	30.00	19.39	19.39	45.41	15.82
WI Non-MSA	8	17.78	0.00	0.00	10.81	12.50	75.70	87.50	13.49	0.00	0.00	6.25	79.17	14.58
Limited Review:														
Appleton MSA	2	4.44	0.00	0.00	14.90	100.00	79.35	0.00	5.75	0.00	0.00	5.26	92.11	2.63
Eau Claire MSA	1	2.22	0.00	0.00	15.41	0.00	65.47	100.00	19.11	0.00	0.00	8.33	69.44	22.22
Fond du Lac MSA	2	4.44	0.00	0.00	40.14	0.00	55.33	100.00	4.53	0.00	0.00	21.43	78.57	0.00
Janesville MSA	0	0.00	11.54	0.00	22.44	0.00	38.68	0.00	27.34	0.00	10.34	10.34	55.17	24.14
Oshkosh MSA	1	2.22	0.00	0.00	27.85	0.00	58.95	100.00	13.20	0.00	0.00	21.21	69.70	9.09
Racine MSA	2	4.44	2.28	50.00	21.88	50.00	49.57	0.00	26.27	0.00	5.13	15.38	46.15	33.33
Sheboygan MSA	0	0.00	0.00	0.00	41.94	0.00	52.40	0.00	5.66	0.00	0.00	33.33	66.67	0.00
Wausau MSA	1	2.22	0.00	0.00	22.79	0.00	58.02	100.00	19.20	0.00	0.00	12.50	62.50	25.00

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Multifamily Loans		Low-Income Geograph		Moderate-Income Geog		Middle-Income Geograph		Upper-Income Geograph		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total	% of MF Units	% BANK	% MF Units	% BANK Loans	% MF Units*	% BANK Loans	% MF Units*	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	2	9.52	1.62	0.00	41.09	0.00	40.44	50.00	16.85	50.00	4.41	47.06	36.76	11.76
La Crosse MSA	0	0.00	10.38	0.00	42.73	0.00	40.01	0.00	6.88	0.00	8.11	45.95	37.84	8.11
Madison MSA	2	9.52	7.22	0.00	23.71	100.00	45.35	0.00	23.72	0.00	9.41	20.00	39.41	31.18
Milwaukee MSA	9	42.86	17.84	44.44	15.10	0.00	40.82	33.33	26.24	22.22	16.67	22.77	42.49	18.08
WI Non-MSA	0	0.00	0.00	0.00	12.97	0.00	77.42	0.00	9.61	0.00	0.00	18.83	73.38	7.79
Limited Review:														
Appleton MSA	3	14.29	0.00	0.00	18.04	33.33	78.37	0.00	3.58	66.67	0.00	17.74	77.42	4.84
Eau Claire MSA	1	4.76	0.00	0.00	29.64	0.00	59.89	100.00	10.47	0.00	0.00	37.84	51.35	10.81
Fond du Lac MSA	0	0.00	13.28	0.00	29.18	0.00	51.89	0.00	5.65	0.00	5.88	17.65	76.47	0.00
Janesville MSA	0	0.00	0.70	0.00	36.59	0.00	46.12	0.00	16.58	0.00	0.00	30.00	36.67	33.33
Oshkosh MSA	2	9.52	0.00	0.00	39.59	0.00	45.38	50.00	15.03	50.00	0.00	42.50	50.00	7.50
Racine MSA	1	4.76	5.16	0.00	30.56	0.00	54.49	100.00	9.79	0.00	3.33	50.00	40.00	6.67
Sheboygan MSA	1	4.76	0.00	0.00	24.65	0.00	67.65	100.00	7.70	0.00	0.00	20.83	79.17	0.00
Wausau MSA	0	0.00	6.59	0.00	13.60	0.00	72.93	0.00	6.87	0.00	5.26	10.53	84.21	0.00

