



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

January 28, 2013

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Bank Mutual
Charter Number 717079

4949 West Brown Deer Road
Brown Deer, WI 53223

Office of the Comptroller of the Currency

1200 N Mayfair Road
Suite 200
Wauwatosa, WI 53226

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

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Overall CRA Rating

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

The following table indicates the performance level of Bank Mutual with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		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 institution’s lending levels reflect good responsiveness to the credit needs of its overall assessment area. A high percentage of loans are made in the institution’s overall assessment area (91.1 percent of the total number of Home Mortgage Disclosure Act or HMDA reportable loans and 95.9 percent of the total number of small business loans were made within its assessment area). Bank Mutual’s HMDA lending among borrowers of different income levels reflects good distribution, and its distribution of small business loans to small businesses is excellent. The institution’s overall distribution of HMDA and small business loans reflects adequate distribution throughout the overall assessment area.
- Bank Mutual exhibits good responsiveness to credit and community economic development needs and has an adequate level of qualified community development investments, grants, and donations.
- The institution’s delivery systems are accessible to essentially all portions of its overall assessment area. Bank Mutual does not have any branches or automated teller machines (ATMs) in low-income areas, but its percentage of branches and ATMs located in moderate-income areas is commensurate with the demographics for the overall assessment area.

Definitions and Common Abbreviations

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

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

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

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

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

Activities that revitalize or stabilize-

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

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

Bank Mutual is a federally chartered stock institution headquartered in Brown Deer, Wisconsin. As of December 31, 2012, Bank Mutual had total assets of \$2.4 billion. Bank Mutual is a wholly owned subsidiary of Bank Mutual Corporation, a federal thrift holding company.

Bank Mutual has a total of 76 branch offices, in addition to its corporate headquarters, with 75 being located in Wisconsin and one branch in Minnesota. Twenty-three of the branches, as well as the corporate headquarters, are located in the Milwaukee-Waukesha-West Allis MSA, eight are in the Green Bay assessment area, nine are in the Eau Claire MSA, four are in the Appleton MSA, five are in the Madison assessment area, two are in the Racine MSA, one is in the Janesville MSA, one is in the Fond du Lac MSA, one is in the Oshkosh-Neenah MSA, two are in the Sheboygan MSA, one is in the Kenosha assessment area, 16 are in the Wisconsin Nonmetropolitan assessment area, and three are located in the Minneapolis-St. Paul multistate MSA assessment area. Bank Mutual operates a total of 67 ATMs in the overall assessment area, with 66 being located in Wisconsin and one in Minnesota. There are no known impediments limiting Bank Mutual's ability to help meet the credit needs of its communities, including those of low- and moderate-income families and neighborhoods.

Bank Mutual is a full service financial institution that offers numerous mortgage and consumer loan products. The institution originates owner- and nonowner-occupied conventional first mortgage loans with standard loan-to-value (LTV) ratios. Higher LTV ratios are allowed with private mortgage insurance. Government insured products, such as State of Wisconsin Direct Veterans Administration (State VA), Wisconsin Housing and Economic Development Authority (WHEDA), and Guaranteed Rural Housing loans are also offered. Bank Mutual also originates construction, residential lot, bridge, and multifamily loans. In addition, the institution originates small business loans and lines of credit. Consumer loan financing consists of home improvement, home equity, automobile, motorcycle, boat, recreational vehicle, student, signature, and savings account loans, as well as home equity lines of credit and credit cards.

As of December 31, 2012, Bank Mutual's mortgage loan portfolio totaled \$1.3 billion and represented 54.2 percent of the institution's total assets. Of this amount, \$694.0 million was in loans secured by one- to four-family properties, \$264.0 million was secured by multifamily loans, \$264.0 million was secured by commercial real estate loans, and \$58.3 million was secured by land loans. Nonmortgage loans totaled \$155.4 million and represented 6.4 percent of total assets as of December 31, 2012. Included in this amount were \$132.2 million in commercial business loans and \$23.2 million in consumer loans.

At the previous CRA evaluation, dated May 22, 2008, Bank Mutual also received a rating of "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation of Bank Mutual's CRA performance covers a 60-month review period from January 1, 2008 through December 31, 2012. We conducted an onsite and offsite review of the institution's activities and performance and utilized both full scope and limited scope examination procedures for conducting the lending, investment, and service tests.

With regard to the lending test, we reviewed the institution's HMDA data for 2008, 2009, 2010, 2011 and 2012 for all of the assessment areas. In addition, we reviewed Bank Mutual's small business loan data for the same time period. According to the definition contained in the CRA regulations, small business loans are loans originated in amounts of \$1.0 million or less. We reviewed the institution's community development lending activity for the entire review period, as well as the data provided on its innovative and flexible lending products.

We utilized the HMDA and CRA disclosure statements filed by Bank Mutual to obtain the residential loan and small business loan data for the analyses conducted for this examination. Aggregate HMDA data for 2008, 2009, 2010, and 2011 was used for comparative purposes throughout this report. Aggregate small business loan data for 2008, 2009, 2010 and 2011 was also used for comparative purposes. Aggregate 2012 data for both HMDA reportable and small business loans is not yet available; instead, we compared Bank Mutual's 2012 loan data to 2011 aggregate data. We determined that the peer group for Bank Mutual is other federally regulated and insured financial institutions subject to CRA.

Due to census tract and metropolitan area (MA) revisions made as a result of the information obtained by the U.S. Census Bureau for the 2010 Census, loan data was analyzed using information from both the 2000 Census and the 2010 Census. Loan data from 2008, 2009, 2010, and 2011 was analyzed using census tracts, and MAs defined by the 2000 Census and loan data from 2012 was analyzed using the census tract and MA revisions resulting from the 2010 Census.

We also reviewed Bank Mutual's data and activities from 2008, 2009, 2010, 2011, and 2012 for the investment and service tests.

Data Integrity

Prior to conducting this examination, we conducted a data integrity review and tested the accuracy of Bank Mutual's HMDA and small business loan data for 2008, 2009, 2010, and 2011. The institution's HMDA data was determined to be accurate and appropriate for use in our evaluation of home mortgage lending. Bank Mutual's small business lending data initially contained numerous reporting errors, and it was initially determined the data would not be sufficiently reliable for use in our evaluation of the institution's small business lending performance. However, Bank Mutual corrected these errors, and we were ultimately able to determine the institution's small business lending data was also appropriate for use in our evaluation.

Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area where the bank has an office, a sample of assessment areas (AAs) within that state/multistate metropolitan area was selected for full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section (as applicable) for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating(s) and state ratings.

With regard to the review of Bank Mutual's CRA performance, the institution's performance in the state of Wisconsin was weighted more heavily than its performance in the Minneapolis-St. Paul-Bloomington multistate MSA. The vast majority of Bank Mutual's operations and activities occurred in Wisconsin; therefore, that state's rating was the determining force in the assignment of an overall CRA rating for the institution.

The state ratings and multistate metropolitan area rating(s) are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Fair Lending or Other Illegal Credit Practices Review

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

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

State Rating

State of Wisconsin

CRA Rating for Wisconsin¹:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Bank Mutual's HMDA lending among borrowers of different income levels reflects good distribution. Overall, the institution's lending percentages to low- and moderate-income borrowers were near to or equal to the comparable HMDA aggregate. Overall, Bank Mutual's geographic distribution of HMDA loans reflects adequate distribution throughout the assessment areas. However, its lending in low- and moderate-income census tracts in the Madison and Racine assessment areas needs to be improved. During the review period, the institution's overall HMDA lending percentages in these tracts were lower than the comparable HMDA aggregate.
- Bank Mutual's distribution of small business loans to small businesses is excellent. Throughout Bank Mutual's assessment areas, the institution's percentages for small business loans granted to small businesses exceeds the aggregate reporters. Bank Mutual's geographic distribution of small business loans reflects adequate distribution throughout the assessment areas.
- The institution's relatively high level of community development loans in the state of Wisconsin is good. During the review period, 16 of the 19 community development loans originated by Bank Mutual in its assessment areas were located in the state of Wisconsin, with most of the activity occurring in the Milwaukee-Waukesha-West Allis and the Madison MSAs. The institution has many innovative and flexible lending products available that are beneficial to low- and moderate-income borrowers and low- and moderate-income areas.
- The institution exhibits good responsiveness to credit and community economic development needs and has an adequate level of qualified community development investments, grants, and donations in the state of Wisconsin.
- Delivery systems are accessible to essentially all portions of the institution's assessment areas in the state of Wisconsin. Although Bank Mutual does not have any branches or ATMs in low-income areas, its percentage of branches and ATMs located in moderate-income areas exceeds the demographics of the institution's assessment areas within the state. The institution provides an overall relatively high level of community development services in the state's 12 assessment areas.

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Description of Institution's Operations in Wisconsin

Bank Mutual's state of Wisconsin assessment area consists of eight entire MSAs, portions of two MSAs, a portion of one metropolitan division (MD), and 11 entire counties and one partial county located in nonmetropolitan areas of Wisconsin. The entire MSAs included in the state of Wisconsin assessment area are Appleton, Eau Claire, Fond du Lac, Janesville, Milwaukee-Waukesha-West Allis, Oshkosh-Neenah, Racine, and Sheboygan. The two partial MSAs are Green Bay and Madison. The one partial MD is Kenosha. The nonmetropolitan areas consist of Barron, Dodge, Door, Dunn, Green Lake, Marinette, Polk, Sawyer, Shawano, Washburn, and Waupaca Counties, and four tracts in Manitowoc County.

As of June 30, 2012, the institution held a 1.79 percent deposit market share (\$2.8 billion) within the state of Wisconsin assessment area (ranking Bank Mutual 7th of 196 financial institutions in the assessment area). Of Bank Mutual's 76 branches and 67 ATMs, 73 branches and 64 ATMs are located in the state of Wisconsin assessment area. A substantial majority of Bank Mutual's HMDA lending is located in the state of Wisconsin. During the review period, 94.5 percent of the number and 92.6 percent of the dollar amount of the institution's HMDA lending activity during the review period was conducted in Bank Mutual's 12 Wisconsin assessment areas. In addition, a substantial majority of Bank Mutual's small business lending also occurred in the state of Wisconsin. During the review period, 94.9 percent of the number and 98.1 percent of the dollar amount of the institution's small business lending was located in the state's 12 assessment areas.

Refer to the market profiles for the state of Wisconsin in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Wisconsin

For each individual assessment area within Bank Mutual's overall state of Wisconsin assessment area, we conducted either full-scope or limited-scope reviews. While both reviews take into consideration the institution's Lending, Services, and Investments performance, the full-scope reviews are more in-depth with analysis based on the overall context of the institution's full performance within each area and test (Lending, Services, Investments); limited-scope reviews are less in-depth and the analysis is based on comparable demographics within each area and test. As a result, the institution's state and overall ratings are based primarily on the results of those areas that receive full-scope reviews.

The areas that received full-scope reviews within Bank Mutual's state of Wisconsin assessment area are: the Appleton, WI MSA; Eau Claire, WI MSA; a portion of the Green Bay, WI MSA (Brown County); a portion of the Madison, WI MSA (Columbia and Dane Counties); Milwaukee-Waukesha-West Allis, WI MSA; Racine, WI MSA; and all of the institution's nonmetropolitan assessment areas combined and reviewed as one (consisting of all of Barron, Dodge, Door, Dunn, Green Lake, Marinette, Polk, Sawyer, Shawano, Washburn, and Waupaca Counties, and a portion of Manitowoc County) assessment areas.

The areas that received limited-scope reviews within Bank Mutual's state of Wisconsin assessment area are: the Fond Du Lac, WI MSA; Janesville, WI MSA; a portion of the Lake County-Kenosha County, IL-WI MD (Kenosha County); Oshkosh-Neenah, WI MSA; and Sheboygan, WI MSA assessment areas. Refer to the table in appendix A for more information regarding full-scope and limited-scope reviews.

With regard to the full-scope reviews of the institution's CRA performance in the state of Wisconsin, Bank Mutual's performance in the Milwaukee-Waukesha-West Allis MSA was weighted the most due to the institution's high levels of lending and services in this area compared to the other areas. Bank Mutual's CRA performance in the Green Bay, Eau Claire, and Wisconsin nonmetropolitan assessment areas was also weighted heavily due to the lending volume in these areas. The institution's performance in the remaining three state of Wisconsin full-scope assessment areas received less weight because of the smaller amounts of lending and services in these areas. The state's five limited-scope review assessment areas received the least weight and consideration.

During our full-scope reviews, we reached out to one community contact within each of Bank Mutual's assessment areas receiving a full-scope review. Each contact represented a community and/or economic development organization or government agency/department and provided information related to each area's community development needs as well as possible ways institutions could meet those needs.

LENDING TEST

Bank Mutual's overall performance under the lending test in the state of Wisconsin is rated "High Satisfactory."

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, Bank Mutual's performance in the Appleton, Green Bay, and Milwaukee-Waukesha-West Allis MSA assessment areas is good. In the Eau Claire, Madison, and Racine MSA assessment areas and the state of Wisconsin nonmetropolitan areas assessment area, the institution's performance is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Wisconsin section of appendix D for the facts and data used to evaluate the bank's lending activity.

The institution's lending levels in the seven state of Wisconsin full-scope review assessment areas reflect good responsiveness to the overall credit needs of Bank Mutual's state of Wisconsin assessment area. During the review period, 94.1 percent of the number and 95.4 percent of the dollar amount of the institution's state of Wisconsin HMDA lending activity during the review period was conducted in Bank Mutual's seven Wisconsin full scope-review assessment areas. In addition, 93.2 percent of the number and 93.8 percent of the dollar amount of the institution's state of Wisconsin small business lending was located in the state's seven full-scope review assessment areas. All 16 of the institution's community development loans originated in the state of Wisconsin were located in the state's seven full-scope review assessment areas. Many of Bank Mutual's innovative and flexible lending products that are available to low- and moderate-income individuals and families, and in low- and moderate-income areas, are originated in these seven assessment areas.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to tables 2, 3, 4, and 5 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/purchases.

Home Purchase Loans

Overall, Bank Mutual's geographic distribution of HMDA reportable Home Purchase loans reflects adequate distribution throughout the full-scope review assessment areas located in the state of Wisconsin. However, distribution to low-income areas in the institution's Madison MSA assessment area needs to improve.

During the review period, the institution originated 2,495 HMDA reportable Home Purchase loans in its Wisconsin assessment area. Of this amount, 92.9 percent were originated in the seven full scope review assessment areas within the Wisconsin assessment area.

Based on full-scope reviews, Bank Mutual's distribution of Home Purchase loans in low- and moderate-income areas in the Eau Claire, Milwaukee-Waukesha-West Allis, and Racine MSA assessment areas and the state of Wisconsin nonmetropolitan assessment areas is near to or equal to the aggregate reporters and reflects good distribution throughout these assessment areas. In the Appleton, Green Bay, and Madison MSA assessment areas, the institution's distribution in low- and moderate-income areas reflects adequate distribution throughout these assessment areas.

During the review period, 377 Home Purchase loans were originated in the Eau Claire MSA assessment area. In 2008, 2009, 2010, and 2011, 9.9 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 11.9 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 11.2 percent of its Home Purchase loans in moderate-income areas located in the Eau Claire assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 10.5 percent. In 2012, 10.4 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 8.9 percent for the aggregate in 2011.

Bank Mutual originated 830 Home Purchase loans in the Milwaukee-Waukesha-West Allis MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 16.6 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 19.6 percent. On average, in 2008 through 2011, Bank Mutual originated 12.4 percent of its Home Purchase loans in low- and moderate-income areas located in the Milwaukee-Waukesha-West Allis assessment area. The average distribution in low- and moderate-income areas for the aggregate during the same period was 12.7 percent. In 2012, 17.7 percent of the Home Purchase loans originated by the institution in this assessment area were in low- or moderate-income tracts, compared to 10.2 percent for aggregate reporters in 2011.

The institution originated 97 Home Purchase loans in the Racine MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 10 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 13 percent. On average, in 2008 through 2011, Bank Mutual originated 10.8 percent of its Home Purchase loans in low- and moderate-income areas located in the Racine assessment area. The average distribution in low- and moderate-income areas for the aggregate during the same period was 7.8 percent. In 2012, 13.3 percent

of the Home Purchase loans originated by the institution in this assessment area were in low- or moderate-income areas, compared to 6.6 percent in 2011 for aggregate reporters in the assessment area.

During the review period, 373 Home Purchase loans were originated in the Wisconsin nonmetropolitan assessment areas. In 2008, 2009, 2010, and 2011, 2.2 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 10.1 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 1.3 percent of its Home Purchase loans in moderate-income areas located in the nonmetropolitan assessment areas. The average distribution in moderate-income areas for the aggregate during the same period was 1.5 percent. In 2012, 13.8 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 0.9 percent for the aggregate in 2011.

During the review period, 106 Home Purchase loans were originated in the Appleton MSA assessment area. In 2008, 2009, 2010, and 2011, 4.7 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 6.2 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 4.7 percent of its Home Purchase loans in moderate-income areas located in the Appleton assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 5.5 percent. In 2012, 32.1 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 4.8 percent in moderate-income tracts for the aggregate in 2011.

Bank Mutual originated 434 Home Purchase loans in the Green Bay MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 9.6 percent of the owner occupied housing units in the assessment area were located in moderate-income areas (zero low-income tracts); in 2012 the amount of owner occupied housing units in low- or moderate-income tracts was 16.9 percent. On average, in 2008 through 2011, Bank Mutual originated 6.5 percent of its Home Purchase loans in moderate-income areas located in the Green Bay assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 8.1 percent. In 2012, 14.9 percent of the Home Purchase loans originated by the institution in this assessment area were in low- or moderate-income tracts, compared to 6.5 percent in moderate-income areas for aggregate reporters in 2011.

The institution originated 102 Home Purchase loans in the Madison MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 14.8 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 13.6 percent. On average, in 2008 through 2011, Bank Mutual originated 11.1 percent of its Home Purchase loans in moderate-income areas located in the Madison assessment area (zero loans in low-income tracts). The average distribution in low- and moderate-income areas for the aggregate during the same period was 0.6 percent and 11 percent respectively. In 2012, 9.5 percent of the Home Purchase loans originated by the institution in this assessment area were in moderate-income areas (zero loans in low-income tracts). In 2011, aggregate reporters in the assessment area originated 10.7 percent of their Home Purchase loans in low- to moderate-income areas (loans in low-income areas making up less than one percent of this distribution).

Home Improvement Loans

Overall, Bank Mutual's geographic distribution of HMDA reportable Home Improvement loans reflects adequate distribution throughout the full-scope review assessment areas located in the state of Wisconsin.

