



PUBLIC DISCLOSURE

June 10, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Anchorbank, fsb
Charter Number 704474

25 W Main St
Madison, WI 53703-3329

Office of the Comptroller of the Currency
Washington DC

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

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Overall CRA Rating

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

The following table indicates the performance level of **Anchorbank, fsb** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Anchorbank, fsb Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Anchor’s lending levels reflect good responsiveness to assessment area credit needs.
- A substantial majority of loans originate within Anchor’s delineated assessment areas.
- Both geographic and borrower distribution meets standards in low- and moderate income areas and lending to low- and moderate- income borrowers.
- Community development activities are adequate.

Definitions and Common Abbreviations

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

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

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine

the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in ‘loans to small farms’ as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Description of Institution

AnchorBank, fsb (Anchor) is a \$2.4 billion intra-state bank with headquarters in Madison, Wisconsin. The bank currently has 54 full service branches and one lending-only office located in 17 different assessment areas across the state of Wisconsin. The bank's primary markets include the Madison MSA, Milwaukee MSA, as well as nine Non-MSA counties. Anchor is the sole subsidiary of AnchorBanCorp, also headquartered in Madison, Wisconsin. Anchor is principally a consumer oriented financial institution. The bank's business strategy is to provide superior personal service, customer convenience, and competitive products. Anchor offers a full range of retail deposit and lending products in addition to banking services for small business and commercial customers. Anchor also offers a full range of insurance and investment products through an operating subsidiary, Anchor Investment Services. The bank does not have any lending affiliates contributing to their CRA performance.

In May 2009, AnchorBanCorp and Anchor were placed under Office of Thrift Supervision (OTS) Cease and Desist orders for engaging in unsafe and unsound banking practices that resulted in insufficient liquidity and an inadequate level of capital for their risk profile. Anchor was required to incorporate specific plans to reduce debt levels of the Bancorp, improve debt to capital ratios, and implement operating strategies to achieve profitability. The bank was also required to implement strategies to reduce the level of classified assets and was restricted from growing total assets.

Anchor closed one branch office in Madison, Wisconsin in 2009 due to the lack of drive-up banking capability and limited parking at the branch. Anchor had additional full service branch offices located less than four miles from the closed office to provide services to any effected customers. The bank closed a loan production office in Hudson, Wisconsin in 2010. To further the bank's efforts to regain profitability Anchor sold 15 full service branches in 2010. The full service offices were located in smaller communities in northwest Wisconsin and in the Green Bay market. In addition, the bank closed two other offices located in Sussex, Wisconsin and Appleton, Wisconsin in 2012. There were no mergers or acquisitions made during this evaluation period.

To comply with the OTS Cease and Desist order Anchor ceased all commercial and commercial real estate, and community lending as well as portfolio lending for residential and consumer loans. The financial difficulties of the bank have forced Anchor to reduce lending as well as contributions and investments to qualified community organizations. During this evaluation period, Anchor has shrunk in asset size from \$5 billion to \$2.4 billion as of March 31, 2013.

As of March 31, 2013 total loans of \$1.8 billion represented 75 percent of total assets. Real estate loans make up 87.9 percent of the loan portfolio, loans to individuals are 10.3 percent, with commercial and other loans making up the balance. One to four family residential and home equity lending equal 50.8 percent of the real estate portfolio; multi-family loans are 22.6 percent; with construction/development and commercial real estate equaling 26.6 percent. The bank's Tier one capital ratio was only 4.5 percent as of March 31, 2013.

The OTS conducted Anchor's prior CRA evaluation. The evaluation is dated November 26, 2007 and the bank's CRA rating was "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this CRA assessment is November 27, 2007 (date of the prior Public Evaluation) through January 31, 2013. Anchor's performance under the lending test covered the time period January 1, 2008 through December 31, 2012. The bank's primary loan category is residential real estate loans. We used the bank's Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) reports for each of the five years under the lending test to evaluate the bank's residential mortgage lending. We also reviewed the bank's small business lending. We used the bank's corrected CRA small business reports for 2010, 2011 and 2012 to evaluate the significance of the bank's small business lending. Due to the low volume of small business lending in comparison to the bank's residential mortgage lending it was determined that this data would not impact our evaluation of the bank's overall CRA performance. CD activity was evaluated based on compiled internal bank reports. The evaluation period for CD activities is November 27, 2007 through January 31, 2013. We conducted a data integrity examination in the first quarter of 2013. We began our CRA examination on June 10, 2013.

Data Integrity

Our review of the bank's HMDA LAR data revealed no significant errors were reported. Samples were taken from the bank's HMDA LAR reports for the years 2010, 2011, and 2012. The bank's CRA small business data reports were also reviewed for 2010, 2011, and 2012. The results of our review of the bank's CRA data reflected significant errors in critical fields. The bank corrected each of these reports. The bank appropriately refiled their 2012 CRA data and placed prior years corrected reports in their CRA public file. At the start of this CRA examination, the bank was still in process of correcting the 2008 and 2009 CRA lending data. We were unable to validate these efforts and as such did not include that data in our evaluation. As noted elsewhere the overall loan volume of small business lending was not significant and small business lending did not impact the bank's CRA performance evaluation. We also verified the bank's CD activity as qualifying under the CRA. All data used and reported in this evaluation was validated as being accurate.

Selection of Areas for Full-Scope Review

We selected the following areas for full-scope reviews: Madison MSA; Milwaukee MSA; and the compiled Non-MSA AAs. These areas represented a significant majority of the bank's deposits as well as the majority of the bank's lending volume. See table below:

Assessment Area:	Madison MSA	Milwaukee MSA	Non-MSA AAs
Deposit* Percent Range 2008 through 2011	46.4 to 49.2	9.9 to 12.6	18.3 to 19.3
Deposit *Percent 2012	49.8	10.4	19.7
Loan Volume **Percent Range 2008 through 2011	42.5 to 44.7	9.6 to 9.8	20.8 to 21.5
Loan Volume **Percent 2012	44.4	12.3	20.5

* Deposits held by AA from FDIC annual market share reports.

** Number of HMDA loans reported originated or purchased in respective years.

Limited-scope areas include the following AAs: Appleton MSA; Eau Claire MSA; Fond du Lac MSA; Green Bay (2008 through 2010 only); Janesville MSA; Oshkosh MSA; Minneapolis-St. Paul-Bloomington, MN-WI (2008 through 2010 only.)

Please refer to Appendix A for more information.

Ratings

The bank's overall rating is based primarily on the bank's performance in those areas that received full-scope reviews. As stated above these areas represent the highest percent of Anchor's lending and deposit base. The lending analysis was done on residential real estate lending. Over the entire lending test evaluation period Anchor originated or purchased a total of 35,202 one to four family residential mortgage loans in their delineated AAs. Sixteen percent were home purchase loans; 8.3 percent were home improvement loans; and 75.7 percent were home refinancing loans. Home refinancing loans carried the most weight in our performance evaluation. Only a 113 multi-family loans were purchased or originated during the lending test evaluation period in the bank's delineated AAs. Based on the low volume of multi-family lending this loan category was not analyzed for this CRA evaluation. For small business lending in the years 2010, 2011 and 2012 Anchor only originated or purchased 70 loans in the bank's delineated AAs. It is noted that marginally higher volumes of small business lending did occur in 2008 and 2009 however; as stated above the bank was not able to correct all the small business data prior to the start of this examination and we were unable to validate the bank's efforts. Due to the very low volume of small business lending validated this loan category also was not analyzed for this CRA evaluation.

We reached conclusions for each one to four family residential loan product for each full-scope area. We then determined whether each limited-scope area's CRA performance was not inconsistent; or if inconsistent whether the performance in the limited scope AA was stronger or weaker than the overall conclusion for the full-scope areas. Our final overall conclusion was a compilation of each performance factor.

During this evaluation period two different sets of census data were applicable. For loans originated or purchased in 2008 through 2011 we based our analysis on 2000 census data. For loans originated or purchased in 2012 we based our analysis on 2010 census data. At the time of this evaluation 2012

aggregate lending data was not available as such we analyzed the bank's 2012 performance against 2011 aggregate lending data.

Our lending test analysis for 2011 was also segregated from 2008 through 2010 because during 2010 Anchor sold 15 branches that resulted in bank closing out of two limited scope market assessment areas. To evaluate the bank's performance in those two assessment areas we needed to reach performance conclusions for our full scope assessment areas for the applicable time frame when those branches were open and operating.

Deposit market share was determined using the FDIC's annual deposit market share reports. The most current data was dated June 30, 2012.

One set of tables is attached to this public evaluation showing 2012 bank data with 2011 aggregate lending data and 2010 census data.