* Based on 2017 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2015 ACS Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	245	14.61	1.20	0.41	21.03	23.67	55.04	51.84	22.72	24.08	1.13	15.94	54.10	28.83
La Crosse MSA	27	1.61	3.73	11.11	22.89	14.81	61.19	59.26	12.19	14.81	2.35	20.09	61.79	15.77
Madison MSA	232	13.83	3.90	9.05	15.98	15.52	55.68	57.33	23.82	18.10	2.83	12.74	57.11	27.33
Milwaukee MSA	576	34.35	8.74	3.99	13.50	7.29	38.62	38.72	39.09	50.00	5.65	9.43	37.00	47.92
WI Non-MSA	282	16.82	0.00	0.00	10.04	11.70	72.73	76.95	17.23	11.35	0.00	8.20	69.87	21.94
Limited Review:														
Appleton MSA	79	4.71	0.00	0.00	11.47	3.80	76.52	79.75	12.01	16.46	0.00	9.14	73.57	17.28
Eau Claire MSA	20	1.19	0.00	0.00	15.04	10.00	71.88	70.00	13.07	20.00	0.00	14.84	69.41	15.74
Fond du Lac MSA	29	1.73	0.00	0.00	19.30	6.90	74.58	93.10	6.11	0.00	0.00	13.34	75.76	10.90
Janesville MSA	29	1.73	7.94	10.34	18.95	20.69	44.99	37.93	28.12	31.03	5.75	15.38	45.85	33.01
Oshkosh MSA	65	3.88	0.00	0.00	16.54	15.38	65.57	63.08	17.89	21.54	0.00	14.54	65.79	19.67
Racine MSA	31	1.85	3.64	6.45	10.99	3.23	55.57	29.03	29.80	61.29	3.80	8.42	52.90	34.88
Sheboygan MSA	31	1.85	0.00	0.00	30.80	32.26	61.58	54.84	7.62	12.90	0.00	23.23	68.61	8.16
Wausau MSA	31	1.85	0.00	0.00	19.08	45.16	65.87	41.94	15.06	12.90	0.00	16.75	65.44	17.82

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses** *	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	120	14.00	2.79	4.17	25.01	34.17	50.48	40.00	21.71	21.67	1.13	15.94	54.10	28.83
La Crosse MSA	16	1.87	12.70	12.50	17.40	18.75	56.09	62.50	12.87	6.25	2.35	20.09	61.79	15.77
Madison MSA	92	10.74	2.19	3.26	17.68	20.65	50.36	45.65	27.99	30.43	2.83	12.74	57.11	27.33
Milwaukee MSA	307	35.82	11.04	3.91	11.89	10.42	35.64	29.97	41.39	55.70	5.65	9.43	37.00	47.92
WI Non-MSA	150	17.50	0.00	0.00	10.53	14.00	77.06	73.33	12.29	12.67	0.00	8.20	69.87	21.94
Limited Review:														
Appleton MSA	62	7.23	0.00	0.00	10.79	6.45	82.47	83.87	6.75	9.68	0.00	9.14	73.57	17.28
Eau Claire MSA	14	1.63	0.00	0.00	18.59	7.14	71.00	64.29	10.40	28.57	0.00	14.84	69.41	15.74
Fond du Lac MSA	9	1.05	9.75	0.00	5.61	0.00	78.22	88.89	6.42	11.11	0.00	13.34	75.76	10.90
Janesville MSA	12	1.40	1.33	0.00	27.63	16.67	37.57	50.00	33.48	33.33	5.75	15.38	45.85	33.01
Oshkosh MSA	21	2.45	0.00	0.00	18.36	0.00	56.54	61.90	25.10	38.10	0.00	14.54	65.79	19.67
Racine MSA	14	1.63	5.13	7.14	18.23	7.14	54.44	64.29	19.39	21.43	3.80	8.42	52.90	34.88
Sheboygan MSA	18	2.10	0.00	0.00	16.60	22.22	68.85	50.00	14.56	27.78	0.00	23.23	68.61	8.16
Wausau MSA	22	2.57	6.94	4.55	10.46	4.55	70.75	86.36	11.85	4.55	0.00	16.75	65.44	17.82

