



## **PUBLIC DISCLOSURE**

May 20, 2019

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

American National Bank - Fox Cities  
Charter Number 22553

2200 N. Richmond Street  
Appleton, WI 54911-1948

Office of the Comptroller of the Currency

Milwaukee Field Office  
High Pointe on Mayfair  
1200 North Mayfair Road, Suite 200  
Wauwatosa, WI 53226-3282

**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:

- A majority of the bank's loans are made inside the assessment area (AA).
- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its AA.
- The bank's distribution of loans to individuals of different income levels and businesses of different sizes is reasonable given the product lines offered by the bank.

### Loan-to-Deposit Ratio

American National Bank-Fox Cities' (ANB Fox Cities) lending level is reasonable given the institution's size, financial condition, area competition, and credit needs of the community. ANB Fox Cities' LTD ratio averaged 86.45 percent over the last 13 quarters, with a quarterly low of 81.93 percent and a quarterly high of 93.00 percent. ANB Fox Cities' LTD ratio ranked fifth of six similarly situated banks. The five other similarly situated banks with assets between \$95.7 million and \$284.6 million had quarterly average LTD ratios ranging from 84.65 percent to 95.68 percent during the same time period.

### Lending in Assessment Area

ANB Fox Cities originates a majority of its loans inside the AA. We reviewed the bank's 2016-2018 Home Mortgage Disclosure Act Loan Activity Register (HMDA LAR) and sampled 40 business loans originated between January 1, 2016 and December 31, 2018 for our analysis. The bank originated and purchased 64.3 percent of its total loans by number and 62.4 percent of its loans by dollar amount inside the bank's AAs during the evaluation period. Refer to the table below for further details.

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	94	60.3%	62	39.7%	156	17,897	62.1%	10,902	37.9%	28,799
Commercial	32	80.0%	8	20.0%	40	4,055	63.5%	2,330	36.5%	6,385
Total	126	64.3%	70	35.7%	196	21,952	62.4%	13,232	37.6%	35,184

Source: Home Mortgage Disclosure Act Loan Activity Register 2016, 2017, 2018. Sample of Bank's small business loans.

### Description of Institution

ANB Fox Cities is a single-state national bank headquartered in Appleton, Wisconsin with total assets of \$290.6 million as of December 31, 2018. ANB Fox Cities is wholly owned by American National Bancorp, a one-bank holding company also located in Appleton, Wisconsin. ANB Fox Cities has one

branch, its headquarters, and one 24-hour non-deposit taking ATM, which is on the same premises. The branch is located in the bank's AA, which is the entirety of the Appleton Wisconsin 11540 metropolitan statistical area (MSA). No branches were opened or closed since the last CRA evaluation. In May 2017, the bank opened a loan production office (LPO) in Green Bay, Wisconsin. No deposits or loan applications are taken at the LPO. There have been no mergers or acquisitions since the last CRA evaluation.

For customer convenience, ANB Fox Cities offers both consumer and business customers online banking and mobile banking services.

Competition is strong due to many large, regional, and community financial institutions in the area. As of the June 30, 2018 FDIC Deposit Market Share Report, ANB Fox Cities ranks 4th out of 29 financial institutions in terms of total deposits (\$242.7 million) held within the AA at 6.0 percent of total deposits.

ANB Fox Cities offers a full range of loan and deposit products and services to its customers. The bank's primary products are commercial and residential real estate loans. As of December 31, 2018, the loan portfolio totaled \$212.7 million representing 73.21 percent of total assets, and was comprised of commercial loans (91.57 percent), residential real estate loans (7.53 percent), agricultural loans (0.60 percent), and consumer loans (0.30 percent).

ANB Fox Cities' strategic focus is to serve the Fox Cities as an independent community bank with a focus on small business loans. In recognition of ANB Fox Cities' small business lending, the bank received the Wisconsin SBA Volume Lender Award for the most loans approved in the \$200 to \$300 million bank asset size category in 2017.

