



PUBLIC DISCLOSURE

September 23, 2019

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

The First National Bank and Trust Company
Charter Number 2725

345 East Grand Street
Beloit, WI 53511

Office of the Comptroller of the Currency

Chicago Field Office
2001 Butterfield Rd., Suite 400
Downers Grove, IL 60515

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

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Overall CRA Rating

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

The Lending Test is rated: Outstanding.

The Community Development test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on an overall assessment of the bank's combined performance of lending in the states of Wisconsin and Illinois within the delineated assessment areas (AAs). Performance in Wisconsin received more consideration, as the majority of the bank's loans and deposits are in Wisconsin.
- In Wisconsin, the bank exhibits excellent geographic distribution of loans and excellent distribution of loans to individuals of different income levels and businesses of different sizes. In Illinois, the bank exhibits reasonable geographic distribution of loans and reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on an aggregate assessment of the bank's CD activities for loans, investments, and services in Wisconsin and Illinois. As noted above, we placed more weight on Wisconsin. CD activities in Wisconsin reflects excellent responsiveness to credit needs in the bank's AAs. CD activities in Illinois reflects adequate responsiveness to credit needs in the bank's AA.
- The bank's quarterly average loan-to-deposit ratio (LTD) is more than reasonable considering the bank's size, financial condition, and credit needs of the AAs.
- On a bank-wide level, a substantial majority of loans were made inside the bank's AAs.
- Retail banking services are reasonable. Four of the 13 branches are located in moderate-income census tracts (CTs) and six of the nine offsite automated teller machines (ATMs) are located in moderate-income CTs. The bank has a wide variety of retail banking services, some targeted to low- and moderate-income borrowers. Since the last Community Reinvestment Act (CRA) examination, the bank implemented a new checking account program aimed at those needing to reestablish their credit.
- The bank has a good level of alternative delivery systems that provide access to banking services throughout all portions of the AAs. This includes a large worldwide network of surcharge free ATMs, mobile deposits, and online banking for consumers and businesses.

Loan-to-Deposit Ratio

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

The bank's average quarterly LTD ratio on a bank-wide basis from March 31, 2016 to December 31, 2018 was outstanding at 78.2 percent. Additionally, the most recent LTD ratio as of December 31, 2018 was 80.2 percent. It is worth noting that the LTD ratio does not include the \$111 million of loans sold in the secondary market, which would increase the quarterly average LTD ratio to 91 percent. The bank's average quarterly LTD ratio exceeds the peer group, which consisted of two other similarly situated banks in terms of size and headquarters' location. The LTD ratio for these two banks were 71.8 percent and 68.4 percent, respectively during the same time period.

Lending in Assessment Area

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

The bank originated and purchased 2,317 loans during the evaluation period, of which 2,091, or 90.3 percent were inside the AAs. In terms of dollar amount of loans, the bank originated and purchased \$393.2 million during the evaluation period, of which \$311.7 million, or 79.3 percent were inside the AAs. This analysis is performed at the bank, rather than the individual AA level. Home mortgage loans are the primary loan product for Wisconsin and Illinois as the majority of loans originated and purchased during the evaluation period in terms of numbers and dollar amount were home mortgage loans.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage Loans										
2016	702	89.8	80	10.2	782	90,410	84.4	16,754	15.6	107,164
2017	625	91.1	61	8.9	686	77,414	87.2	11,404	12.8	88,818
2018	617	91.1	60	8.9	677	67,063	69.2	29,876	30.8	96,939
Subtotal	1,944	90.6	201	9.4	2,145	234,887	80.2	58,034	19.8	292,921
Commercial Loans										
2016	70	88.0	10	12.0	80	25,635	80.0	6,268	20.0	31,903
2017-18	77	84.0	15	16.0	92	51,206	75.0	17,225	25.0	68,431
Subtotal	147	85.0	25	15.0	172	76,841	77.0	23,493	23.0	100,334
Total	2,091	90.3	226	9.7	2,317	311,728	79.3	81,527	20.7	393,255

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data and Examiner Loan Sample
Due to rounding, totals may not equal 100.0

Description of Institution

The First National Bank and Trust Company (FNBT or the bank) is headquartered in Beloit, Wisconsin, approximately three blocks from the Illinois border and serves both the Wisconsin and Illinois markets. As of December 31, 2018, the bank had \$1.1 billion in total assets. This interstate nationally chartered bank is a wholly owned subsidiary of Centre I Bancorp, Incorporation, a one-bank holding company headquartered in Beloit, Wisconsin.

The bank has four AAs, of which three are in Wisconsin and one is in Illinois, 16 branch locations, and nine offsite ATMs. The first Wisconsin AA is in Rock County, which is part of the Janesville-Beloit metropolitan statistical area (MSA) and is referred to as the "Rock County AA." This AA contains the bank's main office, another five branches, and eight offsite ATMs. All offsite ATMs are in common public spaces, such as a transit center or library. The second Wisconsin AA contains two counties located in the South-Central Wisconsin Non-MSA and is referred to as the "Non-MSA AA." The two counties in this AA are Walworth and Lafayette. The bank has five branches in Walworth County and one branch in Lafayette County, which is in an underserved middle-income CT. The third Wisconsin AA is in Green County, which is part of the Madison MSA and is referred to as the "Green County AA." This AA has one branch, a nearby drive through, and one offsite ATM. The last AA is in Winnebago County, Illinois, which is part of the Rockford MSA and is referred to as the "Winnebago County AA." The bank has three branches in the Winnebago County AA.

