



PUBLIC DISCLOSURE

April 10, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BMO Harris Bank N.A.
Charter Number 14583

111 West Monroe Street
Chicago, Illinois 60603

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street
Washington, DC 20219

NOTE: This document is an evaluation of this national bank'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 bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this bank.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of BMO Harris Bank N.A. (BHB) with respect to the lending, investment, and service tests:

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

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to assessment area (AA) credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the bank’s AAs.
- The distribution of borrowers reflects excellent penetration among retail customer of different income levels and business customers of different sizes.
- BHB has an excellent level of qualified community development (CD) investment and grants.
- BHB makes extensive use of innovative or complex investments to support CD initiatives.
- BHB’s delivery systems are readily accessible to all portions of their AAs.
- BHB is a leader in providing CD services.

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/AA.

Census Tract (CT): Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,200 and 8,000 people, with an optimum size of 4,000 people.

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 Department of Housing and Urban Development (HUD) Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AA(s) or outside the AA(s) provided the bank has adequately addressed the CD needs of its AA(s).

Community Reinvestment Act (CRA): The statute that requires the Office of the Comptroller of the Currency (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): 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-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area (MSA) 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 refinancings, 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-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual 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.

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 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 MSA or metropolitan division (MD), as defined by the Office of Management and Budget (OMB), and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division (MD): As defined by OMB, a county or group of counties within an MSA that contains a population of at least 2.5 million. An MD consists of one or more counties

that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by OMB, as having at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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 CD.

Rated Area: A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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 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

BMO Harris Bank N.A. (BHB), headquartered in Chicago, Illinois, is a full-service interstate bank that is a wholly owned subsidiary of BMO Financial Corporation (BFC). BFC is a wholly owned subsidiary of BMO Financial Group (BFG). BFG is a highly diversified North American based financial services provider headquartered in Toronto, Canada with \$692.4 billion in assets as of January 31, 2017. BHB has one banking affiliate, BMO Harris Central N.A. which is a special purpose cash management bank, offering delivery of controlled disbursement account services for corporate customers.

BHB had total assets of \$106.2 billion as of December 31, 2016. This includes total loans and leases of \$64.2 billion that are comprised of \$26.1 billion (40.6 percent of loans and leases) in commercial loans, \$20.9 billion in real-estate related loans (32.5 percent), \$10.5 billion (10.5 percent) in other loans, \$4.4 billion (6.9 percent) in individual loans, \$1.9 billion in leases (2.9 percent), and \$463 million (0.7 percent) in agricultural loans. Total tier 1 capital as of December 31, 2016 was \$11.4 billion.

As of December 31, 2016, BHB had 603 branch office locations and 1,344 automated teller machines (ATMs) (704 deposit-taking) within its AAs. BHB had 12 rating areas consisting of 38 AAs in nine states that include Arizona, Florida, Illinois, Indiana, Kansas, Minnesota, Missouri, Washington, and Wisconsin.

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

BHB management elected not to include any activities of affiliates in this performance evaluation. Currently, there are no financial impediments to BHB's ability to help meet the credit needs within its communities. On April 29, 2013, the bank entered into a Formal Agreement with the OCC that restricted its ability to branch or acquire other institutions. This agreement was in effect throughout the entire evaluation period and was taken into consideration in our conclusions related to retail banking services. On December 1, 2015, the OCC approved BHB's acquisition of GE Capital's Transportation Finance business in the U.S., which became BMO Transportation Finance (BMOTF). BMOTF is one of the largest commercial truck and trailer finance companies in North America. Many of these loans meet the call report definition of small loans to business and are reported as such. This acquisition did not impact the bank's capacity or ability to meet the credit needs of its communities.

BHB received an overall Satisfactory rating in its last CRA evaluation by the OCC dated December 31, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated home mortgage loans; small loans to businesses and farms; CD loans; qualified investments; and CD and retail services from January 1, 2014 through December 31, 2016.

In most markets, BHB makes few, if any, multifamily or small loans to farms. The bank did not originate a sufficient quantity of multifamily loans in any AA to analyze. Some of the bank's AAs that contain more rural geographies have a sufficient quantity of small loans to farms to analyze. We determined that 20 loans made within an AA was sufficient for analysis purposes. Due to the limited volume, multifamily and small farm lending have no material impact on the lending test. If we included an analysis of these loans in a rating area, we noted it in the narrative for the applicable rating area. Tables related to multifamily and farm loans that contained no data were removed from appendix D.

For lending performance, we placed more emphasis on borrower and geographic distributions than on the aggregate performance. Borrower and geographic comparators cover all three years of the evaluation period where aggregate comparators include only data from 2015.

When there were differences in performance between loan products, including the subcategories of home mortgage loans, we emphasized the products based on the loan mix by number of loans specific to the AA over the evaluation period in determining an overall conclusion. Weightings are fully described in the narrative comments. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount.

When there were performance differences between low- and moderate-income geographies, we placed more emphasis to the geography category with more lending opportunity (e.g., businesses or owner-occupied housing units).

BHB uses innovative and flexible lending programs in order to serve AA credit needs. BHB has been aggressively expanding many mortgage programs, products, staffing, and lending efforts during the evaluation period. Examples include: implementation of a new rehabilitation/repair program to support properties in low- and moderate-income census tracts; expansion of the bank's housing finance agency (HFA) program suite which provides crucial down payment assistance; and increase in the use of the bank's self-funded grants which provide up to \$3,000 in down payment or closing cost assistance. The rehabilitation/repair program was implemented because BHB identified a need in their markets to support the financing of homes in low- and moderate-income communities that needed minor repairs. Eligible repairs include minor roof repairs, replacement of carpeting and flooring, replacement of doors and windows, etc. The grant program offers down payment and closing cost assistance to help borrowers purchase or refinance a home. They can also be used for repairs as referenced above. These programs are meant to fill a gap where other programs such as down payment assistance are not available through other non-profit agencies. The grants can be combined with a wide array of affordable mortgage products or external down payment assistance programs. These products and programs complement the bank's existing suite of products and are considered in the Product Innovation and Flexibility section of the AAs that had significant volumes of activity in these products.

Our analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that have CD as its primary purpose. Qualified investments include investments that meet the definition of CD and were made prior to the current evaluation period and are still outstanding or were made during the current evaluation period. Prior-period investments are considered at the book value of the investment at the end of the current evaluation period. Current-period investments are considered at their original investment amount. To provide perspective regarding the relative level of qualified CD investments, we allocated a portion of the bank's tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis. Unless otherwise noted, the complexity and innovativeness of investments was typical for an institution of this size and capacity.

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

Our analysis of retail branches was primarily focused on the current distribution of the bank's branches in low- and moderate-income geographies. For some AAs, we also considered branch locations in middle- or upper-income areas that were in close proximity to a low- or moderate-income geography. Proximity ranged from across the street to two miles away. We evaluated several factors to determine that these branches served individuals in these geographies. This included the likelihood that the areas surrounding the branches offered residents and businesses of the nearby low- or moderate-income geographies additional amenities or public services, such as post offices, grocery stores, strip malls, or "big box" stores. We confirmed whether the locations were along major transportation routes readily accessible by car in rural areas or public transportation in urban areas. Finally, we reviewed maps comparing branch locations to BHB's retail and small business customer locations to demonstrate these branches were serving individuals and businesses in the low- and moderate-income geographies.

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

BHB promotes financial education by offering several home ownership and financial literacy seminars and events. Two notable ones include 'Steps to Homeownership' and 'Talk with Our Kids about Money Day'. 'Steps to Homeownership' is the presentation used by the bank in outreach efforts, homebuyer seminars, and in-branch seminars to help homebuyers understand everything involved in the steps to homeownership and how BHB can help guide them along the way. BHB is an active participant in the 'Talk with Our Kids about Money Day', which is a nationwide program that encourages and supports students, teachers, and parents to have conversations about money. BHB employees participated in these special financial literacy events in April 2016. These activities are highlighted in the Community Development Services sections of the applicable AAs.

Data Integrity

As part of the OCC's ongoing supervision of BHB, we tested the accuracy of the bank's CRA-reported small business and small farm lending data; CD loans; qualified investments; and CD services. We determined that the CRA-reported data was accurate and that CD loans, qualified investments, and CD services considered during this evaluation met the definition of CD.

The OCC performed data integrity of 2014 and 2015 HMDA data that was relevant for CRA purposes. For 2016, we relied upon BFC's Corporate Audit Division's verifications of BHB's HMDA data. Any discrepancies identified were within acceptable tolerances; therefore, we deemed the data reliable.

Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area (MMA) where the bank has an office, we selected one or more AAs within that state or MMA for a full-scope review. Refer to the "Scope" section under each state and MMA rating section, as applicable, for details regarding how we selected the full-scope areas.

Ratings

The bank's overall rating is a blend of the MMAs and state ratings. We based the MMA and state ratings primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state and Multistate Metropolitan Area Rating section for details regarding how we weighted the various AAs in arriving at the overall rating.

The ratings for the Chicago-Naperville-Elgin, IL-IN-WI MMA and the state of Wisconsin carried the greatest weights in our overall conclusions. These areas represent 85.5 percent of BHB's deposits, with 63.8 percent and 21.7 percent of deposits, respectively. For the remaining rating areas, we also considered other factors such as the number of branches; the volume of reportable loans originated and purchased in each state and/or MMA; and the significance of the bank to the state or MMA based on its deposit market share and rank. We considered the bank's overall CRA rating in the context of the bank's overall impact on the communities it serves.

Community Contacts

Refer to the market profiles in appendix C for community contact information as well as detailed demographics and other performance context information, including identified AA needs and opportunities, for AAs that received full-scope reviews.

Inside/Outside Ratio

We performed this analysis at the bank level and it does not include any affiliate lending activity. BHB originated or purchased a substantial majority (78.7 percent) of its loans within the combined AAs during the evaluation period. BHB originated or purchased 68.7 percent of their small business and 93.3 percent of small farm loans within the bank's AAs. The bank's percentage of small business loans includes transactions from BMOTF, which provides

nationwide lending. BHB's percentage of small business loans within its combined AA when excluding the BMOTF transactions was 96.8 percent. BHB bank originated or purchased 93.1 percent of their home mortgage loans within the AAs, including 91.6 percent of home purchase, 94.2 percent of home improvement, and 94.1 percent of home refinance loans.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Multistate Metropolitan Area Rating

Chicago-Naperville-Elgin, IL-IN-WI MMA

CRA rating for the Chicago-Naperville-Elgin, IL-IN-WI MMA¹: Outstanding

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: Outstanding

The major factors that support this rating include:

- BHB's overall distribution of loans to borrowers of different income levels is excellent.
- BHB has an excellent level of CD loans that often demonstrate leadership and complexity and are responsive to CD needs.
- BHB has an excellent level of qualified CD investment and grants, often in leadership positions that are responsive to CD needs.
- BHB's delivery systems are readily accessible to all portions of the AAs.

Description of Institution's Operations in Chicago-Naperville-Elgin, IL-IN-WI MMA

The Chicago-Naperville-Elgin, IL-IN-WI MMA is comprised of four MDs. BHB has delineated the entirety of the Chicago-Naperville-Arlington Heights, IL and Lake County-Kenosha County, IL-WI MDs as AAs. They also delineated the portions of the Eglin, IL and the Gary, IN MDs where BHB has branch locations as AAs.

Based on June 30, 2016 Federal Deposit Insurance Corporation (FDIC) summary of deposit information, BHB has almost \$52.5 billion in deposits in these AAs, which represents 63.77 percent of the bank's total deposits. The bank made 34.55 percent of its evaluation period lending in these AAs.

BHB has 218 office locations and 623 ATMs of which 319 are deposit-taking within the AAs. The bank ranks second in deposit market share with 13.53 percent. Primary competitors include JPMorgan Chase Bank, N.A. with 388 branches and 21.88 percent, Bank of America, N.A. with 162 branches and 10.67 percent, and The Northern Trust Company with 10 branches and 7.52 percent. There are 195 additional FDIC-insured depository institutions with 2,019 offices within the bank's AAs.

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.

Refer to the market profile for the Chicago-Naperville-Elgin, IL-IN-WI MMA in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for AAs that received full-scope reviews.

Scope of Evaluation in Chicago-Naperville-Elgin, IL-IN-WI MMA

The Chicago-Naperville-Elgin, IL-IN-WI MMA is BHB's largest market; therefore, we selected two MDs for full-scope reviews to provide a more representative overview of BHB's performance in the MMA. We selected the Chicago-Naperville-Arlington Heights, IL MD as it has 94.28 percent of the MMA's deposits and BHB market share ranks them second out of 166 depository institutions. As a result, this MD is the most heavily weighted when arriving at the overall conclusion for the Chicago-Naperville-Elgin, IL-IN-WI MMA. We also selected the Elgin, IL MD as a full-scope AA because the MD was newly created as a result of the OMB MA geographic boundary revisions that became effective for CRA purposes on January 1, 2014. In addition, the Elgin, IL MD ranks third in terms of BHB's deposits with 1.76 percent, but has the second largest deposit market share with 9.27 percent. We completed limited-scope reviews in the Lake County-Kenosha County, IL-WI and Gary, IN MDs as these MDs have 2.88 percent and 1.08 percent of AA deposits and 6.57 percent and 5.00 percent of deposit market share, respectively. We based our ratings primarily on results of those areas that received full-scope reviews. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Chicago-Naperville-Elgin, IL-IN-WI MMA is outstanding. Based on full-scope reviews, the bank's performance in both the Chicago-Naperville-Arlington Heights, IL MD and the Elgin, IL MD is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. Among home mortgage loans, we placed the most emphasis on home refinance loans. BHB originated too few small farm loans in the Elgin, IL MD to conduct a meaningful analysis. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

Refer to Table 1 Lending Volume in the Chicago-Naperville-Elgin, IL-IN-WI MMA section of appendix D for the facts and data used to evaluate the bank's lending activity.

Chicago-Naperville-Arlington Heights, IL MD

BHB's lending activity reflects good responsiveness to area credit needs in the Chicago-Naperville-Arlington Heights, IL MD when considering the bank's deposits and competition. BHB ranked second out of 166 depository institutions (top 2 percent) with a deposit market share of 14.40 percent. For home purchase loans, BHB's market share of 1.03 percent ranked 24th out of 728 lenders (top 4 percent). For home improvement loans, BHB's market share of

1.56 percent ranked 13th out of 309 lenders (top 5 percent). For home refinance loans, BHB's market share of 2.30 percent ranked 10th out of 689 lenders (top 2 percent). For small loans to businesses, BHB's market share of 2.42 percent ranked eighth out of 200 lenders (top 4 percent). For small loans to farms, BHB's market share of 1.39 percent ranked 12th out of 29 lenders (top 42 percent).

Elgin, IL MD

BHB's lending activity reflects good responsiveness to area credit needs in the Elgin, IL MD when considering the bank's deposits and competition. BHB ranked third out of 36 depository institutions (top 9 percent) with a deposit market share of 9.27 percent. For home purchase loans, BHB's market share of 0.96 percent ranked 28th out of 331 lenders (top 9 percent). For home improvement loans, BHB's market share of 1.36 percent ranked 20th out of 84 lenders (top 24 percent). For home refinance loans, BHB's market share of 2.97 percent ranked seventh out of 332 lenders (top 3 percent). For small loans to businesses, BHB's market share of 3.90 percent ranked sixth out of 103 lenders (top 6 percent).

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the Chicago-Naperville-Elgin, IL-IN-WI MMA is good. The geographic distribution of home mortgage loans in the Chicago-Naperville-Arlington Heights, IL MD is adequate and in the Elgin, IL MD is good. The geographic distribution of small loans to businesses in the Chicago-Naperville-Arlington Heights, IL MD is excellent and in the Elgin, IL MD is good. The geographic distribution of small loans to farms in the Chicago-Naperville-Arlington Heights, IL MD is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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.

BHB's geographic distribution of home purchase loans in the Chicago-Naperville-Arlington Heights, IL MD is good and in the Elgin, IL MD is adequate. The geographic distribution of home improvement loans in the Chicago-Naperville-Arlington Heights, IL MD is excellent and in the Elgin, IL MD is adequate. The geographic distribution of home refinance loans in the Chicago-Naperville-Arlington Heights IL, MD is adequate and in the Elgin, IL MD is good.

In both MDs, we placed more emphasis on the bank's performance in moderate-income geographies as these areas have a higher percentage of owner-occupied housing units. This is especially significant in the Elgin, IL MD where only 0.36 percent or approximately 472 owner-occupied houses are located in low-income geographies.

Chicago-Naperville-Arlington Heights, IL MD

Home Purchase

BHB's geographic distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased in low-income geographies is below, and in moderate-

income geographies is near to, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is excellent. The percentage of home improvement loans originated or purchased in low-income geographies is near to, and in moderate-income geographies exceeds, both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders, respectively. Management implemented a new rehabilitation/repair loan program to support properties in low- or moderate-income geographies.

Home Refinance

BHB's geographic distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased in low-income geographies is well below, and in moderate-income geographies is below, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home refinance loans originated or purchased in low-income geographies is near to, and in moderate-income geographies exceeds, the aggregate percentage of all reporting lenders.

Elgin, IL MD

Home Purchase

BHB's geographic distribution of home purchase loans is adequate. The bank did not originate or purchase any home purchase loans in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is adequate. The bank did not originate or purchase any home purchase loans in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in those geographies, but exceeds the aggregate percentage of all reporting lenders

Home Refinance

BHB's geographic distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased in low-income geographies is near to, and in moderate-income geographies is below, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home refinance loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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.

Chicago-Naperville-Arlington Heights, IL MD

BHB's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies is near to, and in moderate-income geographies exceeds, the percentage of businesses located in those geographies. BHB's percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Elgin, IL MD

BHB's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in low-income geographies is well below, and in moderate-income geographies approximates, the percentage of businesses located in those geographies. BHB's percentage of small loans to businesses originated or purchased in low-income geographies is well below, and in moderate-income geographies exceeds, the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 7 in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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 farms.

Chicago-Naperville-Arlington Heights, IL MD

BHB's geographic distribution of small loans to farms is adequate considering the low percentage of small farms in low- and moderate-income geographies and that small farm lending is not a primary focus for the bank in this AA. BHB did not originate or purchase any small loans to farms in either low- or moderate-income geographies.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AAs and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the Chicago-Naperville-Elgin, IL-IN-WI MMA is excellent. The borrower distribution of home mortgage loans in both the Chicago-Naperville-Arlington Heights, IL MD and the Elgin, IL MD is good. The borrower distribution of small loans to businesses in both the Chicago-Naperville-Arlington

Heights, IL MD and the Elgin, IL MD is excellent. The borrower distribution of small loans to farms in the Chicago-Naperville-Arlington Heights, IL MD is good.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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.

BHB's borrower distribution of both home purchase and home improvement loans in the Chicago-Naperville-Arlington Heights, IL MD is good and in the Elgin, IL MD is excellent, respectively. The borrower distribution of home refinance loans in both the Chicago-Naperville-Arlington Heights IL, MD and the Elgin, IL MD is good. We considered housing costs in relation to the median family incomes in the AAs, which limits the affordability for low- and moderate-income families.

Chicago-Naperville-Arlington Heights, IL MD

Home Purchase

BHB's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentages of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home improvement loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is well below, and to moderate-income borrowers exceeds, the percentage of low- and moderate-income families in the AA. BHB's percentage of home refinance loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Elgin, IL MD

Home Purchase

BHB's borrower distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers is near to, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentages of all reporting lenders

Home Improvement

BHB's borrower distribution of home improvement loans is excellent. The percentage of home improvement loans originated or purchased to both low- and moderate-income borrowers exceeds the corresponding percentage of low- and moderate-income families in the AA and the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home refinance loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 11 in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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.

Chicago-Naperville-Arlington Heights, IL MD

The borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased is near to the percentage of small businesses in the AA but exceeds the aggregate percentage of all reporting lenders. We considered BHB's loans more responsive than many of the banks with higher market share. Four of those banks, with 54.83 percent of the small loans to business market have significant small business credit card portfolios with average loans sizes between \$7,000 and \$9,000. BHB's average small loans to business loan size was \$52,000.

Elgin, IL MD

The borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased exceeds both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 12 in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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 farms.

Chicago-Naperville-Arlington Heights, IL MD

The borrower distribution of small loans to farms is good. The percentage of small loans to farms originated or purchased is below the percentage of small farms in the AA but exceeds the aggregate percentage of all reporting lenders.

Community Development Lending

Refer to Table 1 Lending Volume in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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.

CD lending has a positive impact on the lending test conclusion in the Chicago-Naperville-Elgin, IL-IN-WI MMA. The level of CD lending in both the Chicago-Naperville-Arlington Heights, IL MD and the Elgin, IL MD is excellent.

Chicago-Naperville-Arlington Heights, IL MD

BHB is a leader in making CD loans in the Chicago-Naperville-Arlington Heights, IL MD based on the combination of volume, responsiveness, and complexity. BHB made 124 CD loans totaling \$886 million, which represents 13.1 percent of allocated tier 1 capital. By dollar volume, 51.4 percent of these loans funded community services, 29.7 percent funded affordable housing resulting in 3,086 new or renovated units in low- or moderate-income geographies, 11.3 percent funded economic development activities, and 7.6 percent funded revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- BHB provided financing of \$11.0 million to construct 67 new affordable housing units. The housing development is targeted toward veterans and their families at risk for homelessness and will offer on-site support services provided by the U.S. Department of Veterans Affairs.
- BHB provided \$8.1 million in financing to construct 33 units of affordable housing targeted to individuals with physical disabilities and/or mobility challenges. This development is located in an area of Cook County with a limited supply of affordable housing.
- BHB made a loan for \$49.7 million to revitalize a low-income geography in an area of the city targeted for redevelopment. The loan financed the construction of a mixed-use property consisting of rental housing units, retail spaces, a medical office, and parking facilities. The development was built on vacant land and has provided jobs to area residents.

Elgin, IL MD

BHB is a leader in making CD loans in the Elgin, IL MD based on the combination of volume, responsiveness, and complexity. BHB made 14 CD loans totaling \$55 million, which represents 44.2 percent of allocated tier 1 capital. By dollar volume, 34.4 percent of these loans funded economic development, 29.7 percent of these loans funded revitalization and stabilization efforts, 19.7 percent funded affordable housing resulting in 78 new units, and 16.2 percent funded community services.

Examples of CD loans in the AA include:

- BHB made a \$16.5 million loan to renovate and repurpose a building on the National Register of Historic Places into 60 new units of affordable senior housing. The building is located in a moderate-income geography and in an area designated by the state of Illinois as a redevelopment zone.
- BHB provided \$4.2 million in financing for the construction and expansion of new manufacturing facilities. The expansion will create 25 new manufacturing jobs with annual salaries expected to be between \$35,000 and \$40,000. The borrower received an Economic Development Growing Economy tax credit for this project, which is designed to provide incentive for companies to locate or expand their operations in Illinois.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 926 loans totaling \$132 million among the various flexible lending products available in the Chicago-Naperville-Arlington Heights, IL MD. In the Elgin, IL MD, BHB made 77 loans totaling \$10 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Gary, IN and Lake County-Kenosha County, IL-WI MDs is not inconsistent with the bank's overall outstanding performance under the lending test in the Chicago-Naperville-Elgin, IL-IN-WI MMA.

Refer to Tables 1 through 12 in the Chicago-Naperville-Elgin, IL-IN-WI MMA section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Chicago-Naperville-Elgin, IL-IN-WI MMA is outstanding. Based on full-scope reviews, the bank's performance in both the Chicago-Naperville-Arlington Heights, IL MD and the Elgin, IL MD is excellent.

Refer to Table 14 in the Chicago-Naperville-Elgin, IL-IN-WI MMA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Chicago-Naperville-Arlington Heights, IL MD

BHB has an excellent level of qualified CD investment and grants, often in leadership positions. The opportunities to invest are numerous as there are several Small Business Investment Corporations (SBICs) and Community Development Financial Institutions (CDFIs) in the AA. However, the market for these investments is very competitive and crowded. The dollar amount of the investments in the Chicago-Naperville-Arlington Heights, IL MD represents 7.57 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Chicago-Naperville-Arlington Heights, IL MD. BHB made 224 current- and prior-period investments totaling \$496.7 million. These investments meet community needs through affordable housing loans with CDFIs, low-income housing tax credits (LIHTCs), and investments in other equity funds. BHB also provided 575 grants and donations of more than \$14.2 million to local non-profit organizations that promote economic development, affordable housing, and community services for low- and moderate-income individuals, families, schools, and communities. In addition, BHB has more than \$161.1 million in unfunded commitments.

Examples of qualified investments in this AA include:

- A \$4.0 million investment in a CDFI that originates construction and permanent loans for multifamily rental properties in low- and moderate-income communities of Chicago, Illinois. This is a pilot program serving an important role in the rental market in low- and moderate-income communities by providing affordable rental housing in Cook County.
- An investment in an LIHTC that has allocated \$6.5 million for a 40-unit affordable family housing project in Matteson, Illinois and \$3.0 million for a 50-unit furnished affordable housing project in Wheeling, Illinois.
- Grants totaling \$3.4 million to an organization whose mission is to help vulnerable low- and moderate-income individuals stabilize their lives through providing affordable housing and social services.

Elgin, IL MD

BHB has an excellent level of qualified CD investment and grants. Investment opportunities are constrained in this AA as there are very few CDFIs and no licensed SBICs headquartered in the AA. The dollar amount of the investments in the Elgin, IL MD represents 23.76 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Elgin, IL MD. BHB made 32 current- and prior-period investments totaling \$29.7 million. They also provided 33 grants and donations of more than \$153,200 to local non-profit organizations supporting community services for low- and moderate-income individuals, families, schools, and communities.

Examples of qualified investments in this AA include investments in two mortgage-backed security pools. One is for \$6.5 million for a 102-unit multifamily affordable housing facility targeted to persons with less than 50 percent of the area median income. The second is for \$3.3 million related to 108 units of government-subsidized housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Lake County-Kenosha County, IL-WI MD is not inconsistent with the bank's overall outstanding performance under the investment test in the Chicago-Naperville-Elgin, IL-IN-WI MMA. In the Gary, IN MD, the bank's performance is weaker than the bank's overall performance in the Chicago-Naperville-Elgin, IL-IN-WI MMA as the bank made fewer qualified investments in that AA when compared to the full-scope AAs. The investment test performance in the limited-scope areas did not have an impact on the bank's overall investment test rating for Chicago-Naperville-Elgin, IL-IN-WI MMA. Refer to Table 14 in the Chicago-Naperville-Elgin, IL-IN-WI MMA section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Chicago-Naperville-Elgin, IL-IN-WI, MMA is rated outstanding. Based on full-scope reviews, the bank's performance in the Chicago-Naperville-Arlington Heights, IL MD is excellent and Elgin, IL MD is good.

Retail Banking Services

Refer to Table 15 in the Chicago-Naperville-Elgin, IL-IN-WI MMA 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.

Chicago-Naperville-Arlington Heights, IL MD

BHB's delivery systems are readily accessible throughout the AA. The bank operates 157 branch offices in the Chicago-Naperville-Arlington Heights, IL MD. The bank's distribution of branches in low-income geographies is well below and moderate-income geographies is near to the percentage of the population living within those geographies. However, when considering the 27 adjacent-serving branches, 11 serving low-income geographies and 16 serving moderate-income geographies within the AA, the distribution exceeds the percentage of the population within those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 468 ATMs in the AA, of which 254 are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and

moderate-income individuals. BHB opened one branch located in an upper-income geography in the last month of the evaluation period. The bank closed four branches, none of which were located in low- or moderate-income geographies.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Elgin, IL MD

BHB's delivery systems are accessible to essentially all portions of the AA. The bank operates 19 branch offices in the Elgin, IL MD. The bank's distribution of branches in low-income geographies exceeds and moderate-income geographies is below the percentage of the population living within those geographies. However, when considering the three adjacent-serving branches primarily serving moderate-income geographies within the AA, the distribution is near to the percentage of the population within those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and internet and mobile banking options. BHB has 38 ATMs in the AA, of which 20 are deposit-taking. These systems provide additional delivery system availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in the AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

Chicago-Naperville-Arlington Heights, IL MD

BHB is a leader in providing CD services in the Chicago-Naperville-Arlington Heights, IL MD. BHB conducted 206 financial education events with 5,121 predominately low- and moderate-income participants. The events largely focused on steps to homeownership including home buying options as well as financial education targeted towards low- and moderate-income children. BHB presented 'Steps to Homeownership' to over 300 attendees at housing fairs and resource meetings in several low- and moderate-income neighborhoods. BHB presented basic financial education to 100 participants as part of a financial literacy seminar at the bank. The bank also presented home buying options to 150 attendees at another neighborhood housing fair. Lastly, BHB taught finance to 125 children as part of 'Talk with our Kids about Money Day' at the bank.

Employees were actively involved during the evaluation period, including 161 employees who participated in 125 organizations including 110 boards, 108 committees, and 31 advisory roles. Additionally, employees recorded 1,346 volunteer hours during the evaluation period. Notable examples include:

- A senior bank officer serves on the board of directors for an organization that provides high quality educational services to more than 3,600 low-income children in the Chicago area each year.
- A senior bank officer serves on the board of an organization that is committed to ensuring low- and moderate-income individuals have access to quality education, are prepared for work at all levels, and are provided with skills and training for entrepreneurship, business development, and home and real estate ownership. This organization serves over 10,000 individuals annually.
- A senior bank officer serves on the board of an organization that provides strategic investments to 37 Chicago communities. The organization provided almost 400 grants totaling \$15.5 million and 20 loans totaling \$24.6 million during the evaluation period.

Elgin, IL MD

BHB's provides a relatively high level of CD services in the Elgin, IL MD. BHB conducted 31 financial education events with 849 participants. BHB presented 'Steps to Homeownership' to 250 attendees of a homeownership exposition. Additionally, BHB provided a housing workshop for 100 attendees from the city of Aurora, Illinois.

Eleven employees participated in 13 organizations including 10 boards, 18 committees, and two advisory roles. Additionally, employees recorded 18 volunteer hours during the evaluation period. Notable examples include:

- A bank officer is a board officer of a non-profit whose mission is to provide emergency shelter, transitional housing, and outreach to homeless persons and those at risk of homelessness. The organization serves an average of 49 people a day.
- A bank officer serves as a board officer of an organization that administers an affordable housing rental program, which provides qualified participants single-family homes for rent in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Gary, IN MD is not inconsistent with the bank's overall outstanding performance under the service test in the Chicago-Naperville-Elgin, IL-IN-WI MMA. In the Lake County-Kenosha County, IL-WI MD AA the bank's performance is weaker than the bank's overall performance in the Chicago-Naperville-Elgin, IL-IN-WI MMA due to poorer branch distribution in moderate-income geographies. The service test performance in the limited-scope areas did not have an impact on the bank's overall service test rating for Chicago-Naperville-Elgin, IL-IN-WI MMA. Refer to Table 15 in the Chicago-Naperville-Elgin, IL-IN-WI MMA section of appendix D for the facts and data that support these conclusions.

Multistate Metropolitan Area Rating

Kansas City, MO-KS MMA

CRA rating for the Kansas City, MO-KS MMA²: Outstanding

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: Outstanding

The major factors that support this rating include:

- BHB's overall distribution of loans by income level of geography and to borrowers of different income levels is excellent.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are readily accessible to all portions of the AA.

Description of Institution's Operations in Kansas City, MO-KS MMA

BHB has delineated a portion of the Kansas City, MO-KS MMA as an AA. The bank's AA includes Johnson and Wyandotte counties in the state of Kansas and Clay, Jackson, and Platte counties in the state of Missouri.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$607.1 million in deposits in this AA, which represents 0.74 percent of the bank's total deposits. The bank made 1.78 percent of its evaluation period lending in the AA.

BHB has 11 office locations and 11 ATMs, all of which are deposit-taking, within the AA. The bank ranks 16th in deposit market share with 1.26 percent. The top three competitors include UMB Bank, N.A. with 30 branches and 21.32 percent market share, Commerce Bank with 42 branches and 13.96 percent, and Bank of America, N.A. with 38 branches and 11.17 percent. There are 95 additional FDIC-insured depository institutions with 458 offices within the bank's AA.

Refer to the market profile for the Kansas City, MO-KS MMA in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

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.

Scope of Evaluation in Kansas City, MO-KS MMA

We based our rating of the Kansas City, MO-KS MMA on the area that received a full-scope review. We conducted a full-scope review of the Kansas City, MO-KS MMA, which is the only AA in the MMA. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY, MO-KS MMA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the Kansas City, MO-KS MMA is outstanding. Based on the full-scope review, the bank's performance in the Kansas City, MO-KS MMA is excellent. We placed more emphasis on home mortgage loans versus small loans to businesses. Among home mortgage loans, we placed the most emphasis on home purchase loans. This AA did not have enough home improvement or small loans to farms for analysis. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

Refer to Table 1 Lending Volume in the Kansas City, MO-KS MMA section of appendix D for the facts and data used to evaluate the bank's lending activity.

BHB's lending activity reflects excellent responsiveness to area credit needs in the Kansas City, MO-KS MMA when considering the bank's deposits and competition. BHB ranked 16th out of 99 depository institutions (top 16 percent) with a deposit market share of 1.26 percent. For home purchase loans, BHB's market share of 0.40 percent ranked 58th out of 515 lenders (top 11 percent). For home refinance loans, BHB's market share of 0.31 percent ranked 66th out of 424 lenders (top 16 percent). For small loans to businesses, BHB ranked 19th out of 134 lenders (top 14 percent) with a market share of 0.71 percent.

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the Kansas City, MO-KS MMA is excellent. The geographic distribution of home mortgage loans is excellent and small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 2 and 4 in the Kansas City, MO-KS MMA 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.

BHB's geographic distribution of home purchase loans in the Kansas City, MO-KS MMA is excellent and home refinance loans is good. We placed more emphasis on the bank's

performance in moderate-income geographies as these areas have a higher percentage of owner-occupied housing units.

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the percentage of owner-occupied housing units located those geographies and exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased in both low- and moderate-income geographies is near to the percentage of owner-occupied housing units located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the Kansas City, MO-KS MMA 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.

BHB's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in low-income geographies is below, and in moderate-income geographies approximates, the percentage of small loans to businesses located in those geographies. BHB's percentage of small loans to businesses in low-income areas exceeds, and in moderate-income areas is near to, the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the Kansas City, MO-KS MMA is excellent. The borrower distribution of home mortgage loans is excellent and small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 8 and 10 in the Kansas City, MO-KS MMA 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.

BHB's borrower distribution of home purchase loans in the Kansas City, MO-KS MMA is excellent. The borrower distribution of home refinance loans is good.

Home Purchase

BHB's borrower distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of moderate-income families in the AA. BHB's percentage of home refinance loans originated or purchased in both the low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 11 in the Kansas City, MO-KS MMA 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 borrower distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses in the AA but exceeds the aggregate percentage of all reporting lenders.

Community Development Lending

Refer to Table 1 Lending Volume in the Kansas City, MO-KS MMA 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.

BHB is a leader in making CD loans in the Kansas City, MO-KS MMA based on the combination of volume, responsiveness, and complexity. BHB made seven CD loans totaling \$61.1 million, which represents 73.9 percent of allocated tier 1 capital. By dollar volume, 58.8 percent of these loans facilitated the creation or refinancing of 346 affordable housing units and 41.2 percent was for revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- BHB extended a construction loan totaling \$21.3 million to construct a 228-unit housing project that provided 200 units of affordable housing to low- and moderate-income residents in the AA.
- BHB provided \$14.2 million in financing for construction of an office building in a moderate-income geography that provided additional space for the growing school district contributing to the revitalization and stabilization of the geography.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 242 loans totaling \$25.8 million among the various flexible lending products available in the Kansas City, MO-KS MMA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Kansas City, MO-KS MMA is outstanding. Based on a full-scope review, the bank's performance in the Kansas City, MO-KS MMA is excellent.

Refer to Table 14 in the Kansas City, MO-KS MMA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

BHB has an excellent level of qualified CD investment and grants. Investment opportunities are constrained in this AA as there are a small number of CDFIs and SBICs headquartered in the AA. The dollar amount of the investments in the Kansas City, MO-KS MMA represents 8.76 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Kansas City, MO-KS MMA. BHB made 18 current- and prior-period investments totaling more than \$6.9 million in this AA. Investments were responsive to community needs and included investments in CDFIs, LIHTC funds and projects, small business private equity funds, and mortgage-backed securities. BHB also made 52 grants and donations totaling \$336,600 to local non-profit organizations that support affordable housing development, revitalization, and community services to low- and moderate-income individuals, families, schools, and communities. In addition, prior-period investments continue to have a positive impact in the community, such as a 125-unit senior apartment building that was rehabilitated in order to preserve it as affordable housing, allowing several low-income seniors to remain in place.

