



## PUBLIC DISCLOSURE

June 13, 2022

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank and Trust Company  
**Charter Number 2725**  
345 East Grand Avenue  
Beloit, WI 53512

Office of the Comptroller of the Currency  
Downers Grove Field Office  
2001 Butterfield Road, Suite 400  
Downers Grove, IL 60515

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 **Outstanding**.

**The lending test is rated: Outstanding.**

**The community development test is rated: Outstanding.**

The major factors that support these ratings include:

- First National Bank and Trust Company's (FNBTC or bank) geographic distribution of loans among geographies of different income levels within its assessment areas (AAs) is excellent.
- FNBTC's distribution of loans to borrowers of different income levels within its AAs is excellent.
- FNBTC has exhibited excellent responsiveness to the community development (CD) needs of its Wisconsin AAs.
- FNBTC's loan-to-deposit (LTD) ratio is reasonable.
- FNBTC has originated a substantial majority of its loans inside its AAs.
- FNBTC did not receive any complaints regarding its CRA performance during the evaluation period.

### Loan-to-Deposit Ratio

Considering FNBTC's size and financial condition, and credit needs of its AAs, the bank's loan-to-deposit ratio is reasonable. During the 12-quarter period ending December 31, 2021, the bank's quarterly LTD ratio averaged 74.5 percent. The LTD ratio is calculated on a bank-wide basis.

We compared FNBTC's quarterly LTD ratio to the ratios for two similarly situated institutions in FNBTC's AAs that ranged in asset size from \$1.3 billion and \$1.7 billion. The combined average quarterly LTD ratio for the similarly situated banks and thrifts was 67.1 percent during the same period of time. FNBTC's LTD ratio was the highest in this group.

### Lending in Assessment Area

A substantial majority of FNBTC's loans are inside its AAs. During the evaluation period, the bank originated or purchased 86.8 percent of its loans (by number) from inside its AAs. This analysis is performed at the bank, rather than the AA, level. The percentage does not include extensions of credit by affiliates which may be considered under other performance criteria.

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	2,692	87.0	404	13.0	3,096	449,477	82.6	94,934	17.4	544,411
Business	66	82.5	14	17.5	80	15,308	82.1	3,346	17.9	18,654
<b>Total</b>	<b>2,758</b>	<b>86.8</b>	<b>418</b>	<b>13.2</b>	<b>3,176</b>	<b>464,785</b>	<b>82.5</b>	<b>98,280</b>	<b>17.5</b>	<b>563,065</b>

Source: Bank HMDA data 2019-2021 and random sample of 80 business loans originated between 1/1/2019 and 12/31/2021.

## Description of Institution

FNBTC is a \$1.5 billion nationally chartered interstate bank headquartered in Beloit, Wisconsin, approximately 0.3 miles from the Wisconsin-Illinois border. The bank serves both the Wisconsin and Illinois markets and is a wholly owned subsidiary of Centre 1 Bancorp, Inc., a one-bank holding company also headquartered in Beloit. The bank has five AAs, including four in Wisconsin and one in Illinois. FNBTC has 16 branch locations including its main office, and 12 offsite ATMs. No branches were opened or closed during this evaluation period.

FNBTC offers alternative delivery channels to further provide access to financial services. In addition to providing its customers with access to its own ATMs, the bank participates in the Allpoint and MoneyPass ATM networks that offer 55,000 and 37,000 surcharge-free ATMs worldwide, respectively. The bank also offers other alternative banking options such as online banking, mobile banking, and remote deposit capture for its commercial and retail customers. In response to the COVID-19 pandemic, the bank provided additional relief to its customers by suspending non-bank ATM fees, late fees, and minimum balance requirements. For individual customers, the bank also suspended safety deposit box drilling, foreclosures, repossessions, and adverse credit reporting. For commercial customers, the bank offered Small Business Administration (SBA) Paycheck Protection Plan (PPP) and Economic Injury Disaster Loans (EIDL) to provide relief from hardships caused by the COVID-19 pandemic. During the evaluation period, the bank originated 1,120 PPP loans totaling \$107.8 million.

FNBTC's business strategy is to be a premier relationship bank focused on residential and commercial lending. As of December 31, 2021, the bank's loan portfolio totaled \$846 million, or 54.7 percent of its total assets. Tier one leverage capital was \$121.7 million during the same time period. Refer to the table below for details regarding the bank's loan portfolio mix.

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding \$
Business Loans, including Commercial Real Estate Loans	57.6
Home Mortgage Loans (including Multifamily)	33.2
Agricultural Loans (including Farmland)	8.1
Consumer Loans	1.1
<b>Total Gross Loans and Leases</b>	<b>100.0</b>

Source: Figures reported in the bank's Report of Condition and Income ("Call Report") for the period-ending December 31, 2021.

There are no legal, financial, or other factors that would hinder the FNBTC's ability to help meet credit needs in its AAs. At its previous CRA Performance Evaluation, dated September 23, 2019, FNBTC received an overall "Outstanding" rating. The bank's performance under both the Lending Test and the Community Development (CD) Test was rated "Outstanding."