FNBT's business strategy is to be a premier community bank that focuses on strong relationships with their customers. The bank offers numerous loan products, including commercial and industrial, commercial real estate, construction and development, small business, consumer, home improvement, home equity lines of credit, agricultural, and various home purchase loan products.

Alternative delivery systems are available to further support access to financial services. Aside from bank ATMs, FNBT participates in the Allpoint ATM network offering 37,000 surcharge free ATMs worldwide, and the Moneypass ATM network, which provides more than 40,000 surcharge free ATMs nationwide. The bank provides other free banking options, such as business online banking, consumer online banking, business mobile banking, and consumer mobile banking. The bank also offers mobile deposit and remote deposit capture.

As of December 31, 2018, gross loans and leases totaled \$803.1 million. FNBT's primary loan products by dollar amount are commercial real estate loans at \$349.6 million and home mortgage loans at \$226.6 million. Refer to Table 1 below for details of the loan portfolio mix by dollar amount. However, in terms of volume, the bank originated 1,944 home mortgage loans and 717 commercial loans during the evaluation period. As such, we placed more weight on home mortgage lending than commercial lending because the number of loans is a better indicator of the bank's activity to serve individuals and businesses.

The last CRA Performance Evaluation dated July 5, 2016 rated the bank overall as "Outstanding." The Lending test was "Outstanding" and the CD Test was "Satisfactory." There are no legal, financial, or other factors that would hinder the bank's ability to help meet the credit needs in its AA.

Table 1 - Loans (Outstanding Balance) By Category	\$(000's)	Percent
Commercial Real Estate Loans (including Construction & Development and Multifamily Loans)	349,621	43.5
Home Mortgage Loans	226,617	28.2
Commercial & Industrial Loans	100,540	12.5
Agricultural Loans (including Farmland)	96,735	12.2
Consumer Loans	10,999	1.3
Other Loans	18,625	2.3
Total Gross Loans and Leases	803,137	100.0
<i>Source: Figures reported in the bank's Report of Condition and Income ("Call Report") for the period-ending December 31, 2018.</i>		

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNBT was evaluated under the Intermediate Small Bank examination procedures, which includes a Lending Test and a CD Test to assess compliance with the CRA. The Lending Test evaluates the bank's recent performance of meeting the credit needs of its AA through its lending activity. The Lending Test evaluation only included the bank's primary loan products of home mortgage and commercial loans. The CD Test evaluates the bank's responsiveness to CD needs in their AAs through qualified lending, investments, and services. We considered the bank's lending activity from January 1, 2016 through December 31, 2018 and CD activities from June 1, 2016 through December 31, 2018.

All of the AAs meet regulatory requirements, contain whole geographies, and do not arbitrarily exclude low- or moderate-income CTs or reflect illegal discrimination. We evaluated data using two separate analysis periods due to changes in census data pursuant to the 2015 American Community Survey (ACS). We analyzed the bank's primary loan products originated in 2016 based on 2010 ACS census data. We compared the bank's 2016 lending performance to 2016 demographics and aggregate peer lending performance. We analyzed the bank's primary loan products originated in 2017 and 2018 (2017-2018) based on 2015 ACS census data. We compared the bank's 2017-2018 lending performance to 2017 and 2018 demographics and aggregate peer lending performance. We placed more weight on the bank's lending activity during 2017-2018, as that time period represented a majority of the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has a branch, we selected one or more of the AAs within that state for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multi-state metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated Non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope of Evaluation" in each state section for details on how we selected full-scope AAs. Refer to Appendix A for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of ratings for Wisconsin and Illinois.

Wisconsin received the greatest rating as 77 percent of the deposits and 77 percent of the loans are from Wisconsin. Additionally, Wisconsin has 13 of the 16 branch locations. Home mortgage lending received the most weight in both Wisconsin and Illinois based on higher loan volume.

The state ratings are based on performance in each of the AAs. Refer to the "Scope of Evaluation" in each state section for details on how we weighted each of the AAs to determine the state's rating. There is only one AA in Illinois.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin¹: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans in Wisconsin. The evaluation placed more weight on the geographic distribution of home mortgage lending, which is excellent. The geographic distribution of small loans to businesses is reasonable.
- The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- Based on full-scope and limited-scope reviews, the bank exhibits excellent responsiveness to the CD needs in Wisconsin through qualified CD loans, investments, and services.
- The limited-scope reviews were consistent with the full-scope review (Rock County AA) findings.

Description of Institution's Operations in Wisconsin

The bank has three AAs in Wisconsin; the Rock County AA, Non-MSA AA, and Green County AA. There are 13 branch locations, including the main branch in Beloit, and nine offsite ATMs. For the years 2016 through 2018, 77 percent of bank loans and 77 percent of bank deposits were from Wisconsin. The bank's business focus in Wisconsin is the same for the entire bank.

Rock County AA

The bank's main office is in Rock County, with an additional five branches and eight offsite ATMs. Major towns in Rock County are Janesville, the county seat, and Beloit, where the main branch is.

The Rock County AA includes all CTs in the county. According to the 2015 ACS Census, the AA consists of 38 CTs, of which one is low-income, 13 are moderate-income, 15 are middle-income, and nine are upper-income. As of December 31, 2018, the population was 160,727 people with 63,845 households. Families living in poverty were 11.6 percent, which is an increase from 9.4 percent in 2016. As of December 31, 2018, the average unemployment rate was 3.2 percent, which was higher than the state of 3 percent.

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

As of 2018 for companies reporting revenue size, 92 percent of the businesses earned revenue of \$1 million or less, with 96 percent employing 50 or fewer employees. Major industries are services at 38 percent and retail trade at 16 percent of businesses.

