



PUBLIC DISCLOSURE

April 1, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North Shore Bank, FSB
Charter Number: 702130

15700 West Bluemound Road
Brookfield, WI 53005-6024

Office of the Comptroller of the Currency
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.

Table of Contents

Overall CRA Rating.....3
Description of Institution..... 4
Scope of the Evaluation.....5
Discriminatory or Other Illegal Credit Practices Review.....6
State Rating.....7
 State of Wisconsin7
State Rating.....21
 State of Illinois21
Appendix A: Scope of Examination.....A-1
Appendix B: Summary of State Ratings.....B-1
Appendix C: Definitions and Common Abbreviations.....C-1
Appendix D: Tables of Performance Data.....D-1

Overall CRA Rating

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

The following table indicates the performance level of North Shore Bank, FSB (North Shore) with respect to the Lending, Investment, and Service Tests:

Performance Levels	North Shore Bank, 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:

- The Lending Test rating is based on a blend of state ratings and assessment area (AA) reviews. North Shore’s lending levels reflect excellent responsiveness to the credit needs in its AAs, taking into account the number and amount of home mortgage and small business loans in its AAs. A high percentage of North Shore’s loans are made in its AAs. The institution exhibits an adequate geographic distribution and good borrow distribution. The institution has made a relatively high level of community development (CD) loans.
- The Investment Test rating is based on a blend of state ratings and AA reviews. North Shore has an adequate level of qualified investments, occasionally in a leadership position. North Shore exhibits good responsiveness to credit and CD needs. The institution makes occasional use of innovative or complex qualified investments.
- The Service Test rating is based on a blend of state ratings and AA reviews. North Shore’s service delivery systems are accessible to geographies and individuals of different income levels in its AAs. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and LMI individuals. The institution provides an adequate level of CD services.

Lending in Assessment Area

A high percentage of the bank's loans are in its AAs.

The bank originated and purchased 87.0 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than at the AA level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	721	84.3	134	15.7	855	209,338	66.8	103,902	33.2	313,240
2017	455	86.0	74	14.0	529	118,772	67.5	57,182	32.5	175,954
2018	934	86.7	143	13.3	1,077	158,860	50.1	158,077	49.9	316,938
Subtotal	2,110	85.7	351	14.3	2,461	486,970	60.4	319,161	39.6	806,132
Small Business										
2016	121	93.1	9	6.9	130	20,965	89.7	2,418	10.3	23,383
2017	164	94.3	10	5.7	174	31,012	93.3	2,215	6.7	33,227
2018	165	92.7	13	7.3	178	26,922	84.9	4,781	15.1	31,703
Subtotal	450	93.4	32	6.6	482	78,899	89.3	9,414	10.7	88,313
Total	2,560	87.0	383	13.0	2,943	565,869	63.3	328,575	36.7	894,445
<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

North Shore is a federally chartered mutual thrift headquartered in Brookfield, Wisconsin. North Shore is an interstate institution with branch locations in Wisconsin and Illinois. The bank has two rating areas and eight AAs. North Shore has 44 full-service banking offices and 40 deposit-taking automated teller machines across its footprint. As of December 31, 2018, North Shore had total assets of \$2.03 billion, total loans of \$1.61 billion, and tier 1 capital of \$229 million.

North Shore offers a full range of loan and deposit products to individuals and businesses, including alternative retail services such as direct deposit and access to electronic banking services (bill payment, mobile banking, and electronic statements). North Shore offers a standard product mix of loans, including Wisconsin Housing and Economic Development Authority (WHEDA) and the US Department of Veterans Affairs (VA).

The bank originates conventional one-to four-family first mortgage loans, small business loans and lines of credit, working capital and equipment loans, and business letters of credit. Consumer financing consists of second mortgages, home equity lines of credit, and automobile (including leases) loans. As of December 31, 2018, the bank's loans represented 79.33 percent of total assets, and the loan portfolio

consisted of 28.87 percent residential real estate loans, 46.62 percent commercial loans, 24.48 percent consumer loans, and 0.03 percent agricultural loans.

During the evaluation period, North Shore acquired Layton State Bank. As a part of this October 2016 acquisition, North Shore acquired four branches located in the Milwaukee-Waukesha-West Allis, Wisconsin metropolitan statistical area (MSA).

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank achieved a Satisfactory rating in its previous Large Bank CRA performance evaluation, dated January 26, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

North Shore was evaluated using the Large Bank procedures to assess the bank's record of meeting the credit needs of the communities it serves. The Large Bank procedures include a Lending Test, Investment Test, and Service Test. The evaluation covered the period of time since the previous CRA examination, January 26, 2015, through April 1, 2019. The evaluation period for CD loans, the Investment Test, and the Service Test was January 1, 2015 through December 31, 2018.

We analyzed home mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses and farms the bank reported under the CRA during the period of January 1, 2016 through December 31, 2018. The bank's performance related to small farm loans was not analyzed or discussed due to lack of originations. Performance tables in appendix D include only the data covered from 2017 through 2018. Data from 2016 is discussed in the applicable narrative sections of this evaluation.

Under the Lending Test, we performed separate analyses of 2016 data and 2017 through 2018 data. This is due to changes instituted by the American Community Survey (ACS), which resulted in updated population and housing information in the 2017 data. The updated ACS data also resulted in changes to the income designations of some census tracts (CTs). The 2017 through 2018 analysis period will receive more weight than the 2016 analysis period as this period represents a larger portion of the bank's lending activity during the evaluation period. North Shore did not change its lending strategy during the two analysis periods.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate MSA, or combined statistical area 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 section of this evaluation 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.

Ratings

The bank's overall rating is a blend of the state ratings and, where applicable, multistate ratings. The ratings for the state of Wisconsin carried the greatest weight in our overall conclusions. These areas represented the bank's most significant markets in terms of lending, deposits, and branch distribution. These areas are the Milwaukee-Waukesha-West Allis, Wisconsin MSA and the Lake County-Kenosha County, IL-WI, Metropolitan Division (MD) (Kenosha County only). We also selected the Chicago-Naperville-Arlington Heights, IL MD (McHenry County only) in the State of Illinois.