Examples of qualified investments in this AA include:

- An investment in a LIHTC that has allocated \$500,000 for a project that provided 12 units of affordable housing for seniors with incomes at or below 60 percent of the area median family income. This project is in a "Green Impact Zone" targeting investments in a concentrated area suffering from long-standing disinvestment.
- An investment in a CDFI that has allocated \$892,000 to non-profit partners in the AA that provides services such as affordable housing, workforce development, and other community services.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kansas City, MO-KS MMA is rated outstanding. Based on a full-scope review, the bank's performance in the Kansas City, MO-KS MMA AA is excellent.

Retail Banking Services

Refer to Table 15 in the Kansas City, MO-KS MMA 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.

BHB's delivery systems are readily accessible to all portions of the AA. The bank operates 11 branch offices in the Kansas City, MO-KS MMA. The bank's distribution of branches in low-income geographies approximates the percentage of the population in those geographies. The bank has no branches in moderate-income geographies. However, when considering the four adjacent branches serving moderate-income geographies within the AA, the distribution exceeds the percentage of the population within those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 11 ATMs in the AA, all of which are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in the AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

BHB provides a relatively high level of CD services in the Kansas City, MO-KS MMA. BHB conducted three financial education events with 90 participants, including a housing workshop with 40 attendees.

Twelve employees participated in 13 organizations including 11 boards, eight committees, and one advisory role. Additionally, employees recorded 54 volunteer hours during the evaluation period. Notable examples include:

- A bank employee serves on the board of an organization that provides services such as crisis hotlines, emergency shelter, transitional housing, therapeutic services, advocacy,

mentoring, and violence prevention programs for runaway and homeless youth, and young children and women victimized by abuse.

- A bank employee is a board officer for an organization that provides counseling, job training, education, and rehabilitation services to recovering alcoholics and drug-addicted men with the mission of reintegrating them into society free of addiction.

Multistate Metropolitan Area Rating

Minneapolis-St. Paul-Bloomington, MN-WI MMA

CRA rating for the Minneapolis-St. Paul-Bloomington, MN-WI MMA³: Outstanding

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: Outstanding

The major factors that support this rating include:

- BHB's overall distribution of loans by income level of geography is excellent.
- BHB is a leader in making CD loans that are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are readily accessible to all portions of the AA.

Description of Institution's Operations in Minneapolis-St. Paul-Bloomington, MN-WI MMA

BHB has delineated a portion of the Minneapolis-St. Paul-Bloomington, MN-WI MMA as an AA. The bank's AA includes the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington in the state of Minnesota and Pierce and St. Croix counties in the state of Wisconsin.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$3.3 billion in deposits in the AA, which represents 4.03 percent of the bank's total deposits. The bank made 4.96 percent of its evaluation period lending in this AA.

BHB has 33 branch office locations and 30 ATMs, of which 26 are deposit-taking, within the AA. BHB ranks fifth in deposit market share with 1.90 percent. The top three competitors include Wells Fargo Bank, N.A. with 94 branches and 46.38 percent deposit market share, U.S. Bank N.A. with 98 branches and 33.48 percent, and TCF National Bank with 94 branches and 3.33 percent. There are 123 additional FDIC-insured depository institutions with 394 offices within the bank's AA.

Refer to the market profile for the Minneapolis-St. Paul-Bloomington, MN-WI MMA in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

³ 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.

Scope of Evaluation in Minneapolis-St. Paul-Bloomington, MN-WI MMA

We based our rating of the Minneapolis-St. Paul-Bloomington, MN-WI MMA on the area that received a full-scope review. We conducted a full-scope review of the Minneapolis-St. Paul-Bloomington, MN-WI MMA, which is the only AA in the MMA. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNEAPOLIS-ST. PAUL-BLOOMINGTON, MN-WI MMA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is outstanding. Based on the full-scope review, the bank's performance in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. Among home mortgage loans, we placed the most emphasis on home refinance loans. While this AA has enough home improvement and small loans to farms for analysis, the performance did not have an impact on our overall conclusion. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

Refer to Table 1 Lending Volume in the Minneapolis-St. Paul-Bloomington, MN-WI MMA section of appendix D for the facts and data used to evaluate the bank's lending activity.

BHB's lending activity reflects adequate responsiveness to area credit needs in the Minneapolis-St. Paul-Bloomington, MN-WI MMA when considering the bank's deposits and competition. BHB ranked fifth out of 127 depository institutions (top 4 percent) with a deposit market share of 1.90 percent. For home purchase loans, BHB's market share of 0.21 percent ranked 71st out of 581 lenders (top 12 percent). For home improvement loans, BHB's market share of 0.10 percent ranked 93rd out of 258 lenders (top 36 percent). For home refinance loans, BHB's market share of 0.48 percent ranked 43rd out of 553 lenders (top 8 percent). For small loans to businesses, BHB ranked 10th out of 120 lenders (top 8 percent) with a market share of 1.48 percent. For small loans to farms, BHB ranked fourth out of 28 lenders (top 14 percent).

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is excellent. The geographic distribution of home mortgage loans and small loans to businesses is excellent, and small loans to farms is poor.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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.

BHB's geographic distribution of home purchase and home refinance loans in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is excellent and home improvement loans is poor. We placed more emphasis on the bank's performance in moderate-income geographies given these areas have a higher percentage of owner-occupied housing units.

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the percentage of owner-occupied housing units located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is poor. The bank did not originate or purchase any home improvement loans in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units in those geographies, but is near to the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is excellent. The percentage of home refinance loans originated or purchased in low-income geographies exceeds, and in moderate-income geographies approximates, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home refinance loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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.

BHB's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeds, and in moderate-income geographies approximates, the percentage of businesses located in those geographies. BHB's percentage of small loans to businesses in both low- and moderate-income areas exceeds the aggregate percentage.

Small Loans to Farms

Refer to Table 7 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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 farms.

BHB's geographic distribution of small loans to farms is poor. BHB did not originate or purchase any loans in either low- or moderate-income geographies. However, less than 11 percent of farms are located in these geographies and farm loans are not a primary product of BHB. In addition, only 5 percent of all aggregate lending is in these geographies.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is good. The borrower distribution of home mortgage loans, small loans to businesses, and small loans to farms is good.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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.

BHB's borrower distribution of home purchase loans in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is excellent. The borrower distribution of home improvement and home refinance loans is good.

Home Purchase

BHB's borrower distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to low-income borrowers exceeds, and to moderate-income borrowers is near to, the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers is near to, and for moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home improvement loans originated or purchased to both low-and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home refinance loans originated or purchased to low-income borrowers exceeds, and to moderate-income borrowers approximates, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 11 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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 borrower distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses in the AA but exceeds the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 12 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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 farms.

The borrower distribution of small loans to farms is good. The percentage of small loans to farms originated or purchased is below the percentage of small farms located in the AA but exceeds the aggregate percentage of all reporting lenders.

Community Development Lending

Refer to Table 1 Lending Volume in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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.

CD lending has a positive impact on the lending test conclusion in the Minneapolis-St. Paul-Bloomington, MN-WI MMA. BHB is a leader in making CD loans in the Minneapolis-St. Paul-Bloomington, MN-WI MMA based on the combination of volume, responsiveness, and complexity. BHB made 50 CD loans totaling \$214 million, which represents 47.4 percent of allocated tier 1 capital. By dollar volume, 62.0 percent of these loans funded economic development, 32.7 percent funded affordable housing, and 5.3 percent funded community services.

Examples of CD loans in the AA include:

- BHB provided \$37.3 million in financing to construct a hotel that will provide jobs to low- and moderate-income individuals.
- BHB financed the construction of a 248-unit mixed-used, mixed-income apartment complex that will provide affordable housing to residents in the AA.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 152 loans totaling \$25.4 million among the various flexible lending products available in the Minneapolis-St. Paul-Bloomington, MN-WI MMA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is outstanding. Based on a full-scope review, the bank's performance in the Minneapolis-St. Paul-Bloomington, MN-WI MMA is excellent.

Refer to Table 14 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

BHB has an excellent level of qualified CD investment and grants. The opportunities to invest are numerous as there are several SBICs and CDFIs in the AA. However, the market for these investments is very competitive and crowded. The dollar amount of the investments in the Minneapolis-St. Paul-Bloomington, MN-WI MMA represents 9.37 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Minneapolis-St. Paul-Bloomington, MN-WI MMA. BHB made 34 current- and prior-period investments totaling more than \$41.5 million in this AA. Investments were responsive to community needs and included investments in CDFIs and LIHTC funds, which supported identified needs in the community. BHB provided 94 grants and donations of \$824,200 supporting non-profit organizations that promote economic development, affordable housing development, and provide community services to low- and moderate-income individuals, families, schools, and communities. BHB also has almost \$12.3 million in 13 unfunded commitments and over \$1.3 million in two statewide or regional prior-period investments that continue to benefit the bank's AAs.

Examples of qualified investments in this AA include:

- An investment of \$2.5 million in a CDFI that provided funding for the construction of a new 248-unit mixed-income rental housing project in a transit oriented development. The building is providing 50 units of low-income tax credit apartments, and the remaining 198 units have rent rates at or below the affordable rent rate for this MMA.
- An investment of \$3.6 million in a multi-investor fund that will help own and operate rental apartment complexes that received an allocation of LIHTCs one of which includes a 47-unit project in Ramsey, Minnesota.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Minneapolis-St. Paul-Bloomington, MN-WI MMA is rated outstanding. Based on a full-scope review, the bank's performance in the Minneapolis-St. Paul-Bloomington, MN-WI MMA AA is excellent.

Retail Banking Services

Refer to Table 15 in the Minneapolis-St. Paul-Bloomington, MN-WI MMA 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.

BHB delivery systems are readily accessible to all portions of the AA. The bank operates 33 branch offices in the Minneapolis-St. Paul-Bloomington, MN-WI MMA. The bank's distribution of branches in low-income geographies is well below and moderate-income geographies is near to the percentage of the population living within those geographies. However, when considering the six adjacent-serving branches, one serving a low-income geography and five serving moderate-income geographies within the AA, the distribution is near to the percentage of the population within low-income geographies and exceeds the percentage of population in moderate-income geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 30 ATMs in the AA, of which 26 are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in the AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

BHB provides a relatively high level of CD services in the Minneapolis-St. Paul-Bloomington, MN-WI MMA. BHB conducted four financial education events with 106 participants, including 75 participants who attended BHB's basic financial education at a seminar in cooperation with a local organization that focuses on ending generational poverty.

Twenty-five employees participated in 25 organizations including 18 boards, 13 committees, and two advisory roles. Additionally, employees recorded 100 volunteer hours during the evaluation period. Notable examples include:

- A bank employee is on the board of directors of an organization that provides vocational training and job placement programs to low-income adults.
- A bank employee is the treasurer on the board of directors for an organization whose mission is to promote and advance successful homeownership in Minnesota, with a focus on serving the needs of low- and moderate-income families and emerging markets in the area.

Multistate Metropolitan Area Rating

St. Louis, MO-IL MMA

CRA rating for the St. Louis, MO-IL MMA⁴: Outstanding

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: High Satisfactory

The major factors that support this rating include:

- BHB's distribution of loans by income level of geography and to borrowers of different income levels is good.
- BHB has an excellent level of CD loans that demonstrate leadership and complexity and are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are accessible to essentially all portions of the AA.

Description of Institution's Operations in St. Louis, MO-IL MMA

BHB has delineated a portion of the St. Louis, MO-IL MMA as an AA. The bank's AA includes St. Louis City and the counties of Jefferson, St. Charles, and St. Louis in the state of Missouri and St. Clair County in the state of Illinois.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$151.5 million in deposits in this AA, which represents 1.40 percent of the bank's total deposits. The bank made 1.58 percent of its evaluation period lending in this AA.

BHB has 16 office locations and 15 ATMs, all of which are deposit-taking, within the AA. The bank ranks 15th in deposit market share with 1.38 percent. The top four competitors include U.S. Bank N.A. with 92 branches and 15.10 percent market share, Bank of America, N.A. with 50 branches and 13.21 percent, Stifel Bank and Trust with two branches and 9.44 percent, and Commerce Bank with 48 branches and 7.66 percent. Scottrade Bank has the largest market share in the AA with 17.55 percent; however, they are not a direct competitor as they are an internet-based federal savings bank that does not have any retail branches. There are 85 additional FDIC-insured depository institutions with 645 offices within the bank's AA.

Refer to the market profile for the St. Louis, MO-IL MMA in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

⁴ 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.

Scope of Evaluation in St. Louis, MO-IL MMA

We based our rating of the St. Louis, MO-IL MMA on the area that received a full-scope review. We conducted a full-scope review of the St. Louis, MO-IL MMA, which is the only AA in the MMA. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ST. LOUIS, MO-IL MMA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the St. Louis MO-IL MMA is outstanding. Based on a full-scope review, the bank's performance in the St. Louis, MO-IL MMA is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. Among home mortgage loans, we placed the most emphasis on home refinance loans. BHB originated too few home improvement and small farm loans to conduct a meaningful analysis. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

Refer to Table 1 Lending Volume in the St. Louis MO-IL MMA section of appendix D for the facts and data used to evaluate the bank's lending activity.

BHB's lending activity reflects good responsiveness to area credit needs in the St. Louis, MO-IL MMA when considering the bank's deposits and competition. BHB ranked 15th out of 90 depository institutions (top 17 percent) with a deposit market share of 1.38 percent. For home purchase loans, BHB's market share of 0.08 percent ranked 121st out of 456 lenders (top 27 percent). No home improvement loans were made in 2015. For home refinance loans, BHB's market share of 0.23 percent ranked 72nd out of 439 lenders (top 17 percent). For small loans to businesses, BHB's market share of 0.56 percent ranked 24th out of 136 lenders (top 18 percent). No small loans to farms were made in 2015. BHB did originate home improvement and small loans to farms in other years during the evaluation period.

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the St. Louis MO-IL MMA is good. The geographic distribution of home mortgage loans is adequate and small loans to businesses is excellent.

Home Mortgage Loans

Refer to Tables 2 and 4 in the St. Louis MO-IL MMA 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.

BHB's geographic distribution of home purchase loans in the St. Louis MO-IL MMA is good and home refinance loans is adequate. We placed more emphasis on the bank's performance in moderate-income geographies as these areas have a higher percentage of owner-occupied housing units.

Home Purchase

BHB's geographic distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased in low-income geographies is below, and in moderate-income geographies exceeds, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Home Refinance

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

Small Loans to Businesses

Refer to Table 6 in the St. Louis MO-IL MMA 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.

BHB's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies is near to, and in moderate-income geographies exceeds, the percentage of businesses located in those geographies. BHB's percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the St. Louis MO-IL MMA is good. The borrower distribution of both home mortgage loans and small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 8 and 10 in the St. Louis MO-IL MMA 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.

BHB's borrower distribution of both home purchase and home refinance loans in the St. Louis MO-IL MMA is good. We considered housing costs in relation to the median family incomes in the AA, which limits the affordability for low- and moderate-income families.

Home Purchase

BHB's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to low-income borrowers exceeds, and to moderate-income borrowers is near to, the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home refinance loans originated or purchased by both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 11 in the St. Louis MO-IL MMA 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 borrower distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses in the AA but exceeds the aggregate percentage of all reporting lenders. We considered BHB's loans more responsive than many of the banks with higher market shares. The top seven of those banks, with 67.32 percent of the small loans to business market have significant small business credit card portfolios with average loans sizes between \$3,000 and \$24,000. BHB's average small loans to business loan size was \$120,000.

Community Development Lending

Refer to Table 1 Lending Volume in the St. Louis MO-IL MMA 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.

CD lending has a positive impact on the lending test conclusion. BHB is a leader in making CD loans in the St. Louis MO-IL MMA based on the combination of volume, responsiveness, and complexity. BHB made 19 CD loans totaling \$67 million, which represents 42.8 percent of

allocated tier 1 capital. By dollar volume, 42.6 percent of these loans funded affordable housing, 36.1 percent of these loans funded revitalization and stabilization, 14.7 percent funded economic development, and 6.6 percent funded community services.

Examples of CD loans in the AA include:

- BHB provided financing on an affordable housing project located in a moderate-income geography. BHB made loans totaling \$4.8 million that resulted in the construction of 32 units of affordable housing. The units are reserved for low- or moderate-income seniors, with half the units reserved for seniors with government rental housing subsidies.
- BHB provided financing for the construction of affordable housing units in a moderate-income geography. The project converted and rehabilitated a structure in downtown St. Louis that is on the national registry of historic places into a mixed-use facility. The majority of the 282 residential units are reserved for low- or moderate-income persons, while the commercial space is occupied by a local university.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 46 loans totaling \$6.0 million among the various flexible lending products available in the St. Louis MO-IL MMA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the St. Louis, MO-IL MMA is outstanding. Based on a full-scope review, the bank's performance in the St. Louis, MO-IL MMA is excellent.

Refer to Table 14 in the St. Louis, MO-IL MMA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

BHB has an excellent level of qualified CD investment and grants, often in leadership positions. Investment opportunities are constrained in this AA as there are very few CDFIs and SBICs headquartered in the AA. The dollar amount of the investments in the St. Louis, MO-IL MMA represents 9.01 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the St. Louis, MO-IL MMA. BHB made 33 current- and prior-period investments totaling almost \$14 million in this AA. BHB provided 28 grants and donations of \$181,200 supporting non-profit organizations that promote economic development, affordable housing development, and provide community services to low- and moderate-income individuals, families, schools, and communities. BHB has been able to respond to community needs by investing in activities that directly and positively impacted the AA. BHB made investments in CDFIs and LIHTC funds, which supported identified needs in the community. In addition, they provided contributions to local non-profit organizations that support affordable housing and promote summer employment

programs for youth to break the cycle of poverty and crime. Prior-period investments also continue to provide added support by renovating low-income neighborhoods.

Examples of qualified investments in this AA include:

- Two investments in a LIHTC that has allocated \$1.5 million and \$500,000 for four properties that provide a combined total of 176 units of affordable senior and family housing in the AA.
- A \$15,000 grant to a nonprofit that distributes food to more than 500 partner agencies and educates the public about the nature of and solutions to the problems of hunger. Last year, the food bank distributed more than 42,000 pounds of food that helped provide more than 28,000 meals to individuals in need.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in St. Louis, MO-IL MMA is rated high satisfactory. Based on a full-scope review, the bank's performance in the St. Louis, MO-IL MMA AA is good.

Retail Banking Services

Refer to Table 15 in the St. Louis, MO-IL MMA 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.

BHB's delivery systems are accessible to essentially all portions of the AA. The bank operates 16 branch offices in the St. Louis, MO-IL MMA. There are no branches in low-income geographies. The bank's distribution of branches in moderate-income geographies is below the percentage of the population living within those geographies. However, when considering the two adjacent-serving branches, one serving a low-income geography and one serving a moderate-income geography within the AA, the distribution is below the percentage of the population within low-income geographies and exceeds the percentage of population in moderate-income geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 15 ATMs in the AA, all of which are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in the AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income

geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

BHB's provides an adequate level of CD services St. Louis, MO-IL MMA. BHB conducted two financial education events with 40 participants.

Seven employees participated in seven organizations including eight boards, seven committees, and one advisory role. Employees did not record any volunteer hours for the evaluation period.

- A bank officer serves on the board of an organization that utilizes corporate investment and available tax incentives to stimulate the development of affordable, low- and moderate-income housing units.
- A bank employee serves as an advisory member to an organization that provides support to local non-profits who help the most disadvantaged in their communities. According to the organization, 87 percent of the people they support in the greater St. Louis area are low- or moderate-income.

State Rating

State of Arizona

CRA Rating for Arizona: Outstanding

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: High Satisfactory

- BHB’s overall distribution of loans by income level of geography is excellent and to borrowers of different income levels is good.
- BHB has an excellent level of CD loans that demonstrate leadership and complexity and are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB’s delivery systems are accessible to essentially all portions of the AAs.

Description of Institution’s Operations in Arizona

BHB has delineated three AAs in the state of Arizona. They include a portion of the Phoenix-Mesa-Scottsdale, AZ MSA and the entire Prescott, AZ and Tucson, AZ MSAs.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just under \$2.6 billion in deposits in these AAs, which represents 3.15 percent of the bank’s total deposits. The bank made 7.09 percent of its evaluation period lending in these AAs.

BHB has 50 office locations and 49 ATMs, of which 46 are deposit-taking, within these AAs. The bank ranks seventh in deposit market share with 2.53 percent. The top three competitors have 70.60 percent of the market. The competitors include JPMorgan Chase Bank, N.A. with 225 branches and 26.50 percent, Wells Fargo Bank, N.A. with 208 branches and 24.76 percent, and Bank of America, N.A. with 132 branches and 19.34 percent. There are 56 other FDIC-insured depository institutions with 436 offices within the bank’s AAs.

Refer to the market profiles for the state of Arizona in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

Scope of Evaluation in Arizona

The Phoenix-Mesa-Scottsdale, AZ MSA has the substantial majority of deposits within this rated area with 83.03 percent. BHB is ranked sixth out of 57 depository institutions in the MSA. We selected this MSA for analysis using full-scope procedures and weighted it most heavily in our overall conclusions. We analyzed the Prescott, AZ and the Tucson, AZ MSAs using limited scope procedures. BMO does not have significant market presence or deposit

market share in either of these MSAs as they are dominated by several other financial institutions. We based our ratings primarily on the results of the area that received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Arizona is outstanding. Based on the full-scope review, the bank's performance in the Phoenix-Mesa-Scottsdale, AZ MSA is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. Among home mortgage loans, we placed the most emphasis on home refinance loans. This AA did not have enough small loans to farms for analysis. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

Refer to Table 1 Lending Volume in the Phoenix-Mesa-Scottsdale, AZ MSA section of appendix D for the facts and data used to evaluate the bank's lending activity.

BHB's lending activity reflects excellent responsiveness to area credit needs in the Phoenix-Mesa-Scottsdale AZ, MSA when considering the bank's deposits and competition. BHB ranked sixth out of 57 depository institutions (top 11 percent) with a deposit market share of 2.56 percent. For home purchase loans, BHB's market share of 0.31 percent ranked 67th out of 650 lenders (top 11 percent). For home improvement loans, BHB's market share of 0.35 percent ranked 46th out of 221 lenders (top 21 percent). For home refinance loans, BHB's market share of 0.57 percent ranked 40th out of 569 lenders (top 8 percent). For small loans to businesses, BHB's market share of 1.48 percent ranked 15th out of 175 lenders (top 9 percent). This AA did not have enough small loans to farms for analysis.

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the Phoenix-Mesa-Scottsdale AZ, MSA is excellent. The geographic distribution of home mortgage loans is good and small loans to businesses is excellent.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

BHB's geographic distribution of home purchase loans in the Phoenix-Mesa-Scottsdale, AZ MSA is excellent, home improvement loans is adequate, and home refinance loans is good. We placed more emphasis on the bank's performance in moderate-income geographies as

these areas have a higher percentage of owner-occupied housing units. BHB did not originate any multifamily loans in Phoenix-Mesa-Scottsdale AZ MSA.

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in low-income geographies is near to, and in moderate-income geographies approximates, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased in low-income geographies is significantly below, and in moderate-income geographies exceeds, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home improvement loans originated or purchased in low-income geographies is below, and in moderate-income geographies exceeds, the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased in low-income geographies is below, and in moderate-income geographies is near to, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home refinance loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the state of Arizona 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.

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

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AAs and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the Phoenix-Mesa-Scottsdale MSA is good. The borrower distribution of home mortgage loans, home improvement loans, home refinancing loans, and small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

BHB's borrower distribution of home purchase, home improvement, and home refinance loans in the Phoenix-Mesa-Scottsdale MSA is good. We considered housing costs in relation to the median family incomes in the AA, which limits the affordability for low- and moderate-income families.

Home Purchase

BHB's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to low-income borrowers exceeds, and to moderate-income borrowers is near to, the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home improvement loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home refinance loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased is near to the percentage of small businesses in the AA, but exceeds the aggregate percentage of all reporting lenders.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Arizona 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.

CD lending has a positive impact on the lending test conclusion. BHB is a leader in making CD loans in the Phoenix-Mesa-Scottsdale, AZ MSA based on the combination of volume, responsiveness, and complexity. BHB made 25 CD loans totaling \$179 million, which represented 60.0 percent of allocated tier 1 capital. By dollar volume, 54.0 percent of these loans funded affordable housing, 39.7 percent funded revitalization and stabilization efforts, 4.2 percent funded economic development, and 2.1 percent funded community services.

Examples of CD loans in the AA include:

- BHB provided financing on three affordable housing projects secured by properties in low-income geographies. Two of the loans totaled \$23.0 million and were for the construction of 143 new affordable housing units. This redevelopment project is considered complex as it used multiple sources of both public and private funds.
- BHB provided an \$8.2 million construction loan that created 45 units of affordable housing in a low-income geography. This loan is responsive as there is a limited supply of affordable housing available relative to the identified population of income-eligible area residents.

Performance in the Broader Statewide or Regional Area

BHB provided a \$7.4 million loan for the construction of 48 new affordable housing units in a moderate-income geography in the broader statewide area. The project is considered complex due to numerous additional funding sources used from both public and private entities.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 133 loans totaling \$21.5 million among the various flexible lending products available in the Phoenix-Mesa-Scottsdale, AZ MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Prescott, AZ and Tucson, AZ MSAs is weaker than the bank's overall outstanding performance under the lending test in the state of Arizona due to lower geographic and borrower distributions. In addition, BHB made no CD loans in the Prescott, AZ, MSA. The weaker performance did not have a material impact on the overall conclusions for the state of Arizona.

Refer to Tables 1 through 12 in the state of Arizona section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Arizona is outstanding. Based on a full-scope review, the bank's performance in the state of Arizona is excellent.

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

BHB has an excellent level of qualified CD investment and grants. Investment opportunities are constrained in this AA as there are very few CDFIs and SBICs headquartered in the AA. The dollar amount of the investments in the Phoenix-Mesa-Scottsdale, AZ MSA represents 8.97 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Phoenix-Mesa-Scottsdale, AZ MSA. BHB made 12 current- and prior-period investments totaling \$25.8 million in this AA, mostly to LIHTC funds to support affordable housing and to support business lending and economic development, in direct response to identified community needs. BHB provided 59 donations and grants totaling \$538,800 to local non-profit organizations that promote economic development, affordable housing development and revitalization, and provide community services to low- and moderate-income individuals. BHB also has more than \$13.3 million in unfunded commitments and over \$1.1 million in five current- and prior-period statewide or regional investments that benefit one or more of the bank's AAs.

Examples of qualified investments in this AA include:

- An investment of \$9.4 million in a LIHTC fund that acquires interests in a diversified portfolio of rental apartment projects that are LIHTC-eligible or qualify for other federal tax benefits. The bank's entire investment has been allocated to a project that provides 50 units of affordable housing for families.
- An investment of \$4.0 million in an SBIC that provided funding to a company located in a low-income census tract in a historically underutilized business zone that employs 118 individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Tucson, AZ MSA is not inconsistent with the bank's overall outstanding performance under the investment test in the state of Arizona. In the Prescott, AZ MSA, the bank's performance is weaker than the bank's overall performance in the state due to a lower volume of investment activity. The investment test performance in the limited-scope areas did not have an impact on

the bank's overall investment test rating for the state of Arizona. Refer to Table 14 in the state of Arizona section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Arizona is rated high satisfactory. Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Scottsdale, AZ MSA is good.

Retail Banking Services

Refer to Table 15 in the state of Arizona 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.

BHB's delivery systems are accessible to essentially all portions of the AA. The bank operates 41 branch offices in the Phoenix-Mesa-Scottsdale, AZ MSA. BHB does not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies approximates the percentage of the population living within those geographies. However, when considering the seven adjacent-serving branches, two serving low-income geographies and five serving moderate-income geographies within the AA, the distribution is below the percentage of the population within low-income geographies and exceeds the percentage of population in moderate-income geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 41 ATMs in the AA, of which 38 are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open any branches and closed one branch in a middle-income geography in the AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

BHB's provides a relatively high level of CD services in the Phoenix-Mesa-Scottsdale, AZ MSA. BHB conducted 30 financial education events with 628 participants. BHB held 13 home buying seminars with 459 participants that included home buyer education and mortgage basics as well as affordable housing and credit builder tactics.

Thirteen employees participated in 13 organizations including nine boards and eight committees. Additionally, employees recorded 92 volunteer hours during the evaluation period. Notable examples include:

- A bank employee serves on the board of an organization that works to ensure kids growing up in low-income communities have opportunities for educational equality and excellence.
- A bank employee is a board member of an organization that provides predominately low- and moderate-income women with education, resources, and support services so they may achieve personal empowerment and financial self-sufficiency.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Prescott, AZ MSA is not inconsistent with the bank's overall performance under the service test in Arizona. In the Tucson, AZ MSA, the bank's performance is weaker than the bank's overall performance in the state due to poorer branch distribution. The service test performance in the limited-scope areas did not have an impact on the bank's overall service test rating for the state of Arizona. Refer to Table 15 in the state of Arizona section of appendix D for the facts and data that support these conclusions.

State Rating

State of Florida

CRA Rating for Florida: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- BHB's overall distribution of loans by income level of geographies is good and the distribution to borrowers of different income levels is adequate.
- BHB has an excellent level of CD loans that demonstrate leadership and complexity and are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are reasonably accessible to essentially all portions of the delineated AAs.

Description of Institution's Operations in Florida

BHB has delineated seven AAs in the state of Florida. They include the entire North Port-Bradenton-Sarasota, FL; Cape Coral-Ft. Myers, FL; Naples-Immokalee-Marco Island, FL; and Punta Gorda, FL MSAs; the entire West Palm Beach, FL MD; Hillsborough county in the Tampa-St. Petersburg-Clearwater, FL MSA; and Lake, Orange, and Seminole counties in the Orlando-Kissimmee-Sanford, FL MSA. BHB sold its branch offices located in the Orlando-Kissimmee-Sanford, FL MSA on June 3, 2016. Since BHB was in this area for a substantial part of the evaluation period, 30 out of 36 months, we included a limited-scope analysis of this AA in the evaluation.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$832.0 million in deposits in these AAs, which represents 1.01 percent of the bank's total deposits. The bank made 3.86 percent of its evaluation period lending in these AAs.

BHB has 18 office locations and 23 ATMs, of which 17 are deposit-taking, within these AAs. The bank ranks 30th in deposit market share with 0.48 percent. The top four competitors have 55.23 percent of the market and include Bank of America, N.A. with 224 branches and 18.30 percent, Wells Fargo Bank, N.A. with 233 branches and 16.88 percent, SunTrust Bank with 198 branches and 13.45 percent, and JPMorgan Chase Bank, N.A. with 174 branches with 6.60 percent. There are 119 additional FDIC-insured depository institutions with 1,138 offices within the bank's AAs.

The bank's business strategy in the state of Florida is focused on wealth management and not standard retail bank operations. As a result, BHB has limited branch presence and retail product delivery in most of its Florida AAs, which we considered when determining our conclusions.

Refer to the market profiles for the state of Florida in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for AAs that received full-scope reviews.

Scope of Evaluation in Florida

We completed a full-scope review for the North Point-Sarasota-Bradenton, FL MSA as it has the largest percentage of deposits, 56.32 percent, and the largest percent of deposit market share, 2.43 percent, in the state. As a result, this MSA will also be the most heavily weighted when arriving at the overall conclusion. We completed a full-scope review of the Punta Gorda, FL MSA to get a more representative overview of BHB's performance in the state. While the Punta Gorda, FL MSA has the third lowest percent of BHB's deposits in the state at 4.51 percent, it has the second largest deposit market share at 1.10 percent of the remaining AAs. We completed limited-scope reviews for the Cape Coral-Fort Myers, FL; Naples-Immokalee-Marco Island; Orlando-Kissimmee-Sanford, FL; and Tampa-St. Petersburg-Clearwater, FL MSAs; and the West Palm Beach-Boca Raton-Delray Beach, FL MD. We based our ratings primarily on results of those areas that received full-scope reviews. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Florida is rated high satisfactory. Based on the full-scope reviews, the bank's performance in the North Point-Sarasota-Bradenton, FL MSA is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. Among home mortgage loans, we placed the most emphasis on home purchase loans. While this AA has enough home improvement loans to complete an analysis, the performance did not have an impact on our overall conclusion. The AA did not have enough small loans to farms for analysis.

The bank's performance in the Punta Gorda, FL MSA is adequate. We placed more emphasis on home mortgage loans versus small loans to businesses. The AA did not originate any home improvement loans or small loans to farms, and did not originate enough home refinance loans to complete a meaningful analysis. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

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

North Point-Sarasota-Bradenton, FL MSA

BHB's lending activity reflects excellent responsiveness to area credit needs in the North Point-Sarasota-Bradenton, FL MSA when considering the bank's deposits and competition. BHB ranked eighth out of 40 depository institutions (top 20 percent) with a deposit market share of 2.43 percent. For home purchase loans, BHB's market share of 0.49 percent ranked 48th out of 638 lenders (top 8 percent). For home improvement loans, BHB's market share of 0.56 percent ranked 26th out of 120 lenders (top 22 percent). For home refinance loans, BHB's market share of 0.68 percent ranked 31st out of 455 lenders (top 7 percent). For small loans to businesses, BHB ranked 15th out of 127 lenders (top 12 percent) with a market share of 1.09 percent.

Punta Gorda, FL MSA

BHB's lending activity reflects excellent responsiveness to area credit needs in the Punta Gorda, FL MSA when considering the bank's deposits and competition. BHB ranked 15th out of 18 depository institutions (bottom 17 percent) with a deposit market share of 1.10 percent. For home purchase loans, BHB's market share of 0.29 percent ranked 67th out of 333 lenders (top 20 percent). For home refinance loans, BHB's market share of 0.40 percent ranked 41st out of 215 lenders (top 19 percent). For small loans to businesses, BHB ranked 19th out of 58 lenders (top 33 percent) with a market share of 0.34 percent.

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in Florida is good. The geographical distribution of home mortgage loans in the North Point-Sarasota-Bradenton, FL MSA is good. The geographical distribution of home mortgage loans in the Punta Gorda, FL MSA is poor. The geographical distribution of small loans to businesses in the North Point-Sarasota-Bradenton, FL MSA is excellent and in the Punta Gorda, FL MSA is good.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

BHB's geographic distribution of home purchase loans in the North Point-Sarasota-Bradenton, FL MSA is good and in the Punta Gorda, FL MSA is poor. The geographic distribution of home improvement loans in North Point-Sarasota-Bradenton, FL MSA is adequate. The geographic distribution of home refinance loans in North Point-Sarasota-Bradenton, FL MSA is excellent. We placed more emphasis on the bank's performance in moderate-income geographies. In the North Point-Sarasota-Bradenton, FL MSA these areas have a higher percentage of owner-occupied housing units. In the Punta Gorda, FL MSA, there are no low-income geographies.

North Point-Sarasota-Bradenton, FL MSA

Home Purchase

BHB's geographic distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased in low-income geographies exceeds, and in moderate-income geographies is well below, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home purchase loans originated or purchased in low-income geographies exceeds, and in moderate-income geographies is near to, the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is adequate. The bank did not originate or purchase any home improvement loans in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units and exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is excellent. The percentage of home refinance loans originated or purchased in low- and moderate-income geographies exceeds the percentages of owner-occupied housing units located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Punta Gorda, FL MSA

Home Purchase

BHB's geographic distribution of home purchase loans is poor. There are no low-income geographies in the Punta Gorda, FL MSA. The percentage of home purchase loans originated or purchased in moderate-income geographies is significantly below the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home purchase loans originated or purchased in moderate-income geographies is well below the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the state of Florida 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.

North Point-Sarasota-Bradenton, FL MSA

BHB's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in low- and moderate-income geographies exceeds the percentage of businesses located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Punta Gorda, FL MSA

BHB's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in moderate-income geographies is below the percentage of businesses located in those geographies and approximates the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AAs and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in Florida is adequate. The borrower distribution of home mortgage loans in both the North Point-Sarasota-Bradenton, FL MSA and the Punta Gorda, FL MSA is adequate. The borrower distribution of small loans to businesses in the North Point-Sarasota-Bradenton, FL MSA is good and in the Punta Gorda, FL MSA is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

BHB's borrower distribution of home purchase, home improvement, and home refinance loans in the North Point-Sarasota-Bradenton, FL MSA is adequate. BHB's borrower distribution of home purchase loans in the Punta Gorda, FL MSA is adequate. We considered housing costs in relation to the median family incomes in the AA, which limits the affordability for low- and moderate-income families.

North Point-Sarasota-Bradenton, FL MSA

Home Purchase

BHB's borrower distribution of home purchase loans is adequate. The percentage of home purchase loans originated or purchased to low-income borrowers is significantly below, and to moderate-income borrowers is below, the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers is near to, the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is near to, and to moderate-income borrowers below, the percentage of those families in the AA. BHB's

percentage of home improvement loans originated or purchased to low-income borrowers exceeds, and to moderate-income borrowers is near to, the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased to low-income borrowers is significantly below, and to moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home refinance loans originated or purchased to low-income borrowers is well below, and to moderate-income borrowers exceeds, the aggregate percentage of all reporting lenders.