According to the 2015 ACS Census, the median housing value of owner-occupied units was \$130,169, which is a decline from the 2016 median housing value of \$138,205. Median family income for 2018 was \$60,820, with low-income families earning less than \$33,450 and moderate-income families earning less than \$53,520. Median housing values were 3.9 times the annual income of low-income families and 2.4 times the annual income of moderate-income families. Refer to Table A below for further information on the demographics in the Rock County AA for 2018. We did not include the Non-MSA AA or Green County AA demographic tables, as we performed a full-scope review only for the Rock County AA.

Competition for deposits in this AA is strong. Rock County accounts for 37 percent of all bank deposits. Per the June 30, 2019 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the FNBT held \$353.9 million in deposits, or 12.7 percent of the market share and ranked fourth out of 17 deposit market competitors. It is worth noting that the top three institutions are much larger and have significantly more branches than the bank. Rock County accounts for 36 percent of the bank's home mortgage lending. Competition for home mortgage loans is strong. Based on the 2018 Peer Mortgage Data Report, FNBT held \$20.6 million in home mortgage loans, or 3.8 percent of the market share and ranked fifth out of 239 reporting institutions.

During this examination, we reviewed recent community contacts in the Rock County AA. Community contacts stated there is a need for community revitalization and stabilization in downtown districts, in addition to home mortgage and home improvement financing.

Non-MSA AA

The Non-MSA AA consists of Walworth County and Lafayette County. FNBT has five branches in Walworth County and one branch in Lafayette County, which is an underserved middle-income CT. The Non-MSA has 27 CT, of which 18 are middle-income, eight are upper-income, and one has not been assigned an income classification. There are no low- or moderate-income CTs. As of December 31, 2018, the Non-MSA's population was 119,874 people with 58,891 housing units. The average unemployment rate was 2.9 percent in Walworth County and 2.3 percent in Lafayette County, both below the state rate of 3 percent. Major industries are services at 35 percent and retail trade at 14 percent of businesses. The Non-MSA accounts for 27 percent of the bank's deposits and 31 percent of the bank's home mortgage lending.

Green County AA

In the Green County AA, the bank has one branch and one offsite ATM. Green County has eight CTs, of which five are moderate-income and three are middle-income. There are no low- or upper-income CTs. Green County has the smallest population of all the AAs with 36,842 people with 15,754 housing units. As of December 31, 2018, the average unemployment rate was 2.6 percent, which is below the state of 3 percent. Major industries are services at 32 percent and farming at 15 percent of businesses. Green County accounts for 12 percent of the bank's deposits and 9 percent of the bank's home mortgage lending.

Rock County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rock County AA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	38	2.6	34.2	39.5	23.7	0.0
Population by Geography	160,727	1.7	27.6	42.8	27.9	0.0
Housing Units by Geography	68,332	1.6	27.8	43.3	27.3	0.0
Owner-Occupied Units by Geography	44,177	0.8	21.4	46.2	31.7	0.0
Occupied Rental Units by Geography	19,668	2.9	40.3	38.9	17.8	0.0
Vacant Units by Geography	4,487	4.4	36.0	34.3	25.3	0.0
Businesses by Geography	7,228	1.3	27.4	37.5	33.8	0.0
Farms by Geography	513	0.8	7.4	41.1	50.7	0.0
Family Distribution by Income Level	42,099	20.7	18.2	21.6	39.6	0.0
Household Distribution by Income Level	63,845	22.7	17.6	18.4	41.3	0.0
Median Family Income MSA - 27500 Janesville-Beloit, WI MSA		\$60,820	Median Housing Value			\$130,169
			Median Gross Rent			\$736
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Wisconsin

The Rock County AA received a full-scope examination. The Non-MSA AA and Green County AA received limited-scope examinations. The bank delineated non-MSAs within Wisconsin are combined, analyzed, and presented as one AA for purposes of this evaluation. The Rock County AA received a full-scope examination, as it has the highest population of all the Wisconsin AAs, highest number of CTs, and highest number of low- and moderate-income CTs. Refer to Appendix A for a list of AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in Wisconsin. This evaluation places more weight on home mortgage lending. The geographic distribution of home mortgage loans is excellent, while the geographic distribution of small loans to businesses is reasonable.

Home Mortgage Loans

Refer to Tables O related to Wisconsin in Appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loans originated and purchased by the bank.

Rock County AA

The geographic distribution of home mortgage loans in the Rock County AA is excellent.

The bank's geographic distribution of home mortgage loans in 2017-18 is excellent. The moderate-income CT data changed, causing the AA to have 13 moderate-income CTs compared to eight in 2016. The bank's percentage of home mortgage loans in moderate-income geographies is 30.9 percent, which significantly exceeds owner-occupied housing units of 21.4 percent and aggregate peer lending of 18.5 percent. The low-income CT data also changed, causing the AA to have one low-income CT compared to four in 2016. The bank did not originate or purchase any home mortgage loans in low-income geographies; however, the percentage of owner-occupied housing units was less than one percent, making it difficult to lend to low-income geographies.

The bank's geographic distribution of home mortgage loans in 2016 is excellent. The bank's percentage of home mortgage loans in low-income geographies is 4.8 percent, which exceeds owner-occupied housing units of 4.6 percent and significantly exceeds aggregate peer lending of 2.9 percent. The bank's percentage of home mortgage loans in moderate-income geographies is 14.7 percent, which is near owner-occupied housing units of 15.7 percent and exceeds aggregate peer lending of 11.7 percent.

Small Loans to Businesses

Refer to Tables Q related to Wisconsin in Appendix D for the facts and data used to evaluate the geographic distribution of small loans to businesses originated and purchased by the bank.

