



PUBLIC DISCLOSURE

November 25, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Bangor
Charter Number 13202

1798 Commercial Street
Bangor, WI 54614

Office of the Comptroller of the Currency

222 South 9th Street, Suite 800
Minneapolis, MN 55402

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

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Overall CRA Rating

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the performance in the State of Wisconsin rating area.
- The loan-to-deposit (LTD) ratio is more than reasonable considering the bank's size, financial condition, and credit needs of the assessment area (AA).
- The majority of loans originated and purchased are inside the bank's AA.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The bank received no CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

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

The First National Bank of Bangor's (FNB Bangor) average quarterly loan-to-deposit ratio was 89.30 percent for the 18 quarters since the prior CRA examination, covering September 30, 2014 through December 31, 2018. The bank's LTD ratio steadily increased over the 18 quarters and was 103.06 percent at the end of the evaluation period. FNB Bangor ranked third among four similarly-situated banks, whose average quarterly LTD ratios ranged from 60.59 percent to 109.20 percent. Similarly-situated banks are those operating in La Crosse County with total assets between \$231 million and \$389 million.

Bank	Headquarters	Total Assets as of 12/31/18 (in 000s)	Average LTD Ratio
Citizens State Bank	La Crosse, WI	\$280,047	109.20%
Coulee Bank	La Crosse, WI	\$389,173	92.72%
The First National Bank of Bangor	Bangor, WI	\$230,926	89.30%
State Bank Financial	La Crosse, WI	\$345,972	60.59%

Lending in Assessment Area

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

FNB Bangor originated and purchased 78.75 percent of its total loans by number inside its AA during the evaluation period. By dollar, the bank originated and purchased 36.71 percent of loans inside the AA. We analyzed 40 small business loans and 40 consumer loans originated between January 1, 2016 and December 31, 2018 to determine the portion of lending inside the AA. There were three large

business loans outside the AA totaling \$5.15 million in the loan sample, which skewed the percentage by dollar. If the three loans were removed, 89.35 percent of the remaining sampled loans were inside the AA by dollar.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	33	82.50	7	17.50	40	\$2,925	34.98	\$5,438	65.02	\$8,364
Consumer	30	75.00	10	25.00	40	\$284	75.11	\$94	24.89	\$378
Total	63	78.75	17	21.25	80	\$3,209	36.71	\$5,533	63.29	\$8,742

Description of Institution

FNB Bangor is a \$231 million national bank headquartered in Bangor, Wisconsin. FNB Bangor has three full-service locations in Wisconsin, including the main office in Bangor and two branches in the nearby towns of Holmen and West Salem. FNB Bangor also operates two limited-hour branches located in Mindoro and St. Joseph Ridge. The limited-hour branches are open Monday, Wednesday, and Friday. All five locations offer the same deposit and loan products. There were no mergers or acquisitions, branch openings or closures, or any other significant corporate activity during the evaluation period. The bank does not operate any automated teller machines (ATMs).

FNB Bangor offers traditional deposit and loan products including commercial, consumer, residential real estate, and agricultural loans. As of December 31, 2018, outstanding loans total \$171.8 million. By dollar, the outstanding loan portfolio consists of 50 percent commercial loans, 35 percent home mortgage loans, 13 percent agricultural loans, and 2 percent consumer loans. Total loans represent 74 percent of total assets. Bank management has a conservative, low-risk strategy focused on maintaining the core customer base and strong capital levels. As of December 31, 2018, tier one capital totaled \$65.8 million and the bank's tier one leverage capital ratio was 30.0 percent.

FNB Bangor is 89.73 percent owned by Bosshard Banco, 3.67 percent owned by the Bosshard family, and 6.60 percent owned by other independent shareholders. The holding company, Bosshard Banco, had total assets of \$99.6 million as of December 31, 2018.

FNB Bangor received a "Satisfactory" rating at the prior CRA evaluation dated September 4, 2014. There are no legal or financial factors impeding the bank's ability to meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2016 through December 31, 2018. We determined FNB Bangor's primary loan products by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. Business loans and consumer loans are the primary products for this evaluation as they represent the largest volume of originations by dollar and number, respectively. Business loans represented 55 percent of total loan originations by dollar. Consumer loans represented 43 percent of total loan originations by number.

Given the changes in the demographic data used for comparison, loans originated and purchased in 2016 are analyzed separately from loans originated and purchased in 2017 and 2018. Loans originated or purchased in 2016 were compared to 2010 U.S. Census data. Loans originated or purchased in 2017 and 2018 were compared to 2015 American Community Service (ACS) survey data. We selected initial samples of 20 business loans and 20 consumer loans for 2016 and 20 business loans and 20 consumer loans for 2017-2018. Additional loans were selected as needed to have sufficient information to analyze borrower and geographic distributions within the AA.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state is selected for a full-scope review. For purposes of this evaluation, the bank has only one AA, La Crosse County. This AA was selected for a full-scope review and evaluated under the State of Wisconsin rating area.