Punta Gorda, FL MSA

Home Purchase

BHB's borrower distribution of home purchase loans is adequate. The percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers is below the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to low-income borrowers approximates, and to moderate-income borrowers is well below, the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

North Point-Sarasota-Bradenton, FL MSA

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased is near to the percentage of small businesses in the AA and exceeds the aggregate percentage of all reporting lenders.

Punta Gorda, FL MSA

The borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is well below the percentage of small businesses in the AA, but approximates the aggregate percentage of all reporting lenders.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Florida 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

CD lending has a positive impact on the lending test conclusion. The level of CD lending in both the North Point-Sarasota-Bradenton, FL MSA and the Punta Gorda, FL MSA is excellent.

North Point-Sarasota-Bradenton, FL MSA

BHB has an excellent level of CD loans in the North Point-Sarasota-Bradenton, FL MSA. BHB made five CD loans totaling \$4.4 million, which represented 6.9 percent of allocated tier 1 capital. By dollar volume, 56.8 percent of these loans funded revitalization and stabilization and 43.2 percent funded community services of the AA.

Examples of CD loans in this AA include:

- BHB provided \$2.5 million in financing to renovate a business that helped to revitalize a moderate-income geography within the AA.
- BHB financed a \$1 million line of credit to an organization that provides social services to predominately low- and moderate-income children and their families.

Punta Gorda, FL MSA

BHB has an excellent level of CD loans in the Punta Gorda, FL MSA. BHB made a CD loan totaling \$700,000, which represented 13.7 percent of allocated tier 1 capital. BHB extended a loan to finance the improvements to a small business property, including an energy efficient roof and solar panels.

Performance in the Broader Statewide or Regional Area

BHB provided three CD loans totaling \$37.3 million to benefit the greater state of Florida. By dollar volume, 56.0 percent of these loans funded revitalization, 30.6 percent funded affordable housing, and 13.4 percent funded economic development. One loan is to construct a mixed used complex within a moderate-income geography as part of the town's redevelopment plan. BHB also funded the acquisition and capital improvements of a 240 unit, affordable multifamily apartment building located in a moderate-income geography.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 15 loans totaling \$2.6 million among the various flexible lending products available in the North Point-Sarasota-Bradenton, FL MSA. In the Punta Gorda, FL MSA, BHB makes limited use of innovative and flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Orlando-Kissimmee-Sanford, FL MSA and Tampa-St. Petersburg-Clearwater, FL MSA is not inconsistent with the bank's overall high satisfactory performance under the lending test in Florida. In the Cape Coral-Fort Myers, FL MSA and the West Palm Beach-Boca Raton-Delray Beach, FL MD the bank's performance is weaker than the bank's overall performance in the state due to poorer borrower distribution. Performance in the Naples-Immokalee-Marco Island, FL MSA is weaker due to poorer performance in both geographic and borrower distribution. The lending test performance in the limited-scope areas did not have an impact on the bank's overall lending test rating for the state of Florida. Refer to Tables 1 through 12 in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Florida is outstanding. Based on the full-scope reviews, the bank's performance in the North Point-Sarasota-Bradenton, FL MSA is excellent and the Punta Gorda, FL MSA is good.

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

North Point-Sarasota-Bradenton, FL MSA

BHB has an excellent level of qualified CD investment and grants. Investment opportunities are constrained in this AA as there are very few CDFIs and no SBICs headquartered in the AA. The dollar amount of the qualified investments in the North Port-Sarasota-Bradenton, FL MSA represents 14.37 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the North Port-Sarasota-Bradenton, FL MSA. BHB made five current- and prior-period investments totaling more than \$8.9 million in this AA, mostly supporting small business investment companies and affordable housing. Investments were responsive to identified community needs. In addition, BHB provided 34 grants and donations totaling \$269,900 to local non-profit organizations that provide community services to low- and moderate-income individuals through donations to food pantries, homeless shelters, financial education, and other services.

Examples of qualified investments in this AA include:

- An investment of almost \$6.7 million in a mortgage-backed security pool for a 196-unit multifamily affordable housing facility where 85 percent of the units are targeted to persons making less than 60 percent of the area median income and the remaining 15 percent to persons making less than 50 percent of the area median income.
- Three grants totaling \$12,500 to an organization that partners with numerous local agencies to bring about lasting change in the community and in low- and moderate-income people's lives by focusing on education, income, and health.

Punta Gorda, FL MSA

BHB has a significant level of qualified CD investment and grants. Investment opportunities are constrained in this AA as there are no CDFIs nor SBICs headquartered in the AA. The dollar amount of the qualified investments in the Punta Gorda, FL MSA represents 4.26 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits a good level of responsiveness to the CD needs in the Punta Gorda, FL MSA. BHB has one prior-period investment in an affordable housing loan pool with an outstanding balance of \$196,800. In addition, BHB made seven grants and donations totaling \$26,100, which included funding for affordable housing programs and donations to organizations that support community services for low- and moderate-income individuals and families.

An example of qualified investments in this AA include four grants totaling \$20,000 to an organization that provides low- and moderate-income children with after school and summer programs in academic and financial education, character and leadership development, health and life skills, and sports, fitness, and recreation.

Greater Statewide or Regional Area

BHB also has four current- and prior-period qualified investments that benefit the greater statewide or regional area totaling just over \$1.2 million relating to affordable housing and community reinvestment, which has a positive impact on the overall investment test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Orlando-Kissimmee-Sanford, FL MSA and Tampa-St. Petersburg-Clearwater, FL MSA is not inconsistent with the bank's overall outstanding performance under the investment test in the state of Florida. In the Cape Coral-Fort Myers, FL MSA; West Palm Beach-Boca Raton-Delray Beach, FL MD; and Naples-Immokalee-Marco Island, FL MSA; the bank's performance is weaker than the bank's overall outstanding performance under the investment test in the state of Florida due to lower volumes of qualified investments. The investment test performance in the limited-scope areas did not have a significant impact on the bank's overall investment test rating for the state of Florida rating. Refer to Table 14 in the state of Florida section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Florida is rated low satisfactory. Based on full-scope reviews, the bank's performance in the North Port-Bradenton-Sarasota, FL MSA is good and in the Punta Gorda, FL MSA is adequate. The adequate performance in the limited-scope areas is considered in the overall service test rating.

Retail Banking Services

Refer to Table 15 in the state of Florida 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.

North Point-Sarasota-Bradenton, FL MSA

BHB's delivery systems are accessible to essentially all portions of the AA. The bank operates 10 branch offices in the North Point-Sarasota-Bradenton, FL MSA. The bank does not have any branches in low-income geographies; however, only 2.67 percent of the population in this MSA lives in these geographies. BHB's distribution of branches in moderate-income geographies is near to the percentage of the population living within those geographies. When considering the four adjacent-serving branches that serve moderate-income geographies within the AA, the distribution exceeds the percentage of population in moderate-income geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 10 ATMs in the AA, all which are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open any branches and closed one branch located in a middle-income geography in the AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Punta Gorda, FL MSA

BHB's delivery systems are reasonably accessible throughout the AA. The bank operates one branch office in the Punta Gorda, FL MSA in a middle-income geography. There are no low-income geographies within this AA and only 7.06 percent of the population in this MSA lives in moderate-income geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has one ATM in the AA, which is deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BHB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in the AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

North Point-Sarasota-Bradenton, FL MSA

BHB provides an adequate level of CD services in the North Port-Bradenton-Sarasota, FL MSA. BHB did not conduct any financial education events during the evaluation period. Employees did not record any volunteer hours for the evaluation period.

Seven employees participated in seven organizations including seven boards and six committees. An example includes a bank employee who serves on the board of an organization that provides free, quality medical care and referral services to low-income, uninsured, and under-insured adult residents of the AA.

Punta Gorda, FL MSA

BHB provides an adequate level of CD services in the Punta Gorda, FL MSA. BHB conducted one financial education event related to personal credit and entrepreneurship with 15 participants. Additionally, employees volunteered for six and a half hours during the evaluation period.

Three employees participated in three organizations including two boards and one committee. One example includes an employee who serves on the board of an organization whose mission is to alleviate and prevent homelessness and hunger of individuals in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Cape Coral-Fort Myers, FL MSA; Naples-Marco Island, FL MSA; Orlando-Kissimmee-Sanford, FL MSA; Tampa-St. Petersburg-Clearwater, FL MSA; and the West Palm Beach, FL MD is not inconsistent with the bank's overall low satisfactory performance under the service test in Florida. Although access to low- and moderate-income geographies and individuals of different income levels in these AAs is limited, BHB's delivery systems are not intended to serve consumer market segments as the bank's business strategy in Florida is focused on wealth management. Refer to Table 15 in the state of Florida section of appendix D for the facts and data that support these conclusions.

State Rating

State of Illinois

CRA Rating for Illinois⁵: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors that support this rating include:

- BHB's overall geographic distribution of loans by income level of geography and distribution of loans to borrowers of different income levels is excellent.
- BHB has an excellent level of CD loans that demonstrate leadership and complexity and are responsive to CD needs.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are readily accessible to all portions of the AA.

Description of Institution's Operations in Illinois

BHB has delineated one AA in the state of Illinois, which is the entire Rockford, IL MSA. The state rating does not include the counties in the Chicago-Naperville-Elgin, IL-IN-WI MMA or St. Louis MO-IL MMA that are included in the multistate MSA analysis.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$723.6 million in deposits in this AA, which represents 0.88 percent of the bank's total deposits. The bank made 1.36 percent of its evaluation period lending in the AA.

BHB has 11 office locations and 44 ATMs, of which 17 are deposit-taking, within the state. The bank ranks second in deposit market share with 12.38 percent. Primary competitors include Alpine Bank & Trust Co. with 17 branches and 18.48 percent market share, JPMorgan Chase Bank, N.A. with seven branches and 10.94 percent, and Associated Bank, N.A. with six branches and 10.38 percent. There are 22 additional FDIC-insured depository institutions with 55 offices within the bank's AA.

Refer to the market profiles for the state of Illinois in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

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.

Scope of Evaluation in Illinois

We based our rating of the state of Illinois on the area that received a full-scope review. We conducted a full-scope review of the Rockford, IL MSA, which is the only AA in the state that is not part of a multistate MSA. Refer to the table in appendix A for more information.

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 the state of Illinois is outstanding. Based on the full-scope review, the bank's performance in the Rockford, IL MSA is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. Among home mortgage loans, we placed the most emphasis on home refinance loans. While this AA has enough small loans to farms for analysis, the performance did not have an impact on our overall conclusion. Refer to Scope of Evaluation section for details on how weightings were determined.

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.

BHB's lending activity reflects excellent responsiveness to area credit needs in the Rockford, IL MSA when considering the bank's deposits and competition. BHB ranked second out of 26 depository institutions (top 8 percent) with a deposit market share of 12.38 percent. For home purchase loans, BHB's market share of 1.27 percent ranked 18th out of 196 lenders (top 9 percent). For home improvement loans, BHB's market share of 1.22 percent ranked 18th out of 52 lenders (top 35 percent). For home refinance loans, BHB's market share of 2.84 percent ranked 10th out of 193 lenders (top 5 percent). For small loans to businesses, BHB ranked second out of 63 lenders (top 3 percent) with a market share of 5.64 percent. For small loans to farms, BHB ranked first out of 15 lenders (top 7 percent).

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the state of Illinois is excellent. The geographic distribution of home mortgage loans is good, small loans to businesses is excellent, and small loans to farms is poor.

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.

BHB's geographic distribution of home purchase and home improvement loans in the Rockford, IL MSA is adequate and home refinance loans is good. We placed more emphasis on the bank's performance in moderate-income geographies as these areas have a higher percentage of owner-occupied housing units.

Home Purchase

BHB's geographic distribution of home purchase loans is adequate. The percentage of home purchase loans originated or purchased in low-income geographies is well below, and in moderate-income geographies is below, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is adequate. The bank did not originate any home improvement loans in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units and exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased in low-income geographies is well below, and in moderate-income geographies approximates, the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home refinance loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

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.

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

Small Loans to Farms

Refer to Table 7 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 farms.

BHB's geographic distribution of small loans to farms is poor. While BHB did not originate or purchase any loans in either low- or moderate-income geographies, there are less than 12 percent of farms are located in these geographies. In addition, less than one percent of aggregate lending of all reporting lenders are in these geographies.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the state of Illinois is excellent. The borrower distribution of home mortgage loans is good, small loans to businesses is excellent, and small loans to farms is adequate.

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.

BHB's borrower distribution of home purchase loans in the Rockford, IL MSA is excellent. The geographic distribution of home improvement and home refinance loans is good.

Home Purchase

BHB's borrower distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers is below the percentage of low-income families in the AA, but is considered good when taking into account the relationship of housing values to the annual income of low-income families. The percentage of home purchase loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. BHB's percentage of home purchase loans originated or purchased to low-income borrowers exceeds, and to moderate-income borrowers is near to, the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers is near to the percentage of low-income families in the AA. The percentage of home improvement loans originated or purchased to moderate-income borrowers is below the percentage of moderate-income families in the AA. BHB's percentage of home improvement loans originated or purchased to low-income borrowers exceeds, and to moderate-income borrowers well below, the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of families in the AA. The percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. BHB's percentage of home refinance loans originated or purchased to low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased exceeds the percentage of businesses in the AA as well as the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 12 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

The borrower distribution of small loans to farms is adequate. The percentage of small loans to farms originated or purchased is well below the percentage of small farms located in the AA but exceeds the aggregate percentage of all reporting lenders.

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.

BHB is a leader in making CD loans in the Rockford, IL MSA based on the combination of volume, responsiveness, and complexity. BHB made 12 CD loans totaling \$34.1 million, which represented 34.5 percent of allocated tier 1 capital. By dollar volume, 26.6 percent of these loans funded economic development and 73.4 percent funded community services. Most notably, BHB provided financing to a health clinic that primarily serves low- or moderate-income individuals.

In addition, we considered two CD loans totaling \$5.7 million that provided support to two organizations located in the greater statewide or regional area.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 62 loans totaling \$5.2 million among the various flexible lending products available in the Rockford, IL MSA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Illinois is outstanding. Based on a full-scope review, the bank's performance in the state of Illinois is excellent.

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.

BHB has an excellent level of qualified CD investment and grants, often in leadership positions. Investment opportunities are constrained in this AA as there are no CDFIs nor SBICs headquartered in the AA. The dollar amount of the qualified investments in the Rockford, IL MSA represents 11.19 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Rockford, IL MSA. BHB made nine current- and prior-period qualified investments totaling \$10.6 million in this AA. Investments were responsive to community needs and included qualified investments in LIHTC funds and various small business lending funds. BHB provided 64 grants and donations totaling \$396,800 that promote economic development in low- and moderate-income communities, support affordable housing development, and provide community services to low- and moderate-income individuals and families. BHB also has two unfunded commitments of over \$6.1 million that benefit the Rockford, IL MSA. In addition, BHB made 15 qualified investments totaling almost \$1.9 million in the broader statewide or regional area.

Examples of qualified investments in the AA include:

- An investment of \$5.6 million in a LIHTC fund that acquires interests in affordable housing projects that are LIHTC-eligible or qualify for other federal tax benefits. The investment is allocated for a 175-unit affordable family housing project that offers on-site Head Start daycare as well as computer classes for adults and youth.
- An investment of \$572,000 to a CDFI that exclusively serves nonprofit corporations in the AA by providing below-market capital financing, facilities planning, facilities development, research, education, and advocacy.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Illinois is outstanding. Based on the full-scope review, the bank's performance in the Rockford, IL MSA is excellent.

Retail Banking Services

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.

BHB's delivery systems are readily accessible to all portions of the AA. The bank operates 11 full-service branches in the Rockford, IL MSA. The bank's distribution of branches in low- and moderate-income geographies exceeds the percentage of the population living within those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 44 ATMs in the AA, of which 17 are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB closed two branches in upper-income geographies during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

BHB provides an adequate level of CD services in the Rockford, IL MSA. No financial education seminars were conducted during the evaluation period.

Four employees served in a leadership roles for six different CD organizations. These employees provided 468 hours of CD services through their participation on five boards and four committees. In addition, one employee served 36 hours as a volunteer. Notable examples of BHB's CD services include:

- A bank manager serves on the board of an organization whose mission is to align community resources in support of public school strategies to raise student achievement, improve the health and happiness of children, and advance the economic and social well-being of the community.
- A bank manager serves on the board of an organization that serves over 200 low- and moderate-income adults and children with intellectual and developmental disabilities and their families each month through a wide variety of programs, services, and activities.

State Rating

State of Indiana

CRA Rating for Indiana⁶: Outstanding

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: High Satisfactory

The major factors that support this rating include:

- BHB's overall distribution of loans by income level of geography and to borrowers of different income levels is good.
- BHB has an excellent level of CD loans that demonstrate leadership and complexity and are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are accessible to essentially all portions of the AAs.

Description of Institution's Operations in Indiana

BHB has delineated three AAs in the state of Indiana. They include portions of the Indianapolis-Carmel-Anderson, IN MSA; the entire Kokomo, IN MSA; and the non-MSA counties of Grant, Rush and Tipton. BHB sold their branches in the Terre Haute, IN MSA and two branches in non-MSA counties to First Farmers Bank and Trust on November 14, 2014. They closed two branches in the non-MSA county of Wayne on January 30, 2015. We did not complete an analysis of these areas since BHB was in these areas for only about a third of the evaluation period, 11 and 13 months, respectively. The state of Indiana rating does not include the Gary, IN MSA counties that are included in multistate MSA analysis.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$2.6 billion in deposits in these AAs, which represents 3.21 percent of the bank's total deposits. The bank made 5.41 percent of its evaluation period lending in these AAs.

BHB has 44 office locations and 47 ATMs, of which 44 are deposit-taking, within these AAs. The bank ranks fifth in deposit market share with 5.84 percent. The top four competitors include JPMorgan Chase Bank, N.A. with 76 branches and 23.53 percent, PNC Bank, N.A. with 65 branches and 15.96 percent, Fifth Third Bank with 38 branches and 8.89 percent, and The Huntington National Bank with 46 branches and 7.22 percent deposit market share.

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

There are 42 additional FDIC-insured depository institutions with 247 offices within the bank's AAs.

Refer to the market profiles for the state of Indiana in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

Scope of Evaluation in Indiana

BHB has three AAs in the state of Indiana. The Indianapolis-Carmel-Anderson, IN MSA has the substantial majority of deposits within this rated area with 89.87 percent. We selected this AA for analysis using full-scope procedures and weighted it most heavily in our overall conclusions. The Kokomo, IN MSA and the non-MSA IN areas were analyzed using limited scope procedures. While BHB does have significant deposit market share at 16.43 percent in the Kokomo MSA, three other depository institutions have over 80 percent of the deposit market. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Indiana is outstanding. Based on a full-scope review, the bank's performance in the Indianapolis-Carmel-Anderson, IN MSA is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. Among home mortgage loans, we placed the most emphasis on home refinance loans. While this AA has enough home improvement and small loans to farms for analysis, the performance did not have an impact on our overall conclusion. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

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

BHB's lending activity reflects excellent responsiveness to area credit needs in the Indianapolis-Carmel-Anderson, IN MSA when considering the bank's deposits and competition. BHB is ranked fifth out of 41 depository institutions (top 12 percent) with a deposit market share of 5.52 percent. For home purchase loans, BHB's market share of 0.58 percent ranked 41st out of 449 lenders (top 9 percent). For home improvement loans, BHB's market share of 0.49 percent is ranked 34th out of 149 lenders (top 23 percent). For home refinance loans, BHB's market share of 1.39 percent is ranked 19th out of 414 lenders (top 5 percent). For small loans to businesses, BHB market share of 3.05 percent is ranked ninth out of 117 lenders (top 8 percent). For small loans to farms, BHB's market share of 2.51 percent is ranked ninth out of 31 lenders (top 29 percent).

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the Indianapolis-Carmel-Anderson, IN MSA is good. The geographic distribution of both home mortgage loans and small loans to businesses is good, and small loans to farms is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

BHB's geographic distribution of home purchase loans in the Indianapolis-Carmel-Anderson, IN MSA is excellent. The geographic distribution of home improvement and home refinance mortgage loans is adequate. We placed more emphasis on the bank's performance in moderate-income geographies as these areas have a higher percentage of owner-occupied units.

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in low-income geographies is below, and in moderate-income geographies exceeds, the percentage of owner-occupied units in those geographies. The bank's percentage of home purchase loans in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is adequate. The percentage of home improvement loans originated in low-income geographies is significantly below and in moderate-income geographies approximates the percentage of owner-occupied units in those geographies. The bank's percentage of home improvement loans originated in low-income geographies is well below and in moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is adequate. The percentage of home refinance loans originated in low-income geographies is significantly below and in moderate-income geographies is near to the percentage of owner-occupied units in those geographies. The bank's percentage of home refinance loans originated in low-income geographies is near to and in moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the state of Indiana 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.

BHB's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies is near to the percentages of businesses located in those geographies. BHB's percentage of small loans to businesses originated or purchased in the low-income geographies is near to, and in moderate-income geographies exceeds, the aggregate percentage of reporting lenders.

Small Loans to Farms

Refer to Table 7 in the state of Indiana 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 farms.

BHB's geographic distribution of small loans to farms is adequate. The percentage of small loans to farms originated or purchased in low-income geographies exceeds both the percentage of small farms located in the low-income geographies and the aggregate percentage of all reporting lenders. BHB did not originate or purchase any farm loans in moderate-income geographies.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AAs and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the Indianapolis-Carmel-Anderson, IN MSA is good. The borrower distribution of home mortgage loans and small loans to businesses is good and small loans to farms is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

BHB's borrower distribution of home purchase and home improvement loans in the Indianapolis-Carmel-Anderson, IN MSA is excellent. The borrower distribution of home refinance loans is good. We placed more emphasis on the distribution to low-income borrowers as they represent a slightly higher percentage of families.

Home Purchase

BHB's borrower distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers approximates and for moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is excellent. The percentage of home improvement loans originated or purchased to low-income borrowers approximates and to moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home improvement loans originated or purchased to both low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below and for moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home refinance loans to both low- and moderate-income borrowers exceeds the aggregate percentage for all reporting lenders.

Small Loans to Businesses

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

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased is near to the percentage of small businesses in the AA and exceeds the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 12 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

The borrower distribution of small loans to farms is adequate. The percentage of small loans to farms originated or purchased is well below the percentage of small farms located in the AA but exceeds the aggregate percentage of all reporting lenders.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Indiana 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

CD lending has a positive impact on the lending test conclusion. BHB is a leader in making CD loans based on the combination of volume, responsiveness, and complexity. BHB made 34 CD loans totaling almost \$151.2 million, which represents 46.7 percent of allocated tier 1 capital. By dollar volume, 46.6 percent of these loans funded affordable housing, 34.0 percent funded economic development, 16.0 percent funded community service, and 3.4 percent funded revitalization.

Examples of CD loans in this AA include:

- BHB provided \$32.8 million in financing for a 258-unit apartment community where 75 percent of the units are priced at or below the affordable rent rate for the area.
- BHB provided financing to a small company in a moderate-income geography to fund its growth allowing the company to hire 35 additional workers.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 222 loans totaling \$25.8 million among the various flexible lending products available in the Indianapolis-Carmel-Anderson, IN MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Kokomo MSA and non-MSA Indiana AAs is not inconsistent with the bank's overall outstanding performance under the lending test in Indiana.

Refer to Tables 1 through 12 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Indiana is outstanding. Based on a full-scope review, the bank's performance in the state of Indiana is excellent.

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

BHB has an excellent level of qualified CD investment and grants. There are few licensed SBICs and CDFIs headquartered in the AA. The dollar amount of the qualified investments in the Indianapolis-Carmel-Anderson, IN MSA represents 13.09 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Indianapolis-Carmel-Anderson, IN MSA. BHB made 50 current- and prior-period qualified investments totaling

nearly \$41.8 million in this AA. Investments were responsive to community needs for affordable housing developments and included qualified investments in CDFIs and LIHTC funds that mainly supported affordable housing projects. BHB provided 62 grants and donations totaling almost \$613,300 that support affordable housing, financial education, and community services for low- and moderate-income individuals, families, and schools. In addition, BHB also has 23 qualified investments of nearly \$10.8 million that supported affordable housing and schools within the broader statewide or regional area and almost \$5.9 million in unfunded commitments in the AA.

Examples of qualified investments in this AA include:

- An investment of \$7.8 million in a LIHTC Fund that assists in developing, owning, and operating apartment complexes that have received allocations of federal low-income housing tax credits. This investment is to a senior living center that was adaptively rehabbed and now provides 60 units of affordable senior housing for individuals making less than 60 percent of the area median income.
- A \$5 million investment in a CDFI that provides CD loans and lines of credit to local small businesses to finance acquisition and pre-development costs for affordable housing, community facilities and services, economic development projects, and other projects and programs that revitalize and stabilize low- or moderate-income neighborhoods.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Kokomo, IN MSA and the non-MSA areas of Indiana is weaker than the bank's overall outstanding performance under the investment test in the state of Indiana due to lower volumes of qualified investments. The investment test performance in the limited-scope areas did not have a significant impact on the bank's overall investment test rating for the state of Indiana. Refer to Table 14 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the state of Indiana is high satisfactory. Based on the full-scope review, the bank's performance in the Indianapolis-Carmel-Anderson, IN MSA is good.

Retail Banking Services

Refer to Table 15 in the state of Indiana 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.

BHB's delivery systems are accessible to essentially all portions of the AA. The bank operates 38 branch offices in the Indianapolis-Carmel-Anderson, IN MSA. BHB has no branches

located in low-income geographies; however, a branch in a middle-income geography is serving an adjacent low-income geography. The bank's distribution of branches in moderate-income geographies exceeds the percentage of the population living within those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 39 ATMs in the AA, of which 37 are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in this AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

BHB is a leader of CD services in the Indianapolis-Carmel-Anderson, IN MSA. During the evaluation period, bank employees conducted 52 financial education events that were attended by 1,854 participants. These events included presentation of financial literacy information to over 700 attendees at various housing fairs and seminars sponsored by local non-profit organizations. Other events involved homeownership and homebuyer education to over 390 attendees at various neighborhood home fairs and workshops.

In addition, 21 bank employees served in a leadership role or as a volunteer for 20 different community organizations. These employees provided 1,932 hours of CD services through their participation on 14 boards, 10 committees, and three advisory groups. In addition, the employees provided 201 hours of volunteer service. Notable examples of BHB's CD services include:

- A senior officer serves as a board member for an organization whose focus is to increase affordable and sustainable housing in the Indianapolis, Indiana area.
- A bank employee serves as a board member for an organization that helps resident-led, community-based, development organizations transform distressed communities and neighborhoods into healthy ones.
- A bank manager serves as a board member of an organization that provides child-focused representation to low- and moderate-income children who have suffered abuse or neglect.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Kokomo, IN MSA is stronger than the bank's overall performance in the state of Indiana due to better branch distribution. The bank's performance in the non-MSA IN areas is weaker than the bank's overall performance in the state of Indiana due to poorer branch distribution. BHB's performance in these limited scope areas did not have a significant impact on the bank's overall service test performance rating for the state of Indiana. Refer to Table 15 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

State Rating

State of Kansas

CRA Rating for Kansas⁷: Outstanding

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors that support this rating include:

- BHB's overall distribution of loans by income level of geography is excellent and to borrowers of different income levels is good.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are readily accessible to all portions of the AA.

Description of Institution's Operations in Kansas

BHB has delineated one AA in the state of Kansas that includes only the non-MSA county of Crawford. The state rating does not include the counties that are in the Kansas City, MO-KS MSA as they were included in the multistate MSA analysis.

Based on June 30, 2016 FDIC summary of deposit information, BHB has \$41.3 million in deposits in this AA, which represents 0.05 percent of the bank's total deposits. The bank made 0.08 percent of its evaluation period lending in this AA.

BHB has a limited presence in the state with one office location, one stand-alone drive-up facility, and three deposit-taking ATMs within the AA. The bank ranks sixth in deposit market share with 5.42 percent. The top four competitors include The Girard National Bank with three branches and 24.34 percent of the market, Commerce Bank with two branches and 18.41 percent, Community National Bank & Trust with four branches and 15.49 percent, and Labette Bank with three branches and 11.14 percent. There are seven additional FDIC-insured depository institutions with eight offices within the bank's AA.

Refer to the market profiles for the state of Kansas in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

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

Scope of Evaluation in Kansas

We based our rating of the state of Kansas on the area that received a full-scope review. We conducted a full-scope review of the non-MSA Kansas AA, which is the only AA in the state that is not part of a multistate MSA. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Kansas is rated high satisfactory. Based on the full-scope review, the bank's performance in the non-MSA Kansas AA is good. We placed slightly more emphasis on home mortgage loans versus small loans to businesses. Among home mortgage loans, we placed slightly more emphasis on home purchase loans. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

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

BHB's lending activity reflects excellent responsiveness to area credit needs in the non-MSA Kansas AA when considering the bank's deposits and competition. BHB deposit market share of 5.42 percent ranked sixth out of 12 depository institutions (50 percent). For home purchase loans, BHB's market share of 2.16 percent ranked 13th out of 68 lenders (top 19 percent). For home refinance loans, BHB's market share of 1.80 percent ranked 13th out of 56 lenders (top 23 percent). For small loans to businesses, BHB ranked 12th out of 30 lenders (top 40 percent) with a market share of 1.69 percent. The bank did not originate enough home improvement or small loans to farms to conduct a meaningful analysis.

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the non-MSA Kansas AA is excellent. The geographic distribution of home mortgage loans and small loans to businesses is excellent. Our conclusions are based on the bank's performance in moderate-income geographies, as there are no low-income geographies in this AA.

Home Mortgage Loans

Refer to Tables 2 and 4 in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

BHB's geographic distribution of home purchase and home refinance loans in the non-MSA Kansas AA is excellent.

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in moderate-income geographies exceeds both the percentages of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is excellent. The percentage of home refinance loans originated or purchased in moderate-income geographies exceeds both the percentages of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the state of Kansas 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.

BHB's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in the moderate-income geographies exceeds both the percentage of businesses located in the moderate-income geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the non-MSA Kansas AA is good. The borrower distribution of home mortgage loans is adequate and small loans to businesses is excellent.

Home Mortgage Loans

Refer to Tables 8 and 10 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

BHB's borrower distribution of home purchase loans in the non-MSA Kansas AA is adequate and home refinance loans is good.

Home Purchase

The borrower distribution of home purchase loans is adequate. The bank made no loans to low-income borrowers. The percentage of home purchase loans originated or purchased to

moderate-income borrowers exceeds both the percentage of moderate-income families in the AA and the aggregate percentage of all reporting lenders.

Home Refinance

The borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below, and to moderate-income borrowers exceeds, the percentage of those families in the bank's AA. BHB's percentage of home refinance loans to both low- and moderate-income borrowers exceeds the aggregate percentage for all reporting lenders.

Small Loans to Businesses

Refer to Table 11 in the state of Kansas 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 borrower distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased approximates the percentage of small businesses in the AA and exceeds the aggregate percentage of all reporting lenders.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Kansas 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.

BHB did not originate any CD loans in the non-MSA Kansas AA. Due to the limited opportunities and staffing, this did not have a negative impact on the bank's overall lending test rating.

Product Innovation and Flexibility

BHB makes limited use of innovative and flexible lending programs in the non-MSA Kansas AA. This has a neutral impact on the lending test conclusion.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Kansas is outstanding. Based on a full-scope review, the bank's performance in the state of Kansas is excellent.

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

BHB has an excellent level of qualified CD investments and grants. There are no licensed SBIC nor CDFIs headquartered in the AA. The dollar amount of the qualified investments in non-MSA Kansas represents 30.79 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the non-MSA Kansas AA. BHB made four current-period qualified investments totaling more than \$1.7 million in this AA. Investments were responsive to community needs and included qualified investments in infrastructure improvements in moderate-income and underserved or distressed middle-income census tracts. BHB provided four grants totaling \$16,000 to support programs targeted to low- and moderate-income individuals such as food pantries, emergency assistance services, safe shelters and other community service programs in the AA. BHB also has four prior-period statewide or regional qualified investments with outstanding balances totaling \$775,000 that continue to benefit the AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the state of Kansas is outstanding. Based on the full-scope review, the bank's performance in the non-MSA Kansas AA is excellent.

Retail Banking Services

Refer to Table 15 in the state of Kansas 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.

BHB's delivery systems are readily accessible to essentially all portions of the AA. The bank operates one full-service branch and one stand-alone drive-up in the non-MSA Kansas AA, both located in a moderate-income geography. The branches are in Pittsburg, Kansas, which is the largest population center in the AA and attracts people from a 60 mile radius. There are no low-income geographies. The bank's distribution of branches in the moderate-income geographies exceeds the percentage of the population living within those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has three ATMs in the AA, all of which are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in this AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. BHB's branch office offers retail products and services, while the drive-up provides paying and receiving functions.

Community Development Services

BHB provides an adequate level of CD services in the non-MSA Kansas AA when taking into consideration branch resources. During the evaluation period, a bank employee conducted a seminar that provided a basic introduction to consumer banking for 50 attendees. The seminar was held during an event sponsored by an organization with a mission to promote career development for students and job-seekers with disabilities through hands on mentoring relationships.

State Rating

State of Missouri

CRA Rating for Missouri⁸: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- BHB's overall distribution of loans by income level of geographies is poor and to borrowers of different income levels is good.
- BHB has an excellent level of CD loans that are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are reasonably accessible to essentially all portions of the AA.

Description of Institution's Operations in Missouri

BHB has delineated a portion of the St. Joseph, MO-KS MMA as its AA in the state of Missouri. The state of Missouri rating does not include the counties that are in the Kansas City, MO-KS MMA or the St. Louis, MO-IL MMA as they were included in multistate MSA analysis.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$32.3 million in deposits in this AA, which represents 0.04 percent of the bank's total deposits. The bank made 0.08 percent of its evaluation period lending in this AA.

BHB has one office location and two ATMs, of which one is deposit-taking, within the AA. The bank ranks 10th in deposit market share with 1.83 percent. The top three competitors have 59.67 percent of the market and include The Nodaway Valley Bank with five branches and 24.34 percent, Commerce Bank with three branches and 22.42 percent, and U.S. Bank N.A. with five branches and 12.91 percent. There are 11 additional FDIC-insured depository institutions with 19 offices within the bank's AA.

Refer to the market profiles for the state of Missouri in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

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

Scope of Evaluation in Missouri

We based our rating of the state of Missouri on the area that received a full-scope review. We conducted a full-scope review of the St. Joseph, MO-KS MMA, which is the only AA in the state that is not part of a multistate MSA. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Missouri is rated high satisfactory. Based on full-scope reviews, the bank's performance in the St. Joseph, MO-KS MMA is good. We considered the bank's limited branch presence and staffing when reaching our conclusions. We placed more emphasis on home mortgage loans versus small loans to businesses. Among home mortgage loans, we placed the equal emphasis on home purchase loans and home refinance loans. BHB originated too few home improvement loans to conduct a meaningful analysis. The bank did not originate any small loans to farms in this AA. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

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

BHB's lending activity reflects good responsiveness to area credit needs in the St. Joseph, MO-KS MMA when considering the bank's deposits and competition. BHB deposit market share of 1.83 percent ranked 10th out of 15 depository institutions (top 67 percent). For home purchase loans, BHB's market share of 0.76 percent ranked 27th out of 124 lenders (top 22 percent). For home refinance loans, BHB's market share of 0.77 percent ranked 31st out of 122 lenders (top 25 percent). For small loans to businesses, BHB ranked 21st out of 43 lenders (top 49 percent) with a market share of 1.69 percent.

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the St. Joseph, MO-KS MMA is poor. The geographic distribution of home mortgage loans and small loans to businesses is poor. Our conclusions are based on the bank's performance in moderate-income geographies, as there are no low-income geographies in this AA.

Home Mortgage Loans

Refer to Tables 2 and 4 in the state of Missouri section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

BHB's geographic distribution of home purchase and home refinance loans in the St. Joseph, MO-KS MMA is poor.

Home Purchase

BHB's geographic distribution of home purchase loans is poor. The percentage of home purchase loans originated or purchased in moderate-income geographies is significantly below the percentages of owner-occupied housing units located in those geographies and below the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is very poor. The bank did not originate or purchase any home refinance loans in moderate-income geographies.

Small Loans to Businesses

Refer to Table 6 in the state of Missouri section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

BHB's geographic distribution of small loans to businesses is poor. The percentage of small loans to businesses originated or purchased in moderate-income geographies is well below both the percentages of businesses located in the moderate-income geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the St. Joseph, MO-KS MMA is good. The borrower distribution of both home mortgage loans and small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 8 and 10 in the state of Missouri 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.

BHB's borrower distribution of home purchase loans in the St. Joseph, MO-KS MMA is good and home refinance loans is adequate.