Rock County AA

The geographic distribution of loans to small businesses in the Rock County AA is reasonable.

The bank's geographic distribution of small loans to businesses in 2017-2018 is reasonable. The bank's percentage of small loans to businesses in moderate-income geographies is 18 percent, which is below the percentage of businesses at 27.4 percent and aggregate peer lending of 24 percent; however, the bank made several large loans to businesses in moderate-income geographies, which increases the bank's performance to aggregate peer lending. The bank did not make any small loans to businesses in low-income geographies; however, with the CT data change, there was only one low-income CT accounting for 92 businesses, or 1 percent of the AA businesses, making it difficult to lend to low-income geographies.

The bank's geographic distribution of small loans to businesses in 2016 is reasonable. The bank's percentage of small loans to businesses in moderate-income geographies is 25 percent, which exceeds the percentage of businesses at 18.9 percent and significantly exceeds aggregate peer lending of 15.4 percent. However, the bank did not make any small loans to businesses in low-income geographies, which held 7.9 percent of businesses and 5.8 percent of aggregate peer lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes in Wisconsin, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Tables P related to Wisconsin in Appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loans originated and purchased by the bank.

Rock County AA

The borrower distribution of home mortgage loans in the Rock County AA is excellent.

The bank's borrower distribution of home mortgage loans in 2017-2018 is excellent. The bank's percentage of home mortgage loans to low-income borrowers is 13.7 percent, which is below low-income families of 20.7 percent but exceeds aggregate peer lending of 9.3 percent. The bank's percentage of home mortgage loans to moderate-income borrowers is 21.7 percent, which exceeds moderate-income families of 18.2 percent and aggregate peer lending of 19.9 percent.

The bank's borrower distribution of home mortgage loans in 2016 is reasonable. The bank's percentage of home mortgage loans to low-income borrowers is 13 percent, which is below low-income families of 19.7 percent but significantly exceeds aggregate peer lending of 5.5 percent. The bank's percentage of home mortgage loans to moderate-income borrowers is 14.3 percent, which is near moderate-income families of 18.5 percent and aggregate peer lending of 18.2 percent.

Small Loans to Businesses

Refer to Tables R related to Wisconsin in Appendix D for the facts and data used to evaluate the borrower distribution of small loans to businesses originated and purchased by the bank.

Rock County AA

The borrower distribution of small loans to businesses in the Rock County AA is excellent.

The bank's borrower distribution of small loans to businesses in 2017-2018 is excellent. The bank's percentage of small loans to businesses is 71 percent, which is below the percentage of businesses at 79.5 percent but significantly exceeds aggregate peer lending of 48.9 percent. The bank's borrower distribution of small loans to businesses in 2016 is reasonable. The bank's percentage of small loans to businesses is 48 percent, which is significantly below the percentage of businesses at 79.7 percent but exceeds aggregate peer lending of 45.2 percent.

Responses to Complaints

The bank has not received any written comments or complaints regarding efforts to meet the credit needs in Wisconsin during the evaluation period. The OCC has also not received any written complaints, comments, or inquiries concerning the bank and its efforts to comply with the spirit and intent of the CRA.

Conclusions for Areas Receiving Limited Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Lending Test in the Non-MSA and Green County AAs is consistent with the overall performance under the Lending Test in the full-scope review of the Rock County AA.

COMMUNITY DEVELOPMENT TEST

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

Based on full-scope and limited-scope reviews, the bank exhibits excellent responsiveness to CD needs in Wisconsin through qualified loans, investments, and services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

The level of qualified CD loans in the Wisconsin AAs reflects excellent responsiveness to the needs of the community. During the evaluation period, FNBT originated 10 qualified loans in Wisconsin totaling \$15.5 million. Six of the loans totaling \$14.7 million, or 14 percent of tier 1 capital were in the Rock County AA. Significant loans in the Rock County AA included a large loan to a manufacturing operation expanding in Janesville, Wisconsin, which added 100 full-time positions, and a large loan for the construction of a hotel to help revitalize and stabilize downtown Janesville, Wisconsin.

The bank participates in different types of local and government-insured mortgage loans that offer no- or low-down payment options, lower interest rates for first time homeowners, and interest free-deferred loans and/or assistance with closing costs. One such type of loan is the Farm Services Administration (FSA) loan. The FSA allows banks to extend credit in circumstances where it otherwise would not be available. During the evaluation period, FNBT originated 11 FSA loans in Wisconsin totaling \$7.7 million, or 7 percent of tier 1 capital. The bank also participates in the Wisconsin Housing and Economic Development Authority (WHEDA) Program. During the evaluation period, FNBT originated 121 WHEDA loans in Wisconsin totaling \$12.2 million, or 11 percent of tier 1 capital.

Number and Amount of Qualified Investments

The level of qualified investments is excellent.

During the evaluation period, FNBT provided 101 qualified investments in Wisconsin totaling \$192,151, of which \$164,236, or 85.4 percent were in the Rock County AA. The bank only provided information on donations and no other type of investments for consideration. Qualified donations were for community services, economic development, revitalization and stabilization, and affordable housing.

Qualified Investments - Wisconsin										
Assessment Area:	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Rock County	0	0	71	164	71	70.2	164	85.4	0	0
Non-MSA	0	0	26	19	26	25.7	19	9.9	0	0
Green County	0	0	4	9	4	4.1	9	4.7	0	0
Total	0	0	101	192	101	100.0	192	100.0	0	0

* Prior Period refers to investments made in a previous evaluation period that are outstanding as of the examination date.

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

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services provided by bank employees and officers reflects excellent responsiveness to the needs of the community.

