

PUBLIC DISCLOSURE

August 12, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community First Bank
RSSD# 175140

925 Wisconsin Avenue
Boscobel, Wisconsin 53805

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S CRA RATING

Community First Bank is rated:	Satisfactory
The Lending Test is rated:	Satisfactory
The Community Development Test is rated:	Satisfactory

Community First Bank is meeting the credit needs of its community based on an analysis of the bank's lending and community development activities. The bank's loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area credit needs. A majority of the bank's loans were originated inside the bank's assessment area. The geographic dispersion of the bank's loans reflects a reasonable distribution of residential, small business and small farm lending in moderate-income census tracts, and loan distribution reflects reasonable penetration among low- and moderate-income borrowers and business and farms of different sizes. Neither Community First Bank nor this Reserve Bank received any Community Reinvestment Act (CRA)-related complaints during the evaluation period.

Community First Bank's community development test performance is also Satisfactory, consisting of qualified community development loans, investments, and services which demonstrate an adequate responsiveness to the needs of the bank's assessment area.

SCOPE OF EXAMINATION

Community First Bank's performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC) Intermediate Small Institution CRA Examination Procedures. The evaluation considered information about the bank such as asset size, financial condition and competition, and the economic and demographic characteristics of its assessment area. The evaluation included a full-scope review of the bank's single assessment area and reviewed residential, small business, and small farm lending performance based on a sample of those loans originated from January 1, 2023, through December 31, 2023. The bank's level of community development activity was also evaluated.

Performance within the designated assessment area was evaluated using intermediate-small bank examination procedures based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 12-quarter average loan-to-deposit ratio ending March 31, 2024, was calculated for the bank and compared to a sample of local competitors.
- ***Lending in the Assessment Area*** – Samples of the bank's home mortgage, small business, and small farm loans originated from January 1, 2023, through December 31, 2023, were reviewed to determine the percentage of loans originated within the assessment area.

- ***Geographic Distribution of Lending in the Assessment Area*** – A sample of the bank’s home mortgage, small business, and small farm loans originated within the assessment area, from January 1, 2023, through December 31, 2023, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as moderate-income (there are no low-income census tracts present in the bank’s assessment area).
- ***Lending to Borrowers of Different Income and to Businesses and Farms of Different Sizes*** – Samples of the bank’s home mortgage, small business, and small farm loans originated within the assessment area, from January 1, 2023, through December 31, 2023, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses and farms with different revenue sizes.
- ***Response to Substantiated Complaints*** – Complaints were reviewed to determine if any were related to the bank’s record of helping to meet community credit needs and its responses to any received were evaluated for appropriateness.
- ***Community Development Activities*** – The bank’s responsiveness to community development needs through community development loans, qualified investments, and community development services, from August 3, 2021, through August 12, 2024, was reviewed considering the capacity, need, and availability of such opportunities within the assessment area.

In addition, two community representatives were contacted in connection with the evaluation to provide information regarding local economic and socio-economic conditions in the assessment area. The following types of organizations were contacted: an organization providing services to low- and moderate-income individuals and an organization promoting economic development.

DESCRIPTION OF INSTITUTION

Community First Bank is the sole credit extending subsidiary of Boscobel Bancorp, Inc.; both organizations are headquartered in Boscobel, Wisconsin. In addition to the bank's main office and automated teller machine (ATM), there are an additional nine branch offices, and eight ATMs in the bank's physical footprint. All bank offices and ATMs are located in middle-income census tracts with one location in Crawford County, six locations in Grant County, one location in Richland County, and two locations in Sauk County. According to the Uniform Bank Performance Report (UBPR), Community First Bank reported total assets of \$592.8 million as of March 31, 2024. There have been no acquisitions, branch openings or closings since the previous evaluation.

As detailed in the following table, the bank's loan portfolio is comprised primarily of commercial and agricultural loans, as together they represent 70.7 percent of the bank's outstanding loans. In addition, the bank extends residential portfolio and secondary market loans and consumer open-end and closed-end loans.

Composition of Loan Portfolio as of March 31, 2024		
Type	\$(000s)	%
Commercial	164,111	42.2
Agriculture	111,058	28.5
Residential	71,566	18.4
Consumer	10,101	2.6
Other	32,240	8.3
Total	389,076	100.0

Note: Percentages may not total 100.0 percent due to rounding.

Deposit products include checking and savings accounts, and certificate of deposit products. According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Community First Bank ranked third out of 26 FDIC-insured institutions operating in the bank's assessment area. The bank held approximately \$505.1 million in deposits, representing a market share of 9.1 percent. The market leaders were Bank of Wisconsin Dells and Peoples State Bank, with 13.3 and 11.0 percent of market share, respectively. Online and mobile banking applications are also offered by the bank. The bank's website is located at www.cfbank.com.