The previous CRA Performance Evaluation (PE), dated July 5, 2016, resulted in a Satisfactory rating using the Small Bank performance standards. There are no legal or financial impediments to ANB Fox Cities' ability to meet the credit needs of its AA.

## **Scope of the Evaluation**

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

The evaluation period is from the date of the previous CRA PE, July 5, 2016, through December 31, 2018. We assessed the bank under the Small Bank criterion, which includes a Lending Test. The Lending Test evaluated the lending activity for calendar year 2016 compared to the 2010 U.S. Census data. The lending data for calendar years 2017 and 2018 was compared to the 2015 American Community Survey (ACS) Census data.

The primary loan products for the AA were determined to be commercial and residential loans, based on the number and dollar amount of the bank's loans originated and purchased between January 1, 2016 and December 31, 2018, per bank data. Commercial loan originations totaled 85 percent by dollar amount and 63 percent by number during the evaluation period. Residential real estate loans originated totaled 13 percent by dollar amount and 22 percent by number during the evaluation period.

## **Data Integrity**

To evaluate ANB Fox Cities' lending performance, we conducted a data integrity review of the 2016, 2017, and 2018 HMDA LARs. We found the data in the HMDA LARs to be reliable for use in this evaluation.

To determine ANB Fox Cities' commercial lending, we reviewed a random sample of commercial loans. We obtained the gross revenues of commercial borrowers and geocoded each loan sampled.

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

ANB Fox Cities operates in one AA, which consists of the counties of Calumet and Outagamie, which are the entire Appleton Wisconsin 11540 MSA, and we completed a full-scope review of that AA.

## **Ratings**

The bank's overall rating is based entirely on its performance in this single AA. Refer to appendix B-1 for additional information on the bank's AA.

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

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

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

## **Description of Institution's Operations in the Appleton Wisconsin 11540 MSA**

ANB Fox Cities has one AA: all of the Appleton Wisconsin 11540 MSA. The MSA is made up of the entirety of Calumet and Outagamie Counties located in east central Wisconsin. Based on the 2010 Census data and 2015 ACS Census data, the MSA contained no low-income census tracts (CTs) and only four moderate-income CTs in the 2010 Census data, which increased to seven moderate-income CTs in the 2015 ACS Census data. The bank's AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

Competition within the bank's AA is strong and includes several community banks and credit unions, as well as numerous branches of regional and national banks. ANB Fox Cities' ranked 42nd of 272 lenders in its AA in home mortgage lending market share in 2016, and 49th of 265 lenders in its AA in home mortgage lending market share in 2017. Large local credit unions were the top two lenders in both 2016 and 2017 according to the FFIEC peer mortgage data market share reports.

Calumet County’s unemployment rates continue to improve, declining from 3.6 percent in January 2016 to 2.3 percent in December 2018. Outagamie County’s unemployment improved from 4.0 percent in January 2016 to 2.7 percent in December 2018. Unemployment in both counties remains below Wisconsin’s statewide December 2018 unemployment rate of 2.8 percent.

As part of this PE, two community contacts were conducted. A representative from a regional planning commission organization in east central Wisconsin and a representative from an economic development organization in Appleton, Wisconsin were interviewed. The contacts noted current economic conditions in the area are good. New businesses are expanding into the area, and existing businesses are growing. Commercial real estate in the area has a very low percentage of vacancy. The economic growth created a lack of labor force to fill the needs of multiple skill levels in the area. The contacts echoed a need for affordable housing in the area. The shortage of housing hampers people being drawn to the area to work. Lower wage jobs would not support the more expensive houses on the market, and many older homes in the area need rehabilitation.

Both contacts had positive perceptions of the financial institutions in the area. They noted that area banks are working with businesses in financing projects and that the banks are actively engaged in community support and development.

