



## **PUBLIC DISCLOSURE**

June 17, 2019

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank of Hartford  
Charter Number 8671

116 West Sumner Street  
Hartford, WI 53027

Office of the Comptroller of the Currency  
1200 North Mayfair Road, Suite 200  
Wauwatosa, WI 53226

**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 lending test is rated Satisfactory.**

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment areas (AAs).
- A substantial majority of loan originations are made within the bank's AAs.
- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of business loans reflects reasonable distribution among geographies.

### **Loan-to-Deposit Ratio**

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

The bank's quarterly LTD ratio averaged 74.30 percent over the 20 quarters spanning from June 30, 2014 to March 31, 2019. The bank ranks last in its peer group that includes 11 other similarly situated banks, with peer bank LTD ratios ranging from 75.49 percent to 104.57 percent during the same time period. The banks in this peer group have total assets ranging from \$51 million to \$316 million.

### **Lending in Assessment Area**

A substantial majority of the bank's loan originations are made inside its AAs.

A random sample of the bank's primary loan products shows that 81.3 percent of total loans by number and 76.2 percent of total loans by dollar amount were originated within its AAs.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	155	81.6	35	18.4	190	28,370	80.6	6,843	19.4	35,213
2017	77	79.4	20	20.6	97	15,570	80.7	3,735	19.3	19,305
2018	103	74.6	35	25.4	138	21,982	62.5	13,179	37.5	35,161
<b>Subtotal</b>	<b>335</b>	<b>78.8</b>	<b>90</b>	<b>21.2</b>	<b>425</b>	<b>65,922</b>	<b>73.5</b>	<b>23,757</b>	<b>26.5</b>	<b>89,679</b>
Small Business										
2016	33	94.3	2	5.7	35	7,246	99.2	55	0.8	7,301
2017/2018	36	97.3	1	2.7	37	3,940	92.7	310	7.3	4,250
<b>Subtotal</b>	<b>69</b>	<b>95.8</b>	<b>3</b>	<b>4.2</b>	<b>72</b>	<b>11,186</b>	<b>96.8</b>	<b>365</b>	<b>3.2</b>	<b>11,551</b>
<b>Total</b>	<b>404</b>	<b>81.3</b>	<b>93</b>	<b>18.7</b>	<b>497</b>	<b>77,108</b>	<b>76.2</b>	<b>24,122</b>	<b>23.8</b>	<b>101,230</b>
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0</i>										

## Description of Institution

The First National Bank of Hartford (FNB Hartford) is a \$211 million bank headquartered in Hartford, Wisconsin. The bank is wholly owned by FNB Hartford Bancorp, Inc. The bank operates two full-service branches. The main office and one of the bank's branches are located in middle-income census tracts (CTs) in Slinger, Wisconsin. The other branch in Hubertus, Wisconsin, is located in an upper-income CT. The Automated Teller Machines (ATM) located at each branch are non-deposit-taking ATMs. There have been no branch openings or closings since the last CRA evaluation.

The bank offers traditional, noncomplex loan and deposit products and services, as well as non-deposit investment products. There have been no significant changes to the products and services since the prior evaluation. As of March 31, 2019, the loan portfolio represented 74.04 percent of total assets. By dollar volume, the loan portfolio consists of 67.06 percent commercial loans, 30.75 percent residential real estate loans, 1.80 percent agricultural loans, and 0.39 percent consumer loans. Tier 1 capital totals \$25 million.

FNB Hartford has two AAs, one of which includes 49 CTs, located in the Milwaukee-Waukesha-West Allis, Wisconsin metropolitan statistical area (MSA). This AA includes all of Washington County and a portion of Ozaukee and Waukesha Counties. Given the bank's asset size, available resources, and limited branch locations, the designation of the entire Milwaukee-Waukesha-West Allis MSA would be too large for the bank to reasonably serve. The non-MSA AA includes only four CTs in Dodge County, which is located west of Washington County. Both AAs comply with regulatory requirements and do not arbitrarily exclude any low- or moderate-income geographies.

There are no legal or financial impediments limiting the bank's ability to meet the credit needs of its AAs. FNB Hartford's last CRA evaluation was dated March 25, 2014, using Small Bank procedures. The bank received a Satisfactory rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated FNB Hartford's performance under the Small Bank Lending Test. The Lending Test assesses the bank's record of meeting the credit needs of its AAs through lending activities. We reviewed data for the bank's primary loan products, commercial loans and home mortgage loans, to evaluate the bank's lending performance.