There are no known legal, financial or other factors impeding the bank's ability to help meet the credit needs in its communities.

The bank was rated Satisfactory under the CRA at its previous evaluation conducted on August 2, 2021.

DESCRIPTION OF ASSESSMENT AREA

Community First Bank's single assessment area is comprised of 49 census tracts in total, consisting of 47 contiguous census tracts in Non-Metropolitan Statistical Area (MSA) Crawford, Grant, Richland and Sauk Counties, and two of the six census tracts in Iowa County, which is part of the four county Madison, WI MSA #31540.

Given the Iowa County tracts are contiguous to the non-MSA portion of the assessment area, and they do not extend substantially into the full MSA, they are included in the bank's single non-MSA assessment area. Three of 49 census tracts in the assessment area are moderate-income; two of these are in Iowa County and one is in Sauk County. There are no low-income census tracts in the assessment area. The remainder of the assessment area is comprised of 40 middle-income and six upper-income census tracts. None of the middle-income census tracts are designated as distressed or underserved.

Since the previous evaluation, the bank's assessment area has changed due to several factors. Non-MSA Lafayette County and the remaining four census tracts of Iowa County were removed from the assessment area due to low lending activity. Changes from the 2020 U.S. Census resulted in additional census tracts in Sauk County due to population growth resulting in tract splits. Finally, the income levels of the counties making up the assessment area changed in association with the most recent American Community Survey (ACS) completed by the U.S. Census Bureau. This change resulted in a different distribution of income levels among the census tracts utilized in the evaluation to determine census tract income and borrower income distributions.

The previous performance evaluation's tract income levels were based on 2011 – 2015 ACS income data, while the current evaluation's tract income levels are based on 2016 – 2020 ACS income data. As shown in the following table, the net result of these changes was a reduction in the number of moderate- and middle-income census tracts of one tract each, and an increase of upper-income census tracts of four tracts. In total, considering the elimination of the entirety of Lafayette County and a portion of Iowa County, coupled with the census tract splits discussed earlier, there was a net increase in assessment area tracts of two, for a total of 49 census tracts.

Census Tract Designation Changes American Community Survey Data (ACS)¹			
Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	0	0	0
Moderate	4	3	-1
Middle	41	40	-1
Upper	2	6	+4
Unknown	0	0	0
Total	47	49	+2

Source: U. S. Census Bureau: American Community Survey Data: 2011-2015 and 2016-2020

Demographic information about the bank’s assessment area is presented in the following table, followed by a summary of key economic characteristics of the assessment area.

¹ The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau’s American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level). The income data used to calculate geographic income designations changed between 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

2023 WI Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	7,435	18.7
Moderate	3	6.1	2,156	5.4	120	5.6	7,427	18.7
Middle	40	81.6	33,341	83.8	2,521	7.6	9,423	23.7
Upper	6	12.2	4,279	10.8	202	4.7	15,491	38.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	49	100.0	39,776	100.0	2,843	7.1	39,776	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,828	2,298	5.1	60.0	939	24.5	591	15.4
Middle	62,620	37,930	84.2	60.6	15,660	25.0	9,030	14.4
Upper	7,324	4,803	10.7	65.6	1,624	22.2	897	12.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	73,772	45,031	100.0	61.0	18,223	24.7	10,518	14.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	394	6.2	338	5.9	41	7.9	15	7.9
Middle	5,365	84.0	4,798	84.5	402	77.8	165	86.8
Upper	629	9.8	545	9.6	74	14.3	10	5.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,388	100.0	5,681	100.0	517	100.0	190	100.0
Percentage of Total Businesses:				88.9		8.1		3.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	89	8.0	89	8.1	0	0.0	0	0.0
Middle	965	86.9	948	86.7	16	94.1	1	100.0
Upper	57	5.1	56	5.1	1	5.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,111	100.0	1,093	100.0	17	100.0	1	100.0
Percentage of Total Farms:				98.4		1.5		0.1
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

The bank's assessment area is primarily rural in nature, despite the inclusion of Iowa County's two MSA census tracts. Additional unique aspects of the assessment area include its location between two MSAs, the Dubuque, IA MSA #20220 and Madison, WI MSA #31540, which results in some residents residing in the non-MSA portion of the assessment area yet commuting to work or working virtually in the MSAs. Northeastern Sauk County is also a part of the Wisconsin Dells tourist and recreational area which is a primary destination for leisure activities in the state.