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2017).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF WISCONSIN					Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families***	% BANK Loans****	% Families ³⁰	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	1,077	13.56	19.23	10.80	18.25	24.50	23.75	22.70	38.78	42.00	9.41	25.07	25.97	39.54
La Crosse MSA	195	2.46	17.97	12.23	18.47	25.53	24.53	26.06	39.03	36.17	8.76	24.49	25.73	41.02
Madison MSA	620	7.81	18.45	10.96	18.13	24.09	24.84	25.58	38.57	39.37	8.39	22.17	26.98	42.45
Milwaukee MSA	1,850	23.29	22.15	8.24	16.90	16.87	20.61	20.80	40.35	54.09	7.40	20.90	25.29	46.40
WI Non-MSA	1,553	19.55	17.14	7.23	18.46	21.29	23.82	26.53	40.58	44.96	6.93	21.78	24.91	46.37
Limited Review:														
Appleton MSA	646	8.13	16.54	11.11	19.20	25.56	26.18	27.78	38.07	35.56	10.27	28.00	28.22	33.50
Eau Claire MSA	207	2.61	19.00	8.46	19.12	33.83	23.80	32.34	38.08	25.37	11.04	28.76	26.89	33.30
Fond du Lac MSA	218	2.74	17.50	8.26	18.65	22.48	26.85	29.36	37.01	39.91	10.17	26.23	27.68	35.92
Janesville MSA	382	4.81	19.66	9.84	18.49	27.13	22.32	26.06	39.53	36.97	7.03	25.48	27.16	40.33
Oshkosh MSA	512	6.45	18.03	11.71	18.42	26.98	25.56	23.21	37.99	38.10	10.81	28.78	25.34	35.07
Racine MSA	232	2.92	20.69	16.89	16.90	24.89	22.97	20.44	39.43	37.78	11.39	25.13	28.25	35.24
Sheboygan MSA	178	2.24	18.50	9.66	18.89	23.86	25.11	27.27	37.50	39.20	6.68	25.85	27.74	39.72
Wausau MSA	272	3.42	17.35	9.47	19.31	23.11	25.47	25.00	37.86	42.42	9.86	27.06	26.47	36.60

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by BANK.

³⁰ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ³¹	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	467	11.44	19.79	10.49	18.42	20.51	21.98	21.91	39.81	47.09	8.74	25.90	26.39	38.97
La Crosse MSA	106	2.60	18.34	6.00	18.90	30.00	22.11	24.00	40.65	40.00	9.63	26.54	26.85	36.98
Madison MSA	310	7.60	19.80	12.87	17.73	21.12	23.45	24.42	39.02	41.58	6.90	21.91	26.86	44.33
Milwaukee MSA	1,083	26.54	23.46	11.34	16.18	17.83	19.42	20.59	40.94	50.24	7.53	20.15	26.07	46.24
WI Non-MSA	737	18.06	17.30	7.84	19.23	21.15	23.22	24.51	40.25	46.50	7.39	22.54	25.00	45.07
Limited Review:														
Appleton MSA	329	8.06	18.20	10.51	18.61	21.66	24.88	26.11	38.32	41.72	11.96	27.23	28.19	32.62
Eau Claire MSA	95	2.33	18.58	7.53	18.53	23.66	24.16	26.88	38.72	41.94	8.74	25.12	26.46	39.69
Fond du Lac MSA	107	2.62	17.01	9.43	18.38	28.30	25.17	19.81	39.43	42.45	8.35	29.10	27.53	35.02
Janesville MSA	191	4.68	20.71	18.62	18.19	26.60	21.55	21.28	39.55	33.51	8.85	26.01	28.53	36.61
Oshkosh MSA	278	6.81	18.56	11.72	18.43	21.61	24.04	26.74	38.97	39.93	9.66	27.72	26.81	35.82
Racine MSA	199	4.88	19.97	15.82	17.80	32.65	21.90	21.43	40.33	30.10	8.21	25.33	26.13	40.34
Sheboygan MSA	86	2.11	17.69	8.14	18.36	22.09	25.62	30.23	38.33	39.53	9.88	26.86	26.32	36.93
Wausau MSA	93	2.28	18.44	11.11	18.87	23.33	23.00	27.78	39.69	37.78	13.54	30.16	26.15	30.16

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2015 ACS Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by BANK.

³¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families* **	% BANK Loans****	% Families 32	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	101	14.11	19.23	4.26	18.25	19.15	23.75	35.11	38.78	41.49	7.00	17.44	26.53	49.03
La Crosse MSA	22	3.07	17.97	0.00	18.47	22.73	24.53	31.82	39.03	45.45	8.12	18.18	26.50	47.20
Madison MSA	65	9.08	18.45	6.15	18.13	13.85	24.84	30.77	38.57	49.23	7.23	20.20	28.94	43.62
Milwaukee MSA	133	18.58	22.15	7.87	16.90	15.75	20.61	14.96	40.35	61.42	6.77	15.34	24.91	52.97
WI Non-MSA	215	30.03	17.14	6.16	18.46	14.69	23.82	23.70	40.58	55.45	7.68	18.39	25.76	48.17
Limited Review:														
Appleton MSA	36	5.03	16.54	8.82	19.20	26.47	26.18	14.71	38.07	50.00	8.37	22.36	28.40	40.88
Eau Claire MSA	21	2.93	19.00	14.29	19.12	9.52	23.80	38.10	38.08	38.10	12.81	19.83	24.79	42.56
Fond du Lac MSA	23	3.21	17.50	0.00	18.65	30.43	26.85	26.09	37.01	43.48	7.04	21.13	26.29	45.54
Janesville MSA	23	3.21	19.66	9.52	18.49	14.29	22.32	28.57	39.53	47.62	6.67	16.47	27.06	49.80
Oshkosh MSA	30	4.19	18.03	7.14	18.42	25.00	25.56	28.57	37.99	39.29	8.53	18.01	27.73	45.73
Racine MSA	12	1.68	20.69	0.00	16.90	25.00	22.97	41.67	39.43	33.33	7.42	24.61	24.61	43.36
Sheboygan MSA	11	1.54	18.50	0.00	18.89	0.00	25.11	18.18	37.50	81.82	7.27	21.80	24.06	46.87
Wausau MSA	24	3.35	17.35	8.70	19.31	13.04	25.47	39.13	37.86	39.13	8.62	21.68	26.57	43.12

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by BANK.

32 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data *			
	#	% of Total**	% Families* **	% BANK Loans****	% Families 33	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	42	13.95	19.79	2.70	18.42	16.22	21.98	35.14	39.81	45.95	8.38	20.23	23.84	47.55
La Crosse MSA	9	2.99	18.34	22.22	18.90	44.44	22.11	22.22	40.65	11.11	11.62	22.47	26.01	39.90
Madison MSA	30	9.97	19.80	20.00	17.73	16.67	23.45	30.00	39.02	33.33	7.97	20.15	28.40	43.49
Milwaukee MSA	75	24.92	23.46	9.59	16.18	15.07	19.42	19.18	40.94	56.16	7.75	14.69	24.85	52.71
WI Non-MSA	76	25.25	17.30	9.59	19.23	19.18	23.22	17.81	40.25	53.42	7.93	19.54	24.47	48.07
Limited Review:														
Appleton MSA	19	6.31	18.20	5.56	18.61	22.22	24.88	27.78	38.32	44.44	6.47	19.19	25.34	48.99
Eau Claire MSA	9	2.99	18.58	0.00	18.53	22.22	24.16	55.56	38.72	22.22	11.42	15.07	28.77	44.75
Fond du Lac MSA	8	2.66	17.01	12.50	18.38	12.50	25.17	50.00	39.43	25.00	7.25	19.69	26.42	46.63
Janesville MSA	11	3.65	20.71	0.00	18.19	27.27	21.55	45.45	39.55	27.27	9.34	18.37	28.92	43.37
Oshkosh MSA	11	3.65	18.56	0.00	18.43	9.09	24.04	45.45	38.97	45.45	5.43	18.56	25.57	50.44
Racine MSA	4	1.33	19.97	0.00	17.80	25.00	21.90	75.00	40.33	0.00	6.56	16.80	30.74	45.90
Sheboygan MSA	4	1.33	17.69	0.00	18.36	25.00	25.62	0.00	38.33	75.00	6.98	19.27	27.65	46.09
Wausau MSA	3	1.00	18.44	0.00	18.87	66.67	23.00	33.33	39.69	0.00	9.26	21.60	28.70	40.43