The state ratings are based on performance in all bank AAs. Refer to the Scope of Evaluation section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: High Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans and an adequate level of lending for small loans to businesses.
- An adequate geographic distribution of loans in its AAs. This is evidenced by adequate home mortgage performance and good small loans to business performance.
- A good distribution of loans, particularly in its AAs, among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank. This is evidenced by good home mortgage and excellent small loans to small business loan performance.
- Overall positive CD lending in the state, with positive performance in the Milwaukee MSA, and neutral performance in Kenosha County AA.
- A significant level of qualified investments that were responsive to community needs, as evidenced by good performance in the AAs.
- Delivery systems that are accessible to geographies and individuals of different income levels, and a record of opening and closing branches that has not adversely affected the accessibility of its delivery systems.
- An adequate level of CD services that were responsive to community needs.

Description of the Institution's Operations in Wisconsin

North Shore has seven AAs within the State of Wisconsin. These AAs include the Appleton MSA, comprised of Calumet and Outagamie Counties; the Green Bay MSA, comprised of Brown County; the Lake County-Kenosha County, IL-WI MD, comprised of Kenosha County; the Milwaukee-Waukesha-West Allis MSA, comprised of Milwaukee, Ozaukee, Washington, and Waukesha Counties; the Wisconsin non-MSA area, which includes Door County; the Oshkosh-Neenah MSA, comprised of Winnebago County; and the Racine MSA, comprised of Racine County.

North Shore provides a full range of loan and deposit products to all AAs. North Shore has 42 branches within the state, representing 95.45 percent of the bank's total branch network. This total includes four branches acquired through the acquisition of Layton State Bank in October 2016. There were no branch openings and six branch closings in the state during the evaluation period. Five branches throughout the AAs relocated to different locations less than one mile away. As of June 30, 2018, the bank ranked 12th

in the state in deposits, representing a 1.10 percent market share. North Shore's statewide deposits totaled \$1.64 billion.

Milwaukee-Waukesha-West Allis MSA

Strong competition for financial services exists within this AA, as there are several branches of nationwide and regional banks, local community banks, credit unions, and other nonbanking financial institutions operating in the AA. North Shore has 24 branches operating in the AA as of April 1, 2019.

Kenosha County AA

Strong competition for financial services exists within this AA, as there are several branches of nationwide and regional banks, local community banks, and mortgage companies operating in the AA. North Shore has three branches operating in the AA as of April 1, 2019.

Milwaukee-Waukesha-West Allis MSA

Table A –Demographic Information of the Assessment Area						
Assessment Area: North Shore Milwaukee MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	431	23.0	15.8	32.3	28.3	0.7
Population by Geography	1,570,006	16.7	14.9	33.7	34.7	0.0
Housing Units by Geography	671,468	16.1	15.1	35.4	33.4	0.0
Owner-Occupied Units by Geography	376,569	7.3	11.9	36.2	44.5	0.0
Occupied Rental Units by Geography	247,577	25.6	20.0	36.1	18.3	0.0
Vacant Units by Geography	47,322	35.9	15.3	25.0	23.9	0.0
Businesses by Geography	82,426	10.9	11.8	35.4	41.7	0.0
Farms by Geography	1,873	5.6	6.8	38.7	49.0	0.0
Family Distribution by Income Level	388,209	23.5	16.2	19.4	40.9	0.0
Household Distribution by Income Level	624,146	25.2	15.4	17.0	42.4	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha-West Allis, WI MSA		\$75,386	Median Housing Value			\$186,990
			Median Gross Rent			\$841
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

The Milwaukee-Waukesha-West Allis MSA is comprised of the entire MSA, consisting of Milwaukee, Ozaukee, Washington, and Waukesha Counties.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 431 CTs, of which 99 (22.97 percent) are low-income, 68 (15.78 percent) are moderate-income, 139 (32.25 percent) are middle-income, 122 (28.31 percent) are upper-income, and three (0.70 percent) are designated as NA. The total population of the AA is 1,570,006, which is comprised of 388,209 families. The number of families at each income level is: 91,084 low-income families (23.46 percent), 62,807 moderate-income families (16.18 percent), 75,402 middle-income families (19.42 percent), and 158,916 upper-income families (40.94 percent). The average median family income is \$75,386, and the FFIEC 2017 updated MSA median family income is \$72,400. The percentage of families below the poverty level is 11.15 percent. Owner-occupied units comprise 56.08 percent of total housing units. Based on 2017

demographic data, the total number of businesses with reported revenues in this AA was 80,452. Of these businesses, 63,208 (78.57 percent) had gross revenues of \$1 million or less, 7,686 (9.55 percent) had gross revenues over \$1 million, and 9,558 (11.88 percent) did not report revenue.

Employment and Economic Factors

According to the Bureau of Labor Statistics (<http://beta.bls.gov>), unemployment in the Milwaukee MSA improved during the evaluation period. The unemployment rate in Milwaukee County fell from 5.7 percent in December 2014 to 3.0 percent in December 2018. The unemployment rate in Ozaukee County fell from 3.4 percent in December 2014 to 2.1 percent in December 2018. The unemployment rate for Washington County fell from 3.6 percent in December 2014 to 2.2 percent in December 2018. The unemployment rate for Waukesha County fell from 3.6 percent in December 2014 to 2.3 percent in December 2018. Unemployment in the state of Wisconsin fell from 4.6 percent in December 2014 to 2.8 percent in December 2018.

Major employers include Aurora Health Care Inc., Ascension Wisconsin, Froedtert Health, Kohl’s, and Quad Graphics Inc.

According to Moody's Analytics, job growth has returned after a one-year lull, and residential real estate has picked up. Single family housing starts are climbing, but supply is not keeping up with demand. Existing home sales are the highest since 2006.

Several community contacts performed for the MSA identified affordable housing, home improvement lending, and alternate credit programs as generally important needs in the community. There is also a need for combined purchase-rehab loans for homes in LMI areas, as much of the housing stock in Milwaukee is old and aging poorly.