During the evaluation period, FNBT performed 266 services for 717 hours in Wisconsin, of which 258 services for 624 hours were in the Rock County AA. These qualifying services were primarily related to community services and economic development, with affordable housing and revitalization and stabilization services to a lesser extent.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Non-MSA and Green County AAs is consistent with the overall performance under the CD Test in the full-scope review of the Rock County AA.

State Rating

State of Illinois

CRA rating for the State of Illinois²: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in Illinois. Although the evaluation placed more weight on the geographic distribution of home mortgage lending which is poor, the geographic distribution of small business loans is excellent.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank recognizes the lending gap in home mortgage lending in the Winnebago County AA and has taken significant steps to improve lending to low- and moderate-income borrowers. This included extending 20 Illinois Housing Development Authority (IHDA) loans and sponsoring bi-annual home ownership workshops in Rockford, Illinois.
- Based on the full-scope review, the bank exhibits adequate responsiveness to the CD needs in Illinois through qualified CD loans, investments, and services.

Description of Institution's Operations in Illinois

The bank has one AA in Illinois, the Winnebago County AA, which has the largest population and the most low- and moderate-income CTs of all bank AAs. Major towns in the Winnebago AA include Loves Park, Machesney Park, Roscoe, Rockton and Rockford, which is the county seat. The Winnebago County AA contains three bank branches in Roscoe, Rockton, and Winnebago. The bank's business focus in the Winnebago County AA is the same for the entire bank.

The Winnebago County AA includes all CTs in the county. According to the 2015 ACS Census, the AA consists of 77 CTs, of which 13 are low-income, 18 are moderate-income, 21 are middle-income, 23 are upper-income, and two have not been assigned an income classification. The majority of low- and moderate-income CTs are located in Rockford. As of December 31, 2018, the population was 290,439 people with 125,720 housing units. Families living in poverty was 12.9 percent, which is an increase from 11.5 percent in 2016. As of December 2018, the average unemployment rate was 5.7 percent, which is higher than the state of 4.3 percent.

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

As of 2018 for companies reporting revenue size, 95 percent of the businesses earned revenue of \$1 million or less, with 96 percent employing 50 or fewer employees. Major industries are services at 41 percent and retail trade at 15 percent of businesses.

According to the 2015 ACS Census, the median housing value of owner-occupied units was \$111,424, which is a significant decline from the 2016 median housing value of \$126,369. Median family income for 2018 was \$60,048, with low-income families earning less than \$33,100 and moderate-income families earning less than \$52,960. Median housing values were 3.3 times the annual income of low-income families and 2.1 times the annual income of moderate-income families. Refer to Table A below for further information on the demographics in the Winnebago County AA for 2018.

Competition for deposits in this AA is strong. Winnebago County accounts for 24 percent of all bank deposits. Per the June 30, 2019 FDIC Deposit Market Share Report, FNBT held \$222.1 million, or 3.8 percent of the market share and ranked 11th out of 22 deposit market competitors. It is worth noting the market is dominated by much larger financial institutions that have significantly more branches, including Midland States Bank, Associated Bank, JP Morgan Chase, and BMO Harris. Within the market, these larger financial institutions have a significant presence in Rockford. Winnebago County accounts for 24 percent of the bank's home mortgage lending. Competition for home mortgage loans is strong. Based on the 2018 Peer Mortgage Data Report, FNBT held \$10.8 million, or 1.8 percent of the market share and ranked 14th out of 270 reporting institutions.

During this examination, we made contact with a community group whose mission is to provide greater housing opportunities for all, free from discrimination. The contact explained the need for lenders to provide affordable housing loans to those in the Rockford area and financial solutions to keep people in their homes rather than evict and foreclose. The contact stated that over the decades, the Rockford area has not progressed well and banks need to do a better job to serve this community.

In response to community credit needs, the bank offers a checking account called Renew Checking. This account is for those that need a second chance to rebuild their financial record and is offered for no monthly fee to those in low- and moderate-income CTs in the Winnebago County AA. The account provides ATM access with a wide-range of surcharge-free machines, free online banking, bill pay and e-statements, free mobile banking, and mobile applications. The account requires \$25 to open with no monthly minimum balance requirements. Additionally, the bank began participating in the IHDA loan program, which provides affordable home loans with down payment and closing cost assistance.

Winnebago County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Winnebago County AA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	16.9	23.4	27.3	29.9	2.6
Population by Geography	290,439	12.8	20.3	27.2	39.3	0.4
Housing Units by Geography	125,720	13.2	20.5	27.5	38.1	0.7
Owner-Occupied Units by Geography	75,502	6.1	16.7	29.9	47.3	0.0
Occupied Rental Units by Geography	38,410	23.2	27.0	23.8	24.2	1.8
Vacant Units by Geography	11,808	25.6	23.1	24.6	24.8	1.9
Businesses by Geography	13,956	10.6	16.1	25.9	44.6	2.7
Farms by Geography	499	3.4	11.8	25.3	58.5	1.0
Family Distribution by Income Level	74,809	23.0	17.0	20.0	39.9	0.0
Household Distribution by Income Level	113,912	26.0	16.1	17.8	40.1	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$60,048	Median Housing Value			\$111,424
			Median Gross Rent			\$763
			Families Below Poverty Level			12.9%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

Winnebago County AA is the bank's only AA in Illinois and received a full-scope examination. Refer to Appendix A for a list of the AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS**LENDING TEST**

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

Based on a full-scope review, the bank's lending performance in Illinois is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in Illinois. This evaluation places more weight on home mortgage lending. The geographic distribution of home mortgage loans is poor, while the geographic distribution of small business loans is excellent.