Economic characteristics of the assessment area and the counties comprising the assessment area are detailed below. Of note in the comparisons, Iowa County is a part of the four county Madison, WI MSA #31540 and therefore the data for that county is influenced by its MSA status and its inclusion of only two of the six tracts in the county. The partial Iowa County aspect of the assessment area is different from the aggregate Iowa County figures because Community First Bank's inclusion of partial Iowa County is of the two moderate-income census tracts, with the excluded portion of the county comprised of middle-income census tracts.

Population Characteristics

The following table presents the population trends for the counties that make up the bank's assessment area, the entire Non-MSA Wisconsin, and the state of Wisconsin from 2015 to 2020. Sauk and Grant Counties have the largest populations of counties within the assessment area, at 65,763 and 51,938, respectively according to the 2020 U.S. Census. Those counties have seen population growth from 2015 to 2020, particularly for Sauk County experiencing growth at a rate of 4.4 percent, which a community representative indicated benefits from local economic initiatives have contributed to population growth. The remaining counties in the assessment area experienced declines in population, including Richland County's decline of 2.5 percent, which was one of the most significant in the state of Wisconsin according to discussions with community representatives. The state of Wisconsin experienced a 2.6 percent increase in population, which was greater when compared to the Non-MSA Wisconsin with 1.8 percent population growth.

Community representatives indicated that the population growth in Grant County was influenced by its proximity to the Dubuque, Iowa job market, and with Sauk County, the county's proximity to the Madison, Wisconsin job market. Population losses experienced in other assessment area counties are in line with declining population trends in rural counties due to aging populations, with younger generations leaving the area for employment in more urban communities. A community representative has seen indications of future population growth as a result of payroll, birth data and Head Start enrollments, and stated that census data have likely missed the area's growing immigrant populations, particularly in Richland County.

Population Change			
Area	2015 Population	2020 Population	Percent Change (%)
Crawford County, WI	16,483	16,113	-2.2
Grant County, WI	51,489	51,938	0.9
Iowa County, WI ¹	23,769	23,709	-0.3
Richland County, WI	17,746	17,304	-2.5
Sauk County, WI	62,992	65,763	4.4
Non-MSA Wisconsin	1,476,482	1,503,031	1.8
State of Wisconsin	5,742,117	5,893,718	2.6

Source: 2011-2015 U.S. Census Bureau American Community Survey and 2020 U.S. Census Bureau Decennial Census
¹ The assessment area includes a portion of Iowa County, two of a total of six tracts, which has a population of 6,064.

Income Characteristics

According to the U.S. Census Bureau, the assessment area is comprised of 39,776 families, with 18.7 percent of families designated as low-income, 18.7 percent are moderate-income, 23.7 percent are middle-income, and 38.9 percent are upper-income. The following table compares the median family income (MFI) for the counties that make up the assessment area, the entire Non-MSA Wisconsin, and the state of Wisconsin. Median family income levels vary substantially within assessment area counties, from a low of \$65,151 in Richland County to a high of \$76,662 in Sauk County. Iowa County is not included in this comparison as its \$85,589 median family income level is not representative of the two moderate-income census tracts included in the bank’s assessment area; these tracts have a median family income level of \$70,338, or \$15,251 less than the Iowa county average in the table below. All counties within the assessment area along with the state of Wisconsin experienced a growth in MFI since 2015.

Similarly, there are significant differences in poverty levels among assessment area counties. The assessment area as a whole has 7.1 percent of families with income levels below poverty. However, both Crawford and Richland Counties’ poverty levels are 9.0 percent and 9.2 percent, respectively. Community representatives indicated that school district data in Crawford and Richland Counties had higher rates of students living in poverty than other school districts in the assessment area.

Community representatives also indicated that the higher income levels in Sauk County and in the moderate-income census tracts in Iowa County, are driven by its proximity to the Madison, Wisconsin job market, while Grant County’s median family income level benefits from the larger size and diversity of employers in the community of Platteville.

Median Family Income Change			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change (%)
Crawford County, WI	62,384	66,796	7.1
Grant County, WI	67,022	71,104	6.1
Iowa County, WI ²	76,276	85,589	12.2
Richland County, WI	61,198	65,151	6.5
Sauk County, WI	70,658	76,662	8.5
Non-MSA Wisconsin	66,365	71,740	8.1
State of Wisconsin	74,365	80,844	8.7

*Source: 2011 - 2015 and 2016 -2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.
² The assessment area portion of Iowa County, two of a total of six tracts, has a lower 2020 median family income of \$70,338.*

Housing Characteristics

Housing was identified by community representatives as a significant need in the assessment area, regardless of income levels. The assessment area’s median housing value and median gross rent equaled \$162,372 and \$746, respectively, based on 2023 FFIEC Census Data. Crawford and Richland Counties have substantially lower housing values and rents than other assessment area counties at \$136,600 and \$673, and \$141,800 and \$688, respectively. In contrast, Sauk County, had a substantially higher median housing cost of \$185,000, illustrating again the differences in economic opportunities and wealth across the assessment area counties.