Kenosha County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: North Shore Kenosha County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	16.7	38.9	41.7	0.0	2.8
Population by Geography	167,738	13.0	38.2	48.8	0.0	0.0
Housing Units by Geography	69,510	11.9	39.5	48.6	0.0	0.0
Owner-Occupied Units by Geography	41,580	8.0	36.5	55.5	0.0	0.0
Occupied Rental Units by Geography	20,750	19.8	47.3	32.9	0.0	0.0
Vacant Units by Geography	7,180	11.5	34.2	54.3	0.0	0.0
Businesses by Geography	7,275	8.8	36.5	54.7	0.0	0.0
Farms by Geography	287	6.3	16.4	77.4	0.0	0.0
Family Distribution by Income Level	41,587	29.6	21.6	22.3	26.4	0.0
Household Distribution by Income Level	62,330	33.0	19.0	18.8	29.1	0.0
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI MD		\$91,600	Median Housing Value			\$165,984
			Median Gross Rent			\$852
			Families Below Poverty Level			11.0%
<i>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.</i>						

The bank's designated Lake County-Kenosha County, IL-WI MD AA consist of Kenosha County in the state of Wisconsin.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 36 CTs, of which six (16.67 percent) are low-income, 14 (38.89 percent) are moderate-income, 15 (41.67 percent) are middle-income, zero are upper-income, and one (2.78 percent) is designated as NA. The total population of the AA is 167,738, which is comprised of 41,587 families. The number of families at each income level is: 12,324 low-income families (29.63 percent), 8,982 moderate-income families (21.60 percent), 9,289 middle-income families (22.34 percent), and 10,992 upper-income families (26.43 percent). The average median family income is \$69,803, and the FFIEC 2017 updated MSA median family income is \$91,600. The percentage of families below the poverty level is 11.00 percent. Owner-occupied units comprise 59.82 percent of total housing units. Based on 2017 demographic data, the total number of businesses with reported revenues in this AA was 7,222. Of these businesses, 5,890 (81.56 percent) had gross revenues of \$1 million or less, 462 (6.40 percent) had gross revenues over \$1 million, and 870 (12.05 percent) did not report revenue.

Employment and Economic Factors

According to the Bureau of Labor Statistics (<http://beta.bls.gov>), unemployment in the Kenosha County AA improved during the evaluation period. The unemployment rate in Kenosha County fell from 5.1 percent in December 2014 to 3.0 percent in December 2018. Unemployment in the state of Wisconsin fell from 4.6 percent in December 2014 to 2.8 percent in December 2018.

The largest industries in Kenosha County, Wisconsin are manufacturing, healthcare & social assistance, and retail trade. Major employers in the area include Snap-on Incorporated, Jockey International, Abbott Laboratories, United Hospital System, and Aurora Health Care.

Scope of Evaluation in Wisconsin

For the state of Wisconsin, we completed a full-scope review of the Milwaukee-Waukesha-West Allis MSA and Lake County-Kenosha County, IL-WI MD. The five additional AAs received limited-scope reviews. The Milwaukee MSA received full-scope review due to the high percentage of deposits in the area, 67.66 percent. The Kenosha AA was not reviewed at the previous evaluation and has 3.94 percent of the deposits in the area. The Milwaukee MSA also had the largest volume of total reportable loans in the state, 62.83 percent, while the Kenosha AA had 6.06 percent. Branch distribution within the state shows the Milwaukee MSA with 57.14 percent of the total branches and the Kenosha AA with 7.14 percent. The Milwaukee MSA AA received the most weight on final ratings because this AA had the largest percent of the bank's deposits, loans, and branches in Wisconsin. The volume of small farm loans was not significant enough to provide a meaningful analysis in the Wisconsin AAs. Refer to the tables in appendix A for more information on the Wisconsin AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee MSA is good. The bank's performance in the Kenosha County AA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. There is strong competition of all types of loans in the bank's AAs. The institution's excellent performance in originating home mortgage loans and adequate performance in small business loans when compared to its local competitors supports this conclusion.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Milwaukee MSA	1,277	310	0	17	1,587	62.83	69.26
Kenosha AA	97	56	0	1	153	6.06	3.94
Appleton MSA	50	11	0	7	61	2.41	2.56
Green Bay MSA	200	11	0	8	211	8.35	8.72
Non-MSA	223	20	0	0	243	9.62	4.82
Oshkosh-Neenah MSA	8	5	0	5	13	0.51	1.39
Racine MSA	240	18	0	2	258	10.22	9.31

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Milwaukee MSA	305,313	58,942	0	30,278	364,255	65.01	69.26
Kenosha AA	15,924	10,082	0	200	26,006	4.64	3.94
Appleton MSA	13,682	1,164	0	9,045	14,846	2.65	2.56
Green Bay MSA	51,881	667	0	13,458	52,548	9.38	8.72
Non-MSA	47,833	2,777	0	0	50,610	9.03	4.82
Oshkosh-Neenah MSA	3,469	353	0	8,273	3,822	0.68	1.39
Racine MSA	46,500	1,744	0	2,307	48,244	8.61	9.31

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Milwaukee-Waukesha-West Allis MSA

North Shore's lending activity in the Milwaukee MSA is excellent. Home mortgage lending is excellent, and small business lending activity is adequate considering competition in the AA.

Based upon FDIC Deposit Market Share data for the Milwaukee MSA, as of June 30, 2018, North Shore had total deposits of \$1.1 billion. This resulted in a 1.83 percent market share of deposits, which ranked 8th among 47 financial institutions in the AA. Based upon 2017 peer mortgage data, North Shore achieved a 0.61 percent market share of home mortgage loans, ranking 38th among 482 reporting lenders. This level of mortgage lending activity is excellent considering the bank's rankings for home mortgage products within this highly competitive market.

North Shore achieved a 0.43 percent market share of small loans to businesses, ranking 28th among 116 reporting lenders. The small business lending activity is adequate given the bank's ranking compared to the small business lending competition within the AA. The top five lenders for small business lending consist of the nation's largest credit card lenders, which have a 61.82 percent market share collectively.

Kenosha County AA

North Shore's lending activity in the Kenosha County AA is adequate. Based upon FDIC Deposit Market Share data for the Kenosha County AA, as of June 30, 2018, North Shore had total deposits of \$64.8 million. This resulted in a 2.52 percent market share of deposits, which ranked 9th among 11 financial institutions in the AA. Based upon 2017 peer mortgage data, the bank did not originate a sufficient volume of loans to conduct a meaningful analysis. The bank originated just 14 home mortgage loans and 16 small loans to businesses in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to table O in the State of Wisconsin section of 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

North Shore's geographic distribution of home mortgage loans in 2017 and 2018 is good. The percentage of bank loans originated in low-income geographies is below the percentage of owner-occupied housing units, but exceeds aggregate peer lending in these geographies. The percentage of loans originated in moderate-income geographies is near to the percentage of owner-occupied housing units and aggregate peer lending in these geographies.

