



PUBLIC DISCLOSURE

November 5, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Peshtigo National Bank
Charter Number 5658

250 French Street
Peshtigo, WI 54157

Office of the Comptroller of the Currency

Milwaukee Field Office
1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226

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

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Overall CRA Rating: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors supporting the institution's rating include:

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

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 MA/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 generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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 conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), 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 five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above 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 Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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) 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

The Peshtigo National Bank (PNB) is a \$194.6 million intrastate financial institution headquartered in Peshtigo, Wisconsin. The bank is 100 percent owned by Peshtigo National Bancorporation, Inc., a one-banking holding company headquartered in Peshtigo, Wisconsin.

The main office is located in a middle-income census tract (CT). The bank operates four full service branches in addition to the main office. The Gillett, Wisconsin branch is located in a moderate-income CT, while all other branches are located in middle-income CTs. No branches have opened or closed during the evaluation period. All locations have Automated Teller Machines.

PNB offers traditional community bank products and services, and its total loan portfolio represents 57.31 percent of total assets. By dollar volume, the loan portfolio consists of 40.79 percent agricultural loans, 33.55 percent residential real estate loans, 21.80 percent commercial loans, and 3.86 percent consumer loans. Tier 1 capital totals \$23.2 million. All financial information is as of September 30, 2018.

PNB has two AAs, including one AA in a Metropolitan Statistical Area (MSA). The MSA AA consists of Oconto County, which is part of the Green Bay MSA. The non-MSA AA includes all of Marinette County and a portion of Shawano County. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AA. PNB was evaluated using the Small Bank procedures and received a Satisfactory rating at its prior CRA examination dated June 17, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

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

This evaluation covers the period since the prior CRA examination, June 17, 2013, through November 5, 2018. The Lending Test evaluated loans originated between January 1, 2015 and December 31, 2017.

In order to provide more current and accurate demographic data, the federal banking agencies are now updating census data every five years instead of ten, beginning with the Census Bureau's 2015 American Community Survey (ACS). PNB's AAs were affected by this change and the data from 2015 through 2016 received a separate

analysis from the lending data from 2017. As a result, performance tables have been separated and include 2015 through 2016 analysis only. Data is discussed in the applicable narrative sections of the evaluation.

To evaluate small farm lending, we used data from bank reports and a random sample of small farm loans originated in the bank's AA. We also evaluated home mortgage loans, which included home purchase, home improvement, and home refinance loans reported under the Home Mortgage Disclosure Act (HMDA). Our lending analysis utilized the most recent available demographic and aggregate peer lending data.

Data Integrity

The bank reports data under the requirements of the HMDA. Prior to conducting this evaluation, we tested the accuracy of the bank's HMDA data for 2015, 2016, and 2017. This data was found to be reliable. Therefore, the reported HMDA data was used in our evaluation of home mortgage lending.

Selection of Areas for Full-Scope Review

We selected the Non-MSA AA for a full-scope review. At the previous evaluation, we performed a full-scope review of the Oconto County AA. As a result, a full-scope review of the Oconto County AA was not completed during this evaluation. Conclusions were based on analysis of small farm and home mortgage loans in the Non-MSA AA as these products represent a majority of the bank's lending activities.

Ratings

The bank's overall rating is based primarily on the area that received a full-scope review.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

The conclusions of PNB's performance were based on the bank's Non-MSA AA. We considered the Lending Test when assigning the bank's overall performance evaluation rating. For the Lending Test, more weight was placed on the bank's record of small farm lending compared to its home mortgage lending during the evaluation period.

LENDING TEST

The Lending Test is rated Satisfactory.

Loan-to-Deposit Ratio

PNB's LTD ratio is reasonable given the bank's size, financial condition, and the credit needs of its AA. The bank's quarterly LTD ratio averaged 73.33 percent over the 21 quarters spanning the second quarter of 2013 to the second quarter of 2018. The peer group consists of banks with total assets ranging from \$23.6 million to \$513.6 million. The average LTD ratio for the other banks located in the AA over the same period ranged from 38.78 percent to 88.51 percent.