This evaluation covers the period since the prior CRA examination, March 25, 2014, through June 17, 2019. The Lending Test evaluated loans originated between January 1, 2016 and December 31, 2018.

In order to provide more current and accurate demographic data, the federal banking agencies are now updating census data every five years instead of 10, beginning with the Census Bureau's 2015 American Community Survey (ACS). FNB Hartford's AAs were affected by this change, and the data from 2016 received a separate analysis from the lending data from 2017 through 2018. As a result, performance tables have been separated and include 2017 through 2018 analysis only. Data is discussed in the applicable narrative sections of the evaluation.

To evaluate lending, we used data from bank reports and a random sample of home mortgage and business loans originated in the bank's AAs. Our lending analysis utilized the most recent available demographic and aggregate peer lending data.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB Hartford Milwaukee MSA - 2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	49	0.0	2.0	51.0	46.9	0.0
Population by Geography	229,137	0.0	2.0	51.4	46.5	0.0
Housing Units by Geography	93,235	0.0	1.9	53.6	44.5	0.0
Owner-Occupied Units by Geography	70,463	0.0	1.5	48.7	49.8	0.0
Occupied Rental Units by Geography	17,919	0.0	4.3	72.2	23.5	0.0
Vacant Units by Geography	4,853	0.0	0.0	55.4	44.6	0.0
Businesses by Geography	10,577	0.0	2.1	56.5	41.5	0.0
Farms by Geography	588	0.0	0.3	51.5	48.1	0.0
Family Distribution by Income Level	65,036	11.8	15.5	22.1	50.6	0.0
Household Distribution by Income Level	88,382	14.4	13.4	17.6	54.7	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha-West Allis, WI MSA		\$70,200	Median Housing Value			\$254,095
			Median Gross Rent			\$809
			Families Below Poverty Level			2.9%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data.</i>						
<i>Due to rounding, totals may not equal 100.0.</i>						
<i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB Hartford Milwaukee MSA - 2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	49	0.0	0.0	53.1	46.9	0.0
Population by Geography	231,490	0.0	0.0	51.6	48.4	0.0
Housing Units by Geography	95,780	0.0	0.0	53.3	46.7	0.0
Owner-Occupied Units by Geography	72,005	0.0	0.0	48.3	51.7	0.0
Occupied Rental Units by Geography	19,119	0.0	0.0	73.4	26.6	0.0
Vacant Units by Geography	4,656	0.0	0.0	47.5	52.5	0.0
Businesses by Geography	11,313	0.0	0.0	56.4	43.6	0.0
Farms by Geography	602	0.0	0.0	50.7	49.3	0.0
Family Distribution by Income Level	65,906	11.8	14.8	21.5	51.9	0.0
Household Distribution by Income Level	91,124	14.2	12.6	16.7	56.4	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha-West Allis, WI MSA		\$77,300	Median Housing Value			\$239,904
			Median Gross Rent			\$883
			Families Below Poverty Level			3.3%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data.</i>						
<i>Due to rounding, totals may not equal 100.0.</i>						
<i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

**Milwaukee MSA**

According to Data USA, the largest industries in the AA are health care and social assistance, manufacturing, and retail trade. Manufacturing includes occupations such as paper mills, construction machinery manufacturing, and machine tool manufacturing. Major employers in Washington County include Quad Graphics, Broan-Nutone, Signicast, and Sno-Way International.

The annual unemployment rate as of December 2018 for Ozaukee County was 2.2 percent, Washington County was 2.3 percent, and Waukesha County was 2.4 percent. The annual unemployment rate for the State of Wisconsin was 2.8 percent during the same time period.

There is competition in the area from several other financial institutions. The bank ranks 21st for deposit market share when compared to 49 other financial institutions in the AA. The bank’s deposit market share as of June 30, 2018 was 0.93 percent. Other competing financial institutions had a deposit market share ranging from 0.01 percent (Marathon Savings Bank) to 16.56 percent (BMO Harris Bank, N.A.)

**Community Contact**

We spoke with a community contact from a local Economic Development Authority. Overall, the needs of the community are being met by local financial institutions.