Ratings

The bank's overall rating is based on its lending performance within the State of Wisconsin. It is the bank's only rating area. We evaluated lending performance using five performance criteria: the LTD ratio, lending in the AA, lending to borrowers of different income levels, distribution of loans to geographies of different income levels, and responses to CRA-related complaints.

Business loans received the most weight, followed by consumer loans, when determining the Lending Test conclusions. Business loans received more weight than consumer loans because they represented a larger percentage of total loan originations and purchases by dollar volume during the evaluation period. The 2017-2018 lending performance received more weight than 2016 because it was more recent and had higher loan volume by dollar and number.

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

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

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- FNB Bangor's distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- FNB Bangor received no CRA-related complaints during the evaluation period.
- Geographic distribution of loans throughout census tracts of different income levels is poor.

Description of Institution's Operations in Wisconsin

FNB Bangor has one AA in Wisconsin, the La Crosse County AA, which received a full-scope review. La Crosse County is part of the La Crosse-Onalaska WI-MN Multistate Metropolitan Statistical Area (MMSA). FNB Bangor's performance in the La Crosse County AA is considered under the State of Wisconsin rating area rather than a MMSA rating area because the AA contains only a Wisconsin county and no Minnesota counties.

FNB Bangor operates five locations in the AA in the towns of Bangor, Holmen, West Salem, St. Joseph Ridge, and Mindoro. There were no branches opened or closed during the evaluation period. The five branches are located in middle-income census tracts (CT). The bank operates no deposit-taking ATMs or cash-dispensing ATMs in the AA.

According to the 2010 U.S. Census data, there were 25 CTs in the AA. There was one low-income CT, four moderate-income CTs, 15 middle-income CTs, and five upper-income CTs. In 2017, the results of the 2015 ACS were released and provided updated demographics. According to the 2015 ACS, there were 25 CTs in the AA, consisting of one low-income CT, four moderate-income CTs, 14 middle-income CTs, five upper-income CTs, and one CT with an unknown income level. There are no distressed or underserved CTs in the AA during the evaluation period.

Competition within the AA is moderate. According to the FDIC Deposit Market Share Report as of June 30, 2018, FNB Bangor ranks seventh among 14 institutions with a deposit market share of 7.38 percent. FNB Bangor's primary competitors are Associated Bank, Wells Fargo, Coulee Bank, and River Bank with a combined deposit market share of 50.43 percent.

We discussed the local economy and the performance of local financial institutions with a member of the Village of Bangor Council. The community contact said that the local area has struggled recently due to the farm economy but continues to have low unemployment levels. The contact indicated the community has a need for home mortgage loans and business loans in order to retain existing citizens and businesses and promote growth of new businesses and housing developments. The contact

perceived local financial institutions, including FNB Bangor, are meeting the credit needs of the community and are actively involved in the community by sponsoring local events.

La Crosse MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: La Crosse WI MSA AA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	4.0	16.0	60.0	20.0	0.0
Population by Geography	114,638	4.8	13.9	64.6	16.7	0.0
Housing Units by Geography	47,745	4.5	13.6	65.4	16.5	0.0
Owner-Occupied Units by Geography	30,061	0.7	4.9	74.5	19.9	0.0
Occupied Rental Units by Geography	15,440	11.6	28.9	49.3	10.2	0.0
Vacant Units by Geography	2,244	7.0	24.8	53.2	15.0	0.0
Businesses by Geography	5,815	3.7	22.9	61.2	12.2	0.0
Farms by Geography	270	0.4	2.2	83.7	13.7	0.0
Family Distribution by Income Level	27,454	18.0	18.5	24.5	39.0	0.0
Household Distribution by Income Level	45,501	25.3	14.8	19.9	39.9	0.0
Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA		\$65,427	Median Housing Value			\$146,706
			Median Gross Rent			\$660
			Families Below Poverty Level			7.2%
<i>Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: La Crosse WI MSA AA 2017- 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	4.0	16.0	56.0	20.0	4.0
Population by Geography	117,048	2.1	15.7	60.3	17.7	4.2
Housing Units by Geography	49,008	2.7	17.5	60.4	17.9	1.6
Owner-Occupied Units by Geography	30,084	0.4	7.8	68.2	23.2	0.4
Occupied Rental Units by Geography	16,261	6.2	33.8	47.3	8.7	4.1
Vacant Units by Geography	2,663	7.2	27.6	52.3	12.8	0.0
Businesses by Geography	5,889	12.2	17.4	56.4	13.0	1.0
Farms by Geography	257	1.2	3.5	78.6	16.3	0.4
Family Distribution by Income Level	28,033	18.3	18.9	22.1	40.6	0.0
Household Distribution by Income Level	46,345	21.9	17.5	19.0	41.5	0.0
Median Family Income MSA - 29100 La Crosse-Onalaska, WI-MN MSA		\$68,531	Median Housing Value			\$155,655
			Median Gross Rent			\$761
			Families Below Poverty Level			6.7%
<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 rating for the State of Wisconsin is based wholly on the performance of the La Crosse County AA as it is the only AA in the state. The La Crosse County AA received a full-scope review. As previously discussed under the Scope of Evaluation section, business loans were weighted more heavily than consumer loans when arriving at conclusions.