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

**Assessment Area: American National Bank Fox Cities Appleton WI MSA AA - 2016**

Demographic Characteristics	#	Low % of	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	51	0.0	7.8	76.5	15.7	0.0
Population by Geography	225,666	0.0	7.0	75.0	18.0	0.0
Housing Units by Geography	91,732	0.0	8.3	76.8	14.9	0.0
Owner-Occupied Units by Geography	65,496	0.0	6.2	75.8	18.0	0.0
Occupied Rental Units by Geography	21,831	0.0	13.0	80.4	6.6	0.0
Vacant Units by Geography	4,405	0.0	16.0	73.7	10.3	0.0
Businesses by Geography	10,669	0.0	11.5	76.5	12.0	0.0
Farms by Geography	728	0.0	4.9	78.4	16.6	0.0
Family Distribution by Income Level	60,294	16.5	19.2	26.2	38.1	0.0
Household Distribution by Income Level	87,327	21.2	16.9	21.4	40.5	0.0
Median Family Income MSA – 11540 Appleton WI MSA		\$69,972	Median Housing Value			\$157,275
			Median Gross Rent			\$650
			Families Below Poverty Level			5.3%

Source: 2010 U.S. Census and 20XX 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.

**Table A – Demographic Information of the Assessment Area****Assessment Area: American National Bank Fox Cities Appleton WI MSA AA - 2017**

Demographic Characteristics	#	Low % of	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	51	0.0	13.7	76.5	9.8	0.0
Population by Geography	230,108	0.0	11.1	80.3	8.6	0.0
Housing Units by Geography	94,481	0.0	11.7	80.9	7.4	0.0
Owner-Occupied Units by Geography	65,293	0.0	9.2	81.4	9.4	0.0
Occupied Rental Units by Geography	23,795	0.0	18.7	78.1	3.2	0.0
Vacant Units by Geography	5,393	0.0	10.9	87.2	1.9	0.0
Businesses by Geography	11,251	0.0	10.6	82.1	7.3	0.0
Farms by Geography	692	0.0	7.5	85.7	6.8	0.0
Family Distribution by Income Level	61,531	18.2	18.6	24.9	38.3	0.0
Household Distribution by Income Level	89,088	21.7	17.2	20.9	40.2	0.0
Median Family Income MSA – 11540 Appleton WI MSA		\$73,709	Median Housing Value			\$160,416
			Median Gross Rent			\$715
			Families Below Poverty Level			6.0%

Source: 2015 ACS Census and 2018 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.

## LENDING TEST

The bank's performance under the Lending Test in its AA is Satisfactory.

Based on a full-scope review, the bank's performance in its AA, the Appleton Wisconsin 11540 MSA, is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the AA.

Performance context includes changes in CT income designations in 2016 versus 2017/2018. In 2016, the Appleton Wisconsin 11540 MSA included four moderate-income CTs, and in 2017/2018, the MSA moderate-income CTs increased to seven. The AA contains no low-income CTs.

### Home Mortgage Loans

The bank's distribution of home mortgage loans to households of low- and moderate-income levels is reasonable.

Refer to tables O (a) and (b) in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

ANB Fox Cities' distribution of small business loans to businesses among CTs of various income levels is reasonable. The AA consisted of no low-income CTs and only four moderate-income CTs. The bank's small business lending in moderate-income CTs in 2016 was significantly lower than the percentage of businesses in the moderate income CTs. The largest moderate-income CT was located miles from the ANB Fox Cities branch. The 2017/2018 small business lending in the AA meets the number of small businesses in the moderate-income CTs.

Refer to tables Q (a) and (b) 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.

### ***Lending Gap Analysis***

We did not identify any unexplained exclusion from lending or unexplained lending gaps in moderate-income CTs in the banks AA.

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

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

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

ANB Fox Cities' distribution of loans to low income borrowers is lower than the percentage of low income borrowers in the MSA. Community contacts noted a lack of affordable housing for low income borrowers in the MSA. The bank's distribution of loans to moderate-income borrowers in 2016 was slightly lower than the percentage of moderate-income families, but exceeded the percentage of moderate-income families in 2017/2018.

Refer to tables P (a) and (b) in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

ANB Fox Cities' distribution of loans to businesses with gross revenues less than a million dollars in 2016 and 2017/2018 exceeds aggregate peer data for the AA.