Home Purchase

BHB's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below, and for moderate-income borrowers exceeds, the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased to both low- and moderate-income borrowers exceeds the percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased to low-income borrowers is significantly below and for moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home refinance loans to low-income borrowers is well below and for moderate-income borrowers exceeds the aggregate percentage for all reporting lenders.

Small Loans to Businesses

Refer to Table 11 in the state of Missouri 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 borrower distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased is well below the percentage of small businesses in the AA and is below the aggregate percentage of reporting lenders. However, the bank did not have information available for 39.13 percent of small loans to businesses it originated or purchased in this AA. Therefore, we analyzed loans by original amount regardless of business size as a proxy. The percentage of loans originated or purchased for \$100,000 or less exceeds the percentage of small businesses in the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Missouri 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.

CD lending has a positive impact on the lending test conclusion as BHB has made a relatively high level of CD loans in the St. Joseph, MO-KS MMA considering its operations and AA profile. BHB made two CD loans totaling \$40.7 million, which represents 922.3 percent of allocated tier 1 capital. Both loans promoted economic development by supporting permanent job creation. For the larger of the two loans, BHB provided \$25.7 million of a \$350 million financing package to a food processing company located in a moderate-income geography to build a new production facility that created 212 permanent jobs.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made eight loans totaling \$907,000 among the various flexible lending products available in the St. Joseph, MO-KS MMA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Missouri is outstanding. Based on a full-scope review, the bank's performance in the state of Missouri is excellent.

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

BHB has an excellent level of qualified CD investments and grants. Investment opportunities are constrained in this AA as there are no CDFIs nor SBICs headquartered in the AA. The dollar amount of the qualified investments in the St. Joseph, MO-KS MMA represents 10.99 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the St. Joseph, MO-KS MMA in the state of Missouri. BHB has one prior-period qualified investments with an outstanding balance of \$455,800 in the AA that is still responsive to community needs. In addition, the bank made four grants and donations totaling \$20,000 to support non-profit organizations that provide community services to low- and moderate-income individuals and families such as providing school supplies, emergency housing programs, and other programs designed to lessen the impact of poverty. BHB also made three qualified investments of \$69,000 that provided below-market financing for nonprofit businesses within the broader statewide or regional area that included the bank's AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in the state of Missouri is low satisfactory. Based on the full-scope review, the bank's performance in the St. Joseph, MO-KS MMA is adequate.

Retail Banking Services

Refer to Table 15 in the state of Missouri 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.

BHB's delivery systems are reasonably accessible to essentially all portions of the AA. The bank has only one branch, which is located in a middle-income geography. There are no low-income geographies and only 14.46 percent of the population resides in the moderate-income geographies. The branch is located in the city of St. Joseph, which is the county seat of Buchanan County and the central service provider for the area.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has two ATMs in the

AA, one of which is deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in this AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. BHB's branch office offers traditional retail products and services, with regional lenders available to serve commercial and business customers.

Community Development Services

BHB provides an adequate level of CD services in the St. Joseph, MO-KS MMA when taking into consideration branch resources. During the evaluation period, bank employees hosted BMO Fun Family Finance Day. Invitations to this event were sent to local non-profit organizations and schools that serve predominately low- and moderate-income individuals. The event included basic financial education for the 25 students in attendance.

State Rating

State of Washington

CRA Rating for Washington: Outstanding

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: Low Satisfactory

The major factors that support this rating include:

- BHB's overall distribution of home loans by income level of geography and to borrowers of different income levels is good.
- BHB has an excellent level of CD loans that are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are reasonably accessible to essentially all portions of the AA.

Description of Institution's Operations in Washington

BHB has delineated a portion of the Seattle-Bellevue-Everett, WA MD as its AA in the state of Washington.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$4.4 million in deposits in this MD, which represents 0.01 percent of the bank's total deposits. The bank made 0.29 percent of its loans during the evaluation period in this AA.

BHB has one office location and no ATMs within the AA. The office is located on the 20th floor of an office building. While it is identified as a full-service brick and mortar office by the FDIC, the focus of the office is on wealth management and not typical retail products and services. The fulfillment of all retail deposit and lending product offerings is completed by mail in either Phoenix, AZ or Chicago, IL. We considered this when determining our performance conclusions.

The bank ranks 44th in deposit market share with 0.01 percent. The top four competitors include Bank of America N.A. with 89 branches and 29.01 percent market share, Wells Fargo Bank, N.A. with 66 branches and 13.80 percent, JPMorgan Chase Bank, N.A. with 86 branches and 11.87 percent, and U.S. Bank N.A. with 56 branches and 11.77 percent. There are 42 additional FDIC-insured depository institutions with 246 offices within the bank's AA.

Refer to the market profiles for the state of Washington in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for the AA that received a full-scope review.

Scope of Evaluation in Washington

We based our rating of the state of Washington on the area that received a full-scope review. We conducted a full-scope review of the Seattle-Bellevue-Everett, WA MD, which is the only AA in the state. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Washington is rated outstanding. Based on the full-scope review, the bank's performance in the Seattle-Bellevue-Everett, WA MD AA is excellent. We placed more emphasis on small loans to businesses than home mortgage. BHB did not originate enough home improvement loans or small loans to farms to conduct a meaningful analysis. Refer to Scope of Evaluation section for details on how weightings were determined.

Lending Activity

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

BHB's lending activity reflects good responsiveness to area credit needs in the Seattle-Bellevue-Everett, WA MD when considering the bank's deposits and competition. BHB is ranked 44th out of 47 depository institutions (bottom six percent) with a deposit market share of 0.01 percent. For home purchase loans, BHB's market share of 0.01 percent ranked 222nd out of 413 lenders (bottom 46 percent). For home refinance loans, BHB's market share of 0.01 percent is ranked 245th out of 439 lenders (bottom 44 percent). For small loans to businesses, BHB's market share of 0.01 is ranked 60th out of 102 lenders (bottom 41 percent).

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in the Seattle-Bellevue-Everett, WA MD is good. The geographic distribution of home mortgage loans is excellent and small loans to businesses is good. We placed more emphasis on the bank's performance in moderate-income geographies as these areas have a higher percentage of owner-occupied housing units.

Home Mortgage Loans

Refer to Tables 2 and 4 in the state of Washington 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.

BHB's geographic distribution of home purchase and home refinance loans in the Seattle-Bellevue-Everett, WA MD is excellent.

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in those geographies and exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is excellent. The percentage of home refinance loans originated or purchased in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in those geographies and exceeds the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table 6 in the state of Washington 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.

BHB's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in low-income geographies exceeds and in moderate-income geographies is below the percentage of businesses located in those geographies. The bank's percentage of small loans to businesses originated in low-income geographies exceeds and in moderate-income geographies is below the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AA and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in the Seattle-Bellevue-Everett, WA MD is good. The borrower distribution of home mortgage loans is excellent and small loans to businesses is adequate.

Home Mortgage Loans

Refer to Tables 8 and 10 in the state of Washington 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.

BHB's borrower distribution of home purchase loans in the Seattle-Bellevue-Everett, WA MD is good and home refinance loans is excellent.

Home Purchase

BHB's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below and for moderate-income borrowers is near to the percentage of those families in the AA. BHB's percentage of home purchase loans originated or purchased by low-income borrowers exceeds and for moderate-income borrowers is near to the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is excellent. The percentage of home refinance loans originated or purchased to low-income borrowers approximates and for moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home refinance loans to both low- and moderate-income borrowers exceeds the aggregate percentage for all reporting lenders.

Small Loans to Businesses

Refer to Table 11 in the state of Washington 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 borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is significantly below the percentage of small businesses in the AA and is significantly below the aggregate percentage of all reporting lenders. However, the bank did not obtain revenue information for 94.61 percent of the small loans to businesses it originated or purchased in this AA. Therefore, we analyzed loans by original amount regardless of business size as a proxy. The percentage of loans originated or purchased for \$100,000 or less is near to the percentage of small businesses in the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Washington 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.

CD lending has a positive impact on the lending test conclusion as BHB has made a relatively high level of CD loans taking into consideration the bank's operations and market presence in the state of Washington. BHB made four CD loans totaling \$4.3 million, which represents 711.6 percent of allocated tier 1 capital. All four loans were for affordable housing that provided a total of 57 units. The largest loan was for \$1.4 million for a 16-unit affordable housing apartment project.

Product Innovation and Flexibility

BHB makes limited use of innovative and flexible lending programs in this AA. This has a neutral impact on the lending test conclusion.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Washington is outstanding. Based on a full-scope review, the bank's performance in the state of Washington is excellent.

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

BHB has an excellent level of qualified CD investment and grants. BHB has a very limited presence in this AA. There are several CDFIs, but no SBICs in the AA. The dollar amount of the qualified investments in the Seattle-Bellevue-Everett, WA MD represents 140.09 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Seattle-Bellevue-Everett, WA MD. BHB made six current- and prior-period qualified investments totaling more than \$838,500 in this AA. Investments were responsive to community needs and included qualified investments in CDFIs to promote affordable housing. For example, the bank made an investment of \$100,000 in a CDFI that promotes affordable homeownership opportunities through three key interrelated program areas: CD, homebuyer services, and real estate development. In addition, BHB made five grants and donations totaling \$6,000 to organizations that provide community services to low- and moderate-income individuals.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Washington is low satisfactory. Based on the full-scope review, the bank's performance in the Seattle-Bellevue-Everett, WA MD is adequate considering the wealth management focus of this location.

Retail Banking Services

Refer to Table 15 in the state of Washington 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.

BHB's delivery systems are reasonably accessible to essentially all portions of the AA. The bank has only one branch and no ATMs located in this AA. The branch is located in an office building in a middle-income geography. This is reasonable considering the location is not providing typical retail services.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in this AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. This BHB location offers traditional wealth management products and services. All retail deposit and lending services are available as well, but are fulfilled by mail in either Phoenix, Ariz. or Chicago, Ill.

Community Development Services

BHB provides a relatively high level of CD services in the Seattle-Bellevue-Everett, WA MD given the office's business focus and limited staff. During the evaluation period, a bank employee taught finance to 45 children the as part of the bank-wide event 'Talk with Our Kids about Money Day'.

In addition, three bank employees served in leadership roles for three different organizations. These employees provided 192 hours of CD services through their participation on three boards and two committees. Notable examples of BHB's CD services include:

- A bank manager serves on the board of an organization that provides residential services to individuals with disabilities, the majority of which are low- or moderate-income.
- A bank manager serves on the board of an organization whose mission is to provide educational programs for homeless children and housing services low- and moderate-income families experiencing trauma.

State Rating

State of Wisconsin

CRA Rating for Wisconsin⁹: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors that support this rating include:

- BHB's overall distribution of loans by income level of geography and to borrowers of different income levels is good.
- BHB has an excellent level of CD loans that demonstrate leadership and complexity and are responsive to CD needs, which has a positive impact on the lending test conclusion.
- BHB has an excellent level of qualified CD investments and grants that are responsive to CD needs.
- BHB's delivery systems are readily accessible to all portions of the AAs.

Description of Institution's Operations in Wisconsin

BHB has delineated 14 AAs in the state of Wisconsin. They include the entirety of the Milwaukee-Waukesha-West Allis, WI; Appleton, WI; Eau Claire, WI; Fond du Lac, WI; Green Bay, WI; Janesville-Beloit, WI; Oshkosh-Neenah, WI; Racine, WI; Sheboygan, WI; and Wausau, WI MSAs; portions of the Duluth, MN-WI and La Crosse, WI-MN MMAs; and the Madison MSA. The non-MSA counties of Adams, Ashland, Clark, Dodge, Dunn, Grant, Jefferson, Juneau, Langlade, Lincoln, Manitowoc, Marinette, Marquette, Oneida, Portage, Richland, Sauk, Shawano, Vernon, Vilas, Walworth, Waupaca, Waushara, and Wood are combined as one AA. The state of Wisconsin rating does not include the counties in the Minneapolis-St. Paul-Bloomington, MN-WI MMA and Lake County-Kenosha County, IL-WI MD that are included in multistate MSAs.

Based on June 30, 2016 FDIC summary of deposit information, BHB has just over \$17.8 billion in deposits in these AAs, which represents 21.72 percent of the bank's total deposits. The bank made 38.95 percent of its evaluation period lending in these AAs.

BHB has 198 office locations and 497 ATMs, of which 205 are deposit-taking, within the state. The bank ranks second in deposit market share with 13.68 percent. Primary competitors include U.S. Bank N.A. with 120 branches and 22.38 percent market share, Associated Bank, N.A. with 145 branches and 9.95 percent, and JPMorgan Chase Bank, N.A. with 69 branches

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

and 6.76 percent. There are 219 additional FDIC-insured depository institutions with 1,272 offices within the bank's AAs.

Refer to the market profiles for the state of Wisconsin in appendix C for detailed demographics and other performance context information, including identified AA needs and opportunities, for AAs that received full-scope reviews.

Scope of Evaluation in Wisconsin

Since the state of Wisconsin is BHB's second largest market, we selected three AAs for full-scope reviews. A full-scope review was completed in the Milwaukee-Waukesha-West Allis, WI MSA, as it was the AA with the largest percentage of deposits in the state at 49.78 percent and BHB's market share ranked them second out of 51 depository institutions. The Madison, WI MSA received a full-scope review as it has the second largest percentage of deposits at 14.73 percent and BHB was the depository institution with the largest deposit market share. The Wausau, WI MSA was selected as the third full-scope review area because BHB is the number one depository institution in the market with few competitors and this AA is in the northern part of the state that is less populous. Limited scope reviews were completed in the Appleton, WI; Duluth, MN-WI; Eau Claire, WI; Fond du Lac, WI; Green Bay, WI, Janesville-Beloit, WI; La Crosse, WI; Oshkosh-Neenah, WI; Racine, WI; and Sheboygan, WI MSAs; and the non-MSA WI areas. Refer to the table in appendix A for more information.

We based our ratings primarily on results of those areas that received full-scope reviews. The Milwaukee-Waukesha-West Allis, WI MSA was the most heavily weighted when arriving at the overall conclusion for the state of Wisconsin.

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 outstanding. Based on full-scope reviews, the bank's performance in the Milwaukee-Waukesha-West Allis, WI MSA; Madison, WI MSA; and Wausau, WI MSA is excellent. We placed more emphasis on small loans to businesses versus home mortgage loans. We placed more weight on home refinance loans as the bank originated more home refinance loans than the other home mortgage product types in the three full scope areas of review. Refer to Scope of Evaluation section for details on how weightings were determined.

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.

Milwaukee-Waukesha-West Allis, WI MSA

BHB's lending activity reflects excellent responsiveness to area credit needs in the Milwaukee-Waukesha-West Allis, WI MSA. BHB's deposit market share for the Milwaukee-Waukesha-West Allis, WI MSA is 13.76 percent and the bank is ranked second out of 51 depository institutions (top 2 percent). For home purchase loans, BHB's market share of 2.44 percent ranks ninth out of the 378 lenders (top 2 percent). For home improvement loans, BHB's market share of 1.13 percent ranks 22nd out of 136 lenders (top 16 percent). For home refinance loans, BHB's market share of 4.50 percent ranks third out of 363 lenders (top 1 percent). BHB's market share for small loans to business is 7.62 percent and ranks fifth out of 105 lenders (top 5 percent). The small business loan market is dominated by four nationwide lenders with large business credit card portfolios that together own almost 60 percent of the small loans to businesses.

Madison, WI MSA

BHB's lending activity reflects excellent responsiveness to area credit needs in the Madison, WI MSA. BHB's deposit market share for the Madison, WI MSA is 15.73 percent and the bank is ranked first out of 48 deposit-taking entities (top 2 percent). For home purchase loans, BHB's market share of 1.19 percent ranks 12th out of 312 lenders (top 4 percent). For home improvement loans, BHB's market share of 0.54 percent ranks 31st out of 94 lenders (top 33 percent). For home refinance loans, BHB's market share of 2.66 percent ranks eighth out of the 282 lenders (top 3 percent). BHB's market share for small loans to business is 7.40 percent and ranks fifth out of 71 lenders (top 10 percent). The small business loan market is dominated by two nationwide lenders with large business credit card portfolios that have close to 50 percent of the small loans to business market.

Wausau, WI MSA

BHB's lending activity reflects excellent responsiveness to area credit needs in the Wausau, WI MSA. BHB's deposit market share for the Wausau, WI MSA is 21.65 percent and the bank is ranked first out of 22 depository institutions (top 5 percent). For home purchase loans, BHB's market share of 4.15 percent ranks eighth out of 133 lenders (top 6 percent). For home improvement loans, BHB's market share of 0.26 percent ranks 41st out of 43 lenders (bottom 5 percent). For home refinance loans, BHB's market share of 5.16 percent ranks third out of 139 lenders (top 2 percent). BHB's market share for small loans to business is 6.03 percent and ranks fifth out of 44 lenders (top 11 percent). Three of the top four lenders in market are nationwide lenders with large business credit card portfolios and have 50 percent of the small loans to businesses market.

Distribution of Loans by Income Level of the Geography

BHB's overall distribution of loans by income level of geography in Wisconsin is good. The geographical distribution of home mortgage loans in the Milwaukee-Waukesha-West Allis, WI MSA is good. The geographical distribution of home mortgage loans in the Madison, WI MSA is adequate. The geographical distribution of home mortgage loans in the Wausau, WI MSA is excellent. The geographical distribution of small loans to businesses and farms in the Milwaukee-Waukesha-West Allis, WI MSA and the Wausau, WI MSA is good. In the Madison, WI MSA, the geographical distribution of small loans to businesses is excellent and small loans to farms is good.

In the Wausau, WI MSA, our conclusions are based on the bank's performance in moderate-income geographies, as there are no low-income geographies in this AA.

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.

BHB's geographical distribution of home purchase loans in the Milwaukee-Waukesha-West Allis, WI MSA and the Wausau, WI MSA is excellent and in the Madison, WI MSA is good. The geographical distribution of home improvement loans in the Milwaukee-Waukesha-West Allis, WI MSA is good, in the Madison, WI MSA is adequate, and in the Wausau, WI MSA is excellent. The geographical distribution of home refinance loans in the Milwaukee-Waukesha-West Allis, WI MSA and the Madison, WI MSA is adequate and in the Wausau, WI MSA is excellent. We placed more emphasis on the bank's performance in moderate-income geographies as these areas have a higher percentage of owner-occupied units

Milwaukee-Waukesha-West Allis, WI MSA

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in low-income geographies is near to and in moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies. BHB's percentage of home purchase loans originated or purchased in both low- and moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased in low-income geographies is near to and in moderate-income geographies is below the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home improvement loans originated or purchased in low-income geographies exceeds and in the moderate-income geographies is near to the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased in low-income geographies is significantly below and in moderate-income geographies is well below the percentage of owner-occupied housing units in those geographies. BHB's percentage of home refinance originated or purchased in low-income geographies is near to, and in moderate-income geographies exceeds, the aggregate percentage of all reporting lenders.

Madison, WI MSA

Home Purchase

BHB's geographic distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied housing units in those geographies. BHB's percentage of home purchase loans originated or purchased in low-income geographies exceeds and in moderate-income geographies is near to the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is adequate. The bank did not originate or purchase any home improvement loans in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies and exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased in low-income geographies is significantly below and in moderate-income geographies approximates the percentage of owner-occupied housing units located in those geographies. BHB's percentage of home refinance loans originated or purchased in low-income geographies is below and in moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Wausau, WI MSA

Home Purchase

BHB's geographic distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units and exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's geographic distribution of home improvement loans is excellent. The percentage of home improvement loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units and exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's geographic distribution of home refinance loans is excellent. The percentage of home refinance loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units and exceeds the aggregate percentage of all reporting lenders.

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 or purchase of small loans to businesses.

Milwaukee-Waukesha-West Allis, WI MSA

BHB's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in low- and moderate-income geographies is near to the percentage of businesses located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Madison, WI MSA

BHB's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeds the percentage of businesses located in those geographies. BHB's percentage of small loans to businesses in both low- and moderate-income areas exceeds the aggregate percentage of all reporting lenders.

Wausau, WI MSA

BHB's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in moderate-income geographies is below the percentage of businesses located in those geographies and exceeds the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 7 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 or purchase of small loans to farms.

Milwaukee-Waukesha-West Allis, WI MSA

BHB's geographic distribution of small loans to farms is poor. BHB did not originate or purchase any loans in either low- or moderate-income geographies. However, only 10 percent of farms are located in these geographies and farm loans are not a primary product of BHB as agricultural lending represents approximately 2 percent of the bank's overall lending portfolio.

Madison, WI MSA

BHB's geographic distribution of small loans to farms is good. The percentage of small loans to farms originated or purchased in low-income geographies exceeds and in moderate-income geographies is below the percentage of small farms located in those geographies. There is no aggregate lending data for low-income geographies as only 0.28 percent of farms are located in these geographies. BHB's percentage of small loans to farms in moderate-income geographies exceeds the aggregate percentage of all reporting lenders.

Wausau, WI MSA

BHB's geographic distribution of small loans to farms is good. The percentage of small loans to farms originated or purchased in moderate-income geographies is below the percentage of small farms in moderate-income geographies, but exceeds the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We analyzed BHB's geographic lending patterns throughout the AAs and did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

BHB's overall distribution of loans to borrowers of different income levels in Wisconsin is good. The borrower distribution of home mortgage loans and small loans to businesses in the Milwaukee-Waukesha-West Allis, WI MSA; the Madison, WI MSA and the Wausau, WI MSA is good. The borrower distribution of small loans to farms in the Milwaukee-Waukesha-West Allis, WI MSA and the Madison, WI MSA is adequate and in the Wausau, WI MSA is good.

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.

BHB's borrower distribution of home purchase loans in the Milwaukee-Waukesha-West Allis, WI MSA and the Wausau, WI MSA is excellent and in the Madison, WI MSA is adequate. The borrower distribution of home improvement loans in Milwaukee-Waukesha-West Allis, WI MSA; the Madison, WI MSA; and the Wausau, WI MSA is good. The borrower distribution of home refinance loans in the Milwaukee-Waukesha-West Allis, WI MSA; the Madison, WI MSA; and the Wausau, WI MSA is good. We considered housing costs in relation to the median family incomes in the AAs, which limits the affordability for low- and moderate-income families.

Milwaukee-Waukesha-West Allis, WI MSA

Home Purchase

BHB's borrower distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers near to and to moderate-income borrowers exceeds the percentage of those families located in the AA. BHB's percentage of home purchase loans originated or purchased to low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers is below and to moderate-income borrowers is near to the percentage of those families located in the AA. BHB's percentage of home improvement loans originated or purchased to low-income borrowers exceeds and to moderate-income borrowers is below the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of those families located in the AA. BHB's percentage of home improvement loans originated or purchased by low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Madison, WI MSA

Home Purchase

BHB's borrower distribution of home purchase loans is good. The percentage of home purchased loans originated or purchased to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of those families located in the AA. BHB's percentage of home purchased loans originated or purchased to low- and moderate-income borrowers is below the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution for home improvement is good. The percentage of home improvement loans originated or purchased to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home improvement loans originated or purchased to low- and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution for home refinance is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of low- and moderate-income families located in the AA. BHB's percentage of home refinance loans originated or purchased to low-income borrowers exceeds and to moderate-income borrowers is near to the aggregate percentage of all reporting lenders.

Wausau, WI MSA

Home Purchase

BHB's borrower distribution for home purchase loans is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers is near to and to moderate-income borrowers exceeds the percentage of those families located in the AA. BHB's percentage of home purchase loans originated or purchased to low-income borrowers exceeds and to moderate-income borrowers is near to the aggregate percentage of all reporting lenders.

Home Improvement

BHB's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers exceeds and to moderate-income borrowers is well below the percentage of those families located in the AA. BHB's percentage of home improvement loans originated or purchased to low-income borrowers exceeds and to moderate-income borrowers is well below the aggregate percentage of all reporting lenders.

Home Refinance

BHB's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of those families in the AA. BHB's percentage of home refinance loans originated or purchased to low-income borrowers is below and moderate-income borrowers exceeds the aggregate percentage of all reporting lenders.

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.

Milwaukee-Waukesha-West Allis, WI MSA

The borrower distribution of small loans to businesses is good. BHB's borrower distribution of small loans to businesses originated or purchased is below the percentage of small businesses in the AA, but exceeds the aggregate percentage of all reporting lenders.

Madison, WI MSA

The borrower distribution of small loans to businesses is good. BHB's borrower distribution of small loans to businesses originated or purchased is below the percentage of small businesses in the AA, but exceeds the aggregate percentage of all reporting lenders.

Wausau, WI MSA

The borrower distribution of small loans to businesses is good. BHB's borrower distribution of small loans to businesses originated or purchased is near to the percentage of small businesses in the AA and exceeds the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 12 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Milwaukee-Waukesha-West Allis, WI MSA

The borrower distribution of small loans to farms is adequate. BHB's borrower distribution of small loans to farms originated or purchased is well below the percentage of small farms in the AA, but exceeds the aggregate percentage of all reporting lenders.

Madison, WI MSA

The borrower distribution of small loans to farms is adequate. The percentage of small loans to farms originated or purchased is well below the percentage of small farms located in the AA, but exceeds the aggregate percentage of all reporting lenders.

Wausau, WI MSA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms originated or purchased to farms is near to the percentage of small farms located in the AA, but exceeds the aggregate percentage of all reporting lenders.

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.

CD lending has a positive impact on the lending test conclusion in the state of Wisconsin. The level of CD lending in the Milwaukee-Waukesha-West Allis, WI MSA; Madison, WI MSA; and Wausau, WI MSA is excellent.

Milwaukee-Waukesha-West Allis, WI MSA

BHB is a leader in making CD loans in the Milwaukee-Waukesha-West Allis, WI MSA based on the combination of volume, responsiveness, and complexity. The bank originated 123 CD loans totaling \$352 million, which represents 29.03 percent of allocated tier 1 capital. By dollar volume, 29.9 percent of these loans funded community services, 24.9 percent funded economic development, 21.7 percent funded affordable housing, 15.3 percent funded revitalization and stabilization, and 8.0 percent funded job creation.

Examples of CD loans in this AA include:

- BHB provided funding of \$8.2 million for the construction of a new community-based health and educational services center in a low-income geography. The center will provide comprehensive community-based programs targeted to low- and moderate-income children and families.
- BHB provided a \$6.5 million loan for the rehabilitation and construction of affordable housing in the Sherman Park neighborhood. The project created 40 units of affordable housing in a combination of 20 renovated/rehabbed foreclosed single-family homes, three two-unit duplexes, one four-unit building, and new construction of 10 single-family homes. The project targeted families earning less than 60 percent of the area median income.
- BHB provided a \$6.4 million loan to fund the construction of a project comprised of 40 units of affordable housing consisting of 30 closely scattered affordable single family and five affordable duplex homes in the Century City neighborhood. The units are targeted to families earning between 30 and 60 percent of the area median income.

Madison, WI MSA

BHB is a leader in making CD loans in the Madison, WI MSA based on the combination of volume, responsiveness, and complexity. The bank originated 28 CD loans totaling \$133 million, which represents 37.0 percent of allocated tier 1 capital. By dollar volume, 79.3 percent of these loans funded affordable housing, 19.3 percent funded economic development, and 1.2 percent funded community service.

For example, BHB provided \$9.5 million in loans to build 70 apartments and one commercial space in Madison. While located in a middle-income geography, 61 of the units are to be available for residents earning between 30 and 60 percent of the area median family income. The commercial space will be occupied by a not-for-profit affordable housing developer and supportive services provider for people with disabilities.

Wausau, WI MSA

BHB is a leader in making CD loans in the Wausau, WI MSA based on the combination of volume, responsiveness, and complexity. The bank originated six CD loans totaling \$10 million, which represented 11.0 percent of allocated tier 1 capital. All the CD loans funded affordable housing projects.

For example, BHB provided a \$4.6 million loan to fund construction and adaptation of a two-story elementary school building into 36 apartments. There will be 33 low-income housing tax credit units and three market rate units. The apartments will provide affordable housing for low- and moderate-incomes families and supportive housing to low-income veterans.

Product Innovation and Flexibility

BHB uses innovative and flexible lending programs in order to serve AA credit needs. During the evaluation period, BHB made 508 loans totaling \$50.8 million among the various flexible lending products available in the Milwaukee-Waukesha-West Allis, WI MSA, 66 loans totaling

\$11.7 million in the Madison, WI MSA, and 59 loans totaling 5.7 million in the Wausau, WI MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Appleton, WI MSA; Green Bay, WI MSA; Janesville, WI MSA; Sheboygan, WI MSA; and Wisconsin non-MSA AAs is not inconsistent with the bank's overall outstanding performance under the lending test in Wisconsin. In the Duluth, MN-WI MSA; Eau Claire, WI MSA; Fond du Lac, WI MSA; LaCrosse WI, MN-WI MSA; Oshkosh-Neenah, WI MSA; and the Racine, WI MSA the bank's performance is weaker than the bank's overall performance in the state. For Duluth, MN-WI MSA and Eau Claire, WI MSA this is due to the lack of CD in those AAs. For the Fond du Lac, WI MSA; LaCrosse, WI, MN-WI MSA; Oshkosh-Neenah, WI MSA; and Racine, WI MSA the geographical distribution for home mortgage is weaker. The bank's performance in these limited-scope areas did not have a significant impact on the bank's overall lending test performance rating for the state of Wisconsin.

Refer to Tables 1 through 12 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

The bank's performance under the investment test in the state of Wisconsin is outstanding. Based on full-scope reviews, the bank's performance in the Milwaukee-Waukesha-West Allis, WI MSA and the Madison, WI MSA is excellent. Performance in the Wausau, WI MSA is adequate.

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.

Milwaukee-Waukesha-West Allis, WI MSA

BHB has an excellent level of qualified CD investment and grants, often in leadership positions, particularly those that are not routinely provided by private investors. There are 11 CDFIs in the AA, but no Milwaukee-based SBICs. The dollar amount of the qualified investments in the Milwaukee-Waukesha-West Allis, WI MSA represents 7.95 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Milwaukee-Waukesha-West Allis, WI MSA. BHB made 39 current- and prior-period qualified investments totaling more than \$91.2 million in this AA. Investments were made in CDFIs, LIHTC funds, and various small business funds. Investments help once blighted neighborhoods to revitalize and redevelop many vacant buildings into affordable housing units. BHB made 251 grants and donations totaling over \$5.2 million to local non-profit organizations that promote economic development and revitalization in low- and moderate-income communities and support affordable housing development, financial education, and community services to low- and

moderate-income individuals. BHB also has almost \$21.2 million in 18 unfunded commitments in this AA.

Examples of qualified investments in this AA include:

- An investment of \$7.8 million in a LIHTC fund that rehabbed a historic building to provide 55 units of housing for families in a low-income geography. Of the 55 units, 87 percent of them were for workforce housing reserved for lower-income residents.
- An investment of \$1.4 million in a CDFI that exclusively serves nonprofit corporations in the Midwest including Milwaukee. These nonprofits provide services that address a wide range of needs including affordable housing and community services for low- and moderate-income individuals and families.
- An investment of more than \$11 million in a mortgage-backed security secured by an apartment building in which 62 percent of the units are rent restricted for residents at or below 60 percent of the area median income.

Madison, WI MSA

BHB has an excellent level of qualified CD investment and grants, often in leadership positions. There are no SBICs headquartered in this market and only a few CDFIs. The dollar amount of the qualified investments in the Madison, WI MSA represents 6.32 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an excellent level of responsiveness to the CD needs in the Madison, WI MSA. In this AA, they made 13 current- and prior-period qualified investments totaling nearly \$22.0 million. Several of these qualified investments were designed to provide affordable housing and provide units designated specifically for low- and moderate-income persons. The apartment complexes received an allocation of federal LIHTCs and offered new units of affordable housing in the AA. BHB made 65 grants and donations totaling over \$722,200 to CDFIs that support initiatives to reduce racial, social, and economic disparities across Wisconsin including Madison. BHB also has over \$9.5 million in six unfunded commitments in this AA.

Examples of qualified investments in this AA include:

- A \$7.0 million investment in a LIHTC to support an apartment complex with 72 units of family housing. Sixty-one of the units are set aside for families with household incomes up to 60 percent of the area median income. The remaining 11 units are available at market rents for households earning up to 80 percent of the area median income.
- Ten grants and sponsorships totaling \$420,000 to an organization that collaborates with numerous local agencies to bring about lasting change in the community and in low- and moderate-income peoples' lives by focusing on education, income, and health.

Wausau, WI MSA

BHB has an adequate level of qualified CD investment and grants, often in leadership positions. There are no certified CDFIs or licensed SBICs headquartered in this AA. The dollar amount of the qualified investments in the Wausau, WI MSA represents 3.75 percent of the allocated portion of the bank's tier 1 capital.

BHB exhibits an adequate level of responsiveness to the CD needs in the Wausau, WI MSA. In this AA, they made two current-period qualified investments totaling \$3.3 million dollars to support affordable housing in the form of LIHTC funds. There were no prior-period qualified investments still outstanding in this AA. BHB also made 19 grants and donations to organizations that provide community services to predominately low- and moderate-income individuals totaling \$141,300.

An example of an investment in this AA is a \$2.0 million LIHTC that will provide for 36 affordable housing units for rural families. Eighteen of the units will be in a rehabbed historic building and 18 will be in newly constructed townhomes.

Greater Statewide or Regional Area

BHB also has 29 qualified investments for over \$12.9 million benefiting the greater statewide or regional area. The majority of these were bonds to renovate and enhance the mechanical infrastructure of school buildings in rural school districts where the majority of students participated in the free or reduced lunch program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Appleton, WI MSA; Fond du Lac, WI MSA; Janesville-Beloit, WI MSA; Oshkosh-Neenah, WI MSA; Racine, WI MSA; and non-MSA AAs were not inconsistent with the overall outstanding investment test rating in the state of Wisconsin. In the Duluth, MN-WI MSA; Eau Claire, WI MSA; Green Bay, WI MSA; La Crosse, WI-MN MSA; and Sheboygan, WI MSAs, the bank's performance was weaker than the bank's overall outstanding performance under the investment test in the state due to lower volumes of qualified investments. The investment test performance in the limited-scope areas did not have a significant impact on the bank's overall investment test rating for the state of Wisconsin. Refer to Table 14 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Wisconsin is outstanding. Based on the full-scope reviews, the bank's performance in the Milwaukee-Waukesha-West Allis, WI; Madison, WI, and the Wausau, WI MSAs is excellent.

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.

Milwaukee-Waukesha-West Allis, WI MSA

BHB's delivery systems are readily accessible to all portions of the AA. The bank operates 71 branch offices in the Milwaukee-Waukesha-West Allis, WI MSA. The bank's distribution of branches in low-income geographies is below the percentage of the population living within those geographies. In moderate-income geographies, the bank's distribution of branches approximates the percentage of the population living within those geographies. When considering the three adjacent-serving branches that serve low-income geographies and the four adjacent-serving branches that serve moderate-income geographies within the AA, the distribution exceeds the percentage of population in both low and moderate-income geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 205 ATMs in the AA, of which 71 are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, BHB closed one branch located in a middle-income geography.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Madison, WI MSA

BHB's delivery systems are readily accessible to all portions of the AA. The bank operates 22 branch offices in the Madison, WI MSA. None of the branches are located in low-income geographies, but a branch in an adjacent middle-income geography is serving a low-income area. Considering the adjacent-serving branch, the distribution of branches in low-income geographies is near to the percentage of the population living within those geographies. In moderate-income geographies, the bank's distribution of branches exceeds the percentage of the population living within those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 75 ATMs in the AA, of which 27 are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, BHB closed one branch located in a moderate-income geography.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Wausau, WI MSA

BHB's delivery systems are readily accessible to all portions of the AA. The bank operates eight branch offices in the Wausau, WI MSA. There are no low-income geographies and the bank's distribution of branches in the moderate-income geographies exceeds the percentage of the population living in those geographies.

BHB makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. BHB has 11 ATMs in the AA, of which seven are deposit-taking. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. BHB did not open or close any branches in this AA during the evaluation period.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income individuals or low- or moderate-income geographies. BHB maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

Milwaukee-Waukesha-West Allis, WI MSA

BHB is a leader in providing CD services in the Milwaukee-Waukesha-West Allis, WI MSA. During the evaluation period, bank employees conducted 288 financial education events that were attended by 6,856 participants. These events provided information regarding basic financial matters, affordable housing, or foreclosure prevention. For example, BHB employees provided basic financial education to 1,331 students as part of the financial literacy curriculum offered by a local non-profit organization. Employees taught financial education classes to 214 low- and moderate-income individuals who were residents of a residential rehabilitation center for substance abuse and addiction. BHB employees presented 'Steps to Homeownership' at several housing workshops with a total of 259 attendees and information on foreclosure prevention to 298 attendees at home loan assistance events.

In addition, 38 employees served 36 different community organizations. These employees provided 2,880 hours of CD services to 43 boards, 32 committees, and five advisory groups.