## **Scope of the Evaluation**

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

FNBTC was evaluated using Intermediate Small Bank (ISB) examination procedures, which employ a Lending Test and a Community Development Test to assess the bank's CRA performance during the evaluation period. The Lending Test evaluates the bank's performance of meeting the credit needs of its AAs through its lending activity. The Lending Test evaluation only includes the bank's primary loan products which were determined to be home mortgage loans and commercial loans. The Community Development Test evaluates the bank's responsiveness to CD needs in its AAs through qualified lending, investments, and services. Our evaluation considered the bank's lending activity as well as CD loans, investments, and services between January 1, 2019, and December 31, 2021 (the evaluation period).

To determine the bank's record of lending inside versus outside the AAs during the evaluation period, we considered all 3,096 home mortgage loans on the bank's Home Mortgage Disclosure Act (HMDA) reports for 2019, 2020, and 2021, as well as a random sample of 80 business loans. The bank's performance for distribution of loans by income level of geography and income level of borrower was determined through our analysis of 2,692 home mortgage loans and 90 business loans originated or purchased within the AAs.

### **Data Integrity**

During April 2022, we tested the accuracy of FNBTC's 2019, 2020, and 2021 HMDA data and determined that the data was reliable for use in this CRA performance evaluation.

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

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

### **Ratings**

The bank's overall rating is a blend of the state ratings for Wisconsin and Illinois. Greater weight was placed on the Wisconsin state rating in determining the bank's overall CRA rating as a substantial majority of deposits (78 percent), branch locations (81 percent), offsite ATMs (100 percent), and home mortgage lending (75 percent) were from, or in, Wisconsin.

Greater weight was placed on home mortgage lending in both Wisconsin and Illinois as the volume of originations (47 percent) significantly exceeded the volume of commercial loan originations (28 percent) during the evaluation period.

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

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

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

# State Rating

## State of Wisconsin

**CRA rating for the State of Wisconsin:** Outstanding

**The Lending Test is rated:** Outstanding

**The Community Development Test is rated:** Outstanding

The major factors that support these rating include:

- FNBTC’s distribution of loans across geographies of different income levels within its Wisconsin AAs is excellent.
- FNBTC’s distribution of loans to individuals of different income levels and businesses of different sizes within its Wisconsin AAs is excellent.
- Based on the full-scope review of the Janesville-Beloit MSA AA, FNBTC has exhibited excellent responsiveness to the CD needs of its Wisconsin AAs through CD loans, qualified investments, and services.
- The limited-scope reviews of the Madison MSA AA and the Non-MSA AA yielded findings consistent with the full-scope review of the Janesville-Beloit MSA AA.

## Description of Institution’s Operations in Wisconsin

FNBTC has three AAs in Wisconsin including Rock County (Janesville-Beloit MSA AA), Green County (Madison MSA AA), and Lafayette and Walworth counties (Non-MSA AA). Within these AAs, the bank has 13 branch locations, including its main office in Beloit, and 12 offsite ATMs. As of June 30, 2021, 78 percent of bank deposits (\$996.8 million) were from these three AAs. According to Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Reports, FNBTC ranked first amongst 28 institutions operating in these AAs with 14.55 percent of all deposits. Furthermore, 75 percent of the home mortgage loans that the bank originated or purchased during the evaluation period were in Wisconsin.

### Janesville-Beloit MSA AA

FNBTC main office, its holding company headquarters, and five branches are located in the Janesville-Beloit MSA AA in Beloit, Clinton, and Janesville, along with nine offsite ATMs. Two of the offices are located in moderate-income CTs, three are in middle-income CTs, and one is in an upper-income CT. Five of the offsite ATMs are located in moderate-income CTs, three are in middle-income CTs, and one is in an upper-income CT. The AA includes all 38 CTs in Rock County. According to 2015 American Community Survey (ACS) data, the county has one low-income CT, 13 moderate-income CTs, 15 middle-income CTs, and nine upper-income CTs.

According to 2015 ACS data, 20.7 percent of families residing in the Janesville-Beloit MSA AA are low-income, 18.2 percent are moderate-income, 21.6 percent are middle-income, and 39.6 percent are upper-income. According to 2021 Dun & Bradstreet (D&B) economic data, 81.4 percent of businesses

located within the AA generate gross annual revenues of \$1million or less, and 96.17 percent of businesses have fewer than 50 employees. Major industries in the AA include services (38 percent) and retail trade (16 percent). Refer to Table A below for further information regarding the Janesville-Beloit MSA AA’s demographics. There are no demographic tables for the Non-MSA AA and the Madison MSA AA because these AAs were only subject to limited-scope reviews during this performance evaluation.