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2015 ACS Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.7% of loans originated and purchased by BANK.

33 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families* **	% BANK Loans****	% Families ³⁴	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	862	14.35	19.23	7.40	18.25	19.57	23.75	28.23	38.78	44.79	7.34	18.39	27.13	47.14
La Crosse MSA	172	2.86	17.97	10.78	18.47	26.35	24.53	27.54	39.03	35.33	6.73	19.15	26.30	47.81
Madison MSA	585	9.74	18.45	10.39	18.13	21.83	24.84	27.29	38.57	40.49	6.68	17.80	26.34	49.19
Milwaukee MSA	1,295	21.56	22.15	3.76	16.90	13.18	20.61	20.29	40.35	62.77	4.32	13.86	23.88	57.94
WI Non-MSA	1,553	25.86	17.14	6.57	18.46	20.62	23.82	26.59	40.58	46.22	6.64	16.77	24.40	52.19
Limited Review:														
Appleton MSA	388	6.46	16.54	7.40	19.20	24.11	26.18	27.95	38.07	40.55	7.39	21.24	28.81	42.56
Eau Claire MSA	87	1.45	19.00	17.65	19.12	24.71	23.80	22.35	38.08	35.29	10.04	22.79	25.25	41.92
Fond du Lac MSA	133	2.21	17.50	4.69	18.65	13.28	26.85	31.25	37.01	50.78	6.56	18.12	29.25	46.07
Janesville MSA	191	3.18	19.66	7.41	18.49	19.58	22.32	27.51	39.53	45.50	5.53	16.27	25.46	52.74
Oshkosh MSA	304	5.06	18.03	10.03	18.42	20.74	25.56	24.41	37.99	44.82	7.14	19.08	26.77	47.00
Racine MSA	116	1.93	20.69	8.85	16.90	18.58	22.97	26.55	39.43	46.02	7.29	17.64	26.29	48.78
Sheboygan MSA	153	2.55	18.50	11.11	18.89	22.88	25.11	28.10	37.50	37.91	7.50	17.36	25.43	49.71
Wausau MSA	167	2.78	17.35	5.56	19.31	20.37	25.47	27.78	37.86	46.30	6.68	20.15	26.04	47.14

* Based on 2016 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by BANK.

³⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families* **	% BANK Loans****	% Families 35	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Green Bay MSA	245	13.57	19.79	10.78	18.42	24.14	21.98	25.86	39.81	39.22	9.26	22.71	26.55	41.48
La Crosse MSA	49	2.71	18.34	8.51	18.90	36.17	22.11	14.89	40.65	40.43	9.88	23.63	26.96	39.53
Madison MSA	189	10.47	19.80	12.30	17.73	22.46	23.45	36.90	39.02	28.34	8.29	21.94	28.12	41.65
Milwaukee MSA	400	22.16	23.46	6.15	16.18	13.85	19.42	22.56	40.94	57.44	6.07	16.67	26.43	50.84
WI Non-MSA	482	26.70	17.30	8.51	19.23	22.98	23.22	26.81	40.25	41.70	8.71	20.37	25.12	45.80
Limited Review:														
Appleton MSA	111	6.15	18.20	10.38	18.61	18.87	24.88	29.25	38.32	41.51	9.82	21.71	28.67	39.80
Eau Claire MSA	24	1.33	18.58	13.04	18.53	13.04	24.16	34.78	38.72	39.13	10.83	21.82	26.87	40.47
Fond du Lac MSA	37	2.05	17.01	2.70	18.38	18.92	25.17	29.73	39.43	48.65	6.83	21.91	29.33	41.93
Janesville MSA	74	4.10	20.71	14.86	18.19	24.32	21.55	27.03	39.55	33.78	8.17	22.19	28.93	40.71
Oshkosh MSA	79	4.38	18.56	8.00	18.43	17.33	24.04	25.33	38.97	49.33	7.84	22.90	26.42	42.84
Racine MSA	35	1.94	19.97	3.33	17.80	26.67	21.90	30.00	40.33	40.00	7.17	18.77	27.76	46.30
Sheboygan MSA	40	2.22	17.69	17.50	18.36	17.50	25.62	27.50	38.33	37.50	10.66	21.32	27.44	40.57
Wausau MSA	40	2.22	18.44	5.13	18.87	25.64	23.00	23.08	39.69	46.15	10.47	23.83	25.76	39.94

* Based on 2017 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2015 ACS Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by BANK.

35 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Green Bay MSA	245	14.61	78.99	20.41	35.10	23.67	41.22	5,191	2,157
La Crosse MSA	27	1.61	75.08	29.63	59.26	11.11	29.63	1,341	586
Madison MSA	232	13.83	80.38	24.57	48.71	16.81	34.48	11,552	4,886
Milwaukee MSA	576	34.35	78.03	22.92	37.85	24.48	37.67	30,115	12,937
WI Non-MSA	282	16.82	79.54	37.23	55.67	16.31	28.01	13,828	6,119
Limited Review:									
Appleton MSA	79	4.71	75.25	30.38	39.24	25.32	35.44	3,112	1,315
Eau Claire MSA	20	1.19	79.33	25.00	30.00	25.00	45.00	1,896	797
Fond du Lac MSA	29	1.73	76.58	10.34	41.38	10.34	48.28	1,535	702
Janesville MSA	29	1.73	79.70	62.07	68.97	6.90	24.14	1,678	750
Oshkosh MSA	65	3.88	76.97	26.15	46.15	20.00	33.85	1,732	716
Racine MSA	31	1.85	81.61	29.03	48.39	19.35	32.26	2,843	1,264
Sheboygan MSA	31	1.85	77.25	9.68	32.26	29.03	38.71	1,625	739
Wausau MSA	31	1.85	77.44	29.03	45.16	9.68	45.16	1,890	821

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.65% of small loans to businesses originated and purchased by the bank.

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Green Bay MSA	120	13.78	78.20	32.50	40.83	20.00	39.17	5,191	2,157
La Crosse MSA	16	1.84	74.91	62.50	68.75	18.75	12.50	1,341	586
Madison MSA	103	11.83	80.77	33.98	58.25	18.45	23.30	11,552	4,886
Milwaukee MSA	307	35.25	78.57	32.90	43.97	21.17	34.85	30,115	12,937
WI Non-MSA	150	17.22	79.09	46.67	57.33	16.67	26.00	13,828	6,119
Limited Review:									
Appleton MSA	62	7.12	75.34	40.32	38.71	32.26	29.03	3,112	1,315
Eau Claire MSA	14	1.61	78.78	64.29	78.57	14.29	7.14	1,896	797
Fond du Lac MSA	9	1.03	76.51	33.33	44.44	11.11	44.44	1,535	702
Janesville MSA	12	1.38	79.48	58.33	75.00	8.33	16.67	1,678	750
Oshkosh MSA	21	2.41	76.73	42.86	66.67	23.81	9.52	1,732	716
Racine MSA	17	1.95	81.37	29.41	58.82	17.65	23.53	2,843	1,264
Sheboygan MSA	18	2.07	77.51	5.56	44.44	22.22	33.33	1,625	739
Wausau MSA	22	2.53	76.98	31.82	36.36	36.36	27.27	1,890	821