**Table A – Demographic Information of the Assessment Area**

**Assessment Area: FNB Hartford Non-MSA 2016**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	0.0	25.0	75.0	0.0
Population by Geography	18,997	0.0	0.0	23.2	76.8	0.0
Housing Units by Geography	7,929	0.0	0.0	24.5	75.5	0.0
Owner-Occupied Units by Geography	5,811	0.0	0.0	22.3	77.7	0.0
Occupied Rental Units by Geography	1,565	0.0	0.0	27.3	72.7	0.0
Vacant Units by Geography	553	0.0	0.0	40.0	60.0	0.0
Businesses by Geography	745	0.0	0.0	18.0	82.0	0.0
Farms by Geography	144	0.0	0.0	26.4	73.6	0.0
Family Distribution by Income Level	5,281	12.6	15.6	21.8	50.0	0.0
Household Distribution by Income Level	7,376	14.0	14.8	17.8	53.5	0.0
Median Family Income Non-MSAs - WI		\$60,200	Median Housing Value			\$191,451
			Median Gross Rent			\$737
			Families Below Poverty Level			3.7%

Source: 2010 U.S. Census and 2016 D&B Data.

Due to rounding, totals may not equal 100.0.

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB Hartford Non-MSA - 2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	0.0	75.0	25.0	0.0
Population by Geography	19,035	0.0	0.0	72.6	27.4	0.0
Housing Units by Geography	7,939	0.0	0.0	74.5	25.5	0.0
Owner-Occupied Units by Geography	5,636	0.0	0.0	72.1	27.9	0.0
Occupied Rental Units by Geography	1,653	0.0	0.0	78.5	21.5	0.0
Vacant Units by Geography	650	0.0	0.0	84.8	15.2	0.0
Businesses by Geography	850	0.0	0.0	71.8	28.2	0.0
Farms by Geography	131	0.0	0.0	71.8	28.2	0.0
Family Distribution by Income Level	5,291	14.2	14.4	27.0	44.4	0.0
Household Distribution by Income Level	7,289	17.8	12.0	19.2	51.0	0.0
Median Family Income Non-MSAs - WI		\$67,800	Median Housing Value			\$183,249
			Median Gross Rent			\$809
			Families Below Poverty Level			5.1%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data. Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

### **Non-MSA**

The largest industries in the AA are health care, manufacturing, and retail trade. Top employers in Dodge County include Quad Graphics, John Deere Company, Beaver Dam Community Hospitals, and Seneca Foods Corporation.

The annual unemployment rate as of December 2018 for Dodge County was 2.4 percent. The annual unemployment rate for the State of Wisconsin was 2.8 percent during the same time period.

### **LENDING TEST**

The bank's performance under the Lending Test is rated Satisfactory. Based on 2016 demographic data in the Milwaukee MSA AA, the bank had no low-income CTs and only one moderate-income CT, which is located in Washington County. Based on 2018 demographic data, the bank had no low- or moderate-income CTs. Based on demographic data for 2016 and 2018 in the non-MSA AA, the bank had no low- or moderate-income CTs. Therefore, an analysis would not provide meaningful information.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits reasonable geographic distribution of loans in its AAs. The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of business loans reflects reasonable distribution among geographies.

### ***Home Mortgage Loans***

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.



**Milwaukee MSA AA**

Based on 2016 demographic data, the bank had one moderate-income CT located in Washington County. The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in this AA. The bank originated 2.1 percent of home mortgage loans in a moderate-income geography. The percentage of the bank's originated loans exceeds the demographics that show 1.5 percent of owner-occupied housing is in moderate-income geographies. The bank's originated loans also exceed the percentage of aggregate peer lending data, which shows 1.5 percent of peer home mortgage lending was in moderate-income geographies.

**Non-MSA AA**

Based on 2018 demographic data, there were no low- or moderate-income CTs in this AA during the evaluation period; therefore, an analysis would not provide meaningful information.

***Small Loans to Businesses***

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

**Milwaukee MSA AA**

The geographic distribution of business loans reflects reasonable distribution among geographies. There are no low-income CTs in this AA. Based on our sample, the bank did not originate any loans in the moderate-income CT.

**Non-MSA AA**

Based on 2018 demographic data, there were no low- or moderate-income CTs in this AA during the evaluation period; therefore, an analysis would not provide meaningful information.

**Distribution of Loans by Income Level of the Borrower**

The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.