**Table A – Demographic Information of the Assessment Area (Janesville-Beloit MSA AA)**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	38	2.6	34.2	39.5	23.7	0.0
Population by Geography	160,727	1.7	27.6	42.8	27.9	0.0
Housing Units by Geography	68,332	1.6	27.8	43.3	27.3	0.0
Owner-Occupied Units by Geography	44,177	0.8	21.4	46.2	31.7	0.0
Occupied Rental Units by Geography	19,668	2.9	40.3	38.9	17.8	0.0
Vacant Units by Geography	4,487	4.4	36.0	34.3	25.3	0.0
Businesses by Geography	7,908	1.3	27.3	37.1	34.4	0.0
Farms by Geography	509	0.6	6.7	43.2	49.5	0.0
Family Distribution by Income Level	42,099	20.7	18.2	21.6	39.6	0.0
Household Distribution by Income Level	63,845	22.7	17.6	18.4	41.3	0.0
Median Family Income MSA - 27500 Janesville-Beloit, WI MSA		\$60,820	Median Housing Value			\$130,169
			Median Gross Rent			\$736
			Families Below Poverty Level			11.6%

*Source: 2015 ACS and 2021 D&B data.  
Note: Due to rounding, totals may not equal 100.0%.  
(\*) The NA category consists of geographies that have not been assigned an income classification.*

### Non-MSA AA

The Non-MSA AA includes all 27 CTs in Walworth and Lafayette counties. According to 2015 ACS data, the AA has 18 middle-income CTs, eight upper-income CTs, and one undesignated CT. The Non-MSA AA does have any low- or moderate-income CTs. In Walworth County, FNBTC has five branch offices in Delavan, Darien, Elkhorn, Walworth, and Williams Bay, and two offsite ATMs. Of the branch offices, four are located in middle-income CTs and one is located in an upper-income CT. Both of the offsite ATMs are located in middle-income CTs. In Lafayette County, the bank’s Argyle branch office is located in a middle-income CT.

According to 2015 ACS data, 15.8 percent of families residing in the Non-MSA AA are low-income, 17.4 percent are moderate-income, 20.0 percent are middle-income, and 46.8 percent are upper-income. According to 2021 D&B economic data, 82.4 percent of businesses located within the Non-MSA AA generate gross annual revenues of \$1 million or less, and 97.0 percent of businesses have fewer than 50 employees. Major industries in the AA include services (34 percent) and retail trade (14 percent). All five CTs within Lafayette County have been designated as underserved areas.



## Madison MSA AA

The Madison MSA AA includes all eight CTs within Green County. According to 2015 ACS data, the AA has five moderate-income CTs and three middle-income CTs. FNBTC has one branch office and one offsite ATM in the AA, and both are located in moderate-income CTs.

According to 2015 ACS data, 23.7 percent of families residing in the Madison MSA AA are low-income, 22.3 percent are moderate-income, 26.13 percent are middle-income, and 27.8 percent are upper-income. According to 2021 D&B economic data, 82.3 percent of non-farm businesses in the Madison MSA AA generate gross annual revenues of \$1 million or less, and 97.2 percent of businesses have fewer than 50 employees. Major industries in the AA are services (32.8 percent) and agriculture (14.3 percent).

## **Scope of Evaluation in Wisconsin**

The scope of this performance evaluation included a full-scope review for the Janesville-Beloit MSA AA and limited-scope reviews of the Madison MSA AA and Non-MSA AA.

Demographic, economic, and loan data were considered in selecting the AA subject to a full-scope review. In all regards, excluding dollar amount of home mortgage loans during the evaluation period, the Janesville-Beloit MSA AA was the bank's largest and most diverse AA (in terms of geographic income levels) in Wisconsin. As such, the Janesville-Beloit MSA was selected to undergo the full-scope review.

Regarding the full-scope review of the Janesville-Beloit MSA AA, equal consideration was given to the geographic distribution and borrower distribution lending tests.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

## LENDING TEST

FNBTC's performance under the Lending Test in Wisconsin is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the FNBTC's lending performance in the state of Wisconsin is excellent.

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

FNBTC's geographic distribution of loans in its Wisconsin AAs is excellent.

#### Janesville-Beloit MSA AA

##### *Home Mortgage Loans*

Refer to Table O (Wisconsin) in appendix D for the facts and data used to evaluate the geographic distribution of FNBTC's home mortgage loans.

FNBTC's geographic distribution of home mortgage loans in the Janesville-Beloit MSA AA is excellent. During the evaluation period, the bank's percentage of loans originated or purchased in low-income CTs exceeded both the percentage of the AA's owner-occupied housing units located in low-income CTs and the percentage of aggregate lending that occurred in low-income CTs. The bank's percentage of loans originated or purchased in moderate-income CTs exceeded the percentage of the AA's owner-occupied housing units located in moderate-income CTs and significantly exceeded the percentage of aggregate lending that occurred in moderate-income CTs.

##### *Small Loans to Businesses*

Refer to Table Q (Wisconsin) in appendix D for the facts and data used to evaluate the geographic distribution of FNBTC's small loans to businesses.

FNBTC's geographic distribution of small loans to businesses among geographies of different income levels in the Janesville-Beloit MSA AA is reasonable. During the evaluation period, the bank did not originate or purchase any small loans to businesses in low-income CTs. However, there are limited opportunities for business lending in low-income CTs. The AA only has one low-income CT, and only 1.3 percent of the AA's business are located in this CT. Furthermore, only 1.7 percent of aggregate lending occurred in this CT. The bank's percentage of small loans to businesses in moderate-income CTs was near the percentage of the AA's businesses located in moderate-income CTs and exceeded the percentage of aggregate lending that occurred in the moderate-income CTs.