North Shore's geographic distribution of home mortgage loans in 2016 is poor. The percentage of loans in low-income geographies is below the percentage of owner-occupied housing units and aggregate peer lending in these geographies. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied housing units and aggregate peer lending in these geographies.

Kenosha County AA

North Shore's geographic distribution of home mortgage loans in 2017 and 2018 is good. The percentage of bank loans originated in low-income geographies is below the percentage of owner-occupied housing units and aggregate peer lending in these geographies. The percentage of loans originated in moderate-income geographies exceeds the percentage of owner-occupied housing units and aggregate peer lending in these geographies.

North Shore's geographic distribution of home mortgage loans in 2016 is adequate. The bank did not originate any loans in low-income geographies, but the percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied housing units and aggregate peer lending in these geographies.

Small Loans to Businesses

Refer to table Q in the State of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Milwaukee MSA

North Shore's geographic distribution of small loans to businesses in 2017 and 2018 is excellent. The percentage of small loans to businesses in low-income geographies is near to the percentage of businesses in low-income geographies and exceeds aggregate peer lending data in those geographies. The percentage of small loans to businesses in moderate-income geographies significantly exceeds the percentage of businesses in moderate-income geographies and aggregate peer lending in those geographies.

North Shore's geographic distribution of small loans to businesses in 2016 is good. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in low-income geographies and exceeds aggregate peer lending. The percentage of small loans to businesses in moderate-income geographies is below the percentage of businesses in moderate-income geographies and aggregate peer lending in those geographies.

Kenosha County AA

North Shore's geographic distribution of small loans to businesses in 2017 and 2018 is excellent. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in low-income geographies and exceeds aggregate peer lending data in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses in moderate-income geographies and aggregate peer lending in those geographies.

North Shore's geographic distribution of small loans to businesses in 2016 is good. The percentage of small loans to businesses in low-income geographies is below the percentage of businesses in low-income geographies, but exceeds aggregate peer lending data in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses in moderate-income geographies and aggregate peer lending in those geographies.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed summary reports and maps and analyzed North Shore's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, considering the product lines offered by the institution.

Home Mortgage Loans

Refer to table P in the State of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Milwaukee MSA

North Shore's borrower distribution of home mortgage loans in 2017 through 2018 is excellent. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, but exceeds aggregate peer lending data. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA and exceeds the percentage of aggregate peer lending data in the AA.

North Shore's borrower distribution of home mortgage loans in 2016 is good. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, but exceeds aggregate peer lending data. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families in the AA and near to aggregate peer lending data.

Kenosha County AA

North Shore's borrower distribution of home mortgage loans in 2017 through 2018 is excellent. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, but exceeds aggregate peer lending data. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA and exceeds the percentage of aggregate peer lending data in the AA.

North Shore's borrower distribution of home mortgage loans in 2016 is adequate. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA, but near to aggregate peer lending data. The percentage of loans to moderate-income borrowers is below the percentage of moderate-income families in the AA and aggregate peer lending data.

Small Loans to Businesses

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

Milwaukee MSA

North Shore's borrower distribution of small loans to small businesses (businesses with gross annual revenues of \$1.0 million or less) in 2017 through 2018 is poor. The percentage of small loans to small businesses is below the percentage of small businesses in the AA. The percentage of small loans to small businesses is also below aggregate peer lending data.

North Shore's borrower distribution of small loans to small businesses in 2016 is good. The percentage of small loans to small businesses is below the percentage of small businesses in the AA, but exceeds aggregate peer lending data.

Kenosha County AA

North Shore's borrower distribution of small loans to small businesses in 2017 through 2018 is good. The percentage of small loans to small businesses is below the percentage of small businesses in the AA, but exceeds aggregate peer lending data.

North Shore's borrower distribution of small loans to small businesses in 2016 is good. The percentage of small loans to small businesses is below the percentage of small businesses in the AA, but exceeds the aggregate peer lending data.

Community Development Lending

The institution has made a relatively high level of CD loans. This performance had a positive impact on the Lending Test. During the evaluation period, the bank made 40 loans totaling \$63.6 million in CD loans in all of the bank's AAs. A majority of these loans were to finance multifamily affordable housing.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Milwaukee MSA

North Shore's high level of CD lending had a significant positive impact on its overall lending performance in the Milwaukee MSA. The bank originated 17 CD loans in the AA during the evaluation period, totaling \$30.3 million. This amount represents 19.58 percent of tier 1 capital allocated to the AA. The bank's CD loans demonstrated excellent responsiveness to AA needs. These loans support affordable housing needs and economic development. The following are several examples of these loans:

- The bank refinanced a \$2.9 million loan on a 62-unit apartment complex located in a moderate-income CT in Milwaukee County. All units within this complex are affordable to LMI households based on rental information.
- The bank refinanced a \$5.3 million loan on a 127-unit apartment complex located in Washington County. All units within this complex are affordable to LMI households based on rental information.
- The bank refinanced a \$1.3 million loan to a borrower located in a low-income CT in Milwaukee County. This funding allowed the business to continue operations in an LMI area and continue employing LMI individuals.
- The bank refinanced a \$5.6 million loan on a 122-unit apartment complex located in Milwaukee County. All units within this complex are affordable to LMI households based on rental information.
- The bank originated a \$464,000 loan for the purchase of an 8-unit apartment complex located in a moderate-income CT. All units within this complex are affordable to LMI households.

Kenosha County AA

North Shore's level of CD lending had a neutral impact on its overall lending performance in the Kenosha AA. The bank originated one CD loan in the AA during the evaluation period, totaling \$200,000. This was a tax anticipation note originated for a school district to cover general expenses. A majority of the students in this school district qualify for free/reduced lunch. This loan amount represents 2.27 percent of tier 1 capital allocated to the AA.

Product Innovation and Flexibility

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. In particular, lending products included in the analysis offer flexibility for borrowers who do not qualify for, or would have difficulty obtaining, traditional financing.

During the review period, the bank originated 179 WHEDA loans, totaling \$21.6 million. WHEDA offers 30-year fixed loans to LMI home buyers in Wisconsin. The bank originated 53 VA loans, totaling \$11.8 million. The bank also participated in the Home Affordable Refinance Program (HARP), facilitating 26 loans, totaling \$3.6 million.