In 2017, ANB Fox Cities was recognized as the Wisconsin SBA Volume Lender for the most loans approved in the \$200-\$300 million bank asset size category.

Refer to table R (a) and (b) 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.



## **Responses to Complaints**

There have been no consumer complaints related to ANB Fox Cities' CRA performance received by the bank during this evaluation period. The Office of the Comptroller of the Currency (OCC) did not receive any CRA-related complaints regarding ANB Fox Cities during the evaluation period.

## 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>	1/1/2016 – 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage and small business	
<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>
MMSA(s)		
Appleton Wisconsin 11540 MSA	Full-scope	Counties of Calumet and Outagamie

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: ANB Fox Cities	
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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table 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/assessment area. 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 assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 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 assessment area.

- 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/assessment area.

<b>Table O (a): 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
ANB Fox Cities	45	8,144	100.0	0.0	0.0	0.0	6.2	0.0	5.1	75.8	73.3	72.0	18.0	26.7	22.9	0.0	0.0	0.0
<b>Total</b>	45	8,144	100.0	0.0	0.0	0.0	6.2	0.0	5.1	75.8	73.3	72.0	18.0	26.7	22.9	0.0	0.0	0.0

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

<b>Table O (b): 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
ANB Fox Cities	49	9,753	100.0	0.0	0.0	0.0	9.2	10.2	8.6	81.4	63.3	81.4	9.4	26.5	10.0	0.0	0.0	0.0
<b>Total</b>	49	9,753	100.0	0.0	0.0	0.0	9.2	10.2	8.6	81.4	63.3	81.4	9.4	26.5	10.0	0.0	0.0	0.0

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

<b>Table P (a): Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2016</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
ANB Fox Cities	45	8,144	100.0	16.5	2.2	7.7	19.2	17.8	21.4	26.2	17.8	24.8	38.1	44.4	33.2	0.0	17.8	13.0	
<b>Total</b>	45	8,144	100.0	16.5	2.2	7.7	19.2	17.8	21.4	26.2	17.8	24.8	38.1	44.4	33.2	0.0	17.8	13.0	

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

<b>Table P (b): Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2017/2018</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
ANB Fox Cities	49	9,753	100.0	18.2	8.2	9.3	18.6	22.4	21.5	24.9	12.2	24.9	38.3	38.8	33.0	0.0	18.4	11.3	
<b>Total</b>	49	9,753	100.0	18.2	8.2	9.3	18.6	22.4	21.5	24.9	12.2	24.9	38.3	38.8	33.0	0.0	18.4	11.3	

*Source: 20XX U.S 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 Q (a): Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>												<b>2016</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available- Income Tracts</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
ANB Fox Cities	20	4,521	100.0	0.0	0.0	11.5	5.0	76.5	90.0	12.0	5.0	0.0	0.0
<b>Total</b>	20	4,521	100.0	0.0	0.0	11.5	5.0	76.5	90.0	12.0	5.0	0.0	0.0

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

<b>Table Q (b): Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>												<b>2017/2018</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available- Income Tracts</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
ANB Fox Cities	20	3,013	100.0	0.0	0.0	10.6	10.0	82.1	90.0	7.3	0.0	0.0	0.0
<b>Total</b>	20	3,013	100.00	0.0	0.0	10.6	10.0	82.1	90.0	7.3	0.0	0.0	0.0

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

<b>Table R (a): 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	
ANB Fox Cities	20	4,521	100.0	3,084	75.2	65.0	42.4	8.7	35.0	16.0	--	
<b>Total</b>	20	4,521	100.0	3,084	75.2	65.0	42.4	8.7	35.0	16.0	--	
<i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>												

<b>Table R (b): 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	
ANB Fox Cities	20	3,013	100.0	2,870	75.3	50.0	49.3	8.9	50.0	15.7	--	
<b>Total</b>	20	3,013	100.0	2,870	75.3	50.0	49.3	8.9	50.0	15.7	--	
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>												