Other

During this examination we contacted four community housing organizations. Two organizations primarily served the Milwaukee MSA market area, one organization served Dane County in the Madison MSA and the other community contact was a state-wide affordable housing organization. All of the contacts specifically mentioned the difficulties their clients have in meeting the higher underwriting standards financial institutions have adopted resulting from the recent real-estate recession. They mentioned additional difficulties in finding financial institutions willing to work with grant and down payment assistance money. Special mortgage lending programs for low- and moderate- income families is a credit need in all of the contacted market areas. Each community contact stressed the importance of the homeownership education mostly split between first time homebuyers conducted to prepare a client for the purchase and mortgage process and post homeownership education. Anchor was mentioned as a positive partner with these organizations. Anchor assists with both the homeownership education efforts as well as the home purchase and home refinancing efforts targeted to low- and moderate- income persons. Anchor's special mortgage products are viewed as viable options for low- and moderate- income persons.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 195.28(c) in determining a Federal savings association's (FSA) CRA rating the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the FSA or in any AA by an affiliate whose loans have been considered as part of the FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Madison MSA, Milwaukee MSA, and the combined Non-MSA AAs is good. Anchor has demonstrated a HIGH SATISFACTORY performance in meeting the credit needs of its AAs.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in appendix C for the facts and data used to evaluate the bank's lending activity. Our analysis of the bank's lending volume focused on the bank's deposit market share ranking in each AA in comparison to the most current residential loan market share ranking analysis. In reaching our conclusion we took into consideration Anchor's lending and growth restrictions as detailed in the OTS Cease and Desist Order.

Anchor's lending activity reflects good responsiveness to assessment area residential lending credit needs.

Madison MSA:

In 2010 Anchor ranked second out of 52 institutions for deposit market share in the Madison MSA. The bank ranked third (out of 50) in 2011 and fourth (out of 49) in 2012. For each year 2010 through 2012 these rankings placed the bank in the top four percentile, top six percentile, and top eight percentile respectively. The most current aggregate lending data for residential loans is as of 2011. For home purchase loans purchased or originated Anchor ranked tenth out of 208 home purchase lenders in the Madison MSA. This ranking placed the bank in the top five percent. For home improvement loans purchased or originated Anchor ranked third out of 89 home improvement lenders or in the top four percent. For home refinancing loans purchased or originated Anchor ranked second out of 286 home refinancing lenders in the Madison MSA. This ranking placed the bank in the top one percent.

Milwaukee MSA:

In 2010 Anchor ranked 19th out of 57 institutions for deposit market share in the Milwaukee MSA. The bank ranked 24th (out of 57) in 2011 and 26th (out of 456) in 2012. For each year 2010 through 2012 the rankings placed the bank in the top 33 percentile, top 42 percentile, and top 46 percentile respectively. The most current aggregate lending data for residential loans is as of 2011. For home purchase loans purchased or originated Anchor ranked 31st out of 267 home purchase lenders in the Milwaukee MSA. This ranking placed the bank in the top 12 percent. For home improvement loans purchased or originated Anchor ranked 14th out of 100 home improvement lenders or in the top 14 percent. For home refinancing loans purchased or originated Anchor ranked 30th out of 370 home refinancing lenders in the Milwaukee MSA. This ranking placed the bank in the top eight percent.

Non-MSA AAs:

In 2010 Anchor ranked second out of 76 institutions for deposit market share in the Non-MSA AAs. The bank ranked second (out of 62) in 2011 and remained second (out of 62) in 2012. For each year 2010 through 2012 these rankings placed the bank in the top three percentile for each year. The most current aggregate lending data for residential loans is as of 2011. For home purchase loans purchased or originated Anchor ranked third out of 246 home purchase lenders in the Non-MSA AAs. This ranking placed the bank in the top one percent. For home improvement loans purchased or originated Anchor ranked second out of 99 home improvement lenders or in the top two percent. For home refinancing loans purchased or originated Anchor ranked first out of 332 home refinancing lenders in the Non-MSA AAs. This ranking placed the bank in the top one percent.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans meets standards of satisfactory performance.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall Anchor's geographic distribution of residential lending reflects good distribution throughout the AAs. Geographic distribution of home purchase lending reflects good distribution throughout the AAs. Geographic distribution of home improvement lending reflects adequate distribution throughout the AAs. Geographic distribution of refinancing loans shows good distribution throughout the AAs.

Madison MSA:

Overall geographic distribution of home purchase lending in the Madison MSA is good. Overall geographic distribution of home improvement lending in the Madison MSA is adequate. Overall geographic distribution of refinancing loans in the Madison MSA is good.

2008 through 2010

The bank's geographic distribution of home purchase loans exceeds the standards for lending in low-income geographies as the percentage of home purchase loans originated or purchased significantly exceeded the aggregate lending percentage in low-income geographies. The bank's geographic distribution of home purchase loans meets the standards for lending in moderate-income geographies as the percentage of home purchase loans originated or purchased is near the aggregate lending percentage in moderate-income geographies.

The bank's geographic distribution of home improvement loans does not meet the standards for lending in low-income geographies as the percentage of home improvement loans originated or purchased is significantly less than the aggregate lending percentage in low-income geographies. The bank's geographic distribution of home improvement loans meets the standards for lending in moderate-income geographies as the percentage of home improvement loans originated or purchased is near the aggregate lending percentage in moderate-income geographies.

The bank's geographic distribution of refinancing loans meets the standards for lending in low- income geographies as the percentage of refinancing loans originated or purchased exceeds the aggregate lending percentage in low- income geographies. The bank's geographic distribution of refinancing loans meets the standards for lending in moderate- income geographies as the percentage of refinancing loans originated or purchased is near the aggregate lending percentage in moderate- income geographies.

2011

The bank's geographic distribution of home purchase loans meets the standards for lending in low- income geographies as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage in low- income geographies. The bank's geographic distribution of home purchase loans meets the standards for lending in moderate- income geographies as the percentage of home purchase loans originated or purchased is near the aggregate lending percentage in moderate- income geographies.

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2012

The bank's geographic distribution of home purchase loans exceeds the standards for lending in low- income geographies as the percentage of home purchase loans originated or purchased significantly exceeds the aggregate lending percentage in low- income geographies. The bank's geographic distribution of home purchase loans meets the standards for lending in moderate- income geographies as the percentage home purchase loans originated or purchased exceeds the aggregate lending percentage in moderate- income geographies.

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refinancing loans meets the standards for lending in moderate- income geographies as the percentage of refinancing loans originated or purchased is near the aggregate lending percentage in moderate- income geographies.

Milwaukee MSA:

Overall geographic distribution of home purchase lending in the Milwaukee MSA is good.

Overall geographic distribution of home improvement lending and refinancing loans in the Milwaukee MSA is adequate.

2008 through 2010

The bank's geographic distribution of home purchase loans exceeds the standards for lending in low- income geographies as the percentage of home purchase loans originated or purchased significantly exceeds the aggregate lending percentage in low- income geographies. The bank's geographic distribution of home purchase loans exceeds the standards for lending in moderate- income geographies as the percentage of home purchase loans originated or purchased significantly exceeds the aggregate lending percentage in moderate- income geographies.

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2011

The bank's geographic distribution of home purchase loans exceeds the standards for lending in low- income geographies as the percentage of home purchase loans originated or purchased significantly exceeds the aggregate lending percentage in low- income geographies. The bank's geographic distribution of home purchase loans meets the standards for lending in moderate- income geographies as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage in moderate- income geographies.

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2012

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Non-MSA AAs:

Overall geographic distribution of home purchase in the Non-MSA AAs is good. Overall geographic distribution of home improvement lending in the Non-MSA AAs is adequate. Overall geographic distribution of refinancing loans in the Non-MSA AAs is good.

There are no low-income geographies in Anchor's Non-MSA AAs (see Appendix B for details.)

2008 through 2010

The bank's geographic distribution of home purchase loans meets the standards for lending in moderate-income geographies. The percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage in moderate-income geographies.

The bank's geographic distribution of home improvement loans meets the standards for lending in moderate-income geographies. The percentage of home improvement loans originated or purchased exceeds the aggregate lending percentage in moderate-income geographies.

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2011

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2012

The bank's geographic distribution of home purchase loans meets the standards for lending in moderate-income geographies. The percentage home purchase loans originated or purchased is somewhat lower than the aggregate lending percentage in moderate- income geographies.

The bank's geographic distribution of home improvement loans does not meet the standards for lending in moderate- income geographies. The percentage of home improvement loans originated or purchased is significantly less than the aggregate lending percentage in moderate- income geographies.

The bank's geographic distribution of refinancing loans meets the standards for lending in moderate-income geographies. The percentage of refinancing loans originated or purchased exceeds the aggregate lending percentage in moderate- income geographies.