As shown in the following table, high levels of low-income renters and owners are housing cost burdened. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs. Sauk County’s low-income borrowers are particularly cost burdened, as 78.0 percent of renters and 69.9 percent of owners are cost burdened. Moderate-income renters have housing cost burdens that are slightly below those of all renters, regardless of county, while the opposite is true for moderate-income owners, where higher levels of moderate-income owners are cost burdened than all owners. The level of cost-burdened moderate-income owners ranged from a high of 31.3 percent in Sauk County to a low of 18.9 percent in Crawford County.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Crawford County, WI	56.5	5.6	29.3	55.0	18.9	18.1
Grant County, WI	67.3	21.9	37.2	52.6	25.0	15.6
Iowa County, WI	58.7	20.8	29.8	61.9	27.3	18.0
Richland County, WI	58.5	22.0	30.4	67.1	30.6	23.5
Sauk County, WI	78.0	28.7	36.1	69.9	31.3	19.0
Non-MSA Wisconsin	66.4	19.1	34.0	60.0	26.0	18.2
State of Wisconsin	74.5	21.7	39.0	63.9	28.2	17.6

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

Housing is also older in the assessment area than in other non-MSA areas of Wisconsin. The assessment area has a median age of housing stock equal to 52 years, and ranges from a low of 41 years in Sauk County to a high of 61 years in Iowa County’s two moderate-income census tracts. Community representatives indicated that housing needs include multi-family, single family residences, and senior housing options both for owner-occupied and rental housing. The lack of housing has also affected the ability of communities to attract frontline workers and teachers.

Employment Characteristics

The following table presents the unemployment trends for the counties that make up the assessment area, the entire Non-MSA Wisconsin, and the state of Wisconsin. Unemployment throughout the assessment area is at low levels, after spiking in 2020 during the COVID-19 pandemic. There are, however, differences in unemployment rates among assessment area counties, with Crawford County having the highest unemployment rate in all periods with the exception of 2020 with an unemployment rate of 3.8 percent in 2022, followed by Richland County at 2.8 percent; these are the most rural counties in the assessment area. The remaining assessment area counties have unemployment rates under 3.0 percent. Discussions with community representatives indicated that the low unemployment rates may also represent a trend of lower workforce participation rates that accelerated during the COVID-19 pandemic.

Bureau of Labor Statistics data indicates that employment in the counties that make up the assessment area is concentrated in the areas of manufacturing, retail trade, and the government sectors. Community representatives indicated that employment centers include Platteville with the University of Wisconsin campus and a diverse employer base, that agricultural-related manufacturing employment is largely food processing related and that some assessment area workers commute into the Dubuque, Iowa or Madison, Wisconsin job markets for higher wages. The representatives also indicated that it can be difficult for local employers to recruit critical job skills, as job market demand outpaces the availability of qualified labor in fields such as health

care, and agricultural production work involving technology.

Unemployment Rates (%)					
Area	2018	2019	2020	2021	2022
Crawford County, WI	3.7	4.0	7.4	4.5	3.8
Grant County, WI	2.8	3.1	5.3	3.1	2.7
Iowa County, WI	2.6	2.7	6.2	3.4	2.6
Richland County, WI	2.6	3.0	5.2	3.6	2.8
Sauk County, WI	2.5	2.8	7.6	4.1	2.8
Non-MSA Wisconsin	3.2	3.4	6.4	3.9	3.1
State of Wisconsin	3.0	3.2	6.4	3.8	2.9

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

Community Representatives

The performance evaluation included discussions with representatives of two community organizations with specialization in assisting low- and moderate-income individuals and supporting economic development. Both representatives indicated there was significant unmet demand for housing, regardless of income levels. It is difficult to attract contractors in rural areas to build either single-family, or multi-family, residences without additional economic incentives. The lack of housing, school district funding issues, and lack of large employers in smaller assessment area communities, have contributed to concerns for the viability of some communities in the assessment area. Local banks are supportive of low- and moderate-income individuals and small businesses and farms in their lending programs, yet in addition to housing development, there is also a significant need for financial literacy for both individuals, including immigrant populations, and for small businesses and farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Community First Bank’s lending test performance is Satisfactory based on a reasonable loan-to-deposit ratio, a majority of lending occurring within the bank’s assessment area, a reasonable distribution of residential, small business, and small farm lending in moderate-income census tracts and a reasonable penetration of lending among low- and moderate-income borrowers and businesses and farms of different sizes. No CRA-related complaints were received by the bank or the Reserve Bank during the evaluation period.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is considered reasonable, given the bank's size, financial condition, the credit needs of its assessment area, and considering, as appropriate, other lending-related activities