During the review period, the bank purchased two loans from Habitat for Humanity of Waukesha, totaling \$52,000. The purchase of these mortgage loans from the organization provides needed liquidity to the organization and addresses the needs of low-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test is consistent with the bank's overall performance under the Lending Test in the full-scope areas. Performance in the limited-scope AAs did not significantly affect the lending test for the State of Wisconsin.

Refer to tables O through R in the State of Wisconsin section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Wisconsin is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee MSA is good and in the Kenosha County AA is adequate.

The institution has an adequate level of qualified investments, particularly those that are not provided by private investors, occasionally in a leadership role.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution makes occasional use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Milwaukee MSA	1	175	49	3,094	50	49.50	3,269	51.20		
Kenosha AA	1	74	10	722	11	10.89	796	12.46		
Appleton MSA	0	0	1	445	1	1.00	445	6.98		
Green Bay MSA	0	0	22	905	22	21.78	905	14.17		
Non-MSA	0	0	0	0	0	0.00	0	0.00		
Oshkosh-Neenah MSA	0	0	0	0	0	0.00	0	0.00		
Racine MSA	1	19	16	951	17	16.83	970	15.19		

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

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

Milwaukee MSA

During the evaluation period, North Shore made a good level of investments within this AA. When considering both current and prior period investments, the total of \$3.3 million represents 2.1 percent of tier 1 capital for the AA. The following are examples of these investments:

- At the previous evaluation, the bank received credit for an investment in a Fannie Mae CRA Loan Pool. The pool currently has an outstanding balance of \$270,000, of which \$175,000 was allocated to the Milwaukee MSA.
- North Shore invested \$200,000 in a certificate of deposit in a minority owned bank in Milwaukee.
- North Shore invested \$2.4 million in two Fannie Mae CRA mortgage-backed securities where the underlying mortgages were originated with LMI borrowers.
- North Shore invested \$135,000 in a Freddie Mac CRA mortgage-backed security where the underlying mortgages were originated with LMI borrowers.
- North Shore invested \$204,000 in a Wells Fargo CRA mortgage-backed security where the underlying mortgages were originated with LMI borrowers.
- North Shore invested \$100,000 through 43 donations to organizations that support affordable housing initiatives, economic development, and/or community services targeted towards LMI individuals and geographies.
- At the previous evaluation, North Shore received credit for an investment in Historic Tax Credits. This funded a renovation project of a building in a low-income neighborhood in the City of Milwaukee, which was used as a job training program. In 2017, the bank allowed the organization to sell the building with proceeds used to fund operations. The bank granted 100 percent of the sale price to the operating fund of the organization.
- The bank continues to offer Downpayment Plus (DPP) grant funds available from the Federal Home Loan Bank. During the evaluation period, the bank provided 99 grants totaling \$594,000 in DPP grants for loans originated by North Shore.

Community Development Investment – Wisconsin Statewide

The bank invested in a WHEDA revenue bond totaling \$1.2 million that will benefit the broader region of Wisconsin, along with benefits to the bank's AAs. The investment will be used to fund mortgage loans secured by multifamily housing projects.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the limited-scope areas is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

North Shore made use of a complex investment in the Green Bay, Wisconsin MSA. The bank made an equity equivalent investment (EQ2) of \$300,000 to a non-profit housing organization in Green Bay, Wisconsin. The organization sought a capital infusion that would continue to fund down payment closing costs as affordable zero percent deferred second mortgages.

The bank acts as an intermediary to the DPP Advantage program for both the Fox Cities and Door County Habitat for Humanity organizations. In 2017 and 2018, North Shore administered 30 DPP Advantage grants for non-profit organizations totaling \$180,000.

SERVICE TEST

The bank's performance under the Service Test in Wisconsin is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee MSA is good and in the Kenosha County AA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Milwaukee MSA	69.26	24	57.14	4.17	8.33	45.83	41.67	16.71	14.85	33.73	34.70
Kenosha AA	3.94	3	7.14	0.00	66.67	33.33	0.00	12.97	38.20	48.83	0.00
Appleton MSA	2.56	1	2.38	0.00	100.00	0.00	0.00	0.00	15.90	73.93	10.18
Green Bay MSA	8.72	6	14.29	0.00	16.67	66.67	16.67	2.30	26.53	45.68	25.01
Non-MSA	4.82	2	4.76	0.00	0.00	100.00	0.00	0.00	0.00	100.00	0.00
Oshkosh-Neenah MSA	1.39	1	2.38	0.00	0.00	100.00	0.00	0.00	28.90	71.10	0.00
Racine MSA	9.31	5	11.90	0.00	20.00	80.00	0.00	6.67	20.32	53.28	18.91

Milwaukee MSA

North Shore's branch distribution in the Milwaukee MSA is adequate. Branches are accessible to all portions of the AA, particularly LMI individuals. The bank has one branch, or 4.17 percent of its branch distribution in the AA, located in low-income geographies, where 16.71 percent of the population resides. The bank has two branches, or 8.33 percent of its branch distribution in the AA, located in moderate-income geographies, where 14.85 percent of the population resides.

Kenosha County AA

North Shore's branch distribution in the Kenosha County AA is adequate. Branches are reasonably accessible to all portions of the AA, particularly LMI individuals. The bank has no branches located in low-income geographies. The bank has two branches, or 66.67 percent of its branch distribution in the AA, located in moderate-income geographies, where 38.20 percent of the population resides.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
Milwaukee MSA	0	5	-1	-1	-2	-1
Kenosha AA	0	0	0	0	0	0
Appleton MSA	0	0	0	0	0	0
Green Bay MSA	0	0	0	0	0	0
Non-MSA	0	1	0	0	-1	0
Oshkosh-Neenah MSA	0	0	0	0	0	0
Racine MSA	0	0	0	0	0	0

Milwaukee MSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AAs, particularly LMI geographies and/or individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

North Shore created a strategy to deploy video tellers in its branch footprint. Since 2015, 18 video teller machines have been installed. Video teller machines have been installed in some areas where a fully staffed branch was not profitable. As an example, the bank closed a branch in a low-income CT, but installed a video teller at the same location in order to continue the services offered to that area.

Kenosha County AA

The bank did not open or close any branches during the evaluation period in this AA. Its services, including where appropriate, business hours, are tailored to the convenience and needs of its AAs, particularly LMI geographies and/or individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Community Development Services

The institution provides an adequate level of CD services.