Lending Gap Analysis

Anchor exhibits an adequate record of serving the residential mortgage credit needs of the most economically disadvantaged areas and no unexplained lending gaps were noted.

Madison MSA:

During the evaluation period Anchor reported residential loan application activity in all low- and moderate- income census tracts. Market share performance for home purchase loans and refinancing loans reflects good performance and adequate performance for home improvement lending in the Madison MSA's low- and moderate- income census tracts. Overall, our lending analysis for the Madison MSA shows the bank's performance meets the standards for residential lending in low- and moderate- income areas. The most current market share data available is 2011.

Milwaukee MSA:

For the years 2008 through 2011 Anchor reported residential lending application activity in 63 percent of the low- income census tracts and 87 percent of the moderate- income census tracts. These levels of penetration reflect good performance. For 2012 Anchor reported lower levels of penetration with only

17 percent of low- income census tracts and 48 percent of moderate- income census tracts reporting residential lending application activity. Market share performance for home purchase lending reflects excellent performance in both low- and moderate- income census tracts. Market share performance for home improvement loans reflects good performance in both low- and moderate- income census tracts. Market share performance for refinancing loans shows inadequate performance in both low- and moderate- income census tracts. The most current market share data is 2011. Taking into consideration the lending and growth restrictions of the OTS Cease and Desist Order, Anchor's residential lending performance in low- and moderate- income census tracts for the Milwaukee MSA is adequate and meets the standards for residential lending in low- and moderate- income areas.

Non-MSA AAs:

Overall, our lending analysis for the Non-MSA AAs shows the bank's performance meets standards for residential lending in moderate- income areas. During the evaluation period Anchor reported residential loan application activity in all moderate- income census tracts. While market share performance for home purchase, home improvement, and refinancing loans reflects inadequate penetration in the moderate- income geographies, this inadequate performance is primarily due to the lending restrictions placed on the bank under the OTS Cease and Desist Order and not due to bank constructed geographic lending gaps. The most current market share data is 2011.

Inside/Outside Ratio

A substantial majority of Anchor's residential mortgage loans originated or purchased were within the bank's assessment areas.

We reviewed the bank's percentage of HMDA lending inside their designated AAs. Of the 39,533 HMDA loans originated or purchased for the years 2008 through 2012, 88.9 percent were inside the bank's AAs. The dollar value of loans originated or purchased inside the Anchor's AAs for the evaluation period also reflects a significant majority with 87.8 percent of the dollars originated or purchased within the bank's AA. This element constitutes a positive factor in the bank's CRA performance.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans meets standards of satisfactory performance.

Home Mortgage Loans

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

Overall Anchor's borrower distribution of residential lending reflects good distribution among borrowers of different income levels. Borrower distribution of home purchase lending reflects good distribution throughout the AAs. Borrower distribution of home improvement lending reflects adequate distribution throughout the AAs. Borrower distribution of refinancing loans shows good distribution throughout the AAs.

Madison MSA:

Overall borrower distribution of home purchase and home improvement lending and refinancing loans in the Madison MSA is good.

2008 through 2010

The bank's borrower distribution of home purchase loans meets the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans meets the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased is somewhat lower than the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans meets the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased equals the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

2011

The bank's borrower distribution of home purchase loans meets the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans meets the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans meets the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased equals the aggregate lending percentage to moderate-income borrowers.

2012

The bank's borrower distribution of home purchase loans exceeds the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased significantly exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans meets the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans meets the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased equals the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

Milwaukee MSA:

Overall borrower distribution of home purchase lending in the Milwaukee MSA is good. Overall borrower distribution of home improvement lending in the Milwaukee MSA is adequate. Overall borrower distribution of refinancing loans in the Milwaukee MSA is good.

2008 through 2010

The bank's borrower distribution of home purchase loans meets the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans does not meet the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased is significantly less than the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans meets the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

2011

The bank's borrower distribution of home purchase loans meets the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans meets the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans meets the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased is somewhat less than the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

2012

The bank's borrower distribution of home purchase loans exceeds the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased significantly exceeds the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans does not meet the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased is significantly less than the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans does not meet the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased is significantly less than the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased is somewhat less than the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

Non-MSA AAs:

Overall borrower distribution of home purchase lending in the Non-MSA AAs is good. Overall borrower distribution of home improvement lending in the Non-MSA AAs is adequate. Overall borrower distribution of refinancing loans in the Non-MSA AAs is good.

2008 through 2010

The bank's borrower distribution of home purchase loans meets the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans meets the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased is somewhat lower than the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans meets the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased equals the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

2011

The bank's borrower distribution of home purchase loans meets the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

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The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased is somewhat lower than the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

2012

The bank's borrower distribution of home purchase loans meets the standards for lending to low-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home purchase loans meets the standards for lending to moderate-income borrowers as the percentage of home purchase loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of home improvement loans meets the standards for lending to low-income borrowers as the percentage of home improvement loans originated or purchased is somewhat lower than the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of home improvement loans meets the standards for lending to moderate-income borrowers as the percentage of home improvement loans originated or purchased is near to the aggregate lending percentage to moderate-income borrowers.

The bank's borrower distribution of refinancing loans meets the standards for lending to low-income borrowers as the percentage of refinancing loans originated or purchased is near to the aggregate lending percentage to low-income borrowers. The bank's borrower distribution of refinancing loans meets the standards for lending to moderate-income borrowers as the percentage of refinancing loans originated or purchased exceeds the aggregate lending percentage to moderate-income borrowers.

Community Development Lending

Anchor's Community Development Lending performance is adequate.

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

Overall the bank's CD lending performance has been limited during this evaluation period and the bank has made a low level of community development loans. However, in taking into consideration the bank's financial condition and official supervisory restrictions the bank's CD lending performance is adequate. During the evaluation period Anchor extended 4 CD loans in the Madison MSA for a total of \$2.5 million. In each the Milwaukee MSA and Non-MSA AAs one CD loan was made for \$392 thousand and \$500 thousand, respectively. All of these CD loans were verified during our data integrity examination as qualified under the definitions of the CRA.

Anchor's CD efforts are focused on affordable housing. This is a definitive need throughout the bank's delineated AAs. The bank remains cognizant of community development projects that present opportunities such as lending consortiums and other affordable housing projects. However, Anchor's recent financial constraints limit the bank's participation or expansion in these developments. The bank continues to maintain current relationships and projects and will consider future opportunities as is appropriate to the bank's financial condition. Anchor's low level CD lending did not impact the bank's overall lending test performance rating.

Product Innovation and Flexibility

Anchor's development and participation in flexible residential lending products and programs is good. Anchor uses flexible lending practices in order to serve the affordable housing credit needs throughout their delineated community.

Anchor is involved in all of their delineated communities through relationships with community groups and non-profit organizations whose focus is on providing and developing affordable home ownership for low- and moderate- income residents. In the past Anchor supported these organizations through financial contributions and offering unique home loan programs tailored to each group's client base. Despite the financial constraints the bank continues to assist low- and moderate- income borrowers achieve homeownership. The bank participates with twenty-seven different community organizations that promote homebuyer education and many offer down payment assistance for first time homebuyers. In addition to down payment assistance, these organizations offer monies for closing costs and/or rehabilitation funding programs. Whenever Anchor can, these programs are paired with a first mortgage loan originated by Anchor.

Anchor promotes mortgage loan programs such as New Neighbor, WHEDA, My Community Mortgage and Rural Development Guarantee funding the home purchases or refinancings of low- and moderate-income borrowers.

New Neighbor is a suite of residential mortgage products developed by Anchor to provide purchase money for low- and moderate- income borrowers. These are portfolio loan products and the bank retains the mortgage servicing rights. A New Neighbor loan can be used to purchase or refinance a single family detached or a warrantable condominium home. Flexible credit guidelines and no requirement for mortgage insurance make this program a desirable option for new homebuyers. Purchase borrowers must contribute some of their own savings to the transaction. The first mortgage loans are combinable with approved community second loans with provisions for combined loan to value as high as 103 percent. Existing New Neighbor ARM customers can refinance their current mortgage loan for a lower fixed rate. The suite of products includes three types of thirty year fixed rate mortgages. The first two fixed rate loan alternatives are for households who are buying their first home or who have not owned a home during the past three years. One loan option is available specifically in the Milwaukee MSA while the other loan option is open for Anchor's other AAs. An applicant's income cannot exceed 80 percent of the county median income unless the home is located in a Wisconsin Housing and Economic Development Authority (WHEDA) targeted census tract. The third fixed rate product is designed as a refinance loan for current homeowners who are existing New Neighbor mortgage clients. The suite of products also includes a five-year adjustable rate mortgage amortized over 30 years. The adjustable rate loan option is also restricted by the above income limits or geography designation. During the evaluation period Anchor originated 711 New Neighbor loans for a total of \$82.8 million.