such as loan originations for sale to the secondary markets and community development loans and qualified investments. In the 12-quarter period from June 30, 2021, through March 31, 2024, Community First Bank’s loan-to-deposit ratio averaged 70.0 percent, compared to the 67.9 percent average of the bank’s local competitors. This level of lending in relation to the bank’s deposits indicates that the bank is actively meeting the credit needs of its assessment area. The following table compares the bank’s LTD ratio to its local competitors. Similarly situated competitors were selected based on their asset size, branching locations, and market share within the bank’s assessment area.

Comparative Loan-to-Deposit Ratios as of March 31, 2024	
Comparative Data	12 Quarter Average (%)
Community First Bank	70.0
Peer Avg – Local	67.9
Competitors	
Mound City Bank	86.7
Royal Bank	73.5
Peoples State Bank	61.8
Peoples Community Bank	60.6
Baraboo State Bank	56.9

Assessment Area Concentration

Community First Bank originated a majority of its loans, and as appropriate, other lending-related activities, in the bank’s assessment area. Based on a sample of the bank’s 2023 lending activities, 88.7 percent of the bank’s residential, small business, and small farm loans by number and 79.7 percent by dollar amount were originated inside the assessment area. Loan originations inside the assessment area ranged from a high of 92.4 percent by number for small farm loans, 90.6 percent by number for residential real estate loans, and 82.7 percent for small business loans. Overall, the percentage of residential real estate, small business, and small farm loans originated within the assessment area indicates the bank is actively serving the credit needs of the local community.

The following table summarizes the bank’s lending inside and outside its assessment area through a sample of residential real estate, small business, and small farm loans originated from January 1, 2023, through December 31, 2023.

Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Residential Loans	96	90.6	12,674	78.7	10	9.4	3,421	21.3
Small Business	62	82.7	6,041	72.5	13	17.3	2,290	27.5
Small Farm	61	92.4	5,545	92.4	5	7.6	458	7.6
Total Loans	219	88.7	24,261	79.7	28	11.3	6,169	20.3

Geographic Distribution

Community First Bank demonstrated a reasonable geographic distribution of loans in the bank's assessment area. An analysis of the geographic distribution of samples of residential real estate, small business, and small farm loans was conducted to determine the dispersion of loans among the census tract designations within the assessment area, particularly moderate-income census tracts, given the bank's assessment area does not include low-income census tracts. A review of the bank's lending patterns found that the bank originated loans in each of the bank's moderate-income census tracts during the evaluation period.

Geographic Distribution

Residential Lending

The geographic distribution of the bank's residential lending reflects a reasonable dispersion of lending throughout the assessment area. During the review period, 6.3 percent of residential real estate loans were originated within the bank's moderate-income census tracts. This lending level slightly exceeded the demographic measure of 5.1 percent of owner-occupied units in moderate-income tracts. The majority (90.6 percent) of the bank's residential real estate loans were originated in middle-income census tracts, which was greater than the percentage of owner-occupied units (84.2 percent) in the assessment area. Finally, the bank originated 3.1 percent of residential real estate loans in upper-income census tracts, which was below the owner-occupied units (10.7 percent) located in upper-income census tracts.

The following table summarizes the bank's 2023 residential real estate lending by income level of the geographies within the assessment area.

Distribution of 2023 Residential Lending By Income Level of Geography					
Assessment Area: WI Non MSA					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	6	6.3	1,710	13.5	5.1
Middle	87	90.6	10,565	83.4	84.2
Upper	3	3.1	399	3.1	10.7
Unknown	0	0.0	0	0.0	0.0
Total	96	100.0	12,674	100.0	100.0

Source: 2023 FFIEC Census and 2016-2020 U.S. Census Bureau: American Community Survey Data
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of the bank’s small business lending reflects a reasonable dispersion throughout the assessment area. Within the sample of small business loans reviewed, Community First Bank originated 4.8 percent of small business loans in moderate-income census tracts, which was slightly below the percentage of small businesses located in moderate-income census tracts at 6.2 percent. A majority (95.2 percent) of the bank’s small business loans were originated in middle-income census tracts, which was greater than the percentage of total businesses located in those geographies at 84.0 percent. The bank originated no loans within upper-income census tracts, which was below the percentage of total businesses located in those geographies at 9.8 percent.

The following table summarizes the bank’s 2023 small business lending by income level of the geographies within the assessment area.