The employees also provided 67 hours of volunteer service. Notable examples of BHB's CD services include:

- A senior officer serves on the board of an organization that works to ensure every child in Milwaukee has the opportunity to attend a high-quality school. They impact about 16,500 students by supporting 43 schools across Milwaukee and 85 percent of the students in the network of schools qualify for free or reduced lunch.
- A senior officer serves on the board of an organization that provides a variety of services to over 1,700 low- and moderate-income persons. Services include a community learning center, youth and elderly education programs, health and human services, and neighborhood redevelopment plans.
- A bank manager serves on the board of an organization that serves former members of our armed forces who find themselves in need of housing, education programs, and reintegration services.

Madison, WI MSA

BHB provides a relatively high level of CD services in the Madison, WI MSA. During the evaluation period, bank employees provided basic financial education to 49 students as part of the financial literacy curriculum offered by a nonprofit organization that serves low- and moderate-income students.

In addition, 11 employees served eight different community organizations. These employees provided 648 hours of CD services through participation on six boards, four committees, and two advisory groups. The employees also provided 46 hours of volunteer service. Notable examples of BHB's CD services include:

- A senior officer serves on the board of an organization that is a leader in youth development programs. They develop partnerships with other entities to produce positive outcomes for young people, families, and communities.
- A bank employee serves on the board of an organization whose mission is to provide innovative services dedicated to strengthening and improving the lives of run away, homeless, and at-risk youth, their families, and the community.

Wausau, WI MSA

BHB provides a relatively high level of CD services in the Wausau, WI MSA. During the evaluation period, bank employees provided basic financial education to 74 students as part of the financial literacy curriculum offered by a nonprofit organization that serves low- and moderate-income students. An employee also conducted a housing seminar about affordable housing options, down payment assistance programs, and other first time homebuyer information for eight clients of an organization that provides services to low- and moderate-income persons.

In addition, six employees served four different community organizations. These employees provided 462 hours of CD services through participation on four boards and 15 committees. Notable examples of BHB's CD services include:

- A bank manager serves on the board of an organization that provides various programs for low- and moderate-income residents. These programs include a food bank and pantry, community learning center, furniture and basic needs, and neighborhood outreach.
- A bank employee serves on the board of an organization unites people and organizations in the AA to help build a stronger community. They also strategically invest in education, financial stability, and health priorities to improve lives of low- and moderate-income persons.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Appleton, WI MSA; Janesville, WI MSA; and non-MSA WI is not inconsistent with the bank's overall outstanding performance in Wisconsin. The bank's performance in the Duluth MN-WI MSA; Eau Claire, WI MSA; Fond du Lac, WI MSA; Green Bay, WI MSA; La Crosse WI-MN MSA; Oshkosh-Neenah, WI MSA; Racine, WI MSA; and Sheboygan, WI MSA is weaker than the bank's overall performance in the state due to differences in branch distributions in low- and moderate-income geographies. The bank's performance in these limited scope areas did not have a significant impact on the bank's overall service test performance rating for the state of Wisconsin. 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”) and those that received a less comprehensive review (designated by the term “limited”).

Time Period Reviewed	Lending Test including CD loans: 01/01/2014 to 12/31/2016 Investment and Service Tests: 01/01/2014 to 12/31/2016	
Financial Institution	Products Reviewed	
BMO Harris Bank N.A. Chicago, IL	HMDA reported loans, CRA loans, community development loans, qualified investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Review Type	Other Information
Chicago-Naperville-Elgin, IL-IN-WI MMA Chicago-Naperville-Arlington Heights, IL MD Elgin, IL MD Gary, IN MD Lake County–Kenosha County, IL-WI MD	Full Full Limited Limited	Cook, DuPage, Grundy, Kendall, McHenry, Will Kane Lake, Porter IL – Lake; WI – Kenosha
Kansas City, MO–KS MMA	Full	KS – Johnson, Wyandotte MO – Clay, Jackson, Platte
Minneapolis-St. Paul-Bloomington, MN-WI MMA	Full	MN - Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Washington; WI - Pierce, St. Croix
St. Louis, MO-IL MMA	Full	IL – St. Clair MO – Jefferson, St. Charles, St. Louis, St. Louis City
State of Arizona Phoenix-Mesa-Scottsdale, AZ MSA Prescott, AZ MSA Tucson, AZ MSA	Full Limited Limited	Maricopa Yavapai Pima

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS		BMO Harris Bank N.A.		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BMO Harris Bank N.A.	Outstanding	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
Chicago-Naperville-Elgin, IL-IN-WI MMA	Outstanding	Outstanding	Outstanding	Outstanding
Kansas City, MO-KS MMA	Outstanding	Outstanding	Outstanding	Outstanding
Minneapolis-St. Paul-Bloomington, MN-WI MMA	Outstanding	Outstanding	Outstanding	Outstanding
St. Louis, MO-IL MMA	Outstanding	Outstanding	High Satisfactory	Outstanding
Arizona	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Illinois	Outstanding	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Kansas	High Satisfactory	Outstanding	Outstanding	Outstanding
Missouri	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Washington	Outstanding	Outstanding	Low Satisfactory	Outstanding
Wisconsin	Outstanding	Outstanding	Outstanding	Outstanding

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

Appendix C: Market Profiles for Full-Scope Areas

Chicago-Naperville-Elgin, IL-IN-WI MMA

Chicago-Naperville-Arlington Heights, IL MD

Demographic Information for Full-Scope Area: Chicago-Naperville-Arlington Heights, IL MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	1,758	13.71	22.81	31.97	31.23	0.28
Population by Geography	7,262,718	9.57	22.44	34.32	33.67	0.00
Owner-Occupied Housing by Geography	1,747,808	4.19	16.81	38.14	40.86	0.00
Occupied Rental Units by Geography	906,015	18.05	29.20	30.00	22.74	0.00
Vacant Units by Geography	281,444	21.96	27.01	26.24	24.78	0.00
Businesses by Geography	421,822	4.76	15.06	32.37	47.67	0.14
Farms by Geography	6,785	2.77	11.29	41.61	44.32	0.01
Family Distribution by Income Level	1,734,806	22.74	16.67	19.34	41.25	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	683,628	16.93	32.43	33.58	17.07	0.00
Median Family Income	\$72,196	Median Housing Value		\$182,400 to \$278,500		
FFIEC Adjusted Median Family Income for 2015	\$77,700	Unemployment Rate		5.90%		
Households Below Poverty Level	12.0%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Chicago-Naperville-Arlington Heights, IL MD AA consists of all six counties in the Chicago-Naperville-Arlington Heights, IL MD: Cook, DuPage, Grundy, Kendall, McHenry, and Will counties. On February 28, 2013 OMB revised the delineation of MSAs which removed DeKalb and Kane counties from the former Chicago-Naperville-Arlington Heights, IL MD and created the stand-alone Elgin, IL MD. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB's deposits in the AA comprised 60.13 percent of the bank's total deposits, making this BHB's largest AA in terms of deposits held.

Competition is significant with 165 other FDIC-insured depository institutions operating 2,024 offices in the AA. BMO operates 157 branches in the AA and has a 14.40 percent deposit market share which ranks second among all institutions. Major competitors include JPMorgan Chase Bank, N.A. with 305 branches and 22.22 percent deposit market share, Bank of America, N.A. with 141 branches and 11.65 percent deposit market share, and The Northern Trust Company with seven branches and a deposit market share of 8.28 percent.

Based on data from the Bureau of Labor Statistics (BLS), the Chicago-Naperville-Arlington Heights, IL MD AA has a well-diversified economy. Key sectors of the economy based on percentage of total employment include Professional and Business Services at 18.5 percent, Education and Health Services at 15.7 percent, Government at 11.5 percent, and Leisure and

Hospitality Services at 9.8 percent. Major employers include Advocate Health Care System, the University of Chicago, Northwestern Memorial Healthcare, JPMorgan Chase & Co., United Continental Holdings, and Walgreen Co. The unemployment rate in the Chicago-Naperville-Arlington Heights, IL MD was 8.5 percent in January 2014 compared to 5.9 percent in December 2016. However, job growth decelerated during 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units ranges from a low of \$182,400 in Grundy County to a high of \$278,500 in DuPage County. Based on the Federal Housing Finance Authority (FHFA) House Price Index (HPI) calculator, housing values increased approximately 16 percent over the evaluation period. Based on the 2015 median family income of \$77,700, low-income families make less than \$38,850 and moderate-income families make less than \$62,160. Depending on the county, housing values are 4.69 to 7.17 times the annual income of low-income families and 2.94 to 4.48 times the annual income of moderate-income families in the AA. Mortgage foreclosures have reduced to historical norms; however, mortgage refinancings remain slow as many homeowners continue to owe more on their mortgage than what their home is valued.

State and local budgetary pressures, along with above average crime rates have had an impact on the Chicago-Naperville-Arlington Heights, IL MD's population growth. The area has experienced an outflow of population over the evaluation period.

Information from numerous community contact interviews identified the following needs within the Chicago-Naperville-Arlington Heights, IL MD:

- Low- and moderate-income area multifamily acquisition and rehab loans
- Investments in Community Development Financial Institutions (CDFI) loan pools that make loans for affordable housing or micro loans to small businesses
- Service on CDFI boards or committees
- Small-dollar consumer loans or other consumer loans that compete with high-cost lenders
- Flexible purchase money mortgage loans for low- and moderate-income borrowers
- Credit-builder loans
- Low fee/low balance and second chance checking accounts
- Introductory savings and transaction accounts and incentives for saving
- Financial counseling and education programs including first time home buyers programs
- Participation in programs designed to keep homeowners in their home including foreclosure prevention
- SBA loans to small businesses
- Business loans of less than \$200,000

The Chicago-Naperville-Arlington Heights, IL MD yields abundant opportunities to serve the identified needs. There are many CD and social services organizations in the MD. Local governments have designated many areas for redevelopment and use a variety of resources to increase investments in those areas including tax increment financing districts, empowerment zones, CD block grants, and HOME Investment Partnership Programs.

Chicago-Naperville-Elgin, IL-IN-WI MMA

Elgin, IL MD

Demographic Information for Full-Scope Area: Elgin, IL MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	82	2.44	39.02	32.93	25.61	0.00
Population by Geography	515,269	0.97	36.91	30.38	31.74	0.00
Owner-Occupied Housing by Geography	131,189	0.36	28.69	34.53	36.41	0.00
Occupied Rental Units by Geography	37,791	3.25	52.41	32.74	11.60	0.00
Vacant Units by Geography	9,671	2.05	47.36	30.25	20.35	0.00
Businesses by Geography	25,274	2.07	22.32	40.23	35.38	0.00
Farms by Geography	713	0.56	19.07	45.30	35.06	0.00
Family Distribution by Income Level	127,448	19.51	18.20	21.03	41.27	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	48,054	1.59	53.67	29.17	15.57	0.00
Median Family Income	\$76,576	Median Housing Value		\$213,200		
FFIEC Adjusted Median Family Income for 2015	\$75,400	Unemployment Rate		5.80%		
Households Below Poverty Level	8.0%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Elgin, IL MD AA is the result of OMB separating DeKalb and Kane counties from the Chicago-Naperville-Arlington Heights, IL MD AA to create a stand-alone MD in 2013. The bank's AA includes only Kane County because they do not have a deposit-taking presence in DeKalb County. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB's deposits in the AA comprised 1.12 percent of the bank's total deposits.

Competition is substantial with 35 other FDIC-insured depository institutions operating more than 130 offices in the AA. BMO operates 19 branches in the AA and has a 9.27 percent deposit market share which ranks third among all institutions. Major competitors include JPMorgan Chase Bank, N.A. with 17 branches and 17.84 percent market share, Old Second National Bank with 14 branches and 13.64 percent deposit market share, and St. Charles Bank and Trust Company with six branches and a deposit market share of 7.30 percent.

Based on data from the BLS, Elgin, IL MD AA has a moderately-diversified economy. Key sectors of the economy based on percentage of total employment include Government at 16.6 percent, Professional and Business Services at 14.4 percent, Manufacturing at 13.8 percent, Education and Health Services at 12.7 percent, and Retail Trade at 10.01 percent. Major employers include JPMorgan Chase, Advocate Sherman Hospital, Provena Saint Joseph Hospital, and John B. Sanfillippo & Sons (Fisher Nuts). The unemployment rate in the AA was 9.0 percent in January 2014 compared to 5.8 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units in Kane County was \$213,200. Based on the FHFA HPI calculator, housing values increased approximately 18.7 percent over the evaluation period. Based on the 2015 median family income of \$75,400, low-income families make less than \$37,500 and moderate-income families make less than \$60,320. Housing values are 5.68 to 3.53 times the annual income of low- and moderate-income families, respectively.

State budgetary pressures at public employers, low level of highly skilled workers, and a weak housing market have had an impact Elgin, IL MD's population growth. The area has experienced an outflow of population over the evaluation period.

Information from numerous community contact interviews identified the following needs within the Elgin, IL MD:

- Affordable housing including affordable rental units
- Investments in CDFIs that make loans for affordable housing or micro loans to small businesses
- Homebuyer education and foreclosure prevention programs targeted to immigrants
- Financial counseling and education programs
- SBA loans to small businesses
- Small-dollar business loans

The Elgin, IL MD presents abundant opportunities to serve the identified needs; however, there are several challenges to meeting them. Although there are many CD and social services organizations within the MD for institutions to collaborate with, many residents and small businesses have difficulty meeting standard underwriting guidelines. Hurdles such as no funds for down payments, poor credit scores, or insufficient collateral prevent them from obtaining funding from some institutions. However, information from the community contacts indicate that a loan denied at one institution will often be funded by another.

Kansas City, MO–KS MMA

Demographic Information for Full-Scope Area: Kansas City, MO–KS MMA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	463	14.04	23.97	28.73	29.81	3.46
Population by Geography	1,687,103	9.13	22.59	32.61	35.66	0.01
Owner-Occupied Housing by Geography	444,817	5.87	19.21	34.58	40.34	0.00
Occupied Rental Units by Geography	214,959	16.55	33.71	30.89	18.85	0.00
Vacant Units by Geography	70,535	23.98	33.57	24.67	17.78	0.00
Businesses by Geography	121,181	7.16	19.21	29.57	42.22	1.83
Farms by Geography	3,222	3.57	15.24	36.96	43.82	0.40
Family Distribution by Income Level	428,765	20.27	17.16	20.96	41.62	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	160,479	17.15	33.97	31.73	17.14	0.00
Median Family Income	\$68,846	Median Housing Value		\$89,200 to \$215,600		
FFIEC Adjusted Median Family Income for 2015	\$74,700	Unemployment Rate		3.80%		
Households Below Poverty Level	11.0%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Kansas City, MO-KS MMA AA consists of five of the 14 counties that make up the MMA. BHB's AA includes the counties of Johnson and Wyandotte in Kansas and Clay, Jackson, and Platte in Missouri. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.74 percent of total bank deposits.

Competition is extensive with 98 other FDIC-insured depository institutions operating 568 offices in the AA. BHB operates 11 branches in the AA and has a 1.26 percent deposit market share which ranks 16th among all institutions. The top four competitors include UMB Bank, N.A. with 30 branches and 21.32 percent market share, Commerce Bank with 42 branches and 13.86 percent market share, Bank of America, N.A. with 38 branches and 11.17 percent market share, and U.S. Bank N.A. with 56 branches and 6.54 percent market share.

Based on data from the BLS, the Kansas City, MO-KS MMA AA has a well-diversified economy. Key sectors of the economy based on percentage of total employment include Professional and Business Services at 17.6 percent, Education and Health Services at 14.1 percent, Government at 14.0 percent, and Retail Trade at 10.4 percent. Major employers in the AA are Cerner Corporation, HCA Midwest Health System, Saint Luke's Health System, and Ford Motor Company. The unemployment rate in the Kansas City, MO-KS MMA was 6.3 percent in January 2014 compared to 3.8 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units ranges from a low of \$89,200 in Wyandotte County to a high of \$215,600 in Johnson County. Based on the FHFA HPI calculator, housing values in the MMA increased approximately 24.6 percent over the evaluation period. Based on the 2015 median family income of \$74,700, low-income families make less than \$37,350 and moderate-income

families make less than \$59,760. Depending on the county, housing values are 2.38 to 5.77 times the annual income of low-income families and 1.49 to 3.61 times the annual income of moderate-income families in the AA.

Interviewees from several community organizations identified the following needs within the Kansas City, MO-KS MMA AA:

- Affordable loans for home purchase and home repair
- Flexible underwriting guidelines including alternatives to using a credit report.
- Commercial and small business loans
- Pooled loan funds for borrowers that do not meet traditional credit standards
- Financial education

The Kansas City, MO-KS MMA offers adequate opportunities to meet the identified needs. There are a variety of CD and social service organizations. In addition, there is some opportunity provided by CDFIs, SBIC funds, and LIHTC funds and projects. We noted eight certified CDFIs, nine HUD-approved housing counseling agencies, and two SBA Small Business Development centers serving the Kansas City, MO-KS MMA.

Minneapolis-St. Paul-Bloomington, MN-WI MMA

Demographic Information for Full-Scope Area: Minneapolis-St. Paul-Bloomington, MN-WI MMA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	726	8.68	19.01	43.25	28.51	0.55
Population by Geography	2,974,931	6.87	16.51	44.92	31.58	0.13
Owner-Occupied Housing by Geography	826,953	2.75	13.41	48.26	35.57	0.00
Occupied Rental Units by Geography	330,405	15.98	27.36	41.08	15.56	0.00
Vacant Units by Geography	69,961	12.67	22.87	40.94	23.52	0.00
Businesses by Geography	235,491	4.93	15.11	43.77	36.17	0.02
Farms by Geography	6,540	1.38	8.96	56.21	33.46	0.00
Family Distribution by Income Level	739,381	19.04	17.31	22.77	40.88	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	268,747	11.35	24.41	45.88	18.35	0.00
Median Family Income	\$79,301	Median Housing Value		\$187,400 to \$267,000		
FFIEC Adjusted Median Family Income for 2015	\$85,700	Unemployment Rate		3.60%		
Households Below Poverty Level	9.0%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Minneapolis-St. Paul-Bloomington, MN-WI MMA AA consists of nine of the 16 counties that make up the MMA. BHB's AA includes the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington in Minnesota and Pierce and St. Croix in Wisconsin. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 4.03 percent of the total deposits of the bank.

Competition is significant with 126 other FDIC-insured depository institutions operating 680 offices in the AA. BHB operates 33 branches in the AA and has a 1.90 percent deposit market share which ranks fifth among all institutions. The top three competitors are Wells Fargo Bank, N.A. with 94 branches and 46.38 percent deposit market share, U.S. Bank, N.A. with 98 branches and 33.48 percent deposit market share, and TCF National Bank with 94 branches and 3.33 percent deposit market share.

Based on data from the BLS, the AA has a well-diversified economy. Key sectors of the economy based on percentage of total employment include Education and Health Services at 16.3 percent, Professional and Business Services at 15.7 percent, Government at 12.9 percent, and Manufacturing at 10.1 percent. Major employers in the AA include Target Corporation, Allina Health System, University of Minnesota, HealthPartners, Fairview Health System, and Wells Fargo & Co. The unemployment rate in the Minneapolis-St. Paul-Bloomington, MN-WI MMA was 5.0 percent in January 2014 compared to 3.6 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units ranges from a low of \$187,400 in Anoka County to a high of \$267,000 in Carver County. Based on the FHFA HPI calculator, housing values in the MMA increased

approximately 16.1 percent over the evaluation period. Based on the 2015 median family income of \$85,700, low-income families make less than \$42,850 and moderate-income families make less than \$68,560. Depending on the county, housing values are 4.37 to 6.23 times the annual income of low-income families and 2.73 to 3.89 times the annual income of moderate-income families in the AA.

Information from numerous community contact interviews identified the following needs within the Minneapolis-St. Paul-Bloomington, MN-WI MMA:

- Low-cost savings and checking accounts including “second-chance” accounts
- Affordable housing, including affordable rental units
- Investments in CDFIs that make loans for affordable housing or micro loans to small businesses
- Homebuyer education and foreclosure prevention programs
- Financial counseling and education programs including business planning assistance
- Start-up loans to small businesses

The Minneapolis-St. Paul-Bloomington, MN-WI MMA presents abundant opportunities to serve the identified needs. There are many CD and social services organizations within the AA for institutions to partner with, as well as a number of large, philanthropic foundations, universities, research institutes, and trade associations. We noted 21 certified CDFIs, 22 HUD-approved housing counseling agencies, and five SBA Small Business Development centers serving the Minneapolis-St. Paul-Bloomington, MN-WI MMA.

St. Louis, MO–IL MMA

Demographic Information for Full-Scope Area: St. Louis, MO–IL MMA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	486	14.61	18.52	35.60	30.86	0.41
Population by Geography	2,167,522	9.27	17.71	37.97	34.99	0.05
Owner-Occupied Housing by Geography	604,050	5.22	15.68	40.42	38.68	0.00
Occupied Rental Units by Geography	255,306	18.08	25.52	35.00	21.24	0.15
Vacant Units by Geography	93,368	23.63	27.03	30.65	18.47	.21
Businesses by Geography	140,433	6.39	15.36	34.73	43.40	0.13
Farms by Geography	3,587	2.12	11.65	43.16	42.99	0.08
Family Distribution by Income Level	555,667	20.80	16.58	20.48	42.15	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	207,692	17.18	26.93	37.07	18.81	0.01
Median Family Income	\$66,798	Median Housing Value		\$120,400 to \$188,200		
FFIEC Adjusted Median Family Income for 2015	\$72,200	Unemployment Rate		4.00%		
Households Below Poverty Level	12%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The St. Louis, MO-IL MMA AA consists of five of the 16 counties that make up the MMA. BHB's AA includes the counties of St. Clair in Illinois and Jefferson, St. Charles, St. Louis, and St. Louis City. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 1.40 percent of total bank deposits.

Competition is extensive with 89 other FDIC-insured depository institutions operating 646 offices in the AA. BHB operates 16 branches in the AA and has a 1.38 percent deposit market share which ranks 15th among all institutions. Primary competitors include U.S. Bank, N.A. with 92 branches and 15.10 percent deposit market share, Bank of America, N.A. with 50 branches and 13.21 percent deposit market share, Stifel Bank and Trust with 2 branches and 9.44 percent deposit market share, and Commerce Bank with 48 branches and 7.42 percent deposit market share. Scottrade Bank has the largest deposit market share in the MMA with 17.55 percent; however, they are not a direct competitor as they are an internet-based Federal Savings Bank that does not have any retail branches.

Based on data from the BLS, the St. Louis, MO-IL MMA AA has a well-diversified economy. Key sectors of the economy based on percentage of total employment include Education and Health Services at 17.9 percent, Professional and Business Services at 15.4 percent, Government at 11.8 percent, Leisure and Hospitality Services at 10.9 percent, and Retail Trade at 10.6 percent. Major employers in the AA include BJC Healthcare, Wal-Mart Stores Inc., SSM Health Care System, Washington University in St. Louis, and Boeing Defense, Space, and Security. The unemployment rate in the St. Louis, MO-IL MMA was 5.8 percent in January 2014 compared to 4.0 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units ranges from a low of \$120,400 in both St. Louis City and St. Clair County to a high of \$188,200 in St. Charles County. Based on the FHFA HPI calculator, housing values in the MMA increased approximately 14.9 percent over the evaluation period. Based on the 2015 median family income of \$72,200, low-income families make less than \$36,100 and moderate-income families make less than \$57,760. Depending on the county, housing values are 3.34 to 5.21 times the annual income of low-income families and 2.08 to 3.26 times the annual income of moderate-income families in the AA.

Interviewees from several community organizations identified the following needs within the St. Louis, MO-IL MMA AA:

- Flexible home mortgage financing including loans of \$50,000 or less for home purchases.
- Funding for acquisition and rehabilitation loans
- Home improvement loans
- Investment in CDFI loan pools that make loans for affordable housing or economic development projects
- Innovative products that provide access to banking, particularly in low-income areas
- Financial education for businesses and individuals

The St. Louis, MO-IL MMA AA offers adequate opportunities to meet the identified needs. There are a variety of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. We noted 10 certified CDFIs, 19 organizations working on affordable housing or economic development, and eight social service agencies serving the St. Louis, MO-IL MMA.

State of Arizona

Phoenix-Mesa-Scottsdale, AZ MSA

Demographic Information for Full-Scope Area: Phoenix-Mesa-Scottsdale, AZ MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	916	9.39	23.91	31.99	33.62	1.09
Population by Geography	3,817,117	8.42	24.46	33.25	33.69	0.18
Owner-Occupied Housing by Geography	916,515	3.61	20.72	35.75	39.90	0.02
Occupied Rental Units by Geography	465,487	14.12	34.05	31.45	20.33	0.05
Vacant Units by Geography	214,163	10.43	30.21	30.54	28.77	0.06
Businesses by Geography	328,755	6.48	15.34	29.60	47.97	0.60
Farms by Geography	6,198	5.65	15.73	32.04	46.14	0.44
Family Distribution by Income Level	913,798	20.93	17.44	20.15	41.48	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	350,618	13.75	36.07	32.18	18.00	0.00
Median Family Income	\$64,408	Median Housing Value		\$178,100		
FFIEC Adjusted Median Family Income for 2015	\$64,000	Unemployment Rate		4.10%		
Households Below Poverty Level	12%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Phoenix-Mesa-Scottsdale, AZ MSA AA consists of one of the two counties that comprise the MSA. BHB's AA includes only Maricopa County. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 2.62 percent of total bank deposits.

Competition is significant with 56 other FDIC-insured depository institutions operating 785 offices in the AA. BHB operates 41 branches in the AA and has a 2.56 percent deposit market share which ranks sixth among all institutions. The top four competitors include JPMorgan Chase Bank, N.A. with 174 branches and 27.18 percent market share, Wells Fargo Bank, N.A. with 160 branches and 24.09 percent market share, Bank of America, N.A. with 102 branches and 19.96 percent market share, and Western Alliance Bank with seven branches and 5.54 percent market share.

Based on data from the BLS, the Phoenix-Mesa-Scottsdale, AZ MSA has a well-diversified economy. Key sectors of the economy based on percentage of total employment include Professional and Business Services at 16.9 percent, Education and Health Services at 14.7 percent, Government at 12.2 percent, and Retail Trade at 12.1 percent. Major employers in the AA include Banner Health System, Wal-Mart Stores Inc., Fry's Food Stores, and Wells Fargo & Co. Unemployment in the Phoenix-Mesa-Scottsdale, AZ MSA was 6.2 percent in January 2014 compared to 4.1 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$187,100 for Maricopa County. Based on the FHFA HPI calculator, housing values in the MSA increased approximately 23.8 percent over the evaluation period. Based on the 2015 median family income of \$64,000, low-income families make less than \$32,000 and moderate-income families make less than \$51,200. Housing values are 5.84 to 3.65 times the annual income of low- and moderate-income families, respectively.

A review of community contacts indicated that the following are identified needs within the community:

- Greater access to bank branches in LMI communities
- Credit products to acquire housing for LMI individuals
- More innovative products and services for small businesses
- Education for small businesses on the use of credit cards
- Contributions to various non-profit organizations serving small businesses and LMI communities and individuals
- Investments in and development of relationships with CDFIs

The Phoenix-Mesa-Scottsdale, AZ MSA offers adequate opportunities to meet the identified needs. There are a variety of non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. We noted eight certified CDFIs, 18 HUD-approved housing counseling agencies, and three SBA Small Business Development centers serving the Phoenix-Mesa-Scottsdale, AZ MSA.

State of Florida

North Port-Sarasota-Bradenton, FL MSA

Demographic Information for Full-Scope Area: North Port-Sarasota-Bradenton, FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	172	2.33	24.42	45.35	27.91	0.00
Population by Geography	702,281	2.67	23.45	46.77	27.11	0.00
Owner-Occupied Housing by Geography	228,050	1.26	20.07	48.99	29.68	0.00
Occupied Rental Units by Geography	72,159	5.15	31.07	44.09	19.68	0.00
Vacant Units by Geography	96,423	1.17	22.70	39.07	37.07	0.00
Businesses by Geography	91,416	1.55	20.24	42.80	35.41	0.00
Farms by Geography	2,567	1.68	17.80	47.02	33.50	0.00
Family Distribution by Income Level	188,229	19.55	19.05	20.92	40.47	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	72,663	4.42	32.53	46.69	16.36	0.00
Median Family Income	\$60,626	Median Housing Value		\$175,100		
FFIEC Adjusted Median Family Income for 2015	\$62,300	Unemployment Rate		4.10%		
Households Below Poverty Level	10%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The North Port-Bradenton-Sarasota, FL MSA AA consists of the two counties that comprise the MSA in its entirety: Manatee and Sarasota counties. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.57 percent of total bank deposits.

Competition is significant with 39 other FDIC-insured depository institutions operating 281 offices in the AA. BHB operates nine branches in the AA and has a 2.43 percent deposit market share which ranks eighth among all institutions. The top four competitors include Bank of America, N.A. with 34 branches and 19.95 percent market share, Wells Fargo Bank, N.A. with 30 branches and 15.73 percent market share, SunTrust Bank with 31 branches and 11.17 percent market share, and Branch Banking and Trust Company with 20 branches and a market share of 6.32 percent.

Based on data from the BLS, the North Port-Bradenton-Sarasota, FL MSA has a moderately-diversified economy. Key sectors of the economy based on percentage of total employment include Education and Health Services at 17.7 percent, Leisure and Hospitality Services at 15.0 percent, Professional and Business Services at 14.7 and Retail Trade at 14.6 percent. Major employers in the AA include Sarasota Memorial Health Care System, Beall's Inc., Manatee Memorial Hospital, and PGT Industries. The unemployment rate in the North Port-Bradenton-Sarasota, FL MSA was 6.2 percent in January 2014 compared to 4.4 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$175,100 for the North Port-Bradenton-Sarasota, FL MSA. Based on the FHFA HPI calculator, housing values in the MSA increased approximately 41.1 percent over the evaluation period. Based on the 2015 median family income of \$62,300, low-income families make less than \$31,150 and moderate-income families make less than \$49,840. Housing values are 5.62 to 3.51 times the annual income of low- and moderate-income families, respectively.

A review of community contacts indicated that the following are identified needs within the community:

- Free checking or second chance programs for LMI individuals
- Small business and real estate loans
- Individual Development Accounts (matched savings programs)
- Financial education programs for LMI individuals and small businesses

The North Port-Bradenton-Sarasota, FL MSA presents constrained opportunities to meet the identified needs. We noted two certified CDFIs, two HUD-approved housing counseling agencies, and no SBA Small Business Development centers serving the North Port-Bradenton-Sarasota, FL MSA.

State of Florida

Punta Gorda, FL MSA

Demographic Information for Full-Scope Area: Punta Gorda, FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	38	0.00	7.89	71.05	21.05	0.00
Population by Geography	159,978	0.00	7.06	76.70	16.23	0.00
Owner-Occupied Housing by Geography	58,377	0.00	6.26	76.48	17.26	0.00
Occupied Rental Units by Geography	13,614	0.00	15.13	77.44	7.43	0.00
Vacant Units by Geography	27,431	0.00	5.91	74.11	19.98	0.00
Businesses by Geography	19,181	0.00	6.61	78.90	14.49	0.00
Farms by Geography	652	0.00	7.36	74.85	17.79	0.00
Family Distribution by Income Level	48,044	16.43	19.62	25.30	38.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,321	0.00	9.36	79.93	10.70	0.00
Median Family Income	\$52,533	Median Housing Value		\$145,700		
FFIEC Adjusted Median Family Income for 2015	\$58,400	Unemployment Rate		5.00%		
Households Below Poverty Level	10%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Punta Gorda, FL MSA AA consists of one county in its entirety: Charlotte County. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.05 percent of total bank deposits.

Competition is extensive with 17 other FDIC-insured financial institutions operating 54 offices in the AA. BHB operates one branch in the AA and has a 1.10 percent deposit market share which ranks 15th among all institutions. The top four competitors include Wells Fargo Bank, N.A. with eight branches and 21.08 percent market share, Bank of America, N.A. with six branches and 20.35 percent market share, SunTrust Bank with eight branches and 12.56 percent market share, and Charlotte State Bank and Trust with five branches and a market share of 8.61 percent.

Based on data from the BLS, the Punta Gorda, FL MSA has a moderately-diversified economy. Key sectors of the economy based on percent of total employment include Retail Trade at 19.9 percent, Education and Health Services at 19.8 percent, Leisure and Hospitality Services at 15.0 percent, and Government at 13.1 percent. Major employers in the AA include Wal-Mart Stores Inc., St. Joseph Preferred Healthcare, Fawcett Memorial Hospital, and Publix Super Markets, Inc. The unemployment rate in the Punta Gorda, FL MSA was 7.3 percent in January 2014 compared to 5.0 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$145,700 for the Punta Gorda, FL MSA. Based on the FHFA HPI

calculator, housing values in the MSA increased approximately 32.5 percent over the evaluation period. Based on the 2015 median family income of \$58,400, low-income families make less than \$29,200 and moderate-income families make less than \$46,720. Housing values are 4.99 to 3.11 times the annual income of low- and moderate-income families, respectively.

A review of community contacts indicated that the following are identified needs within the community:

- Small dollar loans to small businesses
- Revolving loans for new small businesses
- Banking assistance for the retirement community

The Punta Gorda, FL MSA presents constrained opportunities to meet the identified needs. We noted no certified CDFIs, no HUD-approved housing counseling agencies, and one SBA Small Business Development center serving the Punta Gorda, FL MSA.

State of Illinois

Rockford, IL MSA

Demographic Information for Full-Scope Area: Rockford, IL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	84	11.90	27.38	38.10	21.43	1.19
Population by Geography	349,431	8.23	22.66	42.71	26.40	0.00
Owner-Occupied Housing by Geography	93,629	4.00	19.24	45.61	31.16	0.00
Occupied Rental Units by Geography	36,745	16.72	34.92	35.13	13.24	0.00
Vacant Units by Geography	14,508	19.76	32.78	32.11	15.35	0.00
Businesses by Geography	17,685	6.22	19.67	45.68	28.00	0.44
Farms by Geography	868	1.73	9.91	55.76	32.37	0.23
Family Distribution by Income Level	88,824	21.62	17.49	21.84	39.06	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	34,735	14.48	31.55	38.86	15.12	0.00
Median Family Income	\$61,291	Median Housing Value		\$121,100		
FFIEC Adjusted Median Family Income for 2015	\$63,100	Unemployment Rate		6.60%		
Households Below Poverty Level	14%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Rockford, IL MSA AA consists of two counties in their entirety: Boone and Winnebago. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.88 percent of total bank deposits.

Competition is significant with 25 other FDIC-insured depository institutions operating 85 offices in the AA. BHB operates 11 branches in the AA and has a 12.38 percent deposit market share which ranks second among all institutions. Major competitors include Alpine Bank and Trust Company with 17 branches and an 18.48 percent market share, JPMorgan Chase Bank, N.A. with seven branches and a 10.94 percent market share, and Associated Bank, N.A. with six branches and a market share of 10.38 percent.

Based on data from the BLS, the Rockford, IL MSA AA does not have a well-diversified economy. Key sectors of the economy based on percent of total employment include Manufacturing at 21.2 percent (primarily durable goods at 84.1 percent), Education and Health Services at 15.4 percent, Government at 11.0 percent, and Professional and Business Services at 10.7 percent. Major employers in the AA include FCA USA LLC, Mercy Rockford Health system, Swedish American Health System, OSF Saint Anthony Medical Center, and UTC Aerospace Systems. The unemployment rate in the Rockford, IL MSA lowered from 11.0 percent in January 2014 to 6.6 percent in December 2016. While the unemployment rate has dropped over the evaluation period, the improvement has been erratic, coinciding with fluctuations in the auto industry.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$121,100 for the Rockford, IL MSA. Based on the FHFA HPI calculator, housing values in the MSA increased approximately 7.1 percent over the evaluation period. Based on the 2015 median family income of \$63,100, low-income families make less than \$31,550 and moderate-income families make less than \$50,480. Housing values are 3.84 to 2.40 times the annual income of low- and moderate-income families, respectively.

State and local budgetary pressures, along with high rates of crime and poverty, has led to a contracting population in the Rockford, IL MSA. High employment volatility as a result of fluctuations in the auto industry and a shortage of skilled workers has generated uncertainty within the labor market in the AA.

Information from numerous community contact interviews identified the following needs within the Rockford, IL MSA:

- Financial education and asset-building programs
- Job training and skill development for displaced workers
- Affordable flexible purchase money mortgages
- Small business financing and technical assistance

The Rockford, IL MSA has numerous CD organizations operating within the AA and they provide ample opportunities for financial institutions to serve the identified needs. Based on information from various community contacts, local institutions have been doing a good job of reaching out to small businesses in the AA. The contacts also stated that most local banks also provide financial literacy courses to area residents.