Anchor originates and table funds WHEDA mortgages. Anchor originated WHEDA loans up to November 2008 when WHEDA suspended their HOME mortgage loan program. In 2008 Anchor originated 43 loans for \$4.8 million. WHEDA reemerged in the mortgage market with a new Wisconsin Neighborhood Advantage mortgage product in June 2009. The new program focused on qualified buyers who elected to purchase homes that had gone through the foreclosure process. These homes often needed repairs. WHEDA paired their first mortgage with National Stabilization Program (NSP)

funds. Borrowers benefited when their homes were repaired and they moved into safe, sound and sanitary homes financed with a WHEDA first mortgage and a NSP forgivable loan. Anchor originated eight loans for \$608.4 thousand of WHEDA Wisconsin Neighborhood Advantage mortgages paired with \$246 thousand of NSP forgivable loans. WHEDA introduced Fannie Mae Advantage in February 2010. This loan program was developed using Fannie Mae's loan program for Housing Finance Authorities.

Anchor exhibits a good record of serving the credit needs of the most economically disadvantaged areas in its AAs as well as the credit needs of the low- and moderate- income individuals, consistent with safe and sound banking practices. Anchor's portfolio of flexible home lending products is a positive factor in the bank's overall lending test performance rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance under the lending test in the Appleton MSA, Eau Claire MSA, Fond du Lac MSA, Green Bay MSA, Janesville MSA, Minneapolis MSA, and Oshkosh MSA is not inconsistent with the bank's overall SATISFACTORY performance under the lending test. Refer to Tables 1 through 13 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Madison MSA, Milwaukee MSA, and Non-MSA AAs is adequate.

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

Due to the strict covenants of the OTS's Cease and Desist Order Anchor's financial ability to participate in community development investments over this evaluation period has been limited. Investments made consist of grants or contributions to local community development organizations. Many of these organizations provide community development services to low- and moderate- income persons. The bank also financially supported community development affordable housing and financial literacy initiatives. Financial literacy, affordable housing and CD services are all documented needs in Anchor's delineated market place. There were no qualified investments in the broader statewide or regional area made for performance consideration. CD opportunities exist throughout the bank's AAs.

Madison MSA:

Recognizing the limited investment capacity of the bank during this evaluation period, Anchor provided an adequate level of qualified community development investments and grants. The bank exhibited adequate responsiveness to credit and community economic development needs in the Madison MSA. The bank's contributions primarily supported affordable housing and financial literacy initiatives. During the evaluation period Anchor contributed over \$54 thousand in qualified community development investment funds. These monies went to ten different local community organizations.

Milwaukee MSA:

Taking into consideration the limited investment capacity of the bank during this evaluation period, Anchor provided an adequate level of qualified community development investments and grants. The bank exhibited adequate responsiveness to credit and community economic development needs in the Milwaukee MSA. The bank’s contributions primarily supported affordable housing and financial literacy initiatives. During the evaluation period Anchor contributed over \$69 thousand in qualified community development investment funds. These monies went to nine different local community organizations.

Non-MSA AAs:

During this evaluation period Anchor’s community development investment capacity was severely limited. However, Anchor provided an adequate level of qualified community development investments and grants in the Non-MSA AAs. The bank exhibited adequate responsiveness to credit and community economic development needs in the Non-MSA AAs. The bank’s contributions primarily supported affordable housing and financial literacy initiatives. During the evaluation period Anchor contributed over \$16 thousand in qualified community development investment funds. These monies went to twelve different local community organizations.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s overall performance under the Investment Test in the Appleton MSA, Eau Claire MSA, Fond du Lac MSA, Green Bay MSA, Janesville MSA, Minneapolis MSA, and Oshkosh MSA is not inconsistent with the bank’s overall SATISFACTORY performance under the investment test. Refer to Table 14 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Service Test is rated “Low Satisfactory.” Based on full-scope reviews, the bank’s performance in the Madison MSA, Milwaukee MSA, and the NON-MSA AAs is adequate.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

Madison MSA:

Retail services are adequate for the Madison MSA.

Delivery systems are reasonably assessable to the AA, particularly to low- and moderate- income geographies and to low- and moderate- income persons. The bank operates 20 full service branch offices in the AA with ATMs located at each branch office. Although Anchor does not have any branches located in the low- income census tracts the bank's distribution of branches in moderate- income geographies matches the percentage of the population living within the moderate- income census tracts. The bank's services do not vary in any way that inconveniences the AA, particularly low- and moderate- income individuals or low- or moderate- income areas.

Banking hours provide reasonable accommodation to everyone with extended hours for drive-up services. Weekend hours are available except for a loan production office and one upper- income branch location. Anchor offers a wide range of traditional deposit and banking products. The bank offers alternative delivery systems through telephone and on-line banking, electronic bill pay and mobile banking options.

To the extent changes have been made, Anchor's closing of branches has not adversely affected the accessibility or its delivery systems, particularly in low- and moderate- income areas or to low- and moderate- income individuals.

**Milwaukee MSA:
Retail Services are adequate for the Milwaukee MSA.**

Delivery systems are reasonably assessable to essentially all portions of the AA. Anchor has a limited branch presence in this MSA. The bank now operates only seven full service branch offices in the AA with ATMs located at each branch office. Although Anchor does not have any branches located in the low- income census tracts the bank's distribution of branches in moderate- income geographies is near the percentage of the population living within the moderate- income census tracts. The bank's services do not vary in any way that inconveniences the AA, particularly low- and moderate- income individuals or low- or moderate- income areas.

Banking hours provide reasonable accommodation to everyone with extended hours for drive-up services. Weekend hours are available at all Milwaukee MSA branch locations. Anchor offers a wide range of traditional deposit and banking products. The bank offers alternative delivery systems through telephone and on-line banking, electronic bill pay and mobile banking options.

To the extent changes have been made, Anchor's closing of branches has not adversely affected the accessibility or its delivery systems, particularly in low- and moderate- income areas or to low- and moderate- income individuals.

**NON-MSA AAs:
Retail Services are adequate for the Non-MSA AAs.**

Delivery systems are readily assessable to all portions of the Non-MSA AAs, particularly to moderate- income geographies and to low- and moderate- income persons. The bank operates 13 full service branch offices in the Non-MSA AAs with ATMs located at each branch office. Anchor's distribution of branches in moderate- income geographies significantly exceeds the percentage of the population living within the moderate- income census tracts. The bank's services do not vary in any way that inconveniences the AA, particularly low- and moderate- income individuals or moderate- income areas.

Banking hours provide reasonable accommodation to everyone with extended hours for drive-up services. Weekend hours are available at all Non-MSA AA's branch locations. Anchor offers a wide range of traditional deposit and banking products. The bank offers alternative delivery systems through telephone and on-line banking, electronic bill pay and mobile banking options.

To the extent changes have been made, Anchor's closing of branches has not adversely affected the accessibility or its delivery systems, particularly in moderate- income areas or to low- and moderate-income individuals.

Community Development Services

Anchor provides an adequate level of CD services in the Madison MSA, Milwaukee MSA, and Non-MSA AAs.

Anchor has an Affordable Housing Unit that provides technical assistance to non-profit and government organizations whose development and revitalization programs serve low- and moderate- income individuals or target low- and moderate- income census tracts. Anchor's CD services are centered in homeownership educational programs. Bank staff uses their affordable housing financial expertise to assist in the development of various training programs. These training programs are used to educate low- and moderate- income homebuyers, CD housing organizations as well as local and state government agencies on best practices and programs available. Down payment assistance, budgeting, and forward planning are all topics taught to low- and moderate- income individuals at many forums throughout the bank's AAs. Anchor personnel provided technical assistance to CD housing organizations and local and state government housing authorities on available housing subsidy and assistance programs as they relate to applicant qualification guidelines and mortgage loan underwriting standards, and Real Estate Settlement Procedure Act issues. In the Madison AA the bank lent their financial wherewithal to 13 different CD organizations. In the Milwaukee AA and Non-MSA AAs Anchor contributed financial expertise to 11 and three, respectively, local CD organizations. Staff readily provided assistance in teaching financial literacy and first time homebuyer's classes multiple times over the course of each year with each organization.

Anchor is a member of Federal Home Loan Bank of Chicago. Anchor administers and participates in the Federal Home Loan Bank's AHP Subsidy Programs. This activity allows Anchor to extend home ownership opportunities to many low- and moderate- income individuals. The availability of the AHP subsidy makes homeownership happen by making purchase money funds available to home buyers who may not have all the funds they need to cover the costs of purchasing a home with a conventional mortgage. Anchor serves as either the lead Member Bank or as a consortium Member Bank and has administered loans and disbursed funds from 33 AHP Subsidy projects totaling 620 loans for a total of \$3.9 million. Anchor verifies compliance, prepares mortgage documents, funds and services these loans. The bank prepares and reviews and approves requests for reimbursement from the Federal Home Loan Bank, tracks, and monitors these loans on an on-going basis. Anchor performs these activities without charging fees.