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

FNBTC's distribution of loans to individuals of different income levels and businesses farms of different sizes is excellent.

## Janesville-Beloit MSA AA

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

Refer to Table P (Wisconsin) in appendix D for the facts and data used to evaluate the borrower distribution of FNBTC's home mortgage loans.

FNBTC's distribution of home mortgage loans to individuals of different income levels in the Janesville-Beloit MSA AA is excellent. While the bank's percentage of loans to low-income borrowers was significantly below the percentage of AA families that are low-income, it significantly exceeded the percentage of aggregate lending that occurred to low-income borrowers. The bank's percentage of loans to moderate-income borrowers exceeded both the percentage of AA families that are moderate-income and the percentage of aggregate lending that occurred to moderate-income borrowers.

FNBTC participates in the Wisconsin Housing and Economic Development Authority (WHEDA) Foundation's Housing Grant (down payment assistance) and Fannie Mae's HomeReady programs to provide affordable home mortgage loans to low-and moderate-income individuals and first-time homebuyers. During the evaluation period, the bank originated 58 HomeReady loans totaling \$6.8 million and 128 WHEDA loans totaling \$16.1 million. These loans are included in the HMDA data used in this analysis.

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

Refer to Table R (Wisconsin) in appendix D for the facts and data used to evaluate the borrower distribution of FNBTC's small loans to businesses.

FNBTC's distribution of small loans to businesses in the Janesville-Beloit MSA AA is excellent. The bank's percentage of loans to businesses with \$1 million or less in gross annual revenue exceeded the percentage of AA businesses with \$1 million or less in annual gross revenues and significantly exceeded the percentage of aggregate lending that occurred to businesses with \$1 million or less in gross annual revenue.

### **Responses to Complaints**

FNBTC has not received any written comments or complaints regarding the bank's efforts to meet credit needs in Wisconsin during the evaluation period.

### **Conclusions for Areas Receiving Limited Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Madison MSA AA and the Non-MSA AA is consistent with the overall performance under the Lending Test in the full-scope review of the Janesville-Beloit MSA AA.

## COMMUNITY DEVELOPMENT TEST

FNBTC's performance under the Community Development (CD) Test in Wisconsin is rated Outstanding.

Based on full-scope and limited-scope reviews, FNBTC exhibits excellent responsiveness to CD needs in Wisconsin through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the its AAs.

### Number and Amount of Community Development Loans

Refer to the CD Loan table below for the facts and data used to evaluate the FNBTC's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans – Wisconsin				
Assessment Area	#	% of Total #	\$(000s)	% of Total \$
Janesville-Beloit MSA AA	14	29.8	13,426	50.2
Non-MSA AA	29	61.7	13,053	48.8
Madison MSA AA	4	8.5	278	1.0
<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>26,757</b>	<b>100.0</b>

#### Janesville-Beloit MSA AA

FNBTC's level of CD lending reflects excellent responsiveness to the needs of the community. During the evaluation period, the bank originated 14 qualifying CD loans in the Janesville-Beloit MSA AA totaling \$13.4 million, or 14.1 percent of allocated tier one capital. Significant CD loans in the Janesville-Beloit MSA AA include:

- \$3.5 million participation in a \$7.0 million loan to build a 3,500-seat stadium in a moderate-income CT providing revitalization and stabilization to the area.
- \$2.8 million loan to make improvements to a building that houses a men's homeless shelter, Veteran Affairs office, and thrift shop, which provide community services targeted towards low- and moderate-income individuals.
- \$1.3 million loan to construct a facility in a moderate-income CT for a non-profit organization providing services to low- and moderate-income youth.

## Number and Amount of Qualified Investments

Qualified Investments - Wisconsin										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Janesville-Beloit MSA AA	0	0	118	709	118	67.0	709	89.4	0	0
Non-MSA AA	0	0	30	33	30	17.0	33	4.2	0	0
Madison MSA AA	0	0	28	51	28	16.0	51	6.4	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>176</b>	<b>793</b>	<b>176</b>	<b>100.0</b>	<b>793</b>	<b>100.0</b>	<b>0</b>	<b>0</b>

\* 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.

### Janesville-Beloit MSA AA

FNBTC's level of qualified CD investments reflects poor responsiveness to the needs of the Janesville-Beloit MSA AA. During the evaluation period, FNBTC provided 117 qualified investments totaling \$689,499 and representing less than one percent of allocated tier one capital. The bank's qualified investments were entirely composed of donations. Qualified donations considered in the CD test were related to community services, economic development, revitalization and stabilization, and affordable housing.

Notable CD donations in the Janesville-Beloit MSA AA include:

- A \$250,000 donation to build a new minor league baseball stadium providing revitalization and stabilization to a moderate-income CT.
- \$169,657 in donations to a nonprofit organization that funds other nonprofit organizations providing community services to low- and moderate-income individuals to address poverty, hunger, homelessness, domestic violence, and addiction.
- \$60,000 in donations supporting building improvements to a college located in a moderate-income CT, which helped revitalize and stabilize the area.
- A \$21,025 donation to a community service organization that provides homebuyer and financial education classes, lending and real estate services, and home rehab coaching for low- and moderate-income homebuyers.