State of Indiana

Indianapolis-Carmel-Anderson, IN MSA

Demographic Information for Full-Scope Area: Indianapolis-Carmel-Anderson, IN MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	366	13.66	28.42	34.15	23.50	0.27
Population by Geography	1,720,234	8.52	24.50	34.80	31.99	0.20
Owner-Occupied Housing by Geography	441,709	5.43	19.52	38.12	36.93	0.00
Occupied Rental Units by Geography	210,385	15.44	40.21	29.49	14.85	0.00
Vacant Units by Geography	85,981	23.64	34.35	27.24	14.76	0.00
Businesses by Geography	117,491	5.36	20.05	37.57	36.99	0.03
Farms by Geography	3,870	2.38	10.44	53.46	33.70	0.03
Family Distribution by Income Level	427,884	21.36	17.21	20.42	41.01	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	165,038	15.92	35.40	32.70	15.98	0.00
Median Family Income	\$64,663	Median Housing Value		\$90,400 to \$229,000		
FFIEC Adjusted Median Family Income for 2015	\$68,900	Unemployment Rate		3.60%		
Households Below Poverty Level	12%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Indianapolis-Carmel, IN MSA AA consists of seven of the 11 counties in the Indianapolis-Carmel, IN MSA: Boone, Hamilton, Hendricks, Johnson, Madison, Marion, and Morgan counties. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 2.89 percent of total bank deposits.

Competition is significant with 40 other FDIC-insured depository institutions operating 468 offices in the AA. BHB operates 37 branches in the AA and has a 5.52 percent deposit market share which ranks fifth among all institutions. The top three competitors include JPMorgan Chase Bank, N.A. with 76 branches and 24.78 percent market share, PNC Bank, N.A. with 61 branches and 16.50 percent market share, and Fifth Third Bank with 38 branches and a market share of 9.36 percent.

Based on data from the BLS, the Indianapolis-Carmel, IN MSA has a moderately-diversified economy. Key sectors of the economy based on percentage of total employment include Professional and Business Services at 15.9 percent, Education and Health Services at 14.4 percent, Government at 12.7 percent, and Retail Trade at 10.5 percent. Major employers in the AA include St. Vincent Hospitals and Health Services, Indiana University Health, Eli Lilly and Company, and Community Health Network. The unemployment rate in the Indianapolis-Carmel, IN MSA was 6.2 percent in January 2014 compared to 3.6 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units ranges from a low of \$90,400 in Madison County to a high of \$229,000 in Hamilton County. Based on the FHFA HPI calculator, housing values in the MSA increased

approximately 15.2 percent over the evaluation period. Based on the 2015 median family income of \$68,900, low-income families make less than \$34,450 and moderate-income families make less than \$55,120. Depending on the county, housing values are 2.62 to 6.65 times the annual income of low-income families and 1.64 to 4.15 times the annual income of moderate-income families in the AA.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing including single and multifamily housing developments
- Loans to CD organizations
- Developer lines of credit
- Construction financing
- Tax-credit funding
- Revolving loan products for economic development
- Partnerships with CD organizations
- Investments in neighborhood redevelopment programs
- Partnerships with agencies involved in economic and business development
- Grants for the construction of LMI housing
- Financing for transit oriented affordable multifamily housing

The Indianapolis-Carmel, IN MSA presents ample opportunities to meet the identified needs. Numerous nonprofit organizations engage in affordable housing and economic development endeavors and provide community services targeted to low- and moderate-income persons and geographies, primarily in neighborhoods in the central city of Indianapolis. There are six certified CDFIs, 12 nonprofit CD corporations that engage in residential and commercial real estate development, four HUD-approved housing counseling agencies, and two SBA Small Business Development centers.

State of Kansas

Non-Metropolitan KS

Demographic Information for Full-Scope Area: Non-Metropolitan KS						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	11	0.00	18.18	72.73	9.09	0.00
Population by Geography	39,134	0.00	11.76	69.19	19.06	0.00
Owner-Occupied Housing by Geography	10,056	0.00	10.12	76.10	13.77	0.00
Occupied Rental Units by Geography	5,428	0.00	23.42	54.77	21.81	0.00
Vacant Units by Geography	2,323	0.00	15.50	73.14	11.36	0.00
Businesses by Geography	2,160	0.00	25.56	59.12	15.32	0.00
Farms by Geography	246	0.00	5.28	86.59	8.13	0.00
Family Distribution by Income Level	9,119	20.01	20.53	21.00	38.46	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,697	0.00	21.75	70.25	8.01	0.00
Median Family Income	\$52,419	Median Housing Value		\$85,900		
FFIEC Adjusted Median Family Income for 2015	\$57,700	Unemployment Rate		4.40%		
Households Below Poverty Level	19%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The non-MSA Kansas AA consists of Crawford County in its entirety. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.05 percent of total bank deposits.

Competition is significant with 11 FDIC-insured depository institutions operating 20 offices in the AA. BHB operates two branches in the AA and has a 5.42 percent deposit market share which ranks sixth among all institutions. The top four competitors include The Grand National Bank with three branches and 24.34 percent market share, Commerce Bank with two branches and 18.41 percent market share, Community National Bank and Trust with four branches and 15.49 percent market share, and Labette Bank with three branches and a market share of 11.14 percent.

Based on data from the BLS, the non-MSA Kansas AA has a moderately-diversified economy. Key sectors of the economy based on percent of total employment include Government at 25.7 percent, Trade, Transportation, and Utilities at 18.2 percent, Manufacturing at 14.6 percent, Education, and Health Services at 14.2 percent. Major employers in the AA include Pittsburg State University, Via Christi Hospital, Wal-Mart Stores Inc., and Pitt Plastics. The unemployment rate in Crawford County was 5.9 percent in January 2014 compared to 4.4 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$85,900 for Crawford County. Based on the 2015 median family income of \$57,700, low-income families make less than \$28,850 and moderate-income families make less than \$46,160. Housing values are 2.98 to 1.86 times the annual income of low- and moderate-income families, respectively.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing
- Small dollar loans
- Construction loans
- Grants for CD projects
- Grants for housing development
- Grants for the expansion of public transportation
- Financial education programs

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

State of Missouri

St. Joseph, MO-KS MSA

Demographic Information for Full-Scope Area: St. Joseph, MO-KS MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	29	0.00	17.24	65.52	17.24	0.00
Population by Geography	106,492	0.00	14.46	64.32	21.22	0.00
Owner-Occupied Housing by Geography	28,240	0.00	10.66	65.87	23.46	0.00
Occupied Rental Units by Geography	12,306	0.00	20.21	65.91	13.88	0.00
Vacant Units by Geography	4,985	0.00	32.82	59.34	7.84	0.00
Businesses by Geography	5,650	0.00	16.30	62.99	20.71	0.00
Farms by Geography	543	0.00	2.21	79.74	18.05	0.00
Family Distribution by Income Level	26,614	18.90	18.32	22.83	39.95	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,906	0.00	18.82	65.01	16.17	0.00
Median Family Income	\$54,339	Median Housing Value		\$109,700 to \$127,200		
FFIEC Adjusted Median Family Income for 2015	\$61,500	Unemployment Rate		3.70%		
Households Below Poverty Level	13%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The St. Joseph, MO-KS MSA AA consists of two of the four counties in the St. Joseph, MO-KS MSA: Andrew and Buchanan. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.04 percent of total bank deposits.

Competition is extensive with 14 FDIC-insured depository institutions operating 33 offices in the AA. BHB operates one branch in the AA and has a 1.83 percent deposit market share which ranks 10th among all institutions. The top three competitors include The Nodaway Valley Bank with five branches and 24.34 percent market share, Commerce Bank with three branches and 22.42 percent market share, and U.S. Bank N.A. with five branches and a market share of 12.91 percent.

Based on data from the BLS, the St. Joseph, MO-KS MSA does not have a well-diversified economy. Key sectors of the economy based on percentage of total employment include Government at 18.9 percent, Manufacturing at 17.0 percent, and Education and Health Services at 15.4 percent. Major employers in the AA include Mosaic Life Care and Triumph Foods Inc. The unemployment rate in the St. Joseph, MO-KS MSA, was 6.3 percent in January 2014 compared to 3.7 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$109,700 for Buchanan County and \$127,200 in Andrew County in the St. Joseph, MO-KS MSA. Based on the FHFA HPI calculator, housing values in the MSA increased approximately 10.4 percent over the evaluation period. Based on the 2015 median

family income of \$61,500, low-income families make less than \$30,750 and moderate-income families make less than \$49,200. Depending on the county, housing values are 3.56 to 4.14 times the annual income of low-income families and 2.23 to 2.58 times the annual income of moderate-income families in the AA.

A review of community contacts indicated that the following are identified needs within the community:

- Small dollar loans
- Credit for home repairs
- Affordable loans to non-profit organizations
- Affordable loans for immigrants
- Check-cashing for non-bank customers
- Loans for individuals with no credit history
- Loans for LMI individuals
- Financial education programs

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

State of Washington

Seattle-Bellevue-Everett, WA MD

Demographic Information for Full-Scope Area: Seattle-Bellevue-Everett, WA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	398	5.03	17.84	44.47	32.16	0.50
Population by Geography	1,931,249	4.59	17.79	46.05	31.27	0.30
Owner-Occupied Housing by Geography	468,539	1.72	13.22	47.34	37.72	0.00
Occupied Rental Units by Geography	313,438	8.60	24.92	45.04	21.39	0.05
Vacant Units by Geography	53,587	8.25	18.84	43.14	29.73	0.04
Businesses by Geography	195,101	4.92	14.64	43.21	37.06	0.17
Farms by Geography	3,479	2.33	12.85	49.47	35.33	0.03
Family Distribution by Income Level	456,029	19.98	16.95	21.06	42.02	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	168,404	6.56	27.46	47.64	18.34	0.00
Median Family Income	\$83,852	Median Housing Value				\$384,300
FFIEC Adjusted Median Family Income for 2016	\$89,600	Unemployment Rate				3.44%
Households Below Poverty Level	10%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Seattle-Bellevue-Everett, WA MD AA consists of one of the two counties that make up the Seattle-Bellevue-Everett, WA MD: King County. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.01 percent of total bank deposits.

Competition is extensive with approximately 46 FDIC-insured depository institutions operating 543 branches in the AA. BHB operates one branch in the AA, which is located on the 20th floor of an office building and offers traditional wealth management products and services. BHB has a 0.01 percent deposit market share which ranks 44th among all institutions. The top four competitors include Bank of America, N.A. with 89 branches and 29.01 percent market share, Wells Fargo, N.A. with 66 branches and 13.80 percent market share, and JPMorgan Chase Bank, N.A. with 86 branches and 11.87 percent market share, and U.S. Bank N.A. with 56 branches and a market share of 11.77 percent.

Based on data from the BLS, the Seattle-Bellevue-Everett, WA MD AA does not have a well-diversified economy. Key sectors of the economy based on percentage of total employment include Professional and Business Services at 15.1 percent, Government at 13.4 percent, and Education and Health Services at 12.8 percent. Major employers in the AA include Boeing Co., Microsoft Corporation, the University of Washington, and Amazon. Based on data from the Bureau of Labor Statistics, the unemployment rate in King County was 5.0 percent in January 2014 compared to 3.4 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$384,300 for King County in the Seattle-Bellevue-Everett, WA MD. Based on the FHFA HPI calculator, housing values in the MSA increased approximately 34.9 percent over the evaluation period. Based on the 2015 median family income of \$89,600, low-income families make less than \$44,800 and moderate-income families make less than \$71,680. Housing values are 8.58 to 5.36 times the annual income of low- and moderate-income families, respectively.

Interviewees from several community organizations identified the following needs within the Seattle-Bellevue-Everett, WA MD AA:

- Construction and/or permanent financing for affordable housing, mixed-use commercial properties, and health clinics
- SBA loans of \$350,000 or less
- Funding for permanent supportive housing and services for the homeless
- Funding for improvement of public facilities such as libraries, schools, and the airport
- Financing for improvement of older homes
- Investment in CDFI loan pools that make loans for affordable housing or economic development projects
- Debt and equity investments in affordable housing (LIHTCs) and economic development projects (NMTCs)
- Financial education for small business owners
- Financial education for LMI households including initiatives to help consumers avoid payday lenders and other predatory financial services

The Seattle-Bellevue-Everett, WA MD AA offers adequate opportunities to meet the identified needs. There are a variety of CD and social service organizations, including nine CDFIs, five SBA Small Business Development centers. In addition, the City of Seattle coordinates with other public agency programs to use LIHTCs and NMTCs in funding capital and development projects.

State of Wisconsin

Milwaukee-Waukesha-West Allis, WI MSA

Demographic Information for Full-Scope Area: Milwaukee-Waukesha-West Allis, WI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	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
Occupied Rental Units by Geography	228,941	23.34	21.32	38.69	16.65	0.00
Vacant Units by Geography	48,806	29.27	19.91	30.26	20.56	0.00
Businesses by Geography	83,064	9.02	13.85	38.82	38.28	0.03
Farms by Geography	1,898	3.00	7.17	43.84	46.00	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		\$193,600		
FFIEC Adjusted Median Family Income for 2015	\$73,300	Unemployment Rate		3.90%		
Households Below Poverty Level	12%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Milwaukee-Waukesha-West Allis, WI MSA AA consists of the four counties in the MSA in their entirety: Milwaukee, Ozaukee, Washington, and Waukesha. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 10.81 percent of the bank's total deposits, making this AA the bank's second largest in terms of deposits held.

Competition is significant with approximately 50 FDIC-insured depository institutions operating 481 offices in the AA. BHB operates 71 branches in the AA and has a 13.76 percent deposit market share which ranks second among all institutions. Major competitors include U.S. Bank, N.A. with 55 branches and 38.83 percent deposit market share, Associated Bank, N.A. with 44 branches and 9.52 percent deposit market share, and JPMorgan Chase Bank, N.A. with 29 branches and a deposit market share of 9.25 percent.

Based on data from the BLS, the Milwaukee-Waukesha-West Allis, WI MSA AA has a moderately-diversified economy. Key sectors of the economy by percentage of employment include Education and Health Services at 18.9 percent, Professional and Business Services at 14.6 percent, Manufacturing at 14.2 percent, and Government at 10.1 percent. Major employers in the AA include Aurora Health Care Inc., Wheaton Franciscan Healthcare, Froedtert and Community Health, Roundy's Inc., Kohl's Department Stores Inc., and Wal-Mart Stores Inc. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Milwaukee-Waukesha-West Allis, WI MSA was 6.6 percent in January 2014 compared to 3.9 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$193,600 for the Milwaukee-Waukesha-West Allis, WI MSA. Based on the FHFA HPI calculator, housing values in the MSA increased approximately 16.3 percent over the evaluation period. Based on the 2015 median family income of \$73,300, low-income families make less than \$36,650 and moderate-income families make less than \$58,640. Housing values are 5.28 to 3.30 times the annual income of low- and moderate-income families, respectively.

A review of community contacts indicated that the following are identified needs within the community:

- Financing for new and existing small businesses
- Affordable housing development
- Home improvement loans at the time of purchase
- Flexible down payment and loan to value terms
- Rehab lending
- Loans to support job training and employment readiness programs
- Retail deposit products targeted to participants in workforce development programs
- Credit builder products and participation in credit enhancement programs
- Lines of credit, construction loans, and permanent financing for nonprofit organizations that acquire and develop single family homes for sale and multifamily buildings for rent
- Programs to assist first time LMI home-buyers
- Financial counseling programs or donations to local non-profit home counseling organizations
- Partnerships with organizations that provide training for start-up and ongoing business owners
- Partnerships with CD organizations and CDFIs
- Small business development
- Foreclosure prevention programs

The Milwaukee-Waukesha-West Allis, WI MSA offers numerous opportunities to meet the identified needs. There are a variety of CD and social service organizations, including 11 certified CDFIs, 12 organizations working on affordable housing or economic development, and four social service agencies. There are also 13 neighborhoods in the City of Milwaukee that are targeted for redevelopment.

State of Wisconsin

Madison, WI MSA

Demographic Information for Full-Scope Area: Madison, WI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	125	6.40	14.40	55.20	21.60	2.40
Population by Geography	568,593	5.48	13.42	58.05	22.49	0.55
Owner-Occupied Housing by Geography	146,782	1.41	10.88	63.05	24.67	0.00
Occupied Rental Units by Geography	82,251	10.68	19.89	52.54	16.86	0.03
Vacant Units by Geography	20,623	10.84	17.05	54.25	17.85	0.00
Businesses by Geography	41,018	3.76	13.50	56.88	25.25	0.61
Farms by Geography	2,544	0.28	10.02	70.28	19.26	0.16
Family Distribution by Income Level	136,215	18.04	17.80	24.78	39.38	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	48,816	4.39	21.02	60.71	13.88	0.00
Median Family Income	\$76,735	Median Housing Value		\$163,300 to \$230,800		
FFIEC Adjusted Median Family Income for 2015	\$82,800	Unemployment Rate		2.60%		
Households Below Poverty Level	11%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Madison, WI MSA AA consists of three of the four counties in the Madison, WI MSA: Columbia, Dane, and Iowa. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 3.20 percent of the bank's total deposits.

Competition is significant with approximately 47 FDIC-insured depository institutions operating 196 offices in the AA. BHB operates 23 branches in the AA and has a 15.73 percent deposit market share which ranks first among all institutions. Major competitors include U.S. Bank, N.A. with 15 branches and 10.17 percent deposit market share, Associated Bank, N.A. with 24 branches and 8.03 percent deposit market share, and First Business Bank with one branch and a deposit market share of 6.60 percent.

Based on data from the BLS, the Madison, WI MSA has a moderately-diversified economy. Key sectors of the economy based on percentage of total employment include Government at 22.3 percent, Professional and Business Services at 12.7 percent, and Education and Health Services at 11.6 percent. Major employers in the AA include UW Hospital and Clinics Authority, American Family Insurance, WPS Health Insurance, and Meriter Health Services Inc. The unemployment rate in the Madison, WI MSA was 4.6 percent in January 2014 compared to 2.6 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units ranges from a low of \$163,300 in Iowa County to a high of \$230,800 for Dane County in the Madison, WI MSA. Based on the FHFA HPI calculator, housing values in

the MSA increased approximately 13.0 percent over the evaluation period. Based on the 2015 median family income of \$82,800, low-income families make less than \$41,400 and moderate-income families make less than \$66,240. Depending on the county, housing values are 3.94 to 5.57 times the annual income of low-income families and 2.47 to 3.48 times the annual income of moderate-income families in the AA.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing for LMI areas and individuals
- Funding for new commercial and residential developments
- Funding for business start-ups and expansions
- Participation in programs that promote housing development and the availability of land for affordable housing and the maintenance/rehabilitation of existing houses

The Madison, WI MSA offers limited opportunities to meet the identified needs. There are few CD and social service organizations, including three certified CDFIs, three HUD-approved housing counseling agencies, and two SBA Small Business Development centers serving the AA.

State of Wisconsin

Wausau, WI MSA

Demographic Information for Full-Scope Area: Wausau, WI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies	27	0.00	22.22	70.37	7.41	0.00
Population by Geography	134,063	0.00	16.46	72.62	10.91	0.00
Owner-Occupied Housing by Geography	39,797	0.00	13.86	75.82	10.32	0.00
Occupied Rental Units by Geography	12,911	0.00	28.91	60.95	10.14	0.00
Vacant Units by Geography	4,309	0.00	20.45	69.81	9.75	0.00
Businesses by Geography	8,006	0.00	17.82	67.05	15.13	0.00
Farms by Geography	927	0.00	11.22	79.83	8.95	0.00
Family Distribution by Income Level	36,328	17.35	19.31	25.47	37.86	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,320	0.00	23.45	69.26	7.29	0.00
Median Family Income	\$65,566	Median Housing Value Unemployment Rate				\$144,500
FFIEC Adjusted Median Family Income for 2015	\$63,300					3.62%
Households Below Poverty Level	8%					

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

Source: 2010 US Census, 2011-2015 American Community Survey, 2016 BLS, and 2015 FFIEC updated MFI.

The Wausau, WI MSA AA consists of Marathon County in its entirety. According to the FDIC's Summary of Deposits as of June 30, 2016, BHB deposits in the AA comprised 0.82 percent of the bank's total deposits.

Competition is extensive with approximately 21 FDIC-insured depository institutions direct competitors operating 48 offices in the AA. BHB operates eight branches in the AA and has a 21.65 percent deposit market share which ranks first among all institutions. Major competitors include Peoples State Bank with five branches and 15.99 percent deposit market share, River Valley Bank with five branches and 11.88 percent deposit market share, and Associated Bank, N.A. with four branches and a deposit market share of 11.18 percent.

Based on data from the BLS, the Wausau, WI MSA does not have a well-diversified economy. Key sectors of the economy based on percentage of total employment include Manufacturing at 22.5 percent (73.3 percent from durable goods), Education and Health Services at 14.2 percent, and Retail Trade at 12.6 percent. Major employers in the AA include St. Clare's Hospital, Aspirus Wausau Hospital Inc., and Footlocker/East Bay Inc. The unemployment rate in the Wausau, WI MSA was 6.1 percent in January 2014 compared to 3.2 percent in December 2016.

Data from 2011-2015 American Community Survey shows the median housing value of owner-occupied housing units was \$144,500 for the Wausau, WI MSA. Based on the FHFA HPI calculator, housing values in the MSA increased approximately 10.9 percent over the

evaluation period. Based on the 2015 median family income of \$63,300, low-income families make less than \$31,650 and moderate-income families make less than \$50,640. Housing values are 4.56 to 2.85 times the annual income of low- and moderate-income families, respectively.

A review of community contacts indicated that the following are identified needs within the community:

- Financing for business expansions
- Financing for CD programs
- Low interest financing and CD programs for minority- and women-owned businesses
- Financing for small businesses
- Financial education for small businesses
- Homeownership counseling
- Rehabilitation programs for distressed properties
- Partnerships with CD organizations focused on down payment assistance, housing rehabilitation, and rentals for LMI individuals

The Wausau, WI MSA presents constrained opportunities to meet the identified needs. There are a few non-profit organizations that work with financial institutions, local government, foundations, and others to meet the CD needs of the area. We noted no certified CDFIs, HUD-approved housing counseling agencies, or SBA Small Business Development centers serving the AA

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 aggregate 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/AA; (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 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 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 or for areas where volumes were not sufficient to analyze 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/AA. CD loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration.
- 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/AA. 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 aggregate 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 aggregate 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 aggregate 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 AA.
- 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 aggregate 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 AA.
- 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/AA. The table also presents aggregate 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. Aggregate 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. Aggregate 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/AA.
- 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.
- 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.

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Table 1. Lending Volume

LENDING VOLUME												
Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	% 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-Scope Review:												
Chicago-Naperville-Arlington Heights, IL MD	76.67	9,997	2,106,242	11,111	708,936	37	5,119	124	886,209	21,269	3,706,506	94.28
Elgin, IL MD	7.34	953	155,078	1,067	76,781	2	18	14	55,487	2,036	287,364	1.76
Limited-Scope Review:												
Gary, IN MD	5.68	814	105,860	750	30,091	4	585	9	12,544	1,577	149,080	1.08
Lake County–Kenosha County, IL-WI MD	10.31	1,417	319,456	1,370	116,426	51	5,356	22	69,710	2,860	510,948	2.88

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Chicago-Naperville-Arlington Heights, IL MD	3,299	75.72	4.19	2.91	16.81	14.85	38.14	36.28	40.86	45.95	2.78	12.98	37.48	46.76
Elgin, IL MD	291	6.68	0.36	0.00	28.69	26.46	34.53	34.71	36.41	38.83	0.35	21.43	34.22	44.01
Limited-Scope Review:														
Gary, IN MD	293	6.72	4.64	2.05	16.56	8.87	45.49	38.23	33.32	50.85	0.68	7.76	49.04	42.52
Lake County–Kenosha County, IL-WI MD	474	10.88	3.82	7.38	18.50	16.46	42.03	45.15	35.66	31.01	2.48	15.80	45.82	35.90

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA										Evaluation Period: JANUARY 1, 2014 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-Scope Review:															
Chicago-Naperville-Arlington Heights, IL MD	397	77.09	4.19	3.78	16.81	17.88	38.14	32.49	40.86	45.84	4.07	15.09	35.04	45.80	
Elgin, IL MD	28	5.44	0.36	0.00	28.69	21.43	34.53	35.71	36.41	42.86	0.27	15.66	35.71	48.35	
Limited-Scope Review:															
Gary, IN MD	38	7.38	4.64	2.63	16.56	13.16	45.49	47.37	33.32	36.84	2.20	12.16	46.96	38.68	
Lake County–Kenosha County, IL-WI MD	52	10.10	3.82	1.92	18.50	9.62	42.03	57.69	35.66	30.77	3.70	13.37	40.68	42.25	

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Chicago-Naperville-Arlington Heights, IL MD	6,298	75.83	4.19	2.16	16.81	11.31	38.14	34.57	40.86	51.97	2.42	10.36	33.31	53.91
Elgin, IL MD	634	7.63	0.36	0.32	28.69	20.82	34.53	30.91	36.41	47.95	0.30	15.36	33.51	50.83
Limited-Scope Review:														
Gary, IN MD	482	5.80	4.64	3.53	16.56	13.28	45.49	40.87	33.32	42.32	0.89	7.67	45.95	45.49
Lake County-Kenosha County, IL-WI MD	891	10.73	3.82	1.68	18.50	12.01	42.03	44.11	35.66	42.20	1.94	10.82	38.87	48.37

* Based on 2015 Peer Mortgage Data - US

** 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 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA									Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Chicago-Naperville-Arlington Heights, IL MD	3	75.00	12.27	66.67	21.75	0.00	32.46	0.00	33.52	33.33	13.77	30.38	32.17	23.67
Elgin, IL MD	0	0.00	3.01	0.00	48.93	0.00	35.91	0.00	12.15	0.00	5.17	37.93	44.83	12.07
Limited-Scope Review:														
Gary, IN MD	1	25.00	19.02	0.00	18.51	100.00	46.97	0.00	15.49	0.00	12.70	19.05	50.79	17.46
Lake County-Kenosha County, IL-WI MD	0	0.00	11.15	0.00	32.32	0.00	42.18	0.00	14.35	0.00	16.67	44.44	30.00	8.89

* Based on 2015 Peer Mortgage Data - US

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:															
Chicago-Naperville-Arlington Heights, IL MD	11,107	77.70	4.76	4.32	15.06	16.54	32.37	34.78	47.67	44.36	3.88	15.43	34.22	46.47	
Elgin, IL MD	1,067	7.46	2.07	1.22	22.32	21.74	40.23	37.02	35.38	40.02	2.04	19.00	37.42	41.53	
Limited-Scope Review:															
Gary, IN MD	750	5.25	5.87	11.60	13.95	17.87	46.36	40.53	33.68	30.00	4.40	12.67	45.57	37.36	
Lake County–Kenosha County, IL-WI MD	1,370	9.58	3.70	2.77	14.48	12.77	37.71	39.78	44.10	44.67	2.58	12.20	37.71	47.51	

* Based on 2015 Peer Small Business Data - US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp	
Full-Scope Review:															
Chicago-Naperville-Arlington Heights, IL MD	37	39.36	2.77	0.00	11.29	0.00	41.61	43.24	44.32	56.76	0.40	2.60	63.60	33.40	
Elgin, IL MD	2	2.13	0.56	0.00	19.07	0.00	45.30	50.00	35.06	50.00	0.00	2.35	60.00	37.65	
Limited-Scope Review:															
Gary, IN MD	4	4.26	2.38	25.00	6.00	50.00	57.66	25.00	33.95	0.00	1.39	4.17	77.78	16.67	
Lake County-Kenosha County, IL-WI MD	51	54.26	2.75	0.00	15.49	0.00	50.58	98.04	31.18	1.96	0.00	3.53	77.65	18.82	

* Based on 2015 Peer Small Business Data - US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA										Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
Full-Scope Review:															
Chicago-Naperville-Arlington Heights, IL MD	3,299	75.72	22.74	14.47	16.67	24.60	19.34	22.57	41.25	38.36	8.73	23.11	24.16	44.00	
Elgin, IL MD	291	6.68	19.51	17.08	18.20	29.89	21.03	21.35	41.27	31.67	10.70	25.03	24.78	39.49	
Limited-Scope Review:															
Gary, IN MD	293	6.72	21.39	9.22	17.26	26.60	21.71	31.56	39.64	32.62	10.56	26.75	28.07	34.61	
Lake County–Kenosha County, IL-WI MD	474	10.88	20.64	19.91	17.65	23.85	21.63	19.69	40.08	36.54	14.39	22.21	22.15	41.25	

* Based on 2015 Peer Mortgage Data - US

** 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 5.2 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA								Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Chicago-Naperville-Arlington Heights, IL MD	397	77.09	22.74	13.80	16.67	17.97	19.34	21.35	41.25	46.88	8.68	16.59	24.20	50.53
Elgin, IL MD	28	5.44	19.51	21.43	18.20	32.14	21.03	21.43	41.27	25.00	6.91	13.51	19.82	59.76
Limited-Scope Review:														
Gary, IN MD	38	7.38	21.39	8.11	17.26	24.32	21.71	21.62	39.64	45.95	10.54	18.46	28.10	42.89
Lake County–Kenosha County, IL-WI MD	52	10.10	20.64	9.62	17.65	17.31	21.63	23.08	40.08	50.00	12.01	14.59	20.97	52.43

* Based on 2015 Peer Mortgage Data - US

** 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 2.7 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA								Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Chicago-Naperville-Arlington Heights, IL MD	6,298	75.83	22.74	8.10	16.67	17.95	19.34	24.79	41.25	49.16	5.66	14.19	22.73	57.42
Elgin, IL MD	634	7.63	19.51	10.00	18.20	21.13	21.03	23.06	41.27	45.81	5.35	15.11	23.02	56.52
Limited-Scope Review:														
Gary, IN MD	482	5.80	21.39	14.96	17.26	19.44	21.71	25.43	39.64	40.17	8.42	18.95	26.92	45.71
Lake County–Kenosha County, IL-WI MD	891	10.73	20.64	12.11	17.65	17.19	21.63	22.49	40.08	48.21	6.49	13.54	21.95	58.02

* Based on 2015 Peer Mortgage Data - US

** 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 3.0 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Chicago-Naperville-Arlington Heights, IL MD	11,111	77.71	75.22	70.60	85.43	7.81	6.76	151,861	68,254
Elgin, IL MD	1,067	7.46	75.48	77.04	86.50	5.90	7.59	9,765	4,392
Limited-Scope Review:									
Gary, IN MD	750	5.25	77.53	76.67	91.60	4.00	4.40	7,951	3,403
Lake County–Kenosha County, IL-WI MD	1,370	9.58	78.64	65.04	80.44	9.85	9.71	19,121	9,012

* Based on 2015 Peer Small Business Data - US

** 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 - 2015).

**** 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 14.09 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Chicago-Naperville-Arlington Heights, IL MD	37	39.36	94.56	67.57	64.86	8.11	27.03	504	273
Elgin, IL MD	2	2.13	93.13	100.00	100.00	0.00	0.00	86	44
Limited-Scope Review:									
Gary, IN MD	4	4.26	96.69	50.00	75.00	0.00	25.00	74	42
Lake County–Kenosha County, IL-WI MD	51	54.26	93.05	41.18	68.63	21.57	9.80	86	35

* Based on 2015 Peer Small Business Data - US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 3.19 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI MMA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Chicago-Naperville-Arlington Heights, IL MD	108	131,258	691	379,622	799	510,880	54.56	52	161,122
Elgin, IL MD	6	9,594	59	20,266	65	\$29,860	3.19	0	0
Limited-Scope Review:									
Gary, IN MD	4	246	49	2,514	53	2,759	0.29	1	1,903
Lake County-Kenosha County, IL-WI MD	23	5,949	65	7,235	88	13,184	1.41	1	1

* '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-NAPERVILLE-ELGIN, IL-IN-WI MMA											Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Chicago-Naperville- Arlington Heights, IL MD	94.28	157	72.02	3.82	17.20	29.94	49.04	1	4	0	0	-1	-2	9.57	22.44	34.32	33.67
Elgin, IL MD	1.76	19	8.72	5.26	21.05	42.11	31.58	0	0	0	0	0	0	0.97	36.91	30.38	31.74
Limited-Scope Review:																	
Gary, IN MD	1.08	19	8.72	15.79	21.05	31.58	31.58	0	1	0	0	-1	0	7.68	19.59	43.88	28.85
Lake County– Kenosha County, IL- WI MD	2.88	23	10.55	8.70	8.70	39.13	43.48	0	1	0	0	-1	0	6.79	22.39	39.04	31.27

Table 1. Lending Volume

LENDING VOLUME		Geography: KANSAS CITY MO-KS MMA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% 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-Scope Review:												
Kansas City, MO-KS MMA	100.00	749	117,770	669	62,470	1	39	7	61,145	1,426	241,424	100.00

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of December 31, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: KANSAS CITY MO-KS MMA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Kansas City, MO-KS MMA	463	100.00	5.87	13.61	19.21	34.13	34.58	27.00	40.34	25.27	1.73	13.61	34.90	49.75

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: KANSAS CITY MO-KS MMA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Kansas City, MO-KS MMA	12	100.00	5.87	16.67	19.21	16.67	34.58	25.00	40.34	41.67	2.91	14.14	31.45	51.50

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														Geography: KANSAS CITY MO-KS MMA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:																					
Kansas City, MO-KS MMA	274	100.00	5.87	5.11	19.21	17.88	34.58	24.82	40.34	52.19	1.53	11.57	32.61	54.29							

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: KANSAS CITY MO-KS MMA		Evaluation Period: JANUARY 1, 2014 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-Scope Review:																	
Kansas City, MO–KS MMA	648	100.00	7.16	6.02	19.21	18.67	29.57	23.92	42.22	51.39	5.90	18.90	27.77	47.43			

* Based on 2015 Peer Small Business Data - US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: KANSAS CITY MO-KS MMA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
Kansas City, MO-KS MMA	1	100.00	3.57	0.00	15.24	100.00	36.96	0.00	43.82	0.00	.88	4.85	43.61	50.66

* Based on 2015 Peer Small Business Data - US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2016		Geography: KANSAS CITY MO-KS MMA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31,							
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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Kansas City, MO-KS MMA	463	100.00	20.27	35.86	17.16	26.06	20.96	16.26	41.62	21.83	11.36	23.35	25.43	39.87

* Based on 2015 Peer Mortgage Data - US

** 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 3.0 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: KANSAS CITY MO-KS MMA						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Kansas City, MO-KS MMA	12	100.00	20.27	8.33	17.16	41.67	20.96	16.67	41.62	33.33	7.89	17.38	24.94	49.79

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: KANSAS CITY MO-KS MMA				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp							
Full-Scope Review:																					
Kansas City, MO–KS MMA	274	100.00	20.27	13.69	17.16	20.53	20.96	24.71	41.62	41.06	8.31	17.71	25.33	48.65							

* Based on 2015 Peer Mortgage Data - US

** 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 4.0 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: KANSAS CITY MO-KS MMA			Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Kansas City, MO–KS MMA	669	100.00	77.34	55.90	77.88	10.61	11.51	29,078	13,194

* Based on 2015 Peer Small Business Data - US

** 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 - 2015).

**** 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 23.62 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: KANSAS CITY MO-KS MMA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Kansas City, MO–KS MMA	1	100.00	95.72	0.00	100.00	0.00	0.00	229	97

* Based on 2015 Peer Small Business Data - US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 100.0 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: KANSAS CITY MO-KS MMA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Kansas City, MO–KS MMA	13	5,023	57	2,229	70	7,252	0.77	5	807

* '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: KANSAS CITY MO-KS MMA												Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Kansas City, MO-KS MMA	100.00	11	100.00	9.09	0.00	36.36	54.55	0	0	0	0	0	0	9.13	22.59	32.61	35.66

Table 1. Lending Volume

LENDING VOLUME		Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016		
Assessment Area:	% 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-Scope Review:												
Minneapolis-St. Paul-Bloomington, MN-WI MMA	100.00	1,281	274,838	2,609	252,569	39	4,895	50	214,027	3,979	746,329	100.00
Statewide MN	NA	NA	NA	NA	NA	NA	NA	7	35,881	7	35,881	NA

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of December 31, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Minneapolis-St. Paul-Bloomington, MN-WI MMA	499	100.00	2.75	7.62	13.41	20.44	48.26	40.28	35.57	31.66	3.19	13.84	47.59	35.39

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MINNEAPOLIS--ST. PAUL-BLOOMINGTON, MN--WI MMA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Minneapolis-St. Paul-Bloomington, MN-WI MMA	46	100.00	2.75	0.00	13.41	10.87	48.26	47.83	35.57	41.30	2.96	12.79	47.89	36.37

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Minneapolis-St. Paul-Bloomington, MN-WI MMA	736	100.00	2.75	2.99	13.41	12.91	48.26	41.30	35.57	42.80	2.06	10.63	46.57	40.74

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Minneapolis-St. Paul-Bloomington, MN-WI MMA	2,609	100.00	4.93	6.59	15.11	14.37	43.77	44.15	36.17	34.88	4.02	14.24	42.67	39.07

* Based on 2015 Peer Small Business Data - US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS														Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms****	% BANK Loans	Low	Mod	Mid	Upp							
Full-Scope Review:																					
Minneapolis-St. Paul-Bloomington, MN-WI MMA	39	100.00	1.38	0.00	8.96	0.00	56.21	92.31	33.46	7.69	0.67	4.35	67.39	27.59							