Anchor's adequate level of responsiveness to meeting the needs of its delineated communities was the primary factor in our evaluation of the bank's CD service performance assessment. All CD services were validated as meeting the requirements of the CRA during our data integrity examination.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance under the Service Test in the Appleton MSA, Eau Claire MSA, Fond du Lac MSA, Green Bay MSA, Janesville MSA, Minneapolis MSA, and Oshkosh MSA is not inconsistent with the bank's overall SATISFACTORY performance under the service test. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/08 to 12/31/12) Investment and Service Tests and CD Loans: (11/26/07 to 01/31/13)	
Financial Institution	Products Reviewed	
AnchorBank, fsb (Anchor) Madison, WI	Residential Mortgage Lending	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Appleton #11540	Limited Scope	Closed in 2010
Eau Claire #20740	Limited Scope	
Fond du Lac #22540	Limited Scope	
Green Bay #24580	Limited Scope	
Janesville #27500	Limited Scope	
Madison #31540	Full Scope	
Milwaukee #33340	Full Scope	
Minneapolis, WI #33460	Limited Scope	
Oshkosh #36780	Limited Scope	Closed in 2010
NON-MSA	Full Scope	
Counties include:		
Crawford		
Grant		
Green		
Green Lake		
Portage		
Richland		
Vernon		
Walworth		
Waushara		

Appendix B: Market Profiles for Full-Scope Areas

Demographic Information for Full-Scope Area: Madison #31540						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	111	4.50	17.12	60.36	16.22	1.80
Population by Geography	501,774	6.44	16.67	60.58	16.31	0.00
Owner-Occupied Housing by Geography	121,867	0.58	15.02	65.27	19.14	0.00
Businesses by Geography	54,969	3.48	13.95	62.42	20.15	0.00
Farms by Geography	2,667	0.45	14.02	70.75	14.77	0.00
Family Distribution by Income Level	122,011	16.01	19.36	28.49	36.14	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	43,163	4.53	24.11	61.40	9.96	0.00
Median Family Income	= \$61,050					
HUD Adjusted Median Family Income for XXXX	= \$81,800					
Households Below the Poverty Level	=9%					
				Median Housing Value	= \$146,636	
				Unemployment Rate	= 2.25%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2011 HUD updated MFI.

Demographic Information for Full-Scope Area: Madison #31540						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	125	7.20	16.00	54.40	20.00	2.40
Population by Geography	568,593	5.97	15.49	57.71	20.27	0.55
Owner-Occupied Housing by Geography	146,782	1.45	12.91	63.51	22.13	0.00
Businesses by Geography	54,223	4.15	16.14	57.34	21.88	0.49
Farms by Geography	2,710	0.41	10.15	71.85	17.38	0.22
Family Distribution by Income Level	136,215	18.54	18.27	25.18	38.01	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	50,148	5.63	22.68	59.22	12.47	0.00
Median Family Income	= \$78,201					
HUD Adjusted Median Family Income for XXXX	= \$82,900					
Households Below the Poverty Level	=11%					
				Median Housing Value	= \$225,161	
				Unemployment Rate	= 2.90%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census, and 2012 HUD updated MFI.

Anchor's Madison AA consists of the entire MSA, which includes Columbia, Dane, and Iowa Counties. In the Madison AA Anchor has 20 branch locations or 36 percent of the total number of branches. The deposit base for the Madison AA equals \$1.127 billion or 50 percent of the bank's total deposits as of June 30, 2012.

Anchor has continued to focus their lending strategy on helping to meet the affordable housing needs in their delineated communities. During this evaluation period the bank's level of participation has been greatly restricted due to the safety and soundness concerns outlined in the OTS Cease and Desist Order. The bank continues to lend monies in their communities to the fullest extent possible while achieving and maintaining compliance with their supervisory orders. Affordable housing was confirmed during our community contacts conducted during this examination as being a predominate credit need within the Madison MSA.

The Madison MSA job market is dominated by state government University of Wisconsin, and medical and educational professions. The largest employer in Madison is the Wisconsin state government, excluding employees of the University of Wisconsin–Madison, and University of Wisconsin Hospital and Clinics employees, although both groups of workers are state employees. Madison's economy today is evolving from a government-based economy to a consumer services and high-tech base, particularly in the health, biotech and advertising sectors. From the June 2013 Bureau of Labor Statistics the unemployment rate in the Madison area is 5.2 percent, below the State of Wisconsin unemployment rate of 6.8 percent.

Banking competition in the area is high. June 2013 FDIC deposit market share reports show 52 deposit financial institutions located in the Madison MSA. The latest (2011) HMDA market share reports show over 200 residential lenders originating or purchasing loans in the Madison MSA.

Demographic Information for Full-Scope Area: Milwaukee #33340						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	416	18.99	19.95	37.98	22.36	0.72
Population by Geography	1,500,741	11.87	16.37	42.27	29.29	0.19
Owner-Occupied Housing by Geography	359,082	4.46	12.07	46.58	36.88	0.00
Businesses by Geography	119,366	7.28	13.38	42.50	36.29	0.55
Farms by Geography	2,098	2.34	5.62	49.43	42.52	0.10
Family Distribution by Income Level	383,799	19.84	17.89	23.61	38.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	144,827	20.54	24.36	40.13	14.97	0.00
Median Family Income HUD Adjusted Median Family Income for XXXX Households Below the Poverty Level	= \$56,640 = \$72,300 =10%		Median Housing Value Unemployment Rate	= \$125,318 = 2.73%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2011 HUD updated MFI.

Demographic Information for Full-Scope Area: Milwaukee #33340						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	429	20.05	17.95	35.20	26.57	0.23
Population by Geography	1,555,908	14.65	16.20	36.13	33.02	0.00
Owner-Occupied Housing by Geography	386,906	6.74	12.89	39.84	40.52	0.00
Businesses by Geography	116,999	9.87	14.13	37.00	38.96	0.04
Farms by Geography	2,131	3.28	6.71	43.41	46.60	0.00
Family Distribution by Income Level	389,825	22.15	16.90	20.61	40.35	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	152,194	25.76	23.63	33.19	17.42	0.00
Median Family Income HUD Adjusted Median Family Income for XXXX Households Below the Poverty Level	= \$68,787 = \$73,200 =12%		Median Housing Value Unemployment Rate	= \$203,186 = 3.98%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI.

Anchor's Milwaukee AA consists of the entire MSA, which includes Milwaukee, Ozaukee, Washington and Waukesha Counties. In the Milwaukee AA Anchor currently has seven branch locations or 13 percent of the total number of branches. One branch in the Milwaukee AA was closed in 2012. The deposit base for the Milwaukee AA equals \$236 million or 10 percent of the bank's total deposits as of June 30, 2012.

Anchor has continued to focus their lending strategy on helping to meet the affordable housing needs in their delineated communities. During this evaluation period the bank's level of participation has been greatly restricted due to the safety and soundness concerns outlined in the OTS Cease and Desist Order. The bank continues to lend monies in their communities to the fullest extent possible while achieving and maintaining compliance with their supervisory orders. Affordable housing was confirmed during our community contacts conducted during this examination as being a predominate credit need within the Milwaukee MSA.

The Milwaukee MSA job market is now dominated by the health care industry and retail and service organizations. The Milwaukee area has been evolving from a goods producing employment base to a more service based economy. From the June 2013 Bureau of Labor Statistics the unemployment rate in the Milwaukee area is 7.7 percent, above the State of Wisconsin unemployment rate of 6.8 percent.

Banking competition in the area is high. June 2013 FDIC deposit market share reports show 57 deposit financial institutions located in the Milwaukee MSA. The latest (2011) HMDA market share reports show over 300 residential lenders originating or purchasing loans in the Milwaukee MSA.

Demographic Information for Full-Scope Area: NON-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	78	0.00	5.13	80.77	14.10	0.00
Population by Geography	349,667	NA	4.31	76.15	19.54	NA
Owner-Occupied Housing by Geography	97,437	NA	4.54	74.66	20.80	NA
Businesses by Geography	32,148	NA	5.16	76.11	18.73	NA
Farms by Geography	3,594	NA	5.65	79.91	14.44	NA
Family Distribution by Income Level	90,732	15.21	18.99	25.83	39.98	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	31,025	NA	6.93	79.76	13.31	NA
Median Family Income HUD Adjusted Median Family Income for XXXX Households Below the Poverty Level	= \$46,680 = \$59,100 =9%				Median Housing Value Unemployment Rate	= \$101,056 = 2.72%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2011 HUD updated MFI.