### Extent to Which the Bank Provides Community Development Services

The level of qualified CD services provided by FNBTC's employees and officers reflects excellent responsiveness to the needs of its community.

During the evaluation period, FNBTC staff performed 336 services for 1,677 hours in Wisconsin. Of the total services in Wisconsin, 317 were in the Janesville-Beloit MSA AA accounting for 1,529 hours. The majority of qualifying services were in leadership roles with organizations that primarily provide assistance to low- and moderate-income individuals or geographies. The bank also provided a

homebuyer workshop for low- and moderate-income individuals in 2019. The biannual annual homebuyer workshops were stopped in 2020 due to the COVID-19 pandemic.

### **Conclusions for Areas Receiving Limited Scope Reviews**

Based on limited-scope reviews, the bank's performance under the CD Test in the Non-MSA AA and Madison MSA AA is consistent with the overall performance under the CD Test in the full-scope review of the Janesville-Beloit MSA AA.

# State Rating

## State of Illinois

**CRA rating for the State of Illinois:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support these ratings include:

- FNBTC's distribution of loans across geographies of different income levels within its Illinois AA is reasonable.
- FNBTC's distribution of loans to individuals of different income levels and businesses of different sizes within its Illinois AA is excellent.
- Based on the full-scope review of the Rockford MSA AA, FNBTC has exhibited reasonable responsiveness to the CD needs of its Illinois AA through CD loans, qualified investments, and services.

## Description of Institution's Operations in Illinois

### Rockford MSA AA

FNBTC has one AA in Illinois, Winnebago County, which comprises the Rockford MSA AA. Within this AA, the bank has three branch locations in Rockton, Roscoe, and Winnebago, which are all located in upper-income CTs. As of June 30, 2021, 22 percent of the bank's total deposits were from this AA. Furthermore, 25 percent of the home mortgage loans that the bank originated during the evaluation period were in the Rockford MSA AA. The bank's business focus in the Rockford MSA AA is the same for the entire bank.

The Rockford MSA AA includes all 77 CTs in Winnebago County. These include 13 low-income CTs, 18 moderate-income CTs, 21 middle-income CTs, 23 upper-income CTs, and two CTs with no designated income level. The majority of low- and moderate-income CTs are concentrated in the downtown Rockford area, where FNBTC does not have a branch. Of the 77 CTs in Winnebago County, 21 have been designated as distressed geographies due to elevated unemployment levels. Families living below the poverty level account for 12.9 percent of the population, and the average unemployment rate is 7.5 percent (exceeding both state and national levels).

According to 2015 ACS data, 23.0 percent of families residing in the Rockford MSA AA are low-income, 17.0 percent are moderate-income, 20.0 percent are middle-income, and 40.0 percent are upper-income. According to 2021 D&B economic data, 82.3 percent of businesses located in the Rockford MSA AA reported gross annual revenues of \$1 million or less, and 96.3 percent of businesses have less than 50 employees. Major industries in the AA are services (37.3 percent), non-classifiable establishments (15.95 percent), and retail trade (13.4 percent). Refer to the table below for further demographic information on the Rockford MSA AA.

Competition for deposits in the Rockford MSA AA is strong. The AA provides 22 percent of FNBTC’s total deposits. As of June 30, 2021, the FDIC Market Share Report shows that the bank had \$280.8 million in deposits from the AA that represented a 3.95 percent market share, and it ranked 10<sup>th</sup> out of 20 deposit market competitors within the AA. FNBTC’s competition within the AA includes larger financial institutions such as JP Morgan Chase, Midland States Bank, Associated Bank, and BMO Harris Bank. These larger institutions have an average of 6.5 branch locations within the AA compared to FNBTC’s three branch locations.

FNBTC participates in the Illinois Housing Development Authority (IHDA) loan program to provide home mortgage financing for less creditworthy and first-time homebuyers in Illinois. During the evaluation period, the bank originated 37 IHDA loans totaling \$3.7 million. While this activity is captured within the bank’s home mortgage lending data.

## Rockford MSA AA

Table A – Demographic Information of the Assessment Area (Rockford MSA AA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	16.9	23.4	27.3	29.9	2.6
Population by Geography	290,439	12.8	20.3	27.2	39.3	0.4
Housing Units by Geography	125,720	13.2	20.5	27.5	38.1	0.7
Owner-Occupied Units by Geography	75,502	6.1	16.7	29.9	47.3	0.0
Occupied Rental Units by Geography	38,410	23.2	27.0	23.8	24.2	1.8
Vacant Units by Geography	11,808	25.6	23.1	24.6	24.8	1.9
Businesses by Geography	18,204	10.6	15.8	26.2	44.8	2.6
Farms by Geography	614	5.7	14.0	24.9	54.4	1.0
Family Distribution by Income Level	74,809	23.0	17.0	20.0	39.9	0.0
Household Distribution by Income Level	113,912	26.0	16.1	17.8	40.1	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$60,048	Median Housing Value			\$111,424
			Median Gross Rent			\$763
			Families Below Poverty Level			12.9%

Source: 2015 ACS and 2021 D&B data.  
 Note: Due to rounding, totals may not equal 100.0%.  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

## Scope of Evaluation in Illinois

The Rockford MSA AA is FNBTC’s only AA in Illinois. Therefore, the Rockford MSA AA was subject to a full-scope review during this evaluation. Refer to Appendix A for a list of the AA’s under review. Equal consideration was given to the geographic distribution and borrower distribution lending tests.



## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS**

### **LENDING TEST**

FNBTC's performance under the Lending Test in Illinois is rated Satisfactory.

#### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, FNBTC's lending performance in the state of Illinois is reasonable.

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

FNBTC's geographic distribution of loans in its Illinois AA is reasonable considering performance context. The AA's low- and moderate-income CTs are primarily located in the city of Rockford, while the bank's branches are located in smaller towns surrounding Rockford. The Rockton and Roscoe branches are over 12 miles north of Rockford, and the Winnebago branch is nine miles west. A lack of public transportation could make it difficult for borrowers in low- and moderate-income CTs to reach the bank. Competition for loans from larger banks located in the city of Rockford is strong.

##### Rockford MSA AA

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

Refer to Table O (Illinois) in appendix D for the facts and data used to evaluate the geographic distribution of FNBTC's home mortgage loans.

FNBTC's geographic distribution of home mortgage loans in the Rockford MSA AA is reasonable. During the evaluation period, the bank's percentage of loans originated or purchased in low-income CTs was significantly below the percentage of the AA's owner-occupied housing units located in low-income CTs. However, it was reasonably near the percentage of aggregate lending that occurred in low-income CTs. It is appropriate to note that the 13 low-income CTs in the Rockford MSA AA are concentrated within the downtown area of Rockford, where the bank does not have any branch locations. The bank's percentage of loans originated or purchase in moderate-income CTs was also significantly below the percentage of the AA's owner-occupied housing units located in moderate-income CTs, but reasonably near the percentage of aggregate lending that occurred in moderate-income CTs. Of the 18 moderate-income CTs in the Rockford MSA AA, 17 are concentrated in the downtown Rockford area where the bank has no offices.

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

Refer to Table Q (Illinois) in appendix D for the facts and data used to evaluate the geographic distribution of FNBTC's small loans to businesses.

FNBTC's geographic distribution of small loans to businesses in the Rockford MSA AA is reasonable. In reaching this conclusion, we placed more weight on the bank's performance in moderate-income CTs because the 13 low-income CTs in the Rockford MSA AA are concentrated within the downtown area of Rockford, where the bank does not have any branch locations. During the evaluation period, the bank

did not purchase or originate any small loans to businesses located in low-income CTs. However, the bank's percentage of small loans to businesses located in moderate-income CTs was near both the percentage of the AA's small businesses that are located in the moderate-income CTs and the percentage of aggregate lending that occurred in the moderate-income CTs.

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

FNBTC distribution of loans to individuals of different income levels and businesses of different sizes is excellent.

### Rockford MSA AA

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

Refer to Table P (Illinois) in appendix D for the facts and data used to evaluate the borrower distribution of FNBTC's home mortgage loans.

FNBTC's distribution of home mortgage loans to individuals of different income levels in the Rockford MSA AA is excellent. While the bank's percentage of loans to low-income borrowers was significantly below the percentage of AA families that are low-income, but it exceeded the percentage of aggregate lending that occurred to low-income borrowers. Furthermore, the bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of AA families that are moderate-income and the percentage of aggregate lending that occurred to moderate-income borrowers.

FNBTC also participates in the IHDA loan program to provide home mortgage financing for less creditworthy and first-time homebuyers in Illinois. During the evaluation period, the bank originated 37 IHDA loans totaling \$3.7 million. These loans are included in the HMDA data used in this analysis.

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

Refer to Table R (Illinois) in appendix D for the facts and data used to evaluate the borrower distribution of FNBTC's small loans to businesses.

### Rockford MSA AA

FNBTC's distribution of small loans to businesses of different sizes in the Rockford MSA AA is reasonable. The bank's percentage of loans to businesses with \$1 million or less in gross annual revenue was significantly below the percentage of AA businesses with \$1 million or less in gross annual revenue but it significantly exceeded the percentage of aggregate lending that occurred to businesses with \$1 million or less in annual gross revenue.

## **Responses to Complaints**

FNBTC has not received any written comments or complaints regarding the bank's efforts to meet credit needs in Illinois during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Illinois is rated Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, FNBTC exhibits adequate responsiveness to CD needs in the state through a combination of CD loans, qualified investments, and services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending.

Community Development Loans - Illinois				
Assessment Area	#	% of Total #	\$(000s)	% of Total \$
Rockford MSA AA	4	100.0	2,395	100.0

FNBTC's level of qualified CD loans in the Rockford MSA AA represents adequate responsiveness to the needs of its community. During the evaluation period, the bank originated three CD loans totaling \$965,600 and representing 3.6 percent of allocated tier one capital. CD loans in Rockford MSA AA include one \$680,000 loan to fund a new facility for an ambulance service within a moderate-income CT and two loans totaling \$285,600 for renovation of rental properties providing affordable housing for low- and moderate-income individuals.