During the review period, the institution originated 1,526 HMDA reportable Home Improvement loans in its Wisconsin assessment area. Of this amount, 95.7 percent were originated in the seven full scope review assessment areas in the Wisconsin assessment area.

Based on full-scope reviews, Bank Mutual's distribution of Home Improvement loans in low- and moderate-income areas in the Milwaukee-Waukesha-West Allis and Racine MSA assessment areas exceeds the aggregate reporters and reflects excellent distribution throughout these assessment areas. In the Madison MSA assessment area and the state of Wisconsin nonmetropolitan assessment areas, Bank Mutual's distribution in low- and moderate-income areas is near to or equal to the aggregate reporters and reflects good distribution throughout these assessment areas. In the Appleton, Eau Claire, and Green Bay MSA assessment areas, the institution's distribution in low- and moderate-income areas is lower than the aggregate reporters and reflects weak distribution throughout these assessment areas. However, Bank Mutual's distribution in low- and moderate income tracts in 2012 in these assessment areas reflected improved distribution.

Bank Mutual originated 295 Home Improvement loans in the Milwaukee-Waukesha-West Allis MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 16.6 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 19.6 percent. On average, in 2008 through 2011, Bank Mutual originated 16.2 percent of its Home Improvement loans in low- and moderate-income areas located in the Milwaukee-Waukesha-West Allis assessment area. The average distribution in low- and moderate-income areas for the aggregate during the same period was 12.7 percent. In 2012, 15.8 percent of the Home Improvement loans originated by the institution in this assessment area were in low- or moderate-income tracts, compared to 11.9 percent for the aggregate in 2011.

The institution originated 35 Home Purchase loans in the Racine MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 10 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 13 percent. On average, in 2008 through 2011, Bank Mutual originated 15.1 percent of its Home Improvement loans in low- and moderate-income areas located in the Racine assessment area. The average distribution in low- and moderate-income areas for the aggregate during the same period was 7.3 percent. In 2012, zero Home Improvement loans originated by the institution in this assessment area were in low- or moderate-income areas, compared to 6.8 percent in 2011 by aggregate reporters.

The institution originated 37 Home Improvement loans in the Madison MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 14.8 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 13.6 percent. On average, in 2008 through 2011, Bank Mutual originated 17.5 percent of its Home Improvement loans in moderate-income areas located in the Madison assessment area (zero loans in low-income tracts). The average distribution in low- and moderate-income areas for the aggregate during the same period was 0.3 percent and 11.9 percent respectively. In 2012, 30 percent of the Home Improvement loans originated by the institution in this assessment area were in moderate-income areas (zero loans in low-income tracts). In 2011, aggregate reporters in the assessment area originated 10.9 percent of their

Home Improvement loans in low- and moderate-income areas (less than one percent in low-income tracts).

During the review period, 444 Home Improvement loans were originated in the Wisconsin nonmetropolitan assessment areas. In 2008, 2009, 2010, and 2011, 2.2 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 10.1 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 1.4 percent of its Home Improvement loans in moderate-income areas located in the nonmetropolitan assessment areas. The average distribution in moderate-income areas for the aggregate during the same period was 1.9 percent. In 2012, 17.2 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 1.3 percent for aggregate reporters in 2011.

During the review period, 102 Home Improvement loans were originated in the Appleton MSA assessment area. In 2008, 2009, 2010, and 2011, 4.7 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 6.2 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated zero Home Improvement loans in moderate-income areas located in the Appleton assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 4.8 percent. In 2012, 8.3 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 2.9 percent by the aggregate in 2011.

During the review period, 303 Home Improvement loans were originated in the Eau Claire MSA assessment area. In 2008, 2009, 2010, and 2011, 9.9 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 11.9 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 5.3 percent of its Home Improvement loans in moderate-income areas located in the Eau Claire assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 9.7 percent. In 2012, 7.5 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 9.9 percent by aggregate reporters in the assessment area in 2011.

Bank Mutual originated 244 Home Improvement loans in the Green Bay MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 9.6 percent of the owner occupied housing units in the assessment area were located in moderate-income areas (zero low-income tracts); in 2012 the amount of owner occupied housing units in low- or moderate-income tracts was 16.9 percent. On average, in 2008 through 2011, Bank Mutual originated 2.8 percent of its Home Improvement loans in moderate-income areas located in the Green Bay assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 6.1 percent. In 2012, 16.6 percent of the Home Improvement loans originated by the institution in this assessment area were in low- or moderate-income tracts, compared to 4.1 percent by aggregate reporters in 2011.

Home Mortgage Refinance Loans

Overall, Bank Mutual's geographic distribution of HMDA reportable Home Mortgage Refinance loans reflects good distribution throughout the full-scope review assessment areas located in the state of Wisconsin.

During the review period, the institution originated 12,004 HMDA reportable Home Mortgage Refinance loans in its Wisconsin assessment area. Of this amount, 94.3 percent were originated in the seven full-scope review assessment areas in the Wisconsin assessment area.

Based on full-scope reviews, Bank Mutual's distribution of Home Mortgage Refinance loans in low- and moderate-income areas in the Eau Claire, Green Bay, Madison, Milwaukee-Waukesha-West Allis MSA assessment areas, and the state of Wisconsin nonmetropolitan assessment areas is near to or equal to the aggregate reporters and reflects good distribution throughout these assessment areas. In the Racine MSA assessment area, Bank Mutual's distribution in low- and moderate-income areas is somewhat lower than the aggregate reporters and reflects adequate distribution throughout the assessment area. In the Appleton MSA assessment area, the institution's distribution in low- and moderate-income areas is lower than the aggregate reporters and reflects weak distribution throughout this assessment area. However, Bank Mutual's distribution in low- and moderate income tracts in 2012 in the Appleton assessment area reflected improved distribution.

During the review period, 1,561 Home Mortgage Refinance loans were originated in the Eau Claire MSA assessment area. In 2008, 2009, 2010, and 2011, 9.9 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 11.9 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 7.3 percent of its Home Mortgage Refinance loans in moderate-income areas located in the Eau Claire assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 8.4 percent. In 2012, 7.1 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 8.2 percent by aggregate reporters in the assessment area in 2011.

Bank Mutual originated 2,197 Home Mortgage Refinance loans in the Green Bay MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 9.6 percent of the owner occupied housing units in the assessment area were located in moderate-income areas (zero low-income tracts); in 2012 the amount of owner occupied housing units in low- or moderate-income tracts was 16.9 percent. On average, in 2008 through 2011, Bank Mutual originated 3.8 percent of its Home Mortgage Refinance loans in moderate-income areas located in the Green Bay assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 4.3 percent. In 2012, 11.1 percent of the Home Mortgage Refinance loans originated by the institution in this assessment area were in low- or moderate-income tracts, compared to 3.5 percent by the aggregate in 2011.

The institution originated 532 Home Mortgage Refinance loans in the Madison MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 14.8 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 13.6 percent. On average, in 2008 through 2011, Bank Mutual originated 18.7 percent of its Home Mortgage Refinance loans in moderate-income areas located in the Madison assessment area (zero loans in low-income tracts). The average distribution in low- and moderate-income areas for the aggregate during the same period was 0.4 percent and 9.3 percent respectively. In 2012, 12.5 percent of the Home Mortgage Refinance loans originated by the institution in this assessment area were in moderate-income areas (zero loans in low-income tracts). In 2011, aggregate reporters in the Madison MSA assessment

area originated 10 percent of their Home Mortgage Refinance loans in the area's low- or moderate-income tracts (less than one percent in low-income tracts).

Bank Mutual originated 3,592 Home Mortgage Refinance loans in the Milwaukee-Waukesha-West Allis MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 16.6 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 19.6 percent. On average, in 2008 through 2011, Bank Mutual originated 7.5 percent of its Home Mortgage Refinance loans in low- and moderate-income areas located in the Milwaukee-Waukesha-West Allis assessment area. The average distribution in low- and moderate-income areas for the aggregate during the same period was 8.3 percent. In 2012, 8.0 percent of the Home Mortgage Refinance loans originated by the institution in this assessment area were in low- or moderate-income tracts, compared to 5.7 percent by the aggregate in 2011.

During the review period, 2,480 Home Mortgage Refinance loans were originated in the Wisconsin nonmetropolitan assessment areas. In 2008, 2009, 2010, and 2011, 2.2 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 10.1 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 1.9 percent of its Home Mortgage Refinance loans in moderate-income areas located in the nonmetropolitan assessment areas. The average distribution in moderate-income areas for the aggregate during the same period was 1.7 percent. In 2012, 12.5 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 1.2 percent by aggregate reporters in the assessment area in 2011.

The institution originated 315 Home Mortgage Refinance loans in the Racine MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, 10 percent of the owner occupied housing units in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 13 percent. On average, in 2008 through 2011, Bank Mutual originated 3.6 percent of its Home Mortgage Refinance loans in low- and moderate-income areas located in the Racine assessment area. The average distribution in low- and moderate-income areas for the aggregate during the same period was 6.1 percent. In 2012, zero Home Mortgage Refinance loans originated by the institution in this assessment area were in low- or moderate-income areas. In 2011, aggregate reporters in the assessment area originated 5.5 percent of their Home Mortgage Refinance loans in the area's low- or moderate-income tracts.

During the review period, 642 Home Mortgage Refinance loans were originated in the Appleton MSA assessment area. In 2008, 2009, 2010, and 2011, 4.7 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 6.2 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 0.6 percent of its Home Mortgage Refinance Mortgage loans in moderate-income areas located in the Appleton assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 3.1 percent. In 2012, 17.6 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 2.9 percent for the aggregate in 2011.

Multifamily Loans

During the review period, the institution originated 99 HMDA reportable multifamily loans in its Wisconsin assessment area. Of this amount, 83 (83.8 percent) were originated in the seven full-scope review assessment areas in the Wisconsin assessment area. Multifamily loans represent less than 1 percent of the HMDA reportable loans originated in the seven full-scope review assessment areas; therefore, a geographical analysis would not be meaningful and was not conducted.

Small Loans to Businesses

Refer to table 6 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall, Bank Mutual's geographic distribution of Small Loans to Businesses reflects adequate distribution throughout the full-scope review assessment areas located in the state of Wisconsin.

During the review period, the institution originated 661 Small Loans to Businesses in its Wisconsin assessment area. Of this amount, 93.4 percent were originated in the seven full scope review assessment areas in the Wisconsin assessment area.

Based on full-scope reviews, Bank Mutual's distribution of Small Loans to Businesses in low- and moderate-income areas in the Green Bay MSA assessment area exceeds the aggregate reporters and reflects excellent distribution throughout the assessment area. In the Milwaukee-Waukesha-West Allis MSA assessment area, the institution's distribution in low- and moderate-income areas reflects adequate distribution throughout this assessment area. Bank Mutual's distribution of Small Loans to Businesses in low- and moderate-income areas in the Eau Claire MSA assessment area and the state of Wisconsin nonmetropolitan assessment areas was lower than the aggregate reporters and reflects weak distribution in these assessment areas. However, Bank Mutual's distribution in low- and moderate-income tracts in 2012 in these assessment areas reflected improved distribution. The institution did not originate enough Small Loans to Businesses in the Appleton, Madison, and Racine MSA assessment areas for a meaningful geographical analysis to be conducted.

Bank Mutual originated 118 Small Loans to Businesses in the Green Bay MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, an average of 14.9 percent of the businesses in the assessment area were located in moderate-income areas (zero low-income tracts); in 2012 the amount of businesses in low- or moderate-income tracts was 18.4 percent. On average, in 2008 through 2011, Bank Mutual originated 24.4 percent of its Small Loans to Businesses in moderate-income areas located in the Green Bay assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 14.2 percent. In 2012, 26.4 percent of the Small Loans to Businesses originated by the institution in this assessment area were in low- or moderate-income tracts, compared to 15.4 percent for the aggregate in 2011.

Bank Mutual originated 263 Small Loans to Businesses in the Milwaukee-Waukesha-West Allis MSA assessment area during the review period. In 2008, 2009, 2010, and 2011, an average of 21.2 percent of the businesses in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 24 percent. On average, in 2008 through 2011, Bank Mutual originated 9 percent of its Small Loans to Businesses in low- and moderate-income areas located in the Milwaukee-Waukesha-West Allis assessment area. The average distribution in low- and moderate-income areas for the aggregate during the same period was 14.4 percent. In 2012, 23.6 percent of the Small Loans to

Businesses originated by the institution in this assessment area were in low- or moderate-income tracts, compared to the aggregate's 14.7 percent in 2011.

During the review period, 64 Small Loans to Businesses were originated in the Eau Claire MSA assessment area. In 2008, 2009, 2010, and 2011, an average of 18.8 percent of the businesses in the assessment area were located in moderate-income areas; in 2012 the amount was 14.9 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 3.9 percent of its Small Loans to Businesses in moderate-income areas located in the Eau Claire assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 19.6 percent. In 2012, 25 percent of the Small Loans to Businesses originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 19.5 percent in 2011 for the aggregate.

During the review period, 121 Small Loans to Businesses were originated in the Wisconsin nonmetropolitan assessment areas. In 2008, 2009, 2010, and 2011, an average of 1.8 percent of the businesses in the assessment area were located in moderate-income areas; in 2012 the amount was 9.7 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated zero of its Small Loans to Businesses in moderate-income areas located in the nonmetropolitan assessment areas. The average distribution in moderate-income areas for the aggregate during the same period was 1.6 percent. In 2012, 11.8 percent of the Small Loans to Businesses originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to the aggregate reporters' 1.1 percent in 2011.

During the review period, 26 Small Loans to Businesses were originated in the Appleton MSA assessment area; of which, five (19.2 percent) were located in moderate-income tracts. In 2008, 2009, 2010, and 2011, an average of 8.2 percent of the businesses in the assessment area were located in moderate-income areas; in 2012 the amount was 11.2 percent. The assessment area contained zero low-income census tracts during the review period. On average, the distribution of Small Loans to Businesses in moderate-income areas by aggregate reporters in 2008 through 2011 was 8.4 percent, compared to 7.9 percent by the aggregate in 2011.

The institution originated 16 Small Loans to Businesses in the Madison MSA assessment area during the review period; of which, four (25 percent) were located in low- or moderate-income tracts. In 2008, 2009, 2010, and 2011, an average of 8.2 percent of the businesses in the assessment area were located in low- or moderate-income areas; in 2012 the amount was 11.2 percent. On average, the distribution of Small Loans to Businesses in low- or moderate-income areas by aggregate reporters in 2008 through 2011 was 8.4 percent, compared to 17 percent by the aggregate in 2011.

Bank Mutual originated 12 Small Loans to Businesses in the Racine MSA assessment area during the review period; of which, three (25 percent) were located in low- or moderate-income tracts. In 2008, 2009, 2010, and 2011, an average of 16.1 percent of the businesses in the assessment area were located in low- or moderate-income areas; in 2012 the amount was also 16.1 percent. On average, the distribution of Small Loans to Businesses located in low- or moderate-income areas by aggregate reporters in 2008 through 2011 was 14.4 percent, compared to the aggregate's 14.8 percent in 2011.

Small Loans to Farms

The institution did not conduct Farm Lending during the review period.

Lending Gap Analysis

A Lending Gap Analysis was not required as no conspicuous gaps were noted in any of the full-scope review assessment areas located within the state of Wisconsin assessment area.

Inside/Outside Ratio

Our review included an analysis of Bank Mutual's distribution of HMDA reportable and Small Business loans originated within its assessment areas compared to similar loans originated by the institution outside of its assessment areas. This analysis was conducted at the institution level (inclusive of all loans originated in all of Bank Mutual's assessment areas combined) as opposed to each assessment area individually. The findings from the Inside/Outside Ratio analysis were favorably factored into the overall analysis of Bank Mutual's distribution of lending by income level of geography.

A high percentage of loans are made in the institution's assessment areas. During the review period, Bank Mutual originated a total of 18,836 HMDA reportable loans totaling \$2.7 billion. Of this amount, 17,162 or 91.1 percent of the total number of HMDA loans and \$2.4 billion or 88.9 percent of the total dollar amount of HMDA loans were secured by properties located inside the assessment areas. Additionally, the institution granted 728 small business loans totaling \$130.1 million during the review period. Of this amount, 698 or 95.9 percent of the total number and \$124.5 million or 95.7 percent of the total dollar amount of small business loans were located in the assessment areas.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to tables 8, 9 and 10 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.

Home Purchase Loans

Overall, Bank Mutual's distribution of HMDA reportable Home Purchase loans to low- and moderate-income borrowers is near to or equal to aggregate reporters and reflects good proportions throughout the full-scope review assessment areas located in the state of Wisconsin.

Based on full-scope reviews, Bank Mutual's distribution of Home Purchase loans to low- and moderate-income borrowers in the Appleton, Eau Claire, Madison, and Milwaukee-Waukesha-West Allis MSA assessment areas exceeds the aggregate reporters and reflects excellent proportions throughout these assessment areas. In the Racine MSA assessment area, the institution's distribution to low- and moderate-income borrowers is near to or equal to the aggregate and reflects good distribution throughout this assessment area. Bank Mutual's distribution of Home Purchase loans to low- and moderate-income borrowers in the Green Bay MSA assessment area and the state of Wisconsin nonmetropolitan assessment areas is somewhat lower than the aggregate reporters and reflects adequate proportions.

In 2008, 2009, 2010, and 2011, 33.9 percent of the families residing in the Appleton assessment area were identified as low- or moderate-income; in 2012 the amount was 35.7 percent. On average, in 2008 through 2011, Bank Mutual originated 55 percent of its Home Purchase loans to low- or moderate-income borrowers located in the Appleton assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 48.5 percent. In 2012, 53.6 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to 50 percent by the aggregate in 2011.

In 2008, 2009, 2010, and 2011, 36.5 percent of the families living in the Eau Claire assessment area were considered low- or moderate-income; in 2012 the amount was 38.1 percent. On average, in 2008 through 2011, Bank Mutual originated 47.7 percent of its Home Purchase loans to low- or moderate-income borrowers living in the Eau Claire assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 41.8 percent. In 2012, 51.9 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to the aggregate's 41.7 percent in 2011.

During 2008, 2009, 2010, and 2011, 34.7 percent of the families living in the Madison assessment area were identified as low- or moderate-income; in 2012 the amount was 36.4 percent. On average, in 2008 through 2011, Bank Mutual originated 45.7 percent of its Home Purchase loans to low- or moderate-income borrowers located in the Madison assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 38.8 percent. In 2012, 38.1 percent of the Home Purchase loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to 38.3 percent for the aggregate in 2011.