* Based on 2015 Peer Small Business Data - US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA								Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Minneapolis-St. Paul-Bloomington, MN-WI MMA	499	100.00	19.04	20.17	17.31	23.74	22.77	22.27	40.88	33.82	12.74	27.26	25.57	34.43

* Based on 2015 Peer Mortgage Data - US

** 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 4.6 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA								Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Minneapolis-St. Paul-Bloomington, MN-WI MMA	46	100.00	19.04	13.95	17.31	25.58	22.77	23.26	40.88	37.21	8.70	22.25	25.80	43.25

* Based on 2015 Peer Mortgage Data - US

** 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 6.5 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Minneapolis-St. Paul-Bloomington, MN-WI MMA	736	100.00	19.04	11.24	17.31	19.80	22.77	23.31	40.88	45.65	8.42	20.45	26.48	44.66

* Based on 2015 Peer Mortgage Data - US

** 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 3.3 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Minneapolis-St. Paul-Bloomington, MN-WI MMA	2,609	100.00	79.73	59.52	78.19	10.73	11.08	67,216	34,474

* Based on 2015 Peer Small Business Data - US

** 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 - 2015).

**** 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 15.98 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016		
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Minneapolis-St. Paul-Bloomington, MN-WI MMA	39	100.00	96.51	76.92	53.85	35.90	10.26	602	332

* Based on 2015 Peer Small Business Data - US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 12.82 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MINNEAPOLIS–ST. PAUL-BLOOMINGTON, MN–WI MMA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full-Scope Review:										
Minneapolis-St. Paul-Bloomington, MN-WI MMA	22	19,608	106	22,711	128	42,319	4.52	13	12,294	
Statewide/Regional	2	1,320	0	0	2	1,320	0.14	1	451	

* '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-ST. PAUL-BLOOMINGTON, MN-WI MMA										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Minneapolis-St. Paul- Bloomington, MN-WI MMA	100.00	33	100.00	3.03	15.15	45.45	36.36	0	0	0	0	0	0	6.87	16.51	44.92	31.58

Table 1. Lending Volume

LENDING VOLUME		Geography: ST. LOUIS, MO-IL MMA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% 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-Scope Review:												
St. Louis, MO-IL MMA	100.00	472	77,016	776	84,586	4	868	19	67,214	1,271	229,684	100.00

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ST. LOUIS, MO-IL MMA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
St. Louis, MO-IL MMA	157	100.00	5.22	3.82	15.68	17.20	40.42	29.94	38.68	49.04	1.77	9.75	42.46	46.03

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: ST. LOUIS, MO-IL MMA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
St. Louis, MO-IL MMA	16	100.00	5.22	6.25	15.68	6.25	40.42	56.25	38.68	31.25	4.31	13.88	38.23	43.58

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: ST. LOUIS, MO-IL MMA Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
St. Louis, MO-IL MMA	299	100.00	5.22	2.01	15.68	14.05	40.42	37.79	38.68	46.15	1.45	8.70	38.16	51.69

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ST. LOUIS, MO-IL MMA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
St. Louis, MO-IL MMA	774	100.00	6.39	5.94	15.36	16.15	34.73	33.85	43.40	44.06	5.36	14.79	33.68	46.17

* Based on 2015 Peer Small Business Data - US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: ST. LOUIS, MO-IL MMA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms****	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
St. Louis, MO-IL MMA	4	100.00	2.12	0.00	11.65	50.00	43.16	0.00	42.99	50.00	1.12	4.87	47.94	46.07

* Based on 2015 Peer Small Business Data - US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ST. LOUIS, MO-IL MMA						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
St. Louis, MO-IL MMA	157	100.00	20.80	15.23	16.58	21.85	20.48	22.52	42.15	40.40	12.43	23.68	24.47	39.42

* Based on 2015 Peer Mortgage Data - US

** 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 3.8 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: ST. LOUIS, MO-IL MMA				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
St. Louis, MO-IL MMA	16	100.00	20.80	6.25	16.58	31.25	20.48	25.00	42.15	37.50	11.73	17.77	22.82	47.68

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ST. LOUIS, MO-IL MMA					Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
St. Louis, MO-IL MMA	299	100.00	20.80	10.18	16.58	23.51	20.48	22.81	42.15	43.51	8.15	17.70	24.48	49.67

* Based on 2015 Peer Mortgage Data - US

** 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 4.7 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ST. LOUIS, MO-IL MMA			Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
St. Louis, MO-IL MMA	776	100.00	76.93	57.73	73.20	14.05	12.76	41,266	18,816

* Based on 2015 Peer Small Business Data - US

** 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 - 2015).

**** 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 16.24 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ST. LOUIS, MO-IL MMA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
St. Louis, MO-IL MMA	4	100.00	96.01	100.00	0.00	50.00	50.00	267	145

* Based on 2015 Peer Small Business Data - US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ST. LOUIS, MO-IL MMA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full-Scope Review:										
St. Louis, MO-IL MMA	26	10,610	35	3,533	61	14,144	1.51	15	3,217	

* '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: ST. LOUIS, MO-IL MMA										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
St. Louis, MO-IL MMA	100.00	16	100.00	0.00	12.50	43.75	43.75	0	0	0	0	0	0	9.27	17.71	37.97	34.99

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF ARIZONA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% 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-Scope Review:												
Phoenix-Mesa-Scottsdale, AZ MSA	88.37	2,342	593,130	2,661	177,218	10	633	25	178,567	5,038	949,548	83.03
Limited-Scope Review:												
Prescott, AZ MSA	4.56	169	42,655	90	3,154	1	5	0	0	260	45,814	5.07
Tucson, AZ MSA	7.07	173	38,367	225	15,795	4	938	1	9,263	403	64,363	11.90
Statewide/Regional	NA	NA	NA	NA	NA	NA	NA	1	7,350	1	7,350	NA

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF ARIZONA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	843	87.36	3.61	3.08	20.72	20.17	35.76	31.44	39.91	45.31	2.04	15.64	38.63	43.69
Limited-Scope Review:														
Prescott, AZ MSA	61	6.32	0.00	0.00	11.57	8.20	68.19	54.10	20.24	37.70	0.00	10.22	72.82	16.96
Tucson, AZ MSA	61	6.32	3.46	3.28	22.02	21.31	37.37	27.87	37.15	47.54	1.87	13.85	37.74	46.55

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF ARIZONA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	84	82.35	3.61	1.19	20.72	22.62	35.76	28.57	39.91	47.62	1.68	11.52	35.17	51.63
Limited-Scope Review:														
Prescott, AZ MSA	12	11.76	0.00	0.00	11.57	16.67	68.19	58.33	20.24	25.00	0.00	8.10	68.57	23.33
Tucson, AZ MSA	6	5.88	3.46	16.67	22.02	0.00	37.37	16.67	37.15	66.67	2.62	15.47	30.28	51.64

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF ARIZONA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	1,414	87.50	3.61	2.62	20.72	19.02	35.76	34.09	39.91	44.27	1.43	11.55	36.43	50.59
Limited-Scope Review:														
Prescott, AZ MSA	96	5.94	0.00	0.00	11.57	6.25	68.19	67.71	20.24	26.04	0.00	9.78	68.18	22.04
Tucson, AZ MSA	106	6.56	3.46	0.94	22.02	8.49	37.37	36.79	37.15	53.77	1.68	13.62	34.82	49.88

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF ARIZONA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	2,640	89.34	6.48	10.61	15.34	15.68	29.60	25.53	47.97	48.18	7.34	15.09	28.02	49.56
Limited-Scope Review:														
Prescott, AZ MSA	90	3.05	0.00	0.00	17.84	11.11	56.16	57.78	26.00	31.11	0.00	16.49	57.30	26.21
Tucson, AZ MSA	225	7.61	5.78	2.67	25.02	28.00	30.25	37.33	38.95	32.00	5.19	24.51	30.10	40.20

* Based on 2015 Peer Small Business Data - US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF ARIZONA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	10	66.67	5.65	20.00	15.73	10.00	32.04	30.00	46.14	40.00	3.66	10.99	34.80	50.55
Limited-Scope Review:														
Prescott, AZ MSA	1	6.67	0.00	0.00	11.11	0.00	64.70	0.00	24.19	100.00	0.00	4.26	72.34	23.40
Tucson, AZ MSA	4	26.67	4.38	0.00	22.37	0.00	36.84	100.00	36.41	0.00	1.30	19.48	40.26	38.96

* Based on 2015 Peer Small Business Data - US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF ARIZONA					Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	844	87.37	20.93	11.98	17.44	18.22	20.15	16.75	41.48	53.06	6.37	20.66	25.00	47.97
Limited-Scope Review:														
Prescott, AZ MSA	61	6.31	18.52	1.64	20.31	18.03	20.86	9.84	40.31	70.49	4.87	17.98	27.16	49.99
Tucson, AZ MSA	61	6.31	21.62	12.07	17.84	17.24	19.62	13.79	40.92	56.90	7.47	21.29	24.89	46.35

* Based on 2015 Peer Mortgage Data - US

** 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 3.0 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF ARIZONA						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	84	82.35	20.93	10.71	17.44	19.05	20.15	14.29	41.48	55.95	6.82	15.11	21.15	56.92
Limited-Scope Review:														
Prescott, AZ MSA	12	11.76	18.52	8.33	20.31	16.67	20.86	25.00	40.31	50.00	11.06	16.58	29.65	42.71
Tucson, AZ MSA	6	5.88	21.62	0.00	17.84	33.33	19.62	16.67	40.92	50.00	7.53	16.35	20.98	55.14

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF ARIZONA					Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Phoenix-Mesa-Scottsdale, AZ MSA	1,414	87.50	20.93	13.57	17.44	19.04	20.15	17.36	41.48	50.04	7.09	17.19	23.35	52.36
Limited-Scope Review:														
Prescott, AZ MSA	96	5.94	18.52	3.19	20.31	13.83	20.86	13.83	40.31	69.15	6.73	17.74	27.05	48.48
Tucson, AZ MSA	106	6.56	21.62	2.91	17.84	16.50	19.62	24.27	40.92	56.31	10.98	15.79	22.17	51.06

* Based on 2015 Peer Mortgage Data - US

** 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 3.0 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF ARIZONA			Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Phoenix-Mesa-Scottsdale, AZ MSA	2,661	89.42	80.34	71.33	85.46	7.03	7.52	88,752	46,296
Limited-Scope Review:									
Prescott, AZ MSA	90	3.02	82.90	73.33	92.22	5.56	2.22	5,610	3,005
Tucson, AZ MSA	225	7.56	80.01	64.44	79.56	11.56	8.89	16,144	8,750

* Based on 2015 Peer Small Business Data - US

** 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 - 2015).

**** 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 7.90 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF ARIZONA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Phoenix-Mesa-Scottsdale, AZ MSA	10	66.67	93.89	80.00	90.00	0.00	10.00	284	123
Limited-Scope Review:									
Prescott, AZ MSA	1	6.67	97.67	100.00	100.00	0.00	0.00	51	19
Tucson, AZ MSA	4	26.67	96.26	0.00	25.00	25.00	50.00	79	37

* Based on 2015 Peer Small Business Data - US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF ARIZONA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Phoenix-Mesa-Scottsdale, AZ MSA	9	9,404	62	16,939	71	26,343	2.81	6	13,341
Limited-Scope Review:									
Prescott, AZ MSA	1	163	8	117	9	280	0.03	0	0
Tucson, AZ MSA	6	2,690	24	85	30	2,775	0.30	1	559
Statewide/Regional	3	722	2	390	5	1,112	0.12	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 ARIZONA												Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Phoenix-Mesa- Scottsdale, AZ MSA	83.03	41	82.00	0.00	24.39	41.46	31.71	0	1	0	0	-1	0	8.42	24.46	33.25	33.69
Limited-Scope Review:																	
Prescott, AZ MSA	5.07	3	6.00	0.00	66.67	0.00	33.33	0	0	0	0	0	0	0.00	15.17	67.84	16.98
Tucson, AZ MSA	11.90	6	12.00	0.00	16.67	50.00	33.33	0	1	0	0	0	-1	7.32	28.83	32.76	30.66

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% 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-Scope Review:												
North Port-Sarasota-Bradenton, FL MSA	31.39	366	99,838	590	34,516	13	1,303	5	4,400	974	140,057	56.32
Punta Gorda, FL MSA	2.96	55	7,770	36	3,403	0	0	1	700	92	11,873	4.51
Limited-Scope Review:												
Cape Coral-Fort Myers, FL MSA	9.12	161	51,051	120	14,447	0	0	2	37,500	283	102,998	3.60
Naples-Immokalee-Marco Island, FL MSA	9.47	191	97,675	101	9,167	0	0	2	300	294	107,142	19.32
Orlando-Kissimmee-Sanford, FL MSA	31.71	117	26,781	862	60,491	5	565	0	0	984	87,837	2.27
Tampa-St. Petersburg-Clearwater, FL MSA	10.73	51	9,000	276	23,182	2	30	4	8,350	333	40,562	9.13
West Palm Beach-Boca Raton-Delray Beach, FL MD	4.61	59	43,068	79	8,150	0	0	5	2,700	143	53,918	4.85
Statewide/Regional	NA	NA	NA	NA	NA	NA	NA	3	37,300	3	37,300	NA

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	218	34.38	1.26	1.38	20.07	11.47	48.99	38.53	29.68	48.62	0.37	12.16	51.16	36.30
Punta Gorda, FL MSA	39	6.15	0.00	0.00	6.26	2.56	76.48	76.92	17.26	20.51	0.00	4.76	78.61	16.62
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	125	19.72	1.32	0.00	14.17	9.60	55.62	36.80	28.89	53.60	1.21	12.18	54.61	32.01
Naples-Immokalee-Marco Island, FL MSA	128	20.19	2.40	0.78	16.42	7.03	46.03	50.00	35.15	42.19	2.16	15.01	51.80	31.03
Orlando-Kissimmee-Sanford, FL MSA	62	9.78	0.39	0.00	17.78	14.52	42.19	33.87	39.64	51.61	0.14	12.70	39.62	47.54
Tampa-St. Petersburg-Clearwater, FL MSA	29	4.57	3.23	0.00	18.89	13.79	36.80	20.69	41.09	65.52	1.88	13.77	35.99	48.36
West Palm Beach-Boca Raton-Delray Beach, FL MD	33	5.21	2.96	0.00	22.08	0.00	36.12	45.45	38.83	54.55	1.44	16.61	38.55	43.40

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	20	62.50	1.26	0.00	20.07	25.00	48.99	45.00	29.68	30.00	0.79	17.46	52.61	29.14
Punta Gorda, FL MSA	0	0.00	0.00	0.00	6.26	0.00	76.48	0.00	17.26	0.00	0.00	4.52	79.90	15.58
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	4	12.50	1.32	0.00	14.17	50.00	55.62	25.00	28.89	25.00	1.21	10.13	60.55	28.11
Naples-Immokalee-Marco Island, FL MSA	2	6.25	2.40	0.00	16.42	0.00	46.03	0.00	35.15	100.00	0.85	15.38	59.26	24.50
Orlando-Kissimmee-Sanford, FL MSA	3	9.38	0.39	0.00	17.78	0.00	42.19	66.67	39.64	33.33	0.35	15.04	38.51	46.10
Tampa-St. Petersburg-Clearwater, FL MSA	3	9.38	3.23	0.00	18.89	0.00	36.80	66.67	41.09	33.33	3.07	14.58	32.67	49.68
West Palm Beach-Boca Raton-Delray Beach, FL MD	0	0.00	2.96	0.00	22.08	0.00	36.12	0.00	38.83	0.00	1.35	14.38	36.47	47.80

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	128	38.32	1.26	1.56	20.07	20.31	48.99	40.63	29.68	37.50	0.39	11.77	50.09	37.74
Punta Gorda, FL MSA	16	4.79	0.00	0.00	6.26	0.00	76.48	68.75	17.26	31.25	0.00	3.07	76.98	19.95
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	32	9.58	1.32	0.00	14.17	3.13	55.62	37.50	28.89	59.38	0.39	9.20	56.02	34.39
Naples-Immokalee-Marco Island, FL MSA	61	18.26	2.40	0.00	16.42	6.56	46.03	45.90	35.15	47.54	1.35	13.01	51.64	34.01
Orlando-Kissimmee-Sanford, FL MSA	52	15.57	0.39	0.00	17.78	9.62	42.19	44.23	39.64	46.15	0.21	11.01	37.77	51.02
Tampa-St. Petersburg-Clearwater, FL MSA	19	5.69	3.23	5.26	18.89	10.53	36.80	47.37	41.09	36.84	1.83	11.53	33.01	53.63
West Palm Beach-Boca Raton-Delray Beach, FL MD	26	7.78	2.96	0.00	22.08	15.38	36.12	34.62	38.83	50.00	0.90	13.37	34.92	50.82

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	590	28.59	1.55	3.39	20.24	25.59	42.80	38.31	35.41	32.71	1.49	19.40	39.94	39.17
Punta Gorda, FL MSA	36	1.74	0.00	0.00	6.61	5.56	78.90	88.89	14.49	5.56	0.00	5.77	79.92	14.31
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	120	5.81	3.44	32.50	14.77	10.83	51.80	30.83	29.86	25.83	2.99	12.67	50.31	34.03
Naples-Immokalee-Marco Island, FL MSA	101	4.89	2.68	4.95	13.33	2.97	42.64	50.50	41.35	41.58	2.09	10.66	41.85	45.39
Orlando-Kissimmee-Sanford, FL MSA	862	41.76	0.62	0.93	21.10	29.81	37.24	25.87	41.04	43.39	0.61	19.64	36.04	43.72
Tampa-St. Petersburg-Clearwater, FL MSA	276	13.37	4.64	36.23	20.33	17.75	32.82	22.83	41.88	23.19	5.23	18.82	32.98	42.97
West Palm Beach-Boca Raton-Delray Beach, FL MD	79	3.83	3.57	2.53	18.88	25.32	31.75	32.91	45.56	39.24	3.53	16.83	31.25	48.40

* Based on 2015 Peer Small Business Data - US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	13	65.00	1.68	0.00	17.80	30.77	47.02	38.46	33.50	30.77	0.00	4.48	41.79	53.73
Punta Gorda, FL MSA	0	0.00	0.00	0.00	7.36	0.00	74.85	0.00	17.79	0.00	0.00	0.00	27.27	72.73
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	0	0.00	1.36	0.00	17.75	0.00	56.10	0.00	24.71	0.00	0.00	8.89	48.89	42.22
Naples-Immokalee-Marco Island, FL MSA	0	0.00	6.46	0.00	18.77	0.00	49.22	0.00	25.55	0.00	33.33	14.81	40.74	11.11
Orlando-Kissimmee-Sanford, FL MSA	5	25.00	0.57	0.00	18.27	0.00	43.18	0.00	37.97	100.00	0.00	10.34	50.57	39.08
Tampa-St. Petersburg-Clearwater, FL MSA	2	10.00	3.11	0.00	18.73	0.00	37.93	100.00	40.20	0.00	1.30	11.69	36.36	50.65
West Palm Beach-Boca Raton-Delray Beach, FL MD	0	0.00	4.15	0.00	21.50	0.00	30.05	0.00	44.23	0.00	4.55	6.36	20.00	69.09

* Based on 2015 Peer Small Business Data - US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	218	34.38	19.55	3.35	19.05	14.35	20.92	14.35	40.47	67.94	4.82	15.51	22.09	57.57
Punta Gorda, FL MSA	39	6.15	16.43	7.69	19.62	12.82	25.30	25.64	38.65	53.85	7.70	19.47	23.99	48.84
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	125	19.72	18.96	1.65	18.96	3.31	21.42	9.09	40.66	85.95	3.99	17.74	21.15	57.12
Naples-Immokalee-Marco Island, FL MSA	128	20.19	21.14	1.60	18.31	3.20	19.04	10.40	41.50	84.80	2.89	13.37	15.93	67.81
Orlando-Kissimmee-Sanford, FL MSA	62	9.78	19.37	6.67	18.20	20.00	20.36	8.33	42.07	65.00	4.43	17.01	23.59	54.96
Tampa-St. Petersburg-Clearwater, FL MSA	29	4.57	20.82	7.14	17.28	14.29	18.46	25.00	43.44	53.57	4.57	18.26	23.38	53.78
West Palm Beach-Boca Raton-Delray Beach, FL MD	33	5.21	21.50	3.13	17.84	0.00	18.93	9.38	41.73	87.50	3.83	16.22	22.06	57.90

* Based on 2015 Peer Mortgage Data - US

** 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 3.2 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	20	62.50	19.55	15.79	19.05	15.79	20.92	26.32	40.47	42.11	8.93	18.57	25.36	47.14
Punta Gorda, FL MSA	0	0.00	16.43	0.00	19.62	0.00	25.30	0.00	38.65	0.00	11.34	22.68	28.87	37.11
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	4	12.50	18.96	25.00	18.96	0.00	21.42	0.00	40.66	75.00	7.34	17.85	21.52	53.29
Naples-Immokalee-Marco Island, FL MSA	2	6.25	21.14	0.00	18.31	0.00	19.04	0.00	41.50	100.00	5.79	17.38	25.00	51.83
Orlando-Kissimmee-Sanford, FL MSA	3	9.38	19.37	33.33	18.20	0.00	20.36	33.33	42.07	33.33	11.85	14.57	19.04	54.54
Tampa-St. Petersburg-Clearwater, FL MSA	3	9.38	20.82	0.00	17.28	33.33	18.46	33.33	43.44	33.33	9.62	14.79	17.22	58.37
West Palm Beach-Boca Raton-Delray Beach, FL MD	0	0.00	21.50	0.00	17.84	0.00	18.93	0.00	41.73	0.00	6.55	13.92	21.59	57.93

* Based on 2015 Peer Mortgage Data - US

** 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 3.1 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
North Port-Sarasota-Bradenton, FL MSA	128	38.32	19.55	4.10	19.05	22.95	20.92	20.49	40.47	52.46	7.22	14.86	23.81	54.11
Punta Gorda, FL MSA	16	4.79	16.43	12.50	19.62	31.25	25.30	18.75	38.65	37.50	8.79	19.83	26.44	44.94
Limited-Scope Review:														
Cape Coral-Fort Myers, FL MSA	32	9.58	18.96	0.00	18.96	3.33	21.42	6.67	40.66	90.00	5.99	16.40	21.38	56.23
Naples-Immokalee-Marco Island, FL MSA	61	18.26	21.14	1.69	18.31	8.47	19.04	10.17	41.50	79.66	5.14	13.59	19.48	61.79
Orlando-Kissimmee-Sanford, FL MSA	52	15.57	19.37	4.00	18.20	14.00	20.36	4.00	42.07	78.00	6.13	13.58	21.54	58.75
Tampa-St. Petersburg-Clearwater, FL MSA	19	5.69	20.82	0.00	17.28	5.56	18.46	33.33	43.44	61.11	5.69	12.32	20.52	61.47
West Palm Beach-Boca Raton-Delray Beach, FL MD	26	7.78	21.50	8.00	17.84	4.00	18.93	20.00	41.73	68.00	5.54	12.79	21.88	59.79

* Based on 2015 Peer Mortgage Data - US

** 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 4.2 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 2014 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-Scope Review:										
North Port-Sarasota-Bradenton, FL MSA	590	28.59	83.52	74.58	86.61	6.95	6.44	19,746	10,904	
Punta Gorda, FL MSA	36	1.74	85.86	55.56	72.22	19.44	8.33	3,497	1,975	
Limited-Scope Review:										
Cape Coral-Fort Myers, FL MSA	120	5.81	82.35	21.67	68.33	24.17	7.50	16,088	8,764	
Naples-Immokalee-Marco Island, FL MSA	101	4.89	81.51	37.62	76.24	12.87	10.89	11,184	6,059	
Orlando-Kissimmee-Sanford, FL MSA	862	41.76	81.91	56.50	81.79	11.48	6.73	46,205	25,019	
Tampa-St. Petersburg-Clearwater, FL MSA	276	13.37	81.53	31.88	69.20	24.28	6.52	28,197	15,135	
West Palm Beach-Boca Raton-Delray Beach, FL MD	79	3.83	82.65	8.86	67.09	24.05	8.86	47,865	26,952	

* Based on 2015 Peer Small Business Data - US

** 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 - 2015).

**** 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 32.03 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016		
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
North Port-Sarasota-Bradenton, FL MSA	13	65.00	96.38	38.46	69.23	23.08	7.69	68	40
Punta Gorda, FL MSA	0	0.00	97.55	0.00	0.00	0.00	0.00	11	9
Limited-Scope Review:									
Cape Coral-Fort Myers, FL MSA	0	0.00	96.87	0.00	0.00	0.00	0.00	45	22
Naples-Immokalee-Marco Island, FL MSA	0	0.00	94.39	0.00	0.00	0.00	0.00	29	20
Orlando-Kissimmee-Sanford, FL MSA	5	25.00	95.93	100.00	80.00	0.00	20.00	91	51
Tampa-St. Petersburg-Clearwater, FL MSA	2	10.00	95.42	50.00	100.00	0.00	0.00	79	37
West Palm Beach-Boca Raton-Delray Beach, FL MD	0	0.00	96.14	0.00	0.00	0.00	0.00	111	54

* Based on 2015 Peer Small Business Data - US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 10.00 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
North Port-Sarasota-Bradenton, FL MSA	4	2,225	35	6,955	39	9,180	0.98	2	1,571
Punta Gorda, FL MSA	1	197	7	26	8	223	0.02	0	0
Limited-Scope Review:									
Cape Coral-Fort Myers, FL MSA	1	132	7	54	8	186	0.02	0	0
Naples-Immokalee-Marco Island, FL MSA	6	587	6	52	12	639	0.07	0	0
Orlando-Kissimmee-Sanford, FL MSA	5	3,651	12	60	17	3,711	0.40	3	1,046
Tampa-St. Petersburg-Clearwater, FL MSA	1	300	3	3,010	4	3,310	0.35	1	924
West Palm Beach-Boca Raton-Delray Beach, FL MD	2	48	29	282	31	330	0.04	1	62
Statewide/Regional	3	288	1	933	4	1,221	0.13	3	2,692

* '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 FLORIDA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
North Port-Sarasota-Bradenton, FL MSA	56.32	10	55.56	0.00	20.00	40.00	40.00	0	1	0	0	-1	0	2.67	23.45	46.77	27.11
Punta Gorda, FL MSA	4.51	1	5.56	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	7.06	76.70	16.23
Limited-Scope Review:																	
Cape Coral-Fort Myers, FL MSA	3.60	1	5.56	0.00	0.00	100.0	0.00	0	0	0	0	0	0	3.49	19.26	52.98	24.27
Naples-Immokalee-Marco Island, FL MSA	19.32	2	11.11	0.00	0.00	0.00	100.0	0	0	0	0	0	0	9.05	20.27	43.40	27.27
Orlando-Kissimmee-Sanford, FL MSA	2.27	0	0.00	0.00	0.00	0.00	0.00	0	14	0	-5	-4	-5	1.08	24.26	40.03	34.63
Tampa-St. Petersburg-Clearwater, FL MSA	9.13	3	16.67	0.00	0.00	0.00	100.0	0	0	0	0	0	0	6.12	23.79	34.78	34.89
West Palm Beach-Boca Raton-Delray Beach, FL MD	4.85	1	5.56	0.00	0.00	0.00	100.0	0	0	0	0	0	0	4.88	26.01	33.30	35.59

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF ILLINOIS												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area:	% 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-Scope Review:												
Rockford, IL MSA	100.00	439	37,105	588	40,263	49	8,059	12	34,082	1,088	119,509	100.00
Statewide/Regional	NA	NA	NA	NA	NA	NA	NA	2	5,700	2	5,700	NA

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF ILLINOIS					Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Rockford, IL MSA	171	100.00	4.00	2.34	19.24	15.20	45.61	51.46	31.16	30.99	1.74	14.63	48.11	35.51

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Rockford, IL MSA	26	100.00	4.00	0.00	19.24	23.08	45.61	61.54	31.16	15.38	2.26	16.87	49.79	31.07

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF ILLINOIS						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Rockford, IL MSA	242	100.00	4.00	2.48	19.24	18.60	45.61	41.32	31.16	37.60	1.16	12.93	47.52	38.39

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF ILLINOIS								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Rockford, IL MSA	587	100.00	6.22	9.37	19.67	19.93	45.68	44.12	28.00	26.58	5.49	16.90	46.85	30.76

* Based on 2015 Peer Small Business Data - US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
Rockford, IL MSA	49	100.00	1.73	0.00	9.91	0.00	55.76	75.51	32.37	24.49	0.00	0.98	56.86	42.16

* Based on 2015 Peer Small Business Data - US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF ILLINOIS						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Rockford, IL MSA	171	100.00	21.62	14.11	17.49	28.83	21.84	34.36	39.06	22.70	13.60	29.84	24.01	32.55

* Based on 2015 Peer Mortgage Data - US

** 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 4.7 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF ILLINOIS					Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Rockford, IL MSA	26	100.00	21.62	19.23	17.49	11.54	21.84	15.38	39.06	53.85	9.21	22.59	26.97	41.23

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF ILLINOIS						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Rockford, IL MSA	242	100.00	21.62	11.06	17.49	22.98	21.84	31.06	39.06	34.89	9.76	20.08	26.44	43.72

* Based on 2015 Peer Mortgage Data - US

** 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 2.9 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Rockford, IL MSA	588	100.00	75.59	79.59	85.88	5.78	8.33	3,687	1,620

* Based on 2015 Peer Small Business Data - US

** 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 - 2015).

**** 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 4.08 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Rockford, IL MSA	49	100.00	97.24	48.98	42.86	44.90	12.24	102	49

* Based on 2015 Peer Small Business Data - US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.12 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Rockford, IL MSA	5	3,455	68	7,587	73	11,042	1.18	2	6,127
Statewide/Regional	12	1,523	3	358	15	1,880	0.20	1	89

* '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, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Rockford, IL MSA	100.00	11	100.00	18.18	27.27	36.36	18.18	0	2	0	0	0	-2	8.23	22.66	42.71	26.40

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF INDIANA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% 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-Scope Review:												
Indianapolis-Carmel-Anderson, IN MSA	91.93	1,615	210,788	2,306	199,004	32	3,956	34	151,162	3,987	564,910	89.97
Limited-Scope Review:												
Kokomo, IN MSA	5.33	155	11,398	70	5,050	4	405	2	21,080	231	37,933	6.73
Non-MSA IN	2.74	74	5,687	34	3,525	9	127	2	34,000	119	43,339	3.40
Greater IN	NA	NA	NA	NA	NA	NA	NA	2	7,330	2	7,330	NA

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	591	86.91	5.43	4.40	19.52	23.18	38.12	34.18	36.93	38.24	1.97	13.98	37.54	46.51
Limited-Scope Review:														
Kokomo, IN MSA	60	8.82	0.00	0.00	25.42	30.00	36.06	48.33	38.52	21.67	0.00	19.94	37.69	42.37
Non-MSA IN	29	4.26	0.00	0.00	21.97	24.14	60.13	72.41	17.90	3.45	0.00	16.00	64.29	19.71

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF INDIANA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	62	84.93	5.43	1.61	19.52	19.35	38.12	50.00	36.93	29.03	2.77	13.90	37.99	45.33
Limited-Scope Review:														
Kokomo, IN MSA	6	8.22	0.00	0.00	25.42	50.00	36.06	0.00	38.52	50.00	0.00	29.67	29.67	40.66
Non-MSA IN	5	6.85	0.00	0.00	21.97	20.00	60.13	80.00	17.90	0.00	0.00	18.88	65.73	15.38

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF INDIANA						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	962	88.18	5.43	1.66	19.52	16.74	38.12	40.85	36.93	40.75	1.73	11.58	36.13	50.56
Limited-Scope Review:														
Kokomo, IN MSA	89	8.16	0.00	0.00	25.42	17.98	36.06	41.57	38.52	40.45	0.00	16.86	37.25	45.88
Non-MSA IN	40	3.67	0.00	0.00	21.97	5.00	60.13	67.50	17.90	27.50	0.00	14.78	63.65	21.57

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	2,302	95.68	5.36	4.78	20.05	17.94	37.57	35.75	36.99	41.53	5.48	17.50	36.00	41.02
Limited-Scope Review:														
Kokomo, IN MSA	70	2.91	0.00	0.00	36.70	34.29	31.74	22.86	31.57	42.86	0.00	33.50	30.79	35.71
Non-MSA IN	34	1.41	0.00	0.00	24.95	20.59	58.31	58.82	16.74	20.59	0.00	23.20	55.88	20.93

* Based on 2015 Peer Small Business Data – US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STATE OF INDIANA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	32	71.11	2.38	3.13	10.44	0.00	53.46	59.38	33.70	37.50	0.76	4.04	67.17	28.03
Limited-Scope Review:														
Kokomo, IN MSA	4	8.89	0.00	0.00	5.83	0.00	26.69	25.00	67.48	75.00	0.00	0.93	21.50	77.57
Non-MSA IN	9	20.00	0.00	0.00	3.66	0.00	73.99	44.44	22.34	55.56	0.00	0.00	62.78	37.22

* Based on 2015 Peer Small Business Data – US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF INDIANA						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	591	86.91	21.36	20.57	17.21	29.61	20.42	16.67	41.01	33.16	12.73	25.54	23.27	38.45
Limited-Scope Review:														
Kokomo, IN MSA	60	8.82	21.69	13.56	16.63	25.42	20.91	28.81	40.77	32.20	9.23	29.76	28.03	32.98
Non-MSA IN	29	4.26	19.34	19.23	19.22	53.85	22.42	15.38	39.02	11.54	12.86	33.45	25.94	27.76

* Based on 2015 Peer Mortgage Data - US

** 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 4.6 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	62	84.93	21.36	20.97	17.21	22.58	20.42	25.81	41.01	30.65	9.21	18.45	24.73	47.62
Limited-Scope Review:														
Kokomo, IN MSA	6	8.22	21.69	16.67	16.63	16.67	20.91	0.00	40.77	66.67	6.82	21.59	25.00	46.59
Non-MSA IN	5	6.85	19.34	40.00	19.22	20.00	22.42	20.00	39.02	20.00	12.50	23.53	25.74	38.24

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF INDIANA					Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Indianapolis-Carmel-Anderson, IN MSA	962	88.18	21.36	14.50	17.21	25.03	20.42	24.17	41.01	36.31	9.05	19.44	23.53	47.98
Limited-Scope Review:														
Kokomo, IN MSA	89	8.16	21.69	13.48	16.63	19.10	20.91	31.46	40.77	35.96	7.48	23.42	25.91	43.19
Non-MSA IN	40	3.67	19.34	10.00	19.22	37.50	22.42	22.50	39.02	30.00	11.02	21.86	28.31	38.81

* Based on 2015 Peer Mortgage Data - US

** 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 2.8 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF INDIANA			Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Indianapolis-Carmel-Anderson, IN MSA	2,306	95.68	76.81	68.43	80.49	9.02	10.49	26,497	11,022
Limited-Scope Review:									
Kokomo, IN MSA	70	2.90	76.97	77.14	82.86	10.00	7.14	836	421
Non-MSA IN	34	1.41	77.05	67.65	73.53	8.82	17.65	990	456

* Based on 2015 Peer Small Business Data – US

** 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 - 2015).

**** 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 10.41 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF INDIANA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Indianapolis-Carmel-Anderson, IN MSA	32	71.11	97.05	65.63	59.38	25.00	15.63	399	202
Limited-Scope Review:									
Kokomo, IN MSA	4	8.89	99.08	50.00	50.00	50.00	0.00	107	66
Non-MSA IN	9	20.00	99.15	100.00	100.00	0.00	0.00	356	223

* Based on 2015 Peer Small Business Data – US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.67 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Indianapolis-Carmel-Anderson, IN MSA	8	9,523	104	32,890	112	42,413	4.53	6	5,849
Limited-Scope Review:									
Kokomo, IN MSA		0	4	663	4	663	0.07	1	540
Non-MSA IN	0	0	5	21	5	21	0.00	0	0
Greater IN	14	5,360	9	5,395	23	10,755	1.15	3	637

* '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 INDIANA												Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																		
Indianapolis-Carmel-Anderson, IN MSA	89.97	38	86.36	0.00	26.32	34.21	39.47	0	0	0	0	0	0	8.52	24.50	34.80	31.99	
Limited-Scope Review:																		
Kokomo, IN MSA	6.73	4	9.09	0.00	50.00	25.00	25.00	0	1	0	-1	0	0	0.00	32.05	32.49	35.46	
Non-MSA IN	3.40	2	4.55	0.00	0.00	100.0	0.00	0	4	0	-2	-1	-1	0.00	27.12	57.28	15.60	

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF KANSAS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% 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-Scope Review:												
Non-MSA KS	100.00	33	2,775	31	1,080	0	0	0	0	64	3,855	100.00

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Non-MSA KS	16	100.00	0.00	0.00	10.12	12.50	76.10	75.00	13.77	12.50	0.00	9.70	74.12	16.17