Demographic Information for Full-Scope Area: NON-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	87	0.00	4.60	74.71	20.69	0.00
Population by Geography	368,282	NA	4.03	71.81	24.16	NA
Owner-Occupied Housing by Geography	107,590	NA	3.93	70.26	25.81	NA
Businesses by Geography	30,551	NA	4.92	72.32	22.76	NA
Farms by Geography	3,588	NA	3.68	75.78	20.54	NA
Family Distribution by Income Level	96,271	16.44	18.13	23.54	41.89	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	33,277	NA	6.08	76.05	17.88	NA
Median Family Income HUD Adjusted Median Family Income for XXXX Households Below the Poverty Level	= \$57,384 = \$59,900 =12%				Median Housing Value Unemployment Rate	= \$155,200 = 3.20%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI.

Anchor's Non-MSA AAs consist of the following entire counties in the State of Wisconsin: Crawford, Grant, Green, Green Lake, Portage, Richland, Vernon, Walworth and Waushara. In the Non-MSA AAs the bank has 13 branch locations or 23 percent of the total number of branches. The deposit base for the Non-MSA AAs equals \$445 million or 20 percent of the bank's total deposits.

Anchor has continued to focus their lending strategy on helping to meet the affordable housing needs in their delineated communities. During this evaluation period the bank's level of participation has been greatly restricted due to the safety and soundness concerns outlined in the OTS Cease and Desist Order. The bank continues to lend monies in their communities to the fullest extent possible while achieving and maintaining compliance with their supervisory orders. Affordable housing was confirmed during our community contacts conducted during this examination as being a predominate credit need within the Non-MSA AAs.

The economy of Wisconsin is driven by manufacturing, agriculture, and health care. Highest occupation numbers in the Non-MSA areas in Wisconsin are in administrative positions, production, transportation and sales. From the June 2013 Bureau of Labor Statistics the unemployment rate in the State of Wisconsin is 6.8 percent.

Banking competition in the area is high. June 2013 FDIC deposit market share reports show 76 deposit financial institutions located in the Non-MSA AAs. The latest (2011) HMDA market share reports show over 300 residential lenders originating or purchasing loans in the Non-MSA AAs.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For

borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

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

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

Table 1. Lending Volume

LENDING VOLUME												
Geography: ANCHORBANK 2012						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012						
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Madison WI MSA for Census 2010	44.36	3,149	509,935	5	1,844	0	0	4	2,493	3,158	514,272	49.81
Milwaukee WI MSA for Census 2010	12.25	870	141,164	1	130	0	0	1	392	872	141,686	10.42
WI NonMSA Counties for 2011 for Census 2010	20.46	1,454	177,480	1	208	0	0	1	500	1,456	178,188	19.67
Limited Review:												

* Loan Data as of December 31, 2012. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from November 27, 2007 to January 31, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

LENDING VOLUME	Geography: ANCHORBANK 2012					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012						
Appleton WI MSA 1 county for Census 2010	5.23	369	49,094	3	790	0	0	0	0	372	49,884	3.56
Eau Claire WI MSA for Census 2010	4.44	316	39,496	0	0	0	0	0	0	316	39,496	4.46
Fond du Lac WI MSA for Census 2010	0.44	31	2,961	0	0	0	0	0	0	31	2,961	0.53
Janesville WI MSA for Census 2010	4.96	353	41,108	0	0	0	0	0	0	353	41,108	4.55
Oshkosh-Neenah WI MSA for Census 2010	7.85	557	67,190	1	225	0	0	0	0	558	67,415	7.00

Table 1. Other Products

LENDING VOLUME		Geography: ANCHORBANK 2012				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012								
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Madison WI MSA for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Milwaukee WI MSA for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
WI NonMSA Counties for 2011 for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Limited Review:														

* Loan Data as of December 31, 2012. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

LENDING VOLUME	Geography: ANCHORBANK 2012											Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012		
Appleton WI MSA 1 county for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Eau Claire WI MSA for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Fond du Lac WI MSA for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Janesville WI MSA for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Oshkosh-Neenah WI MSA for Census 2010	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

Table 1. Other Products

LENDING VOLUME				
Geography: ANCHORBANK 2012		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012		
Assessment Area (2012):	Other Unsecured Consumer Loans*		Other Optional Loans*	
	#	\$ (000's)	#	\$ (000's)
Full Review:				
	0	0	0	0
Madison WI MSA for Census 2010	0	0	0	0
Milwaukee WI MSA for Census 2010	0	0	0	0
WI NonMSA Counties for 2011 for Census 2010	0	0	0	0
Limited Review:				

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

LENDING VOLUME	Geography: ANCHORBANK 2012		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012	
Appleton WI MSA 1 county for Census 2010	0	0	0	0
Eau Claire WI MSA for Census 2010	0	0	0	0
Fond du Lac WI MSA for Census 2010	0	0	0	0
Janesville WI MSA for Census 2010	0	0	0	0
Oshkosh-Neenah WI MSA for Census 2010	0	0	0	0

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ANCHORBANK 2012					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Madison WI MSA for Census 2010	379	40.41	1.45	1.58	12.91	12.40	63.51	60.16	22.13	25.86	0.56	10.31	63.16	25.96
Milwaukee WI MSA for Census 2010	149	15.88	6.74	5.37	12.89	12.08	39.84	42.95	40.52	39.60	1.58	8.57	47.42	42.44
WI NonMSA Counties for 2011 for Census 2010	197	21.00	0.00	0.00	3.93	1.52	70.26	72.59	25.81	25.89	0.00	2.11	71.10	26.79
Limited Review:														
Appleton WI MSA 1 county for Census 2010	48	5.12	0.00	0.00	4.46	0.00	83.32	85.42	12.21	14.58	0.00	5.98	82.78	11.24
Eau Claire WI MSA for Census 2010	47	5.01	0.00	0.00	11.92	14.89	73.51	80.85	14.57	4.26	0.00	8.92	75.33	15.75
Fond du Lac WI MSA for Census 2010	2	0.21	0.00	0.00	6.15	0.00	85.44	100.00	8.42	0.00	0.00	0.00	91.56	8.44
Janesville WI MSA for Census 2010	35	3.73	4.55	0.00	15.66	14.29	55.87	57.14	23.92	28.57	0.00	10.32	63.90	25.78
Oshkosh-Neenah WI MSA for Census 2010	81	8.64	0.00	0.00	10.85	7.41	69.87	65.43	19.27	27.16	0.00	5.00	69.25	25.76

* Based on 2011 Aggregate Lending Data

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

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

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

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: ANCHORBANK 2012				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				Aggregate HMDA Lending (%) by Tract Income*			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans				
Full Review:														
Madison WI MSA for Census 2010	143	31.22	1.45	0.70	12.91	11.19	63.51	69.93	22.13	18.18	0.22	10.86	68.44	20.47
Milwaukee WI MSA for Census 2010	42	9.17	6.74	0.00	12.89	9.52	39.84	26.19	40.52	64.29	2.78	9.08	45.53	42.61
WI NonMSA Counties for 2011 for Census 2010	139	30.35	0.00	0.00	3.93	1.44	70.26	76.26	25.81	22.30	0.00	3.09	71.53	25.39
Limited Review:														
Appleton WI MSA 1 county for Census 2010	35	7.64	0.00	0.00	4.46	2.86	83.32	77.14	12.21	20.00	0.00	3.64	85.91	10.45
Eau Claire WI MSA for Census 2010	30	6.55	0.00	0.00	11.92	6.67	73.51	86.67	14.57	6.67	0.00	9.93	71.58	18.49
Fond du Lac WI MSA for Census 2010	5	1.09	0.00	0.00	6.15	0.00	85.44	100.00	8.42	0.00	0.00	0.00	89.50	10.50
Janesville WI MSA for Census 2010	15	3.28	4.55	0.00	15.66	20.00	55.87	46.67	23.92	33.33	0.00	16.53	64.88	18.60
Oshkosh-Neenah WI MSA for Census 2010	49	10.70	0.00	0.00	10.85	6.12	69.87	65.31	19.27	28.57	0.00	3.86	71.36	24.77