In 2008, 2009, 2010, and 2011, 37.7 percent of the families living in the Milwaukee-Waukesha-West Allis assessment area were identified as low- or moderate-income; in 2012 the amount was 39.1 percent. On average, in 2008 through 2011, Bank Mutual originated 39.4 percent of its Home Purchase loans to low- and moderate-income borrowers located in the Milwaukee-Waukesha-West Allis assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 36.6 percent. In 2012, 39 percent of the Home Purchase loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to the aggregate's 37.6 percent in 2011.

During 2008, 2009, 2010, and 2011, 36.3 percent of the families residing in the Racine assessment area were considered low- or moderate-income; in 2012 the amount was 37.6 percent. On average, in 2008 through 2011, Bank Mutual originated 41.8 percent of its Home Purchase loans to low- and moderate-income borrowers located in the Racine assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 42.8 percent. In 2012, 40 percent of the Home Purchase loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to 42.7 percent for the aggregate in 2011.

During 2008, 2009, 2010, and 2011, 33.7 percent of the families residing in the Green Bay assessment area were considered low- or moderate-income; in 2012 the amount was 36.3 percent. On average, in 2008 through 2011, Bank Mutual originated 37.2 percent of its Home Purchase loans to low- or moderate-income borrowers located in the Green Bay assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 44.5 percent. In 2012, 45.7 percent of the Home Purchase loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to 43.6 percent for the aggregate in 2011.

In 2008, 2009, 2010, and 2011, 35.3 percent of the families living in the state of Wisconsin nonmetropolitan assessment areas were identified as low- or moderate-income; in 2012 the amount was 37.6 percent. On average, in 2008 through 2011, Bank Mutual originated 30.7 percent of its Home Purchase loans to low- or moderate-income borrowers located in the nonmetropolitan assessment areas. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 35.6 percent. In 2012, 38 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were to low- and moderate-income borrowers, compared to 36.8 percent by the aggregate reporters in 2011.

Home Improvement Loans

Overall, Bank Mutual's distribution of HMDA reportable Home Improvement loans to low- and moderate-income borrowers is near to or equal to aggregate reporters and reflects good proportions throughout the full-scope review assessment areas located in the state of Wisconsin.

Based on full-scope reviews, Bank Mutual's distribution of Home Improvement loans to low- and moderate-income borrowers in the Appleton and Racine MSA assessment areas exceeds the aggregate reporters and reflects excellent proportions throughout these assessment areas. In the Milwaukee-Waukesha-West Allis MSA assessment area, the institution's distribution to low- and moderate-income borrowers is near to or equal to the aggregate and reflects good distribution throughout this assessment area. Bank Mutual's distribution of Home Improvement loans to low- and moderate-income borrowers in the Eau Claire, Green Bay MSA assessment areas and the state of Wisconsin nonmetropolitan assessment areas is somewhat lower than the aggregate reporters and reflects adequate proportions. The institution's distribution to low- and moderate-income borrowers in the Madison MSA assessment area is lower than the aggregate and reflects weak proportions. However, Bank Mutual's distribution to low- and moderate-income borrowers in 2012 in this assessment area reflected improved proportions.

In 2008, 2009, 2010, and 2011, 33.9 percent of the families residing in the Appleton assessment area were identified as low- or moderate-income; in 2012 the amount was 35.7 percent. On average, in 2008 through 2011, Bank Mutual originated 36.8 percent of its Home Improvement loans to low- or moderate-income borrowers located in the Appleton assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 32.4 percent. In 2012, 33.3 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to the aggregate's 35 percent in 2011.

During 2008, 2009, 2010, and 2011, 36.3 percent of the families residing in the Racine assessment area were considered low- or moderate-income; in 2012 the amount was 37.6 percent. On average, in 2008 through 2011, Bank Mutual originated 44.6 percent of its Home Improvement loans to low- and moderate-income borrowers located in the Racine assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 33.8 percent. In 2012, 71.4 percent of the Home Improvement loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to 33.3 percent by the aggregate in 2011.

In 2008, 2009, 2010, and 2011, 37.7 percent of the families living in the Milwaukee-Waukesha-West Allis assessment area were identified as low- or moderate-income; in 2012 the amount was 39.1 percent. On average, in 2008 through 2011, Bank Mutual originated 30.2 percent of its Home Improvement loans to low- and moderate-income borrowers located in the Milwaukee-Waukesha-West Allis assessment

area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 30.3 percent. In 2012, 44.6 percent of the Home Improvement loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to 30 percent in 2011 by the aggregate.

In 2008, 2009, 2010, and 2011, 36.5 percent of the families living in the Eau Claire assessment area were considered low- or moderate-income; in 2012 the amount was 38.1 percent. On average, in 2008 through 2011, Bank Mutual originated 25.2 percent of its Home Improvement loans to low- or moderate-income borrowers living in the Eau Claire assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 31.3 percent. In 2012, 20.2 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to 35.5 percent by aggregate reporters in 2011.

During 2008, 2009, 2010, and 2011, 33.7 percent of the families residing in the Green Bay assessment area were considered low- or moderate-income; in 2012 the amount was 36.3 percent. On average, in 2008 through 2011, Bank Mutual originated 24.5 percent of its Home Improvement loans to low- or moderate-income borrowers located in the Green Bay assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 30.1 percent. In 2012, 37.2 percent of the Home Improvement loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to the aggregate's 31.9 percent in 2011.

In 2008, 2009, 2010, and 2011, 35.3 percent of the families living in the state of Wisconsin nonmetropolitan assessment areas were identified as low- or moderate-income; in 2012 the amount was 37.6 percent. On average, in 2008 through 2011, Bank Mutual originated 24.5 percent of its Home Improvement loans to low- or moderate-income borrowers located in the nonmetropolitan assessment areas. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 30.4 percent. In 2012, 31.9 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were to low- and moderate-income borrowers, compared to 28.3 percent by aggregate reporters in 2011.

During 2008, 2009, 2010, and 2011, 34.7 percent of the families living in the Madison assessment area were identified as low- or moderate-income; in 2012 the amount was 36.4 percent. On average, in 2008 through 2011, Bank Mutual originated 19.1 percent of its Home Improvement loans to low- or moderate-income borrowers located in the Madison assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 31.8 percent. In 2012, 40 percent of the Home Improvement loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to the aggregate's 30.6 percent in 2011.

Home Mortgage Refinance Loans

Overall, Bank Mutual's distribution of HMDA reportable Home Mortgage Refinance loans to low- and moderate-income borrowers is near to or equal to aggregate reporters and reflects good proportions throughout the full-scope review assessment areas located in the state of Wisconsin.

Based on full-scope reviews, Bank Mutual's distribution of Home Mortgage Refinance loans to low- and moderate-income borrowers in the Appleton and Milwaukee-Waukesha-West Allis MSA assessment areas exceeds the aggregate reporters and reflects excellent proportions throughout these assessment areas. In the Eau Claire, Green Bay, Madison, and Racine MSA assessment areas, and the

state of Wisconsin nonmetropolitan assessment areas the institution's distribution to low- and moderate-income borrowers is near to or equal to the aggregate and reflects good proportions throughout the assessment areas.

In 2008, 2009, 2010, and 2011, 33.9 percent of the families residing in the Appleton assessment area were identified as low- or moderate-income; in 2012 the amount was 35.7 percent. On average, in 2008 through 2011, Bank Mutual originated 41 percent of its Home Mortgage Refinance loans to low- or moderate-income borrowers located in the Appleton assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 30.5 percent. In 2012, 36.1 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to 31.7 percent by the aggregate in 2011.

In 2008, 2009, 2010, and 2011, 37.7 percent of the families living in the Milwaukee-Waukesha-West Allis assessment area were identified as low- or moderate-income; in 2012 the amount was 39.1 percent. On average, in 2008 through 2011, Bank Mutual originated 25.2 percent of its Home Mortgage Refinance loans to low- and moderate-income borrowers located in the Milwaukee-Waukesha-West Allis assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 22.8 percent. In 2012, 26.8 percent of the Home Mortgage Refinance loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to the aggregate's 22.4 percent in 2011.

In 2008, 2009, 2010, and 2011, 36.5 percent of the families living in the Eau Claire assessment area were considered low- or moderate-income; in 2012 the amount was 38.1 percent. On average, in 2008 through 2011, Bank Mutual originated 26.9 percent of its Home Mortgage Refinance loans to low- or moderate-income borrowers living in the Eau Claire assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 27.8 percent. In 2012, 25.9 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to 28.3 percent by aggregate reporters in 2011.

During 2008, 2009, 2010, and 2011, 33.7 percent of the families residing in the Green Bay assessment area were considered low- or moderate-income; in 2012 the amount was 36.3 percent. On average, in 2008 through 2011, Bank Mutual originated 28.3 percent of its Home Mortgage Refinance loans to low- or moderate-income borrowers located in the Green Bay assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 27 percent. In 2012, 31.5 percent of the Home Mortgage Refinance loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to 28.3 percent for the aggregate in 2011.

During 2008, 2009, 2010, and 2011, 34.7 percent of the families living in the Madison assessment area were identified as low- or moderate-income; in 2012 the amount was 36.4 percent. On average, in 2008 through 2011, Bank Mutual originated 28.5 percent of its Home Mortgage Refinance loans to low- or moderate-income borrowers located in the Madison assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 28 percent. In 2012, 38.4 percent of the Home Mortgage Refinance loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to the aggregate's 27.9 percent in 2011.

During 2008, 2009, 2010, and 2011, 36.3 percent of the families residing in the Racine assessment area were considered low- or moderate-income; in 2012 the amount was 37.6 percent. On average, in 2008 through 2011, Bank Mutual originated 26.8 percent of its Home Mortgage Refinance loans to low- and

moderate-income borrowers located in the Racine assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 28 percent. In 2012, 29.3 percent of the Home Mortgage Refinance loans originated by the institution in this assessment area were to low- or moderate-income borrowers, compared to 27.7 percent for aggregate reporters in 2011.

In 2008, 2009, 2010, and 2011, 35.3 percent of the families living in the state of Wisconsin nonmetropolitan assessment areas were identified as low- or moderate-income; in 2012 the amount was 37.6 percent. On average, in 2008 through 2011, Bank Mutual originated 25.5 percent of its Home Mortgage Refinance loans to low- or moderate-income borrowers located in the nonmetropolitan assessment areas. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 23.8 percent. In 2012, 25.2 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were to low- and moderate-income borrowers, compared to 23.4 percent for the aggregate in 2011.

Small Loans to Businesses

Refer to table 11 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Overall, the institution's distribution of small business loans to business customers of different sizes (including small businesses with revenues of \$1 million or less) within each of the state of Wisconsin full-scope review assessment areas reflects excellent proportions and exceeds aggregate reporters. Bank Mutual's distribution of small business loans to small business customers is somewhat lower than the percentage of small businesses in each of the full-scope review assessment areas, reflecting adequate proportions.

During the review period, Bank Mutual originated 26 Small Loans to Businesses in the Appleton assessment area – 13 were under \$100,000; seven were between \$100,000 and less than \$250,000; and six were between \$250,000 and \$1 million. Small businesses in the assessment area received 78.6 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate during the same period was 34.4 percent. In 2012, 50 percent of the Small Loans to Businesses originated by the institution were to small businesses in the assessment area, compared to 42.6 percent by the aggregate in 2011. In 2008, 2009, 2010, and 2011 an average of 69.2 percent of businesses in the assessment area were small businesses; in 2012 the amount was 74.2 percent.

The institution originated 64 Small Loans to Businesses in the Eau Claire assessment area during the review period – 34 were under \$100,000; 21 were between \$100,000 and less than \$250,000; and nine were between \$250,000 and \$1 million. Small businesses in the assessment area received 90 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate during the same period was 35.9 percent. In 2012, 66.7 percent of the Small Loans to Businesses originated by the institution were to small businesses in the assessment area, compared to the aggregate's 43.1 percent in 2011. In 2008, 2009, 2010, and 2011 an average of 69.9 percent of businesses in the assessment area were small businesses; in 2012 the amount was 75.4 percent.

Bank Mutual originated 118 Small Loans to Businesses in the Green Bay assessment area during the review period – 70 were under \$100,000; 32 were between \$100,000 and less than \$250,000; and 16 were between \$250,000 and \$1 million. Small businesses in the assessment area received 64.3 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate

during the same period was 35.9 percent. In 2012, 50 percent of the Small Loans to Businesses originated by the institution were to small businesses in the assessment area, compared to 44.6 percent by aggregate reporters in 2011. In 2008, 2009, 2010, and 2011 an average of 69.2 percent of businesses in the assessment area were small businesses; in 2012 the amount was 71.2 percent.

The institution originated 16 Small Loans to Businesses in the Madison assessment area during the review period – 14 were under \$100,000; one was between \$100,000 and less than \$250,000; and one was between \$250,000 and \$1 million. Small businesses in the assessment area received 50 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate during the same period was 35.6 percent. In 2012, 62.5 percent of the Small Loans to Businesses originated by the institution were to small businesses in the assessment area, compared to 43.6 percent in 2011 for the aggregate. In 2008, 2009, 2010, and 2011 an average of 69.8 percent of businesses in the assessment area were small businesses; in 2012 the amount was 70.2 percent.

During the review period, the institution originated 263 Small Loans to Businesses in the Milwaukee-Waukesha-West Allis assessment area – 101 were under \$100,000; 81 were between \$100,000 and less than \$250,000; and 81 were between \$250,000 and \$1 million. Small businesses in the assessment area received 49.3 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate during the same period was 34.6 percent. In 2012, 45.5 percent of the Small Loans to Businesses originated by the institution were to small businesses in the assessment area, compared to aggregate reporters' 42.4 percent in 2011. In 2008, 2009, 2010, and 2011 an average of 69.9 percent of businesses in the assessment area were small businesses; in 2012 the amount was 70.6 percent.

During the review period, Bank Mutual originated 12 Small Loans to Businesses in the Racine assessment area – eight were under \$100,000; two were between \$100,000 and less than \$250,000; and two were between \$250,000 and \$1 million. Small businesses in the assessment area received 77.8 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate during the same period was 36.9 percent. In 2012, 100 percent of the Small Loans to Businesses originated by the institution were to small businesses in the assessment area, compared to 44.7 percent for the aggregate in 2011. In 2008, 2009, 2010, and 2011 an average of 71.6 percent of businesses in the assessment area were small businesses; in 2012 the amount was 72.4 percent.

Bank Mutual originated 121 Small Loans to Businesses in the state of Wisconsin nonmetropolitan assessment areas during the review period – 62 were under \$100,000; 32 were between \$100,000 and less than \$250,000; and 27 were between \$250,000 and \$1 million. Small businesses in the assessment area received 78.2 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate during the same period was 43.1 percent. In 2012, 100 percent of the Small Loans to Businesses originated by the institution were to small businesses in the assessment area, compared to 50.7 percent for aggregate reporters in 2011. In 2008, 2009, 2010, and 2011 an average of 72.3 percent of businesses in the assessment area were small businesses; in 2012 the amount was 77.8 percent.

Community Development Lending

Refer to table 1 Lending Volume in the state of Wisconsin section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, table 5 includes geographic

lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The institution's relatively high level of community development loans in the state of Wisconsin's seven full-scope review assessment areas is good. During the review period, all 16 of the community development loans originated by Bank Mutual in the state of Wisconsin assessment area were located in these seven areas.

Two Community Development loans totaling \$14 million were originated in the Green Bay assessment area -

- In 2010, Bank Mutual granted a \$6.7 million construction/permanent loan to a local developer for the new construction of a 70-unit apartment building in the Section 8 housing program. All units reserved for occupancy by low- and moderate-income households. Some units were reserved for elderly and disabled individuals.
- In 2012, the institution refinanced a \$7.3 million loan for the purpose to renovate two existing Section 8 family housing developments. All units are subsidized for low- and moderate-income individuals.

Six Community Development loans totaling \$424,906 were originated in the Madison assessment area –

- In 2008, Bank Mutual granted an \$82,000 loan to a local developer to purchase and rehabilitate a duplex with two 2-bedroom units. Each unit to be occupied by low-income disabled individuals.
- In 2009, the institution refinanced an existing loan with new money for \$150,906. The new money was for the construction of a 3-bedroom addition to the existing building. Both units are reserved for occupancy by very low-income persons and one live-in caregiver.
- In 2009, Bank Mutual granted a \$50,000 loan to purchase a 2-bedroom condo unit. This unit is part of a HUD-financed project to rehab similar units in the same complex. The unit is to be leased to two low-income disabled individuals.
- In 2009, Bank Mutual granted a \$94,000 loan to purchase and rehabilitate a duplex located in Madison, WI. The units are to be rented to low-income disabled persons or one tenant and one caregiver, both low-income persons.
- In 2011, the institution granted a \$50,000 loan to purchase a 2-bedroom condo unit. This unit is part of the HUD-financed project mentioned above. The unit is to be leased to two low-income disabled individuals.
- In 2012, Bank Mutual granted an \$80,000 loan to purchase and rehabilitate a single family half duplex style home. The unit is to be used as rental housing for a low-income disabled individual or a household with a disabled individual.

Six Community Development loans totaling \$15.3 million were originated in the Milwaukee-Waukesha-West Allis assessment area –

- In 2008, the institution granted a \$113,000 loan to a local developer for the purchase and rehabilitation of a side by side duplex located in West Bend, WI. Each unit is to be occupied by low-income disabled individuals.
- In 2009, Bank Mutual refinanced a \$1.4 million loan which originally was used to construct a 48-unit affordable housing project for seniors in Cedarburg, WI. All units are reserved for occupancy by low-income households.
- In 2010, the institution granted a \$7.6 million construction/permanent loan to a local developer for the purpose of rehabbing a 119-unit apartment building in the Section 8 program. All units are reserved for occupancy by low- or moderate-income senior residents.
- In 2010, Bank Mutual granted an \$8,000 loan to a local developer for the purchase and rehabilitation of a one-bedroom condominium unit located in West Bend, WI. The unit is to be rented to low-income disabled individuals.
- In 2011, the institution refinanced a \$1.8 million loan for 66 rental units located in a moderate-income census tract in Milwaukee, WI. Units are rented by low- to moderate- income tenants.
- In 2012, Bank Mutual refinanced a \$3.7 million loan for an existing 100-unit senior apartment complex constructed in 1997 as low-income tax credit senior apartments. Section 42 tax credits expired in December 2012. The owner has continued participation in the low-income program.
- In 2012, Bank Mutual refinanced a \$700,000 loan for a 30-unit apartment building located in Cedarburg, WI. Units are occupied by tenants holding Section 8 housing vouchers (87 percent).