Lending in Assessment Area

PNB originated a substantial majority of its small farm and home mortgage loans inside its AAs. A review of the primary loan products shows that 89.8 percent by number and 89.7 percent by dollar volume were made to farms and individuals located within the bank's AAs.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	112	88.9	14	11.1	126	9,026	88.2	1,212	11.8	10,238
2016	87	81.3	20	18.7	107	9,670	81.6	2,175	18.4	11,845
2017	88	90.7	9	9.3	97	9,279	95.4	448	4.6	9,727
Subtotal	287	87.0	43	13.0	330	27,975	88.0	3,835	12.00	31,810
Small Farms										
2015-2016	50	100.0	0	0.0	50	3,191	100.0	0	0.0	3,191
2017	40	100.0	0	0.0	40	2,372	100.0	0	0.0	2,372
Subtotal	90	100.0	0	0.0	90	5,563	100.0	0	0.0	5,563
Total	377	89.8	43	10.2	420	33,538	89.7	3,835	10.3	37,373
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data and Loan Sampling for 2015-2017 Due to rounding, totals may not equal 100.0</i>										

Lending to Borrowers of Different Incomes and to Farms of Different Sizes

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

The borrower distribution of loans reflects reasonable distribution among farms of different sizes. The bank originated 80.0 percent of its farm loans to AA small farms (farms with gross annual revenues of \$1.0 million or less). The percentage of farm loans to small farms is less than the percentage of small farms in the AA, which is 96.5 percent. The percentage of bank loans to small farms exceeds aggregate lending data which shows 37.0 percent of peer farm lending in the AA was to small farms.

Refer to table T in appendix C for the facts and data used to evaluate the borrower distribution of the bank’s origination of loans to farms.

The borrower distribution of home mortgage loans within the AA reflects excellent distribution among borrowers of different incomes. The bank originated 11.2 percent of its home mortgages to low-income families, which is less than the demographics that show 21.6 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate lending data which shows 7.8 percent of peer lending within the AA was to low-income families. The bank originated 25.2 percent of home mortgages to moderate-income families, which exceeds the demographics that show 20.9 percent of families in the AA are moderate-income. The

bank also exceeds the aggregate lending data which shows 18.7 percent of peer lending within the AA was to moderate-income families.

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

Based on the limited-scope review, the bank's performance regarding borrower distribution among individuals of different income levels and farms of different sizes is not inconsistent with the bank's overall performance in the full-scope review. The bank's lending performance for individuals of different income levels is less than the demographics, but exceeds peer aggregate lending in the Oconto County AA. The bank's lending performance for farms of different sizes is slightly less than the demographics, but exceeds the peer aggregate lending and is considered reasonable.

Geographic Distribution of Loans

The geographic distribution of farms loans reflects reasonable distribution among geographies. The geographic distribution of home mortgage loans reflects poor distribution among geographies.

The geographic distribution of farm loans reflects reasonable distribution among geographies. There are no low-income CTs in the AA. The bank originated 8.0 percent of small farm loans in moderate-income geographies. This percentage is less than the demographics, which show 16.4 percent of AA farms are in moderate-income geographies. The percentage of bank loans is also less than the aggregate lending data, which shows 12.6 percent of peer lending was to farms in moderate-income geographies. The bank originated 25 farm loans totaling \$4.6 million in moderate-income CTs that were not included in our sample. Therefore, the bank's performance in moderate-income CTs is considered reasonable.

Refer to table S in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination of loans to farms.

The geographic distribution of home mortgage loans reflects poor distribution among geographies. There are no low-income CTs in the AA. The bank originated 15.0 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's originated loans is less than the demographics that show 31.5 percent of owner-occupied housing is in moderate-income geographies. The percentage of bank loans is also less than aggregate lending data which shows 34.6 percent of peer home mortgage lending was in moderate-income geographies.

Refer to table O in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

Based on the limited-scope review, the bank's performance regarding geographic distribution among individuals of different income levels is stronger than the findings

under the full-scope review. The bank's performance regarding farms of different sizes under the limited-scope review is not inconsistent with the full-scope review findings. In the Oconto County AA, the bank's lending performance for individuals of different income levels exceeds the demographics and peer aggregate lending, while lending performance for farms of different sizes is less than the demographics and peer aggregate lending.