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: WI Non MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	3	4.8	277	4.6	6.2
Middle	59	95.2	5,764	95.4	84.0
Upper	0	0.0	0	0.0	9.8
Unknown	0	0.0	0	0.0	0.0
Total	62	100.0	6,041	100.0	100.0

Source: 2023 FFIEC Census and 2016-2020 U.S. Census Bureau: American Community Survey Data and 2023 Dun & Bradstreet Data
Note: Percentages may not total 100.0 percent due to rounding.

Small Farm Lending

The geographic distribution of the bank’s small farm lending reflects a reasonable dispersion throughout the assessment area. Within the sample of small farm loans reviewed, Community First Bank originated 13.1 percent of small farm loans in moderate-income census tracts, which exceeded the percentage of small farms located in moderate-income census tracts at 8.0 percent. A majority (86.9 percent) of the bank’s small farm loans were originated in middle-income census tracts, which was equal to the percentage of total businesses located in those geographies. The bank originated no loans within upper-income census tracts, which was below the percentage of total farms located in those geographies at 5.1 percent.

The following table summarizes the bank’s 2023 small farm lending by income level of the geographies within the assessment area.

Distribution of 2023 Small Farm Lending By Income Level of Geography					
Assessment Area: WI Non MSA					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	8	13.1	779	14.0	8.0
Middle	53	86.9	4,767	86.0	86.9
Upper	0	0.0	0	0.0	5.1
Unknown	0	0.0	0	0.0	0.0
Total	61	100.0	5,545	100.0	100.0

Source: 2023 FFIEC Census and 2016-2020 U.S. Census Bureau: American Community Survey Data and 2023 Dun & Bradstreet Data
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and to Business and Farms of Different Sizes

Community First Bank’s loan distribution reflects reasonable penetration of lending among individuals of different income levels, (including low- and moderate-income individuals) and to businesses and farms of different sizes.

Residential Lending

Residential real estate lending reflects a reasonable penetration among borrowers of different income levels. In 2023, Community First Bank originated 14.6 percent of residential real estate loans to low-income borrowers, which was below the assessment area’s demographic of 18.7 percent within the assessment area. Among moderate-income borrowers, the bank originated 20.8 percent of residential real estate loans, which exceeded the 18.7 percent of moderate-income families within the assessment area. The bank originated 27.1 percent of its residential real estate loans to middle-income borrowers, which was greater than the percentage of middle-income families within the assessment area at 23.7 percent. Finally, the bank originated 37.5 percent of its residential real estate loans to upper-income borrowers, comparable to the percentage of upper-income families within the assessment area at 38.9 percent. Overall, these figures indicate the bank is appropriately serving the credit needs of low- and moderate-income borrowers within the assessment area.

The following table summarizes the bank’s 2023 residential real estate lending in the assessment area.

Distribution of 2023 Residential Lending By Borrower Income Level					
Assessment Area: WI Non MSA					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	%	
Low	14	14.6	1,731	13.7	18.7
Moderate	20	20.8	1,510	11.9	18.7
Middle	26	27.1	3,656	28.8	23.7
Upper	36	37.5	5,777	45.6	38.9
Unknown	0	0.0	0	0.0	0.0
Total	96	100.0	12,674	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

Community First Bank’s small business lending reflects a reasonable penetration among businesses of different sizes in 2023. A sample of small business loans originated in 2023 were reviewed, of which 66.1 percent by number were to businesses with gross revenues equal to or less than \$1 million. The bank’s performance was below the presence of total small businesses operating in the assessment area at 88.9 percent. However, 85.4 percent of the bank’s loans were originated to businesses with annual revenues of \$1 million or less in the amounts of \$100,000 or less. Further, 72.6 percent of all small business loans were equal to \$100,000 or less. These loans are considered the most beneficial to small businesses and demonstrates the bank’s willingness to meet the credit needs of small businesses.

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: WI Non MSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	41	66.1	3,091	51.2	88.9
Over \$1 Million	21	33.9	2,950	48.8	8.1
Revenue Unknown	0	0.0	0	0.0	3.0
Total	62	100.0	6,041	100.0	100.0
By Loan Size					
\$100,000 or Less	45	72.6	1,728	28.6	
\$100,001 - \$250,000	11	17.7	1,891	31.3	
\$250,001 - \$1 Million	6	9.7	2,422	40.1	
Total	62	100.0	6,041	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	35	85.4	1,256	40.6	
\$100,001 - \$250,000	3	7.3	520	16.8	
\$250,001 - \$1 Million	3	7.3	1,315	42.5	
Total	41	100.0	3,091	100.0	
Source: 2023 FFIEC Census Data, 2023 Dun & Bradstreet Data, and 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Small Farm Lending

Community First Bank’s small farm lending reflects a reasonable penetration among farms of different sizes in 2023. Within the sample of small farm loans reviewed, the bank’s 2023 small farm lending was concentrated in farms with gross annual revenues of \$1 million or less. These loans comprised 90.2 percent of the bank’s loans by revenue, in comparison to the demographic measure of 98.4 percent of assessment area farms. A majority of the bank’s loans of this type were also made in dollar amounts of \$100,000 or less, at 69.1 percent, which is considered to be most beneficial to small farms and demonstrates the bank’s willingness to meet the credit needs of small farms.