Home Mortgage Loans

Refer to Tables O related to Illinois in Appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loans originated and purchased by the bank.

Winnebago County AA

The geographic distribution of home mortgage loans in the Winnebago County AA is poor.

The bank's geographic distribution of home mortgage loans in 2017-2018 significantly improved but remains poor. The bank's percentage of home mortgage loans in low-income geographies was 1 percent, which is significantly below owner-occupied housing units of 6.1 percent and aggregate peer lending of 3.3 percent. The bank's percentage of home mortgage loans in moderate-income geographies improved to 10 percent and is near owner-occupied housing units of 16.7 percent and aggregate peer lending of 14 percent.

The bank's geographic distribution of home mortgage loans in 2016 is poor. Although the bank did not originate or purchase any home mortgage loans in low-income geographies, aggregate peer lending of 1.6 percent was low and below owner-occupied housing units of 4.8 percent. The bank's percentage of home mortgage loans in moderate-income geographies is 3.9 percent, which is significantly below owner-occupied housing units of 20.5 percent and aggregate peer lending of 13.6 percent.

Small Loans to Businesses

Refer to Tables Q related to Illinois of Appendix D for the facts and data used to evaluate the geographic distribution of small loans to businesses originated and purchased by the bank.

Winnebago County AA

The geographic distribution of small loans to businesses in the Winnebago County AA is excellent.

The bank's geographic distribution of small loans to businesses in 2017-2018 is excellent. The bank's percentage of small loans to businesses in low-income geographies is 9 percent, which is near the percentage of businesses at 10.6 percent and aggregate peer lending of 11.8 percent. However, the bank made several large loans to businesses in low-income geographies, which increases the bank's performance to significantly exceed the percentage of businesses and aggregate peer lending. The bank's percentage of small loans to businesses in moderate-income geographies is 27 percent, which significantly exceeds the percentage of businesses at 16.1 percent and aggregate peer lending of 15.3 percent.

The bank's geographic distribution of small loans to businesses in 2016 is excellent. The bank's percentage of small loans to business in low-income geographies is 25 percent, which significantly exceeds the percentage of businesses at 7.4 and aggregate peer lending of 7.1 percent. The bank's percentage of small loans to businesses in moderate-income geographies is 13 percent, which is below the percentage of businesses at 21.5 percent but near aggregate peer lending of 19.9 percent; however, the bank made several large loans to businesses in moderate-income geographies, which increases the bank's performance to the percentage of businesses and aggregate peer lending.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Tables P related to Illinois in Appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loans originated and purchased by the bank.

Winnebago County AA

The borrower distribution of home mortgage loans in the Winnebago County AA is reasonable.

The bank's borrower distribution of home mortgage loans in 2017-2018 improved and is reasonable. The bank's percentage of home mortgage loans to low-income borrowers is 7.2 percent, which is significantly below low-income families of 23 percent but near aggregate peer lending of 10.4 percent. The bank's percentage of home mortgage loans to moderate-income borrowers is 14.8 percent, which is near moderate-income families of 17 percent and aggregate peer lending of 20.1 percent.

Although the bank originated and purchased fewer home mortgage loans than aggregate peer lending, the bank originated and purchased a notable amount of loans to low- and moderate-income borrowers considering the obstacles to home ownership. Competition for home mortgage loans is significant. The bank ranked 14th in home mortgage lending behind large lenders, such as U.S. Bank, Quicken Loans, and Wells Fargo.

To help applicants overcome lending obstacles, the bank began participating in the IHDA loan program. These loans are not included in the above totals. During 2017 and 2018, the bank made 20 such loans, which improved the distribution of loans to a reasonable level.

The bank's borrower distribution of home mortgage loans in 2016 is poor. The bank's percentage of home mortgage loans to low-income borrowers is 4.5 percent, which is significantly below low-income families of 22.5 percent but near aggregate peer lending of 5.8 percent. The bank's percentage of home mortgage loans to moderate-income borrowers is 13 percent, which is near moderate-income families of 18 percent and aggregate peer lending of 17.3 percent.

Small Loans to Businesses

Refer to Tables R related to Illinois in Appendix D for the facts and data used to evaluate the borrower distribution of small loans to businesses originated and purchased by the bank.

Winnebago County AA

The distribution of small loans to businesses in the Winnebago County AA is excellent.

The bank's borrower distribution of small loans to businesses in 2017-18 is excellent. The bank's percentage of small loans to businesses is 61 percent, which is below the percentage of businesses at 77.6 percent but significantly exceeds aggregate peer lending of 45.1 percent. The bank's borrower distribution of small loans to businesses in 2016 is reasonable. The bank's percentage of small loans to

businesses is 40 percent, which is significantly below the percentage of businesses at 78.5 percent but near aggregate peer lending of 41.7 percent.

Responses to Complaints

The bank has not received any written comments or complaints regarding efforts to meet the credit needs in Illinois during the evaluation period. The OCC has also not received any written complaints, comments, or inquiries concerning the bank and its efforts to comply with the spirit and intent of the CRA.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in Illinois is Satisfactory.

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in Illinois through qualified CD loans, investments, and services, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

The level of qualified CD loans in the Winnebago County AA represents poor responsiveness to the needs of the community. During the evaluation period, FNBT originated one qualified loan of \$420,000 for a small commercial office building in a moderate-income CT with adjoining low- and moderate-income CTs on two sides.

Number and Amount of Qualified Investments

The level of qualified investments is reasonable.

During the evaluation period, FNBT provided 22 qualified investments totaling \$193,530. The bank only provided information on donations and no other type of investments for consideration. Qualified donations were for affordable housing and community services.