Milwaukee MSA

In the Milwaukee MSA, North Shore's performance for providing CD services is adequate. Within the AA, employees provided services to 24 different organizations. These organizations supported affordable housing, community services, and economic development. Employees demonstrated leadership and served on the board of directors or as a committee member of these organizations. Some examples are detailed below:

- One bank employee serves as board member and chairperson for a nonprofit that serves families throughout Milwaukee's inner city through the purchase and rehab of formerly vacant foreclosures.
- One employee is the co-chair of the revolving loan fund committee for the African American Chamber of Commerce and a member of the Business Improvement District. The Chamber supports the growth and sustainability of businesses through access to capital, advocacy, and business development.
- One employee serves as a board member for an organization that provides transitional living services to the homeless in Milwaukee County.
- One employee serves as a board member for a nonprofit organization established by the City of Milwaukee to promote reinvestment in both housing and commercial structures in the City of Milwaukee.

- One employee serves as a board member for the Latino Chamber of Commerce. The Chamber fosters economic development in Wisconsin by advocating, strengthening, and promoting growth and development for Latino and other minority owned businesses.
- In addition, employees of the bank conducted 44 home buying and home counseling seminars. Bank employees also facilitated 27 credit workshops at schools, workplaces, and agencies.

Kenosha County AA

In the Kenosha County AA, one North Shore employee provided expertise to one CD organization. The employee is a member of the planning commission for Asset Builders of America. Asset Builders is a non-profit organization that teaches financial capability and economic empowerment to LMI youth and families. In addition, employees of the bank conducted nine home buying and home counseling seminars. Bank employees also facilitated two financial literacy classes.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test is consistent with the bank's overall performance under the Service Test in the full-scope areas. Service delivery systems are accessible to geographies and individuals of different income levels in the limited-scope AAs. The record for opening and closing branches has not adversely affected the accessibility of its delivery systems. Overall, the institution provides an adequate level of CD services.

State Rating

State of Illinois

CRA rating for the State of Illinois: Low Satisfactory.

The Lending Test is rated: Low Satisfactory.

The Investment Test is rated: Low Satisfactory.

The Service Test is rated: Low Satisfactory.

The major factors that support this rating include:

- During the evaluation period, the institution did not originate or purchase a sufficient number of home mortgage or small business loans to perform a meaningful analysis.
- The institution has an adequate level of qualified investments, particularly those that are not routinely provided by private investors, although rarely in a leadership position.
- North Shore's service delivery systems are reasonably accessible to geographies and individuals of different income levels.
- The institution provides an adequate level of CD services.

Description of Institution's Operations in Illinois

North Shore has one AA within the State of Illinois. The AA is a portion of the Chicago-Joliet-Naperville, IL MD, which includes only McHenry County. There continues to be a significant reduction in lending activity in this AA.

North Shore provides a full range of loan and deposit products to this AA. North Shore has two branches within the state, representing 4.55 percent of the bank's total branch network. There were no branch openings or closings in the state during the evaluation period.

There is very strong competition within this AA. Based upon FDIC Deposit Market Share data as of June 30, 2018, the bank ranked 24th among 28 financial institutions in the state in deposits, representing a 0.56 percent market share. North Shore is ranked in the bottom 1 percent of total depository intuitions, indicating substantial competition in the area. North Shore's statewide deposits totaled \$5.3 million.

Table A – Demographic Information of the Assessment Area						
Assessment Area: North Shore Chicago MD McHenry County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	52	0.0	5.8	48.1	46.2	0.0
Population by Geography	307,357	0.0	4.0	48.1	47.9	0.0
Housing Units by Geography	116,772	0.0	3.9	50.8	45.3	0.0
Owner-Occupied Units by Geography	88,257	0.0	2.6	47.7	49.7	0.0
Occupied Rental Units by Geography	21,234	0.0	8.5	61.8	29.8	0.0
Vacant Units by Geography	7,281	0.0	5.5	57.3	37.2	0.0
Businesses by Geography	16,846	0.0	3.2	45.8	51.0	0.0
Farms by Geography	773	0.0	4.8	65.3	29.9	0.0
Family Distribution by Income Level	82,365	14.5	15.2	21.1	49.2	0.0
Household Distribution by Income Level	109,491	16.2	13.2	18.1	52.5	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$77,500	Median Housing Value			\$210,088
			Median Gross Rent			\$1,119
			Families Below Poverty Level			5.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's designated Chicago-Joliet-Naperville, IL MD AA includes McHenry County only. McHenry County has a combination of rural and suburban characteristics. The northern and western sections of the county retain a rural character and much agricultural activity, while the southeastern sections of the county have become developed as suburban bedroom communities for the northwest suburban area of Chicago and for the City of Chicago itself.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 52 CTs, of which zero are low-income, three (5.77 percent) are moderate-income, 25 (48.08 percent) are middle-income, and 24 (46.15 percent) are upper-income. The total population of the AA is 370,357, which is comprised of 82,365 families. The number of families at each income level is: 11,920 low-income families (14.47 percent), 12,560 moderate-income families (15.25 percent), 17,355 middle-income families (21.07 percent), and 40,530 upper-income families (49.21 percent). The average median family income is \$90,668, and the FFIEC 2017 updated MSA median family income is \$77,500. The percentage of families below the poverty level is 5.5 percent. Owner-occupied units comprise 75.58 percent of total housing units. Based on 2017 demographic data, the total number of businesses with reported revenues in this AA was 16,846. Of these businesses, 14,169 (84.11 percent) had gross revenues of \$1 million or less, 1,113 (6.61 percent) had gross revenues over \$1 million, and 1,564 (9.28 percent) did not report revenue.

Employment and Economic Factors

According to the Bureau of Labor Statistics (<http://beta.bls.gov>), unemployment in McHenry County improved during the evaluation period. The unemployment rate in McHenry County fell from 5.4 percent in December 2014 to 3.5 percent in December 2018. Unemployment in the state of Illinois fell from 5.8 percent in December 2014 to 4.4 percent in December 2018.

According to Moody’s Analytics dated February 2019, the pace of job creation in high- and mid-wage occupations, which include hospitals, manufacturing, and transportation/warehousing, is close to the strongest it has been. A revival in manufacturing has done wonders for the economy over the last year. Datausa.io reports that the economic sectors providing the greatest numbers of jobs in McHenry County are manufacturing, retail trade, and healthcare and social assistance. Major employers include Centegra Health System, Follett Library Resources, Inc., Follett Software Company, and Catalent Pharma Solutions.