Responses to Complaints

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

Appendix A: Scope of Examination

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: 01/01/15 to 12/31/17	
Financial Institution		Products Reviewed
The Peshtigo National Bank (PNB) Peshtigo, WI		Agricultural Loans Home Mortgage Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None included in review.		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Non-MSA	Full-Scope	All of Marinette County and part of Shawano County.
Green Bay, WI MSA	Limited-scope	All of Oconto County

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Peshtigo Non-MSA AA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	31.25	62.50	6.25	0.0
Population by Geography	54,135	0.0	28.15	66.64	5.21	0.0
Housing Units by Geography	36,036	0.0	46.26	50.07	3.67	0.0
Owner-Occupied Units by Geography	18,793	0.0	31.54	62.37	6.09	0.0
Occupied Rental Units by Geography	5,480	0.0	29.62	69.49	0.89	0.0
Vacant Units by Geography	11,763	0.0	77.53	21.38	1.09	0.0
Businesses by Geography	2,643	0.0	22.21	73.17	4.62	0.0
Farms by Geography	316	0.0	17.41	79.43	3.16	0.0
Family Distribution by Income Level	15,916	21.61	20.86	23.01	34.53	0.0
Household Distribution by Income Level	24,273	25.78	18.28	19.73	36.22	0.0
Median Family Income Non-MSAs - WI		\$57,005	Median Housing Value			\$116,720
			Median Gross Rent			\$558
			Families Below Poverty Level			9.48%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.00</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Peshtigo NB Non-MSA AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	17.65	76.47	0.0	5.88
Population by Geography	53,451	0.0	15.98	84.02	0.0	0.0
Housing Units by Geography	36,573	0.0	27.25	72.75	0.0	0.0
Owner-Occupied Units by Geography	17,978	0.0	17.77	82.23	0.0	0.0
Occupied Rental Units by Geography	5,220	0.0	13.97	86.03	0.0	0.0
Vacant Units by Geography	13,375	0.0	45.17	54.83	0.0	0.0
Businesses by Geography	2,721	0.0	10.99	89.01	0.0	0.0
Farms by Geography	292	0.0	9.25	90.75	0.0	0.0
Family Distribution by Income Level	14,834	18.91	21.78	25.11	34.20	0.0
Household Distribution by Income Level	23,198	24.33	18.29	20.01	37.37	0.0
Median Family Income Non-MSAs - WI		\$60,911	Median Housing Value			\$119,500
			Median Gross Rent			\$637
			Families Below Poverty Level			7.73%
<i>Source: 2015 ACS Census and 2017 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.00</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

PNB has two AAs, including one AA in an MSA. The MSA AA consists of Oconto County, which is part of the Green Bay MSA. The Non-MSA AA includes all of Marinette County and a portion of Shawano County. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

According to 2010 US Census Data, the bank’s AA is comprised of 16 CTs, of which zero are low-income, five (31.25 percent) are moderate-income, 10 (62.50 percent) are middle-income, and one (6.25 percent) is upper-income. The total population of the AA is 54,135, which is comprised of 15,916 families. The number of families at each income level is: 3,439 low-income families (21.61 percent), 3,320 moderate-income families (20.86 percent), 3,662 middle-income families (23.01 percent), and 5,495 upper-income families (34.53 percent). The average median family income is \$51,917, and the FFIEC 2016 updated MSA median family income is \$60,200. The percentage of families below the poverty level is 9.48 percent. Owner-occupied units comprise 52.15 percent of total housing units. Based on 2016 demographic data, the total number of farms with reported revenues in this AA was 316. Of these farms, 305 (96.52 percent) had gross revenues of \$1 million or less, 10 (3.16 percent) had gross revenues over \$1 million, and one (0.32 percent) did not report revenue.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 17 CTs, of which zero are low-income, three (17.65 percent) are moderate-income, 13 (76.47 percent) are middle-income, and zero are upper-income. There is one (5.88 percent) CT designated as NA. The total population of the AA is 53,451, which is comprised of 14,834 families. The number of families at each income level is: 2,805 low-income families (18.91 percent), 3,231 moderate-income families (21.78 percent), 3,725 middle-income families (25.11 percent), and 5,073 upper-income families (34.20 percent). The average median family income is \$56,530, and the FFIEC 2017 updated MSA median family income is \$62,600. The percentage of families below the poverty level is 7.73 percent. Owner-occupied units comprise 49.16 percent of total housing units. Based on 2017 demographic data, the total number of farms with reported revenues in this AA was 292. Of these farms, 281 (96.23 percent) had gross revenues of \$1 million or more, 10 (3.42 percent) had gross revenues over \$1 million, and one (0.35 percent) did not report revenue.