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2017).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 13.09% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

<div> QUALIFIED INVESTMENTS Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017 </div>									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Green Bay MSA	28	7,656	80	15,678	108	23,334	10.26	0	0
La Crosse MSA	2	242	25	1,172	27	1,414	0.63	0	0
Madison MSA	23	7,737	66	17,823	89	25,560	11.24	0	0
Milwaukee MSA	33	40,475	124	66,691	157	107,166	47.10	0	0
WI non-MSA	39	10,092	65	12,651	104	22,743	9.99	0	0
Limited Review:									
Appleton MSA	8	2,244	34	10,476	42	12,720	5.60	0	0
Eau Claire MSA	4	159	11	364	15	523	0.24	0	0
Fond du Lac MSA	5	2,236	11	8,620	16	10,856	4.72	0	0
Janesville MSA	4	207	9	673	13	880	0.39	0	0
Oshkosh MSA	18	1,383	22	3,586	40	4,969	2.19	0	0
Racine MSA	4	305	16	1,444	20	1,749	0.77	0	0
Sheboygan MSA	4	1,071	17	10,106	21	11,177	4.91	0	0
Wausau MSA	7	1,729	21	939	28	2,668	1.18	0	0
Statewide Investment	6	1,411	2	370	8	1,781	0.78	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017					
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Green Bay MSA	17.26	13	9.22	0.00	30.77	53.85	15.38	0	0	0	0	0	0	1.44	21.93	52.93	23.34
La Crosse MSA	1.96	5	3.55	20.00	0.00	60.00	20.00	0	0	0	0	0	0	4.80	13.86	64.64	16.71
Madison MSA	17.48	22	15.60	0.00	31.82	50.00	18.18	0	3	0	-1	-2	0	5.15	15.36	57.85	21.12
Milwaukee MSA	35.90	39	27.65	10.26	7.69	51.28	30.77	1	1	0	0	-2	0	14.65	16.20	36.13	33.02
WI Non-MSA	12.73	37	26.23	0.00	18.92	72.97	8.11	0	2	0	0	-2	0	0.00	8.80	72.15	19.04
Limited Review:																	
Appleton MSA	2.38	3	2.13	0.00	33.34	33.33	33.33	0	1	0	0	-1	0	0.00	7.03	74.98	17.99
Eau Claire MSA	0.91	4	2.84	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	12.22	71.26	16.52
Fond du Lac MSA	0.39	1	0.71	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	12.31	79.11	8.58
Janesville MSA	3.94	2	1.42	0.00	100.00	0.00	0.00	0	1	0	-1	0	0	7.98	17.27	51.83	22.92
Oshkosh MSA	2.88	6	4.26	0.00	50.00	33.33	16.67	0	0	0	0	0	0	0.00	16.29	67.13	16.58
Racine MSA	0.96	4	2.84	0.00	25.00	50.00	25.00	0	0	0	0	0	0	4.70	14.33	53.49	27.48
Sheboygan MSA	0.82	1	0.71	0.00	0.00	100.00	0.00	0	1	0	-1	0	0	0.00	23.36	69.54	7.10
Wausau MSA	2.37	4	2.84	25.00	25.00	50.00	0.00	0	1	0	0	0	-1	0.00	16.46	72.62	10.91

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Broader Regional Area/Nationwide			Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Broader Regional Area Statewide with P/M/F to serve an AA(s)	7	6,765	2	2,365	9	9,130	100	0	0

* 'Prior Period Investments' means investments made in a previous 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.