***Home Mortgage Loans***

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

***2016 Conclusions*****Milwaukee MSA**

The borrower distribution of home mortgage loans within this AA reflects reasonable distribution among borrowers of different incomes. The bank originated 5.7 percent of its home mortgages to low-income families, which is less than the demographics that show 11.8 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate peer lending data, which shows 3.6 percent of peer lending within the AA was to low-income families. The bank originated 12.1 percent of home mortgages to moderate-income families, which is below the demographics that show 15.5 percent of families in the AA are moderate-income. The bank's lending is

in line with aggregate peer lending data, which shows 12.5 percent of peer lending within the AA was to moderate-income families.

**Non-MSA**

The bank originated 14 loans in the non-MSA AA for 2016. Since this volume is below 20, we will not analyze the borrower distribution.

***2017-2018 Conclusions***

**Milwaukee MSA**

The borrower distribution of home mortgage loans within this AA reflects reasonable distribution among borrowers of different incomes. The bank originated 7.4 percent of its home mortgages to low-income families, which is below the demographics that show 11.8 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate peer lending data, which shows 4.1 percent of peer lending within the AA was to low-income families. The bank originated 21.5 percent of home mortgages to moderate-income families, which exceeds the demographics that show 14.8 percent of families in the AA are moderate-income. The bank's lending also exceeds the aggregate peer lending data, which shows 13.5 percent of peer lending within the AA was to moderate-income families.

**Non-MSA**

The bank originated 17 loans in the non-MSA AA for 2017-2018. Since this volume is below 20, we will not analyze the borrower distribution.

***Small Loans to Businesses***

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

***2016 Conclusions***

**Milwaukee MSA**

The borrower distribution of loans reflects reasonable distribution among businesses of different sizes. Our random sample shows the bank originated 68.2 percent of its business loans to AA small businesses (businesses with gross annual revenues of \$1.0 million or less). The bank's lending is below the demographics that shows 77.8 percent of AA businesses are small businesses. The bank's lending exceeds the aggregate peer lending data, which shows 41.4 percent of peer business lending in the AA was to small businesses.

**Non-MSA**

The bank originated 11 loans in the non-MSA for 2016. Since this volume is below 20, we will not analyze the borrower distribution.

***2017-2018 Conclusions***

**Milwaukee MSA**

The borrower distribution of loans reflects reasonable distribution among businesses of different sizes. Our random sample shows the bank originated 76.0 percent of its business loans to AA small businesses. The bank's lending is slightly less than the demographics that shows 77.9 percent of AA businesses are

small businesses. The bank's lending exceeds the aggregate peer lending data, which shows 50.4 percent of peer business lending in the AA was to small businesses.

***Non-MSA***

The bank originated 11 loans in the non-MSA AA for 2017-2018. Since this volume is below 20, we will not analyze the borrower distribution.

**Responses to Complaints**

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practices during this evaluation.

## Appendix A: Scope of Examination

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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 MSAs and non-MSAs 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”.