* Based on 2011 Aggregate Data

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

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

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

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ANCHORBANK 2012				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Madison WI MSA for Census 2010	2,627	46.06	1.45	1.18	12.91	9.52	63.51	62.58	22.13	26.72	0.40	9.80	62.42	27.38
Milwaukee WI MSA for Census 2010	679	11.91	6.74	0.44	12.89	5.60	39.84	34.46	40.52	59.50	0.92	4.80	41.97	52.31
WI NonMSA Counties for 2011 for Census 2010	1,118	19.60	0.00	0.00	3.93	2.15	70.26	69.95	25.81	27.91	0.00	1.88	66.49	31.64
Limited Review:														
Appleton WI MSA 1 county for Census 2010	286	5.01	0.00	0.00	4.46	4.55	83.32	70.98	12.21	24.48	0.00	3.88	83.22	12.90
Eau Claire WI MSA for Census 2010	239	4.19	0.00	0.00	11.92	10.46	73.51	79.92	14.57	9.62	0.00	8.18	71.27	20.55
Fond du Lac WI MSA for Census 2010	24	0.42	0.00	0.00	6.15	0.00	85.44	95.83	8.42	4.17	0.00	0.00	86.89	13.11
Janesville WI MSA for Census 2010	303	5.31	4.55	0.99	15.66	9.90	55.87	49.50	23.92	39.60	0.00	5.58	60.73	33.69
Oshkosh-Neenah WI MSA for Census 2010	427	7.49	0.00	0.00	10.85	9.60	69.87	57.85	19.27	32.55	0.00	3.36	65.62	31.02

^{*} Based on 2011 Aggregate Data

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

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

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

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ANCHORBANK 2012					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Madison WI MSA for Census 2010	0	0.00	15.84	0.00	22.56	0.00	42.37	0.00	19.23	0.00	13.53	9.77	54.14	22.56
Milwaukee WI MSA for Census 2010	0	0.00	15.39	0.00	15.91	0.00	45.42	0.00	23.28	0.00	15.71	24.57	43.71	16.00
WI NonMSA Counties for 2011 for Census 2010	0	0.00	0.00	0.00	6.71	0.00	76.40	0.00	16.89	0.00	0.00	2.44	73.17	24.39
Limited Review:														
Appleton WI MSA 1 county for Census 2010	0	0.00	0.00	0.00	14.94	0.00	80.67	0.00	4.39	0.00	0.00	0.00	92.31	7.69
Eau Claire WI MSA for Census 2010	0	0.00	0.00	0.00	15.41	0.00	65.47	0.00	19.11	0.00	0.00	28.00	60.00	12.00
Fond du Lac WI MSA for Census 2010	0	0.00	0.00	0.00	40.14	0.00	55.33	0.00	4.53	0.00	0.00	0.00	100.00	0.00
Janesville WI MSA for Census 2010	0	0.00	11.54	0.00	22.44	0.00	38.68	0.00	27.34	0.00	0.00	40.00	40.00	20.00
Oshkosh-Neenah WI MSA for Census 2010	0	0.00	0.00	0.00	27.85	0.00	58.95	0.00	13.20	0.00	0.00	3.70	88.89	7.41

* Based on

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multifamily units in a particular geography divided by the number of multi-family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: ANCHORBANK 2012		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012											
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*																
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Low	Mod	Mid	Upp													
Full Review:																											
Madison WI MSA for Census 2010	5	45.45	4.15	0.00	16.14	0.00	57.34	60.00	21.88	40.00	3.27	13.68	60.41	22.64													
Milwaukee WI MSA for Census 2010	1	9.09	9.87	0.00	14.13	0.00	37.00	100.00	38.96	0.00	4.99	9.67	41.32	44.02													
WI NonMSA Counties for 2011 for Census 2010	1	9.09	0.00	0.00	4.92	0.00	72.32	100.00	22.76	0.00	0.00	2.46	67.63	29.91													
Limited Review:																											
Appleton WI MSA 1 county for Census 2010	3	27.27	0.00	0.00	11.02	0.00	79.82	66.67	9.16	33.33	0.00	9.34	76.40	14.26													
Eau Claire WI MSA for Census 2010	0	0.00	0.00	0.00	14.89	0.00	72.25	0.00	12.86	0.00	0.00	19.49	63.54	16.97													
Fond du Lac WI MSA for Census 2010	0	0.00	0.00	0.00	17.75	0.00	76.56	0.00	5.69	0.00	0.00	0.00	91.36	8.64													
Janesville WI MSA for Census 2010	0	0.00	7.49	0.00	18.48	0.00	47.48	0.00	26.54	0.00	0.00	16.06	53.80	30.14													
Oshkosh-Neenah WI MSA for Census 2010	1	9.09	0.00	0.00	15.76	0.00	66.57	100.00	17.66	0.00	0.00	5.89	68.39	25.72													

* Based on 2011 Aggregate Lending Data

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

*** Source Data - Dun and Bradstreet (2012).

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS														Geography: ANCHORBANK 2012				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income [*]										
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	Low	Mod	Mid	Upp							
Full Review:																					
Madison WI MSA for Census 2010	0	0.00	0.41	0.00	10.15	0.00	71.85	0.00	17.38	0.00	0.00	23.79	63.45	12.76							
Milwaukee WI MSA for Census 2010	0	0.00	3.28	0.00	6.71	0.00	43.41	0.00	46.60	0.00	0.00	0.00	72.62	27.38							
WI NonMSA Counties for 2011 for Census 2010	0	0.00	0.00	0.00	3.68	0.00	75.78	0.00	20.54	0.00	0.00	2.53	83.78	13.68							
Limited Review:																					
Appleton WI MSA 1 county for Census 2010	0	0.00	0.00	0.00	1.17	0.00	81.64	0.00	17.18	0.00	0.00	0.00	98.40	1.60							
Eau Claire WI MSA for Census 2010	0	0.00	0.00	0.00	14.95	0.00	70.81	0.00	14.24	0.00	0.00	0.92	92.66	6.42							
Fond du Lac WI MSA for Census 2010	0	0.00	0.00	0.00	1.80	0.00	88.91	0.00	9.30	0.00	0.00	0.00	91.56	8.44							
Janesville WI MSA for Census 2010	0	0.00	1.68	0.00	5.17	0.00	70.25	0.00	22.91	0.00	0.00	0.00	73.62	26.38							
Oshkosh-Neenah WI MSA for Census 2010	0	0.00	0.00	0.00	3.68	0.00	85.66	0.00	10.66	0.00	0.00	0.00	73.58	26.42							

^{*} Based on

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

^{***} Source Data - Dun and Bradstreet (2012).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ANCHORBANK 2012					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ¹	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Madison WI MSA for Census 2010	379	40.41	18.54	19.19	18.27	22.70	25.18	24.59	38.01	33.51	11.39	27.23	27.23	34.11
Milwaukee WI MSA for Census 2010	149	15.88	22.15	18.88	16.90	25.87	20.61	22.38	40.35	32.87	11.53	26.05	25.05	37.38
WI NonMSA Counties for 2011 for Census 2010	197	21.00	16.44	7.65	18.13	20.41	23.54	17.35	41.89	54.59	7.86	24.04	24.58	43.52
Limited Review:														
Appleton WI MSA 1 county for Census 2010	48	5.12	17.20	20.83	19.09	20.83	26.03	22.92	37.68	35.42	20.55	29.61	22.44	27.40
Eau Claire WI MSA for Census 2010	47	5.01	19.00	13.64	19.12	18.18	23.80	22.73	38.08	45.45	14.38	27.33	27.19	31.10
Fond du Lac WI MSA for Census 2010	2	0.21	17.50	50.00	18.65	0.00	26.85	50.00	37.01	0.00	15.04	28.69	29.11	27.16
Janesville WI MSA for Census 2010	35	3.73	19.66	12.12	18.49	30.30	22.32	21.21	39.53	36.36	19.61	29.10	26.17	25.12
Oshkosh-Neenah WI MSA for Census 2010	81	8.64	18.03	5.00	18.42	26.25	25.56	23.75	37.99	45.00	12.82	27.79	26.56	32.84

^{*} Based on 2011 Aggregate Lending Data

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by BANK.