Qualified Investments - Illinois										
Assessment Area:	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Winnebago County	0	0	22	193	22	100	193	100	0	0

* Prior Period refers to investments made in a previous evaluation period that are outstanding as of the examination date.

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

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services provided by bank employees and officers reflects excellent responsiveness to the needs of the community.

During the evaluation period, FNBT performed 53 services for 109 hours. The qualifying services were primarily related to community services and economic development.

Since our last performance evaluation and as a response to community credit needs, the bank began hosting bi-annual home buyer workshops in the Rockford area where low-and moderate-income CTs are located. The workshop is a free event open to anyone. These workshops are educational and bring together members of the home purchasing community, including lenders, realtors, home inspectors, etc. Since inception, 121 people have attended the workshops.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2016 - 12/31/2018	
Bank Products Reviewed:	Home mortgage loans, small loans to businesses, and community development loans, investments, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wisconsin		
Janesville-Beloit MSA	Full-Scope	All of Rock County, WI
Madison MSA	Limited-Scope	All of Green County, WI
Non-MSA WI	Limited-Scope	All of Lafayette County and Walworth County, WI
Illinois		
Rockford MSA	Full-Scope	All of Winnebago County, IL

Appendix B: Summary of Bank and State Ratings

RATINGS – FNBT			
Overall Bank:	Lending Test Rating*	Community Development Test Rating	Overall Rating
FNBT	Outstanding	Outstanding	Outstanding
<i>MMSA or State:</i>			
Wisconsin	Outstanding	Outstanding	Outstanding
Illinois	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A CT 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 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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

Rating Area: A rated area is a state or MMSA. 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 MMSA, the institution will receive a rating for the MMSA.

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.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All MMSAs, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this performance evaluation.

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography- Wisconsin																	2017-2018		
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Rock County	446	40,238	46.9	0.8	0.0	1.0	21.4	30.9	18.5	46.2	52.0	46.3	31.7	17.0	34.2	0.0	0.0	0.0	
Green County	130	12,530	13.7	0.0	0.0	0.0	50.8	76.2	44.4	49.2	23.8	55.6	0.0	0.0	0.0	0.0	0.0	0.0	
Non-MSA	375	68,017	39.4	0.0	0.0	0.0	0.0	0.0	0.0	64.7	77.3	64.2	35.1	22.7	35.7	0.2	0.0	0.1	
Total	951	120,784	100	0.4	0.0	0.5	17.2	24.9	14.1	53.4	58.1	54.0	29.0	16.9	31.3	0.1	0.0	0.1	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 HMDA Data, Aggregate data is 2017, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography- Wisconsin																	2016		
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Rock County	231	22,652	42.2	4.6	4.8	2.9	15.7	14.7	11.7	55.9	53.2	56.1	23.9	27.3	29.3	0.0	0.0	0.0	
Green County	74	9,032	13.5	0.0	0.0	0.0	46.0	60.8	35.9	54.0	39.2	64.1	0.0	0.0	0.0	0.0	0.0	0.0	
Non-MSA	243	43,457	44.3	0.0	0.0	0.0	0.0	0.0	0.0	56.2	52.3	49.5	43.8	47.7	50.5	0.0	0.0	0.0	
Total	548	75,141	100	2.3	2.0	1.4	13.7	14.4	10.0	55.8	50.9	54.4	28.2	32.7	34.2	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 HMDA Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography-Illinois																2017-2018		
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Winnebago County	291	23,693	100	6.1	1.0	3.3	16.7	10.0	14.0	29.9	12.0	32.5	47.3	77.0	50.2	0.0	0.0	0.1
Total	291	23,693	100	6.1	1.0	3.3	16.7	10.0	14.0	29.9	12.0	32.5	47.3	77.0	50.2	0.0	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 HMDA Data, Aggregate data is 2017, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography-Illinois																2016		
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Winnebago County	154	15,269	100	4.8	0.0	1.6	20.5	3.9	13.6	46.1	57.8	50.2	28.6	38.3	34.5	0.0	0.0	0.0
Total	154	15,269	100	4.8	0.0	1.6	20.5	3.9	13.6	46.1	57.8	50.2	28.6	38.3	34.5	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 HMDA Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower-Wisconsin																			2017-2018		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Rock County	446	40,238	46.9	5,806	20.7	13.7	9.3	18.2	21.7	19.9	21.6	26.0	25.5	39.6	37.2	32.6	0.0	1.3	12.7		
Green County	130	12,530	27.5	1,123	23.7	28.5	15.1	22.3	23.1	22.4	26.1	28.5	27.0	27.8	19.2	24.8	0.0	0.8	10.6		
Non-MSA	375	68,017	39.4	4,240	15.8	6.7	6.3	17.4	13.6	16.7	20.1	20.8	21.0	46.8	56.0	44.5	0.0	2.9	11.3		
Total	951	120,784	100.0	11,169	19.2	12.9	8.8	18.4	18.7	18.9	21.6	24.3	24.0	40.8	42.2	36.3	0.0	1.9	12.0		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "-" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower-Wisconsin																			2016		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Rock County	231	22,652	42.2	5,325	19.7	13.0	5.5	18.5	14.3	18.2	22.3	21.2	22.7	39.5	48.9	39.3	0.0	2.6	14.3		
Green County	74	9,032	13.5	1,319	24.0	32.4	13.6	22.7	32.4	22.4	25.7	13.5	26.2	27.5	20.3	25.9	0.0	1.4	11.8		
Non-MSA	243	43,457	44.3	4,364	13.9	4.1	3.7	16.3	12.8	12.5	22.6	18.1	18.7	47.3	60.5	50.5	0.0	4.5	14.6		
Total	548	75,141	100.0	11,008	18.1	11.7	5.8	18.2	16.1	16.4	22.8	18.8	21.5	40.9	50.2	42.2	0.0	3.3	14.1		