Two Community Development loans totaling \$2.2 million were originated in the state of Wisconsin nonmetropolitan assessment areas –

- In 2010, Bank Mutual refinanced a \$928,000 loan for an 8-unit and 20-unit Section 8 apartment housing project. All units reserved for occupancy by low- or moderate-income households. Some units are reserved for elderly residents.
- In 2010, the institution refinanced a \$1.2 million loan for an 8-unit and 16-unit Section 8 apartment housing project. All units reserved for occupancy by low- to moderate-income elderly residents. Some units are also reserved for disabled individuals.

Product Innovation and Flexibility

The institution has numerous innovative or flexible loan products and programs that help to serve the credit needs of the assessment area. Many of these products are especially beneficial to low- and moderate-income borrowers. The following is a description of these products:

Bank Mutual CRA Loans

These loans are part of the institution's loan portfolio; they are not sold on the secondary market after origination. The loan program offers either a 5/1 ARM product or a 30-year Fixed Rate product. The program allows borrowers to finance up to 97 percent loan-to-value without having to obtain PMI.

Wisconsin Housing and Economic Development Authority (WHEDA) Loans

These programs are mainly designed to assist low- and moderate-income borrowers in the purchase of a home and to assist first-time homebuyers with limited cash resources. WHEDA loan rates and fees are generally less than those for conventional loans. Construction permanent, condominium, and manufactured housing loans are allowed.

Rural Housing Guaranteed

This program allows low-income borrowers to purchase homes in rural areas, generally defined as communities with populations less than 10,000. Thirty-year fixed rate loans are available with loan-to-value ratios up to 102 percent. For qualifying borrowers, this program does not require a down payment, cash reserves, or mortgage insurance. This loan program utilizes expanded debt ratios in the underwriting process.

Fannie Mae Refi Plus

This program is intended to assist homeowners in refinancing mortgages even if they owe more than their home's current value. The program is meant to put borrowers in a better repayment position by reducing the monthly principal and interest payment, reducing the interest rate, reducing the amortization period, or by moving the borrower from a more risky loan structure to a more stable product.

Wisconsin Department of Veterans Affairs (VA) Loan Program

This program offers veterans a 30-year fixed rate mortgage loan for purchasing a one- to four-family home. State VA loans feature a down payment as low as five percent and do not require private mortgage insurance. This program has certain borrower income limitations and maximum mortgage amounts. Construction and permanent financing loans are also available.

In addition to its HMDA reportable loans, Bank Mutual originated 209 non-HMDA residential mortgage loans (FHA, Rural Housing, VA, and WHEDA) totaling \$24 million in the seven full-scope review areas in the Wisconsin assessment area during the review period. While these government sponsored loan programs have income limitations for the participants, there are no geographic restrictions regarding location of the property. These programs often benefit low- and moderate-income borrowers – 68.4 percent of the number and 59.2 percent of the total dollars originated through these programs in the seven full-scope review areas were distributed to low- and moderate-income borrowers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the lending test in the Fond Du Lac, Janesville, Lake County-Kenosha County IL-WI, Oshkosh-Neenah, and Sheboygan MA assessment areas is not inconsistent with the bank’s overall “High Satisfactory” performance under the lending test in Wisconsin. Refer to the tables 1 through 13 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The institution's performance under the investment test in Wisconsin is rated "Low Satisfactory". Based on full-scope reviews, the institution's performance in the Madison MSA assessment area is excellent. In the Green Bay and Milwaukee-Waukesha-West Allis MSA assessment areas, Bank Mutual's performance is good. Bank Mutual's performance in the Eau Claire and Racine MSA assessment areas and the state of Wisconsin nonmetropolitan assessment areas is adequate. The institution's performance in the Appleton assessment area is weak and should be improved. Refer to table 14 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the review period the institution made one qualifying equity investment totaling \$8.1 million in the Madison assessment area. The investment was initiated in 2012 and consists of a Fannie Mae Mortgage Backed Security on which the underlying loan was used to finance a low-income multifamily housing project in Sun Prairie, WI.

The institution made numerous qualifying grants and donations during the review period. These contributions supported many nonprofit community groups and organizations in the Wisconsin assessment area, particularly in the seven full-scope review areas. The community groups and organizations provide financial and other services, including counseling and educational services to low- and moderate-income individuals and families in these assessment areas.

- Bank Mutual made 31 qualifying grants and donations totaling \$41,649 in the Green Bay assessment area.
- The institution made 32 qualifying grants and donations totaling \$134,554 in the Milwaukee-Waukesha-West Allis assessment area.
- The institution made 13 qualifying grants and donations totaling \$4,500 in the Eau Claire assessment area.
- The Racine assessment area received three qualifying grants and donations totaling \$1,500 from Bank Mutual.
- The institution made eight qualifying grants and donations totaling \$2,350 in the state of Wisconsin nonmetropolitan assessment areas.
- The Appleton assessment area received four qualifying grants and donations from the institution.

In addition to the qualifying investments made to specific assessment areas, the institution made additional qualifying investments to community groups and organizations that provide services to low- and moderate-income individuals and families statewide. While these investments received favorable consideration in the overall state of Wisconsin investment rating, they received limited consideration in the full-scope review areas.

- In 2009, Bank Mutual made a \$25,000 investment in notes issued by a Wisconsin community development company. Notes are issued by the company to raise funds that the company uses to lend to nonprofit community-based organizations throughout Wisconsin. The loans are used to

expand and improve affordable housing, strengthen community services and facilities, stabilize and revitalize neighborhoods, and promote community economic self-sufficiency.

- The institution made 16 qualifying grants and donations totaling \$14,150 to various statewide groups and organizations.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the institution's performance under the investment test in the Fond Du Lac, Janesville, Lake County-Kenosha County IL-WI, Oshkosh-Neenah, and Sheboygan MA assessment areas is not inconsistent with the bank's overall "Low Satisfactory" performance under the investment test in Wisconsin. While Bank Mutual did not make qualifying investments in these areas specifically, the statewide investments made by the institution benefit low- and moderate-income individuals and families throughout Wisconsin, including these limited-scope review areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The institution's performance under the service test in Wisconsin is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Appleton, Eau Claire, and Madison MSA assessment areas is excellent. In the Milwaukee-Waukesha-West Allis MSA assessment area Bank Mutual's performance is good. In the Green Bay and Racine MSA assessment areas and the state of Wisconsin nonmetropolitan assessment areas, the institution's performance is adequate.

Retail Banking Services

Refer to table 15 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Bank Mutual did not open any new branches and closed two branches located in the full-scope review areas of the Wisconsin assessment area during the review period. One of the two closed branches was in a moderate-income tract located in Marinette County of the Wisconsin nonmetropolitan assessment area; it was noted Bank Mutual does have another branch location within five miles of this closed branch. The other closed branch was in a middle-income tract located in Chippewa County of the Eau Claire assessment area; the institution has nine other branches located in this assessment area. The branches were closed due to their low performance and lack of profitability as well as their lack of viability and the overall inability to improve viability.

As of December 31, 2012, the institution has 67 branches and 59 ATMs located throughout the seven full-scope review assessment areas; the majority of these are located in the Eau Claire, Green Bay, and Milwaukee-Waukesha-West Allis assessment areas. While none of Bank Mutual's branches and ATMs are located in low-income areas, 13 branches or 19.4 percent and 10 ATMs or 16.9 percent are located in moderate-income areas throughout the full-scope review areas. These numbers exceed or are equal to the demographics of the entire full-scope area, which indicate moderate-income tracts make up 16.9 percent of the census tracts in the full-scope areas combined. In addition, many of Bank Mutual's branches located in middle- and upper-income areas are within close proximity of low- and/or moderate-

income areas. The institution's hours are reasonable, and its retail services offer a wide range of loan and deposit products at the branches. Bank Mutual provides telephone, online, and mobile banking services which allow customers unlimited access to accounts and various banking services from virtually anywhere. The institution also participates in a non-proprietary ATM network, which allows customers access to funds via ATMs owned by other institutions at no surcharge; these non-proprietary ATMs are located throughout Bank Mutual's assessment areas, including in low- and moderate-income areas.

Community Development Services

The institution provides a relatively high level of community development services. Bank Mutual provides services to low- and moderate-income individuals and families and low- and moderate-income areas in a number of ways. Management and personnel are active in providing technical support and financial expertise to various groups and organizations that serve low- and moderate-income people and low- and moderate-income areas. There were 32 examples of this type of community service noted during the review period for the seven full-scope review areas; the majority of these examples (17) were in the Eau Claire, Green Bay, and Milwaukee-Waukesha-West Allis assessment areas.

In addition, management and personnel are active in providing support and expertise to an additional seven groups and organizations that serve low- and moderate-income people and areas statewide. While these services received favorable consideration in the overall state of Wisconsin services rating, they received limited consideration in the full-scope review areas.

Bank Mutual exhibits good responsiveness to credit, and community and economic development needs by effectively securing grants that benefit low- and moderate-income people. These grants provide increased homeownership opportunities to and promote affordable housing development for low- and moderate-income individuals and families in the institution's assessment areas. During the review period, Bank Mutual secured three grants totaling \$60,000 from the Federal Home Loan Bank (FHLB) of Chicago. In partnership with other financial institutions, Bank Mutual also secured five grants totaling \$906,000 during the review period. These grants benefit low- and moderate-income people within the seven full-scope areas.

Bank Mutual secured an additional five grants totaling \$558,000 benefiting low- and moderate-income people throughout the state of Wisconsin. These services received favorable consideration in the overall state of Wisconsin services rating and received limited consideration in the full-scope review areas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Fond Du Lac, Janesville, Lake County-Kenosha County II-WI, Oshkosh-Neenah, and Sheboygan MA assessment areas is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in Wisconsin. Refer to table 15 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

Multistate Metropolitan Area Rating

Minneapolis-St. Paul-Bloomington MN-WI Metropolitan Area

CRA rating for the Minneapolis-St. Paul-Bloomington MN-WI Metropolitan Area²: Satisfactory

The lending test is rated:	Outstanding
The investment test is rated:	Low Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Bank Mutual's HMDA lending among borrowers of different income levels reflects good distribution. The institution's lending percentages to low- and moderate-income borrowers in the multistate assessment area is near to or equal to the comparable HMDA aggregate. Bank Mutual's geographic distribution of HMDA loans reflects excellent distribution throughout the assessment area.
- Bank Mutual's distribution of small business loans to small businesses in the multistate assessment area is excellent; the institution's percentage for small business loans granted to small businesses exceeds the aggregate reporters. However, Bank Mutual should improve its distribution of small business loans in moderate-income areas of the multistate assessment area.
- The institution's relatively high level of community development loans in the multistate area is good. During the review period, Bank Mutual originated three community development loans in the multistate area totaling \$9.3 million. The institution originated an additional five community development loans totaling \$21.4 million outside of, but directly adjacent to, the multistate assessment area during the review period. The institution has many innovative and flexible lending products available that are beneficial to low- and moderate-income borrowers and low- and moderate-income areas.
- Through its investments in programs, organizations, and groups which benefit low- and moderate-income and low- and moderate-income areas throughout the state of Wisconsin, the institution exhibits adequate responsiveness to credit and community economic development needs and has an adequate level of qualified community development investments, grants, and donations. While these Wisconsin statewide investments benefit portions of the multistate area, Bank Mutual could improve its performance within the assessment area.
- Delivery systems are accessible to essentially all portions of the institution's assessment areas in the assessment area. Although Bank Mutual does not have any branches or ATMs in low-or moderate-income areas, its delivery systems are reasonably accessible to essentially all portions of the institution's multistate assessment area. The institution provides an adequate level of community development services with groups and organizations that provide services to low- and moderate-

² This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

income people throughout the state of Wisconsin, including those in the multistate assessment area. However, Bank Mutual could improve its community development service performance in the area.

Description of Institution's Operations in the Minneapolis-St. Paul-Bloomington MN-WI Multistate Assessment Area

Bank Mutual's Minnesota-Wisconsin multistate assessment area consists of a portion of the Minneapolis-St. Paul-Bloomington MN-WI MSA. The institution has selected Washington County in Minnesota and Pierce and St. Croix Counties in Wisconsin from the MSA as its assessment area.

As of June 30, 2012, the institution held a 2.3 percent deposit market share (\$101.7 million) within the Minnesota-Wisconsin multistate assessment area (ranking Bank Mutual 15th of 35 financial institutions in the assessment area). Of Bank Mutual's 76 branches and 67 ATMs, three branches and ATMs are located in the multistate assessment area. A limited portion of Bank Mutual's HMDA lending is located in the multistate assessment area. During the review period, 5.5 percent of the number and 7.4 percent of the dollar amount of the institution's HMDA lending activity during the review period was conducted in Bank Mutual's multistate area. A limited portion of Bank Mutual's small business lending also occurred in the multistate area. During the review period, 5.1 percent of the number and 1.9 percent of the dollar amount of the institution's small business lending was located in the area.

Refer to the market profile for the Minneapolis-St. Paul-Bloomington MN-WI multistate MA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in the Minneapolis-St. Paul-Bloomington MN-WI Multistate Assessment Area

For Bank Mutual's multistate assessment area, we conducted a full-scope review. A full-scope review is in-depth with analysis based on the overall context of the institution's full performance within each area and test (Lending, Services, and Investments); limited-scope reviews are less in-depth and the analysis is based on comparable demographics within each area and test.

With regard to the full-scope reviews of the institution's overall CRA performance, full-scope reviews in the state of Wisconsin, were weighted the most due to the institution's high levels of lending and services in these areas compared to the multistate area.

During our full-scope review, we reached out to one community contact within the multistate assessment area. The contact represented a community and/or economic development organization or government agency/department and provided information related to the area's community development needs as well as possible ways institutions could meet those needs.

LENDING TEST

Bank Mutual's performance under the lending test in the Minneapolis-St. Paul-Bloomington MN-WI multistate area is rated "Outstanding". Based on our full-scope review, the institution's performance in

the multistate assessment area is excellent. However, Bank Mutual could improve its distribution of small business loans in moderate-income tracts within the assessment area.

Lending Activity

Refer to tables 1 Lending Volume in the “Multistate Metropolitan Area(s)” section of appendix D for the facts and data used to evaluate the bank’s lending activity.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to tables 2, 3, 4, and 5 in the “Multistate Metropolitan Area(s)” 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.

Overall, Bank Mutual's geographic distribution of HMDA reportable loans exceeds aggregate reporters and reflects excellent distribution throughout the full-scope review multistate assessment area. During the review period, the institution originated 1,038 HMDA reportable loans in its Minnesota-Wisconsin multistate assessment area.

During the review period, 106 Home Purchase loans were originated in the Minnesota-Wisconsin multistate assessment area. In 2008, 2009, 2010, and 2011, 4.2 percent of the owner occupied housing units in the assessment area were located in moderate-income areas; in 2012 the amount was 7.4 percent. The assessment area contained zero low-income census tracts during the review period. On average, in 2008 through 2011, Bank Mutual originated 13.2 percent of its Home Purchase loans in moderate-income areas located in the assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 2.9 percent. In 2012, 4.2 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 2.8 percent by aggregate reporters in 2011.

The institution originated 126 Home Improvement loans in the multistate assessment area during the review period. On average, in 2008 through 2011, Bank Mutual originated 12 percent of its Home Improvement loans in moderate-income areas located in the assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 3.2 percent. In 2012, 10.7 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to the aggregate’s 3.3 percent in 2011.

During the review period, 802 Home Mortgage Refinance loans were originated in the Minnesota-Wisconsin multistate assessment area. On average, in 2008 through 2011, Bank Mutual originated 9.6 percent of its Home Mortgage Refinance loans in moderate-income areas located in the assessment area. The average distribution in moderate-income areas for the aggregate during the same period was 2.9 percent. In 2012, 11.6 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were in moderate-income tracts, compared to 2.8 percent for the aggregate in 2011. During the review period, the institution originated four HMDA reportable Multifamily loans in its Minnesota-Wisconsin multistate assessment area. Due to the limited volume, a geographical analysis was not conducted.

Small Loans to Businesses

Refer to table 6 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall, Bank Mutual's geographic distribution of Small Loans to Businesses reflects weak distribution throughout the multistate assessment area and could be improved.

Bank Mutual originated 37 Small Loans to Businesses in the multistate assessment area during the review period. In 2008, 2009, 2010, and 2011, an average of 6 percent of the businesses in the assessment area were located in moderate-income areas; in 2012 the amount was 8.4 percent. The assessment area contained zero low-income census tracts during the review period. During the review period, Bank Mutual originated one business loan in moderate-income areas located in the assessment area. The average distribution in moderate-income areas for the aggregate in 2008 through 2011 was 4.3 percent (4 percent in 2011 alone).

Lending Gap Analysis

A Lending Gap Analysis was not required as no conspicuous gaps were noted in the multistate full-scope review assessment area.

Inside/Outside Ratio

Our review included an analysis of Bank Mutual's distribution of HMDA reportable and Small Business loans originated within its assessment areas compared to similar loans originated by the institution outside of its assessment areas. This analysis was conducted at the institution level (inclusive of all loans originated in all of Bank Mutual's assessment areas combined) as opposed to each assessment area individually. The findings from the Inside/Outside Ratio analysis were favorably factored into the overall analysis of Bank Mutual's distribution of lending by income level of geography.

A high percentage of loans are made in the institution's assessment areas. During the review period, Bank Mutual originated a total of 18,836 HMDA reportable loans totaling \$2.7 billion. Of this amount, 17,162 or 91.1 percent of the total number of HMDA loans and \$2.4 billion or 88.9 percent of the total dollar amount of HMDA loans were secured by properties located inside the assessment areas. Additionally, the institution granted 728 small business loans totaling \$130.1 million during the review period. Of this amount, 698 or 95.9 percent of the total number and \$124.5 million or 95.7 percent of the total dollar amount of small business loans were located in the assessment areas.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to tables 8, 9, and 10 in the “Multistate Metropolitan Area(s)” 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.

Overall, Bank Mutual's distribution of HMDA reportable loans to low- and moderate-income borrowers is near to or equal to aggregate reporters and reflects good proportions throughout the full-scope review multistate assessment area.

In 2008, 2009, 2010, and 2011, 30.7 percent of the families residing in the Minnesota-Wisconsin multistate assessment area were identified as low- or moderate-income; in 2012 the amount was 32.2 percent. On average, in 2008 through 2011, Bank Mutual originated 46.6 percent of its Home Purchase loans to low- or moderate-income borrowers located in the assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 46.3 percent. In 2012, 16.7 percent of the Home Purchase loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to the aggregate’s 45.1 percent in 2011.