LENDING TEST

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

Based on a full-scope review, the bank’s lending performance in the State of Wisconsin is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in the State of Wisconsin.

Loans to Small Businesses

Refer to Table Q in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of loans to businesses.

The geographic distribution of business loans to businesses in different income level CTs in the La Crosse County AA is poor. FNB Bangor's lending to businesses in low-income and moderate-income (LMI) CTs during the evaluation period is below demographics and aggregate CRA data. In 2017-2018, FNB Bangor made no business loans in a low-income CT and one business loan in a moderate-income CT. Geographic distribution of 2016 business loans was consistent with 2017-2018 performance. FNB Bangor does not have any branches in or near the city of La Crosse, WI, where the five LMI CTs are located. The bank's branches are spread in rural areas in the northern and eastern portion of La Crosse County. Loan competition in and near the city of La Crosse is strong with many branches of financial institutions available to adequately serve the LMI CTs. FNB Bangor's closest branch is approximately ten miles from these CTs, which is less convenient for those located in the LMI CTs.

Consumer Loans

Refer to Table U in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans to borrowers in different income level CTs in the La Crosse County AA is very poor. FNB Bangor's consumer lending in low-income and moderate-income CTs is below demographic comparators throughout the evaluation period. As previously indicated, the bank's very poor performance is explained by the branch locations in relation to the LMI CTs. FNB Bangor does not have any branches in or near the city of La Crosse. Banking competition in La Crosse is strong. Consumers living in La Crosse are less likely to drive to FNB Bangor's branches in different towns since other banks have branches conveniently located in La Crosse.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Loans to Small Businesses

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

The distribution of loans to business of different sizes is reasonable. In 2017-2018, the bank's performance lending to small businesses exceeds demographic and aggregate data. Small businesses are defined as those with annual gross revenue of \$1 million or less. Additionally, 15 percent of FNB Bangor's sampled loans had unknown gross revenues. Our conversations with lenders and use of the loan size as a proxy indicate that these loans were likely to small businesses. In 2016, the bank's performance lending to small businesses is near the demographic comparator and above aggregate. Additionally, 20 percent of FNB Bangor's sampled loans had unknown gross revenues. As indicated above, our conversations with the lenders and use of loan sizes as a proxy indicate that these loans were likely made to small businesses.

Consumer Loans

Refer to Table V in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to borrowers of different income levels is excellent. FNB Bangor consumer loan originations to low- and moderate-income borrowers significantly exceeds the percentage of LMI households in the AA.

Responses to Complaints

There were no CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the AAs 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:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Commercial and consumer loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wisconsin		
La Crosse AA	Full-scope	La Crosse County

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank of Bangor	
Overall Bank:	Lending Test Rating
First National Bank of Bangor	Satisfactory
MMSA or State:	
Wisconsin	Satisfactory

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.

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

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

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved,

denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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
La Crosse County	20	1,558	100.0	1,319	3.7	0.0	2.4	22.9	0.0	20.1	61.2	85.0	61.8	12.2	15.0	15.8	0.0	0.0	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA 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 **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
La Crosse County	20	3,222	100.0	1,153	12.7	0.0	10.7	17.4	5.0	14.8	56.1	95.0	57.8	12.9	0.0	16.4	1.0	0.0	0.3

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2016**

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
La Crosse County	20	1,558	100.0	1,319	75.1	70.0	43.7	8.6	10.0	16.3	20.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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**

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
La Crosse County	20	3,222	100.0	1,153	74.9	80.0	50.0	8.8	5.0	16.3	15.0

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
La Crosse County	20	187	100.0	4.4	0.0	13.1	0.0	66.0	85.0	16.6	15.0	0.0	0.0

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2017-2018**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
La Crosse County	20	417	100.0	2.4	0.0	16.9	0.0	60.8	80.0	18.1	20.0	1.7	0.0

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
La Crosse County	20	187	100.0	25.3	35.0	14.8	40.0	19.9	10.0	39.9	0.0	0.0	15.0	
<i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
La Crosse County	20	417	100.0	21.9	30.0	17.5	25.0	19.0	20.0	41.5	10.0	0.0	15.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>														