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 HMDA Data, 2016 HMDA Aggregate Data, "-" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower-Illinois																			2017-2018	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Winnebago County	291	23,693	100.0	7,772	23.0	7.2	10.4	17.0	14.8	20.1	20.0	26.8	21.2	39.9	47.1	25.4	0.0	4.1	22.9	
Total	291	23,693	100.0	7,772	23.0	7.2	10.4	17.0	14.8	20.1	20.0	26.8	21.2	39.9	47.1	25.4	0.0	4.1	22.9	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower-Illinois																			2016	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Winnebago County	154	15,269	100.0	7,297	22.5	4.5	5.8	18.0	13.0	17.3	21.6	24.0	20.4	37.8	50.0	33.9	0.0	8.4	22.6	
Total	154	15,269	100.0	7,297	22.5	4.5	5.8	18.0	13.0	17.3	21.6	24.0	20.4	37.8	50.0	33.9	0.0	8.4	22.6	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography-Wisconsin																			2017-2018		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Rock County	17	5,951	34.0	1,582	1.3	0.0	1.2	27.4	18.0	24.0	37.5	59.0	36.9	33.8	23.0	37.9	0.0	0.0	0.0		
Green County	11	2,674	22.0	428	0.0	0.0	0.0	61.6	100.0	55.8	38.4	0.0	44.2	0.0	0.0	0.0	0.0	0.0	0.0		
Non-MSA	22	2,266	44.0	1,952	0.0	0.0	0.0	0.0	0.0	0.0	71.4	91.0	67.6	27.6	9.0	31.9	1.0	0.0	0.5		
Total	50	10,891	100.0	3,962	0.6	0.0	0.5	20.7	28.0	15.6	52.0	60.0	52.8	26.3	12.0	30.9	0.4	0.0	0.3		

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data and Examiner Loan Sample.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography-Wisconsin																			2016		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Rock County	12	4,439	37.5	1,651	7.9	0.0	5.8	18.9	25.0	15.4	45.0	33.0	45.9	28.1	42.0	33.0	0.0	0.0	0.0		
Green County	4	288	12.5	436	0.0	0.0	0.0	58.3	50.0	41.5	41.7	50.0	58.5	0.0	0.0	0.0	0.0	0.0	0.0		
Non-MSA	16	2,616	50.0	2,072	0.0	0.0	0.0	0.0	0.0	0.0	57.5	81.0	51.9	42.5	19.0	48.1	0.0	0.0	0.0		
Total	32	7,343	100.0	4,159	3.7	0.0	2.3	16.2	15.6	10.5	49.7	59.4	50.2	30.5	25.0	37.1	0.0	0.0	0.0		

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data and Examiner Loan Sample.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography-Illinois																			2017-2018		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Winnebago County	11	958	100	3,414	10.6	9.0	11.8	16.1	27.0	15.3	25.9	9.0	26.2	44.6	45.0	43.8	2.7	9.0	2.8		
Total	11	958	100	3,414	10.6	9.0	11.8	16.1	27.0	15.3	25.9	9.0	26.2	44.6	45.0	43.8	2.7	9.0	2.8		

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data and Examiner Loan Sample.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography-Illinois																			2016		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Winnebago County	8	2,257	100	3,461	7.4	25.0	7.1	21.5	13.0	19.9	43.9	13.0	44.1	26.7	50.0	28.6	0.6	0.0	0.4		
Total	8	2,257	100	3,461	7.4	25.0	7.1	21.5	13.0	19.9	43.9	13.0	44.1	26.7	50.0	28.6	0.6	0.0	0.4		

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data and Examiner Loan Sample.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018	
Wisconsin												
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Rock County	17	5,951	34.0	1,582	79.5	71.0	48.9	7.0	29.0	13.6	0.0	
Green County	11	2,674	22.0	428	80.8	73.0	51.9	6.7	27.0	12.6	0.0	
Non-MSA	22	2,266	44.0	1,952	80.9	55.0	53.1	7.4	45.0	11.7	0.0	
Total	50	10,891	100.0	3,962	80.3	63.3	51.3	7.1	36.7	12.7	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data and Examiner Loan Sample
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Wisconsin												
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Rock County	12	4,349	37.5	1,651	79.7	48.0	45.2	6.8	52.0	13.5	0.0	
Green County	4	288	12.5	436	80.7	50.0	45.9	6.8	50.0	12.5	0.0	
Non-MSA	16	2,616	50.0	2,072	80.8	73.0	46.6	7.4	27.0	11.8	0.0	
Total	32	7,343	100.0	4,159	80.3	58.0	45.9	7.1	42.0	12.6	0.0	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data and Examiner Loan Sample.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues-Illinois											2017-2018	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Winnebago County	11	\$958	100.0	3,414	77.6	61.0	45.1	8.4	39	14.1	0.0	
Total	11	\$958	100.0	3,414	77.6	61.0	45.1	8.4	39	14.1	0.0	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data and Examiner Loan Sample.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues-Illinois											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Winnebago County	8	2,257	100.0	3,461	78.5	40.0	41.7	8.0	60.0	13.4	0.0	
Total	8	2,257	100.0	3,461	78.5	40.0	41.7	8.0	60.0	13.4	0.0	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data and Examiner Loan Sample.
Due to rounding, totals may not equal 100.0*