On average, in 2008 through 2011, Bank Mutual originated 29.8 percent of its Home Improvement loans to low- or moderate-income borrowers located in the multistate assessment area. The average distribution to low- or moderate-income borrowers for the aggregate during the same period was 32.1 percent. In 2012, 21.4 percent of the Home Improvement loans originated by Bank Mutual in this assessment area were to low- or moderate-income borrowers, compared to 31.4 percent for the aggregate in 2011.

On average, in 2008 through 2011, Bank Mutual originated 37.6 percent of its Home Mortgage Refinance loans to low- or moderate-income borrowers located in the Minnesota-Wisconsin multistate assessment area. The average distribution to low- and moderate-income borrowers for the aggregate during the same period was 29.6 percent. In 2012, 31.5 percent of the Home Mortgage Refinance loans originated by Bank Mutual in this assessment area were to low- and moderate-income borrowers, compared to 27.7 percent in 2011 for aggregate reporters.

Small Loans to Businesses

Refer to table 11 in the “Multistate Metropolitan Area(s)” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination/purchase of small loans to businesses.

Overall, the institution’s distribution of small business loans to business customers of different sizes (including small businesses with revenues of \$1 million or less) within its full-scope review multistate assessment area reflects excellent proportions and exceeds aggregate reporters. Bank Mutual’s distribution of small business loans to small business customers is near to or equal to the percentage of small businesses in the assessment area, reflecting good proportions.

During the review period, Bank Mutual originated 37 Small Loans to Businesses in the multistate assessment area – 29 were under \$100,000; seven were between \$100,000 and less than \$250,000; and one was between \$250,000 and \$1 million. Small businesses in the assessment area received 88 percent of these loans in 2008 through 2011. The distribution of loans to small businesses by the aggregate during the same period was 45.7 percent. In 2012, 75 percent of the Small Loans to Businesses

originated by the institution were to small businesses in the assessment area, compared to 55.1 percent for the aggregate in 2011. In 2008, 2009, 2010, and 2011 an average of 74.9 percent of businesses in the assessment area were small businesses; in 2012 the amount was 76.7 percent.

Community Development Lending

Refer to table 1 Lending Volume in the “Multistate Metropolitan Area(s)” section of appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

The institution’s relatively high level of community development loans in its multistate full-scope review assessment area is excellent. During the review period, Bank Mutual originated three community development loans in the multistate assessment area totaling \$9.3 million.

- In 2010, Bank Mutual refinanced a \$5.3 million loan for six Section 8 housing apartment complexes. All units are reserved for occupancy by low- and moderate-income residents. Four of the six buildings are reserved for low- and moderate-income elderly residents.
- In 2011, Bank Mutual refinanced an outside loan for \$1.7 million for three 8-unit apartment buildings and one 16-unit apartment building. Units are to be rented to low-income tenants.
- In 2012, the institution refinanced a \$2.3 million loan for an existing 56-unit Section 42 townhouse development. Units (60 percent) are limited to tenants with income at or below 60 percent of the area’s median income. The remaining units have monthly rent charges capped according to Section 42 guidelines.

In addition, Bank Mutual originated an additional five community development loans outside of, but adjacent to, its Minnesota-Wisconsin multistate area. While these loans received favorable consideration in the institution’s performance rating, they received less consideration than loans originated within the assessment area.

- In 2011, Bank Mutual refinanced a \$6.2 million loan for six buildings containing 199 rental units located in St. Paul, MN. The buildings are located in a moderate-income census tract. Twenty-two units are occupied by tenants holding Section 8 vouchers.
- In 2011, Bank Mutual refinanced a \$2 million loan for three buildings containing 54 units located in Brooklyn Center, MN in a moderate-income census tract. Rents are set at levels affordable to low- and moderate-income individuals and families.
- In 2012, the institution granted a \$4.4 million loan to purchase an existing 90-unit independent living affordable housing project reserved for senior residents. The project is located in Rice County in a moderate-income census tract. The rents are subsidized by Section 8.

- In 2012, Bank Mutual refinanced a \$5.6 million construction/permanent loan to renovate an existing 62-unit low-income housing project located in Minneapolis, MN. Rents are based on median household income (less than 60 percent) in the county. The project is located in a moderate-income census tract.
- In 2012, Bank Mutual granted a \$3.2 million loan to purchase and rehabilitate a six building apartment complex. Twenty-nine units are maintained as Section 8 rental housing. The apartment complex is located in a moderate-income census tract.

Product Innovation and Flexibility

The institution has numerous innovative or flexible loan products and programs that help to serve the credit needs of the assessment area. Many of these products are especially beneficial to low- and moderate-income borrowers. Refer to the Product Innovation and Flexibility narrative under the state of Wisconsin full-scope analysis for additional information.

In addition to its HMDA reportable loans, Bank Mutual originated 23 non-HMDA residential mortgage loans (FHA, Rural Housing, VA, and WHEDA) totaling \$2.9 million in its multistate assessment area during the review period. While these government sponsored loan programs have income limitations for the participants, there are no geographic restrictions regarding location of the property. These programs often benefit low- and moderate-income borrowers – 86.9 percent of the number and 82.7 percent of the total dollars originated through these programs in the multistate full-scope review area were distributed to low- and moderate-income borrowers.

INVESTMENT TEST

The institution's performance under the investment test in the Minneapolis-St. Paul-Bloomington MN-WI multistate metropolitan area is rated "Low Satisfactory". Based on our full-scope review, Bank Mutual's performance is adequate.

Refer to Table 14 in the "Multistate Metropolitan Area(s)" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Bank Mutual made two minimal qualifying investments in the multistate assessment area during the review period. In addition, the institution made additional qualifying investments to community groups and organizations that provide services to low- and moderate-income individuals and families throughout the state of Wisconsin, including in the Minnesota-Wisconsin multistate assessment area. While these investments received favorable consideration in the institution's overall investment rating, they received limited consideration in this full-scope review. Refer to the Investment Test narrative under the state of Wisconsin full-scope analysis for additional information.

SERVICE TEST

Bank Mutual's performance under the service test in the Minneapolis-St. Paul-Bloomington MN-WI multistate assessment area is rated "Low Satisfactory". Based on our full-scope review, the institution's performance is adequate.

Retail Banking Services

Refer to table 15 in the “Multistate Metropolitan Area(s)” section of appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

Bank Mutual did not open or close any branches located in the multistate assessment area during the review period. As of December 31, 2012, the institution has three branches and three ATMs located throughout the assessment area; all are located in middle-income tracts (9.7 percent of the census tracts in the assessment area are moderate-income and 58.3 percent are middle-income; the area has zero low-income tracts). The institution's hours are reasonable and its retail services offer a wide range of loan and deposit products at the branches. Bank Mutual provides telephone, online, and mobile banking services which allow customers unlimited access to accounts and various banking services from virtually anywhere. The institution also participates in a non-proprietary ATM network which allows customers access to funds via ATMs owned by other institutions at no surcharge; these non-proprietary ATMs are located throughout Bank Mutual's assessment areas, including in low- and moderate-income areas.

Community Development Services

Bank Mutual did not conduct any community development services in the multistate assessment area during the review period. However, management and personnel are active in providing support and expertise to groups and organizations that serve low- and moderate-income people and areas throughout Wisconsin, including in its Minnesota-Wisconsin multistate assessment area. While these services received favorable consideration in the institution’s overall services rating, they received limited consideration in this full-scope review. Refer to the Community Development Services narrative under the state of Wisconsin full-scope analysis for additional information.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 1/01/2008 to 12/31/2012 Investment and Service Tests and CD Loans: 5/22/2008 to 01/28/2013	
Financial Institution	Products Reviewed	
Bank Mutual Brown Deer, WI	HMDA reportable, small business, and community development loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wisconsin Appleton MSA Eau Claire MSA Green Bay MSA Madison MSA Milwaukee-Waukesha- West Allis MSA Racine MSA Wisconsin Nonmetropolitan AA Fond Du Lac MSA Janesville MSA Lake County-Kenosha County IL-WI MA Oshkosh-Neenah MSA Sheboygan MSA Minneapolis-St. Paul-Bloomington MN-WI Multistate MSA	Full Scope Full Scope Full Scope Full Scope Full Scope Full Scope Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Full Scope	N/A N/A N/A N/A N/A N/A N/A N/A N/A N/A N/A N/A N/A

Appendix B: Summary of State and Multistate Metropolitan Area and Ratings

RATINGS BANK MUTUAL				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Bank Mutual	“High Satisfactory”	“Low Satisfactory”	“High Satisfactory”	“Satisfactory”
State or Multistate Metropolitan Area:				
Wisconsin	“High Satisfactory”	“Low Satisfactory”	“High Satisfactory”	“Satisfactory”
Minneapolis-St. Paul-Bloomington MN-WI Multistate AA	“Outstanding”	“Low Satisfactory”	“Low Satisfactory”	“Satisfactory”

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

State of Wisconsin

Appleton WI MSA Assessment Area

Demographic Information for Full-Scope Area: Appleton WI MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	0%	7.8%	76.5%	15.7%	0%
Population by Geography	225,666	0%	7%	75%	18%	0%
Owner-Occupied Housing by Geography	65,496	0%	6.2%	75.8%	18%	0%
Businesses by Geography	16,907	0%	11.2%	76.3%	12.5%	0%
Farms by Geography	1,028	0%	4.4%	79.3%	16.3%	0%
Family Distribution by Income Level	60,294	16.5%	19.2%	26.2%	38.1%	0%
Distribution of Low- and Moderate- Income Families throughout AA Geographies	21,552	0%	9.5%	79.8%	10.7%	0%
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below the Poverty Level	= \$69,972 = \$73,600 = 8%	Median Housing Value Unemployment Rate				= \$157,275 = 6.2%

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

Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

The institution has selected the entire Appleton WI MSA as an assessment area. The area consists of Calumet and Outagamie Counties in eastern Wisconsin. Per 2010 Census data, the area contains 51 census tracts – zero low-income, four moderate-income, 39 middle-income, and eight upper-income tracts. The 6.2 percent unemployment rate in the Appleton MSA is slightly lower than the overall state of Wisconsin rate (6.9 percent) and lower than the overall national rate (8.1 percent). As of June 30, 2012, Bank Mutual held 1.7 percent of the assessment area’s deposits ranking it 17th out of 31 institutions in the area. The institution operates four branches and two ATMs in the Appleton assessment area.

State of Wisconsin

Eau Claire WI MSA Assessment Area

Demographic Information for Full-Scope Area: Eau Claire WI MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0%	16.1%	67.7%	16.1%	0%
Population by Geography	161,151	0%	12.2%	71.3%	16.5%	0%
Owner-Occupied Housing by Geography	63,463	0%	11.9%	73.5%	14.6%	0%
Businesses by Geography	14,658	0%	14.9%	72.2%	12.9%	0%
Farms by Geography	990	0%	15%	70.8%	14.2%	0%
Family Distribution by Income Level	40,225	19%	19.1%	23.8%	38.1%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	15,334	0%	17.9%	71.6%	10.6%	0%
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below the Poverty Level	= \$62,064 = \$64,500 = 13%	Median Housing Value Unemployment Rate				= \$148,098 = 6.3%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

Bank Mutual has selected the entire Eau Claire WI MSA as an assessment area. The area consists of Chippewa and Eau Claire Counties in northwestern Wisconsin. Per 2010 Census data, the area contains 31 census tracts – zero low-income, five moderate-income, 21 middle-income, and five upper-income tracts. The 6.3 percent unemployment rate in the Eau Claire MSA is slightly lower than the overall state of Wisconsin rate (6.9 percent) and lower than the overall national rate (8.1 percent). As of June 30, 2012, Bank Mutual held 6.5 percent of the assessment area’s deposits ranking it sixth out of 23 institutions in the area. The institution operates nine branches and eight ATMs in the Eau Claire assessment area.

State of Wisconsin

Green Bay WI MSA Assessment Area

Demographic Information for Full-Scope Area: Green Bay WI MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	54	3.7%	22.2%	50%	22.2%	1.9%
Population by Geography	248,007	1.8%	19.4%	49.6%	28.8%	0.4%
Owner-Occupied Housing by Geography	64,549	1%	15.9%	52.1%	31%	0%
Businesses by Geography	21,588	1.6%	16.8%	52.5%	29.1%	0%
Farms by Geography	794	0.5%	6.3%	52.9%	40.3%	0%
Family Distribution by Income Level	63,331	18.4%	17.9%	23.3%	40.5%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	22,959	3.1%	29.6%	48.6%	18.8%	0%
Median Family Income = \$64,441 HUD Adjusted Median Family Income for 2012 = \$68,500 Households Below the Poverty Level = 10%			Median Housing Value = \$158,577 Unemployment Rate = 6.3%			

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

The institution has selected a portion of the Green Bay WI MSA as an assessment area. The selected area consists of Brown County in northeastern Wisconsin. Per 2010 Census data, the area contains 54 census tracts – two low-income, 12 moderate-income, 27 middle-income, 12 upper-income and one unassigned tract. The 6.3 percent unemployment rate in the Green Bay assessment area is slightly lower than the overall state of Wisconsin rate (6.9 percent) and lower than the overall national rate (8.1 percent). As of June 30, 2012, Bank Mutual held 5.4 percent of the assessment area’s deposits ranking it fifth out of 21 institutions in the area. The institution operates eight branches and eight ATMs in the Green Bay assessment area.

State of Wisconsin

Madison WI MSA Assessment Area

Demographic Information for Full-Scope Area: Madison WI MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	119	7.6%	15.1%	53.8%	21%	2.5%
Population by Geography	544,906	6.2%	15%	57%	21.2%	0.6%
Owner-Occupied Housing by Geography	139,232	1.5%	12.1%	63%	23.3%	0%
Businesses by Geography	51,837	4.3%	15.8%	56.5%	22.9%	0.5%
Farms by Geography	2,275	0.5%	4.8%	73.8%	20.7%	0.3%
Family Distribution by Income Level	129,417	18.4%	18%	24.9%	38.8%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	47,027	6%	22%	58.7%	13.3%	0%
Median Family Income = \$78,201 HUD Adjusted Median Family Income for 2012 = \$82,900 Households Below the Poverty Level = 11%		Median Housing Value = \$228,201 Unemployment Rate = 5%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

The institution has selected a portion of the Madison WI MSA as an assessment area. The selected area consists of Columbia and Dane Counties in central Wisconsin. Per 2010 Census data, the area contains 119 census tracts – nine low-income, 18 moderate-income, 64 middle-income, 25 upper-income and three unassigned tracts. The 5 percent unemployment rate in the Appleton MSA is lower than the overall state of Wisconsin rate (6.9 percent) and the overall national rate (8.1 percent). As of June 30, 2012, Bank Mutual held 0.6 percent of the assessment area’s deposits ranking it 26th out of 47 institutions in the area. The institution operates five branches and five ATMs in the Madison assessment area.

State of Wisconsin

Milwaukee-Waukesha-West Allis WI MSA AA

Demographic Information for Full-Scope Area: Milwaukee-Waukesha-West Allis WI MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	429	20.1%	17.9%	35.2%	26.6%	0.2%
Population by Geography	1,555,908	14.7%	16.2%	36.1%	33%	0%
Owner-Occupied Housing by Geography	386,906	6.7%	12.9%	39.8%	40.5%	0%
Businesses by Geography	116,999	9.9%	14.1%	37%	39%	0%
Farms by Geography	2,131	3.3%	6.7%	43.4%	46.6%	0%
Family Distribution by Income Level	389,825	22.1%	16.9%	20.6%	40.4%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	152,194	25.8%	23.6%	33.2%	17.4%	0%
Median Family Income = \$68,787 HUD Adjusted Median Family Income for 2012 = \$73,200 Households Below the Poverty Level = 12%			Median Housing Value = \$203,186 Unemployment Rate = 7.5%			

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

The institution has selected the entire Milwaukee-Waukesha-West Allis WI MSA as an assessment area. The area consists of Milwaukee, Ozaukee, Washington, and Waukesha Counties in southeastern Wisconsin. Per 2010 Census data, the area contains 429 census tracts – 86 low-income, 77 moderate-income, 151 middle-income, 114 upper-income, and one unassigned tracts. The 7.5 percent unemployment rate in the Milwaukee-Waukesha-West Allis MSA is slightly higher than the overall state of Wisconsin rate (6.9 percent) and slightly lower than the overall national rate (8.1 percent). As of June 30, 2012, Bank Mutual held 1.4 percent of the assessment area’s deposits ranking it ninth out of 56 institutions in the area. The institution operates 23 branches and 20 ATMs in the Milwaukee-Waukesha-West Allis assessment area.

State of Wisconsin

Racine WI MSA AA

Demographic Information for Full-Scope Area: Racine WI MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	44	4.5%	15.9%	52.3%	27.3%	0%
Population by Geography	195,408	4.7%	14.3%	53.5%	27.5%	0%
Owner-Occupied Housing by Geography	52,833	2.2%	10.8%	54.9%	32.1%	0%
Businesses by Geography	15,081	3.9%	12.2%	54.1%	29.8%	0%
Farms by Geography	549	0.9%	4.7%	49.9%	44.4%	0%
Family Distribution by Income Level	50,561	20.7%	16.9%	23%	39.4%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	19,007	7.9%	19.5%	54.3%	18.2%	0%
Median Family Income = \$65,200 HUD Adjusted Median Family Income for 2012 = \$69,700 Households Below the Poverty Level = 10%		Median Housing Value = \$176,764 Unemployment Rate = 8.5%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

Bank Mutual has selected the entire Racine WI MSA as an assessment area. The area consists of Racine County in southeastern Wisconsin. Per 2010 Census data, the area contains 44 census tracts – two low-income, seven moderate-income, 23 middle-income, and 12 upper-income tracts. The 8.5 percent unemployment rate in the Racine MSA is higher than the overall state of Wisconsin rate (6.9 percent) and slightly higher than the overall national rate (8.1 percent). As of 6/30/2012, Bank Mutual held 0.9 percent of the assessment area’s deposits ranking it 14th out of 15 institutions in the area. The institution operates two branches and two ATMs in the Racine assessment area.