### Number and Amount of Qualified Investments

Qualified Investments - Illinois										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Rockford MSA AA	0	0	18	1,456	18	100.0	1,456	100.0	0	0

\* 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.

FNBTC's level of qualified investments demonstrated adequate responsiveness to the needs of its AA. During the evaluation period, the bank provided 18 qualified investments totaling \$1.4 million and representing 5.4 percent of allocated tier one capital. Qualified investments include a \$1.4 million bond to fund capital improvements at a free public library in the AA which also houses the local Illinois Legal Aid office which provides free legal services to low-income individuals. The bank also made 17 qualified donations community service organizations providing aid to low- and moderate-income individuals.

## **Extent to Which the Bank Provides Community Development Services**

The level of qualified CD services provided by FNBTC employees and officers reflects excellent responsiveness to the needs of the community.

During the evaluation period, FNBTC staff performed 41 services for 245 hours in Illinois, all of which were in the Rockford MSA AA. The CD services were primarily in leadership roles with organizations related to community services and economic development that primarily provide aid to low- and moderate-income individuals or geographies. The bank also provided a homebuyer workshop for low- and moderate-income individuals in 2019. The biannual annual homebuyer workshops were stopped in 2020 due to the COVID-19 pandemic.

## 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 MSA(s) and non-MSA(s) 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>	01/01/2019 - 12/31/2021	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans, Small Business Loans, Community Development Loans, Qualified Investments, and Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<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>
<b>Wisconsin</b>		
Janesville-Beloit MSA	Full Scope	All of Rock County, WI
Madison MSA	Limited-Scope	All of Green County, WI
Non-MSA	Limited-Scope	All of Lafayette County, WI and Walworth County, WI
<b>Illinois</b>		
Rockford MSA	Full Scope	All of Winnebago County, IL

## Appendix B: Summary of Bank and State Ratings

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<b>RATINGS - The First National Bank and Trust Company</b>			
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>CD Test Rating</b>	<b>Overall Rating</b>
FNBTC	Outstanding	Outstanding	Outstanding
<b>State:</b>			
Wisconsin	Outstanding	Outstanding	Outstanding
Illinois	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## 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:** 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 of the area median income.

**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 30<sup>th</sup> 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 \$1million; 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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending
Janesville-Beloit MSA AA	903	117,397	44.6	8,808	0.8	0.9	0.8	21.4	26.1	14.7	46.2	54.8	44.8	31.7	18.2	39.6	0.0	0.0	0.0
Madison MSA AA	251	34,593	12.4	2,369	0.0	0.0	0.0	50.8	74.5	40.5	49.2	25.5	59.5	0.0	0.0	0.0	0.0	0.0	0.0
Non-MSA AAs	870	213,971	43.0	7,456	0.0	0.0	0.0	0.0	0.0	0.0	64.7	74.8	61.0	35.1	25.2	38.9	0.2	0.0	0.1
<b>Total</b>	<b>2,024</b>	<b>365,960</b>	<b>100.0</b>	<b>18,633</b>	<b>0.4</b>	<b>0.4</b>	<b>0.4</b>	<b>17.2</b>	<b>20.9</b>	<b>12.1</b>	<b>53.4</b>	<b>59.8</b>	<b>53.2</b>	<b>29.0</b>	<b>18.9</b>	<b>34.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data, 2020 HMDA aggregate data.  
Note: 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 Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending
Rockford MSA AA	668	83,517	100.0	11,668	6.1	1.3	2.2	16.7	6.6	10.5	29.9	16.8	29.3	47.3	75.3	58.0	0.0	0.0	0.1
<b>Total</b>	<b>668</b>	<b>83,517</b>	<b>100.0</b>	<b>11,668</b>	<b>6.1</b>	<b>1.3</b>	<b>2.2</b>	<b>16.7</b>	<b>6.6</b>	<b>10.5</b>	<b>29.9</b>	<b>16.8</b>	<b>29.3</b>	<b>47.3</b>	<b>75.3</b>	<b>58.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data, 2020 HMDA aggregate data.  
Note: Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending
Janesville-Beloit MSA AA	903	117,397	44.6	8,808	20.7	11.4	6.1	18.2	20.8	18.5	21.6	22.3	23.4	39.6	41.1	37.8	0.0	4.4	14.0
Madison MSA AA	251	34,593	12.4	2,369	23.7	16.7	11.8	22.3	28.3	22.7	26.1	31.1	26.3	27.8	21.5	28.9	0.0	3.1	10.3
Non-MSA AAs	870	213,971	43.0	7,456	15.8	4.6	2.5	17.4	14.1	12.9	20.1	22.3	19.1	46.8	56.0	53.7	0.0	3.0	11.7
<b>Total</b>	<b>2,024</b>	<b>365,960</b>	<b>100.0</b>	<b>18,633</b>	<b>19.2</b>	<b>9.1</b>	<b>5.4</b>	<b>18.4</b>	<b>18.9</b>	<b>16.8</b>	<b>21.6</b>	<b>23.4</b>	<b>22.1</b>	<b>40.8</b>	<b>45.1</b>	<b>43.1</b>	<b>0.0</b>	<b>3.6</b>	<b>12.7</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data, 2020 HMDA aggregate data.  
Note: Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending
Rockford MSA AA	668	83,517	100.0	11,668	23.0	9.0	7.7	17.0	20.5	18.6	20.0	23.7	20.8	39.9	40.1	31.4	0.0	6.7	21.5
<b>Total</b>	<b>668</b>	<b>83,517</b>	<b>100.0</b>	<b>11,668</b>	<b>23.0</b>	<b>9.0</b>	<b>7.7</b>	<b>17.0</b>	<b>20.5</b>	<b>18.6</b>	<b>20.0</b>	<b>23.7</b>	<b>20.8</b>	<b>39.9</b>	<b>40.1</b>	<b>31.4</b>	<b>0.0</b>	<b>6.7</b>	<b>21.5</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 bank data, 2020 HMDA aggregate data.  
Note: Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending
Janesville-Beloit MSA AA	23	5,645	36.5	1,787	1.3	0.0	1.7	27.3	26.1	23.2	37.1	43.5	37.9	34.4	30.4	37.2	0.0	0.0	0.0
Madison MSA AA	20	3,224	20.9	404	0.0	0.0	0.0	60.9	70.0	59.2	39.1	30.0	40.8	0.0	0.0	0.0	0.0	0.0	0.0
Non-MSA AAs	27	6,577	42.6	2,390	0.0	0.0	0.0	0.0	0.0	0.0	70.8	74.1	70.4	28.2	25.9	29.3	1.0	0.0	0.3
<b>Total</b>	<b>70</b>	<b>15,446</b>	<b>100.0</b>	<b>4,581</b>	<b>0.6</b>	<b>0.0</b>	<b>0.7</b>	<b>20.3</b>	<b>28.6</b>	<b>14.3</b>	<b>51.4</b>	<b>51.4</b>	<b>55.1</b>	<b>27.3</b>	<b>20.0</b>	<b>29.8</b>	<b>0.4</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B data; 01/01/2019 - 12/31/2021 bank data; 2020 CRA aggregate data.  
Note: Due to rounding, totals may not equal 100.0%.