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF KANSAS					Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Non-MSA KS	3	100.00	0.00	0.00	10.12	0.00	76.10	66.67	13.77	33.33	0.00	16.67	70.83	12.50

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF KANSAS						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Non-MSA KS	14	100.00	0.00	0.00	10.12	21.43	76.10	57.14	13.77	21.43	0.00	10.05	68.95	21.00

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF KANSAS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending (%) by Tract Income*			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies					
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
Non-MSA KS	31	100.00	0.00	0.00	25.56	32.26	59.12	48.39	15.32	19.35	0.00	22.91	61.08	16.01

* Based on 2015 Peer Small Business Data – US

** 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF KANSAS					Evaluation Period: JANUARY 1, 2014 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 ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Non-MSA KS	16	100.00	20.01	0.00	20.53	46.67	21.00	13.33	38.46	40.00	7.02	21.05	26.67	45.26

* Based on 2015 Peer Mortgage Data - US

** 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 6.3 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF KANSAS					Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Non-MSA KS	3	100.00	20.01	0.00	20.53	0.00	21.00	33.33	38.46	66.67	20.45	27.27	29.55	22.73

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Non-MSA KS	14	100.00	20.01	14.29	20.53	28.57	21.00	14.29	38.46	42.86	8.05	15.52	30.46	45.98

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF KANSAS			Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Non-MSA KS	31	100.00	72.41	70.97	87.10	9.68	3.23	414	179

* Based on 2015 Peer Small Business Data – US

** 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 - 2015).

**** 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 9.68 percent of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Non-MSA KS	0	0	8	1,734	8	1,734	0.19	0	0
Statewide/Regional	4	775	0	0	4	775	0.08	1	369

* '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 KANSAS										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Non-MSA KS	100.00	2	100.0	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	11.76	69.19	19.06

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF MISSOURI						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% 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-Scope Review:												
St. Joseph, MO-KS MSA	100.00	42	4,733	23	1,929	0	0	2	42,700	67	49,362	100.00

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF MISSOURI					Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
St. Joseph, MO-KS MSA	24	100.00	0.00	0.00	10.66	4.17	65.87	54.17	23.46	41.67	0.00	5.96	63.69	30.35

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF MISSOURI				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
St. Joseph, MO-KS MSA	18	100.00	0.00	0.00	10.66	0.00	65.87	72.22	23.46	27.78	0.00	7.31	65.26	27.43

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF MISSOURI				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				Aggregate Lending (%) by Tract Income*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans				
Full-Scope Review:														
St. Joseph, MO-KS MSA	23	100.00	0.00	0.00	16.30	8.70	62.99	52.17	20.71	39.13	0.00	16.16	60.22	23.62

* Based on 2015 Peer Small Business Data – US

** 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF MISSOURI				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
St. Joseph, MO-KS MSA	24	100.00	18.90	13.04	18.32	47.83	22.83	17.39	39.95	21.74	11.59	30.90	25.69	31.82

* Based on 2015 Peer Mortgage Data - US

** 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 4.2 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF MISSOURI				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
St. Joseph, MO-KS MSA	18	100.00	18.90	5.56	18.32	33.33	22.83	16.67	39.95	44.44	10.59	21.55	23.28	44.58

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF MISSOURI			Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
St. Joseph, MO-KS MSA	23	100.00	74.23	34.78	78.26	17.39	4.35	1,209	513

* Based on 2015 Peer Small Business Data – US

** 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 - 2015).

**** 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 39.13 percent of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF MISSOURI				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
St. Joseph, MO-KS MSA	1	456	4	20	5	476	0.05	0	0
Statewide/Regional	2	43	1	26	3	69	0.01	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 MISSOURI												Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
St. Joseph, MO-KS MSA	100.00	1	100.0	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	14.46	64.32	21.22

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF WASHINGTON												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area:	% 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-Scope Review:												
Seattle-Bellevue-Everett, WA MD	100.00	59	26,528	167	18,328	0	0	4	4,302	230	49,158	100.00

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF WASHINGTON						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Seattle-Bellevue-Everett, WA MD	28	100.00	1.72	14.29	13.22	21.43	47.34	25.00	37.72	39.29	2.00	12.83	48.10	37.07

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF WASHINGTON				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Seattle-Bellevue-Everett, WA MD	3	100.00	1.72	0.00	13.22	66.67	47.34	0.00	37.72	33.33	0.96	12.18	48.04	38.83

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF WASHINGTON				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****				
Full-Scope Review:														
Seattle-Bellevue-Everett, WA MD	28	100.00	1.72	3.57	13.22	21.43	47.34	42.86	37.72	32.14	1.62	11.32	46.85	40.21

* Based on 2015 Peer Mortgage Data - US

** 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: STATE OF WASHINGTON		Evaluation Period: JANUARY 1, 2014 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-Scope Review:																			
Seattle-Bellevue-Everett, WA MD	167	100.00	4.92	9.58	14.64	11.98	43.21	71.26	37.06	7.19	5.35	14.57	43.54	36.54					

* Based on 2015 Peer Small Business Data – US

** 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF WASHINGTON						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Seattle-Bellevue-Everett, WA MD	28	100.00	19.98	14.81	16.95	14.81	21.06	7.41	42.02	62.96	4.12	15.82	22.40	57.66

* Based on 2015 Peer Mortgage Data - US

** 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 3.6 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF WASHINGTON				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Seattle-Bellevue-Everett, WA MD	3	100.00	19.98	0.00	16.95	33.33	21.06	0.00	42.02	66.67	5.38	15.49	25.28	53.86

* Based on 2015 Peer Mortgage Data - US

** 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 0.0 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: STATE OF WASHINGTON				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp							
Full-Scope Review:																					
Seattle-Bellevue-Everett, WA MD	28	100.00	19.98	18.52	16.95	18.52	21.06	0.00	42.02	62.96	4.67	14.28	24.09	56.96							

* Based on 2015 Peer Mortgage Data - US

** 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 3.6 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF WASHINGTON			Evaluation Period: JANUARY 1, 2014 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-Scope Review:									
Seattle-Bellevue-Everett, WA MD	167	100.00	80.65	4.79	70.66	19.16	10.18	53,690	26,844

* Based on 2015 Peer Small Business Data – US

** 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 - 2015).

**** 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 94.61 percent of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF WASHINGTON				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Seattle-Bellevue- Everett, WA MD	5	738	6	109	11	847	0.09	2	66

* '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 WASHINGTON										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Seattle-Bellevue- Everett, WA MD	100.00	1	100.0	0.00	0.00	100.0	0.00	0	0	0	0	0	0	4.59	17.79	46.05	31.27

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF WISCONSIN												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area:	% 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-Scope Review:												
Milwaukee-Waukesha-West Allis, WI MSA	33.83	4,587	773,559	5,784	778,047	90	14,167	123	352,291	10,584	1,918,064	49.78
Madison, WI MSA	10.60	1,387	293,221	1,635	142,616	267	38,493	28	132,865	3,317	607,195	14.73
Wausau, WI MSA	2.96	411	46,777	370	32,118	138	13,422	6	10,344	925	102,661	3.76
Limited-Scope Review:												
Appleton, WI MSA	5.34	709	101,504	697	81,365	257	28,439	8	8,800	1,671	220,108	5.18
Duluth, WI MSA	0.33	51	4,029	51	7,312	0	0	0	0	102	11,341	0.45
Eau Claire, WI MSA	1.72	169	20,089	237	35,982	132	27,715	1	836	539	84,622	1.63
Fond du Lac, WI MSA	1.83	315	35,134	156	18,645	96	11,778	6	7,066	573	66,124	0.85
Green Bay, WI MSA	6.34	890	106,863	880	86,670	203	29,587	12	28,262	1,985	251,382	4.98
Janesville, WI MSA	4.16	520	51,713	616	61,910	153	27,726	11	22,118	1,300	163,467	2.55
La Crosse, WI MSA	0.86	101	9,389	146	16,331	22	3,905	1	3,150	270	32,775	0.60
Oshkosh, WI MSA	2.12	326	44,487	286	28,096	44	3,786	6	6,294	662	77,025	0.76
Racine, WI MSA	2.65	366	42,400	420	53,770	30	3,851	12	15,444	828	115,465	1.78
Sheboygan, WI MSA	1.84	326	41,265	224	16,636	19	2,321	6	4,478	575	64,700	0.98
Non-MSA WI	25.53	3,125	374,956	2,907	288,265	1,892	263,600	31	35,793	7,955	962,614	11.96
Statewide/Regional	NA	NA	NA	NA	NA	NA	NA	7	12,405	7	12,405	NA

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

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF WISCONSIN					Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Milwaukee-Waukesha-West Allis, WI MSA	1,617	35.56	6.74	5.88	12.89	20.22	39.84	36.86	40.52	37.04	2.60	10.15	42.46	44.78
Madison, WI MSA	535	11.77	1.41	1.68	10.88	8.60	63.05	55.33	24.67	34.39	1.01	9.29	61.57	28.14
Wausau, WI MSA	180	3.96	0.00	0.00	13.86	23.89	75.82	60.56	10.32	15.56	0.00	12.41	73.44	14.15
Limited-Scope Review:														
Appleton, WI MSA	242	5.32	0.00	0.00	6.20	7.85	75.79	65.70	18.01	26.45	0.00	5.63	72.38	21.99
Duluth, WI MSA	8	0.18	2.33	0.00	15.49	50.00	82.19	50.00	0.00	0.00	0.97	14.56	84.47	0.00
Eau Claire, WI MSA	67	1.47	0.00	0.00	11.92	10.45	73.51	76.12	14.57	13.43	0.00	10.43	75.27	14.30
Fond du Lac, WI MSA	148	3.25	0.00	0.00	6.15	9.46	85.44	80.41	8.42	10.14	0.00	6.09	84.31	9.60
Green Bay, WI MSA	255	5.61	0.73	0.00	20.16	25.10	55.51	42.75	23.61	32.16	0.58	18.40	49.83	31.20
Janesville, WI MSA	152	3.34	4.55	4.61	15.66	12.50	55.87	51.32	23.92	31.58	2.74	13.79	54.91	28.55
La Crosse, WI MSA	51	1.12	0.66	0.00	4.94	0.00	74.53	80.39	19.87	19.61	1.25	5.39	75.23	18.14
Oshkosh, WI MSA	128	2.82	0.00	0.00	10.85	17.19	69.87	57.03	19.27	25.78	0.00	11.06	66.21	22.73
Racine, WI MSA	131	2.88	2.21	1.53	10.75	24.43	54.91	44.27	32.13	29.77	0.80	8.13	58.77	32.31
Sheboygan, WI MSA	114	2.51	0.00	0.00	18.68	20.18	73.40	75.44	7.92	4.39	0.00	19.14	70.84	10.02
Non-MSA WI	919	20.21	0.00	0.00	7.59	10.34	74.68	71.38	17.23	18.28	0.00	7.33	71.72	20.96

* Based on 2015 Peer Mortgage Data - US

** 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Milwaukee-Waukesha-West Allis, WI MSA	127	26.68	6.74	6.30	12.89	10.24	39.84	37.80	40.52	45.67	5.96	11.63	39.84	42.58
Madison, WI MSA	34	7.14	1.41	0.00	10.88	17.65	63.05	50.00	24.67	32.35	1.66	9.60	63.91	24.83
Wausau, WI MSA	9	1.89	0.00	0.00	13.86	22.22	75.82	77.78	10.32	0.00	0.00	10.18	79.90	9.92
Limited-Scope Review:														
Appleton, WI MSA	20	4.20	0.00	0.00	6.20	5.00	75.79	85.00	18.01	10.00	0.00	7.42	72.04	20.54
Duluth, WI MSA	7	1.47	2.33	0.00	15.49	28.57	82.19	71.43	0.00	0.00	0.87	15.65	83.48	0.00
Eau Claire, WI MSA	10	2.10	0.00	0.00	11.92	0.00	73.51	60.00	14.57	40.00	0.00	11.52	75.12	13.36
Fond du Lac, WI MSA	8	1.68	0.00	0.00	6.15	12.50	85.44	87.50	8.42	0.00	0.00	5.73	84.58	9.69
Green Bay, WI MSA	31	6.51	0.73	0.00	20.16	19.35	55.51	61.29	23.61	19.35	0.54	17.57	51.63	30.25
Janesville, WI MSA	38	7.98	4.55	7.89	15.66	5.26	55.87	63.16	23.92	23.68	4.04	12.11	59.64	24.22
La Crosse, WI MSA	2	0.42	0.66	0.00	4.94	0.00	74.53	50.00	19.87	50.00	1.34	6.15	72.19	20.32
Oshkosh, WI MSA	12	2.52	0.00	0.00	10.85	25.00	69.87	41.67	19.27	33.33	0.00	11.91	67.42	20.67
Racine, WI MSA	9	1.89	2.21	0.00	10.75	11.11	54.91	33.33	32.13	55.56	3.02	8.54	53.27	35.18
Sheboygan, WI MSA	17	3.57	0.00	0.00	18.68	17.65	73.40	82.35	7.92	0.00	0.00	16.17	75.75	8.08
Non-MSA WI	152	31.93	0.00	0.00	7.59	17.11	74.68	73.68	17.73	9.21	0.00	9.02	74.84	16.14

* Based on 2015 Peer Mortgage Data - US

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2014 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-Scope Review:																					
Milwaukee-Waukesha-West Allis, WI MSA	2,840	34.43	6.74	2.43	12.89	8.13	39.84	41.02	40.52	48.42	2.53	7.84	39.50	50.13							
Madison, WI MSA	818	9.92	1.41	0.61	10.88	10.51	63.05	57.21	24.67	31.66	0.82	8.86	61.64	28.68							
Wausau, WI MSA	221	2.68	0.00	0.00	13.86	14.03	75.82	80.54	10.32	5.43	0.00	12.34	76.08	11.58							
Limited-Scope Review:																					
Appleton, WI MSA	446	5.41	0.00	0.00	6.20	5.83	75.79	69.73	18.01	24.44	0.00	5.02	71.36	23.62							
Duluth, WI MSA	36	0.44	2.33	0.00	15.49	19.44	82.19	80.56	0.00	0.00	2.43	14.95	82.62	0.00							
Eau Claire, WI MSA	92	1.12	0.00	0.00	11.92	10.87	73.51	73.91	14.57	15.22	0.00	11.43	76.02	12.55							
Fond du Lac, WI MSA	159	1.93	0.00	0.00	6.15	1.89	85.44	93.71	8.42	4.40	0.00	4.86	85.33	9.80							
Green Bay, WI MSA	604	7.32	0.73	0.33	20.16	21.36	55.51	50.00	23.61	28.31	0.34	17.86	50.46	31.33							
Janesville, WI MSA	329	3.99	4.55	4.86	15.66	7.29	55.87	55.02	23.92	32.83	2.62	10.93	54.63	31.82							
La Crosse, WI MSA	48	0.58	0.66	0.00	4.94	4.17	74.53	85.42	19.87	10.42	1.24	6.14	75.90	16.72							
Oshkosh, WI MSA	186	2.25	0.00	0.00	10.85	7.53	69.87	66.67	19.27	25.81	0.00	9.96	69.25	20.79							
Racine, WI MSA	226	2.74	2.21	0.00	10.75	4.87	54.91	56.64	32.13	38.50	0.64	7.47	52.82	39.07							
Sheboygan, WI MSA	195	2.36	0.00	0.00	18.68	15.90	73.40	79.49	7.92	4.62	0.00	18.05	72.79	9.15							
Non-MSA WI	2,049	24.84	0.00	0.00	7.59	8.98	74.68	75.89	17.73	15.13	0.00	6.75	71.93	21.32							

* Based on 2015 Peer Mortgage Data - US

** 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 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF WISCONSIN						Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Milwaukee-Waukesha-West Allis, WI MSA	3	27.27	15.39	0.00	15.91	0.00	45.42	100.00	23.28	0.00	15.70	23.04	41.52	19.75
Madison, WI MSA	0	0.00	14.15	0.00	18.71	0.00	47.19	0.00	19.95	0.00	12.11	17.89	55.79	14.21
Wausau, WI MSA	1	9.09	0.00	0.00	22.79	0.00	58.02	100.00	19.20	0.00	0.00	22.73	63.64	13.64
Limited-Scope Review:														
Appleton, WI MSA	1	9.09	0.00	0.00	14.90	0.00	79.35	0.00	5.75	100.00	0.00	8.70	86.96	4.35
Duluth, WI MSA	0	0.00	21.33	0.00	27.11	0.00	51.56	0.00	0.00	0.00	20.00	6.67	73.33	0.00
Eau Claire, WI MSA	0	0.00	0.00	0.00	15.41	0.00	65.47	0.00	19.11	0.00	0.00	6.90	65.52	27.59
Fond du Lac, WI MSA	0	0.00	0.00	0.00	40.14	0.00	55.33	0.00	4.53	0.00	0.00	23.81	71.43	4.76
Green Bay, WI MSA	0	0.00	1.92	0.00	27.44	0.00	56.40	0.00	14.24	0.00	0.00	41.67	41.67	16.67
Janesville, WI MSA	1	9.09	11.54	0.00	22.44	100.00	38.68	0.00	27.34	0.00	6.06	18.18	48.48	27.27
La Crosse, WI MSA	0	0.00	12.55	0.00	32.38	0.00	47.00	0.00	8.07	0.00	18.18	38.64	34.09	9.09
Oshkosh, WI MSA	0	0.00	0.00	0.00	27.85	0.00	58.95	0.00	13.20	0.00	0.00	21.43	78.57	0.00
Racine, WI MSA	0	0.00	2.28	0.00	21.88	0.00	49.57	0.00	26.27	0.00	0.00	36.67	50.00	13.33
Sheboygan, WI MSA	0	0.00	0.00	0.00	41.94	0.00	52.40	0.00	5.66	0.00	0.00	57.89	36.84	5.26
Non-MSA WI	5	45.45	0.00	0.00	11.11	0.00	75.99	100.00	12.90	0.00	0.00	7.74	79.35	12.90

* Based on 2015 Peer Mortgage Data - US

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF WISCONSIN					Evaluation Period: JANUARY 1, 2014 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-Scope Review:														
Milwaukee-Waukesha-West Allis, WI MSA	5,783	40.14	9.02	7.68	13.85	12.19	38.82	36.45	38.28	43.68	6.05	10.52	36.97	46.46
Madison, WI MSA	1,635	11.35	3.76	3.79	13.50	15.11	56.88	53.46	25.25	27.65	3.62	12.16	57.46	26.77
Wausau, WI MSA	370	2.57	0.00	0.00	17.82	14.86	67.05	68.11	15.13	17.03	0.00	14.45	66.12	19.43
Limited-Scope Review:														
Appleton, WI MSA	697	4.84	0.00	0.00	11.02	17.93	76.48	70.73	12.49	11.33	0.00	11.28	73.52	15.20
Duluth, WI MSA	51	0.35	15.92	43.14	15.21	11.76	68.86	45.10	0.00	0.00	24.87	13.37	61.76	0.00
Eau Claire, WI MSA	237	1.64	0.00	0.00	14.78	8.02	71.99	81.01	13.23	10.97	0.00	13.93	70.17	15.90
Fond du Lac, WI MSA	156	1.08	0.00	0.00	18.74	15.38	75.49	80.13	5.77	4.49	0.00	13.46	78.51	8.03
Green Bay, WI MSA	880	6.11	1.21	1.02	20.92	24.20	54.66	52.39	23.20	22.39	0.74	18.55	53.81	26.90
Janesville, WI MSA	616	4.28	7.47	7.95	18.96	17.69	45.88	40.91	27.69	33.44	6.07	15.27	46.15	32.50
La Crosse, WI MSA	146	1.01	3.38	1.37	22.01	13.01	60.72	67.81	13.89	17.81	2.75	19.51	59.84	17.89
Oshkosh, WI MSA	286	1.99	0.00	0.00	15.46	9.79	66.01	65.03	18.53	25.17	0.00	14.04	66.63	19.33
Racine, WI MSA	420	2.92	3.60	5.95	10.93	14.05	55.07	43.10	30.41	36.90	4.46	8.99	53.17	33.38
Sheboygan, WI MSA	224	1.55	0.00	0.00	30.20	35.27	62.28	57.14	7.52	7.59	0.00	26.59	64.79	8.62
Non-MSA WI	2,907	20.18	0.00	0.00	8.31	7.77	75.55	73.44	16.14	18.78	0.00	6.96	73.45	19.59

* Based on 2015 Peer Small Business Data – US

** 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF WISCONSIN						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Low	Mod	Mid	Upp
Full-Scope Review:														
Milwaukee-Waukesha-West Allis, WI MSA	90	2.69	3.00	0.00	7.17	0.00	43.84	40.00	46.00	60.00	2.00	1.33	41.33	55.33
Madison, WI MSA	267	7.99	0.28	0.37	10.02	7.49	70.28	77.90	19.26	14.23	0.00	7.24	80.50	12.26
Wausau, WI MSA	138	4.13	0.00	0.00	11.22	7.25	79.83	87.68	8.95	5.07	0.00	5.60	91.20	3.20
Limited-Scope Review:														
Appleton, WI MSA	257	7.69	0.00	0.00	4.21	2.33	79.41	91.44	16.38	6.23	0.00	2.74	87.67	9.59
Duluth, WI MSA	0	0.00	4.44	0.00	11.11	0.00	84.44	0.00	0.00	0.00	0.00	0.00	100.00	0.00
Eau Claire, WI MSA	132	3.95	0.00	0.00	12.77	9.85	75.39	74.24	11.84	15.91	0.00	9.03	76.77	14.19
Fond du Lac, WI MSA	96	2.87	0.00	0.00	2.57	0.00	87.50	98.96	9.93	1.04	0.00	2.50	83.75	13.75
Green Bay, WI MSA	203	6.07	0.30	0.00	13.75	7.39	64.06	74.88	21.88	17.73	0.00	11.11	70.37	18.52
Janesville, WI MSA	153	4.58	1.10	0.65	4.86	1.31	70.22	71.90	23.82	26.14	0.62	3.11	81.99	14.29
La Crosse, WI MSA	22	0.66	0.00	0.00	3.31	9.09	83.15	86.36	13.54	4.55	0.00	5.71	77.14	17.14
Oshkosh, WI MSA	44	1.32	0.00	0.00	4.90	0.00	85.10	100.00	10.00	0.00	0.00	0.00	100.00	0.00
Racine, WI MSA	30	0.90	0.65	0.00	3.25	0.00	50.87	40.00	45.24	60.00	0.00	0.00	62.16	37.84
Sheboygan, WI MSA	19	0.57	0.00	0.00	11.36	0.00	85.35	94.74	3.28	5.26	0.00	12.05	87.95	0.00
Non-MSA WI	1,892	56.60	0.00	0.00	3.43	2.22	81.94	80.34	14.63	17.44	0.00	3.00	82.80	14.21

* Based on 2015 Peer Small Business Data – US

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

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF WISCONSIN						Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full-Scope Review:														
Milwaukee-Waukesha-West Allis, WI MSA	1,617	35.56	22.15	18.82	16.90	24.87	20.61	21.51	40.35	34.80	8.93	22.35	25.41	43.32
Madison, WI MSA	535	11.77	18.04	6.67	17.80	18.82	24.78	25.69	39.38	48.82	8.59	23.38	27.93	40.10
Wausau, WI MSA	180	3.96	17.35	13.64	19.31	21.02	25.47	30.11	37.86	35.23	8.92	22.07	28.12	40.89
Limited-Scope Review:														
Appleton, WI MSA	242	5.32	16.54	12.72	19.20	28.51	26.18	22.81	38.07	35.96	15.04	28.69	28.35	27.92
Duluth, WI MSA	8	0.18	19.43	25.00	21.81	25.00	22.12	12.50	36.63	37.50	7.14	24.13	28.38	40.35
Eau Claire, WI MSA	67	1.47	19.00	7.58	19.12	18.18	23.80	33.33	38.08	40.91	9.98	27.08	30.21	32.74
Fond du Lac, WI MSA	148	3.25	17.50	17.12	18.65	26.71	26.85	30.14	37.01	26.03	10.29	26.99	28.70	34.03
Green Bay, WI MSA	255	5.61	19.23	16.06	18.25	24.90	23.75	20.48	38.78	38.55	10.76	25.89	27.40	35.95
Janesville, WI MSA	152	3.34	19.66	10.14	18.49	26.35	22.32	25.00	39.53	38.51	8.28	25.62	27.18	38.92
La Crosse, WI MSA	51	1.12	17.97	10.00	18.47	40.00	24.53	22.00	39.03	28.00	10.47	25.71	26.74	37.08
Oshkosh, WI MSA	128	2.82	18.03	6.50	18.42	30.08	25.56	26.83	37.99	36.59	13.85	28.07	25.55	32.54
Racine, WI MSA	131	2.88	20.69	22.05	16.90	28.35	22.97	25.20	39.43	24.41	10.00	25.23	24.59	40.19
Sheboygan, WI MSA	114	2.51	18.50	12.84	18.89	34.86	25.11	24.77	37.50	27.52	10.82	30.26	28.58	30.34
Non-MSA WI	919	20.21	17.08	9.12	18.71	21.96	23.99	24.77	40.22	44.14	8.04	24.94	25.53	41.50

* Based on 2015 Peer Mortgage Data - US

** 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 4.4 percent of loans originated and purchased by BANK.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF WISCONSIN								Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
Full-Scope Review:															
Milwaukee-Waukesha-West Allis, WI MSA	127	26.68	22.15	11.81	16.90	14.96	20.61	29.13	40.35	44.09	8.44	20.31	24.91	46.34	
Madison, WI MSA	34	7.14	18.04	11.76	17.80	26.47	24.78	14.71	39.38	47.06	9.24	24.13	28.29	38.34	
Wausau, WI MSA	9	1.89	17.35	33.33	19.31	11.11	25.47	11.11	37.86	44.44	7.34	16.85	27.99	47.83	
Limited-Scope Review:															
Appleton, WI MSA	20	4.20	16.54	35.00	19.20	20.00	26.18	5.00	38.07	40.00	9.33	21.11	31.10	38.46	
Duluth, WI MSA	7	1.47	19.43	14.29	21.81	28.57	22.12	28.57	36.63	28.57	7.08	23.89	22.12	46.90	
Eau Claire, WI MSA	10	2.10	19.00	20.00	19.12	20.00	23.80	20.00	38.08	40.00	14.14	19.19	28.28	38.38	
Fond du Lac, WI MSA	8	1.68	17.50	0.00	18.65	25.00	26.85	37.50	37.01	37.50	7.69	17.65	28.51	46.15	
Green Bay, WI MSA	31	6.51	19.23	12.90	18.25	32.26	23.75	32.26	38.78	22.58	6.72	21.46	27.80	44.03	
Janesville, WI MSA	38	7.98	19.66	8.11	18.49	13.51	22.32	27.03	39.53	51.35	10.78	15.69	29.41	44.12	
La Crosse, WI MSA	2	0.42	17.97	50.00	18.47	50.00	24.53	0.00	39.03	0.00	8.72	20.98	30.52	39.78	
Oshkosh, WI MSA	12	2.52	18.03	16.67	18.42	25.00	25.56	16.67	37.99	41.67	8.15	20.25	28.40	43.21	
Racine, WI MSA	9	1.89	20.69	0.00	16.90	22.22	22.97	22.22	39.43	55.56	12.77	17.55	23.94	45.74	
Sheboygan, WI MSA	17	3.57	18.50	17.65	18.89	29.41	25.11	23.53	37.50	29.41	10.85	21.23	29.48	38.44	
Non-MSA WI	152	31.93	17.08	14.57	18.71	27.15	23.99	29.80	40.22	28.48	9.13	20.04	25.08	45.75	

* Based on 2015 Peer Mortgage Data - US

** 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 0.4 percent of loans originated and purchased by BANK.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2014 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***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
Full-Scope Review:															
Milwaukee-Waukesha-West Allis, WI MSA	2,840	34.43	22.15	8.31	16.90	19.89	20.61	24.83	40.35	46.97	6.50	17.08	25.51	50.91	
Madison, WI MSA	818	9.92	18.04	10.23	17.80	19.32	24.78	26.26	39.38	44.19	8.13	20.29	27.64	43.94	
Wausau, WI MSA	221	2.68	17.35	6.54	19.31	28.97	25.47	24.30	37.86	40.19	8.18	19.36	23.96	48.50	
Limited-Scope Review:															
Appleton, WI MSA	446	5.41	16.54	9.53	19.20	20.23	26.18	26.74	38.07	43.49	10.76	21.17	29.98	38.09	
Duluth, WI MSA	36	0.44	19.43	5.56	21.81	22.22	22.12	25.00	36.63	47.22	9.72	21.99	24.54	43.75	
Eau Claire, WI MSA	92	1.12	19.00	8.99	19.12	23.60	23.80	32.58	38.08	34.83	9.85	21.59	29.97	38.59	
Fond du Lac, WI MSA	159	1.93	17.50	13.46	18.65	23.08	26.85	27.56	37.01	35.90	8.64	19.22	29.62	42.53	
Green Bay, WI MSA	604	7.32	19.23	13.19	18.25	23.04	23.75	25.54	38.78	38.23	9.17	21.12	26.88	42.83	
Janesville, WI MSA	329	3.99	19.66	7.14	18.49	23.60	22.32	31.37	39.53	37.89	7.01	19.14	27.83	46.02	
La Crosse, WI MSA	48	0.58	17.97	28.89	18.47	22.22	24.53	15.56	39.03	33.33	11.32	21.88	25.61	41.19	
Oshkosh, WI MSA	186	2.25	18.03	8.89	18.42	19.44	25.56	23.89	37.99	47.78	12.08	21.75	27.35	38.82	
Racine, WI MSA	226	2.74	20.69	9.81	16.90	22.43	22.97	27.57	39.43	40.19	6.55	17.71	28.01	47.72	
Sheboygan, WI MSA	195	2.36	18.50	9.95	18.89	28.27	25.11	26.70	37.50	35.08	8.22	23.81	26.96	41.01	
Non-MSA WI	2,049	24.84	17.08	10.34	18.71	21.22	23.99	27.25	40.22	41.19	7.61	19.37	25.47	47.55	

* Based on 2015 Peer Mortgage Data - US

** 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 percent of loans originated and purchased by BANK.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF WISCONSIN			Evaluation Period: JANUARY 1, 2014 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-Scope Review:										
Milwaukee-Waukesha-West Allis, WI MSA	5,784	40.14	74.87	53.77	69.57	13.19	17.24	27,323	12,622	
Madison, WI MSA	1,635	11.35	77.45	64.89	80.49	8.99	10.52	9,916	5,040	
Wausau, WI MSA	370	2.57	76.88	67.57	81.89	8.38	9.73	2,090	867	
Limited-Scope Review:										
Appleton, WI MSA	697	4.84	74.13	55.52	73.60	12.05	14.35	3,132	1,356	
Duluth, WI MSA	51	0.35	76.70	54.90	72.55	11.76	15.69	388	140	
Eau Claire, WI MSA	237	1.64	77.77	53.59	70.04	6.75	23.21	2,125	920	
Fond du Lac, WI MSA	156	1.08	74.22	59.62	75.00	11.54	13.46	1,418	707	
Green Bay, WI MSA	880	6.11	77.92	58.30	75.34	13.52	11.14	4,752	2,159	
Janesville, WI MSA	616	4.28	77.98	63.15	75.97	12.34	11.69	1,775	826	
La Crosse, WI MSA	146	1.01	72.33	54.11	68.49	19.18	12.33	1,272	580	
Oshkosh, WI MSA	286	1.98	75.07	61.54	78.32	10.49	11.19	1,822	740	
Racine, WI MSA	420	2.91	79.68	53.33	68.57	16.90	14.52	2,799	1,346	
Sheboygan, WI MSA	224	1.55	75.40	71.43	80.36	11.16	8.48	1,443	731	
Non-MSA WI	2,907	20.17	77.58	63.54	75.09	12.07	12.83	13,999	6,333	

* Based on 2015 Peer Small Business Data – US

** 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 - 2015).

**** 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 10.64 percent of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF WISCONSIN			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full-Scope Review:									
Milwaukee-Waukesha-West Allis, WI MSA	90	2.69	95.15	46.67	50.00	32.22	17.78	153	62
Madison, WI MSA	267	7.99	97.52	63.67	54.68	28.46	16.85	359	163
Wausau, WI MSA	138	4.13	98.71	88.41	66.67	25.36	7.97	125	60
Limited-Scope Review:									
Appleton, WI MSA	257	7.69	97.04	85.21	65.37	22.96	11.67	148	91
Duluth, WI MSA	0	0.00	96.67	0.00	0.00	0.00	0.00	6	3
Eau Claire, WI MSA	132	3.95	98.87	50.00	40.15	22.73	37.12	155	65
Fond du Lac, WI MSA	96	2.87	96.32	61.46	61.46	25.00	13.54	160	112
Green Bay, WI MSA	203	6.07	97.42	65.52	51.23	28.57	20.20	191	69
Janesville, WI MSA	153	4.58	97.34	63.40	41.83	28.76	29.41	165	98
La Crosse, WI MSA	22	0.66	98.07	13.64	45.45	22.73	31.82	35	8
Oshkosh, WI MSA	44	1.32	98.57	86.36	68.18	27.27	4.55	57	25
Racine, WI MSA	30	0.90	96.75	86.67	50.00	50.00	0.00	37	24
Sheboygan, WI MSA	19	0.57	95.20	68.42	52.63	42.11	5.26	83	49
Non-MSA WI	1,892	56.60	97.58	62.79	55.50	26.59	17.92	1,822	712

* Based on 2015 Peer Small Business Data – US

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2.93 percent of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF WISCONSIN				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full-Scope Review:									
Milwaukee-Waukesha-West Allis, WI MSA	24	48,543	266	47,892	290	96,435	10.30	18	21,197
Madison, WI MSA	9	12,174	69	10,520	78	22,693	2.42	6	9,533
Wausau, WI MSA	0	0	21	3,441	21	3,441	0.37	2	2,242
Limited-Scope Review:									
Appleton, WI MSA	1	387	14	9,609	15	9,996	1.07	3	3,030
Duluth, WI MSA	0	0	9	323	9	323	0.03	1	166
Eau Claire, WI MSA	0	0	13	810	13	810	0.09	0	0
Fond du Lac, WI MSA	1	680	12	1,055	13	1,735	0.19	2	539
Green Bay, WI MSA	3	1,445	39	2,264	42	3,708	0.40	0	0
Janesville, WI MSA	4	2,442	47	1,494	51	3,936	0.42	0	0
La Crosse, WI MSA	0	0	8	610	8	610	0.07	0	0
Oshkosh, WI MSA	2	1,502	20	1,873	22	3,375	0.36	1	37
Racine, WI MSA	3	4,809	5	301	8	5,110	0.55	2	738
Sheboygan, WI MSA	1	766	9	26	10	792	0.08	1	330
Non-MSA WI	3	5108	89	23,387	92	28,496	3.05	2	4,076
Statewide/Regional	7	3,310	25	9,913	32	13,223	1.41	2	32

* '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, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	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-Scope Review:																	
Milwaukee-Waukesha-West Allis, WI MSA	49.78	71	35.86	9.86	15.49	36.62	38.03	0	1	0	0	-1	0	14.65	16.20	36.13	33.02
Madison, WI MSA	14.73	22	11.11	0.00	22.73	54.55	22.73	0	1	0	-1	0	0	5.48	13.42	58.05	22.49
Wausau, WI MSA	3.76	8	4.04	0.00	37.50	37.50	25.00	0	0	0	0	0	0	0.00	16.46	72.62	10.91
Limited-Scope Review:																	
Appleton, WI MSA	5.18	10	5.05	0.00	40.00	50.00	10.00	0	0	0	0	0	0	0.00	7.03	74.98	17.99
Duluth, WI MSA	.45	1	0.51	100.0	0.00	0.00	0.00	0	1	0	0	0	-1	5.11	16.35	78.54	0.00
Eau Claire, WI MSA	1.63	4	2.02	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, WI MSA	.85	2	1.01	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	12.31	79.11	8.58
Green Bay, WI MSA	4.98	12	6.06	0.00	25.00	66.67	8.33	0	2	0	-1	-1	0	1.44	21.93	52.93	23.34
Janesville, WI MSA	2.55	8	4.04	12.50	25.00	25.00	37.50	0	0	0	0	0	0	7.98	17.27	51.83	22.92
La Crosse, WI MSA	.60	3	1.52	0.00	33.33	66.67	0.00	0	0	0	0	0	0	4.80	13.86	64.64	16.71
Oshkosh, WI MSA	.76	3	1.52	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	16.29	67.13	16.58
Racine, WI MSA	1.78	6	3.03	0.00	0.00	66.67	33.33	0	0	0	0	0	0	4.70	14.33	53.49	27.48
Sheboygan, WI MSA	.98	5	2.53	0.00	20.00	80.00	0.00	0	0	0	0	0	0	0.00	23.36	69.54	7.10
Non-MSA WI	11.96	43	21.72	0.00	6.98	83.72	9.30	0	4	0	-1	-3	0	0.00	7.73	74.24	18.04