State of Wisconsin

WI Nonmetropolitan Assessment Areas

Demographic Information for Full-Scope Area: WI Nonmetropolitan AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	113	0%	12.4%	79.6%	8%	0%
Population by Geography	457,746	0%	9.4%	82.4%	8.2%	0%
Owner-Occupied Housing by Geography	144,556	0%	10.1%	80.9%	9%	0%
Businesses by Geography	39,728	0%	9.7%	83.7%	6.6%	0%
Farms by Geography	4,199	0%	4.7%	86.2%	9.1%	0%
Family Distribution by Income Level	127,965	18.4%	19.2%	23.8%	38.5%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	48,173	0%	14.6%	79.9%	5.5%	0%
Median Family Income = \$57,384 HUD Adjusted Median Family Income for 2012 = \$59,900 Households Below the Poverty Level = 11%			Median Housing Value = \$152,487 Unemployment Rate = 5.9 – 9.9%			

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

Bank Mutual has selected the following nonmetropolitan areas as assessment areas – the entire counties of Barron, Dodge, Door, Dunn, Green Lake, Marinette, Polk, Sawyer, Shawano, Washburn, and Waupaca, and the western portion of Manitowoc County (four census tracts). For review purposes, these nonmetropolitan areas have been combined into one assessment area. Per 2010 Census data, these areas contain 113 census tracts – zero low-income, 14 moderate-income, 90 middle-income, and nine upper-income tracts. The unemployment rate in these areas range from a low of 5.9 percent in Dunn County to a high of 9.9 percent in Sawyer County; compared to 6.9 percent statewide and 8.1 percent nationally. As of June 30, 2012, Bank Mutual held a combined 4.1 percent of these area’s deposits ranking it seventh out of 75 institutions in the areas. The institution operates 16 branches and 14 ATMs in the nonmetropolitan assessment areas.

Minneapolis-St. Paul-Bloomington MN-W Multistate Metropolitan Assessment Area

Demographic Information for Full-Scope Area: Minneapolis-St. Paul-Bloomington MN-WI MA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	72	0%	9.7%	58.3%	29.2%	2.8%
Population by Geography	363,500	0%	7.5%	63.6%	28.3%	0.6%
Owner-Occupied Housing by Geography	108,967	0%	7.4%	63.4%	29.2%	0%
Businesses by Geography	33,278	0%	8.4%	62.3%	29.3%	0%
Farms by Geography	1,719	0%	15.6%	62.8%	21.6%	0%
Family Distribution by Income Level	96,912	14.5%	17.7%	25.2%	42.6%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	31,199	0%	11.9%	71.5%	16.6%	0%
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below the Poverty Level	= \$80,925 = \$83,900 = 6%	Median Housing Value Unemployment Rate		= \$259,616 = 5.5%		

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census, and 2012 HUD updated MFI. 2012 Unemployment Rate as of 1/31/2013 per Bureau of Labor Statistics.

The institution has selected a portion of the Minneapolis-St. Paul-Bloomington MN-WI Multistate MA as an assessment area. The area consists of Washington County in Minnesota and Pierce and St. Croix Counties in Wisconsin. Per 2010 Census data, the area contains 72 census tracts – zero low-income, seven moderate-income, 42 middle-income, and 21 upper-income tracts. The 5.5 percent unemployment rate in the Minneapolis-St. Paul-Bloomington Multistate MA is slightly lower than the overall state of Minnesota rate (5.7 percent), lower than the overall state of Wisconsin rate (6.9 percent) and also lower than the overall national rate (8.1 percent). As of June 30, 2012, Bank Mutual held 2.27 percent of the assessment area’s deposits ranking it 15th out of 35 institutions in the area. The institution operates three branches and three ATMs in the Minneapolis-St. Paul-Bloomington MN-WI MA assessment area.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 as originations/purchases and aggregate lending is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core tables 2 through 7 and part of table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core tables 8 through 12 and part of table 13. 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of

multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** – N/A
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** – N/A
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the

investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

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

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

Tables of Performance Data

State of Wisconsin

Minneapolis-St. Paul-Bloomington NM-WI Multistate Metropolitan Area

Table 1. Lending Volume

LENDING VOLUME		Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
APPLETON WI MSA	5.2%	854	\$100,882	26	\$4,114	N/A	N/A	0	0	880	\$104,996	2.7%
EAU CLAIRE WI MSA	13.8%	2,249	\$265,485	64	\$8,984	N/A	N/A	0	0	2,313	\$274,469	6.8%
GREEN BAY WI MSA	18%	2,897	\$355,597	118	\$16,517	N/A	N/A	0	0	3,017	\$386,014	12.2%
MADISON WI MSA	4.2%	679	\$125,989	16	\$1,849	N/A	N/A	6	\$507	701	\$128,345	3.7%
MILWAUKEE-WAUKESHA-WEST ALLIS WI MSA	30%	4,752	\$828,721	263	\$62,067	N/A	N/A	7	\$15,271	5,022	\$906,059	52.2%
RACINE WI MSA	2.7%	449	\$64,890	12	\$1,437	N/A	N/A	0	0	461	\$66,327	1.2%
WI NONMETROPOLITAN AA	20.4%	3,301	\$355,602	121	\$19,437	N/A	N/A	2	\$2,168	3,424	\$377,207	15.5%
Limited Review:												

* Loan Data as of 12/31/2012. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is 05/22/2008 to 01/28/2013.

*** Deposit Data as of 06/30/2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

LENDING VOLUME		Geography: WISCONSIN					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
FOND DU LAC WI MSA	0.8%	127	\$27,255	3	\$1,419	N/A	N/A	0	0	130	\$28,674	1.2%
JANESVILLE WI MSA	2%	322	\$42,917	7	\$1,205	N/A	N/A	1	\$4,270	330	\$48,392	2.2%
LAKE COUNTY-KENOSHA COUNTY IL-WI MA	1%	162	\$26,682	7	\$344	N/A	N/A	0	0	169	\$27,026	0.6%
OSHKOSH-NEENAH WI MSA	1.2%	172	\$20,766	21	\$4,509	N/A	N/A	0	0	193	\$25,275	0.4%
SHEBOYGAN WI MSA	1%	160	\$29,684	3	\$157	N/A	N/A	1	\$3,550	164	\$33,391	1.2%

LENDING VOLUME		Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE MSA										
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012		Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA *	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MSA	100%	1,038	\$169,758	37	\$2,428	N/A	N/A	3	\$9,305	1,078	\$181,491	100%

* Loan Data as of 12/31/2012. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is 05/22/2008 to 01/28/2013.

*** Deposit Data as of 06/30/2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: WISCONSIN				Evaluation Period: JANUARY 01, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
APPLETON WI (2008-2011)	78	3.1%	0%	0%	4.7%	4.7%	83.5%	84.5%	11.9%	10.7%	0%	5.5%	75%	19.5%
APPLETON WI (2012)	28	1.1%	0%	0%	6.2%	32.1%	75.8%	50%	18%	17.9%	N/A	N/A	N/A	N/A
EAU CLAIRE WI (2008-2011)	271	10.9%	0%	0%	9.9%	11.2%	72.2%	70.7%	17.9%	18.1%	0%	10.5%	72.9%	16.6%
EAU CLAIRE WI (2012)	106	4.2%	0%	0%	11.9%	10.4%	73.5%	78.3%	14.6%	11.3%	N/A	N/A	N/A	N/A
GREEN BAY WI (2008-2011)	340	13.6%	0%	0%	9.6%	6.5%	66%	63.3%	24.5%	30.2%	0%	8.1%	64.8%	27.1%
GREEN BAY WI (2012)	94	3.8%	1%	1.1%	15.9%	13.8%	52.1%	39.4%	31%	45.7%	N/A	N/A	N/A	N/A
MADISON WI (2008-2011)	81	3.2%	0.6%	0%	14.2%	11.1%	64.9%	66.8%	20.2%	22.1%	0.6%	11%	62.5%	25.9%
MADISON WI (2012)	21	0.8%	1.5%	0%	12.1%	9.5%	63%	57.1%	23.3%	33.3%	N/A	N/A	N/A	N/A
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	621	24.9%	4.5%	3.4%	12.1%	9%	46.6%	45.7%	36.9%	42%	2.6%	10.1%	48.7%	38.6%
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	209	8.4%	6.7%	2.4%	12.9%	15.3%	39.8%	43.5%	40.5%	38.8%	N/A	N/A	N/A	N/A
RACINE WI (2008-2011)	82	3.3%	3.4%	1.2%	6.6%	9.6%	71.6%	67.1%	18.4%	22.1%	1.9%	5.9%	73.9%	18.4%
RACINE WI (2012)	15	0.6%	2.2%	0%	10.8%	13.3%	54.9%	60%	32.1%	26.7%	N/A	N/A	N/A	N/A
WI NONMETROPOLITAN (2008-2011)	279	11.2%	0%	0%	2.2%	1.3%	90.6%	94.6%	7.3%	4.1%	0%	1.5%	91.7%	6.8%

* Based on 2008 through 2011 Peer Mortgage Data: WISCONSIN Region. Peer Mortgage Data for 2012 not available as of report date.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

WI NONMETROPOLITAN (2012)	94	3.8%	0%	0%	10.1%	13.8%	81%	74.5%	9%	11.7%	N/A	N/A	N/A	N/A
Limited Review:														
FOND DU LAC WI (2008-2011)	13	0.5%	0%	0%	0%	0%	92%	100%	8%	0%	0%	0%	91.5%	8.5%
FOND DU LAC WI (2012)	5	0.2%	0%	0%	6.2%	0%	85.4%	80%	8.4%	20%	N/A	N/A	N/A	N/A
JANESVILLE WI (2008-2011)	34	1.4%	0%	0%	13.9%	3.6%	64.9%	47.5%	21.2%	48.9%	0%	12.4%	60.4%	27.2%
JANESVILLE WI (2012)	20	0.8%	4.6%	0%	15.7%	40%	55.9%	50%	23.9%	10%	N/A	N/A	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL- WI (2008-2011)	47	1.9%	2.9%	10.7%	37.2%	27%	59.9%	62.3%	0%	0%	3.9%	33%	63.1%	0%
LAKE COUNTY- KENOSHA COUNTY IL- WI (2012)	10	0.4%	10.1%	20%	28.9%	50%	61%	30%	0%	0%	N/A	N/A	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	15	0.6%	0%	0%	5.2%	12.5%	74%	76.4%	20.8%	11.1%	0%	5.5%	70.9%	23.6%
OSHKOSH-NEENAH WI (2012)	8	0.3%	0%	0%	10.9%	0%	69.9%	75%	19.3%	25%	N/A	N/A	N/A	N/A
SHEBOYGAN WI (2008-2011)	21	0.8%	0%	0%	10.8%	19.8%	75.9%	67.7%	13.3%	12.5%	0%	9.8%	73.3%	16.9%
SHEBOYGAN WI (2012)	3	0.1%	0%	0%	18.7%	33.3%	73.4%	66.7%	7.9%	0%	N/A	N/A	N/A	N/A

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Evaluation Period: JANUARY 01, 2008 TO DECEMBER 31, 2012														
Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA														
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	82	77.4%	0%	0%	4.2%	13.2%	60.7%	63%	35.1%	23.8%	0%	2.9%	58.7%	38.3%
MINNEAPOLIS-ST. PAUL- BLOOMINGTON (2012)	24	22.6%	0%	0%	7.4%	4.2%	63.4%	70.8%	29.2%	25%	N/A	N/A	N/A	N/A

* Based on 2008 through 2011 Peer Mortgage Data: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MULTISTATE Region. Peer Mortgage Data for 2012 not available as of report date.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: WISCONSIN		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*						
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp			
Full Review:																	
APPLETON WI (2008-2011)	78	5.1%	0%	0%	4.7%	0%	83.5%	97.1%	11.9%	2.9%	0%	4.8%	79.1%	16.1%			
APPLETON WI (2012)	24	1.6%	0%	0%	6.2%	8.3%	75.8%	75%	18%	16.7%	N/A	N/A	N/A	N/A			
EAU CLAIRE WI (2008-2011)	209	13.7%	0%	0%	9.9%	5.3%	72.2%	74.3%	17.9%	20.4%	0%	9.7%	75.8%	14.4%			
EAU CLAIRE WI (2012)	94	6.2%	0%	0%	11.9%	7.5%	73.5%	76.6%	14.6%	16%	N/A	N/A	N/A	N/A			
GREEN BAY WI (2008-2011)	199	13%	0%	0%	9.6%	2.8%	66%	69.6%	24.5%	27.6%	0%	6.1%	66.7%	27.2%			
GREEN BAY WI (2012)	45	2.9%	1%	0%	15.9%	15.6%	52.1%	48.9%	31%	35.6%	N/A	N/A	N/A	N/A			
MADISON WI (2008-2011)	27	1.8%	0.6%	0%	14.2%	17.5%	64.9%	53.4%	20.2%	29.1%	0.3%	11.9%	67.5%	20.2%			
MADISON WI (2012)	10	0.7%	1.5%	0%	12.1%	30%	63%	40%	23.3%	30%	N/A	N/A	N/A	N/A			
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	238	15.6%	4.5%	4.1%	12.1%	12.1%	46.6%	44.5%	36.9%	39.2%	3.3%	9.4%	47.5%	39.8%			
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	57	3.7%	6.7%	7%	12.9%	8.8%	39.8%	33.3%	40.5%	50.9%	N/A	N/A	N/A	N/A			
RACINE WI (2008-2011)	28	1.8%	3.4%	6.4%	6.6%	8.7%	71.6%	69.7%	18.4%	15.3%	2.2%	5.1%	68.1%	24.6%			
RACINE WI (2012)	7	0.5%	2.2%	0%	10.8%	0%	54.9%	71.4%	32.1%	28.6%	N/A	N/A	N/A	N/A			
WI NONMETROPOLITAN (2008-2011)	351	23%	0%	0%	2.2%	1.4%	90.6%	94.8%	7.3%	3.8%	0%	1.9%	88.3%	9.8%			

* Based on 2008 through 2011 Peer Mortgage Data: WISCONSIN Region. Peer Mortgage Data for 2012 not available as of report date.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

WI NONMETROPOLITAN (2012)	93	6.1%	0%	0%	10.1%	17.2%	81%	73.1%	9%	9.7%	N/A	N/A	N/A	N/A
Limited Review:														
FOND DU LAC WI (2008-2011)	3	0.2%	0%	0%	0%	0%	92%	100%	8.4%	0%	0%	0%	90.9%	9.1%
FOND DU LAC WI (2012)	3	0.2%	0%	0%	6.2%	0%	85.4%	100%	8.4%	0%	N/A	N/A	N/A	N/A
JANESVILLE WI (2008-2011)	16	1.0%	0%	0%	13.9%	53.3%	64.9%	60.8%	21.2%	25.8%	0%	14.4%	64.7%	20.9%
JANESVILLE WI (2012)	4	0.3%	4.6%	0%	15.7%	0%	55.9%	75%	23.9%	25%	N/A	N/A	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL-WI (2008-2011)	4	0.3%	2.9%	0%	37.2%	0%	59.9%	100%	0%	0%	6.5%	39.1%	54.4%	0%
LAKE COUNTY- KENOSHA COUNTY IL-WI (2012)	1	0.1%	10.1%	0%	28.9%	0%	61%	100%	0%	0%	N/A	N/A	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	14	0.9%	0%	0%	5.2%	4.2%	74%	56.3%	20.8%	39.6%	0%	5.2%	73.5%	21.3%
OSHKOSH-NEENAH WI (2012)	3	0.2%	0%	0%	10.9%	66.7%	69.9%	0%	19.3%	33.3%	N/A	N/A	N/A	N/A
SHEBOYGAN WI (2008-2011)	11	0.7%	0%	0%	10.8%	0%	75.9%	100%	13.3%	0%	0%	10.7%	72%	17.3%
SHEBOYGAN WI (2012)	7	0.5%	0%	0%	18.7%	14.3%	73.4%	85.7%	7.9%	0%	N/A	N/A	N/A	N/A

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012												Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp	
Full Review:															
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	98	77.8%	0%	0%	4.2%	12%	60.7%	56.1%	35.1%	31.9%	0%	3.2%	55%	41.8%	
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2012)	28	22.2%	0%	0%	7.4%	10.7%	63.4%	67.9%	29.2%	21.4%	N/A	N/A	N/A	N/A	

* Based on 2008 through 2011 Peer Mortgage Data: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE Region. Peer data for 2012 not available as of report date.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*								
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
APPLETON WI (2008-2011)	420	3.5%	0%	0%	4.7%	0.6%	83.5%	92.5%	11.9%	6.9%	0%	3.1%	74.8%	22.1%					
APPLETON WI (2012)	222	1.9%	0%	0%	6.2%	17.6%	75.8%	70.3%	18%	12.2%	N/A	N/A	N/A	N/A					
EAU CLAIRE WI (2008-2011)	1,169	9.7%	0%	0%	9.9%	7.3%	72.2%	68.3%	17.9%	24.4%	0%	8.4%	72.1%	19.6%					
EAU CLAIRE WI (2012)	392	3.3%	0%	0%	11.9%	7.1%	73.5%	72.7%	14.6%	20.2%	N/A	N/A	N/A	N/A					
GREEN BAY WI (2008-2011)	1,573	13.1%	0%	0%	9.6%	3.8%	66%	66.9%	24.5%	29.3%	0%	4.3%	64.3%	31.4%					
GREEN BAY WI (2012)	624	5.2%	1%	0.8%	15.9%	10.3%	52.1%	50.8%	31%	38.1%	N/A	N/A	N/A	N/A					
MADISON WI (2008-2011)	420	3.5%	0.6%	0%	14.2%	18.7%	64.9%	59.1%	20.2%	22.2%	0.4%	9.3%	63.5%	26.8%					
MADISON WI (2012)	112	0.9%	1.5%	0%	12.1%	12.5%	63%	58%	23.3%	29.5%	N/A	N/A	N/A	N/A					
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	2,731	22.8%	4.5%	1.4%	12.1%	6.1%	46.6%	42.2%	36.9%	50.4%	1.8%	6.5%	43%	48.8%					
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	861	7.2%	6.7%	1.6%	12.9%	6.4%	39.8%	40.3%	40.5%	51.7%	N/A	N/A	N/A	N/A					
RACINE WI (2008-2011)	250	2.1%	3.4%	0.8%	6.6%	2.8%	71.6%	66.6%	18.4%	29.8%	1.6%	4.5%	70%	23.9%					
RACINE WI (2012)	65	0.5%	2.2%	0%	10.8%	0%	54.9%	60%	32.1%	40%	N/A	N/A	N/A	N/A					
WI NONMETROPOLITAN (2008-2011)	1,775	14.8%	0%	0%	2.2%	1.9%	90.6%	92.1%	7.3%	6%	0%	1.7%	89.5%	8.8%					

* Based on 2008 through 2011 Peer Mortgage Data: WISCONSIN Region. Peer data for 2012 not available as of report date.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information (for loans originated 2008-2011) and 2010 Census information (for loans originated 2012).