<b>Time Period Reviewed:</b>	January 1, 2016 through December 31, 2018	
<b>Bank Products Reviewed:</b>	Home mortgage and small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>None.</i>		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Milwaukee-Waukesha-West Allis, WI MSA	Full-scope	Full counties of Washington County, western Ozaukee County, and northern Waukesha County.
Non-MSA	Full-scope	Northern portion of Dodge County.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: The First National Bank of Hartford	
Overall Bank:	Lending Test Rating:
Satisfactory	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2016</b>		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Milwaukee MSA	141	26,286	91.0	0.0	0.0	0.0	1.5	2.1	1.5	48.7	67.4	46.9	49.8	30.5	51.5	0.0	0.0	0.0	
Non-MSA	14	2,084	9.0	0.0	0.0	0.0	0.0	0.0	0.0	22.3	7.1	20.0	77.7	92.9	80.0	0.0	0.0	0.0	
<b>Total</b>	<b>155</b>	<b>28,370</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>1.4</b>	<b>1.9</b>	<b>1.5</b>	<b>46.7</b>	<b>61.9</b>	<b>45.6</b>	<b>52.0</b>	<b>36.1</b>	<b>53.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2017-2018</b>		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Milwaukee MSA	163	34,542	90.6	0.0	0.0	0.0	0.0	0.0	0.0	48.3	76.7	49.2	51.7	23.3	50.8	0.0	0.0	0.0	
Non-MSA	17	3,010	9.4	0.0	0.0	0.0	0.0	0.0	0.0	72.1	58.8	67.4	27.9	41.2	32.6	0.0	0.0	0.0	
<b>Total</b>	<b>180</b>	<b>37,552</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>50.1</b>	<b>75.0</b>	<b>50.3</b>	<b>49.9</b>	<b>25.0</b>	<b>49.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2016</b>		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	
Milwaukee MSA	141	26,286	91.0	11.8	5.7	3.6	15.5	12.1	12.5	22.1	26.2	22.0	50.6	51.1	51.2	0.0	5.0	10.7	
Non-MSA	14	2,084	9.0	12.6	0.0	2.8	15.6	14.3	16.0	21.8	35.7	21.5	50.0	35.7	46.1	0.0	14.3	13.5	
<b>Total</b>	<b>155</b>	<b>28,370</b>	<b>100.0</b>	<b>11.9</b>	<b>5.2</b>	<b>3.6</b>	<b>15.5</b>	<b>12.3</b>	<b>12.7</b>	<b>22.0</b>	<b>27.1</b>	<b>22.0</b>	<b>50.6</b>	<b>49.7</b>	<b>50.9</b>	<b>0.0</b>	<b>5.8</b>	<b>10.8</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2017-2018</b>		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	% of House-holds	% Bank Loans	Aggregate	
Milwaukee MSA	163	34,542	90.6	11.8	7.4	4.1	14.8	21.5	13.5	21.5	27.0	23.3	51.9	35.6	46.8	0.0	8.6	12.3	
Non-MSA	17	3,010	22.1	14.2	5.9	4.5	14.4	17.6	17.1	27.0	29.4	23.2	44.4	35.3	39.8	0.0	11.8	15.5	
<b>Total</b>	<b>180</b>	<b>37,552</b>	<b>100.0</b>	<b>12.0</b>	<b>7.2</b>	<b>4.1</b>	<b>14.7</b>	<b>21.1</b>	<b>13.7</b>	<b>21.9</b>	<b>27.2</b>	<b>23.3</b>	<b>51.4</b>	<b>35.6</b>	<b>46.4</b>	<b>0.0</b>	<b>8.9</b>	<b>12.5</b>	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Milwaukee MSA	22	5,649	66.7	5,529	0.0	0.0	0.0	2.1	0.0	1.2	56.5	63.6	43.4	41.5	36.4	55.4	0.0	0.0	0.0
Non-MSA	11	1,597	33.3	275	0.0	0.0	0.0	0.0	0.0	0.0	18.0	54.6	14.5	82.0	45.4	85.5	0.0	0.0	0.0
<b>Total</b>	<b>33</b>	<b>7,246</b>	<b>100.0</b>	<b>5,804</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>1.9</b>	<b>--</b>	<b>1.2</b>	<b>54.0</b>	<b>--</b>	<b>42.0</b>	<b>44.1</b>	<b>--</b>	<b>56.8</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Milwaukee MSA	25	2,324	69.5	4,207	0.0	0.0	0.0	0.0	0.0	0.0	56.4	84.0	46.9	43.6	16.0	53.1	0.0	0.0	0.0
Non-MSA	11	1,616	30.5	216	0.0	0.0	0.0	0.0	0.0	0.0	71.8	72.7	68.5	28.2	27.3	31.5	0.0	0.0	0.0
<b>Total</b>	<b>36</b>	<b>3,940</b>	<b>100.0</b>	<b>4,423</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>57.5</b>	<b>--</b>	<b>47.9</b>	<b>42.5</b>	<b>--</b>	<b>52.1</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2016</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Milwaukee MSA	22	5,649	66.7	5,529	77.8	68.2	41.4	11.1	31.8	11.1	0.0	
Non-MSA	11	1,597	33.3	275	80.1	72.7	45.1	7.8	27.3	12.1	0.0	
<b>Total</b>	<b>33</b>	<b>7,246</b>	<b>100.0</b>	<b>5,804</b>	<b>77.9</b>	<b>--</b>	<b>41.5</b>	<b>10.9</b>	<b>--</b>	<b>11.2</b>	<b>--</b>	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0.*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017-2018</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Milwaukee MSA	25	2,324	69.5	4,207	77.9	76.0	50.4	11.1	24.0	11.0	0.0	
Non-MSA	11	1,616	30.5	216	80.0	45.5	52.8	6.8	54.5	13.2	0.0	
<b>Total</b>	<b>36</b>	<b>3,940</b>	<b>100.0</b>	<b>4,423</b>	<b>78.4</b>	<b>--</b>	<b>50.5</b>	<b>10.5</b>	<b>--</b>	<b>11.2</b>	<b>--</b>	

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