We reviewed a community contact that was performed for this AA. The contact was from an Economic Development Corporation in the area. The community contact noted that bankers are out in the community making attempts to connect with businesses of all sizes. Small businesses are not interested in becoming over-leveraged.

Scope of Evaluation in Illinois

We performed a full-scope review of this AA. The institution did not originate/purchase a sufficient number of home mortgage or small business loans during the evaluation period to perform a meaningful analysis. The bank did not originate any small farm loans. Primary loan products are products in which the institution originated at least 20 loans within the AA during the evaluation period. We will base our conclusions on the bank-wide lending activity and the bank’s performance of lending inside the AAs. Consideration is given to the bank’s limited presence and the level of competition in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

In concluding on overall lending activity, we gave more consideration to the bank’s excellent lending activity in the State of Wisconsin. There are significantly more lenders operating in this area and the bank has a minimal presence in this market. Based on 2017 peer mortgage data, the top three lenders in the area for home mortgage loans included Wells Fargo with 7.77 percent, JP Morgan Chase with 7.20 percent, and US Bank with 4.73 percent of the market share. The top three lenders in the area for small business loans included Chase Bank with 14.36 percent, Citibank with 13.79 percent, and American Express with 13.63 percent of the market share.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
McHenry	15	19	0	0	34	100.00	100.00

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
McHenry	2,370	3,035	0	0	5,405	100.00	100.00

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Distribution of Loans by Income Level of the Geography

The bank did not originate or purchase enough loans to analyze geographic distribution of loans in this AA.

Home Mortgage Loans

Refer to table O in the State of Illinois section of 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

Refer to table Q in the State of Illinois section of 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.

Distribution of Loans by Income Level of the Borrower

The bank did not originate or purchase enough loans to analyze borrower distribution of loans in this AA.

Home Mortgage Loans

Refer to table P in the State of Illinois section of 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

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

Community Development Lending

North Shore did not originate or renew any CD loans during the evaluation period. We took into consideration that this AA is not substantial for deposits and there is very strong competition. Given the bank's minimal presence in this market, CD opportunities are limited.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending.

Product Innovation and Flexibility

The institution does not use innovative and/or flexible lending practices in order to serve AA credit needs.

Refer to tables O through R in the State of Illinois section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Illinois is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in Illinois is adequate.

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago-Joliet-Naperville, IL MD	1	21	5	176	6	100.00	197	100.00		

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

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

- At the previous evaluation, the bank received credit for an investment in a Fannie Mae CRA Loan Pool. The pool currently has an outstanding balance of \$270,000, of which \$21,000 was allocated to this AA.
- North Shore invested \$119,000 in a Freddie Mac CRA mortgage-backed security where the underlying mortgages were originated with LMI borrowers.
- North Shore renewed a \$50,000 equity equivalent investment in a Community Development Financial Institution, which primarily lends to nonprofit organizations for their facility’s needs. These borrowers are nonprofit organizations that primarily serve LMI needs. North Shore is meeting one credit need in this area.
- During the evaluation period, North Shore invested \$7,500 through three donations to an organization that supports affordable housing initiatives, economic development, and/or community services targeted towards LMI individuals and geographies.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
McHenry	100.00	2	100.00	0	0	100.00	0	0.00	4.03	48.09	47.88

North Shore's branch distribution in the AA is adequate. The two branches located in this AA are located in middle-income CTs, which would not provide a meaningful analysis. The branches are also surrounded by middle- and upper-income CTs. One branch is located in Lake of the Hills, Illinois and one is located in McHenry, Illinois.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There have been no branch openings or closing during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly LMI geographies and/or individuals. Services and banking hours are comparable among locations regardless of the income level of the geography.

Community Development Services

The institution provides an adequate level of CD services. In this AA, one North Shore employee provided expertise to one CD organization. The employee is a board member for an organization that

provides community services. In addition, employees of the bank conducted three home buying and home counseling seminars.

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 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.”

Time Period Reviewed:	January 1, 2015 through December 31, 2018	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Wisconsin		
Milwaukee-Waukesha-West Allis, WI MSA	Full-scope	All of Milwaukee, Ozaukee, Washington, and Waukesha Counties
Lake County-Kenosha County, IL-WI MD	Full-scope	All of Kenosha County
Appleton, WI MSA	Limited-scope	Portion of Calumet and Outagamie Counties
Green Bay, WI MSA	Limited-scope	All of Brown County
Non-MSA	Limited-scope	All of Door County
Oshkosh-Neenah, WI MSA	Limited-scope	Portion of Winnebago County
Racine, WI MSA	Limited-scope	All of Racine County
State of Illinois		
Chicago-Joliet-Naperville, IL MD	Full-scope	All of McHenry County