Distribution of 2023 Small Farm Lending By Revenue Size of Farms					
Assessment Area: WI Non MSA					
	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	55	90.2	4,404	79.4	98.4
Over \$1 Million	6	9.8	1,142	20.6	1.5
Revenue Unknown	0	0.0	0	0.0	0.1
Total	61	100.0	5,545	100.0	100.0
By Loan Size					
\$100,000 or Less	40	65.6	1,496	27.0	
\$100,001 - \$250,000	17	27.9	2,741	49.4	
\$250,001 - \$500,000	4	6.6	1,308	23.6	
Total	61	100.0	5,545	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	38	69.1	1,376	31.2	
\$100,001 - \$250,000	15	27.3	2,438	55.4	
\$250,001 - \$500,000	2	3.6	590	13.4	
Total	55	100.0	4,404	100.0	
Source: 2023 FFIEC Census Data, 2023 Dun & Bradstreet Data, and 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Response to Complaints

Neither the bank nor this Reserve Bank have received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

The bank’s performance relative to the community development test is Satisfactory. Community First Bank demonstrates an adequate responsiveness to the community development needs of its assessment area through qualified community development loans, investments, including donations, and services.

Lending, Investment, and Services Activities

In the period from August 3, 2021, through August 12, 2024, the bank originated a total of \$15.8 million of community development loans, investments and donations, and 590.3 hours of community development services. Major contributions were comprised of community development loans, at approximately \$11.1 million, predominantly in the areas of economic

development and revitalization/stabilization of moderate-income census tracts. These loans were primarily made to non-profit organizations, such as local government entities, although one loan for affordable housing purposes resulted in the construction of seven units of income-qualified housing in the assessment area. Community development investments were comprised of approximately \$1.5 million of new investments in bonds supporting government-sponsored infrastructure improvements and enhancements to local educational organizations, in addition to prior period investments of approximately \$3.2 million. Community development donations totaled \$33,593, predominantly in support of organizations providing community services to low- and moderate-income individuals.

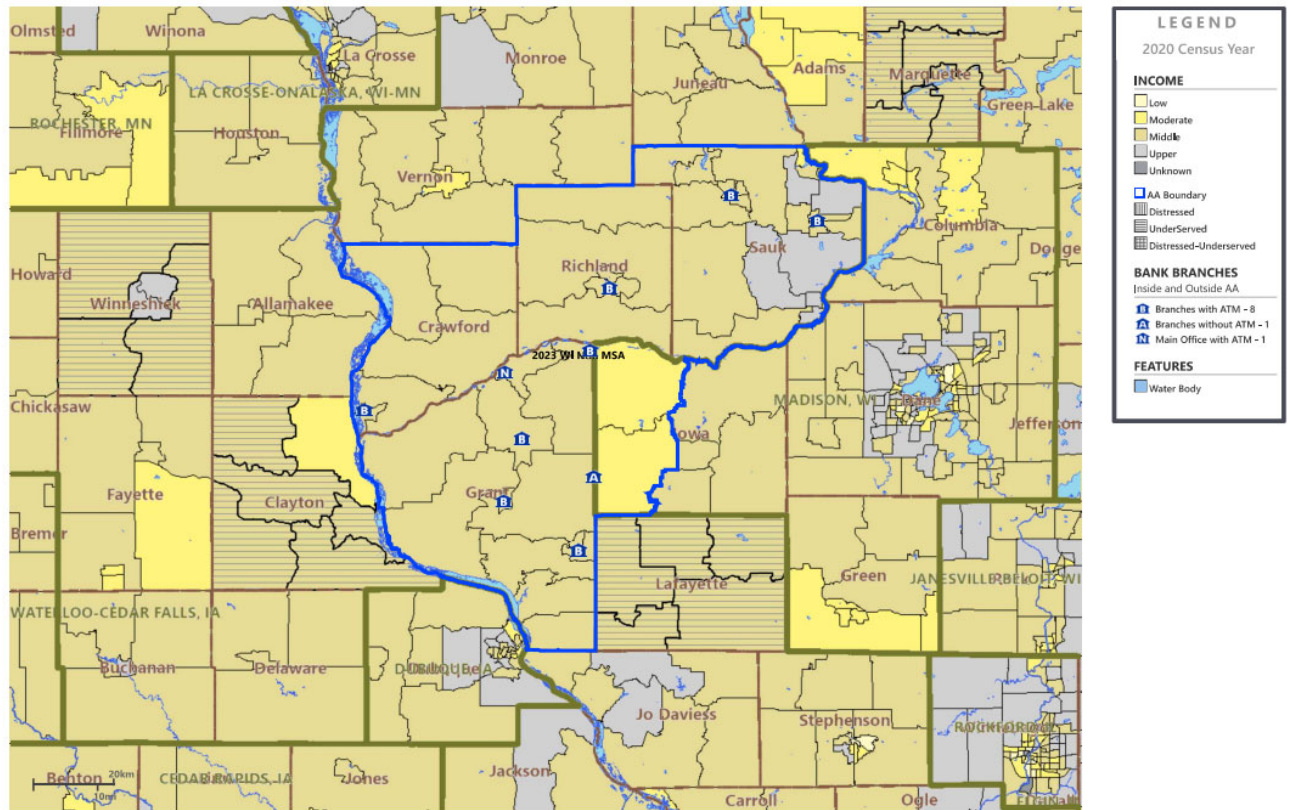
Community First Bank employees contributed a total of 590.3 hours of community development services during the evaluation period. Many of these hours were provided in leadership roles at local community organizations in support of community services and economic development.