WI NONMETROPOLITAN (2012)	705	5.9%	0%	0%	10.1%	12.5%	81%	77.7%	9%	9.8%	N/A	N/A	N/A	N/A
Limited Review:														
FOND DU LAC WI (2008-2011)	67	0.6%	0%	0%	0%	0%	92%	91.4%	8%	8.6%	0%	0%	87.7%	12.4%
FOND DU LAC WI (2012)	31	0.3%	0%	0%	6.2%	6.5%	85.4%	87.1%	8.4%	6.5%	N/A	N/A	N/A	N/A
JANESVILLE WI (2008-2011)	187	1.6%	0%	0%	13.9%	8.7%	64.9%	52.3%	21.2%	39%	0%	7.3%	61.3%	31.4%
JANESVILLE WI (2012)	55	0.5%	4.6%	0%	15.7%	16.4%	55.9%	49.1%	23.9%	34.6%	N/A	N/A	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL-WI (2008-2011)	85	0.7%	2.9%	0%	37.2%	33.1%	59.9%	66.9%	0%	0%	2.2%	28.2%	69.6%	0%
LAKE COUNTY- KENOSHA COUNTY IL-WI (2012)	15	0.1%	10.1%	13.3%	28.9%	26.7%	61%	60%	0%	0%	N/A	N/A	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	71	0.6%	0%	0%	5.2%	2.3%	74%	68%	20.8%	29.6%	0%	3.6%	66.9%	29.5%
OSHKOSH-NEENAH WI (2012)	59	0.5%	0%	0%	10.9%	8.5%	69.9%	61%	19.3%	30.5%	N/A	N/A	N/A	N/A
SHEBOYGAN WI (2008-2011)	85	0.7%	0%	0%	10.8%	6.1%	75.9%	74.6%	13.3%	19.4%	0%	7.1%	70.8%	22.1%
SHEBOYGAN WI (2012)	30	0.2%	0%	0%	18.7%	20%	73.4%	63.3%	7.9%	16.7%	N/A	N/A	N/A	N/A

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MULTISTATE AA			
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp	
Full Review:															
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	603	75.2%	0%	0%	4.2%	9.6%	60.7%	61.7%	35.1%	28.7%	0%	2.9%	56.7%	40.4%	
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2012)	199	24.8%	0%	0%	7.4%	11.6%	63.4%	67.3%	29.2%	21.1%	N/A	N/A	N/A	N/A	

* Based on 2008 through 2011 Peer Mortgage Data: MINNEAPOLIS- ST. PAUL- BLOOMINGTON MN-WI MULTISTATE Region. Peer data for 2012 not available as of report date.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information (for loans originated 2008-2011) and 2010 Census data (for loans originated 2012).

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: WISCONSIN					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid
Full Review:															
APPLETON WI (2008-2011)	2	2%	0%	0%	8.8%	0%	81.1%	100%	10.1%	0%	0%	0%	0%	94.4%	5.6%
APPLETON WI (2012)	2	2%	0%	0%	14.9%	0%	79.4%	50%	5.8%	50%	N/A	N/A	N/A	N/A	
EAU CLAIRE WI (2008-2011)	5	5.1%	0%	0%	32.4%	60%	46.3%	40%	21.3%	0%	0%	28.1%	56.6%	15.4%	
EAU CLAIRE WI (2012)	3	3%	0%	0%	15.4%	66.7%	65.5%	33.3%	19.1%	0%	N/A	N/A	N/A	N/A	
GREEN BAY WI (2008-2011)	17	17.2%	0%	0%	22.9%	14.8%	69%	81.6%	8.1%	3.6%	0%	17.9%	62.4%	19.7%	
GREEN BAY WI (2012)	5	5.1%	2.1%	0%	25.1%	0%	57.5%	20%	15.3%	80%	N/A	N/A	N/A	N/A	
MADISON WI (2008-2011)	5	5.1%	15.6%	0%	20.6%	0%	48.5%	60%	15.2%	40%	14.6%	19.3%	52.7%	13.5%	
MADISON WI (2012)	3	3%	16%	0%	22.6%	33.3%	42%	66.7%	19.4%	0%	N/A	N/A	N/A	N/A	
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	21	21.2%	12.6%	0%	19.5%	33%	48.1%	44.3%	19.8%	22.8%	14.3%	24.6%	45.2%	16%	
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	14	14.1%	15.4%	14.3%	15.9%	28.6%	45.4%	42.9%	23.3%	14.3%	N/A	N/A	N/A	N/A	
RACINE WI (2008-2011)	1	1%	3.3%	0%	24.3%	0%	57%	100%	15.4%	0%	9%	23.7%	61.6%	5.7%	
RACINE WI (2012)	1	1%	2.3%	0%	21.9%	0%	49.6%	0%	26.3%	100%	N/A	N/A	N/A	N/A	
WI NONMETROPOLITAN (2008-2011)	2	2%	0%	0%	0.5%	0%	97.4%	100%	2.2%	0%	0%	0.4%	97.1%	2.5%	

* Based on 2008 through 2011 Peer Mortgage Data: WISCONSIN Region. Peer mortgage data for 2012 not available as of report date.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information (for loans originated 2008-2011) and 2010 Census information (for loans originated 2012).

WI NONMETROPOLITAN (2012)	2	2%	0%	0%	7.6%	0%	89%	100%	3.5%	0%	N/A	N/A	N/A	N/A	
Limited Review:															
FOND DU LAC WI (2008-2011)	2	2%	0%	0%	0%	0%	97.6%	50%	2.4%	50%	0%	0%	98.9%	1.1%	
FOND DU LAC WI (2012)	3	3%	0%	0%	40.1%	0%	55.3%	100%	4.5%	0%	N/A	N/A	N/A	N/A	
JANESVILLE WI (2008-2011)	3	3%	0%	0%	22.2%	33.3%	54.8%	33.3%	23%	33.3%	0%	18.2%	58.9%	23%	
JANESVILLE WI (2012)	3	3%	11.5%	0%	22.4%	0%	38.7%	0%	27.3%	100%	N/A	N/A	N/A	N/A	
LAKE COUNTY- KENOSHA COUNTY IL-WI (2008-2011)	0	0%	9.6%	0%	39.6%	0%	50.9%	0%	0%	0%	15.6%	45.1%	39.4%	0%	
LAKE COUNTY- KENOSHA COUNTY IL-WI (2012)	0	0%	16.6%	0%	36.5%	0%	46.9%	0%	0%	0%	N/A	N/A	N/A	N/A	
OSHKOSH-NEENAH WI (2008-2011)	2	2%	0%	0%	8.9%	50%	76.3%	50%	14.8%	0%	0%	5.6%	86.9%	7.5%	
OSHKOSH-NEENAH WI (2012)	0	0%	0%	0%	27.9%	0%	59%	0%	13.2%	0%	N/A	N/A	N/A	N/A	
SHEBOYGAN WI (2008-2011)	3	3%	0%	0%	32.2%	0%	62.8%	66.7%	5%	33.3%	0%	19.4%	77.8%	2.8%	
SHEBOYGAN WI (2012)	0	0%	0%	0%	41.9%	0%	52.4%	0%	5.7%	0%	N/A	N/A	N/A	N/A	

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012		Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA													
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp	
Full Review:															
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	3	75%	0%	0%	10.8%	40%	76%	60%	13.2%	0%	0%	8.2%	74.2%	17.7%	
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2012)	1	25%	0%	0%	11.9%	0%	77.3%	100%	10.7%	0%	N/A	N/A	N/A	N/A	

* Based on 2008 through 2011 Peer Mortgage Data: MINNEAPOLIS-ST. PAUL- BLOOMINGTON MN-WI MULTISTATE Region. Peer data from 2012 not available as of report date.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information (for loans originated 2008-2011) and 2010 Census information (for loans originated 2012).

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
APPLETON WI (2008-2011)	14	2.3%	0%	0%	8.2%	4.2%	75.3%	95.8%	16.4%	0%	0%	8.4%	73.7%	17.9%					
APPLETON WI (2012)	12	2%	0%	0%	11.2%	33.3%	76.3%	66.7%	12.5%	0%	N/A	N/A	N/A	N/A					
EAU CLAIRE WI (2008-2011)	40	6.7%	0%	0%	18.8%	3.9%	67%	89.1%	14.2%	7%	0%	19.6%	62.4%	17.9%					
EAU CLAIRE WI (2012)	24	4%	0%	0%	14.9%	25%	72.3%	62.5%	12.9%	12.5%	N/A	N/A	N/A	N/A					
GREEN BAY WI (2008-2011)	21	3.5%	0%	0%	14.9%	24.4%	65.2%	58.8%	19.9%	16.9%	0%	14.2%	63.8%	22%					
GREEN BAY WI (2012)	34	5.7%	1.6%	2.9%	16.8%	23.5%	52.5%	47%	29.1%	26.5%	N/A	N/A	N/A	N/A					
MADISON WI (2008-2011)	8	1.3%	3.9%	0%	14.3%	0%	62%	100%	19.8%	0%	3.2%	13.7%	60.1%	23.1%					
MADISON WI (2012)	8	1.3%	4.3%	0%	15.8%	50%	56.5%	50%	22.9%	0%	N/A	N/A	N/A	N/A					
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	140	23.4%	7.8%	3.8%	13.4%	5.7%	42.6%	53.6%	35.6%	36.9%	4.7%	9.8%	42%	43.5%					
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	123	20.6%	9.9%	13.8%	14.1%	9.8%	37%	47.2%	39%	29.3%	N/A	N/A	N/A	N/A					
RACINE WI (2008-2011)	9	1.5%	5.9%	11.1%	10.2%	11.1%	69.5%	55.6%	14.4%	22.2%	4.8%	9.7%	68.9%	16.7%					
RACINE WI (2012)	3	0.5%	3.9%	33.3%	12.2%	0%	54.1%	33.3%	29.8%	33.3	N/A	N/A	N/A	N/A					
WI NONMETROPOLITAN (2008-2011)	87	14.5%	0%	0%	1.8%	0%	92.6%	100%	5.6%	0%	0%	1.6%	89.8%	8.6%					

* Based on 2008 through 2011 Peer Small Business Data: US. Peer Data for 2012 not available as of report date.

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

*** Source Data - Dun and Bradstreet 2008 through 2012

WI NONMETROPOLITAN (2012)	34	5.7%	0%	0%	9.7%	11.8%	83.7%	88.2%	6.6%	0%	N/A	N/A	N/A	N/A
Limited Review:														
FOND DU LAC WI (2008-2011)	2	0.3%	0%	0%	0%	0%	94.1%	100%	5.9%	0%	0%	0%	90.6%	9.4%
FOND DU LAC WI (2012)	1	0.2%	0%	0%	17.8%	0%	76.6%	100%	5.7%	0%	N/A	N/A	N/A	N/A
JANESVILLE WI (2008-2011)	2	0.3%	0%	0%	17.4%	0%	58.1%	100%	24.4%	0%	0%	16%	52.9%	31.1%
JANESVILLE WI (2012)	5	0.8%	7.5%	0%	18.5%	0%	47.5%	40%	26.5%	60%	N/A	N/A	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL-WI (2008-2011)	3	0.5%	8.6%	33.3%	37%	66.7%	58.5%	0%	0%	0%	6.6%	28.6%	64.8%	0%
LAKE COUNTY- KENOSHA COUNTY IL-WI (2012)	4	0.7%	15.9%	25%	25.2%	0%	58.9%	75%	0%	0%	N/A	N/A	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	16	2.7%	0%	0%	6.8%	6.3%	72.3%	75%	0%	0%	0%	6%	69.3%	24.7%
OSHKOSH-NEENAH WI (2012)	5	0.8%	0%	0%	15.8%	0%	66.6%	80%	17.7%	20%	N/A	N/A	N/A	N/A
SHEBOYGAN WI (2008-2011)	1	0.2%	0%	0%	16.2%	100%	71%	0%	12.8%	0%	0%	16%	70.6%	13.4%
SHEBOYGAN WI (2012)	2	0.3%	0%	0%	30%	50%	62.7%	50%	7.3%	0%	N/A	N/A	N/A	N/A

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA			
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Geography*						
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp			
Full Review:																	
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	25	67.6%	0%	0%	6%	4%	63.5%	88%	30.5%	8%	0%	4.3%	55.4%	40.2%			
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2012)	12	32.4%	0%	0%	8.4%	0%	62.3%	100%	29.3%	0%	N/A	N/A	N/A	N/A			

* Based on 2008 through 2011 Peer Small Business Data: US. Peer Data for 2012 not available as of report date.

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

*** Source Data - Dun and Bradstreet 2008 through 2012.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending*			
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
APPLETON WI (2008-2011)	78	3.1%	13.8%	16.5%	20.1%	38.5%	30.8%	18%	35.3%	27%	18.4%	30.1%	26.1%	25.5%
APPLETON WI (2012)	28	1.1%	16.5%	28.6%	19.2%	25%	26.2%	25%	38.1%	21.4%	N/A	N/A	N/A	N/A
EAU CLAIRE WI (2008-2011)	271	10.9%	16.3%	16.5%	20.2%	31.2%	26.3%	22.2%	37.3%	30.1%	13.3%	28.5%	27.2%	31%
EAU CLAIRE WI (2012)	106	4.2%	19%	17.9%	19.1%	34%	23.8%	12.3%	38.1%	35.9%	N/A	N/A	N/A	N/A
GREEN BAY WI (2008-2011)	340	13.6%	15.6%	11.8%	18.1%	25.4%	26.8%	27%	39.5%	35.8%	14.3%	30.2%	27.3%	28.3%
GREEN BAY WI (2012)	94	3.8%	18.4%	22.3%	17.9%	23.4%	23.3%	26.6%	40.5%	27.7%	N/A	N/A	N/A	N/A
MADISON WI (2008-2011)	81	3.2%	15.6%	15%	19.1%	30.7%	28.5%	20.6%	36.9%	33.6%	11%	27.8%	28.6%	32.7%
MADISON WI (2012)	21	0.8%	18.4%	14.3%	18%	23.8%	24.9%	42.9%	38.8%	19.1%	N/A	N/A	N/A	N/A
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	621	24.9%	19.8%	12%	17.9%	27.4%	23.6%	19.9%	38.7%	40.8%	10%	26.6%	27.1%	36.4%
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	209	8.4%	22.1%	16.8%	16.9%	22.2%	20.6%	21.7%	40.4%	39.4%	N/A	N/A	N/A	N/A
RACINE WI (2008-2011)	82	3.3%	17.8%	15.5%	18.5%	26.3%	25.7%	23.6%	38%	34.6%	12.5%	30.3%	26.4%	30.8%
RACINE WI (2012)	15	0.6%	20.7%	33.3%	16.9%	6.7%	23%	13.3%	39.4%	46.7%	N/A	N/A	N/A	N/A

* Based on 2008 through 2011 Peer Mortgage Data: WISCONSIN Region. Peer Data for 2012 not available as of report date.

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

*** Percentage of Families is based on the 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

**** As a percentage of loans with borrower income information available. No information was available for 4% in 2008, 2.5% in 2009, 0.4% in 2010, 2.6% in 2011, and 1.3% in 2012 of loans originated and purchased by Bank.

WI NONMETROPOLITAN (2008-2011)	279	11.2%	16%	8.4%	19.3%	22.3%	26.6%	22.8%	38.1%	46.4%	11.1%	24.5%	24.6%	39.8%
WI NONMETROPOLITAN (2012)	94	3.8%	18.4%	13%	19.2%	25%	23.8%	20.7%	38.5%	41.3%	N/A	N/A	N/A	N/A
Limited Review:														
FOND DU LAC WI (2008-2011)	13	0.5%	14.4%	6.3%	18.7%	27.1%	31.6%	25%	35.3%	16.7%	14.6%	31.2%	28.6%	25.6%
FOND DU LAC WI (2012)	5	0.2%	17.5%	20%	18.6%	40%	26.9%	20%	37%	20%	N/A	N/A	N/A	N/A
JANESVILLE WI (2008-2011)	34	1.4%	16%	11%	20%	26.7%	26.4%	25.3%	37.6%	37%	18.6%	30%	27.8%	23.6%
JANESVILLE WI (2012)	20	0.8%	19.7%	25%	18.5%	30%	22.3%	35%	39.5%	10%	N/A	N/A	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL-WI (2008-2011)	47	1.9%	27.4%	29.3%	23.3%	26.3%	26.2%	6.6%	23.1%	37.9%	26.8%	30.5%	22.7%	20%
LAKE COUNTY- KENOSHA COUNTY IL-WI (2012)	10	0.4%	29.8%	50%	21.3%	10%	23.8%	20%	25.1%	20%	N/A	N/A	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	15	0.6%	15.7%	12.5%	19.7%	45.8%	28%	18.1%	36.6%	23.6%	16.2%	29.3%	26.5%	27.9%
OSHKOSH-NEENAH WI (2012)	8	0.3%	18%	12.5%	18.4%	50%	25.6%	0%	38%	37.5%	N/A	N/A	N/A	N/A
SHEBOYGAN WI (2008-2011)	21	0.8%	14.7%	20.8%	19.4%	14.6%	29.3%	14.6%	36.6%	50%	14.7%	31.2%	27.1%	27%
SHEBOYGAN WI (2012)	3	0.1%	18.5%	0%	18.9%	0%	25.1%	33.3%	37.5%	66.7%	N/A	N/A	N/A	N/A

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA			
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending*				
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
Full Review:															
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	82	77.4%	13%	13.9%	17.7%	27.9%	27.8%	32.7%	41.5%	25.5%	16.8%	29.5%	24.7%	29%	
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2012)	24	22.6%	14.5%	0%	17.7%	16.7%	25.2%	54.2%	42.6%	29.2%	N/A	N/A	N/A	N/A	

* Based on 2008 through 2011 Peer Mortgage Data : MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE Region. Peer Data not available for 2012 as of report date.

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

*** Percentage of Families is based on the 2000 Census information (for loans originated 2008-2011) and 2010 Census information (for loans originated 2012).