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

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT														Geography: ANCHORBANK 2012		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012	
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]						
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Low	Mod	Mid	Upp			
Full Review:																	
Madison WI MSA for Census 2010	143	31.22	18.54	8.45	18.27	22.54	25.18	36.62	38.01	32.39	9.70	21.97	30.23	38.11			
Milwaukee WI MSA for Census 2010	42	9.17	22.15	0.00	16.90	9.52	20.61	28.57	40.35	61.90	10.09	19.88	27.48	42.55			
WI NonMSA Counties for 2011 for Census 2010	139	30.35	16.44	5.11	18.13	21.17	23.54	27.01	41.89	46.72	7.71	22.04	25.09	45.16			
Limited Review:																	
Appleton WI MSA 1 county for Census 2010	35	7.64	17.20	0.00	19.09	11.43	26.03	37.14	37.68	51.43	13.12	23.15	30.09	33.64			
Eau Claire WI MSA for Census 2010	30	6.55	19.00	6.67	19.12	13.33	23.80	53.33	38.08	26.67	13.26	22.22	26.88	37.63			
Fond du Lac WI MSA for Census 2010	5	1.09	17.50	0.00	18.65	20.00	26.85	40.00	37.01	40.00	9.66	22.22	39.13	28.99			
Janesville WI MSA for Census 2010	15	3.28	19.66	14.29	18.49	35.71	22.32	21.43	39.53	28.57	10.62	25.66	31.86	31.86			
Oshkosh-Neenah WI MSA for Census 2010	49	10.70	18.03	8.16	18.42	10.20	25.56	24.49	37.99	57.14	6.51	21.16	26.28	46.05			

^{*} Based on 2011 Aggregate Lending Data

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

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

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

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

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: ANCHORBANK 2012				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]										
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Low	Mod	Mid	Upp							
Full Review:																					
Madison WI MSA for Census 2010	2,627	46.06	18.54	7.31	18.27	22.74	25.18	29.93	38.01	40.03	7.30	21.03	29.02	42.66							
Milwaukee WI MSA for Census 2010	679	11.91	22.15	3.26	16.90	16.17	20.61	23.59	40.35	56.97	6.04	16.35	26.29	51.32							
WI NonMSA Counties for 2011 for Census 2010	1,118	19.60	16.44	5.23	18.13	18.68	23.54	27.62	41.89	48.47	5.65	16.52	25.66	52.17							
Limited Review:																					
Appleton WI MSA 1 county for Census 2010	286	5.01	17.20	5.61	19.09	17.54	26.03	26.32	37.68	50.53	9.96	22.23	28.58	39.23							
Eau Claire WI MSA for Census 2010	239	4.19	19.00	6.72	19.12	15.97	23.80	26.05	38.08	51.26	8.34	19.93	27.85	43.89							
Fond du Lac WI MSA for Census 2010	24	0.42	17.50	12.50	18.65	12.50	26.85	25.00	37.01	50.00	8.16	24.76	31.03	36.04							
Janesville WI MSA for Census 2010	303	5.31	19.66	5.70	18.49	23.49	22.32	28.19	39.53	42.62	8.42	21.51	30.85	39.21							
Oshkosh-Neenah WI MSA for Census 2010	427	7.49	18.03	1.91	18.42	18.62	25.56	26.49	37.99	52.98	5.41	16.46	26.34	51.79							

^{*} Based on 2011 Aggregate Lending Data

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

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

^{****} As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ANCHORBANK 2012			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Madison WI MSA for Census 2010	5	45.45	70.42	40.00	20.00	20.00	60.00	0	0
Milwaukee WI MSA for Census 2010	1	9.09	70.55	100.00	0.00	100.00	0.00	0	0
WI NonMSA Counties for 2011 for Census 2010	1	9.09	76.33	100.00	0.00	100.00	0.00	0	0
Limited Review:									
Appleton WI MSA 1 county for Census 2010	3	27.27	73.36	33.33	33.33	33.33	33.33	0	0
Eau Claire WI MSA for Census 2010	0	0.00	75.41	0.00	0.00	0.00	0.00	0	0
Fond du Lac WI MSA for Census 2010	0	0.00	74.86	0.00	0.00	0.00	0.00	0	0
Janesville WI MSA for Census 2010	0	0.00	72.62	0.00	0.00	0.00	0.00	0	0
Oshkosh-Neenah WI MSA for Census 2010	1	9.09	72.34	0.00	0.00	100.00	0.00	0	0

^{*} Based on 2011 Aggregate Lending Data

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

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ANCHORBANK 2012			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Madison WI MSA for Census 2010	0	0.00	97.71	0.00	0.00	0.00	0.00	0	0
Milwaukee WI MSA for Census 2010	0	0.00	96.15	0.00	0.00	0.00	0.00	0	0
WI NonMSA Counties for 2011 for Census 2010	0	0.00	98.10	0.00	0.00	0.00	0.00	0	0
Limited Review:									
Appleton WI MSA 1 county for Census 2010	0	0.00	96.48	0.00	0.00	0.00	0.00	0	0
Eau Claire WI MSA for Census 2010	0	0.00	98.89	0.00	0.00	0.00	0.00	0	0
Fond du Lac WI MSA for Census 2010	0	0.00	97.00	0.00	0.00	0.00	0.00	0	0
Janesville WI MSA for Census 2010	0	0.00	97.49	0.00	0.00	0.00	0.00	0	0
Oshkosh-Neenah WI MSA for Census 2010	0	0.00	98.16	0.00	0.00	0.00	0.00	0	0

* Based on 2011 Aggregate Lending Data

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2012).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: ANCHORBANK 2008 through 2012									
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012									
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Madison WI MSA for Census 2010	0	0	16	55	16	55	30.22	0	0
Milwaukee WI MSA for Census 2010	0	0	18	70	18	70	38.46	0	0
WI NonMSA Counties for 2011 for Census 2010	0	0	23	17	23	17	9.34	0	0
Limited Review:									
Appleton WI MSA 1 county for Census 2010	0	0	9	15	9	15	8.24	0	0
Eau Claire WI MSA for Census 2010	0	0	5	9	5	9	4.95	0	0
Fond du Lac WI MSA for Census 2010	0	0	2	1	2	1	0.55	0	0
Janesville WI MSA for Census 2010	0	0	4	3	4	3	1.65	0	0
Oshkosh-Neenah WI MSA for Census 2010	0	0	3	4	3	4	2.20	0	0
Green Bay MSA for Census 2000	0	0	3	3	3	3	1.65	0	0
Minneapolis MSA for Census 2000	0	0	3	5	3	5	2.74	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: ANCHORBANK 2012				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Madison WI MSA for Census 2010	49.81	20	35.71	0.00	15.00	60.00	25.00	0	0	0	0	0	0	5.97	15.49	57.71	20.27
Milwaukee WI MSA for Census 2010	10.42	8	14.29	0.00	12.50	37.50	50.00	0	1	0	0	-1	0	14.65	16.20	36.13	33.02
WI NonMSA Counties for 2011 for Census 2010	19.67	13	23.21	0.00	15.39	76.92	7.69	0	0	0	0	0	0	0.00	4.03	71.81	24.16
Limited Review:																	
Appleton WI MSA 1 county for Census 2010	3.56	4	7.14	0.00	25.00	75.00	0.00	0	1	0	-1*	0	0	0.00	6.12	81.74	12.14
Eau Claire WI MSA for Census 2010	4.46	3	5.36	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	12.22	71.26	16.52
Fond du Lac WI MSA for Census 2010	0.53	1	1.79	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	12.31	79.11	8.58
Janesville WI MSA for Census 2010	4.55	2	3.57	50.00	50.00	0.00	0.00	0	0	0	0	0	0	7.98	17.27	51.83	22.92
Oshkosh-Neenah WI MSA for Census 2010	7.00	5	8.93	0.00	0.00	40.00	60.00	0	0	0	0	0	0	0.00	16.29	67.13	16.58

*This branch was closed in 2012 and reflects the income category for 2010 Census Data (moderate- income census tract), per 2000 Census Data this branch was in a middle- income census tract.

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM		Geography: ANCHORBANK 2012						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012									
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches*	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Madison WI MSA for Census 2010	49.81	20	37.04	0.00	15.00	60.00	25.00	20	37.04	0.00	15.00	60.00	25.00	5.97	15.49	57.71	20.27
Milwaukee WI MSA for Census 2010	10.42	7	12.96	0.00	14.29	28.57	57.14	7	12.96	0.00	12.50	37.50	50.00	14.65	16.20	36.13	33.02
WI NonMSA Counties for 2011 for Census 2010	19.67	13	24.07	0.00	15.39	76.92	7.69	13	24.07	0.00	15.39	76.92	7.69	0.00	4.03	71.81	24.16
Limited Review:																	
Appleton WI MSA 1 county for Census 2010	3.56	3	5.56	0.00	0.00	100.00	0.00	3	5.56	0.00	25.00	75.00	0.00	0.00	6.12	81.74	12.14
Eau Claire WI MSA for Census 2010	4.46	3	5.56	0.00	33.33	66.67	0.00	3	5.56	0.00	33.33	66.67	0.00	0.00	12.22	71.26	16.52
Fond du Lac WI MSA for Census 2010	0.53	1	1.85	0.00	0.00	100.00	0.00	1	1.85	0.00	0.00	100.00	0.00	0.00	12.31	79.11	8.58
Janesville WI MSA for Census 2010	4.55	2	3.70	50.00	50.00	0.00	0.00	2	3.70	50.00	50.00	0.00	0.00	7.98	17.27	51.83	22.92
Oshkosh-Neenah WI MSA for Census 2010	7.00	5	9.26	0.00	0.00	40.00	60.00	5	9.26	0.00	0.00	40.00	60.00	0.00	16.29	67.13	16.58

*These branch numbers reflect the two branches closed during 2012 as shown in the prior table.