Summary of Community Development Activities in the Assessment Area										
August 3, 2021, to August 12, 2024										
Type of Activity	AH		CS		ED		R/S		Total	
	\$	#	\$	#	\$	#	\$	#	\$	#
Loans	910,860	1	0	0	4,600,000	1	5,586,899	13	11,097,759	15
Investments										
Current	0	0	0	0	1,465,000	3	0	0	1,465,000	3
Prior	1,530,073	1	250,591	1	511,841	1	880,708	4	3,173,212	7
Donations	0	0	26,593	30	2,000	1	5,000	1	33,593	32
Total	2,440,933	2	277,184	31	6,578,841	6	6,472,607	18	15,769,564	57
	Hours	#	Hours	#	Hours	#	Hours	#	Hours	#
Services	29.5	2	172.0	11	388.8	10	0.0	0	590.3	23

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – Map of Assessment Area



APPENDIX B – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		Residential real estate, small business, and small farm loans originated from January 1, 2023, through December 31, 2023. Loan-to-deposit ratio from June 30, 2021, through March 31, 2024. Community development activities were evaluated from August 3, 2021, through August 12, 2024.	
FINANCIAL INSTITUTION Community First Bank Boscobel, Wisconsin		PRODUCTS REVIEWED Residential real estate loans Small business loans Small farm loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
None			
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
The single assessment area consists of contiguous non-MSA Crawford, Grant, Richland, and Sauk Counties in their entirety and two adjacent tracts in Iowa County, which is a part of the #31540 Madison, WI MSA.	Full scope review	None.	Until July 2024, the bank’s single assessment area included the entirety of non-MSA Lafayette County and all of MSA Iowa County.

APPENDIX C – Glossary

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.

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

American Community Survey Data (ACS): The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.²

Area Median Income (AMI): AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment area: Assessment area means a geographic area delineated in accordance with section 228.41

Automated teller machine (ATM): An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

Bank: Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an

² Source: FFIEC press release dated October 19, 2011.

uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

Branch: Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

Census tract: Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They 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.

Combined Statistical Area (CSAs): Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non metropolitan median income figure.

Community Development: The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. 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
4. 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 definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) 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 or 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 services including the needs of low- and moderate-income individuals.

Community Development Loan: A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
 - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
 - b. Benefits the bank’s assessment area(s) or a broader statewide or regional area that includes the bank’s assessment area(s).

Community Development Service: A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

Consumer loan: 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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).

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to

permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

Full review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

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

Home Mortgage Disclosure Act: The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

Home mortgage loans: Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

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.

Income Level: Income level means:

- 1) Low-income – an 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 census tract;
- 2) Moderate-income – an 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 census tract;

- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an 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 census tract.

Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).

Limited-purpose bank: This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

Limited review: Performance under the Lending, Investment, and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

Loan location: Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

Loan production office: This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

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 (HUD) 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: A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

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

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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: This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

Small Bank: This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.252 billion. Intermediate small bank means a small bank with assets of at least \$313 million as of December 31 of both of the prior two calendar years and less than \$1.252 billion as of December 31 of either of the prior two calendar years.

Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.

Small Business Loan: This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: This term refers to a loan that is included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).