**** As a percentage of loans with borrower income information available. No information was available for 4% in 2008, 2.5% in 2009, 0.4% in 2010, 2.6% in 2011, and 1.3% in 2012 of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending*			
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
APPLETON WI (2008-2011)	78	5.1%	13.8%	7.6%	20.1%	29.2%	30.8%	41.4%	35.3%	21.8%	10.1%	22.3%	32.8%	34.8%
APPLETON WI (2012)	24	1.6%	16.5%	12.5%	19.2%	20.8%	26.2%	45.8%	38.1%	20.8%	N/A	N/A	N/A	N/A
EAU CLAIRE WI (2008-2011)	209	13.7%	16.3%	4.3%	20.2%	20.9%	26.3%	31.4%	37.3%	43.4%	11.6%	19.7%	29.4%	39.3%
EAU CLAIRE WI (2012)	94	6.2%	19%	8.5%	19.1%	11.7%	23.8%	20.2%	38.1%	59.6%	N/A	N/A	N/A	N/A
GREEN BAY WI (2008-2011)	199	13%	15.6%	8.8%	18.1%	15.7%	26.8%	34.5%	39.5%	41%	9.8%	20.3%	28.8%	41.1%
GREEN BAY WI (2012)	45	2.9%	18.4%	11.6%	17.9%	25.6%	23.3%	30.2%	40.5%	32.6%	N/A	N/A	N/A	N/A
MADISON WI (2008-2011)	27	1.8%	15.6%	7.7%	19.1%	11.4%	28.5%	49.6%	36.9%	31.3%	9.4%	22.4%	29.9%	38.3%
MADISON WI (2012)	10	0.7%	18.4%	20%	18%	20%	24.9%	40%	38.8%	20%	N/A	N/A	N/A	N/A
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	238	15.6%	19.8%	10.2%	17.9%	20%	23.6%	32%	38.7%	37.8%	10.1%	20.2%	28.2%	41.5%
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	57	3.7%	22.1%	8.9%	16.9%	35.7%	20.6%	25%	40.4%	30.4%	N/A	N/A	N/A	N/A
RACINE WI (2008-2011)	28	1.8%	17.8%	9%	18.5%	35.6%	25.7%	24.9%	38%	30.6%	10.5%	23.3%	26.5%	39.7%
RACINE WI (2012)	7	0.5%	20.7%	14.3%	16.9%	57.1%	23%	0%	39.4%	28.6%	N/A	N/A	N/A	N/A

* Based on 2008 through 2011 Peer Mortgage Data: WISCONSIN Region. Peer data for 2012 not available as of report date.

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

*** Percentage of Families is based on the 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

**** As a percentage of loans with borrower income information available. No information was available for 2.1% in 2008, 1.2% in 2009, 1.4% in 2010, 2.2% in 2011, and 1.6% in 2012 of loans originated and purchased by Bank.

WI NONMETROPOLITAN (2008-2011)	351	23%	16%	4.7%	19.3%	19.8%	26.6%	36.4%	38.1%	39.1%	10.3%	20.1%	28.6%	41%
WI NONMETROPOLITAN (2012)	93	6.1%	18.4%	9.9%	19.2%	22%	23.8%	34.1%	38.5%	34.1%	N/A	N/A	N/A	N/A
Limited Review:														
FOND DU LAC WI (2008-2011)	3	0.2%	14.4%	66.7%	18.7%	0%	31.6%	33.3%	35.3%	0%	10.4%	23.9%	33.3%	32.3%
FOND DU LAC WI (2012)	3	0.2%	17.5%	0%	18.6%	66.7%	26.9%	33.3%	37%	0%	N/A	N/A	N/A	N/A
JANESVILLE WI (2008-2011)	16	1.0%	16%	12.5%	20%	12.5%	26.4%	37.9%	37.6%	37.1%	13.9%	23.8%	28.1%	34.3%
JANESVILLE WI (2012)	4	0.3%	19.7%	25%	18.5%	0%	22.3%	0%	39.5%	75%	N/A	N/A	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL-WI (2008-2011)	4	0.3%	27.4%	25%	23.3%	25%	26.2%	25%	23.1%	25%	26.8%	30.3%	27%	15.9%
LAKE COUNTY- KENOSHA COUNTY IL-WI (2012)	1	0.1%	29.8%	0%	21.3%	0%	23.8%	100%	25.1%	0%	N/A	N/A	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	14	0.9%	15.7%	4.2%	19.7%	29.2%	28%	35.4%	36.6%	31.3%	8.9%	21.6%	29%	40.5%
OSHKOSH-NEENAH WI (2012)	3	0.2%	18%	0%	18.4%	33.3%	25.6%	66.7%	38%	0%	N/A	N/A	N/A	N/A
SHEBOYGAN WI (2008-2011)	11	0.7%	14.7%	43.8%	19.4%	22.9%	29.3%	6.3%	36.6%	27.1%	11.8%	24.6%	33.7%	29.9%
SHEBOYGAN WI (2012)	7	0.5%	18.5%	0%	18.9%	16.7%	25.1%	66.7%	37.5%	16.7%	N/A	N/A	N/A	N/A

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA														
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012		Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending*				
MA/Assessment Area:	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
	Full Review:															
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	98	77.8%	13%	8.2%	17.7%	21.6%	27.8%	35.4%	41.5%	34.8%	10.2%	21.9%	28%	39.9%		
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2012)	28	22.2%	14.5%	10.7%	17.7%	10.7%	25.2%	32.1%	42.6%	46.4%	N/A	N/A	N/A	N/A		

* Based on 2008 through 2011 Peer Mortgage Data: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE Region. Peer data for 2012 not available as of report date.

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

*** Percentage of Families is based on the 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

**** As a percentage of loans with borrower income information available. No information was available for 2.1% in 2008, 1.2% in 2009, 1.4% in 2010, 2.2% in 2011, and 1.6% in 2012 of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending*								
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp					
Full Review:																			
APPLETON WI (2008-2011)	420	3.5%	13.8%	11.7%	20.1%	29.3%	30.8%	29.2%	35.3%	29.8%	8.1%	22.4%	30.6%	39%					
APPLETON WI (2012)	222	1.9%	16.5%	14.2%	19.2%	21.9%	26.2%	34.3%	38.1%	29.7%	N/A	N/A	N/A	N/A					
EAU CLAIRE WI (2008-2011)	1,169	9.7%	16.3%	8.3%	20.2%	18.6%	26.3%	26.1%	37.3%	47%	7.7%	20.1%	28.7%	43.5%					
EAU CLAIRE WI (2012)	392	3.3%	19%	6.5%	19.1%	19.4%	23.8%	29.5%	38.1%	44.6%	N/A	N/A	N/A	N/A					
GREEN BAY WI (2008-2011)	1,573	13.1%	15.6%	6.6%	18.1%	21.7%	26.8%	33.6%	39.5%	38.2%	6.9%	20.1%	28%	44.9%					
GREEN BAY WI (2012)	624	5.2%	18.4%	8.9%	17.9%	22.6%	23.3%	30.7%	40.5%	37.7%	N/A	N/A	N/A	N/A					
MADISON WI (2008-2011)	420	3.5%	15.6%	8.5%	19.1%	20%	28.5%	31.2%	36.9%	40.4%	6.9%	21.1%	29.9%	42.2%					
MADISON WI (2012)	112	0.9%	18.4%	10.7%	18%	27.7%	24.9%	22.3%	38.8%	39.3%	N/A	N/A	N/A	N/A					
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	2,731	22.8%	19.8%	7%	17.9%	18.2%	23.6%	27.5%	38.7%	47.3%	5.5%	17.3%	27.2%	50%					
MILWAUKEE-WAUKESHA-WEST ALLIS (2012)	861	7.2%	22.1%	7.1%	16.9%	19.7%	20.6%	24.2%	40.4%	49%	N/A	N/A	N/A	N/A					
RACINE WI (2008-2011)	250	2.1%	17.8%	7.4%	18.5%	19.4%	25.7%	27.9%	38%	45.3%	7.5%	20.5%	29%	42.9%					
RACINE WI (2012)	65	0.5%	20.7%	3.1%	16.9%	26.2%	23%	20%	39.4%	50.8%	N/A	N/A	N/A	N/A					

* Based on 2008 through 2011 Peer Mortgage Data: WISCONSIN Region. Peer Data for 2012 not available as of report date.

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

*** Percentage of Families is based on the 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

**** As a percentage of loans with borrower income information available. No information was available for 3.2% in 2008, 1.5% in 2009, 1.8% in 2010, 1.4% in 2011, and 1.5% in 2012 of loans originated and purchased by Bank.

WI NONMETROPOLITAN (2008-2011)	1,775	14.8%	16%	6.9%	19.3%	18.6%	26.6%	30.8%	38.1%	43.8%	6.2%	17.6%	27.1%	49%
WI NONMETROPOLITAN (2012)	705	5.9%	18.4%	6.1%	19.2%	19.1%	23.8%	29%	38.5%	45.8%	N/A	N/A	N/A	N/A
Limited Review:														
FOND DU LAC WI (2008-2011)	67	0.6%	14.4%	9.3%	18.7%	27.5%	31.6%	28.3%	35.3%	34.8%	7.6%	22.9%	31%	38.5%
FOND DU LAC WI (2012)	31	0.3%	17.5%	9.7%	18.6%	25.8%	26.9%	38.7%	37%	25.8%	N/A	N/A	N/A	N/A
JANESVILLE WI (2008-2011)	187	1.6%	16%	12.4%	20%	20.3%	26.4%	29.9%	37.6%	37.4%	8.9%	22.2%	31.1%	37.8%
JANESVILLE WI (2012)	55	0.5%	19.7%	13%	18.5%	16%	22.3%	33.3%	39.5%	37%	N/A	N/A	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL-WI (2008-2011)	85	0.7%	27.4%	11.9%	23.3%	35.4%	26.2%	15%	23.1%	37.6%	16.5%	27.6%	28.4%	27.6%
LAKE COUNTY- KENOSHA COUNTY IL-WI (2012)	15	0.1%	29.8%	13.3%	21.3%	33.3%	23.8%	6.7%	25.1%	46.7%	N/A	N/A	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	71	0.6%	15.7%	10.4%	19.7%	13.7%	28%	25.2%	36.6%	50.7%	7.5%	20.8%	28%	43.7%
OSHKOSH-NEENAH WI (2012)	59	0.5%	18%	3.5%	18.4%	17.2%	25.6%	31%	38%	48.3%	N/A	N/A	N/A	N/A
SHEBOYGAN WI (2008-2011)	85	0.7%	14.7%	9.7%	19.4%	30.8%	29.3%	24%	36.6%	35.5%	7.3%	23.3%	31.5%	37.9%
SHEBOYGAN WI (2012)	30	0.2%	18.5%	3.5%	18.9%	27.6%	25.1%	27.6%	37.5%	41.4%	N/A	N/A	N/A	N/A

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA													
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending*				
	#	% of Total**	% Families***	% BANK Loans*** *	% Families****	% BANK Loans****	% Families***	% BANK Loans****	% Families****	% BANK Loans****	Low	Mod	Mid	Upp	
Full Review:															
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	603	75.2%	13%	9.4%	17.7%	28.2%	27.8%	33.3%	41.5%	29.2%	8.1%	21.5%	29.2%	41.2%	
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2012)	199	24.8%	14.5%	7.1%	17.7%	24.4%	25.2%	33%	42.6%	35.5%	N/A	N/A	N/A	N/A	

* Based on 2008 through 2011 Peer Mortgage Data: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE Region. Peer Data for 2012 not available as of report date.

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

*** Percentage of Families is based on the 2000 Census information (loans originated 2008-2011) and 2010 Census information (loans originated 2012).

**** As a percentage of loans with borrower income information available. No information was available for 3.2% in 2008, 1.5% in 2009, 1.8% in 2010, 1.4% in 2011, and 1.5% in 2012 of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: WISCONSIN			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
APPLETON WI (2008-2011)	14	2.1%	69.2%	78.6%	8	5	1	16,990	5,853
APPLETON WI (2012)	12	1.8%	74.2%	50%	5	2	5	N/A	N/A
EAU CLAIRE WI (2008-2011)	40	6.1%	69.9%	90%	26	11	3	9,581	3,440
EAU CLAIRE WI (2012)	24	3.6%	75.4%	66.7%	8	10	6	N/A	N/A
GREEN BAY WI (2008-2011)	84	13.2%	69.2%	64.3%	55	21	8	22,113	7,929
GREEN BAY WI (2012)	34	5.1%	71.2%	50%	15	11	8	N/A	N/A
MADISON WI (2008-2011)	8	1.2%	69.8%	50%	7	0	1	41,518	14,770
MADISON WI (2012)	8	1.2%	70.2%	62.5%	7	1	0	N/A	N/A
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2008-2011)	140	21.2%	69.9%	49.3%	53	44	43	119,749	41,489
MILWAUKEE-WAUKESHA-WEST ALLIS WI (2012)	123	18.6%	70.6%	45.5%	48	37	38	N/A	N/A
RACINE WI (2008-2011)	9	1.4%	71.6%	77.8%	6	1	2	12,344	4,560
RACINE WI (2012)	3	0.5%	72.4%	100%	2	1	0	N/A	N/A
WI NONMETROPOLITAN (2008-2011)	87	13.2%	72.3%	78.2%	44	23	20	39,201	16,909

* Based on 2008 through 2011 Peer Small Business Data: US. Peer Small Business Data not available for 2012 as of report date.

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2008-2012).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0% of small loans to businesses originated and purchased by the Bank.

WI NONMETROPOLITAN (2012)	34	5.1%	77.8%	85.3%	18	9	7	N/A	N/A
Limited Review:									
FOND DU LAC WI (2008-2011)	2	0.3%	70.4%	50%	0	0	2	7,557	3,578
FOND DU LAC WI (2012)	1	0.2%	74.9%	100%	0	0	1	N/A	N/A
JANESVILLE WI (2008- 2011)	2	0.3%	70.9%	100%	1	0	1	8,388	2,909
JANESVILLE WI (2012)	5	0.8%	72.6%	60%	4	1	0	N/A	N/A
LAKE COUNTY- KENOSHA COUNTY IL- WI (2008-2011)	3	0.5%	71.2%	66.7%	3	0	0	10,409	3,438
LAKE COUNTY- KENOSHA COUNTY IL- WI (2012)	4	0.7%	72.7%	50%	3	1	0	N/A	N/A
OSHKOSH-NEENAH WI (2008-2011)	16	2.4%	68.6%	43.8%	9	5	2	10,105	3,241
OSHKOSH-NEENAH WI (2012)	5	0.8%	72.3%	40%	1	1	3	N/A	N/A
SHEBOYGAN WI (2008- 2011)	1	0.2%	71.2%	100%	1	0	0	8,935	4,141
SHEBOYGAN WI (2012)	2	0.3%	72.9%	100%	2	0	0	N/A	N/A

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA				
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
MINNEAPOLIS-ST. PAUL-BLOOMINGTON (2008-2011)	25	67.6%	74.9%	88%	21	3	1	31,454	14,383
MINNEAPOLIS-ST. PAUL- BLOOMINGTON (2012)	12	32.4%	76.7%	75%	8	4	0	N/A	N/A

* Based on 2008 through 2011 Peer Small Business Data: US. Peer Small Business Data not available for 2012 as of report date.

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2008-2012).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WISCONSIN		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
APPLETON WI MSA	0	0	4	***	4	***	***	0	0
EAU CLAIRE WI MSA	0	0	13	\$4	13	\$4	***	0	0
GREEN BAY WI MSA	0	0	31	\$42	31	\$42	0.5%	0	0
MADISON WI MSA	0	0	1	\$8,100	1	\$8,100	97.3%	0	0
MILWAUKEE- WAUKESHSA-WEST ALLIS WI MSA	0	0	32	\$135	32	\$135	1.6%	0	0
RACINE WI MSA	0	0	3	\$2	3	\$2	***	0	0
WI NONMETROPOLITAN AA	0	0	8	\$2	8	\$2	***	0	0
WI STATEWIDE	0	0	17	\$39	17	\$39	0.5%	0	0
***Dollar amount is less than \$1,000 or percentage of total dollars is less than 1/10 of 1 percent.									

* '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.

Limited Review:									
FOND DU LAC WI MSA	0	0	0	0	0	0	0	0	0
JANESVILLE WI MSA	0	0	0	0	0	0	0	0	0
LAKE COUNTY- KENOSHA COUNTY IL- WI MA	0	0	0	0	0	0	0	0	0
OSHKOSH-NEENAH WI MSA	0	0	0	0	0	0	0	0	0
SHEBOYGAN WI MSA	0	0	0	0	0	0	0	0	0

QUALIFIED INVESTMENTS Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MSA	0	0	2	***	2	***	100%	0	0

***Dollar amount is less than \$1,000.

* '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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WISCONSIN Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
APPLETON WI MSA	2.7%	4	5.5%	0%	25%	75%	0%	0	0	0	0	0	0	0%	7%	75%	18%
EAU CLAIRE WI MSA	6.8%	9	12.3%	0%	33.3%	66.7%	0%	0	1	0	0	-1	0	0%	12.2%	71.3%	16.5%
GREEN BAY WI MSA	12.2%	8	11%	0%	12.5%	75%	12.5%	0	0	0	0	0	0	1.8%	19.4%	49.6%	28.8%
MADISON WI MSA	3.7%	5	6.8%	0%	60%	40%	0%	0	0	0	0	0	0	6.2%	15%	57.1%	21.1%
MILWAUKEE-WAUKESHA-WEST ALLIS WI MSA	52.2%	23	31.5%	0%	17.4%	47.8%	34.8%	0	0	0	0	0	0	14.7%	16.2%	36.1%	33%
RACINE WI MSA	1.2%	2	2.7%	0%	0%	50%	50%	0	0	0	0	0	0	4.7%	14.3%	53.5%	27.5%
WI NONMETROPOLITAN AA	15.5%	16	21.9%	0%	6.3%	93.7%	0%	0	1	0	-1	0	0	0%	9.4%	82.4%	8.2%
Limited Review:																	

FOND DU LAC WI MSA	1.2%	1	1.4%	0%	0%	100%	0%	0	0	0	0	0	0	0%	12.3%	79.1%	8.6%
JANESVILLE WI MSA	2.2%	1	1.4%	0%	100%	0%	0%	0	1	-1	0	0	0	8%	17.3%	51.8%	22.9%
LAKE COUNTY- KENOSHA COUNTY IL-WI MA	0.6%	1	1.4%	0%	0%	100%	0%	0	0	0	0	0	0	16.4%	29.5%	54.1%	0%
OSHKOSH-NEENAH WI MSA	0.4%	1	1.4%	0%	100%	0%	0%	0	0	0	0	0	0	0%	16.3%	67.1%	16.6%
SHEBOYGAN WI MSA	1.2%	2	2.7%	0%	100%	0%	0%	0	0	0	0	0	0	0%	23.4%	69.5%	7%

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MULTISTATE AA																	
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MINNEAPOLIS-ST. PAUL-BLOOMINGTON MN-WI MSA	100%	3	100%	0%	0%	100%	0%	0	0	0	0	0	0	0%	7.5%	63.6%	28.3%