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending
Rockford MSA AA	20	6,081	100.0	4,825	10.6	0.0	9.4	15.8	15.0	16.8	26.2	30.0	26.3	44.8	55.0	44.4	2.6	0.0	3.2
<b>Total</b>	<b>20</b>	<b>6,081</b>	<b>100.0</b>	<b>4,825</b>	<b>10.6</b>	<b>0.0</b>	<b>9.4</b>	<b>15.8</b>	<b>15.0</b>	<b>16.8</b>	<b>26.2</b>	<b>30.0</b>	<b>26.3</b>	<b>44.8</b>	<b>55.0</b>	<b>44.4</b>	<b>2.6</b>	<b>0.0</b>	<b>3.2</b>

Source: 2021 D&B data; 01/01/2019 - 12/31/2021 bank data; 2020 CRA aggregate data.  
Note: Due to rounding, totals may not equal 100.0%.

<b>Table R: Assessment Area Distribution of Small Loans to Businesses by Gross Annual Revenues (Wisconsin)</b>												<b>2019-21</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	# of Bank Loans	\$(000s) of Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of AA Businesses	% of Bank Loans	
Janesville-Beloit MSA AA	23	5,645	36.5	1,787	80.4	82.6	32.5	6.1	8.7	13.5	8.7	
Madison MSA AA	20	3,224	20.9	404	82.3	65.0	43.6	5.6	25.0	12.1	10.0	
Non-MSA AAs	27	6,577	42.6	2,390	82.4	70.4	43.8	6.2	22.2	11.3	7.4	
<b>Total</b>	<b>70</b>	<b>15,446</b>	<b>100.0</b>	<b>4,581</b>	<b>81.5</b>	<b>72.9</b>	<b>39.4</b>	<b>6.1</b>	<b>18.6</b>	<b>12.4</b>	<b>8.6</b>	

*Source: 2021 D&B data; 01/01/2019 - 12/31/2021 bank data; 2020 CRA aggregate data.  
Note: Due to rounding, totals may not equal 100.0%.*

<b>Table R: Assessment Area Distribution of Small Loans to Businesses by Gross Annual Revenues (Illinois)</b>												<b>2019-21</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	# of Bank Loans	\$(000s) of Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of AA Businesses	% of Bank Loans	
Rockford MSA AA	20	6,081	100.0	4,825	82.3	55.0	34.4	6.1	40.0	11.6	5.0	
<b>Total</b>	<b>20</b>	<b>6,081</b>	<b>100.0</b>	<b>4,825</b>	<b>82.3</b>	<b>55.0</b>	<b>34.4</b>	<b>6.1</b>	<b>40.0</b>	<b>11.6</b>	<b>5.0</b>	

*Source: 2021 D&B data; 01/01/2019 - 12/31/2021 bank data; 2020 CRA aggregate data.  
Note: Due to rounding, totals may not equal 100.0%.*