Appendix B: Summary of State Ratings

RATINGS North Shore Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
North Shore Bank	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
Wisconsin	High Satisfactory	Low Satisfactory	Low Satisfactory	High Satisfactory
Illinois	Low Satisfactory	Low Satisfactory	Low Satisfactory	Low Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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 loans are treated the same 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% 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	
Appleton MSA	36	11,155	2.6	3,842	0.0	0.0	0.0	13.0	16.7	13.7	74.8	72.2	73.9	12.1	11.1	12.5	0.0	0.0	0.0	
Green Bay MSA	131	34,378	9.5	8,865	1.2	0.0	1.3	21.4	14.5	21.6	50.0	51.1	47.1	27.4	34.4	30.0	0.0	0.0	0.0	
North Shore Kenosha MSA	64	9,009	4.6	5,032	8.0	6.3	8.0	36.5	37.5	35.4	55.5	56.3	56.6	0.0	0.0	0.0	0.0	0.0	0.0	
North Shore Milwaukee MSA	831	158,670	60.3	43,421	7.3	4.7	3.8	11.9	11.3	11.7	36.2	33.6	38.4	44.5	50.4	46.1	0.0	0.0	0.0	
North Shore Oshkosh Neenah MSA	6	3,194	0.4	864	0.0	0.0	0.0	17.2	33.3	19.2	82.8	66.7	80.8	0.0	0.0	0.0	0.0	0.0	0.0	
North Shore Racine MSA	176	30,611	12.8	5,874	2.7	2.3	1.0	16.1	6.8	15.5	57.4	67.0	59.7	23.6	23.9	23.5	0.2	0.0	0.3	
North Shore WI Non-MSA	133	29,113	9.7	1,251	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	1,377	276,128	100.0	69,149	5.7	3.4	3.2	15.0	11.4	15.0	44.5	48.1	46.3	34.7	37.0	35.5	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
North Shore Appleton MSA	36	11,155	2.6	3,842	20.0	16.7	9.9	18.1	30.6	22.4	23.7	16.7	23.9	38.2	30.6	31.7	0.0	5.6	12.1		
North Shore Green Bay MSA	131	34,378	9.5	8,865	19.9	8.4	7.2	18.2	22.9	20.5	21.4	29.0	22.6	40.5	35.1	34.7	0.0	4.6	15.0		
North Shore Kenosha MSA	64	9,009	14.2	5,032	29.6	20.3	15.8	21.6	29.7	25.4	22.3	18.8	21.7	26.4	29.7	23.1	0.0	1.6	14.0		
North Shore Milwaukee MSA	831	158,670	60.3	43,421	23.5	7.9	6.0	16.2	16.5	15.9	19.4	24.9	22.4	40.9	43.4	41.3	0.0	7.2	14.4		
North Shore Oshkosh Neenah MSA	6	3,194	1.3	864	24.5	50.0	11.9	23.7	16.7	30.3	24.4	0.0	22.8	27.4	0.0	21.6	0.0	33.3	13.3		
North Shore Racine MSA	176	30,611	12.8	5,874	20.0	9.7	6.6	17.8	18.2	19.2	21.9	31.3	22.9	40.3	38.6	36.3	0.0	2.3	14.9		
North Shore WI Non-MSA	133	29,113	9.7	1,251	14.3	5.3	6.5	17.8	15.0	12.9	26.2	27.1	18.8	41.7	49.6	48.8	0.0	3.0	13.1		
Total	1,377	276,128	100.0	69,149	22.9	8.9	7.2	17.1	18.2	18.0	20.4	25.7	22.4	39.6	41.5	38.1	0.0	5.7	14.3		

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																			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	
North Shore Appleton MSA	7	806	4.5	1,351	0.0	0.0	0.0	16.1	14.3	14.8	73.3	71.4	73.4	10.5	14.3	11.8	0.0	0.0	0.0	
North Shore Green Bay MSA	10	567	3.2	3,586	3.5	0.0	3.4	27.8	40.0	26.2	44.6	60.0	43.8	24.1	0.0	26.5	0.0	0.0	0.0	
North Shore Kenosha MSA	35	5,868	22.2	2,128	8.8	11.4	7.5	36.5	40.0	32.9	54.7	48.6	59.6	0.0	0.0	0.0	0.0	0.0	0.0	
North Shore Milwaukee MSA	233	44,458	147.5	26,211	10.9	10.3	7.7	11.8	17.6	9.9	35.4	21.5	34.0	41.7	50.2	48.3	0.0	0.4	0.0	
North Shore Oshkosh Neenah MSA	4	323	1.3	213	0.0	0.0	0.0	37.9	100.0	31.0	62.1	0.0	69.0	0.0	0.0	0.0	0.0	0.0	0.0	
North Shore Racine MSA	13	1,307	8.3	2,614	5.3	0.0	5.4	18.5	7.7	15.5	54.2	30.8	53.4	19.2	61.5	21.8	2.9	0.0	3.9	
North Shore WI Non-MSA	12	2,054	3.8	655	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	314	55,518	198.7	36,758	8.8	8.9	6.6	15.7	20.7	13.4	42.2	29.9	40.7	33.0	40.1	39.0	0.2	0.3	0.3	

*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*

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
North Shore Appleton MSA	7	941	3.2	1,351	76.4	85.7	50.7	8.6	50.0	15.0	0.0
North Shore Green Bay MSA	10	567	3.8	3,586	76.7	83.3	49.6	9.3	50.0	14.0	0.0
North Shore Kenosha	35	5,868	12.2	2,128	81.6	54.3	49.3	6.4	37.1	11.9	15.8
North Shore Milwaukee MSA	233	44,458	75.6	26,211	78.9	33.9	49.7	9.3	65.2	11.9	1.7
North Shore Oshkosh Neenah MSA	4	323	1.9	213	77.9	100.0	48.4	7.6	0.0	14.5	0.0
North Shore Racine MSA	13	1,307	5.7	2,614	81.2	69.2	45.8	7.4	30.8	11.4	0.0
North Shore WI Non-MSA	12	2,054	4.4	655	83.5	75.0	56.3	6.5	14.3	10.0	40.0
Total	314	55,518	100.0	36,758	78.9	41.7	49.5	8.9	56.1	12.2	4.5

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
North Shore Chicago MD 2017	12	1,504	100.0	11,875	0.0	0.0	0.0	2.6	0.0	2.5	47.7	58.3	47.2	49.7	41.7	50.3	0.0	0.0	0.0
Total	12	1,504	100.0	11,875	0.0	0.0	0.0	2.6	0.0	2.5	47.7	58.3	47.2	49.7	41.7	50.3	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
North Shore Chicago MD 2017	12	1,504	133.3	11,875	14.5	16.7	6.8	15.2	16.7	19.2	21.1	25.0	23.3	49.2	33.3	34.5	0.0	8.3	16.2		
Total	12	1,504	133.3	11,875	14.5	16.7	6.8	15.2	16.7	19.2	21.1	25.0	23.3	49.2	33.3	34.5	0.0	8.3	16.2		

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																			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		
North Shore Chicago MD 2017	15	2,416	166.7	6,370	0.0	0.0	0.0	3.2	0.0	2.7	45.8	80.0	45.3	51.0	20.0	52.0	0.0	0.0	0.0		
Total	15	2,416	166.7	6,370	0.0	0.0	0.0	3.2	0.0	2.7	45.8	80.0	45.3	51.0	20.0	52.0	0.0	0.0	0.0		

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
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	
North Shore Chicago MD 2017	15	2,416	100.0	6,370	83.6	20.0	50.3	6.7	73.3	9.7	11.1	
Total	15	2,416	100.0	6,370	83.6	20.0	50.3	6.7	73.3	9.7	11.1	

*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*