Marinette County's economy is stable overall. Most of the county's largest employers are located in the cities of Marinette, Peshtigo, Oconto Falls, Coleman, and Gillett. Major employers include Fincantieri Marinette Marine, the Bay Area Medical Center, Bellin Health, Acer Flooring, the Badger Paper Mill, Great Lakes Tool, and Sentinel Structures.

The annual unemployment rates as of July 2018 for Marinette and Shawano Counties were 4.3 percent and 3.0 percent, respectively. The annual unemployment rate for the State of Wisconsin during the same time period was 3.2 percent, which is higher than the unemployment rate for Shawano County but lower than that of Marinette County.

PNB has a continued commitment to serve the needs of its community and remains an integral financial partner in the communities it has served since 1901. The bank continues to grow and evolve in order to meet the needs of its customers and communities.

Competition from other financial institutions is strong. The bank ranks third behind The Stephenson National Bank (SNB) and Associated National Bank for deposit market share. The bank's deposit market share as of June 30, 2018 was 10.40 percent. Other competing financial institutions had a deposit market share ranging from 0.34 percent (Denmark State Bank) to 22.52 percent (SNB).

We performed one community contact with a former member of an economic development finance committee for the City of Peshtigo. Overall, the credit needs of the community are being identified and met. While companies have jobs available, there is a lack of potential job candidates possessing the skills and experience needed to fill them. Housing stock in the Peshtigo and Marinette areas is older, and programs are needed to revitalize and rehabilitate area housing.

Appendix C: 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; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$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. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table R. Assessment Area Distribution of Loans to Farms by Gross Annual Revenue** - 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. The table also presents aggregate peer data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms 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 farm. The table also presents aggregate peer data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2015-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Peshtigo Green Bay MSA AA 2016	92	8,850	46.2	1,796	0.0	0.0	0.0	43.2	45.7	44.5	56.8	54.3	55.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Peshtigo Non-MSA AA 2016	107	9,846	53.8	1,739	0.0	0.0	0.0	31.5	15.0	34.6	62.4	72.9	59.3	6.1	12.2	6.1	0.0	0.0	0.0	0.0
Total	199	18,696	100.0	3,535	0.0	0.0	0.0	36.4	29.1	39.6	60.0	64.3	57.4	3.5	6.5	3.0	0.0	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2015-16

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Peshtigo Green Bay MSA AA 2016	92	8,850	46.2	1,796	24.7	13.0	9.7	20.8	15.2	19.2	24.2	26.1	23.8	30.3	34.8	35.7	0.0	10.9	11.6
Peshtigo Non-MSA AA 2016	107	9,846	53.8	1,739	21.6	11.2	7.8	20.9	25.2	18.7	23.0	24.3	22.3	34.5	34.6	36.9	0.0	4.7	14.2
Total	199	18,696	100.0	3,535	22.9	12.1	8.8	20.8	20.6	19.0	23.5	25.1	23.1	32.8	34.7	36.3	0.0	7.5	12.9

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015-16
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Peshtigo Green Bay MSA AA 2016	25	1,203	50.0	49	0.0	0.0	0.0	36.9	28.0	34.7	63.1	72.0	65.3	0.0	0.0	0.0	0.0	0.0	0.0
Peshtigo Non-MSA AA 2016	25	1,988	50.0	127	0.0	0.0	0.0	16.4	8.0	12.6	80.2	92.0	83.5	3.4	0.0	3.9	0.0	0.0	0.0
Total	50	3,191	100.0	176	0.0	0.0	0.0	26.3	--	18.8	71.9	--	78.4	1.8	--	2.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2015-16
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Peshtigo Green Bay MSA AA 2016	25	1,203	50.0	49	98.0	96.0	36.7	1.4	4.0	0.7	0.0	
Peshtigo Non-MSA AA 2016	25	1,988	50.0	127	96.5	80.0	37.0	3.2	20.0	0.3	0.0	
Total	50	3,191	100.0	176	97.2	--	36.9	2.3	--	0.5	0.0	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.